O2 Masterplan Site

Report for – London Borough of Camden & CBRE

Response to CBRE Interim ES Review Report

August 2022

Document Version Control

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1.0	08/2022	Giacomo Ciavatti	Tony Selwyn CEnv	Tony Selwyn CEnv

Report for: **London Borough of Camden & CBRE**

Copy to

115 Southwark Bridge Road **|** London **|** SE1 0AX
+44 (0) 20 7490 7700
webenquiry@plowmancraven.co.uk

https://www.plowmancraven.co.uk/

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1.0 Introduction

1.1 Background

1.1.1 In January 2022, LS Finchley Road Limited (hereafter referred to as the 'Applicant') submitted a hybrid Planning Application for the mixed-use redevelopment of a site at Finchley Road, Camden, London, (the 'Site'). The Planning Application was accompanied by an ES (the '2022 ES').

1.1.2 The 2022 ES comprised the following:

- **ES Volume 1** - formed the main body of the ES and was divided into a number of background and technical chapters supported with figures and tabular information detailing the results of environmental investigations, potential effects arising and the proposed mitigation measures. The ES also identified opportunities for social and economic benefit and environmental enhancement;
- **ES Volume 2** - Townscape, Visual and Built Heritage Impact Assessment (THVIA);
- **ES Volume 3A** - Technical Appendices to ES Volume 1;
- **ES Volume 3B** – Transport Assessment;
- **Non-Technical Summary of the ES**.

Figure 1.1: Site Boundary

1.2 Interim ES Review Report Response

1.2.1 At the start of the project, the London Borough of Camden (LBC) employed their consultants, CBRE, to carry out a review of the EIA Scoping Report and the 2022 ES. The purpose of the review was to determine whether the 2022 ES meets the statutory requirements of the EIA Regulations and relevant guidance.

1.2.2 On 27th June 2022, CBRE issued their Interim ES Review Report (IRR) of the 2022 ES. The IRR identified a list of clarifications required and a summary of potential requests for further information under Regulation 25 of the EIA Regulations. Whilst additional information has been requested, we are pleased that the IRR is largely supportive of the conclusions reached in the ES.

1.2.3 This Response Report (RR) has been drafted to respond to the IRR and where necessary to the points of clarification and potential Regulation 25 requests. On review of this RR, LBC & CBRE will then issue their Final Review Report (FRR).

1.2.4 For ease, this RR has been broken down into the chapter headings identified in the IRR.

2.0 Regulatory Compliance

2.1 Summary of Clarifications Required

2.1.1 None.

2.2 Summary of Regulation 25 Requests

2.2.1 (a) Cumulative effects are discussed in ES Chapter 17. However, the significance of the anticipated effect interaction on each individual receptor has not been reported. This assessment should be updated so that each individual receptor considered in each technical chapter within the ES is considered individually, with all potential effect interactions identified on each receptor and an overall cumulative effect significance provided for each receptor. Separate assessments for the construction and operational phase should be provided.

2.3 Response

2.3.1 (a) Our response to this can be found in Section 22 of this RR under the heading ‘Review of Chapter 17: Cumulative Effects’.

3.0 EIA Context and Influence

3.1 Summary of Clarifications Required

3.1.1 (a) Information on the public consultation exercise should be provided by the Applicant, including the different aspects of the exercise, key dates, consultees/stakeholders and comments and outcomes.

3.1.2 (b) No information has been provided in the ES in relation to the comments/issues raised by the public or other stakeholders during the public consultation exercise. This information is requested from the Applicant.

3.2 Summary of Regulation 25 Requests

3.2.1 None.

3.3 Response

3.3.1 (a) The Applicant first began engaging with local stakeholders in June 2019 on a previous, smaller masterplan scheme, which considered bringing forward a residential-led development of approximately 900 homes on a podium above the existing O2 Centre car park.

3.3.2 Since then, they have carried out 4Phases of formal consultation on a comprehensive masterplan approach to the Site, each lasting between 4-6 weeks, over 16 month period. This provided plenty of time for residents to view the materials and the phased approach to consultation meant the Applicant could properly consider and incorporate the feedback received into the masterplan between Phases.

3.3.3 The Applicant has ensured, through the provision of a dedicated consultation website, email address, freephone number, surveys, flyers, newsletters, drop-in events, webinars, meetings, Site tours, press adverts, press releases, social media adverts and workshops that stakeholders have had the opportunity to engage with the Project Team and contribute feedback throughout the consultations and in between Phases.

3.3.4 Section 4 of the Statement of Community Involvement (SCI) submitted in support of the application is appended to this RR and provides the detail requested (Appendix 1).

3.3.5 (b) Section 5 of the SCI (Appendix 1) provides a comprehensive overview of the detail as requested.

4.0 EIA Presentation

4.1 Summary of Clarifications Required

4.1.1 (a) The parameter plans that have informed the assessments in the ES are referenced in Chapter 4, ES Volume I; however, they have not been included within the ES itself. These plans should be provided within the scope of the ES. Readers should not be required to look outside the ES for this vital information that informs the environmental assessments.

4.2 Summary of Regulation 25 Requests

4.2.1 None.

4.3 Response

4.3.1 (a) The Parameter Plans are now appended to this RR (Appendix 2).

5.0 Review of Chapter 1: Introduction

5.1 Summary of Clarifications Required from Applicant

5.1.1 None.

5.2 Summary of Regulation 25 Requests from Applicant

5.2.1 None.

5.3 Response

5.3.1 None.

6.0 Review of Chapter 2: Approach to Assessment

6.1 Summary of Clarifications Required from Applicant

6.1.1 (a) It is stated that 2019 has been used as the basis for the existing baseline scenario for noise and vibration, air quality, and transport, while a baseline year of 2021 has been used for all other assessments. There is no explanation for this differing approach in this chapter. CBRE presume the 2019 year has been used as data from this period is not affected by recent COVID-19 lockdowns. However, clarification is requested from the Applicant. Justification should be provided as to why this approach is robust.

6.1.2 (b) A significance matrix that has been applied to each ES chapter assessment is provided in Table 2.3. While use of a significance matrix is appropriate for many EIA topic assessments, it does not typically suit certain assessments. For example, it was recommended in the Scoping Opinion that wind effects were assessed in the context of the Lawson comfort and safety criteria using the criteria set out in the Wind Microclimate Guidelines for Development in the City of London (City of London Corporation / RWDI, 2019). These criteria do not include use of a significance matrix and therefore we would not recommend using a significance matrix for this assessment. Where this has been identified as an issue in any of the technical ES chapters, comments are provided within the equivalent ES review chapter in this document.

6.1.3 (c) It is stated in Paragraph 2.7.2 that "the technical assessments carried out for the purposes of assessing the THVIA, Wind and Daylight / Sunlight have been based on a building footprint that sits within the maximum parameters as defined by Parameter Plan 03". This statement is rather unclear, particularly given the use of limits of deviation for the development plots and public realm. Clarification is requested from the Applicant. Where assessments have not been based on a clear line denoting the maximum potential footprint of each building, a plan(s) should be provided clearly illustrating what lines have informed the assessments and comprehensive justification should be provided to explain why the Applicant considers the approach taken to be robust.

6.2 Summary of Regulation 25 Requests from Applicant

6.2.1 None.

6.3 Response

6.3.1 (a) Yes, 2019 was used as it was not affected by lockdowns. This was considered to provide a robust scenario, as opposed to using data from 2020 / 2021.

6.3.2 (b) Noted and agreed. This is specifically addressed in Section 17 'Wind' of the RR.

6.3.3 (c) For clarity, for the Outline Plots, the assessment has been based on a building footprint as depicted by the Development Plot boundary in Parameter Plan 111 (Now provided in Appendix 2).

6.3.4 As noted, though, Parameter Plan 103 indicates limits of deviation up to +3m or -3m for some Development Plot boundaries, whilst maintaining the fixed width of public realm. On the basis of these limits of deviation, and because it is not possible to assess all of the possible locations of the buildings within the limits of deviation due to the number of permutations this would involve, the technical assessments carried were carried out on the basis of the building footprint explained above. This was covered in further detail in the respective technical chapters.

6.3.5 As highlighted in the technical assessments, it is considered that the type and/or magnitude of the effects that are likely to be experienced as a consequence of the Proposed Development will not differ materially as a result of a form of development coming forward on a different building footprint which sits within the permitted deviation of the building lines contained in the Parameters Plans and Design Guidelines. However, in order to ensure that whatever form of development that comes forward is properly assessed, it is proposed that a condition is imposed on the planning permission to be granted for the Proposed Development requiring that reserved matters are accompanied by a statement confirming that the effects remain as assessed or, if they do not, a supplementary environmental statement which assesses any new or different significant impacts. This will ensure that LBC as the local planning authority is provided with all necessary information when it determines the reserved matters submission.

7.0 Review of Chapter 3: Alternatives

7.1 Summary of Clarifications Required from Applicant

7.1.1 None.

7.2 Summary of Regulation 25 Requests from Applicant

7.2.1 None.

7.3 Response

7.3.1 None.

8.0 Review of Chapter 4: The Proposed Development

8.1 Summary of Clarifications Required from Applicant

8.1.1 (a) Parameter plans are referenced in multiple locations in the chapter that have not been included within the ES itself. These plans should be provided within the scope of the ES. Readers should not be required to look outside the ES for this vital information that informs the environmental assessments.

8.1.1 (b) The labelling of figures related to the outline parts of the scheme is often unclear in the chapter. It is often unclear whether the figure is showing the scheme parameters or just illustrative information that cannot be relied upon. For example, it is unclear whether the detail shown in Figures 4.1, 4.13, and 4.14 is illustrative or parameter information. Based on a thorough review of the rest of the chapter and our EIA experience, CBRE can surmise that this is likely to be illustrative only. However, to a reader with less experience of EIA and planning, this is likely to be quite confusing. This should be clarified by the Applicant and, in future, it is advised that figures should be labelled more clearly.

8.2 Summary of Regulation 25 Requests from Applicant

8.2.1 None.

8.3 Response

8.3.1 (a) The Parameter plans have now been appended to this RR (Appendix 2).

8.3.2 (b) Yes, Figures 4.1, 4.13 & 4.14 are illustrative only. Noted for future figures that labelling will clarify this.

9.0 Review of Chapter 5: Demolition & Construction

9.1 Summary of Clarifications Required from Applicant

9.1.1 (a) The keys that accompany figures 5.4 to 5.6 are so small that they are not legible. These should be re-provided in a legible form.

9.2 Summary of Regulation 25 Requests from Applicant

9.2.1 None.

9.3 Response

9.3.1 (a) These figures are re-provided as Appendix 3 to the RR.

10.0 Review of Chapter 6: Noise and Vibration

10.1 Summary of Clarifications Required from Applicant

10.1.1 (a) While impact magnitude has generally been assessed on an individual receptor by receptor basis, effect significance has not been reported for each receptor individually. As a minimum, Table 6.32 should be updated setting out the significance of all individual effects on each receptor.

10.2 Summary of Regulation 25 Requests from Applicant

10.2.1 None.

10.3 Response

10.3.1 (a) An updated Table 6.32 is provided below, setting out the significance of all individual effects on each receptor.

DESCRIPTION OF SIGNIFICANT EFFECTS	RECEPTORS	SIGNIFICANCE OF EFFECTS					SUMMARY OF MITIGATION / ENHANCEMENT MEASURES	SIGNIFICANCE OF RESIDUAL EFFECTS					RELEVANT POLICY	RELEVANT LEGISLATION
		MAJOR / MODERATE / MINOR / NEGLIGIBLE	POSITIVE / NEGATIVE	P / T	D / I	ST / MT / LT		MAJOR / MODERATE / MINOR / NEGLIGIBLE	POSITIVE / NEGATIVE	P / T	D / I	ST / MT / LT		
Demolition & Construction														
Noise from construction works	1 & 2	Major	Negative	T	D	ST	Standard measures to be contained in CMP including noise monitoring	Major	Negative	T	D	ST	NPPF and NPSE	Control of Pollution Act
	3, 4, 6 & 24	Moderate	Negative	T	D	ST	Standard measures to be contained in CMP including noise monitoring	Moderate	Negative	T	D	ST	NPPF and NPSE	Control of Pollution Act
	5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22 & 23	Minor	Negative	T	D	ST	Standard measures to be contained in CMP including noise monitoring	Minor	Negative	T	D	ST	NPPF and NPSE	Control of Pollution Act
Vibration from construction works	2	Major	Negative	T	D	ST	Standard measures to be contained in CMP including vibration monitoring	Moderate	Negative	T	D	ST	NPPF and NPSE	Control of Pollution Act
	1, 3, 4, 5, 8, 10, 11, 12, 13, 14, 24	Moderate	Negative	T	D	ST	Standard measures to be contained in CMP including vibration monitoring	Minor / moderate	Negative	T	D	ST	NPPF and NPSE	Control of Pollution Act
	6, 7, 9, 15, 18, 19, 21, 22, 23	Minor	Negative	T	D	ST	Standard measures to be contained in CMP including vibration monitoring	Negligible / minor	Negative	T	D	ST	NPPF and NPSE	Control of Pollution Act
Noise from construction traffic	1-24	Negligible	Positive	T	D	ST	CLP	Negligible	Positive	T	D	ST	NPPF and NPSE	
Operation														
Operational road traffic noise	1-24	Negligible	Positive	P	D	LT	None necessary	Negligible	Positive	P	D	LT	NPPF and NPSE	
Building services noise	24	Major	Negative	P	D	LT	Acoustic packs for ASHPs. Plant sound power level maxima.	Minor	Negative	P	D	LT	NPPF and NPSE	
	6, 8, 16 & 17	Moderate	Negative	P	D	LT	Acoustic packs for ASHPs. Plant sound power level maxima.	Minor	Negative	P	D	LT	NPPF and NPSE	

	1, 5, 15	Minor	Negative	P	D	LT	~~Acoustic packs for ASHPs.~~ Plant sound power level maxima.	Negligible	Negative	P	D	LT	NPPF and NPSE	
	2, 3, 4, 7, 9, 10, 11, 12, 13, 14, 18, 19, 20, 21, 22 & 23	Negligible	Negative	P	D	LT	Acoustic packs for ASHPs. Plant sound power level maxima.	Negligible	Negative	P	D	LT	NPPF and NPSE	
Internal noise levels within Proposed Development	24	Minor	Negative	P	D	LT	Embedded mitigation of MVHR and acoustic performance spécifications for glazing.	Minor	Negative	P	D	LT	NPPF and NPSE	
External noise levels across Proposed Development	24	Minor	Negative	P	D	LT	Embedded mitigation of specific areas providing occupants with quiet external space	Minor	Negative	P	D	LT	NPPF and NPSE	
Vibration levels across Proposed Development	24	Negligible	Negative	P	D	LT	None necessary	Negligible	Negative	P	D	LT	NPPF and NPSE	

11.0 Review of Chapter 7: Air Quality

11.1 Summary of Clarifications Required from Applicant

11.1.1 (a) The Air Quality Neutral assessment is not included within the chapter, which is not in accordance with what was agreed through the EIA Scoping Process. We request that the Applicant clarifies the reason for its omission.

11.1.2 (b) No mention is made of the existing sensitive receptors in the area. We would expect this information to be provided in the chapter. This should be provided by the Applicant.

11.1.3 (c) The methodology section includes a section at paragraph 7.4.4 on Effect Significance with effects ranging from Major Positive/Negative to Negligible. However, paragraph 7.4.5 then states that the significance effect will be determined based on whether or not the air quality assessment level (SQAL) has been exceeded or not. Where it is exceeded, this would be considered a substantial impact and the effect would be significant. Where there is no exceedance, the impact would be negligible and not significant. The methodology employed in the assessment relates to the latter and no mention is made of Minor/Moderate/Major Effects. Clarification on the approach is requested from the Applicant. For future reference, the methodology section should be made clearer to the reader and avoid providing multiple means of determine and reporting effect significance.

11.1.4 (d) The methodology section includes a section at paragraph 7.4.4 on Effect Significance with effects ranging from Major Positive/Negative to Negligible. However, paragraph 7.4.5 then states that the significance effect will be determined based on whether or not the air quality assessment level (SQAL) has been exceeded or not. Where it is exceeded, this would be considered a substantial impact and the effect would be significant. Where there is no exceedance, the impact would be negligible and not significant. The methodology employed in the assessment relates to the latter and no mention is made of Minor/Moderate/Major Effects. Clarification on the approach is requested from the Applicant. For future reference, the methodology section should be made clearer to the reader and avoid providing multiple means of determine and reporting effect significance.

11.1.5 (e) The assessment of demolition and construction effects and operational effects on future proposed receptors identifies that there would be substantial adverse and significant effects in the absence of mitigation. The mitigation proposed in both cases is mechanical ventilation with ISO Epm2.5 filtration of over 50% at all air intakes. With these measures incorporated, the effects would be negligible and not significant. It is requested that the Applicant confirm that these measures are incorporated into the detailed designs and that they would be implemented in the future outline components.

11.2 Summary of Regulation 25 Requests from Applicant

11.2.1 None.

11.3 Response

11.3.1 (a) London Plan Guidance (Draft November 2021) on Air Quality Neutral (Section 2.2.1) does not require an air quality neutral assessment for developments that will not lead to an increase in vehicle movements and don't include new combustion sources. Therefore, in line with this an air quality neutral assessment was not undertaken as the Proposed Development will not include any new energy combustion plant under typical operation and existing plant will be removed therefore there will a net reduction in building emissions. There will be a significant reduction (2,159 annual average daily traffic (AADT)) in traffic generated by the Proposed Development compared to the existing development therefore there will be a reduction in transport emissions generated by the Site. Therefore, the Proposed Development will be better than air quality neutral when compared to its existing use offering a benefit to existing receptors in the local area due to reductions in both building and transport related emissions. Nevertheless, an Air Quality Positive Statement was prepared instead after consultation with LBC as a separate standalone document that was submitted as part of the planning application. This is appended to this RR for completeness (Appendix 4).

11.3.2 (b) In section 7.11.5 of Chapter 7, it is explained that as the Proposed Development is removing a significant number of existing vehicle trips in the vicinity of the Site and that there will be no negative significant impact to existing air quality at local receptors. The reduction in trips generated by the Proposed Development compared to the existing site is 2,159 AADT. As such a quantitative assessment of impacts at existing receptors was not considered necessary as there will be an improvement in air quality as a result of the Proposed Development. This approach was set out in the consultation email sent to LBC (07/10/2021), see Appendix 7.1 of the ES Chapter. As a quantitative assessment at existing receptors was not undertaken it was not necessary to include reference to specific individual receptors.

11.3.3 (c) For clarity, where a substantial impact has been determined based on an exceedance of the AQAL this would lead to a major negative effect, where there is no exceedance there is a negligible effect. Where there is an exceedance of the AQAL, a major negative effect this relates to a significant effect and requires mitigation. Where there is no exceedance of the AQAL, a negligible effect this is not significant, and no mitigation is required. This clarification of terminology does not change the outcome of the assessment and the effect significance remains the same and suitable mitigation has recommended where appropriate.

11.3.4 (d) Same response as for (c) above.

11.3.5 (e) The recommendation for PM2.5 filtration is based on compliance with the WHO guidelines, the GLA have advised they would not enforce compliance with these guidelines on a site specific basis due to elevated PM2.5 concentrations being a London-wide regional problem and not a site specific issue. Nevertheless, we can confirm that these measures are incorporated in the detailed design of the detailed Plots and would be implemented for the outline plots too.

12.0 Review of Chapter 8: Transport

12.1 Summary of Clarifications Required from Applicant

12.1.1 (a) Section 8.7 covers the future baseline. This section makes reference to TfL's aspiration to increase the Jubilee line capacity, but noting that these improvements have not yet been realised. It is not clear how the Applicant has considered this as part of the future baseline. I.e. has it been excluded from consideration to reflect a conservative approach to the assessment? We would also expect to see further detail here regarding predicted changes in background traffic levels on the highway network between the time of the assessment and the point that the proposed development is complete and operational. By comparison, we note that the Air Quality assessment clearly states that a worst case approach has been adopted for the future baseline whereby traffic flows and emission factors from 2019 have been used, rather than those for the anticipated year of opening of 2027 on the basis that the baseline traffic flows are predicted to decrease over time and because the proposed development will lead to a net reduction of traffic generated by the application site. We would expect to see a similar statement within the Transport and Access chapter. This should be provided.

12.1.2 (b) The assessment section makes no reference to the sensitivity of receptors or to the magnitude of impact. Consequently, it is not clear to the reader as to how the scale of effect has been derived. It is also noted that following the determination of the scale of effect, it is not made clear as to whether the effect is considered significant or not. This should be clarified by the Applicant.

12.2 Summary of Regulation 25 Requests from Applicant

12.2.1 None.

12.3 Response

12.3.1 (a) As a conservative approach, the assessment does not account for the potential increase in Jubilee line capacity. As set out in the ES Scoping, no general background growth or reduction has been accounted for within the future baseline traffic flow. This reflects the trend across central London of traffic flows generally remaining similar or reducing. ATC and manual traffic surveys on Finchley Road as reported in DfT Road Traffic Statistics are summarised in the table below and report a reduction in traffic flow since 2017 to 2019. 2020 data is reported for context. It is acknowledged that travel restrictions may have influenced this activity but does suggest a continued trend of similar or lower traffic flows in the area.

		Annual Average Daily Flow (Vehs)						
Year	**Source**	**Pedal Cycles**	**Two-wheeled motor vehicles**	**Cars and taxis**	**Buses and coaches**	**Light Goods Vehs**	**Heavy Goods Vehs**	**All Motor Veh**
2017	Manual Count	418	1270	36313	1782	8504	1191	49061
2019	Manual Count	340	1165	32540	1471	6881	931	42988
2020	ATC	421	1023	28616	1424	6998	935	38996

Committed developments identified as being relevant to the assessment were reviewed and found to also have a negligible impact on the local network. The assessment presented within Chapter 8 of the ES considers the impact of the proposed development and acknowledges the benefit associated with the forecast net reduction in traffic flow from / to the site as a result of development.

12.3.2 (b) The ES scope included discussion of sensitivity of receptors, magnitude of change and magnitude of significance (pg 47/48). This is replicated below as clarification. Section 8.5.4 within the ES defines that 'moderate and major effects are considered to be significant' and Table 8.9 summarises the significance of effects with and without mitigation including factors such as:

- Scale (major/moderate/minor/negligible)
- Magnitude (positive/negative)
- permanent / temporary
- Direct / Indirect
- Short-term / Medium-term / Long-term.

From ES Scoping Page 47/48:

<u>Sensitivity of Receptors</u>

The potential receptors are those people making journeys within the relevant study area for each mode. For each effect to be assessed, receptors are identified in each study area. The sensitivity of receptors for transport effects will be defined as follows:

- ***Negligible** – receptors which are very lightly used (by all users or particularly by vulnerable road users) relative to other receptors within the study area or those which have a very high capacity to accommodate change without significant effects arising;*
- ***Low** – receptors which are lightly used (by all users or particularly by vulnerable road users) relative to other receptors within the study area or those which have a high capacity to accommodate change without significant effects arising;*

- ***Moderate*** *– receptors which are used (by all users or particularly by vulnerable road users) to an average level relative to other receptors within the study area or those which have a moderate capacity to accommodate change without significant effects arising; and*
- ***High*** *– receptors which are heavily used (by all users or particularly by vulnerable road users) relative to other receptors within the study area or those which have a low capacity to accommodate change without significant effects arising.*

Magnitude of Change

For each effect to be assessed, criteria for assessing magnitude of change are defined in this section. Broadly, the magnitude of change for transport effects will be defined as follows:

- ***Negligible –*** *changes which are unlikely to be perceptible;*
- ***Small*** *– changes which are likely to be perceptible but not the extent that it would materially change conditions which would otherwise prevail;*
- ***Medium*** *– changes which are likely to be perceptible and which would materially change conditions which would otherwise prevail to the extent that it may affect travel behaviour to a measurable degree; and*
- ***Large*** *– changes which are likely to be perceptible and which would significantly change conditions which would otherwise prevail to the extent that it would significantly affect travel behaviour.*

Magnitude of Significance

The Magnitude of Significance is determined through the combination of Sensitivity Receptor and Magnitude of Change. The table below sets out how these categorisations will be combined.

		Magnitude of Change			
		Negligible	***Small***	***Medium***	***Large***
Receptor Sensitivity	***Low***	*Negligible*	*Minor*	*Minor*	*Moderate*
	Medium	*Negligible*	*Minor*	*Moderate*	*Moderate*
	High	*Negligible*	*Moderate*	*Moderate*	*Major*

13.0 Review of Chapter 9: Flood Risk & Drainage

13.1 Summary of Clarifications Required from Applicant

13.1.1 None.

13.2 Summary of Regulation 25 Requests from Applicant

13.2.1 None.

13.3 Response

13.3.1 None.

14.0 Review of Chapter 10: Ground Conditions

14.1 Summary of Clarifications Required from Applicant

14.1.1 (a) No mention is made of the magnitude of impact throughout the assessment. As the scale of effect is derived from the sensitivity of the receptor and the magnitude of the impact, this omission results in a lack of transparency and repeatability. The Applicant is requested to update the assessment to clearly identify the sensitivity of receptor, the magnitude of the impact and hence the scale of effect and, importantly, whether that effect is significant or not.

14.2 Summary of Regulation 25 Requests from Applicant

14.2.1 None.

14.3 Response

14.3.1 (a) Updated Chapter 10 with track changes is provided, including a reference to the magnitude of change (Appendix 5).

15.0 Review of Chapter 11: Archaeology

15.1 Summary of Clarifications Required from Applicant

15.1.1 (a) Within the 'Effect Significance' section, it is not made clear what scale of effect is considered to be significant. It is assumed that this would be moderate and major, with minor and negligible being not significant, but we request that the Applicant confirm this to be the case.

15.1.2 (b) The assessment does not clearly set out the magnitude of impact for each element of the works considered as having the potential to result in significant effects on the heritage assets identified. Furthermore, the assessment combines all works and assets into a single combined assessment, resulting in a lack of transparency. It is requested that the Applicant provide further detail in their assessment such that the reader can clearly follow how the conclusions drawn in Table 11.6 have been derived.

15.1.3 (c) As above, clarification is sought as to how the significance of effect has been determined and how effect is altered following the implementation of the proposed mitigation as the assessment presented in section 11.10 and Residual effects table 11.6 do not align.

15.1.4 (d) The anticipated significance of the archaeological effects has not been stated in the Archaeology section or in the summary residual effects table, provided in Table 7.2. The NTS should be updated to include this information.

15.2 Summary of Regulation 25 Requests from Applicant

15.2.1 None.

15.3 Response

15.3.1 (a) Yes, Significant would be Moderate and Major, and Not Significant would be Minor and Negligible. This has been included in Section 11.6.5 in an updated Chapter 11 (Appendix 6).

15.3.2 (b) This has been included in an updated Chapter 11 (Appendix 6).

15.3.3 (c) See above, plus the process of offsetting the Negative Effects of the impacts (by means of an approved programme of archaeological investigation, recording, and the appropriate dissemination of the results) is considered to reduce the Effect by one level, thereby each becomes Minor or Negligible (Not Significant). Noted that Section 11.10 and Table 11.6 do not align and an updated Chapter 11 is provided in Appendix 6.

15.3.4 (d) Updated NTS included in Appendix 7.

16.0 Review of Chapter 12: Daylight, Sunlight & Overshadowing

16.1 Summary of Clarifications Required from Applicant

16.1.1 (a) It is not specifically stated that the sensitivity of all receptors is considered to be high, although this is assumed to be the case. This should be clarified by the Applicant.

16.1.2 (b) Clarification is sought regarding the assessment of Asher House. It is understood that the assessment has been based on the existing building, but the Applicant has noted that a planning application has been submitted for "Demolition of [the] existing building and [the] construction of three buildings between 1 and 9 storeys (plus basement) in height comprising 53 residential dwellings, 4,797sqm of commercial floorspace, publicly accessible space, landscaping and resident's facilities including cycle and refuse facilities". The Applicant goes on to say that as the application has not been determined, "it is not incorporated within our Future Baseline (Cumulative) assessments". However, the assessment appears to then focus on the proposed Asher House scheme, rather than the existing building. From the assessment presented and the conflated narrative around the existing and proposed Asher House schemes, It is not clear what the impact is to the existing Asher House property.

16.2 Summary of Regulation 25 Requests from Applicant

16.2.1 None.

16.3 Response

16.3.1 (a) All listed receptors are considered to have high sensitivity.

16.3.2 (b) The impacts to the existing Asher House is either Moderate or Major Negative. (See para 12.9.32).

16.3.3 The purpose of referring to the proposed Asher House scheme is to show that should if it is to be redeveloped, as it is proposed to be, both the existing building and the proposed Asher House development would receive similar and acceptable levels of daylight.

16.3.4 When considering whether the Moderate or Major Adverse effects could be considered acceptable, we consider it is relevant to have regard to the Asher House development proposals. This is because the Asher House proposals remove any ground floor residential accommodation (so any impacts experienced now will be short lived), and as both buildings will be of a similar size, they will each receive a similar and acceptable level of daylight for an urban area.

16.3.5 The conclusion that is reached therefore is that whilst the effects are up to a major adverse effect, we consider the effects, when you take into account the desire to redevelop this adjacent site can be considered acceptable.

17.0 Review of Chapter 13: Wind Microclimate

17.1 Summary of Clarifications Required from Applicant

17.1.1 (a) The CFD results for the baseline scenario are shown in Figures13.5 and 13.6. The resolution of the image is poor, as is the case with all the images presented in this chapter, and the red line boundary is not indicated so it is difficult to establish which receptor points fall within the site and which fall outside it. This differentiation is important as the proposed development impact assessment methodology for locations outside the site includes a consideration of any changes in wind conditions from the baseline. It is requested that the Applicant provides better-quality images, including the red line boundary so that it is clearly indicates what the baseline results are for all receptor points outside the site boundary.

17.1.2 (b) In describing the receptor locations, no reference is made to off-site above ground level receptors, bus stops and pedestrian crossings. Clarification is sought as to whether these are present within the study area. If they are present then these need to be identified and assessed.

17.1.3 (c) As per the comment above, clarification is sought regarding all potentially sensitive receptor locations.

17.1.4 (d) It is recommended that paragraphs 13.7.2 and 13.7.5 (which set out the Magnitude of Change and Significance of Effect Criteria) be removed as these are not aligned with the CoL Criteria and that instead the assessment referrers only to the Significance Criteria set out in Tables 13.3 and 13.4, which is aligned with the CoL criteria. Including both creates confusion as to the assessment method used.

17.1.5 (e) The assessment process and the method for determining the significance of effect is not sufficiently transparent. It is requested that the Applicant provides a target use plan which denotes areas to be used for throughfares, entrances, seating etc. Without this, or something similar, we are unable to confirm that the conclusions drawn, particularly in respect of the conditions at ground level both off-site and on-site, are accurate. In the event that this can not be provided as the intended use of the public realm is not known, this should be stated in the assumptions and limitations section and further details should be included in the assessment to highlight particular areas that would not be appropriate for certain uses, which should be accounted for in developing the detailed designs at the RMA stage.

17.1.6 (f) It is not clear whether the assessment of the proposed development is based on a worst case interpretation of the proposed development. Clarification is requested. Similarly, it is not clear as to how the landscape area is addressed within the detailed component of the site.

17.1.7 (g) As above, clarity is sought regarding the significance criteria adopted throughout the assessment.

17.1.8 (h) It is unclear as to whether any specific wind mitigation was tested and incorporated within the detailed design proposals. Clarification on this point is requested.

17.1.9 (i) In respect of the outline component, additional mitigation is proposed to address locations experiencing unsuitable wind conditions; however, we disagree with the reporting of residual effects given that, to our understanding, the mitigation measures have not been tested. Accordingly, the residual effects need to remain as reported prior to the implementation of possible mitigation, but noting that this is standard procedure for outline schemes and that the wind conditions would, in the opinion of the specialist, be successfully addressed at the detailed design stage and that an appropriately worded condition would be imposed to ensure this further testing is undertaken.

17.1.10 (j) It is unclear as to whether any specific wind mitigation was tested and incorporated within the detailed design proposals. Clarification on this point is requested.

17.1.11 (k) In respect of the outline component, additional mitigation is proposed to address locations experiencing unsuitable wind conditions; however, we disagree with the reporting of residual effects given that, to our understanding, the mitigation measures have not been tested. Accordingly, the residual effects need to remain as reported prior to the implementation of possible mitigation, but noting that this is standard procedure for outline schemes and that the wind conditions would, in the opinion of the specialist, be successfully addressed at the detailed design stage and that an appropriately worded condition would be imposed to ensure this further testing is undertaken.

17.1.12 (l) The Applicant has referred to the expectation around a planning condition requiring further development of the mitigation measures at the detailed design stage. We are in agreement with this, but would recommend that the wording be more explicitly linked to further testing of the scheme either through CFD or wind tunnel testing to ensure the appropriateness of the mitigation measures proposed.

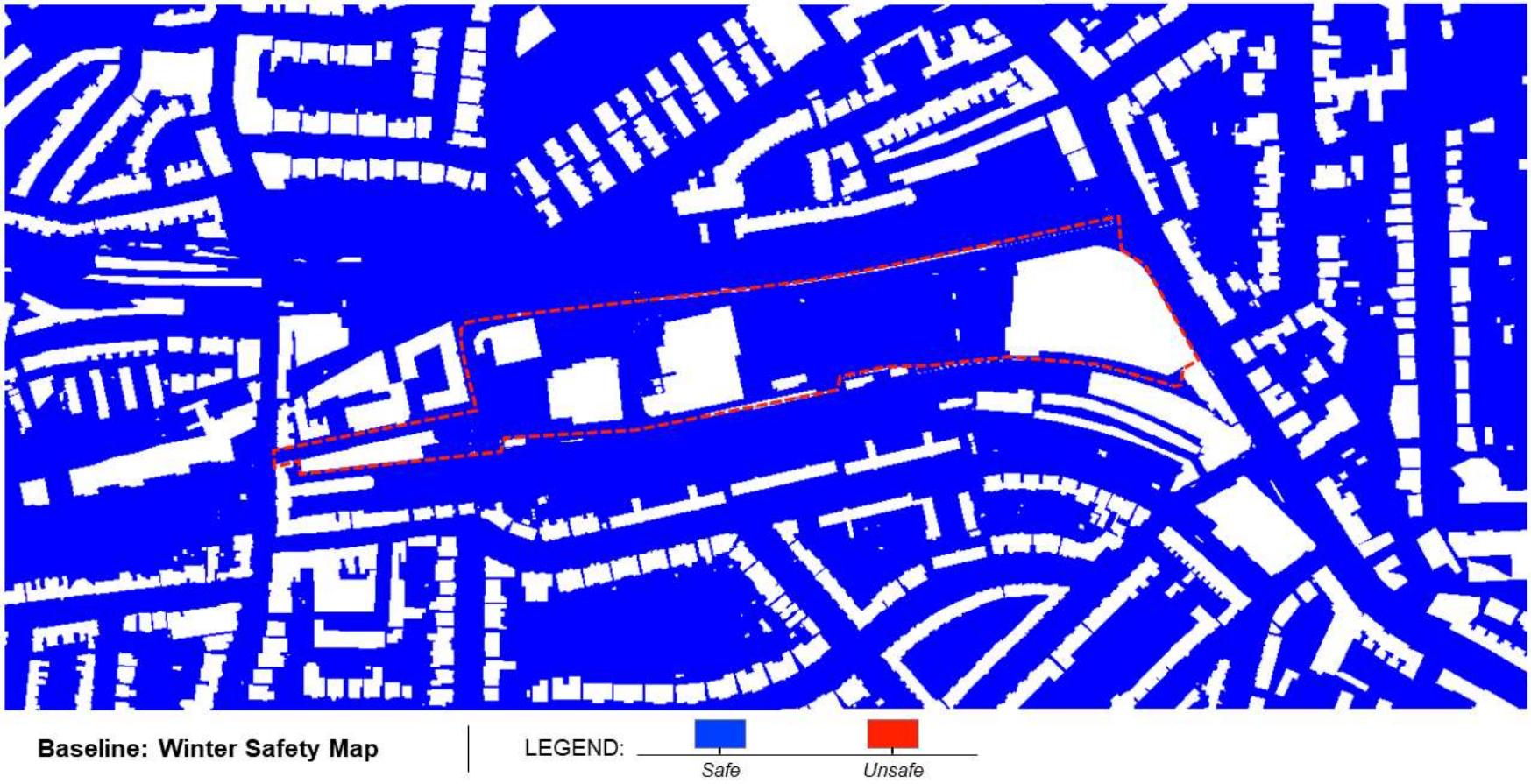
17.2 Summary of Regulation 25 Requests from Applicant

17.2.1 None.

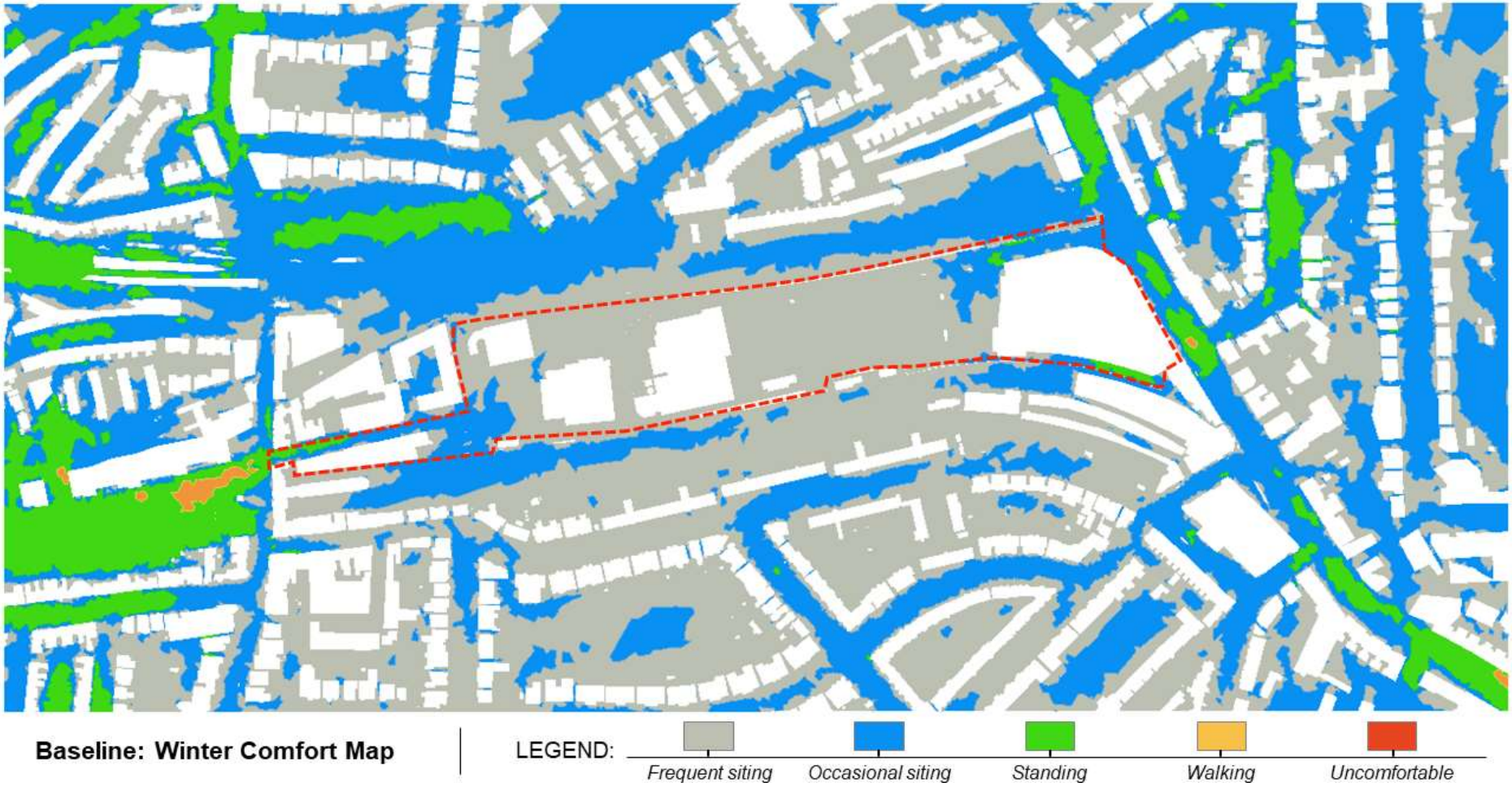
17.3 Response

17.3.1 (a) The Figures below substitute Figures 13.5 and Fig 13.6 in the Chapter 13 Wind Microclimate report, to address higher resolution issues and the lack of the site boundary red line. We have also provided as a sperate Appendix (8a) for clarity. It is also confirmed that all receptors analysed in these two Figures are at ground level.

Substituted Figure 13.5



Substituted Figure 13.6

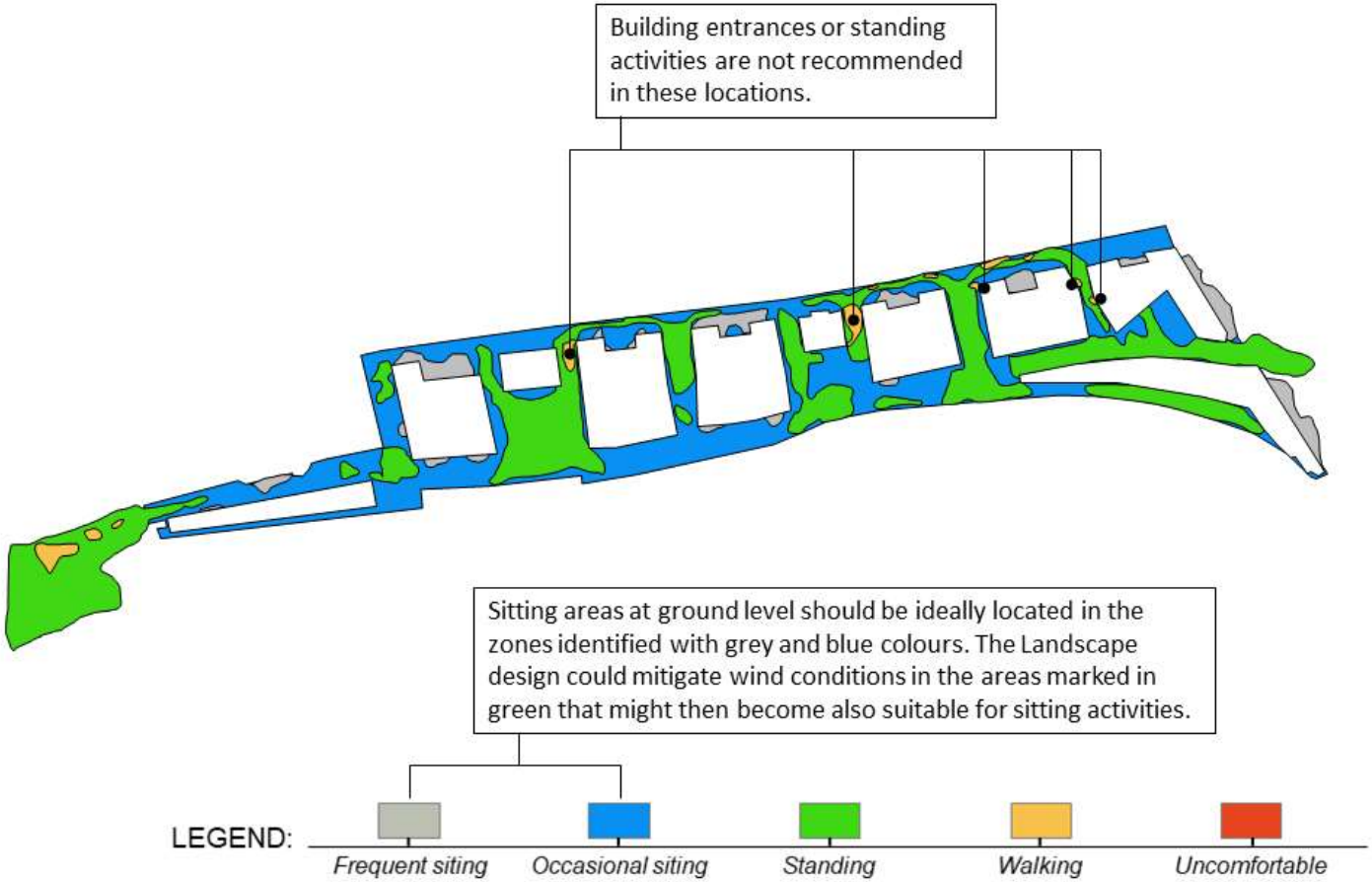


17.3.2 (b) In Off-site surrounding areas, where building massing and pedestrian activity could be altered by the Proposed Development, a direct comparison with the baseline conditions has been carried out. In this assessment however, since the wind conditions of the off-site receptors were unaffected by Proposed Development and/or no safety issues were identified, no off-site receptors have been reported as uncomfortable or unsafe.

17.3.3 (c) Response as above.

17.3.4 (d) Agreed, this has been removed and an updated Chapter provided in Appendix 8b and doesn't affect the outcome of the assessment.

17.3.5 (e) Considering that, "the intended use of the public realm is not fully defined at this stage", "the wind conditions measured would be appropriate providing that the final landscape strategy and building entrances respond to the result of the CFD". The attached Fig. 17.1.1 indicates the areas of the site where sitting, standing and entrances are recommended.


Building entrances or standing activities are not recommended in these locations.
Sitting areas at ground level should be ideally located in the zones identified with grey and blue colours. The Landscape design could mitigate wind conditions in the areas marked in green that might then become also suitable for sitting activities.
LEGEND:
Frequent siting
Occasional siting
Standing
Walking
Uncomfortable

17.3.6 (f) For the Outline Plots, the assessment has been based on a worst case interpretation of the proposed development as depicted by the Development Plot boundary in Parameter Plan 111. The CFD analysis was run without the landscaping included within both the detailed and outline plots.

17.3.7 (g) The recommended action is accepted, as the removal of 13.7.2 and 13.7.5 won't affect the outcomes of the analysis.

17.3.8 (h) The effectiveness of mitigation strategies has not been tested. With regards to the comments 17.16 and 17.17, professional judgement has been utilised to determine that the use of the proposed mitigation strategies would be effective at resolving the Major Negative effects.

17.3.9 (i) The comment is understood and agreed. The residual effects have been updated in an updated Chapter (Appendix 8b). However, based on professional judgement, it is expected that the use of the proposed mitigation is likely to be effective at resolving the Negative effects. This has been reflected in the updated Residual Effects Chapter and NTS – see sections below.

17.3.10 (j) Response as above - point 17.3.8 (h)

17.3.11 (k) Response as above - point 17.3.9 (i)

17.3.12 (l) Proposed wording as follows: It is expected that the development of the mitigation strategies will be conducted at the detailed design stage. In order to validate the effectiveness of the future mitigation strategies a detailed wind analysis, either by CFD or wind tunnel testing, should be carried out at the Reserved Matters stage based on the final designs, to ensure that safe and acceptable comfort conditions are achieved across the site.

18.0 Review of Chapter 14: Ecology

18.1 Summary of Clarifications Required from Applicant

18.1.1 (a) We request that the consultation between the Applicant and the London Wildlife Trust, regarding the reclassification of the species poor hedgerows as introduced shrubs, be shared in order to confirm the London Wildlife Trust's acceptance of the reclassification.

18.1.2 (b) Two descriptions of the significance of effect are provided which are not totally aligned with one another. We have assumed that the description provided in Table 14.6 has been adopted for the purposes of the assessment; however, if that is the case then we request clarification as to how the Applicant concluded a Major Positive effect on habitats during the demolition and construction stage.

18.2 Summary of Regulation 25 Requests from Applicant

18.2.1 None.

18.3 Response

18.3.1 (a) Please see attached (Appendix 9).

18.3.2 (b) For clarity, we had taken the assessment based on the amount of net gain and new habitats being created compared to the baseline, rather than basing it on the scale which aligns with Table 14.6. Following this clarification, we can confirm that the significance of effect should be 'minor positive' as the gains to biodiversity will be on a site, or possible local, scale only. This has been reflected in the updated Residual Effects Chapter and NTS – see sections below.

19.0 Review of Chapter 15: Socio-economics

19.1 Summary of Clarifications Required from Applicant

19.1.1 During the operational stage, the assessment of open space provision concludes that there would be a Minor Negative effect as the proposed development would deliver a deficit of approximately 1.7 ha of open space. According to the matrix, this effect could either have been minor or moderate, based on a medium magnitude of impact and medium sensitivity of receptor. The Applicant has used their professional judgment in determining that the effect would be minor and stated that this is due to the fact that no open space is currently provided on site. We are not wholly in agreement with this argument. The existing site does not deliver open space, but 98% of the open space requirement is driven by the residential accommodation to be delivered by the proposed development, which does not exist at present, and the proposed development is only delivering half of what it is required to deliver. We would consider a Moderate Negative and significant effect to be more appropriate.

19.2 Summary of Regulation 25 Requests from Applicant

19.2.1 None.

19.3 Response

19.3.1 This is agreed and we can confirm that the significance of effect should be 'Moderate Negative' (Significant). This has been reflected in the updated Residual Effects Chapter and NTS – see sections below.

20.0 Review of Chapter 16: GHG & Climate Change

20.1 Summary of Clarifications Required from Applicant

20.1.1 (a) It is noted that the 2017 IEMA guidance above was replaced with new guidance in late February 2022. Given that the new guidance was released following submission of the planning application and use of the previous 2017 guidance had previously been agreed in the Scoping Opinion, alignment with the 2017 guidance is considered acceptable. However, it is recommended that the Authors review the new guidance and confirm that the conclusions of the assessment remain valid in the context of this guidance.

20.2 Summary of Regulation 25 Requests from Applicant

20.2.1 None.

20.3 Response

20.3.1 (a) Yes, we do believe that the conclusions of the assessment remain valid in the context of the latest IEMA Guidance released in early 2022: Assessing Greenhouse Gas Emissions and Evaluating their Significance. The chapter produced follows a similar assessment methodology as set out in the latest guidance.

21.0 Review of ES Volume II: THVIA

21.1 Summary of Clarifications Required from Applicant

21.1.1 None.

21.2 Summary of Regulation 25 Requests from Applicant

21.2.1 None.

21.3 Response

21.3.1 None.

22.0 Review of Chapter 17: Cumulative Effects

22.1 Summary of Clarifications Required from Applicant

22.1.1 (a) [Noise & Vibration] It is unclear from the text, which cumulative schemes are considered to have the potential to result in cumulative noise effects and which have been scoped out from detailed consideration on the basis that they located too far from the site/receptors. Clarification is requested from the applicant and supportive reasoning should also be provided.

22.1.2 (b) [Noise & Vibration] In regard to Receptors 1 and 2, which are both expected to experience major negative effects as a result of construction noise from the proposed development in isolation, it is stated in the text that the cumulative schemes "would not meaningfully worsen the effects at these receptors, as the separation distances are greater." No further justification is provided. Looking at the locations of the cumulative schemes in relation to the receptors, it appears that Scheme 5 is extremely close to Receptor 2 and should their construction phases take place at the same time as the proposed development, there would appear to be the potential for cumulative construction noise effects to arise. The potential for longer duration construction noise effects on Receptor 3 is noted in the text but again, the reasoning and justification for this is minimal. Why is there no potential for a greater cumulative magnitude of change on this receptor? Moderate negative effects, as a result of construction noise from the proposed development in isolation, were also reported for Receptors 4, 6, and 24, yet there is no consideration of cumulative effects on these receptors in this section. Furthermore, many of the cumulative schemes also include residential units, which themselves are sensitive receptors that could be subject to construction noise impacts as a result of the proposed development. Effects on these sensitive receptors should also be assessed. The same deficiencies are noted with the inter-project cumulative construction vibration assessment. The Applicant should provide a more comprehensive inter-project construction noise and vibration assessment, including a significance of effect judgement on a receptor-by-receptor basis, with supportive reasoning.

22.1.3 (c) [Noise & Vibration] The justification provided for not undertaking a detailed inter-project cumulative operational phase services plant noise assessment is generally considered acceptable; however, only one cumulative scheme is referenced. Clarification is requested as to why the other cumulative schemes could not potentially result in a cumulative impact with the proposed development.

22.1.4 (d) [Daylight, Sunlight & Overshadowing] It is stated in the text that only the Land at Midland Crescent cumulative scheme is considered close enough to potentially result in significant effects in combination with the proposed development. All other cumulative schemes have been scoped out from further consideration on this basis. A number of the other cumulative schemes are extremely close to the application site, such as 156 West End Lane. Further clarification is therefore requested from the Applicant as to why the other cumulative schemes are not considered to have the potential to produce cumulative effects alongside the proposed development. Furthermore, many of the cumulative schemes also include residential units,

which themselves are sensitive receptors that could be subject to daylight and sunlight impacts as a result of the proposed development. Effects on these sensitive receptors should also be assessed or sufficient justification should be provided explaining why significant effects on these receptors are not expected to arise.

22.1.5 (e) [Wind Microclimate] This is not considered to be sufficiently robust and the quality of the images presented in Appendix 13.1 do not allow for a clear comparison. It is requested that clarification is provided as to the conditions measured and how they relate to the target conditions.

22.2 Summary of Regulation 25 Requests from Applicant

22.2.1 (f) The intra-project effects assessment is reported in this section. However, the assessment has not considered the effect interactions on each receptor individually and therefore, the results are of limited value. For example, rather than considering the effect interactions on individual residential receptors (e.g. West Hampstead Student Accommodation or Clockwork Factory Apartments), effect interactions have only been assessed in regard all "Existing residential uses in the surrounding area". As such, it is unclear what significance the effect interactions would be on the individual receptors, which is particularly important for receptors like West Hampstead Student Accommodation or Clockwork Factory Apartments that are expected to experience major negative effects from construction noise alone. This assessment should be updated so that each individual receptor considered in each technical chapter within the ES is considered individually, with all potential effect interactions identified on each receptor and an overall cumulative effect significance also provided for each receptor. Separate assessments for the construction and operational phase should be provided.

22.3 Response

22.3.1 (a) Construction noise is loud and intrusive. Therefore, it is expected to result in major negative effects on two receptors, and moderate negative effects on five receptors (all of which are significant).

22.3.2 However, because construction noise is loud, for cumulative effects to be meaningful in terms of level, the noise levels generated at sensitive receptors by nearby schemes must be comparably high. Therefore, the separation distances need to be comparable, assuming construction works activities are somewhat equivalent in terms of noise generation. There are no committed developments and receptors for which this is the case. Therefore, the significances of effects are not changed for any receptors when considered cumulatively. However, the time durations for which effects are experienced may be greater. An example is provided within the next response.

22.3.3 Elevated levels of vibration will be limited to specific activities such a piling. It is highly unlikely that other construction works carried out on site would result in meaningful levels of vibration at nearby sensitive receptors. If concurrent piling works were carried out on site and at another

committed development identified, this would not result in a notable perceived increases in vibration levels, as the separation distances of committed developments are too great. For context, significant effects are only expected for piling works being carried out approximately 10m from sensitive receptors.

22.3.4 (b) Whilst Scheme 5 is close to Receptor 2, it is over 100m away. Noise from construction works serving the Proposed development are assessed based on being only 13m away from Receptor 2. Therefore, there is a large difference in separation distances in relative terms. Consequently, any noisy works being carried out on site, would be far louder than the noise contributions from Scheme 5 at the closest windows, unless the works being carried out on site were on the quieter end of the spectrum. Therefore, the cumulative effects are far more related to lack of respite, or increased time exposure to elevated noise levels, than they are to increases in noise levels.

22.3.5 Nevertheless, it is worth noting that Scheme 5 and the proposed development are on opposite sides of Receptors 1 and 2. Therefore, the cumulative effects will differ for different occupants within the receptor locations.

22.3.6 There is a very high number of possible scenarios for cumulative construction noise levels to interact. However, a more comprehensive assessment would not result in noise levels higher than those summarised in the construction noise assessment, because very conservative assumptions have been made for assessment, particularly in terms of separation distances. The assessment carried out in the noise and vibration chapter of the ES shows the worst-case significances of effects expected to be experienced by nearby receptors. These effects are not altered when considered cumulatively. Durations of exposure to meaningful levels of construction noise may be increased by cumulative schemes, but at lower levels than those used for defining significances of effect.

22.3.7 For vibration, it is possible that Receptors 1 and 2 could have their exposures to minor effects increased in terms of time. Nevertheless, it should be noted that this period of minor effects is a small number of working days. Piling works carried out serving other schemes would be too far away from sensitive receptors to result in meaningful levels of vibration (particularly significant levels).

22.3.8 (c) LBC require building services plant noise to not exceed 10 dB below the lowest existing background sound levels at nearby sensitive receptors. Clearly, if this approach is adopted by committed developments, then the noise levels further away would be lower. This is an onerous criterion, which will result in low plant noise levels in absolute terms.

22.3.9 For example, the distance between the nearest cumulative scheme (2015/6455/P) likely to generate meaningful levels of environmental building services plant noise and the nearest residential receptor is approximately 10m. The distance between this scheme and the nearest assessment receptor for the Proposed Development (Receptor 2) is more than 85m away. Therefore, the levels of environmental building services plant noise would be at least 19 dB lower at Receptor 2. Therefore, the cumulative contributions of building services noise from

other committed developments on nearby noise sensitive receptors to the Proposed Development will be negligible, on the assumption that background sound levels close to nearby committed developments are not drastically lower than they are for receptors close to the Proposed Development.

22.3.10 Consequently, the cumulative effects of building services plant noise are not expected to be perceivably different to those expected for the Proposed Development in isolation.

22.3.11 (d) We do not agree that 156 West End Lane is 'extremely close' from a daylight, sunlight or overshadowing perspective. The closest point of 156 West End Lane to the closest point of the development (part of Block N7) is approximately 90m. The height difference from the ground level of 156 West End to the top of Block N7 is approximately 37.8m. This equates to an obstruction angle of under 23 degrees. The BRE guidelines state that if the development sits beneath an obstruction angle of 25 degrees them it is unlikely to have a material effect. As the obstruction will be below 25 degrees, we do not consider that detailed calculations need to be undertaken and can be scoped out.

22.3.12 (e) A number of committed developments were identified as being relevant. These were identified through a review of LBC's planning portal and have been agreed with LBC. Committed schemes which then fall within the extents of the computational wind model are identified in Table 22.3.1 and Figure 22.3.1.

Table 22.3.1 Relevant committed developments for cumulative configuration

SCHEME REFERENCE	ADDRESS	PLANNING REFERENCE
4	1-33 Liddell Road, London, NW6 2EW	2014/7649/P
5	156 West End Lane, London, NW6 1SD	2015/6455/P
6	317 Finchley Road, London, NW3 6EP	2016/2910/P
7	Land at Midland Crescent, Finchley Road, London, NW3 6NA	2014/5527/P

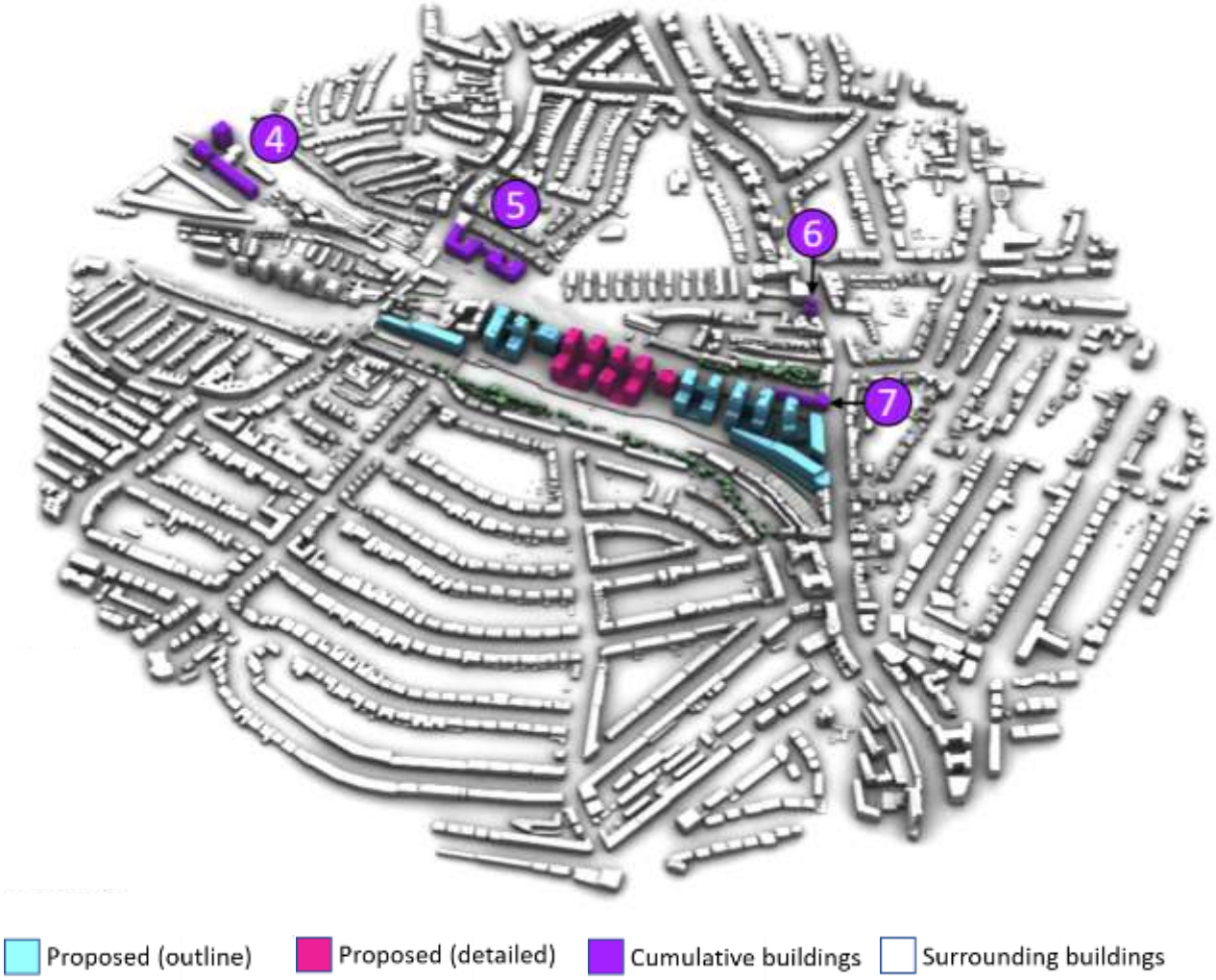


Figure 22.3.1 Cumulative configuration (proposed site and relevant cumulative schemes)

22.3.13 This section outlines the potential conditions of the Cumulative site configuration.

22.3.14 The Cumulative conditions have been studied considering the massing of the Proposed Development alongside other committed development schemes proximate to the Site, terrain profile and existing vegetation either within the surroundings or due to be retained within the development. Both Detailed and Outline design have been assessed in the same Cumulative scenario.

22.3.15 Cumulative conditions on an annual and seasonal basis were included within Appendix 13.1 of the 2022 ES. No significant changes from the proposed conditions have been identified and there are therefore no cumulative effects.

- **Ground/street level**

The results of the safety assessment conducted on the Cumulative scenario indicated that the wind conditions within the Site and its immediate surroundings are similar to those of the Proposed scenario. Overall, all the street-level areas in the Site and adjacent areas remain

within the safety criteria for all pedestrians throughout the year and therefore, no mitigation is required.

- **Elevated Levels**

The results of the safety assessment at elevated levels for the Cumulative scenario indicated that the wind conditions at the terraces of the Proposed Development remain unchanged from the Proposed scenario, still indicating multiple safety exceedances at the edges of the highest terraces in each block (see Appendix 13.1 - Winter Wind Conditions: Safety). However, as mentioned in the Proposed configuration, at the moment these areas do not incorporate any mitigation strategy and therefore, further mitigation studies would be required. Any proposed mitigation strategy will need to be tested by an experienced wind professional with the use of CFD or Wind Tunnel studies. Based on professional judgement, it is however expected that the introduction of appropriate mitigation strategies will resolve any safety issues on the terraces.

All remaining terraces accessible to occupants, will meet the safety criteria and mitigation would not be required. These terraces will be suitable for pedestrians for wind speeds not exceeding 15 m/s for 0.022% of the year.

22.3.16 (f) See updated Chapter 17: Cumulative Effects (Appendix 10).

23.0 Review of Chapter 18 Summary of Effects, Mitigation & Monitoring and Chapter 19: Summary of Residual Effects

23.1 Summary of Clarifications Required from Applicant

23.1.1 Table 19.1 sets out a summary of the residual effects of the proposed development. While it is useful that the various key descriptors are included (e.g. permanent/temporary), effects have not been reported on a full receptor by receptor basis. For example, the residual effects on each residential receptor considered in the daylight and sunlight assessment have not been reported individually. The table should be updated to provide this information

23.2 Summary of Regulation 25 Requests from Applicant

23.2.1 None.

23.3 Response

23.3.1 See updated Chapter 19: Residual Effects (Appendix 11). This has also been updated to reflect any changes to the residual effects in the previous sections of the RR (i.e. Archaeology, Wind, Ecology and Socio-economics). The same applies to the NTS (Appendix 7) which also reflects any changes.

END.

115 Southwark Bridge Road **|** London **|** SE1 0AX
+44 (0) 20 7490 7700
webenquiry@plowmancraven.co.uk

https://www.plowmancraven.co.uk/