



EUSTON TOWER

ES Addendum Volume 3 – ES Addendum Technical Appendices

December 2024

Table of Contents

Volume 1: ES Addendum Main Report

Chapter 1: Introduction, Proposed Design Amendments and ES Addendum Approach
Chapter 6: Socio-Economics
Chapter 7: Traffic and Transport
Chapter 8: Air Quality
Chapter 9: Noise and Vibration
Chapter 10: Daylight, Sunlight, Overshadowing and Solar Glare
Chapter 11: Wind Microclimate
Chapter 12: Climate Change and Greenhouse Gases
Chapter 13: Summary and Conclusions

Volume 2: Townscape Visual and Built Heritage Assessment

Volume 3: ES Addendum Technical Appendices

Appendix: Introduction, Proposed Design Amendments and ES Addendum Approach
Appendix: Daylight, Sunlight, Overshadowing and Solar Glare
Appendix: Wind Microclimate
Appendix: Climate Change and Greenhouse Gases

Appendix: Introduction, Proposed Design Amendments and ES Addendum Approach

Annex 1: LBC ES Review and Review Responses

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Annex 1: LBC ES Review and Review Responses

November 2024
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Dear All,

RE: Euston Tower Environmental Statement Review – Ref: 2023/5240/P

This letter constitutes the response of British Land Property Management Limited (the Applicant) to the Environmental Statement (ES) Review Report (dated 12 April 2024) prepared by CBRE on behalf of the London Borough of Camden (LBC).

An initial response to the ES review was provided to the LBC on the 25 July 2024. Following this a meeting was held with CBRE (as the LBC’s ES Reviewer) on 23 October, to discuss the updated ES Review (September 2024) and to provide an update on post submission design changes which are being undertaken following discussions with the LBC.

The response to the final comments raised as part of the review are provided in Table 1.

This is the final response to the ES Review. All comments have been responded to, and where additional information will be provided within the updated environmental reporting for the proposed design changes, this has been made clear within the response.

Kind regards,

Henry Brittlebank
Associate
For and on behalf of Trium Environmental Consulting LLP

Table 1 Summary of Responses to ES Clarifications and Potential Regulation 25 Items

Points Raised in the ES Review	Response	CBRE Review of Additional Information Submitted	Trium Final Response
Chapter 2: EIA Methodology			
ES Clarifications Required	Response	CBRE Review of Additional Information Submitted	Trium Final Response
Paragraph 2.51 explains different classifications for the duration of effects, including; short-term, medium-term, long-term, temporary and permanent. However, no definitions or specific durations are provided (e.g. short-term equates to 6 months). This kind of distinction is recommended. Clarification should be provided to confirm if these terms have been provided consistently throughout the ES.	For the purposes of the ES, in general terms effects that are generated as a result of the deconstruction and construction works (i.e. those that last for this set period of time) are classed as 'temporary'; these in general are further classified as either 'short term' or 'medium-term' effects depending on the duration of the deconstruction and construction works that generate the effect in question, as set out in ES Volume 1, Chapter 2: EIA Methodology . The definition of, 'short term' or 'medium term' effects vary between technical disciplines and as such further details are provided within each technical ES chapter (ES Volume 1, Chapters 6 to 12) where relevant. All effects associated with the Completed Development are considered to be permanent and long-term.	While some topics clearly set out the definition of short term, medium term and long term, e.g. Noise and Vibration and Traffic and Transport, this is not the case for all topics. It is recommended that a generic definition is provided for those topics which do not confirm the duration / definition, or that each topic does not currently provide a definition confirms what has been used.	In the ES Addendum for the post submission design changes, each topic will provide a definition of short term, medium term and long term as relevant. ES Chapter 2: EIA Methodology will remain with a high level definition, as this sets out the general approach to assessment.
Chapter 3: Alternatives and Design Evolution			
ES Clarifications Required	Response	-	-
As noted in Section 4.2, the description of the consultation undertaken makes no reference to any non-statutory consultees over and above the general public. Clarification is therefore sought as to whether any non-statutory consultees have been consulted through this process.	Throughout the consultation process, the Applicant organised meetings with a variety of stakeholders, local people and community groups. Stage 1 of the engagement process targeted engagement sessions with local groups and organisations to shape the merging proposals for the Proposed Development. This included, but is not limited to: <ul style="list-style-type: none"> • Kings Cross Brunswick Neighbourhood Association; • Camden Giving; • Mosaic LGBT+ Young Persons Trust; • KCBNA Youth Team; and • Third Age Project. Full details of the groups and organisations consulted during the engagement process are included in the Statement of Community Involvement submitted with the planning application.	Clarification response noted. No further information needed.	Clarification closed out.
Chapter 4: The Proposed Development			
ES Clarifications Required	Response	-	-
Paragraph 4.102 sets out how the water demand for the proposed development has been calculated using a	Given the flexible land uses proposed across the Proposed Development (Use Class E(g) – office / lab enabled workspace), the commercial benchmark utilised to estimate the water demand of the Proposed Development	Clarification response noted. No further information needed.	Clarification closed out.

Points Raised in the ES Review	Response	CBRE Review of Additional Information Submitted	Trium Final Response
commercial benchmark. Clarification from the Applicant is requested that this would be a worst case scenario when considering the possible demand that proposed development could result in, specifically, is the commercial benchmark also suitable for life science uses?	<p>is considered representative. Furthermore, the total water demand has been calculated based on the maximum jobs which could be generated by the Proposed Development (5,512 jobs), therefore 496,080 litres per day represents a worst-case scenario.</p> <p>The Proposed Development will also incorporate a range of measures to minimise the consumption of potable water, including the following:</p> <ul style="list-style-type: none"> • Water efficient fixtures and fittings, such as dual flush WCs and low wash hand basins and kitchen taps within the proposed WCs and shower rooms; • Greywater and rainwater harvesting systems; and • A leak detection system. 		
Chapter 5: Deconstruction and Construction			
ES Clarifications Required	Response	-	-
From Figures 5.2 – 5.4, it appears that the bus stop, and a portion of the bus lane, on Hampstead Road would require partial closure temporarily. No information is provided regarding this aspect of works. Details of this and any other known road closures required should be confirmed by the Applicant.	The bus stop located on Hampstead Road will be relocated approximately 15-20m to the north of its current located during the deconstruction and construction of the Proposed Development and will be returned to its existing location once construction is complete. Information and consideration of this temporary relocation is provided with ES Volume 1, Chapter 7: Traffic and Transport in paragraphs 7.200 to 7.201, as well as within the phasing plans of the CMP. No further road closures or diversions are envisaged during the deconstruction and construction phase of the Proposed Development.	Clarification response noted. No further information needed.	Clarification closed out.
Chapter 7: Traffic and Transport			
ES Clarifications Required	Response	-	-
While it is identified to be a temporary long-term effect (i.e. more than 5 years), it is not clear from the Transport Chapter, or Chapter 5, whether the relocation of the bus stop would be a permanent alteration. It is therefore requested that the Applicant should clarify this.	The relocation of the bus stop along Hampstead Road will not be permanent. As The bus stop will be relocated approximately 15-20m north of its current location during the deconstruction and construction of the Proposed Development and will be returned to its existing location once construction is complete.	Clarification response noted. No further information needed.	Clarification closed out.
The Transport Strategy Service request that the Applicant provide the full TRICS output	The full TRICS output is included in Appendix A of this response.	TRICS output noted. It is assumed that this has also been sent by the Applicant to the Transport Strategy Service.	Clarification closed out.

Points Raised in the ES Review	Response	CBRE Review of Additional Information Submitted	Trium Final Response
While it is considered that any trips associated with the disabled car parking would be negligible, the Applicant should provide clarification as to whether this trip generation exercise includes any daily trips associated with the disabled car parking spaces proposed.	No trip assessment was undertaken for the two blue badge parking spaces provided as part of the Proposed Development as any trips associated with these bays were considered to be negligible as set out in the <i>'Impact Assessment Methodology'</i> section of ES Volume 1, Chapter 7: Traffic and Transport .	Clarification response noted. No further information needed.	Clarification closed out.
Chapter 8: Air Quality			
ES Clarifications Required	Response	-	-
While the applicant has made it clear that full details of the life safety generator are not known, it is queried whether a conservative assessment could be undertaken based on the available information. The applicant makes no reference of the likelihood of either energy plant option resulting in significant environmental effects and recommends (paragraph 8.57) that the selected option is assessed to discharge a planning condition attached to any future consent. While this is not uncommon, the applicant should either provide limits that would be achieved to ensure no significant effects would occur or undertake an assessment of the plant likely to be included to identify that with its intended limited use, no significant effects would be anticipated	<p>The Applicant is not seeking to provide on-site life safety generators within the Proposed Development, however, for completeness a space planning exercise was undertaken such that in the unlikely event that a life safety generator is required, this can be accommodated within the design of the Proposed Development.</p> <p>As such, an assessment of life safety generator emissions was not undertaken as there is insufficient information available with which to undertake a meaningful assessment. Any assessment would require a number of worst-case assumption for parameters such as NOx emissions and flue temperatures, which are unlikely to reflect the final design of the life safety generator which may be installed.</p> <p>Therefore, it is suggested that an assessment is undertaken if it is determined that a life safety generator is required, and the plans for the life-safety generator have been finalised, to confirm air quality effects associated with the use of the life safety generator are likely. It is proposed that this is secured via an appropriately worded planning condition.</p> <p>If the assessment identifies a risk of significant effects, the design of the life safety generator will be revised, to ensure there are no significant impacts on local air quality.</p>	Clarification response notes. On the basis that generators are not anticipated as part of the Proposed Development. CBRE agree that further assessment can be undertaken to discharge a condition attached to any future planning permission should they be proposed. No further information needed.	Clarification closed out.
Chapter 11: Wind Microclimate			
ES Clarifications Required	Response	CBRE Review of Additional Information Submitted	Trium Final Response
It is the opinion of CBRE that off-site balconies should have been included in the assessment as they are identified as a critical pedestrian-level location /	The wind microclimate assessment within ES Volume 1, Chapter 11: Wind Microclimate utilises the Lawson Comfort Criteria (the London Docklands Development Corporation (LDDC) version) as the basis of assessment, and not the City of London Wind Microclimate Guidelines as set out in the EIA Scoping Report and which was agreed	While it is noted that the LDDC criteria has been used, paragraph 7 of the Wind Microclimate Topic Sheet references balconies as onsite receptors. The topic sheet goes on to state that the assessment will consider the "usability for a range of pedestrian and amenity activities as set out above at paragraph 7". CBRE's Euston Tower	Qualitative narrative will be provided in the ES Addendum Chapter on off-site balconies.

Points Raised in the ES Review	Response	CBRE Review of Additional Information Submitted	Trium Final Response
monitoring location in City of London Wind Microclimate Guidelines (2). Further testing of the effects at these receptors should be provided.	<p>as part of LBC's EIA Scoping Opinion. The Lawson LDDC Criteria does not provide target thresholds for occasional use 'good weather' spaces, such as off-site balconies.</p> <p>However, a target wind condition of 'Standing' or better in the summer condition, as described by the Lawson LDDC criteria, was selected to represent a comfortable threshold for off-site balconies. Using professional judgement, given all the balconies within the zone of influence of the Proposed Development, include one or more significant sheltering features (e.g. solid balustrades, porous screening elements etc.), these areas are considered to experience acceptably calm wind conditions and are not expected to be adversely affected by any changes created by the Proposed Development.</p>	<p>EIA Scoping Report Review notes this and also stated "the applicant should also give consideration to any off-site balcony locations."</p> <p>Therefore, consideration should have been given to on and off-site balconies.</p> <p>Outcome remains as 'Concerns'</p>	<p>As discussed with CBRE in the meeting on the 23 October, off site balcony assessments cannot be undertaken and are not a policy or guidance requirement in the LBC.</p> <p>However, professional judgment based on a wealth of experience and the large amount of wind tunnel testing in the area will be utilised to provide a summary of anticipated conditions at off-site balconies and their acceptability.</p>
It is acknowledged in paragraph 11.160 that no separate cumulative configuration has been tested on the basis that only one cumulative scheme is located within the defined study area and, as this is partially built, this has been included in Configurations 2 and 3. CBRE consider this approach to be broadly acceptable, however clarification is sought as to whether this scheme was also included in Configuration 1 as well.	The cumulative schemes (Network Building (95-100 Tottenham Court Road), 76- 80 Whitfield Street and 88 Whitfield Street, London, W1T 4TP) was not included within Configuration 1. However, from a qualitative review of the size and location of the cumulative scheme (located more than 300m south-east of the site), it is considered that the presence of the building would not have a material impact on the baseline condition presented within Configuration 1. As acknowledged, these buildings were included in Configurations 2 and 3.	The inclusion of this scheme in all configurations would have been preferred in order to ensure that the changes are as a result of the Proposed Development only. However, appreciating the distance and size of the cumulative scheme from the site, and no further information is needed.	Clarification closed out.
It is however noted that off-site mitigation in the form of existing Transport for London (TfL) trees is being relied on. CBRE appreciate that testing has been done without the TfL landscaping (configuration 2) and that the Applicant has acknowledge that these trees have an impact on the local wind conditions. However, CBRE have concerns that there is no way to secure this mitigation. Therefore, the Applicant is requested to confirm how the effects would be managed should this be removed.	The proposed landscaping is currently being reviewed by the Applicant and Design Team. Further testing will be undertaken and additional information will be submitted to LBC, which will detail the landscaping tested, and how it will be secured.	<p>No comment can be provided until the further information is provided.</p> <p>Outcome remains as 'Concerns'</p>	The existing trees are not specific mitigation introduced by the Applicant, they form part of the existing baseline. It is common practise in wind assessments to utilise existing baseline conditions and is in line with the EIA Regulations.

Points Raised in the ES Review	Response	CBRE Review of Additional Information Submitted	Trium Final Response
Paragraph 11.158 identifies that the final mitigation has not been tested and is determined based on professional judgement, while it is acknowledged that this provides a useful commentary on the likely outcome of the implementation of this mitigation, CBRE would expect this to be confirmed by additional testing. It would be anticipated that this would be completed to discharge a suitably worded planning condition. It is not clear as to why the additional mitigation was not tested along with all the other measures. Clarification is sought as to why this was not done. Clarification is also sought as to how this mitigation measure would be secured to ensure its implementation.	Additional testing of the final proposed mitigation will be undertaken and the conclusions this testing will included as part of further information to be submitted to LBC by the Applicant.	No comment can be provided until the further information is provided. Outcome remains as 'Concerns'	As discussed with CBRE on 23 October, all final proposed mitigation will be tested within the wind tunnel and form part of the proposals and ES Chapter.
Chapter 12: Climate Change and Greenhouse Gases – Part A			
ES Clarifications Required	Response	CBRE Review of Additional Information Submitted	Trium Final Response
With regards to the ICCI assessment, no overarching methodology has been provided. Therefore, CBRE request that further clarity on the overarching ICCI assessment methodology is provided (with reference to the sensitivity and vulnerability of receptors).	<p>The ICCI assessment utilises a qualitative approach as outlined within paragraph 12.5 of the ES chapter and paragraph 15 of the Climate Change Technical Note, included within ES Volume 3, Appendix: Climate Change and Greenhouse Gases – Annex 5. In line with the IEMA guidance and based on the approach, methodology and significance criteria relevant to the technical assessment, each technical specialist has considered the future climate scenario in respect of potential alterations to the following:</p> <ul style="list-style-type: none"> • The sensitivity of identified receptors; • The magnitude of impacts; • The resultant effects; and • Any additional mitigation that might be required to address the future climate scenario. 	In accordance with IEMA's Climate Change Resilience Report, CBRE would expect to see consideration of susceptibility and vulnerability in relation to identified sensitive receptors. While this is not explicitly stated, it is assumed that this has been considered in relation to the future climate scenario. Therefore, no further information needed.	Clarification closed out.

Points Raised in the ES Review	Response	CBRE Review of Additional Information Submitted	Trium Final Response
It is noted that the design would "minimise the exposure of future workers and visitors to health-related issues which could be accentuated by climate change". It is not clear from this section which health-related issues or design measures are being referred to. CBRE have assumed that this relates to the risks set out in paragraph 12.49. However, this should be confirmed.	<p>The health related issues which could be accentuated by climate include risks to human health, wellbeing and productivity from increased exposure to heat in homes and other buildings. The design measures incorporated into the Proposed Development which will minimise these risks include, but not limited to:</p> <ul style="list-style-type: none"> • Methods to minimise internal heat generation, such as energy efficient lighting, insulation of heating and hot water pipework and energy efficient equipment with low heat output; • A high performance curtain wall façade to minimise the risk of summertime overheating; and • Passive ventilation measures and openable, solid panels to provide internal cooling. 	Clarification response noted. No further information needed.	Clarification closed out.
The assessment notes that people travelling via active modes would be sensitive to climate change. Table 12.1, sets out the sensitivity and vulnerability for the ICCI assessment in relation to transport receptors. However, the sensitivity noted in this table for certain receptors is lower than the sensitivity assigned to them in Chapter 7, i.e. pedestrians and cyclists are both high sensitivity in Chapter 7 but appear to be assigned as medium in Chapter 12. Further to this, after Table 12.1, there appears to be no consideration of how these changes in sensitivity would follow through the assessment, with respect to magnitude and scale and significance of effect.	The methodology for determining sensitivity in relation to the In-Combination Climate Change Impacts (ICCI) Assessment differs to that to the Traffic and Transport Assessment included within ES Volume 1, Chapter 7: Traffic and Transport . Pedestrians and cyclists are considered more sensitive to impacts considered within ES Volume 1, Chapter 7: Traffic and Transport , and have therefore been assigned 'high' sensitivity, compared to their sensitivity to climate change.	Clarification response regarding the different methodology noted. However, it is unclear how the different sensitivity relates to the wider assessment of effects, as the chapter confirms that the effects of the proposed development would not alter under the future climate (paragraph 12.16)	The sensitivity will be re-considered in the ES Addendum and justification provided for the sensitivity of receptors to climate change in ES Chapter 12: Climate Change and Greenhouse Gases.
Chapter 12: Climate Change and Greenhouse Gases – Part B			
ES Clarifications Required	Response	CBRE Review of Additional Information Submitted	Trium Final Response
Specifically, no commentary is provided on which of the land use options have been considered in the assessment; therefore it is not possible to comment on whether the	A description of development which forms the basis of assessment is provided in paragraph 12.68 of the ES chapter. However, the assumption of land use is not relevant to this assessment and does not impact the results and conclusions presented.	The original clarification related to the various land use classes included as part of the Proposed Development (e.g. offices and lab workspace) and whether the predicted energy use was based on a robust, likely scenario for how the building would be used.	Clarification will be provided in the ES Addendum on the land use options and assumptions made for the Greenhouse Gas Assessment.

Points Raised in the ES Review	Response	CBRE Review of Additional Information Submitted	Trium Final Response
assessment provides a robust position. Clarification is therefore sought to understand which land use option has been assessed, and why that is considered appropriate.			
CBRE would expect that End Of Life Stage (Modules C1-4) emissions associated with these pre-construction activities should be quantified in this assessment.	The Whole Life Carbon Report submitted with the planning application confirms that the demolition and temporary works for the existing building on site have been considered in the results presented. The C1-C4 modules of the existing site have been considered within the A1 – A5 modules for the Proposed Development. As such, emissions associated with these pre-construction activities are considered within this assessment.	Clarification response noted. No further information needed.	Clarification closed out.
Chapter 15: Environmental Management, Mitigation and Monitoring Schedule			
ES Clarifications Required	Response	-	-
The Applicant should provide clarification for the way in which each measures would be implemented.	<p>Table 15.1 lists the Management Plans / Documents which have been prepared in draft to accompany the planning application or are committed to being prepared and implemented. These Management Plans / Documents will be secured through obtaining planning permission for the Proposed Development and their drafting, agreement and implementation will be subject to appropriately worded planning conditions attached to the planning permission.</p> <p>The additional environmental mitigation, design commitments and monitoring outlined in Table 15.2 are measures that the LBC will need to secure for the project, either via appropriately worded planning conditions (related to the planning permission) or through the planning obligations to be secured by the Section 106 Agreement.</p>	<p>Clarification response noted. It is therefore assumed that the following will be secured through planning conditions attached to any future permission:</p> <ul style="list-style-type: none"> - A detailed Unexploded Ordnance Risk Assessment; - Written Scheme of Investigation (WSI) - Construction Management Plan, and associated documents listed in Table 15.1 of Chapter 15; - Ground Movement Monitoring during deconstruction of the existing building; - Vegetation clearance outside of nesting bird season, or site checks by suitably qualified ecologist; - Car Parking Design and Management Plan; - Operational Waste Management Plan; - Ecological Management Plan; and - Further wind mitigation testing. 	Clarification closed out.
ES Volume 2: Townscape, Visual and Built Heritage Assessment			
ES Clarifications Required	Response	CBRE Review of Additional Information Submitted	Trium Final Response
There does not appear to be a clear section setting out any assumptions or limitations that exist with the baseline information presented. The Applicant should confirm what,	<p>The relevant assumptions and limitation of the Townscape, Visual and Built Heritage Assessment (TVIHA) are as follows:</p> <ul style="list-style-type: none"> • The assessment of effects is informed by relevant policy and guidance and also by professional judgement. Judgements on the scale and nature of 	Clarification raised related to the baseline conditions of the site and surrounding area. The response largely focuses on the assessment.	To be provided in updated assessment in the ES Addendum.

Points Raised in the ES Review	Response	CBRE Review of Additional Information Submitted	Trium Final Response
if any, assumptions / limitations exist.	<p>effects, while they follow the clear process of sub-assessments set out in the 'Assessment Methodology' section, are always subjective to an extent, as acknowledged in the Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA) in respect of townscape and visual effects (paragraphs 2.23 – 2.25). The assessment narratives in this volume have been set out as clearly and transparently as possible with descriptions of the factors and judgements that have informed the assessment;</p> <ul style="list-style-type: none"> • The cumulative assessment is an assessment of the likely effects of the Proposed Development in the context of the cumulative schemes. It assumes that all cumulative schemes are of high quality because they have been approved or submitted following a period of design development in consultation with LBC officers (or the relevant LPA officers where cumulative schemes are located outside of the LBC); and • The identification of relevant heritage assets and their heritage interest is based on publicly available records maintained by Historic England and the LBC, and it has been assumed that the information contained in these records is accurate. 		
Potential Regulation 25 Items	Response	-	-
Chapter 6 sets out the assessment of effects. In this section, minimal consideration is given to the effects of the deconstruction and construction stage. Paragraph 6.6 states that "there would be no effects on the heritage significance or appreciation of heritage significance of the heritage assets as a result of the deconstruction and construction process". No justification is provided as to why this is considered to be the case. Paragraphs 6.7 and 6.8 set out the outcome of the townscape character and views assessments for the deconstruction and	<p>The rationale for the assessment of deconstruction and construction effects is set out in Section 6, and particularly in paragraph 6.4. This includes explanation of the evaluation of effect as follows:</p> <p><i>"The likely scale and nature of effects identified as part of this assessment represent a precautionary worst-case based on the maximum potential effect on each receptor across the deconstruction and construction process as a whole, including the assumption that under-construction buildings have the same magnitude of impact as that of the finished buildings. The appearance of under-construction buildings is taken to be without full external cladding, and therefore generally adverse in nature."</i></p> <p>In respect of heritage assets, while under construction, the Proposed Development would not enhance the ability to appreciate the significance of any heritage assets, it is also considered that this commonplace and temporary situation would not detract from the appreciation of any heritage assets. This is particularly the case as there is already an</p>	<p>It is recommended that additional justification and explanation of the assessment of deconstruction and construction effects, particularly in relation to the heritage, is included in the forthcoming environmental assessment accompanying the updates to the Proposed Development.</p> <p>Additionally, the text should consider deconstruction and construction noise, and the additional presence of construction vehicles, and where this could affect the setting of any of the heritage assets.</p>	To be provided in updated assessment in the ES Addendum.

Points Raised in the ES Review	Response	CBRE Review of Additional Information Submitted	Trium Final Response
construction stage respectively, however as noted above, no reasoning is given to the evaluation of the effect and why that scale of effect / significance has been determined. Given the length of the construction period, this is considered to be inadequate and therefore, it is requested that the Applicant provide further evidence of this assessment.	<p>existing building on site of an equivalent size to that of the under-construction Proposed Development at full massing. It is therefore assessed that there would be no effect on the significance or appreciation of the significance of the identified heritage assets.</p> <p>In respect of townscape and visual effects, the scale and nature of effect is set out for each Townscape Character Area in paragraph 6.7 and for each view in paragraph 6.8. This is considered a proportionate assessment for deconstruction and construction effects.</p>		
Additional verified views have also been requested in the consultation response from the Royal Parks. These views have been requested to "assess if the Tower will be visible from Greenwich Park, including the view from One Tree Hill". They also note that it would be useful for nighttime views to be provided from all three Parks, namely Regent's Park, Kensington Gardens and Greenwich Park.	<p>The additional viewpoints requested by the Royal Parks will be considered as part of the additional information to be submitted to the LBC by the Applicant.</p> <p>Regarding nighttime views, having reviewed the opening times for Regent's Park, Kensington Gardens and Greenwich Park, it was concluded that these would not be necessary for the assessment, given that all these parks close at dusk.</p>	No comment can be provided until views and associated assessment is provided. Outcome remains as 'Concerns/Fail'	To be provided in updated assessment in the ES Addendum
The Applicant should provide the cumulative assessment relating to townscape, otherwise provide justification as to why this is not needed.	The cumulative assessment for the townscape assessment is provided at the end of Section 6 of the TVIHA, within paragraph 6.101. As noted by CBRE, it is only the Network Building that is considered relevant to townscape cumulative assessment, and it is assessed that it does not result in any change to the effect of the Proposed Development in the cumulative scenario in respect of the Townscape Character Areas.	Clarification response noted. No further information needed.	Clarification closed out.