

256 GRAYS INN ROAD

ES Review Responses (UCL/Trium, September 2019)

Response Review Report

September 2019

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1.0 INTRODUCTION

- 1.1 CBRE Ltd. was commissioned by the London Borough of Camden (LBC) to provide a review of the Environmental Statement (ES) for the proposed redevelopment of a 1.2 hectares (ha) area of land on the site former Royal Free Hospital located at 256 Grays Inn Road, in the London Borough of Camden. The ES was prepared to support a planning application submitted by University College London (UCL) ('the Applicant') (planning application ref. 2019/2879/P).
- 1.2 An ES Review Report was issued by CBRE in August 2019. The report included a series of requests for clarification. No information was requested under Regulation 25 of the Town and Country (Environmental Impact Assessment) Regulations 2017 (as amended).
- 1.3 In response to the requests for clarification made in CBRE's ES review report, the Applicant submitted an ES Review Response table ('ESRR table') to LBC in September 2019, which is intended to sit as an addendum to the ES. In addition, the Applicant also submitted a report detailing responses to comments from TfL and the GLA on the application proposals.
- 1.4 CBRE has been commissioned by LBC to undertake a review of the ESRR table and other responses, which forms the content of this document.

THE STRUCTURE OF THE APPLICANT'S ESRR TABLE

- 1.5 The Applicant's ESRR table comprises three columns detailing each of the original information request items from CBRE's review; a response to the information requests and a reference number for each item. The Applicant's responses provide an explanation as to how the information requests arising from CBRE's ES review have been addressed in the assessment and resolved.

THE REVIEW REPORT

- 1.6 This document reports the outcome of a review of the Applicant's ESRR table for the proposed re-development of 256 Grays Inn Road, undertaken by CBRE.
- 1.7 The same methodology as that used in the initial ES Review has been applied, including the same criteria-based approach developed by the Institute of Environmental Management and Assessment (IEMA) (hereafter 'the IEMA criteria')¹. For further information on the review methodology, please see Chapter 1 of CBRE's previous ES Review Report.
- 1.8 This report follows the following structure:
 - Chapter 2: Assessment of Clarifications; and
 - Chapter 3: Summary and Conclusions.
- 1.9 Within each section of Chapter 2, the clarifications requested in CBRE's initial ES Review Report are summarised and judgements are made as to the acceptability of the additional information submitted by the Applicant within the ESRR table in meeting the concerns raised.

¹ IEMA EIA Quality Mark: Applicant Guide (March 2014), EIA Quality Mark COM1-6 Review Criteria

2.0 ASSESSMENT OF CLARIFICATIONS

REGULATORY COMPLIANCE

- 2.1 It was confirmed in CBRE’s ES Review document that the ES meets the EIA regulatory compliance criteria and no clarifications were requested.

EIA CONTEXT AND INFLUENCE

Table 2.1

Assessment of Clarifications

SUMMARY OF CLARIFICATION REQUESTED FROM APPLICANT IN ES REVIEW	REASSESSMENT FOLLOWING REVIEW OF APPLICANT’S ESRR TABLE
<p>It is noted that LBC Nature Conservation & Grounds Maintenance recommended in their scoping response that opportunities should be explored by the Applicant to include bird/bat nesting/roosting opportunities within the material of the buildings, rather than through retrofitted boxes. However, it is not stated in the ES or PEA if this has been considered or is proposed. Clarification is requested from the Applicant.</p>	<p>Acceptable</p> <p>The Applicant has confirmed that ecological enhancement measures, including bird and bat boxes, are being considered through the continued design process and will be provided for in the completed Proposed Development, however the number and locations are not currently confirmed. The Applicant will seek to secure these measures through agreement and conditions with LBC.</p> <p>The Applicant also confirms the proposed development will provide areas of green and blue roofs on Plot 1 and Plot 2 and there is potential for provision of a green roof on Frances Gardner House, which is to be determined through further design and feasibility studies in consultation with LBC.</p> <p>No further clarifications are sought.</p>

EIA PRESENTATION

- 2.2 It was confirmed in CBRE’s ES Review document that the ES meets the EIA presentation criteria and no clarifications were requested.

ES CHAPTER 1: INTRO AND EIA METHODOLOGY

- 2.3 It was confirmed in CBRE’s ES Review document that the EIA methodology described in both this ES chapter and the EIA methodology section of the NTS meets the EIA content criteria and no clarifications were requested.

ES CHAPTER 3: PROPOSED DEVELOPMENT

- 2.4 It was confirmed in CBRE’s ES Review document that the Proposed Development described in both this ES chapter and the NTS meets the EIA content criteria and no clarifications were requested.

ES CHAPTER 4: DEMOLITION, CONSTRUCTION AND REFURBISHMENT

- 2.5 It was confirmed in CBRE’s ES Review document that the Demolition, Construction and Refurbishment section in both the ES chapter and the NTS meets the EIA content criteria and no clarifications were requested.

ASSESSMENT OF CLARIFICATIONS

ES CHAPTER 5: SOCIO-ECONOMICS

Table 2.2

Assessment of Clarifications

SUMMARY OF CLARIFICATIONS REQUESTED FROM APPLICANT IN ES REVIEW	REASSESSMENT FOLLOWING REVIEW OF APPLICANT’S ESRR REPORT
<p>It is noted that while Open Space Provision has been considered as a receptor later in the report, it is not included in the Table 5.13. According to Table 5.18, a High sensitivity has been applied to this receptor. However, it is unclear how this sensitivity has been established. Further information is requested from the Applicant as to how the sensitivity of receptor for open space provision has been determined.</p>	<p>Acceptable As requested, the Applicant has provided clarification on the sensitivity of the open space provision receptor in the ESRR report. This is considered to be sufficient. No further clarifications are sought.</p>
<p>It is noted that the net increase in open space area figure has not been provided. In order to allow a comparison with the reported additional open space requirements, the total area of open space proposed to be incorporated into the Proposed Development should be confirmed by the Applicant.</p>	<p>Acceptable The Applicant has confirmed that the proposed development provides a surplus of 1,239 m² of open space, which includes a net increase of 840m² in open space from the existing condition. This is considered to be sufficient. No further clarifications are sought.</p>
<p>The assessment does not appear to have been undertaken on the same receptor-by-receptor-basis as the Proposed Development scenario impact assessment reported earlier in the chapter. For example, cumulative effects on Gross Value Added to Local Economy from Net Additional Employment have not been assessed during the construction phase and cumulative effects on open space provision have not been assessed during the operational phase. It is requested that the Applicant provides the comprehensive inter-project cumulative effect assessment results for each receptor included in Table 5.18 in the chapter on a receptor by receptor basis, including supportive reasoning.</p>	<p>Acceptable ESRR table response reference SE3 sets out a summary of the cumulative assessment associated with each receptor detailed in Table 5.18 of the ES. The explanations are relatively brief but can be considered sufficient due to the lack of publicly available information relating to a number of the cumulative developments. No further clarifications are sought.</p>

ASSESSMENT OF CLARIFICATIONS

ES CHAPTER 6: HIGHWAYS AND TRANSPORT

Table 2.3
Assessment of Clarifications

SUMMARY OF CLARIFICATIONS REQUESTED FROM APPLICANT IN ES REVIEW	REASSESSMENT FOLLOWING REVIEW OF APPLICANT’S ESRR REPORT
<p>It is requested that the Applicant provides a comprehensive set of receptor sensitivity criteria that apply to each receptor type individually. The criteria should relate to the condition of the receptor and not the change to that receptor (which is the impact magnitude). All receptors relevant to each receptor type should be individually listed (e.g. each road link individually) and the sensitivity that has been applied to each should be reported, supported by explanatory reasoning.</p>	<p>Acceptable</p> <p>In the ESRR table, the Applicant has provided criteria for determining the sensitivity of the receptors which are related to the condition of the receptor as requested. A rationale for the sensitivity assigned to each receptor has been provided which is considered to be appropriate.</p> <p>CBRE disagree with the residual effect determined for Leighton Close in relation to ‘collisions and safety’, as it is stated in the ESRR table a ‘negligible effect’ is predicted. Based on the high magnitude for this transport effect, it is considered that the residual impact should be ‘Moderate-Minor adverse’. While this should be noted by LBC, given that the effect would not be significant in EIA terms, no further information is requested from the Applicant in this regard.</p> <p>The effects relating to ‘hazardous loads’ do not appear to take into account the magnitude criteria for this transport impact outlined in Table 6.6 of the original ES, which relates to changes in traffic flows. No reference to change in flows is provided in the impact assessment text in paragraphs 6.199 – 6.205 of the ES. However, as clarification has been provided further down in the ESRR table that the magnitude for hazardous loads has been determined based on waste capacity and not vehicle numbers, no further information is requested from the Applicant. No further clarification is sought.</p>
<p>It is noted that the impact magnitude that has been assessed for each impact on each receptor has not been reported in the chapter and, as such, it is not possible to confirm whether the methodology has been applied consistently across the chapter. It is requested that the Applicant provides the comprehensive detailed impact magnitude results that have been assessed. The results should be provided for all impacts on all receptors on an individual basis. Issues with the receptor sensitivity methodology have been noted in previous comments. It is advised that the Applicant reviews the current impact magnitude criteria in the context of these comments to ensure that they correspond correctly with the revised receptor sensitivity criteria.</p>	<p>Acceptable</p> <p>The Applicant has provided details of the magnitude assigned to each transport impact in the ESRR table with an explanation of the reasoning provided for each receptor (ESRR table ref: HT3). This has been determined based on the magnitude of change set out in Table 6.6 of the ES and is considered to be acceptable. The updated receptor sensitivities have also been taken into account as requested.</p> <p>The ESRR table states a low magnitude can be assigned to hazardous loads with reference to the criteria set out in Table 6.6 of the ES. As noted above, table 6.6 of the ES relates to changes in traffic flow and therefore it is not clear that the ‘hazardous loads’ column in Table 6.6 is actually referring to total waste capacity on site, not traffic numbers. However, confirmation has been provided in the ESRR table response ref HT3, therefore no further information is requested from the Applicant in this regard.</p> <p>No further clarification is sought.</p>

ASSESSMENT OF CLARIFICATIONS

SUMMARY OF CLARIFICATIONS REQUESTED FROM APPLICANT IN ES REVIEW	REASSESSMENT FOLLOWING REVIEW OF APPLICANT'S ESRR REPORT
<p>Effects have not been reported on a receptor by receptor basis. For example, effects on individual road links have not been reported. This information is requested from the Applicant. Issues with the receptor sensitivity and impact magnitude methodology have also been noted in previous comments. It is advised that the Applicant reviews the significance of effect results in the context of these comments.</p>	<p>Acceptable</p> <p>The Applicant has provided a summary of pre and post mitigation effects associated with each transport impact for each receptor.</p> <p>As stated above, CBRE consider that the pre mitigation impact significance for 'Collisions and Safety' on Langton Close should be 'moderate-minor adverse' in line with the assessment matrix (Table 6.7 of the ES), not 'minor adverse' as reported in the ESRR table. While this should be noted by LBC, given that the effect would not be significant in EIA terms, no further information is requested from the Applicant in this regard.</p> <p>No further clarification is sought.</p>
<p>It was noted in the ES review report that the comments raised by TfL in their consultation response should be addressed by the Applicant.</p>	<p>Acceptable</p> <p>Based on the subsequent responses received, TfL have confirmed they are now content with the scope of the transport assessment and that no further trip generation work needs to be undertaken.</p> <p>No further clarification is sought.</p>

ES CHAPTER 7: AIR QUALITY

Table 2.4
Assessment of Clarifications

SUMMARY OF CLARIFICATIONS REQUESTED FROM APPLICANT IN ES REVIEW	REASSESSMENT FOLLOWING REVIEW OF APPLICANT'S ESRR REPORT
<p>It is noted that the significance of effect has not been determined on a receptor by receptor basis as is best practice. The impact descriptors have been detailed for each receptor outside the site, but the resulting significance has not been determined, and neither the impact descriptors or significance is detailed for the receptors inside the site.</p>	<p>Acceptable</p> <p>The Applicant has outlined the guidance followed for the assessment, which states that the impacts can be described at individual receptors, with the overall significance of effects determined based on the range of impacts at individual receptors. This is the approach taken in the ES and can be considered acceptable. The applicant has confirmed that in determining the overall significance for introduced receptors inside the site, consideration has been given to the likelihood of concentrations at the building façades exceeding the Air Quality Objectives in line with the guidance. This approach is considered robust and no further information is requested at this stage.</p> <p>No further clarification is sought.</p>
<p>For the new receptors inside the site, although the ES states the air quality for future occupants within the development will be acceptable, the Applicant is requested to provide a significance of effect grade for each receptor at the site for the combined traffic and energy plant pollutant concentrations (NO₂, PM₁₀ and PM_{2.5} Annual Mean) scenario, to confirm this and to ensure that the assessment meets the requirements of the EIA regulations.</p>	<p>Acceptable</p> <p>ESRR table response ref AQ2 confirms that the significance at each receptor would be defined as 'not significant' as concentrations at all receptors were predicted to be below the relevant objectives. In line with the guidance stated above, this is considered acceptable.</p> <p>No further clarification is sought.</p>

ASSESSMENT OF CLARIFICATIONS

SUMMARY OF CLARIFICATIONS REQUESTED FROM APPLICANT IN ES REVIEW	REASSESSMENT FOLLOWING REVIEW OF APPLICANT'S ESRR REPORT
<p>An assessment of the implications of climate change in relation to the Proposed Development has been provided in the ES chapter; however, this does not address the potential contribution that the development could have to climate change, given it has been determined the development will not be 'air quality neutral'. The assessment only appears to consider the potential for climate change to impact the air quality assessment.</p>	<p>Acceptable</p> <p>The Applicant has signposted to the greenhouse gas assessment that has been included as an appendix to the ES. This assessment provides a quantitative evaluation of the anticipated GHG emissions and contextualises the projects contribution to an existing carbon budget. The assessment states that the predicted GHG emissions arising from the project represent a small proportion of the national GHG emissions and therefore the contribution of the emissions in the context of the budget is deemed to be low. As such it can be considered the ES adequately assesses the implications to climate change in this regard.</p> <p>No further clarification is sought.</p>
<p>It is noted in the text that off-site mitigation can be provided to mitigate potential air quality impacts. Clarification is requested from the Applicant as to why off-site mitigation was not considered to achieve air quality neutrality.</p>	<p>Acceptable</p> <p>It is stated in the ESRR table response ref AQ4 that <i>'it is considered that suitable mitigation to offset the excess building NOx emission should be determined in collaboration with the LBC. This will ensure that a suitable suite of measures that are both achievable by the Proposed Development and which will deliver the necessary improvements are established.'</i></p> <p>This further information is vague and doesn't provide much more detail than the original chapter, however as the Applicant has acknowledged the need to consider suitable mitigation, and providing the local authority are content that these discussions will take place and the mitigation be achievable, then no further detail is requested at this stage. The local authority should also be content around who is responsible for ensuring this is incorporated into the design and implemented.</p> <p>No further clarification is sought.</p>

ES CHAPTER 8: NOISE & VIBRATION

Table 2.5
Assessment of Clarifications

SUMMARY OF CLARIFICATIONS REQUESTED FROM APPLICANT IN ES REVIEW	REASSESSMENT FOLLOWING REVIEW OF APPLICANT'S ESRR REPORT
<p>The ES chapter does not specifically outline the limitations and assumptions associated with the assessment. It is unlikely that a predictive assessment of this nature based on computer modelling did not have any assumptions or limitations and it is important that these are communicated to the reader. Therefore, in order to comply with the EIA regulations, further information is requested from the Applicant as to the specific assumptions used in the assessment of the baseline.</p>	<p>Acceptable</p> <p>The Applicant has provided an additional list of assumptions and limitations in ESRR table response ref NV1, which is considered to be sufficient.</p> <p>No further clarification is sought.</p>

ASSESSMENT OF CLARIFICATIONS

SUMMARY OF CLARIFICATIONS REQUESTED FROM APPLICANT IN ES REVIEW	REASSESSMENT FOLLOWING REVIEW OF APPLICANT'S ESRR REPORT
<p>Regarding construction noise - it is assumed that these criteria relate to daytime noise levels only as no construction or operation of the plant is anticipated at night time. Clarification is requested from the Applicant to confirm if these magnitude of impact descriptors only relate to day time levels.</p>	<p>Acceptable The Applicant has confirmed the assessment relates to daytime levels only as no works are anticipated during the night-time period. This is considered sufficient. No further clarification is sought.</p>
<p>It is noted for the operational plant noise assessment, only receptors R1 to R8 have been considered and reported in the table. There is also potential for the operational plant to impact on receptors R9 and R10 and the Calthorpe Project and St, Andrews Gardens. Clarification is therefore requested from the Applicant as to why these receptors have not been considered.</p>	<p>Acceptable The Applicant has noted that the additional receptors identified have been omitted from Table 8.15 and provided the updated baseline information for these receptors in the ESRR table as requested. No further clarification is sought.</p>
<p>The assessment of construction vibration effects (as reported in paragraph 8.82) states that 'the minimum anticipated distance between noise-sensitive receptors and piling locations is 10m. At a distance of 10m, a PPV of around 0.38 mms-1 is predicted. This would result in low magnitude of impact for the majority of piles'. Clarification is requested from the Applicant as to whether any of the piles that this does not apply to, would result in a higher magnitude of impact and therefore a higher significance of effect than that reported.</p>	<p>Acceptable ESRR table response ref NV4 states that <i>'there are no known piling locations closer than 10m from existing receptors. Therefore, no higher magnitudes are expected to be experienced than those previously outlined and thus no higher significance of effect is predicted'</i>. As such, no further information is requested from the Applicant. No further clarification is sought.</p>
<p>It is noted that the reporting of the completed development effects refers to 'all receptors', whereas in the assessment section in Table 8.15, only receptors R1 to R8 are assessed. As mentioned above, clarification is requested form the Applicant to confirm if all the receptors have been included in the operational noise assessment.</p>	<p>Acceptable The Applicant has provided confirmation that all receptors, including R9 and R10 have been considered in the assessment, and the conclusions reported in the ES are valid for all receptors. This is considered to be sufficient. No further clarification is sought.</p>
<p>It is also unclear why some of the construction phase mitigation measures were included within the assessments reported in the Potential Effects section of the chapter, while others were considered in the Mitigation and Residual Effects section of the chapter. Clarification is requested from the Applicant.</p>	<p>Acceptable ESRR table response ref NV4 provides confirmation that the embedded mitigation was outlined in the Potential Effects section of the ES and additional mitigation required is reported in the Mitigation and Residual Effects section of the ES. This is considered to be an acceptable approach. No further clarification is sought.</p>
<p>As described in previous comments, clarification is requested from the Applicant around the receptors that were included in the operational noise assessment.</p>	<p>Acceptable The Applicant has provided confirmation that all receptors, including R9 and R10 have been considered in the assessment, and the conclusions reported in the ES are valid for all receptors. This is considered to be sufficient. No further clarification is sought.</p>

ASSESSMENT OF CLARIFICATIONS

ES CHAPTER 9: WIND MICROCLIMATE

Table 2.6
Assessment of Clarifications

SUMMARY OF CLARIFICATIONS REQUESTED FROM APPLICANT IN ES REVIEW	REASSESSMENT FOLLOWING REVIEW OF APPLICANT’S ESRR REPORT
<p>It is requested that the Applicant provides the criteria that have been used to establish the significance of effects at offsite receptors.</p>	<p>Acceptable</p> <p>The Applicant has provided confirmation that the Lawson Comfort Criteria has been used to establish the significance of effects for all receptors, including off-site receptors. Through comparison to the baseline wind conditions, a seven-point scale has been used within this assessment to assess the scale of an effect, which relates to the level at which the conditions comply with, or exceed, the Lawson Comfort Criteria. This is considered to be a robust approach.</p> <p>No further clarification is sought.</p>

ES CHAPTER 10: DAYLIGHT, SUNLIGHT, OVERSHADOWING AND LIGHT POLLUTION

- 2.6 It was confirmed in the ES Review document that both the Daylight, Sunlight, Overshadowing and Light Pollution ES chapter and the relevant section of the NTS meet the EIA content criteria and no clarifications were requested.

ES CHAPTER 11: BUILT HERITAGE

Table 2.7
Assessment of Clarifications

SUMMARY OF CLARIFICATIONS REQUESTED FROM APPLICANT IN ES REVIEW	REASSESSMENT FOLLOWING REVIEW OF APPLICANT’S ESRR REPORT
<p>The assessment of pre-mitigation effects is reported in the Potential Effects section of the chapter. Demolition and construction phase and operational phase are assessed separately. A brief, qualitative assessment of demolition and construction phase effects and their significance has been undertaken for this phase. The magnitude of the demolition impact is identified as being negligible; however, no explanation is provided in the chapter as to why this is the case. It is also stated in paragraph 11.148 that the construction process will have a negligible magnitude of impact on Sub-Area 14: Calthorpe Street/Frederick Street and those receptors close to the site. Given the sensitivity of the area, clarification is requested from the Applicant as to why the impact magnitudes are assigned as negligible.</p>	<p>Acceptable</p> <p>The ESRR table provides additional explanation in response to this clarification. The Applicant has provided confirmation that, although additional activity would potentially result in visual and other changes in this area, these would only have a ‘very minor effect on heritage significance’ (definition of negligible magnitude of impact as defined in the ES). This is because their setting either makes no contribution or a very limited contribution to their overall heritage significance of the asset. Where a receptor’s setting does make a limited contribution to its heritage significance, this derives solely from other elements of setting, such as a sense of enclosure, rather than the level of noise or general activity and in the surrounding area. This additional information is considered to be sufficient.</p> <p>No further clarifications are sought.</p>

ASSESSMENT OF CLARIFICATIONS

SUMMARY OF CLARIFICATIONS REQUESTED FROM APPLICANT IN ES REVIEW	REASSESSMENT FOLLOWING REVIEW OF APPLICANT'S ESRR REPORT
<p>The cumulative effects have been assessed for the demolition and construction phase and the completed development. The effects are reported in Table 11.8 in a receptor by receptor basis. Again, a negligible magnitude of impact has been assigned during the construction phase, as noted above, clarification is sought from the Applicant as to why this level has been assigned given the sensitive nature of the area.</p>	<p>Acceptable</p> <p>As stated above the, the Applicant has confirmed that the 'negligible' magnitude has been assigned due to the impact only having a 'very minor effect on heritage significance' (definition of negligible magnitude of impact as defined in the ES). This is considered to be sufficient.</p> <p>No further clarifications are sought.</p>

ES CHAPTER 12: MITIGATION AND MONITORING SCHEDULE

- 2.7 It was confirmed in the ES Review document that the Mitigation and Monitoring Schedule ES chapter meets the EIA content criteria and no clarifications were requested.

ES CHAPTER 13: EFFECT INTERACTIONS

Table 2.8
Assessment of Clarifications

SUMMARY OF CLARIFICATIONS REQUESTED FROM APPLICANT IN ES REVIEW	REASSESSMENT FOLLOWING REVIEW OF APPLICANT'S ESRR REPORT
<p>The significance of the cumulative effects has not been assessed. The authors have stated that 'due to this being subjective... it is not considered appropriate to state whether this possible effect interaction is significant or not'. It was specifically stated in the Scoping Opinion that 'a statement as to whether the effect interaction is considered significant must be made in every case'. It is therefore requested that the Applicant provides a statement as to whether the effect interaction is significant or not for each of the expected effect interactions. Supportive reasoning should also be provided.</p>	<p>Acceptable</p> <p>The applicant has provided additional assessment information in response to this clarification (ESRR table response ref EF1).</p> <p>A qualitative assessment has been undertaken and reported in the ESRR table, which provides a significance of effect reported for each of the predicted effect interactions.</p> <p>No further clarifications are sought.</p>
<p>The significance of the effect interactions during the operational phase have not been reported in the NTS. This section of the NTS should be updated to include this information.</p>	<p>Acceptable</p> <p>ESRR table response ref EF2 provides the additional information requested for the NTS in relation to the significance of the effect interactions. This is considered to be acceptable.</p> <p>No further clarifications are sought.</p>

ASSESSMENT OF CLARIFICATIONS

ES VOLUME II: TOWNSCAPE AND VISUAL ASSESSMENT

Table 2.9

Assessment of Clarifications

SUMMARY OF CLARIFICATIONS REQUESTED FROM APPLICANT IN ES REVIEW	REASSESSMENT FOLLOWING REVIEW OF APPLICANT' S ESRR REPORT
<p>The general approach that has been applied across the ES is that an effect of moderate significance or above is considered significant in EIA terms, however, it is unclear if this approach has also been taken for this assessment. Clarification is requested from the Applicant.</p>	<p>Acceptable The Applicant has provided an additional statement confirming what constitutes a significant effect for this assessment in line with the review comments. No further clarifications are sought.</p>
<p>As stated above, clarification is requested from the Applicant as to what constitutes a significant effect for this assessment.</p>	<p>Acceptable The Applicant has provided an additional statement confirming what constitutes a significant effect for this assessment in line with the review comments. No further clarifications are sought.</p>
<p>Cumulative schemes are discussed in chapter 7 of ES Volume 2, however the developments listed in the chapter do not fully align to the cumulative developments considered in ES Volume 1 Chapter 1. Clarification is therefore requested from the Applicant as to why not all of the cumulative developments identified in ES Volume 1 have been considered in the TVIA.</p>	<p>Acceptable The Applicant has confirmed two cumulative schemes were omitted in error from the ES text, however have now been assessed and fully considered. This additional information is deemed to be sufficient. No further clarifications are sought.</p>

3.0 SUMMARY AND CONCLUSIONS

- 3.1 CBRE has been commissioned by LBC to provide a review of the Applicant’s ESRR table, submitted in response to clarifications prompted by CBRE’s review of the original ES.
- 3.2 Provided in Table 3.1 below is a summary of the outcome of the review. For each topic area, it is indicated where further clarifications have been requested or where information is required in accordance with a Regulation 25 request.
- 3.3 The Applicant has provided all the further information requested as part of the ES review and therefore no outstanding clarifications remain.

Table 3.1
Summary of ESRR Review

TOPIC	CLARIFICATIONS REQUIRED?	REGULATION 25 REQUEST(S) REQUIRED?
Regulatory Compliance	No	No
EIA Context and Influence	No	No
EIA Presentation Criteria	No	No
ES Chapter 1: Intro & EIA Methodology	No	No
ES Chapter 3: Proposed Development		
ES Chapter 4: Demolition, Construction & Refurbishment	No	No
ES Chapter 5: Socio-Economics	No	No
ES Chapter 6: Highways & Transport	No	No
ES Chapter 7: Air Quality	No	No
ES Chapter 8: Noise and Vibration	No	No
ES Chapter 9: Wind Microclimate	No	No
ES Chapter 10: Daylight, Sunlight and Overshadowing & Light Pollution	No	No
ES Chapter 11: Built Heritage	No	No
ES Chapter 12: Mitigation & Monitoring Schedule	No	No
ES Chapter 13: Effect Interactions	No	No
ES Volume II: Townscape & Visual Assessment	No	No

RECOMMENDED NEXT STEPS

- 3.4 It is recommended that Applicant undertakes appropriate and timely consultation with LBC in relation to the ongoing detailed design development and implementation of the proposed mitigation items.