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12th October 2017

Dear Gavin

**PROPOSED AMMENDMENTS TO THE CAMDEN GOODS YARD PLANNING APPLICATION
(2017/3847/P), LONDON BOROUGH OF CAMDEN: ENVIRONMENTAL IMPLICATIONS LETTER**

We are writing to you on behalf of our Client, Safeway Stores Limited and Barratt London (trading as BDW Trading Limited) ('the Applicant'), in regard to the full planning application (2017/3847/P) that was submitted to the London Borough of Camden (LBC) in June 2017 for the proposed redevelopment of a site off Chalk Farm Road ('the proposed development').

The full planning application was accompanied by an environmental statement ('2017 ES'), which reported on the outcomes of an environmental impact assessment (EIA) that was undertaken of the proposed development.

The 2017 ES was prepared by Ramboll Environ and a team of environmental specialists in accordance with the 2011 Environmental Impact Assessment Regulations (as amended in 2015), hereafter referred to as the 'EIA Regulations'.

The 2017 ES comprised the following suite of documents:

- Volume 1: Non-Technical Summary;
- Volume 2: Main ES Report;
- Volume 2A: Townscape and Visual Assessment;
- Volume 2B: Built Heritage Assessment;
- Volume 3A: Technical Appendices; and
- Volume 3B: Transport Assessment.

Following the submission of the 2017 ES, minor amendments have been made to the design of the proposed development in response to post submission consultation comments made by the LBC and other stakeholders, (hereafter referred to as the 'amended proposed development').

This letter provides clarification with regard to the environmental implications of the amended proposed development in respect of the 2017 ES, so that the LBC has appropriate and up-to-date environmental information on the amended proposed development's environmental effects, to enable the determination of the planning application.

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As part of the consultation materials a number of updated reports and updated plans have been submitted which should be read in conjunction with this letter. These are as follows:

- Amended planning and landscaping drawings and landscaping statement, together with Design Development Notes, which sets out the changes proposed. The amended landscape statement includes further details regarding tree planting and green roof specification;
- Transport Assessment Addendum, incorporating comments in relation to the Construction Management Plan and Servicing Management Plan;
- Revised draft Framework Travel Plan;
- Response to Access Officer comments;
- Additional information in relation to sunlight and daylight;
- Revised solar glare assessment to account for proposed mitigation measures proposed to be incorporated into the design of the Chalk Farm Road building;
- Noise Assessment Addendum;
- Air Quality Neutral Assessment Addendum;
- Revised Flood Risk Assessment and response to London LBC comments regarding surface water drainage;
- Revised Construction Management Plan Pro-forma;
- Response to LBC drainage comments;
- Addendum to Sustainable Design and Construction Statement, incorporating Energy Statement Addendum, Thermal Comfort Assessment Addendum and Building Air Quality Neutral Assessment Addendum; and
- Revised Basement Impact Assessment and note on groundwater conditions

1. Proposed Amendments

The amended proposed development relates to both parcels of land within the application site, the Main Site (MS) parcel and Petrol Filling Station (PFS) parcel. However there have been no amendments to the area schedule or unit/tenure mix.

In summary, the amended proposed development comprises of the following amendments although there are other minor revisions but these would not affect the 2017 ES:

1.1 PFS Parcel Amendments

- The ground floor frontages have been amended to reduce the set back of glazing from brick piers (to 800 mm from 1500m) and the brick colour has been confirmed as charcoal brick;
- Amendments to the vertical mullions¹ on the northern and southern facades to minimise solar glare reflections;
- Ground floor north eastern corner has been angled so that the bin store is now triangular in shape rather than square. This is to allow better ventilation through the PFS parcel forecourt; and
- Provision of on-site servicing space, replacing approximately five car parking spaces within the PFS car park.

¹ A mullion is a vertical element that forms a division between units of a window, door, or screen, or is used decoratively.

1.2 MS Parcel Amendments

- Block A: Minor façade amendments (large window introduced on the commercial entrance corner to activate the end wall; brick sill introduced to the windows; recess introduced) and low-level planters stepped in between bays to follow site gradient;
- Block B: Minor building and amenity space amendments (size of the active frontage increased; greater privacy given to ground floor residential units by the introduction of a brick wall/planter facing the urban farm entrance; height of urban farm entrance opening increased and signage added at ground floor level to make it more evident, with no change to the building height);
- Block C: Minor façade and roof profile amendments (canopy removed from the residential access to Southampton Square; workshop recessed entrance removed on Interchange Yard to prevent any possible safety issues; cut out on the roof on the top floor balconies facing Camden Yard);
- Block D: Minor façade and communal amenity space amendments (parapet changed to recessed balustrade; eastern wall of the rooftop pergola reduced in extent by 3 m; canopy introduced to the ground floor community space and detailed to provide a more evident differentiation between steel structure and timber panelling; grey metal panel on 1st floor corner balcony introduced to add privacy; slot windows and balcony windows separated and windows and balconies type changed), as well as plant room above roof moved toward Southampton Square to reduce potential noise issues; minor amendments on the facade treatment of the retail unit on the west elevation
- Block E1: Minor façade amendments (hit and miss brickwork introduced and perforated brickwork introduced to residential entrance; improved design of privacy screens on some corner bays; details added to metal perforated screen pattern on upper level bays; slight adjustment to glazing height on ground floor);
- Block E2: Minor façade amendments (north elevation amended to engage better with street; window added to ground floor; terraces on 2 floor level of townhouses removed to reduce overlooking); and
- Block F: Minor facade amendments (balconies facing Makers Yard amended to a thinner Juliet balcony that would have canopy purpose; metal balustrades amended between different blocks; glazing in two top floor penthouses reduced to address overheating concerns).

1.3 Landscaping Amendments

- Increased soft landscaping to include additional lawn areas, amendments to layouts of each yard (to define the community garden, expand planting and lawn areas, facilitate future connection into Camden Lock Market, provide public facing planting zone);
- Amended paving and planting layout to the end of Roundhouse Way and into Winding Vault Way to prioritise and emphasise pedestrian access through this space;
- Revised layout of pocket park at the PFS parcel to allow for a future youth recreation facility including better play provision for 5-11 and 12+ year olds;
- Reduced public roof terrace area in Block B to respond to potential noise issues from this location on the neighbouring Block C private amenity space;
- Minor revisions to pedestrian pavements to facilitate vehicle turning movements within the proposed development;
- Minor revisions to the location and distribution of cycle stands around the proposed development;

- Amended layout and definition of surface treatment and hedging to Southampton Square to provide more distinct areas for seating, play and added lawn area;
- Amended hedge privacy screening to duplex ground floor units of Block B and improved access into entrance to the urban farm; and
- Minor amendments to hard and soft landscape and permeable surfaces across the proposed development in conjunction with the above and additional detail to the rain garden sustainable drainage systems (SuDS) feature in the Goods Yard has been provided within the Sustainable Design and Construction Statement Addendum.

1.4 Transport and Access Amendments

- Retention of on-street parking at the northern edge of Chalk Farm Road with the exception of one bay moved further west to allow more queuing space on the approach to the stop line;
- Junction amendments including provision of two 3 m wide traffic lanes on Chalk Farm Road eastbound approach which have reduced from 3.75 m, plus a 1.5 m wide cycle feeder lane introduced and an increase in the Advanced Cycle Stop Lines to 5 m deep;
- Provision of cycle lane across the mouth of the PFS parcel access, and give-way line pushed back to accommodate this;
- Removal of pedestrian island for the informal crossing on Chalk Farm Road;
- Provision of equal width lanes exiting Juniper Crescent (both 3 m wide); and
- Revision of parking layout for the temporary store, including a loading bay on-site adjacent to storeroom access.

1.5 Drainage, Ventilation, Energy and Waste Amendments

- Change in the capacity of the proposed underground attenuation tanks to achieve a 3x Greenfield run off rate which is an improvement from the previously proposed 50 % reduction, assessed within the 2017 ES. The size of Tank 1 has remained at 306 m³ capacity; however, Tank 2 has increased by capacity from 347 m³ to 540 m³ (191 m³ increase) and the tank on the PFS parcel has increased by capacity from 92 m³ to 123 m³ (31 m³ increase).
- Introduction of Air Source Heat Pumps (ASHP) to replace the Combined Heat and Power (CHP) to reduce the combustion emissions and to align the scheme with the adopted Camden Goods Yard Planning Framework, which promotes the concept of a local Ultra Low Emissions Zone (ULEZ). In terms of carbon dioxide emissions, the ASHPs would allow the scheme to benefit from the future de-carbonisation of the electricity grid. The ASHPs would be provided within plant enclosure on the roof of Block A. This will not amend the building height of Block A.
- The results from the revised proposals contained in the Energy Statement Addendum show that the Amended Proposed Development would meet the applicable planning policies that relate to energy conservation, decentralised energy networks, renewable energy systems, and avoiding overheating. The Amended Proposed Development would also fully satisfy the equivalent local energy policies in the Camden Local Plan (June 2017).
- Given the limited nature of the amendments proposed, the drainage, ventilation, energy and waste strategies for the Amended Proposed Development remain the same as for the July 2017 ES.
- An addendum to the Sustainable Design and Construction Statement (SDCS) has been prepared which contains further details relating to the application of sustainable design and construction

principles, policies, and practices to the Amended Proposed Development. Furthermore, this document sets out a revised approach to low carbon heating technology.

1.6 Demolition and Construction Amendments

With respect to the demolition and construction stage, the development programme, methods of construction and overall phasing would not be amended for the amended proposed development when compared against the information outlined within the 2017 ES; however, the construction sequence has been amended so that Block F will come forward earlier in the programme than originally envisaged in order to deliver more of the affordable housing earlier in the process.

This would not affect any of the assumptions relied upon in the ES and therefore the conclusions of the technical assessments within the 2017 ES. Accordingly, this minor amendment has not been considered further.

1.7 Cumulative Schemes

There have been no new potential cumulative schemes submitted to the LBC since the 2017 ES was prepared. However there have been minor amendments to the Roundhouse scheme, which would not affect the cumulative assessments as presented within the 2017 ES. However, the LBC requested that viewpoints 4, 5 and 21 within the Townscape and Visual Assessment are updated to reflect the amendments to this cumulative scheme. Therefore, the cumulative effects assessment within the 2017 ES remains valid.

2. Policy Updates

The 2017 ES provided a summary of planning policy considerations for the proposed development in the context of national, regional and local policies, as well as other material considerations. Since the submission of the 2017 ES, the following local policy updates have taken place:

Regional Policy

Affordable Housing and Viability Supplementary Planning Guidance August 2017²

The new SPG supersedes section 3.3 (Build to Rent) and Part 5 (Viability) of the March 2016 Housing SPG; and the rest of the Housing SPG remains current. Neither of these revisions affect the assessments contained within the 2017 ES.

Draft London Environment Strategy, 2017³

On 11 August 2017, the Mayor of London, Sadiq Khan, published his draft London Environment Strategy, public consultation on these plans is now open until 17 November 2017. The guidance aims to make London is greener, cleaner and ready for the future. However, as this strategy was submitted after the 2017 and is still under consultation, this does not affect the assessments as presented in the 2017 ES.

² Greater London Authority, 2017. Homes for Londoners, Affordable Housing and Viability Supplementary Planning Guidance

³ Greater London Authority, 2017. London Environment Strategy, Draft for Public Consultation

*Local Policy:**Camden Local Plan Submission Draft (2016)⁴.*

On 3 July 2017, the LBC adopted the Camden Local Plan as a development plan document. Therefore, the adopted plan has replaced the Core Strategy and Camden Development Policies documents. The local plan supersedes the policies in the core strategy and development policies referred to in the 2017 ES. There have been minor amendments to the adopted Local Plan since the 2016 draft; however, none of these policy amendments affect the EIA methodology adopted in the 2017 ES and in this letter.

Draft Camden Goods Yard Planning Framework (2017)⁵

The Camden Goods Yard Planning Framework was adopted by the LBC in July 2017.- The adopted framework has no material effect the EIA methodology adopted in the 2017 ES and in this letter.

3. Summary and Analysis of Environmental Effects

Ramboll Environ and relevant environmental specialists have reviewed the amended proposed development, whilst considering the potential implications for the likely environmental effects identified within the 2017 ES.

3.1 Socio-Economics

Local Economy

The amended proposed development would not result in any amendments in floorspace to the commercial, retail or community spaces. Accordingly, there would be no change to the demolition and construction and completed development employment and apprenticeships generated on-site and the associated productivity and employee expenditure effects generated during both stages.

Therefore, the conclusions previously presented in the 2017 ES remain valid.

Housing Provision

The amended proposed development would not result in any amendments to the residential floorspace or tenure/unit mix. Accordingly, the conclusions previously presented in relation to housing provision, the population and labour force and housing related local authority revenue (New Homes Bonus and Council Tax) in the July 2017 ES remain valid.

Demand for Services

As there would be no change to the residential tenure and commercial floorspace, there would be no change to the resident and workforce population or the child yields presented in the 2017 ES. As such the assessment presented in the 2017 ES in relation demand for education, health, open space and play space requirements would remain unchanged and the conclusions previously presented in the 2017 ES would remain valid.

The increased provision of soft landscaping and provision of a youth recreation facility at the PFS parcel for 5 – 11 and 12+ year olds would enhance the beneficial effect of the amended proposed development

⁴ London Borough of Camden, 2017. Local Plan Adopted Version. London. LBC.

⁵ London Borough of Camden, 2017. Draft Camden Goods Yard Planning Framework. London. LBC.

on open space and play space. Therefore, the July 2017 ES presents a worst-case scenario for these receptors.

Crime

The minor changes of the amended proposed development would improve safety across the proposed development; however, the effects would be imperceptible in respect of crime levels and hence the conclusions previously presented in the July 2017 ES remain valid.

3.2 Transport and Accessibility

Only minor amendments are proposed to the transport and access strategy as summarised above. The Transport Assessment (TA) (ES Volume 3B of the 2017 ES) has been updated in response to the comments made by the LBC and TfL in respect of the proposed development. This included re-modelling the proposed development scenarios with the revised signal junction layout.

The results of the re-modelling exercise show minor changes in resultant queues; however, these changes are insignificant when compared with those reported in the July 2017 ES. The re-modelling also considers the likely effects of reduced flows following implementation of a Travel Plan, which would reduce queuing, and so the significance of effects as presented in the 2017 ES represent a worst-case assessment in this regard.

The following additional information has also been presented in the revised TA:

- Pedestrian Comfort Assessments provided for Juniper Crescent and Chalk Farm Road;
- Further details on the servicing management strategy and swept paths for the PFS parcel; and
- Further details on the cycle parking strategy.

The Travel Plan which was appended to the TA has also been updated to address the junction amendments. The Travel Plan includes updates to provide a wider range of measures to encourage travel by walking/cycling and public transport, particularly for the foodstore, along with associated targets to re-work some of the foodstore parking spaces over time to help minimise demand for car travel.

As stated earlier, the area schedule has not been amended and therefore the trip generation information presented in the 2017 ES remains valid.

Additionally, the assessment of effects once the Proposed Development is completed and occupied presented in the 2017 ES was undertaken for a 2024 opening year which remains valid for the amended proposed development.

Accordingly, the conclusions of the 2017 ES transport and accessibility assessment remain valid for the amended proposed development.

3.3 Air Quality

There have been no amendments to the building heights, massing and trip generation of the proposed development assessed in the 2017 ES, with the exception of the slight reduction in width of the pergola in Block D and minor changes to the roof of Block C.

The on-site CHP has now been replaced by ASHPs, which would present a significant improvement in plant emissions. CHP emissions are higher than ASHP emissions in this respect as set out within the standalone air quality assessment addendum and therefore updated modelling of NO₂ emissions has not been considered necessary. However, the Air Quality Neutral Assessment has been updated. ASHPs are powered by grid electricity as the lead heat source, therefore the updated results show that the Building NO_x Emissions for the amended proposed development are predicted to be 30 kgNO_x/annum compared to benchmarked emissions of 1,886 kgNO_x/annum. As the Building Emissions of NO_x are lower than the benchmark values, the amended proposed development can be considered to be "Air Quality Neutral" in respect of emissions from this source and no further mitigation is necessary. The amended proposed development would be fully compliant with London Plan 2016 Policy '7.14 -Improving Air Quality', and the complementary policy in the Camden Local Plan, Policy 'CC4 - Air Quality'.

Accordingly, the conclusions of the 2017 ES air quality assessment represent a worst case. The Amended Proposed Development would represent an overall improvement to the assessment conclusions for the completed development scenario.

It is noted that as a result of ongoing discussions with the LBC, detailed technical/methodological clarifications have been provided in respect of the separate, standalone air quality assessment that accompanied the application (not the Air Quality Assessment in the 2017 ES). The clarifications have been presented in a standalone air quality assessment addendum which forms part of the consultation material. For completeness, the clarifications, associated responses and potential implications for the air quality 2017 ES chapter can be summarised as follows:

- Roadside emissions in the completed development scenario to be combined with the CHP and traffic emissions results: The original assessments concluded that the impact of the CHP would be insignificant at existing roadside receptors based on the highest predicted concentration from the CHP within 1 x 1 km. Therefore this was initially considered but was not modelled. The standalone air quality assessment addendum shows that the inclusion of this data does not change the conclusions of the standalone air quality assessment and therefore there is no change to the conclusions of the air quality ES chapter.
- The number of car parking spaces and electric charging points to be confirmed: This has been confirmed at 300 for the replacement foodstore, with 61 provided for the temporary store. At least 10% of all foodstore parking spaces (30) will have active vehicle charging points. This does not change the conclusions of the 2017 ES;
- The potential congestion impacts of the proposed development (particularly from the PFS parcel) within the standalone Air Quality Assessment to be modelled: The modelled results presented within the 2017 ES and in the standalone air quality assessment were already based on a worst case 20kph speed limit. Therefore, there are no changes to the 2017 ES;
- The Air Quality Neutral Assessment to be updated to account for including transport and building emissions from the supermarket and the PFS parcel: The updated Air Quality Neutral Assessment confirms that the proposed development still meets the transport emissions benchmarks and therefore no mitigation is required. This therefore does not change the conclusions of the 2017 ES;
- Assumptions considered for the construction phase assessment to determine the risk levels to be provided and the full list of mitigation measures to be outlined: The full list of mitigation measures

have been provided within the standalone air quality assessment addendum. Additionally, following review of the surrounding area and the proximity of nearby sensitive receptors, the sensitivity of the surrounding area and summary of dust risk categories have been updated as below. This corresponds to Tables 8.15 and 8.16 of the 2017 ES Air Quality chapter.

Table 8.15: Sensitivity of the Surrounding Area

Potential Impact	Activity			
	Demolition	Earthworks	Construction	Track Out
Dust Soiling	High	High	High	High
Human Health	Medium	Medium	Medium	Medium

Table 8.16: Summary of Dust Risk

Potential Impact	Activity			
	Demolition	Earthworks	Construction	Track Out
Dust Soiling	Medium Risk	High Risk	High Risk	Low Risk
Human Health	Low Risk	Medium Risk	Medium Risk	Low Risk

This would increase the significance of effects at the initial impact assessment stage in the ES; however, with the application of mitigation measures, the residual effect would remain as **Negligible** and therefore the conclusions of the 2017 ES remain valid.

- Dispersion modelling at a variety of heights and locations across the proposed development and the receptors which would be at greatest risk of plume dispersion impacts to be provided: This has been provided within the standalone air quality assessment addendum. A number of levels have been assessed to account for the decrease in the impact of vehicle emissions with height above ground level versus the increase in the impact of CHP emissions. A number of representative elevations were modelled including the ground floor, fourth floor, ninth floor and fourteenth floor. The predicted concentrations were below the relevant air quality objective at all receptors. Therefore, the conclusions of the 2017 ES remain valid.

3.4 Noise and Vibration

There have been no amendments to the building heights, massing and trip generation of the proposed development assessed in the 2017 ES, with the exception of the slight reduction in width of the pergola in Block D and minor changes to the roof of Block C.

The façade amendments would not materially affect the site’s suitability for residential use.

Furthermore, the minor changes made to the location of plant and the inclusion of ASHP would not alter the rating noise criteria established in the 2017 ES.

Accordingly, the conclusions of the 2017 ES noise and vibration assessment remain valid for the amended proposed development.

It is noted that as a result of ongoing discussions with the LBC, detailed technical/methodological clarifications have been provided in respect of the separate standalone noise assessment that accompanied the application (not the Noise and Vibration assessment within the 2017 ES. Clarifications have been provided in a separate noise and vibration addendum that is included in the consultation material. For completeness, the clarifications, associated responses and potential implications for the noise and vibration 2017 ES chapter can be summarised as follows:

- justification for the baseline survey methodology adopted and the completeness of the data set. This has no implications for the 2017 ES; and
- clarification on the extent of balconies exceeding external amenity noise levels and clarification of potential mitigation options. The 2017 ES assessed the planning drawings as submitted. Should any of the balcony mitigation options be adopted, an improvement in external amenity noise levels would be delivered. The 2017 ES concluded that on balance the exceedance of the external amenity noise levels, taking into consideration the wider benefits of the proposed development and the urban location of the application site, would not be significant.

3.5 Daylight, Sunlight, Overshadowing

There have been no amendments to the height, massing or footprint of the proposed development assessed within the 2017 ES with the exception of the slight reduction in width of the pergola in Block D and minor changes to the roof of Block C. These amendments would not affect the assessment of daylight, sunlight and overshadowing to surrounding properties and therefore the conclusions of the 2017 ES with respect to daylight, sunlight and overshadowing remain valid.

3.6 Internal Daylight and Sunlight

There have been minor amendments to a few residential windows and internal layouts in Blocks D, E2 and F; however, these minor changes would have no material effect on internal daylight and sunlight levels and therefore do not result in a change to the 2017 ES conclusions.

3.7 Solar Glare

The 2017 ES identified the need for amended façade treatment at the PFS building to ensure no significant solar glare effects would arise. Subsequently, façade updates have been made to this building.

An updated solar glare assessment has been undertaken of the updated PFS building which confirms that none of the viewpoints assessed show significant solar reflections from the proposed PFS building with the amended façades in place. Some viewpoints still show reflections on the façade. However, the size of the reflections has been minimised by the mullions. As such, these reflections are not considered to be significant. Therefore, the conclusions presented in the 2017 ES that significant solar glare effects are unlikely to arise, remain valid.

3.8 Light Pollution

The proposed design amendments would have no implication for the levels of light pollution assessed previously and therefore the conclusion outlined on the 2017 ES remains valid.

Accordingly, the conclusions of the 2017 ES daylight, sunlight, overshadowing, solar glare and light pollution assessment remain valid for the amended proposed development.

3.9 Townscape and Visual

Taking into account the minor nature of the amendments, the amended proposed development would continue to have the same effects in respect of each of the views and townscape character areas that were identified for the 2017 ES, and the significance of those effects would be unaltered in each case.

Accordingly, the conclusions of the 2017 ES townscape and visual assessment remain valid for the Amended Proposed Development.

3.10 Built Heritage

As the overall quantum, height, massing and disposition of new built form of the amended proposed development would be the same as with that assessed for the 2017 ES, the proposed amendments under consideration would not have any effects on built heritage assets identified in the 2017 ES (and associated Heritage Statement) due to their nature i.e. minor amendments related to materiality, proportions and fenestration changes and the particular significance of the relevant built heritage assets, including the contribution made by setting to that significance.

Accordingly, the conclusions of the 2017 ES (and associated Heritage Statement), regarding the effect on the significance of the relevant built heritage assets, remain valid for the amended proposed development.

3.11 Wind Microclimate

There have been no amendments to the height, massing or footprint of the proposed development assessed within the 2017 ES, with the exception of the slight reduction in width of the pergola in Block D and minor changes to the roof of Block C. In addition, limited amendments have been made to the public realm and landscaping strategy.

The amendment to the ground floor of the PFS building, now to reflect a more angular shape also does not affect the conclusions of the 2017 ES as this location presented calmer results than required in the first instance.

Given the nature of the proposed amendments, the changes at ground level would not affect the wind microclimate assessment within the 2017 ES. The now accessible rooftop space of the PFS was assessed in the 2017 ES as a non-accessible space, therefore balustrades and landscaping now included in the scheme were not present on the physical model. Conditions on this terrace as per the June 2017 ES include strong winds and uncomfortable conditions. However, the inclusion of the balustrade and landscaping at roof level, would be expected to be beneficial for the wind environment. Further testing would be undertaken during the detailed design to ensure that comfort and safety criteria would be achieved.

Therefore, the wind microclimate assessment conclusions of the July 2017 ES remain valid for the amended proposed development, with the exception of the PFS level 5 rooftop terrace.

Cumulative Effects

As there have been no changes to the assessment of effects for each of the technical chapters listed above, the intra cumulative effects associated with the amended proposed development would remain the same as presented in the 2017 ES.

Inter cumulative effects relating to identified cumulative schemes in the area have been referred to above and need not be considered further. There would be no changes to the assessment as presented in the 2017 ES.

Residual Effects

The residual effects, conclusions and summary of the 2017 ES would remain valid for the amended proposed development. However as outlined above, the design changes in relation to the wind microclimate would still need to be tested during detailed design to ensure no additional adverse results are displayed as a result. There would also likely be an improvement to the air quality conclusions as a result of the change to the energy centre, however the 2017 ES currently presents a worst-case scenario with respect to this. Consequently, no further assessment needs to be undertaken at this stage or additional mitigation measures recommended.

ES Non-Technical Summary

In line with the conclusions above, there will be no changes to the residual effects or assessments undertaken as part of the EIA and therefore the NTS would remain unchanged. However as outlined above, there is the potential that the air quality results presented are a worst case and that the wind microclimate results are subject to further testing during detailed design.

Conclusion

Due to the nature of the amended proposed development, it is considered that there would be no material change to the predicted likely significant environmental effects (deemed as those residual effects of major or moderate significance) set out in the 2017 ES.

Should you or any of the consultees have any questions for clarification, please do not hesitate to contact Sheenagh Mann or Michelle Wheeler at Ramboll Environ.

Yours sincerely

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