

RPS

# Environmental Statement Review

In respect of

Canterbury House

On behalf of

Croydon Borough Council

RPS Ref: JCG23180

15<sup>th</sup> January 2018

*Secure & Stable*  
ADDING VALUE

## QUALITY MANAGEMENT

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Date:	15 <sup>th</sup> January 2018
Project Number/Document Reference:	JCG23180 – Version 3 (FINAL)

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# 1 INTRODUCTION

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- 1.1 RPS has been appointed by the London Borough of Croydon (LBC) to undertake a review of the Environmental Statement (ES) produced by AECOM Infrastructure and Environment Ltd (AECOM) on behalf the Applicant (Croydon Investments Ltd) for a proposed residential development at land bounded by Sydenham Road to the north, Mott McDonald House and Cygnet House to the east, Emerald House and Marco Polo House at 1 Lansdowne Road to the south, and Apollo House to the west.
- 1.2 The proposed development comprises a 34 storey (113m) building plus 2 basement levels, to provide residential accommodation (Class C3) comprising 296 flats (1 and 2 bed units), communal amenity space, cycle parking, landscaping and associated plant (hereafter referred to as 'the scheme').
- 1.3 The site contains a 12 storey former office building (Canterbury House) which has recently been converted to residential use, containing 96 flats (55 one-bed units and 43 two-bed units). This building will be retained and, apparently, remain fully occupied during the construction works. The development will however involve the demolition and relocation of the adjoining single storey energy centre building which will be relocated to the ground floor of Canterbury House (with the loss of 2 flats), together with the removal of the surface car park which occupies the remainder of the site.
- 1.4 The scheme has been determined to be 'EIA Development' and RPS has advised the LBC as to the appropriate approach and scope of the ES, which was reflected in the Council's Scoping Opinion of 14<sup>th</sup> June 2017. AECOM has since compiled the ES in conjunction with a team of technical consultants, and the Applicant has submitted this with a full planning application (17/04836/ FUL).
- 1.5 This document sets out the outcome of RPS' review of the ES for the scheme, in terms of its adequacy in meeting the requirements of the EIA Regulations 2011 (as amended), potential areas where Regulation 22 ('further information') may apply, and general comments regarding any variance with established EIA best practice (including IEMA guidance) plus other observations and matters of clarification.
- 1.6 As the request for a Scoping Opinion was submitted to LBC prior to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 being transposed, the ES needs only to comply with the 2011 EIA Regulations, in line with the transitional arrangements set down by Government. The ES has therefore been reviewed on the basis of these older Regulations.
- 1.7 Based on the outcome of the ES Review, RPS is currently minded to recommend to the Local Planning Authority that they make a request for 'further information' in accordance with Regulation 22 of the EIA Regulations. This further information would address the various omissions and apparent inconsistencies within ES, as set out in this report, and could take the form of an Addendum to the ES and/or replacement chapters. In agreement with LBC, the Applicant/ AECOM were given the opportunity to respond to these comments before this ES review report was finalised. However, at the time of writing (12.01.17) no response has been received.

- 1.8 LBC should also have regard to for comments of the statutory consultation bodies and other stakeholders on the ES and related documentation.
- 1.9 Any questions relating to the contents of this report should be directed to David Thomson ([thomsond@rpsgroup.com](mailto:thomsond@rpsgroup.com)) or Chris Ellis ([chris.ellis@rpsgroup.com](mailto:chris.ellis@rpsgroup.com)) – 020 7280 3250.

## 2 REVIEW OF THE ENVIRONMENTAL STATEMENT

2.1 This section gives an overview of the ES review process and provides comments on the Non-technical Summary (NTS) and each subsequent chapter of the ES. Where more general comments or apparent ‘errors’ have been identified, which are applicable to the whole ES, these are outlined within the first table below.

### Methodology

2.2 The ES Review focuses on whether the ES provides the commensurate level information and confidence over the ‘likely significant environmental effects’ of the proposed development, as judged against: Schedule 4 of the EIA Regulations, which sets out the statutory minimum information to be included within an ES; the Institute of Environmental Management & Assessment (IEMA) ES Review Criteria; and RPS’ knowledge and professional experience of managing, writing, reviewing and defending ESs at Public Inquiry.

2.3 The ES Review Report applies a colour coding Red-Amber-Green (‘R-A-G’) system to denote the significance of particular effects, omissions or errors in each ES Chapter. This system has been adopted to indicate the importance of the issue or query raised in respect of compliance with the EIA Regulations and established best practice.

2.4 Table 2.1 provides a key to explain what issues each colour denotes.

**Figure 2.1: Key to assessment**

<p>Items that are flagged <b>green</b> are points for the Council (and Applicant) to note. These include matters of consistency, minor errors and departures from EIA best practice, in respect of which no specific action is required; unless the Applicant wishes to clarify/ rectify these issues, or, the LPA consider that in aggregate these errors render a particular Chapter or section of the ES to be deficient and not fit for purpose.</p>	
<p>Items that are flagged <b>orange</b> are major issues but not ones that necessarily warrant a Regulation 22 request for further environmental information at the current time. However, written clarification should be sought from the Applicant on these matters. Depending on the response, these may then need to form part of a subsequent formal Regulation 22 submission.</p>	
<p>Items that are flagged <b>red</b> are considered to be the most significant issues which render the ES deficient and which contravene the requirements of the EIA Regulations and/ or related case law. The Council should therefore consider formally requesting ‘further information’ on these matters in accordance with Regulation 22 of the EIA Regulations. Such submissions can take the form of an addendum or supplement to the ES, or, by the replacement of individual Chapters. An updated version of Non-technical Summary (NTS) would also normally be provided at this time in order to highlight any corresponding changes to the ES and the individual impact assessments.</p>	

2.5 The following table provides an overview of RPS' observations and comments which are applicable to the whole ES. Specific details on what further information is required is also included for those issues deemed of enough importance that they could result in a request for further information (Regulation 22 Request):

## ES Volume 1

### General Comments and Errors

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required? (Reg. 22 Only)	Applicant/ AECOM response
Cover pages	Some chapters have cover pages and others do not. Although only cosmetic issue, this inconsistency is somewhat distracting.	Whole ES			
Scheme Details	As this is a full application rather than an outline planning application, it is surprising that some key design matters (e.g. the location of plant) appear to have been held over until the “detailed design stage”. This means that some of the impact assessment work relies on assumptions about how the scheme will be built out.	Whole ES		Written clarification required	
Non-mitigated adverse effects	Justification should be added where significant residual effects (‘moderate’ to ‘major adverse’) have been identified which do not appear capable of adequate mitigation (e.g. construction noise and vibration), or more details should be provided as to how such effects can be rendered acceptable through the imposition of planning conditions and/or other controls.	Whole ES		<ul style="list-style-type: none"> <li>Further information is required on how the Applicant proposes to mitigate these effects to non-significant levels?</li> </ul>	
Privacy Screen	The proposed Privacy Screen between the existing Canterbury House and the proposed building (as denoted on Figure 4-1) is a key and unusual feature of the design. However,	Whole ES		<ul style="list-style-type: none"> <li>If it is to form part of the scheme, the potential effects of the privacy screen must</li> </ul>	



	its related impacts (e.g. effects on views, daylight, sunlight, wind etc.) do not appear to have been assessed at all within the ES. This is a material omission of the ES.			<p>be provided throughout the ES.</p> <ul style="list-style-type: none"> <li>Please see relevant points on specific chapters for what further information is required.</li> </ul>	
Cycle parking	Inconsistent parking numbers are given between Chapter 4, the DAS, NTS (452 spaces), and Chapter 7 (Transport) and the Planning Statement (434 spaces). The actual number of spaces (basement and surface) should be clarified.	Chapter 4, Chapter 7, DAS, NTS		Written clarification required	
Current site usage/ vacancy	The NTS says the site is currently “unoccupied” and elsewhere the ES describes it as “vacant”. However, the existing Canterbury house, energy centre and car park all come within the planning application boundary (as shown on Figure 1.1). This is relevant to the consideration of the ‘no development’ alternative presented in the NTS and ES. Ideally, this should be rectified.	NTS and throughout the ES		Written clarification required	
Details of construction HGVs/ vehicle movements.	Chapter 7 states that it is anticipated that an average of 35 HGV movements per day will take place, whereas Chapter 9 states between 30-40 HGVs per day and Chapter 5, specifies 30-40 ‘vehicle movements’ which might imply <u>all</u> construction vehicles including HGVs and LDVs. These figures and the associated description should be consistent throughout the ES	Chapters 5, 7 and 9			

Appendices	It is unclear why the Transport Assessment has not been included as an Appendix to the ES, if it is being relied upon within the ES. Its inclusion with the ES would reduce the 'paper chase' and make the data more readily accessible to the reader.	Chapter 7			
Repetition	The introduction to each chapter of the ES is a bit formulaic and repetitive (e.g. explaining that the scheme will be referred to as the 'Proposed Development' and describing the 'Environmental Statement (ES)' each time).	Whole ES			
Summary/ Recommendation	More details should be provided on the Privacy Screen (e.g. its dimensions, materials and appearance) and its consequential environmental effects. Further mitigation measures should be identified and described to address all 'significant environmental effects'. Otherwise, LBC and the statutory bodies might expect to conclude that such effects are unacceptable.				

### Chapter 1: Introduction

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required? (Reg. 22 Only)	Applicant/ AECOM response
Status of planning application	<i>"It is the intention of the Applicant to submit a detailed planning application..."</i> – whereas the application has already been submitted?	Para 1.12			

Repetition	Has the Affordable Housing Statement been included with the Planning Statement or as a separate document?	Para 1.32 Bullet points			
Acronyms	A number of technical acronyms are used in this introductory chapter without citing these in full (e.g. CGIs).	Para 1.32 Bullet points			

## Chapter 2: EIA Methodology

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required? (Reg. 22 Only)	Applicant/ AECOM response
Transitional arrangements	It would have been helpful to the reader to explain the differences between the 'new' and 'old' EIA Regulations in more detail, albeit that the ES has (correctly) been prepared in accordance with the 2011 Regulations.	Paras 2.12-2.14			
Relocation of existing Canterbury House residents	It is understood that the Canterbury House is fully occupied and will remain so throughout the construction works, except for the two flats in the ground floor that will permanently be displaced by the energy centre. However, the noise and vibration chapter suggests that other residential floors may need to be vacated due to magnitude of impacts during the construction works creating unacceptable living conditions for existing residents. The applicant should therefore be asked to clarify this situation and explain what is meant by	Table 2.1		Written clarification required	

	<i>"The tenancies of the residents will be managed in house".</i>				
Clarity of language	Several paragraphs in this chapter are poorly worded and it is difficult to understand their meaning. Moreover, several acronyms are used without explanation (e.g. the meaning of 'DC&E?').	Para 2.35-2.36			
Neighbouring/ local residential properties	These should also be considered as sensitive receptors to demolition and construction effects (Chapter 5), wind (10) and daylight/ sunlight/ overshadowing (11) – i.e. not just the noise and air quality.	Table 2-2			
Public amenity space	It is considered that the 'public amenity space' should be specifically cited as a sensitive receptor to overshadowing.	Table 2-2			
Microclimatic impacts on sensitive receptors	Daylight/sunlight/overshadowing and wind are not mentioned in this table – which is presumed to be an oversight?	Table 2-2			
Construction Duration	This chapter says that construction effects have been assessed based upon a "24 month (approximately 2 years) programme of works" whereas elsewhere in the ES it states that this is 26 months. Such inconsistencies suggest a degree of uncertainty over the actual/ likely duration.	Para 2.45			
Occupation of the existing Canterbury House	Paragraph 2.48 states <i>"Whilst it is expected that the existing building will be unoccupied during the aforementioned demolition works, it is assumed that the existing residential building will be occupied whilst the main</i>	Para 2.48		<ul style="list-style-type: none"> <li>▪ The Applicant must confirm whether or not any of the existing residents of Canterbury House are proposed to be moved</li> </ul>	

	<p><i>construction works for the Proposed Development are underway</i>". This appears to be contradictory to other statements in the ES, as well as the Planning Statement. Can this please be clarified? Also, where would the residents be decanted to?</p>			<p>during the demolition phase?</p> <ul style="list-style-type: none"> <li>▪ If not, how will the amenity of the residents be protected (during each phase)?</li> <li>▪ If residents are to be moved, where will they be moved to?</li> <li>▪ Further information is required on these matters.</li> </ul>	
Long term (temporary) effects	<p>Can 'long term' effects also be considered 'temporary'? Consider revising.</p>	Para 2.57			
Relevance of example of difference between effect and impact/ incomplete sentence	<p>The end of paragraph appears to be incomplete: "<i>For example (not relevant to the planning application)</i>"</p> <p>Moreover, the quoted example below this sentence relates to a road bypass scheme and, indeed, this doesn't appear very relevant to the proposed residential development.</p> <p>It is assumed the above is simply an oversight and should have been corrected/ updated before the ES was finalised?</p>	Para 2.60			
1-5 Lansdowne Road	<p>It is understood that the planning application for the revised 1-5 Lansdowne Road scheme (17/03457/FUL) was approved before the ES was submitted. There appears to be some</p>	Para 2.91		Written clarification required	

	inconsistency/ confusion in the ES about which version of this development has been assessed as the most appropriate 'cumulative' scheme. Therefore, please can this be clarified for each respective topic?				
Summary/ Recommendation	The Applicant/ AECOM should be asked clarify the above issues and/or incorporate the necessary changes into a revised version of the ES (or ES Addendum).				

### Chapter 3: Alternatives and Design Evolution

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required? (Reg. 22 Only)	Applicant/ AECOM response
Location of site description text	The majority of information in this chapter, up to the heading 'Alternatives Analysis', constitutes a description of the site and its surroundings and therefore doesn't match the chapter heading. This information would be better placed in either the Chapter 1, or, the title changed to 'Site Description, Alternatives and Design Evolution'.	Up to 'alternatives analysis' heading			
Site description	The site is described as "under-utilised" in this section but later on (para 3.34) the term "vacant" is used. (also see comment above).	Para 3.4 'site intensification'			
Public access	Description stating that there is " <i>no public access into, through or around the site</i> ". Surely	Para 3.7			

	this is incorrect in light of the existing Canterbury House and open car park?				
Demolition and construction impacts	As identified later in the ES, significant impacts would also take place from vibration, in addition to noise and air quality.	Para 3.22			
Incomplete sentence	"... <i>leaving a vacant</i> " sentence is incomplete. Also, the site is not vacant.	Para 3.34			
Alternatives	No description is given of the 100% discount market rent (DMR) alternative that was envisaged previously and described in the scoping report. It should be explained why this 'alternative' has now been dismissed.	Alternatives section		Written clarification required	
Height of the proposed development	There is some confusion over the terminology "proposed height" and "current height". The building of 34 storeys proposed by the planning application, should be the "proposed height"?	Figure 3-3			
Preferred Option	The section titled Option 4 (Preferred Option) talks first about a 52 floor building and doesn't adequately explain how this progressed to the 34 storey planning scheme i.e. what influenced/ dictated this change, including environmental factors? Additionally, it is not clear what happened to the 36 storey option considered within the Scoping Report?	Para 3.50 to 3.52		Written clarification required	
Proximity to Emerald House	Why has the façade been designed to be 19m from Emerald House rather than the " <i>proposed minimum distance of 20m</i> "? Further reasoning for this is required. Additionally, the existing Canterbury House is only 9m away, yet this is not mentioned in the	Para 3.41		<ul style="list-style-type: none"> <li>▪ Further information is required to justify the building separations between the proposed development and Emerald House (19m) and with</li> </ul>	

	text – on what basis has this narrow separation between the buildings been justified, including its environmental effects?			Canterbury House (9m) and what are the effects on resident amenity, privacy and other environmental factors?.	
Error	“3.41 shows...” – should this say “Figure 3-4 shows...”?	Para 3.42			
Wind Microclimate Screen	Was the development tested with the privacy screen in the wind tunnel tests?	Para 3.61		This should matter should be confirmed.	
Summary/ Recommendation	The Applicant/ AECOM should be asked clarify the above issues and/or incorporate the necessary changes into a revised version of the ES (or ES Addendum).				

#### Chapter 4: The Proposed Development

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required? (Reg. 22 Only)	Applicant/ AECOM response
Repetition of text from previous section	Text is repeated from Chapter 3; see previous comment regarding site description text. Delete or move text.	Para 4.4-4.7			
Energy centre	This paragraph states that the energy centre “ <i>is located on the ground floor of the existing building</i> ”. As this appears to be referring to the existing energy centre, this is somewhat confusing.	Para 4.10			



Privacy Screen	<p>More information is required regarding the privacy screen due to its likely prominence within the scheme. The details included in the DAS with regards to transparency and design should also be included in the ES.</p> <p>What impact will it have on views, wind, and D/S/O? Also, will it be installed during the construction or operational phase, and what impact, if any, will it have on noise levels and visual amenity of the existing residents? Please also see comments within the relevant chapters.</p>	Para 4.10/ Figure 4-1 Also, throughout the ES.		<ul style="list-style-type: none"> <li>Further information is required on the design, materials, function, timing and discrete environmental effects of the privacy screen.</li> </ul>	
Energy centre	<p>How will the existing building be powered once it is disconnected from to the energy centre? Also, it is not clear what is meant by <i>“The energy centre will power only the Proposed Development and not the existing building”</i>?</p>	Para 4.16		Written clarification required	
Bike racks	<p>How many bike racks will be provided externally? There seems to be some inconsistencies in the numbers given for the basement and externally.</p>	Para 4.24		Written clarification required	
Flue stack	<p>Where is the flue stack located in relation to the brown roof and any accessible areas at roof level?</p>	Figure 4-12			
Energy centre	<p>Please provide details of the energy centre (or signpost to where this can be found), including stack height/location and emissions data.</p>	Para 4.50		Written clarification required	
Ventilation	<p>Is mechanical ventilation being provided as a result of poor air quality, noise, or both?</p>	Para 4.57			

Summary/ Recommendation	The Applicant/ AECOM should be asked clarify the above issues and/or incorporate the necessary changes into a revised version of the ES (or ES Addendum). In particular, further information is needed with regards to the privacy screen and the energy centre.				
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### Chapter 5: Demolition and Construction

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required? (Reg. 22 Only)	Applicant/ AECOM response
Incorrect paragraph numbering	The first two paragraphs are incorrectly numbered.	Paragraphs 1.1 and 1.2 (should be 5.1. and 5.2).			
Construction duration	Previous chapters have stated that construction will take 24 months, yet Table 5-1 (and other ES references) state 26 months (see previous comment).	Table 5-1			
Energy centre	Please confirm if the new energy centre will be in place before the existing is demolished. Also, how will safe access and service utility supplies to Canterbury House be maintained during the construction works?	Para 5.11 (and throughout the ES)		Written clarification required	
Transportation of pre-fabricated materials	This has not been assessed within the transport Chapter (7) of the ES. Has the reduction in HGV movements associated with off-site pre-fabrication been considered?	Para 5.29			

	Also, has any consideration been given for using an off-site consolidation centre for loads?				
Concrete Crusher	This table lists a 'concrete crusher' as one likely items of plant. Have noise and dust emissions from this plant been assessed in the ES, particularly with regards to the amenity of residents of Canterbury House?	Table 5-5		Written clarification required	
Waste management and use of materials from construction/ demolition	What will happen to materials that are removed from site? Details should be provided regarding the options for reuse or recycling offsite as specified in the NTS (e.g. through commitment to a Site Waste Management Plan/BRE Smart Waste or similar). Is quantity of waste meant to be in tonnes or m <sup>3</sup> ?	Para 5.33, 5.36 and Table 5.4			
Noise and Vibration	No specific details on mitigation measures to avoid adverse levels of vibration are provided within this section (i.e. it is all about noise).	Para 5.80-5.84			
Protection of water resources	Nothing specific is included about avoiding/ reducing the impact on groundwater. This is an omission in view of the potential for the proposed double basement to affect groundwater flows, and accounting for the groundwater source protection zone beneath the site.	Para 5.92-5.99		Written clarification required	
LBC Code of Construction Practice	No reference has been made to this LBC specific CoCP in this the chapter (although it is mentioned in other chapters).	Whole chapter			

Summary/ Recommendation	Although there are no material omissions in this chapter (i.e. potential Regulation 22 matters) it would have been better if the mitigation measures set out were entirely consistent with those in the technical chapters of the ES.				
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### Chapter 6: Socio-economics

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required (Reg. 22 Only)	Applicant/ AECOM response
Labour Market	As the proposed development is solely residential, it is not clear what is meant by “ <i>the labour market also incorporates the population that may reasonably be expected to travel to and benefit from the Proposed Development</i> ”? Who are these people and how would they benefit from the development?	6.31		Written clarification required	
Impact on residents from noise	What will be the socio-economic impact on people having to move out of the flats in Canterbury House, either temporarily or permanently, as a result of the development?	Para 8.109		Written clarification required	
Use of acronyms	Acronyms should be set out in full at first use (e.g. – Discount Market Rent, DMR).	Throughout the Chapter			
Assessment Criteria	Please explain why different criteria have been used from those specified in Chapter 2.	Para 6.38-6.40			

	Also, it is not clear what is meant by “ <i>and adverse effect on an effect area</i> ”.				
DMR as the worst case	Although it is stated that the Applicant has an “aspiration” to deliver the proposed development as a 100% DMR scheme, as this is not what has been applied for at this stage it would have been more appropriate for this chapter to have focussed on the socio-economic effects from 50% DMR and 50% private mix.	Para 6.45		Written clarification required	
Repetition	This section repeats, unnecessarily, the description of the site.	Para 6.48-6.50			
Incomplete assessment	An assessment of community and leisure facilities within the local area does not appear to have been undertaken (beyond the consideration of impacts on open spaces). As facilities such as local sports centres, playing fields, nurseries, religious and community centres etc. would be used by residents, a brief assessment of the capacity and proximity of these facilities to the site should be provided, accounting for the cumulative effects of the development in combination with other planned developments.  (Note: leisure facilities are detailed as sensitive receptors in Table 2-2 and so should be assessed.)	Baseline and assessment		Written clarification required	

Consistency of construction period	This section states the construction period is 24 months rather than 26 months as in Chapter 5.	Para 6.84			
Net construction employment	In these paragraphs it states a number of different figures for construction employment; however, none of these equate to the “207 net additional jobs” stated elsewhere, including in the Planning Statement.  This section says there will be an average of 145 construction workers per annum, 109 direct construction jobs and 185 net jobs (including indirect and induced employment).  Can a definitive figure please be confirmed?	Para 6.85-6.92 Planning statement, para 6.92, 6.125, Table 6-12,		Written clarification required	
Population yields	The population density of the proposed development seems slightly low, especially for the 2-bedroom units. More details of the methodology used to predict these numbers would have been helpful.	Table 6-14			
Displacement rate	Is it not likely that many more than 25% of future residents would already live in Greater London?	Para 6.97			
Local Spending	Do these estimations of local expenditure apply typical income levels for residents who would qualify for DMR housing (based on 100% DMR)?	Para 6.98-6.99, Table 6-15		Written clarification required	
Impacts of the DMR units	‘Moderate beneficial’ socio-economic effects seem slightly overstated for only 148 DMR	Para 6.107			

	units, when considered in an LBC and London wide context.				
Child yields and facilities	<p>The predicted child yield of 8 children (3 of school age) seems to be very low, even accounting for fact that the 2 bed flats will be smaller than typical and aimed at middle income families. Further justification of how these figures have been determined is required.</p> <p>There appears to be no assessment of the effects of pre-school age children on local nursery provision.</p> <p>Also, it seems odd that there are predicted to be more secondary pupils (2) than primary (1), given the small size of the apartments?</p>	Tables 6-17 and 6-18		Written clarification required	
GPs	<p>In light of the fact that the ratio of patients to local GPs is already above the recommended level at the 7 local GP practices identified within 1km of the site, the demand from the c.430 new residents on these health services might be expected to be more than 'minor adverse', especially without any specific commitment to CIL/s106 contributions.</p> <p>It is also unclear how the additional 19 patients per GP has been calculated and this should be clarified.</p>	Para 6.112		Written clarification required	

Cumulative effects	<p>It appears contradictory to argue on one hand there will be an enhanced ('major beneficial') cumulative effect on affordable housing provision, but no worsening of the 'minor adverse' effect on GP surgeries due to the demand from the cumulative schemes. Such a conclusion requires further justification.</p> <p>Similarly, the 'negligible' cumulative effect on local schools from the cumulative increase of approximately 4,500 new homes in the study area appears questionable, notwithstanding existing available capacity at these schools.</p>	Paras 6.138 and 6.139		Written clarification required	
Summary/ Recommendation	<p>More details are required on the potential for cumulative effects in the operational phase due to the increased demand to education and health care facilities.</p> <p>Further explanation on the forecast number of residents and the very low child yield is also required.</p>				

## Chapter 7 Traffic and Transport

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required (Reg. 22 Only)	Applicant/ AECOM response
Loss of car parking spaces	The chapter should quantify the loss of existing car parking spaces and the consequences of this. For example, are any	Whole Chapter			



	existing parking spaces allocated to the residents of Canterbury House or adjoining properties? Will these spaces be relocated elsewhere?	Para 1.6 (Ch 1)			
Consistency of construction details	Construction details in this section are not entirely consistent with Chapter 5. Has the transport assessment been based on the same construction programme and assumptions?	Para 7.31			
TfL Consultation	It is unusual that consultation has not taken place with TfL before the submission of the ES. Can clarification be provided as to why such consultation has not taken place?	Table 7-4		Written clarification required	
Missing description?	Although listed as one of the routes which will be impacted by the development (para 7.51), no description of Lansdowne Road is given in the text below. Is this omission accidental?	'Highway Network' section			
Cycle spaces	Chapter 4 states that 452 cycle spaces will be provided with 52 in the public realm, whereas para 7.85 states 434 with 34 spaces located within the public realm. Which figure is correct and does this comply with LBC and TfL/GLA policy?	Chapter 4, Chapter 7			
HGV Movements	This chapter anticipates an average of 35 HGV movements per day, whereas Chapter 5 suggests 30-40 'vehicle movements' rather than just HGV movements. This figure should be consistent throughout the ES and the maximum/ peak number of all	Chapter 5, Chapter 7, Para 7.94, 7.96		Written clarification required	

	construction vehicles (including LDVs) should be confirmed.				
Pedestrian Delay	It is noted that the 121% increase in traffic on Sydenham Road gives rise to a 'Moderate adverse effect'. This appears to be a reasonable conclusion but it is not clear how this effect can be mitigated.	Para 7.98			
Vehicle Trips	In the TA (para 7.1.6) it states that 'vehicles' include car, taxi and other goods vehicles (OGVs) trips. However, there are still additional figures for taxis and OGVs that are not carried across to the ES Chapter.	Table 7.9			
1-5 Lansdowne Road	Would this development not feed any construction traffic along Sydenham Road, which could create a more significant cumulative impact?	Para 7.133			
Summary/ Recommendation	This chapter appears generally adequate. However, it would be helpful if the authors could clarify the above queries.				

## Chapter 8: Noise and Vibration

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required (Reg. 22 Only)	Applicant/ AECOM response
Lack of certainty	Generally, this chapter reveals a high degree of uncertainty e.g. " <i>It is likely that there will be some variation between the predicted and actual construction noise levels</i> " and that the	Para 8.73 and elsewhere		<ul style="list-style-type: none"> <li>Further information is required on the potential noise levels and the magnitude of impact.</li> </ul>	

	<p>chapter only provides an <i>“indication of the magnitude of impact”</i>.</p> <p>As noise and vibration impacts are reported to be <i>“moderate to major adverse”</i> any worsening of these impacts could be deemed highly significant and unacceptable. There is also a lack of appreciation of the scheme design and construction programme (as described in chapters 4 and 5).</p> <p>The authors should confirm that the assessment of construction noise and vibration has been based on the construction details (including assumed plant) described in Chapter 5.</p>			<ul style="list-style-type: none"> <li>Confirmation required that the assessment of construction noise and vibration has been based on construction details described in Chapter 5 and uses ‘worst case’ assumptions.</li> </ul>	
Privacy Screen	<p>As no mention is made of the Privacy Screen, it is assumed that no assessment has been undertaken of its influence on both construction and operational noise levels to the residents of Canterbury House. This is a material omission in the ES and should be rectified.</p>	n/a		<ul style="list-style-type: none"> <li>As above, further information is required on the Privacy Screen and its effects on construction and operational noise levels.</li> </ul>	
Plant location	<p>Details of where plant will be located should be available for a detailed scheme, as well as what acoustic rating will be achieved with respect to BS8233.</p>	Para 8.63		Written clarification required	
Relationship between magnitude,	<p>The descriptions of the effects in Table 8-12 are confusing. For example, why does a <i>“moderate adverse magnitude”</i> lead to a <i>“just noticeable improvement”</i>?</p>	Table 8-12		Written clarification required	

perception and significance					
Proximity of existing Canterbury House	<p>The assessment should also consider the maximum noise and vibration levels at the closest distance to the facade of Canterbury House (i.e. 9m rather than 20m used in the assessment).</p> <p>It is unclear why have the maximum noise levels not been considered?</p>	Para 8.74-75		Written clarification required	
Commitment to mitigation	<p>The section titled Environmental Design and Management provides a number of mitigation measures which are said to have been "<i>Incorporated into the Proposed Development</i>" (Para 8.90). However, the list of mitigation measures at Para 8.93 are merely recommended measures that the Contractor "<i>should</i>" adopt, "<i>where practicable</i>".</p> <p>The Applicant should confirm that these are committed mitigation measures; especially if the following impact assessments rely upon them.</p>	Para 8.93		Written clarification required	
Construction noise generated by the proposed development	<p>The noise and vibration effects of moving the UKPN substation into the ground floor of Canterbury House should be more carefully considered. In addition, the statement ending "<i>...if required the affected properties will remain vacant during these works</i>" needs to be clarified.</p>	Para 8.109		Written clarification required	

Construction vibration	The statement " <i>...it is not anticipated that vibration is a concern and therefore does not require any more consideration in this environmental statement</i> " appears erroneous, because vibration is considered later in the chapter.	Para 8.88		Written clarification required	
Construction and design	These paragraphs show a lack of appreciation/ consideration of the details regarding construction and design contained in Chapter 5.	Para 8.114, 8.121			
Vibration impacts on surrounding properties.	<p>Use of piling equipment 9m away from the existing Canterbury House needs greater consideration and further details on how "<i>major adverse, short duration</i>" impacts from vibration will be mitigated in order to conclude that such impacts can be avoided or reduced to an acceptable level. The conclusion to this section is left somewhat up in the air i.e. "<i>Unmitigated, the moderate to major adverse effect would be significant at Canterbury House, the YMCA and Emerald House due to the sensitivity of the existing residents.</i>"</p> <p>The Applicant must explain what, if any, mitigation measures are available to reduce these vibration impacts to an acceptable/ insignificant level. Very little detail is provided in the Additional Mitigation section (para 8.131) beyond saying that an alternative form of piling (i.e. augered piling techniques)</p>	Para 8.115		<ul style="list-style-type: none"> <li>▪ Further information is required on the means by which construction vibration will be mitigated, considering the close proximity of Canterbury House</li> <li>▪ Justification required on why maximum noise levels have not been considered.</li> <li>▪ Clarification on what form of piling has been assessed.</li> </ul>	

	could be implemented. However, as this is already proposed in Chapter 5, it is unclear what form of piling has been used in the vibration calculations.				
Significant adverse effects on Canterbury House in the construction phase	Both noise and vibration could still result in significant adverse effects even after mitigation. In this regard, the Residual Effects and Conclusions (para 8.133) section appears misleading; how can it be concluded that <i>“it is not considered that there would be residual effects associated with the Proposed Development”</i> ? when there are still “moderate” and “major” effects after mitigation? This is also contradicted by what is said at para 8.134.  Further mitigation measures are clearly required to reduce both noise and vibration effects on Canterbury House.	Paras 8.130, 8.133 and 8.134		<ul style="list-style-type: none"> <li>▪ As above, further information is required on how these moderate to major construction noise effects can be further mitigated/ avoided.</li> </ul>	
Cumulative effects	It is noted that the “moderate” construction noise and vibration impacts on Emerald House could be worsened to “major adverse” if the development of 1-5 Lansdowne occurs concurrently. It is therefore vital that the “careful planning” and liaison with the contractors for these adjoining construction works is enforced (by joint Section 61 or similar agreements).	Para 8.140	Note to LBC		
Noise impact on ground level units	The potential noise impacts from the servicing, loading bay and bin storage	Operational effects			

	designs should be considered on the ground level units.				
Summary/ Recommendation	The Applicant/ AECOM should be asked clarify the above issues and/or incorporate the necessary changes into a revised version of the ES (or ES Addendum). In particular, further information is needed with regards to mitigation of all significant construction noise and vibration effects identified.				

### Chapter 9: Air Quality

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required (Reg. 22 Only)	Applicant/ AECOM response
Sensitivity of receptors (hotels) – inconsistency	Previously in the chapter (para 9.52) it is stated that hotels are not considered to be sensitive receptors, yet in paragraph 9.78 and Table 9-6 “hotels” are listed as sensitive receptors. Can this discrepancy be clarified?	Para 9.78 Table 9-6			
Typo?	“ <i>Current concentration of NO<sub>2</sub> is predicted to be 4.14µg/m<sup>3</sup></i> ”. This figure appears to be incorrect as it is not included within either of the tables. Should it be 34.14µg/m <sup>3</sup> ?	Para 9.81			
IAQM guidance/ Details of the CEMP	In contrast to the list of noise mitigation measures in Chapter 8, it is noted that all 50 mitigation measures (recommended by IAQM for ‘medium risk’ sites) “ <i>will be implemented</i> ”. Whilst this level of commitment is welcome, it is not really	Para 9.88			

	<p>necessary to list all of these measures verbatim. Instead, some screening should have been applied to identify the most relevant and to vary any measures that would not be necessary or appropriate to this particular site and development. For example, would the need to excavate the whole basement really allow for “<i>Only remove the cover in small areas during the works and not all at once</i>”?</p> <p>It is agreed that these measures will need to be implemented as part of a CEMP (Note: referred to as an “EMP” in Chapter 5) which should be subject of a planning condition.</p>				
Error	<p>‘%’ symbols are not correct in the ‘with development’ column as these are concentrations in <i>ug/m<sup>3</sup></i>.</p>	Table 9-10			
Stack height – potential impact to human health	<p>With the stack height set at 1m above the proposed roof height, will this impact on the proposed, taller 1-5 Lansdowne Road tower (i.e. if residents have balconies, operable windows or fresh air vents)?</p> <p>The Applicant should confirm why such effects have been scoped out of any assessment.</p>	Para 9.121		Written clarification required	
CHP	<p>The emissions from the CHP appear to have been calculated based on an assumed Kwh power output and specification for this plant (as described in para 9.20). However, these</p>	Para 9.121			



	details do not appear to have been described elsewhere in the ES or planning application?				
Collaborated approach with Lansdowne	This needs to take place in order to reduce construction impacts.	Para 9.139			
Odour	Odour impacts from the servicing, loading bay and bin storage designs should be considered on ground level units.	General			
Summary/ Recommendation	This chapter appears generally adequate. However, it would be helpful if the authors could clarify the above queries.				

#### Chapter 10: Wind

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required (Reg. 22 Only)	Applicant/ AECOM response
Privacy Screen	Has an assessment been completed on the impact of the screen that is proposed alongside the existing building? This may have the potential to create wind funnel effects.	No references to the privacy screen		<ul style="list-style-type: none"> <li>Further information is required on the influence of the Privacy Screen on wind patterns and flows.</li> </ul>	
Cumulative effects with 1-5 Lansdowne Road	It is noted that the cumulative wind implications of 1-5 Lansdowne Road scheme was based on modelling the (taller) 2016 scheme which was subsequently withdrawn, rather than the approved 2017 scheme. Whilst it can be taken at 'face value' that the differences in wind effects between these two schemes would be " <i>imperceptible</i> ", the	Para 10.58		Written clarification required	

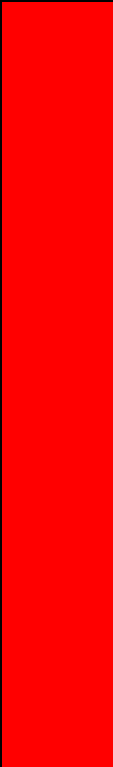
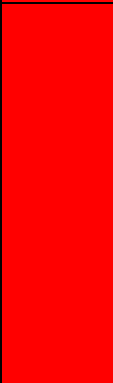
	Applicant should be asked to further explain why the approved scheme was not used in the wind tunnel test (e.g. due to lack of time?)				
Play Area	Paragraph 10.97 concludes that the wind conditions in the southern play area will only be suitable for standing in the summer season. As this play area includes seating, the effect is concluded to be “ <i>minor adverse</i> ” which is obvious less than ideal. Later in the ES (para 10.109) it says that seating will be restricted to the northern part of the play area where conditions will be suitable for sitting. However, for such a relatively small area, it seems surprising that wind conditions will be acceptable at one side but not at the other?	Paras 10.97 and 10.109			
Reference to Appendix is incorrect	Paragraph 10.108 should refer to ‘Appendix Appendix C’ rather than D. In this Appendix a clearer landscaping plan is required as the labels are illegible. Additionally, within either the ES or Appendix it does provide full details of proposed landscaping (e.g. tree species and dimensions) and/or how exactly this will reduce strong winds. More information is required on this landscaping; either now or part of an appropriate planning condition.	Para 10.108			
Summary/ Recommendation	This ES chapter and the associated assessment behind it, appear to generally acceptable. However, the impact of the privacy screen needs to be assessed because such a structure could lead to				

	localised wind funnelling. Also, the landscape design measures to ameliorate stronger wind speeds could be better explained.				
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### Chapter 11: Daylight, Sunlight and Overshadowing

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required (Reg. 22 Only)	Applicant/ AECOM response
Error	Paragraph 11.5 refer to <i>“the potential for combined <u>air quality effects</u>”</i> . This is assumed to be an error, and should say daylight, sunlight and overshadowing effects?	Para 11.5			
Privacy Screen	Has an assessment been completed on the impact of the privacy screen on the existing Canterbury House building? This screen might be expected to further worsen the daylight and sunlight conditions for the existing residents.	No references to the privacy screen		<ul style="list-style-type: none"> <li>Further information is required on the effects of the Privacy Screen on daylight, sunlight and overshadowing?</li> </ul>	
Frosted Glass	It is noted that the DAS submitted with the planning applications shows that some windows of the proposed building will contain “frosted glass” (presumably for the purposes of privacy?). However, so reference to this is made in the ES or the Internal Daylight and Sunlight Report (see also separate comments on this report below).	Included in DAS		<ul style="list-style-type: none"> <li>Why is this design feature (frosted glass) not mentioned in the ES or in the Internal Daylight and Sunlight Report.</li> <li>Clarification should be provided as to whether this form of glazing has been assessed and/or whether it</li> </ul>	

	<p>Has the potential impact of frosted glass on sunlight and daylight been determined? Although this glass should not significantly inhibit light transmittance, AECOM (or the authors DB7) should confirm that this glazing has been assessed.</p>			would adversely affect daylight or sunlight penetration to habitable rooms?	
Methodology	<p>It is explained that the internal daylight conditions of the Proposed Development are not presented in the ES Chapter – rather they are contained in a separate “Internal Daylight Report” submitted with the planning application. The reasons for this are not clear as ES’s usually include the results of this ‘self test’ analysis and the effects (of any poor natural light conditions) on future residents is a legitimate concern of the EIA process. This exclusion should be further justified and, at least, a summary of the results contained in the ES.</p> <p>It is also noted that the internal daylight and sunlight analysis was completed by a different company (DB7) to the authors of the ES chapter (Hawkins Environmental). It is unclear why separate companies were used for these, closely inter-related assessments, as this could lead to disparate methodologies being applied to the modelling.</p>	11.35		<ul style="list-style-type: none"> <li>▪ Reasoning is required to justify why the results of the internal daylight assessment are not presented within the ES.</li> <li>▪ Any revision to this chapter should at least include a summary of these results.</li> <li>▪ Why were separate consultants used for the analyses?</li> </ul>	
Major adverse effect on existing	A “major adverse” effect on Canterbury House for daylight and sunlight is noted;	Paras 11.95 to 11.57 and		<ul style="list-style-type: none"> <li>▪ Further information is required to justify why such</li> </ul>	

<p>Canterbury House</p>	<p>whereby 100% of windows (132 windows/ 94 rooms in 42 dwellings) on the southern facade of the building are predicted to experience a significant worsening of natural light – all will drop below the BRE guidance values for daylight and some flats, mostly those on the lower floors, will have zero direct daylight. In addition, 30 of the 42 flats would experience a reduction of more than 0.8 of existing sunlight levels and &lt;25% of APSH and &lt;5% during the winter months. This is likely to significantly affect the internal amenity for tenants of these properties, especially given the small apartment sizes.</p> <p>The Applicant must explain why such major adverse effects are considered to be acceptable, and whether all reasonable mitigation methods/ design iterations been considered to reduce this effect?</p>	<p>Table 11-7</p>		<p>a significant reduction in natural light at Canterbury House is deemed acceptable (with reference to other case precedents, if appropriate), and whether or not all possible mitigation measures/ design iterations have been considered.</p>	
<p>Moderate to Major adverse effect on existing Emerald House</p>	<p>The impact of the proposed development on Emerald House is slightly less than for Canterbury House – 6 properties experiencing a moderate and 2 a major adverse effect. However, these impacts appear to be significantly worsened once the committed 1-5 Lansdowne Road scheme is taken into account, with the cumulative impact being “large” due to all windows assessed receiving &lt;27% VSC and &lt;0.8</p>	<p>Paras 11.90 to 11.94, and 11.116</p>		<ul style="list-style-type: none"> <li>Further information is required Clarification of why such a cumulative reduction in natural light has been deemed acceptable, and whether all possible mitigation measures/ design iterations have been considered.</li> </ul>	

	<p>times the existing level of daylight (a reduction of between 50% and 75%).</p> <p>Again, the Applicant must explain why such adverse effects are considered to be acceptable, and whether all reasonable mitigation methods/ design iterations been considered to reduce this effect?</p>				
Cumulative impact on existing Canterbury House	<p>It is noted that the combined effects of the proposed development and Lansdowne Road scheme are worse than the (already major adverse) effect of the development in isolation. However, this additional impact is not quantified in the ES chapter. The reason for this should be explained.</p>	Para 11.119		Written clarification required	
Impact on proposed amenity space	<p>The authors conclude that the proposed amenity areas including the play space “<i>will not be well sunlit</i>” when judged against the BRE overshadowing criteria. Indeed, in combination with the overshadowing effect the 1-5 Lansdowne Road scheme, the play spaces and seating areas to the southwest and south of the site will receive “<i>virtually no direct sunlight on the 31<sup>st</sup> March</i>”.</p> <p>Combined with the risk of some (albeit occasional) windy conditions in these amenity areas, there must be a question about whether they are suitable for their intended use.</p>	Para 11.121		Written clarification required	

Winter Sunlight	Only a summary of winter sunlight results for the existing Canterbury House is provided in the ES. A detailed breakdown should be included in the appendices.	Para 11.76, 11.77, 11.99, 11.100 and appendices			
NSL	The detailed NSL results should also be provided within the appendices.				
Summary/ Recommendation	The Applicant/ AECOM should be asked clarify the above issues and/or incorporate the necessary changes into a revised version of the ES (or ES Addendum). In particular, further information is needed with regards to options to mitigate the significant Daylight and Sunlight effects of the proposed development on Canterbury House and, cumulatively, on Emerald House.				

The internal daylight assessment (completed by eb7) has subsequently been reviewed and comments are provided at the end of this section.

## Chapter 12: Ground Conditions

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required (Reg. 22 Only)	Applicant/ AECOM response
Piling risk assessment	Has a piling risk assessment been undertaken?	n/a		Written clarification required	
UXO	Why has an UXO desk study not yet been undertaken?	Table 12-12		Written clarification required	
Fuel Tank	It is noted that the archaeology chapter makes reference to a large underground fuel tank previously existing within the confines of energy centre (see para 14.102). As this would represent a potential source of hydrocarbon contamination, it should have been identified and assessed in this chapter as well.	No mention made of this former fuel tank		Written clarification required	
Further works	A Phase 2 site investigation should be completed prior to commencement of the development (subject to a planning condition). Should this encounter contamination, a further risk assessment and remediation strategy should be developed, particularly to ensure that the underlying aquifer is protected from pollution during the installation of the secant piled wall for the basement.	Table 12-12			
Remediation as a mitigation measure	Would the removal and remediation of contaminated land not be included as a mitigation method during construction?	Table 12-13			
Summary/ Recommendation	This chapter is considered to be broadly adequate. However, 3 clarifications are required, as set out above.				



**Chapter 13: Water Resources, Drainage and Flood Risk**

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required (Reg. 22 Only)	Applicant/ AECOM response
Repetition of information	It is unnecessary to repeat all of this information again; it has already been provided a number of times within the ES and does not add further value.	Para 13.87-13.90			
Repetition with Chapter 12	Parts of this chapter appear to have been written in isolation from the preceding chapter. For example, why is it necessary to provide a separate assessment on the risk of disturbing contaminated land?	Par 13.176 – 13.180			
Repetition of paragraph	Is this paragraph meant to be here, as it is the same as para 13.196?	Para 13.208			
Mitigation measures	A planning condition should be imposed to secure the mitigation measures detailed in this section.	Para 13.242	LBC to Note		
Mitigation measures	Where additional mitigation is required, brief details of this should be included in the table, as with other chapters.	Table 13-11			
Summary/ Recommendation	This chapter appears generally adequate and no material omissions have been noted.				

**Chapter 14: Archaeology**

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required (Reg. 22 Only)	Applicant/ AECOM response
Archaeological Baseline	Paragraph 14.72 appears to be a bit misleading in that it states: <i>“There are four non-designated archaeological assets within the site including three post-medieval houses ...as well as two small buildings etc.”</i> rather than making it clear that there is only the potential for buried remnants of these structures to survive.	Para 14.72			
Mitigation measures	The chapter recommends a number of potential mitigation options, as set out in Table 14-5, comprising a <i>“staged programme of archaeological investigation”</i> . However, it is unclear when such investigations would take place and/or whether this work could be accommodated within the 2 year (26 month) construction programme – which appears unlikely.				
Summary/ Recommendation	This chapter appears generally adequate and no material omissions have been noted.				

## Chapter 15: Effect Interactions

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required (Reg. 22 Only)	Applicant/ AECOM response
General	This chapter provides an unduly complex and convoluted explanation of 'effect interactions' which could have been simplified for the reader.	Whole chapter		Written clarification required	
Clarity of sentence	The first and last sentences of this paragraph are unclear and/or incomplete.	Para 15.4			
Clarity of sentence	The second sentence within this paragraph does not make sense "... <i>determine the potential for effect interactions and so combined effects of individual effects</i> ".	Para 15.11			
Inconsistency	This chapter, in common with some other technical chapters of the ES, refers to the implementation of a CEMP. However, this contrasts with the terminology used in the introductory chapters of the ES which refer to an 'EMP'. Whilst not a material point, this illustrates a general inconsistency by the ES authors.	Whole ES			
Significant effects	The chapter identifies that the combination of construction noise and vibration would constitute a major adverse combined nuisance effect. It then goes on to say that such effects are " <i>not untypical for a project of this nature and scale</i> ".	Para 15.20 and 15.23		Written clarification required	

	This statement is somewhat misleading as major adverse effects of the scale predicted (especially to the residents of Canterbury House) are <u>not</u> typical of construction projects and would not normally be permitted by the LPA.				
Summary/ Recommendation	The Applicant/ AECOM should be asked clarify the above issues and/or incorporate the necessary changes into a revised version of the ES (or ES Addendum).				

#### Chapter 16: Residual Effects and Conclusions

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required (Reg. 22 Only)	Applicant/ AECOM response
General	In common with other aspects of the ES, this chapter is rather formulaic. For example, it refers several times to “demolition, construction and refurbishment works” although the proposed development, as described in Chapter 5, does not entail any “refurbishment” as such.	Para 16.1 and 16.6.			
Factors which influenced the design	Para 16.4 suggest that a number of measures have been implemented within the scheme design to “ <i>eliminate</i> ” adverse environmental and social effects including initial wind microclimate assessments and that a number of scheme variations have been considered	Para 16.4		Written clarification required	

	including “ <i>configurations of the basement</i> ”. If this was the case, a more complete account of these design iterations should have been included in Chapter 3: Alternatives and Design Evolution (which says nothing about the basement design?).				
Use of shading	The tables in this chapter use a green shading to signify any ‘significant environmental effect’, both beneficial and adverse. It might have been clearer if different colours had been used i.e. green for beneficial and red for adverse.	Para 16.6 and 16.7, and Table 16-1 and 16-2			
Inclusion of mitigation measures	It would have been helpful to the reader if the proposed mitigation measures were also detailed within these tables.	Tables 16-1 and 16-2			
Balance of topics	The chapter gives a fairly detailed account of the residual effects on Townscape, Views and Heritage but only briefly describes the other topics/ effects. Therefore, read in isolation, this chapter provides a rather skewed account of the residual environmental effects of the scheme.	Paras 16.9 to 16.18.			
Balance of effects?	The chapter suggests that the beneficial socio-economic effects of the scheme include inter alia “ <i>sport and leisure</i> ”. However, this is not a benefit identified in Chapter 6 and does not appear relevant. This should be clarified.  Also, the benefit of the play space provision might be considered to be ‘overplayed’ in light			Written clarification required	

	of the apparent poor microclimatic conditions in these spaces (see previous comments).				
Lansdowne Road scheme	<p>The 1-5 Lansdowne Road (17/03457/FUL) cumulative scheme was granted planning permission by the time the ES was submitted and therefore should have been assessed in the TVIA.</p> <p>Moreover, as this scheme must be assumed to be 'committed development' it should be accounted for in all assessments. For example, whereas paragraph 16.32 says that the daylight reduction to Emerald House will be "moderate adverse", this would actually be "major adverse" after accounting for the presence of this adjoining development once built out.</p>	<p>Para 16.16</p> <p>Para 16.32</p>		Written clarification required	
Conclusion	In consideration of the significant adverse effects of the proposed development (some of which appear incapable of mitigation) it is questionable to argue that there are " <i>overriding beneficial effects of delivering the Proposed Development</i> ".	Para 16.34		Written clarification required	
Privacy Screen	Again, the absence of any reference to the proposed Privacy Screen in this chapter must be considered a major omission and undermines the conclusions on the residual effects of the proposed development.	Whole chapter		<ul style="list-style-type: none"> <li>▪ As above, the potential effects of the Privacy Screen should be considered throughout the ES, and conclusions of any residual effects determined should be included within this chapter.</li> </ul>	

Summary/ Recommendation	The Applicant/ AECOM should be asked clarify the above issues and/or incorporate the necessary changes into a revised version of the ES (or ES Addendum).				
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## Volume II: Townscape, Visual and Built Heritage Impact Assessment

Having reviewed the TVBHIA, RPS considers that relevant views of the proposed development have been considered and the impacts on townscape, visual and built heritage have been assessed thoroughly, including for the cumulative developments that are expected to come forward within the surrounding area. However, the one obvious omission is that the visual effects of the Privacy Screen have not been assessed. Moreover, we are aware that Historic England has identified a further view (from the proposed St Michael's Square development) which they believe needs to be assessed.

A table summarising any issues noted is provided below.

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required (Reg. 22 Only)	Applicant/ AECOM response
Summary of findings	It would have been helpful for the beneficial and adverse effects on the receptors to have been summarised in a table at the end of the document as part of the conclusion.	Conclusion section			
Comment from Historic England	In consideration of the representation by Historic England, a further view should be prepared to illustrate the cumulative effect of the proposed development with the recently consented St Michael's Square scheme, in order to assess the impact on the Grade 1 St Michael and All Angels church.	Viewpoint analysis		<ul style="list-style-type: none"> <li>Inclusion of additional viewpoint and impact assessment on St Michael and All Angels church, accounting for the cumulative effects with the proposed St Michael's Square development.</li> </ul>	

Privacy Screen	<p>Insufficient details have been provided (beyond a very brief reference at paragraph 6.7) on the impacts of the proposed Privacy Screen on townscape and views.</p> <p>Note: As this feature was not revealed by the Applicant at the scoping stage, understandably no comment was made about this in LBC's Scoping Opinion.</p>	Throughout		<ul style="list-style-type: none"> <li>Further assessment required of the impacts of Privacy Screen on townscape, including updating all relevant views in which it would be visible.</li> </ul>	
Verified views	The Council's heritage advisor has raised concerns about the accuracy of the verified views included within the report, in particular with regard to the scale of the cumulative developments relative to the proposed development.			<ul style="list-style-type: none"> <li>Accuracy of the verified views needs to be confirmed.</li> </ul>	

## Non-Technical Summary

A number of issues have been noted in the NTS. However, other than where details have been misrepresented or not given in enough detail, most of the issues will be rectified by the changes made to the ES that would subsequently need to be updated in the NTS.

Issue	Description	Relevant paragraph/ table	RAG rating	What further information is required (Reg. 22 Only)	Applicant/ AECOM response
Error	"negligible and moderate" should read "negligible and minor".	Para 14			
Incorrect information – states building is unoccupied	The NTS says the site is currently unoccupied and the ES says site is vacant. The existing Canterbury house is included in the site boundary and there is also an energy	Para 38		Written clarification required	



	centre on site. The NTS 'no development' section needs to be updated to reflect this.				
Privacy screen	Whilst the privacy screen is mentioned at paragraph 53, no assessment of its effects is provided (as for the ES).	Para 53		<ul style="list-style-type: none"> <li>An assessment of the effect of the privacy screen should be provided for all the relevant chapters raised previously. These findings should be included in the NTS.</li> </ul>	
Cycle parking	Different figures between Chapter 4, the DAS and NTS (including the transport section) (452 spaces), and Chapter 7 (transport) and the Planning Statement (434 spaces).	Table 2, para 57		Written clarification required	
Waste	How will waste be 're-used where possible'?	Para 70			
Job creation	Paragraph 73 states that 185 jobs will be created in the construction phase, whereas the Planning Statement says 207 jobs. Which figure is correct?	Para 73		Written clarification required	
School places	What about pre-school/ nursery provision?  Also, wouldn't the proposed development be more likely to have more primary school children than secondary school age?	Para 77		Written clarification required	
Privacy screen	What is the effect of the privacy screen on wind and D/S/O conditions?	Para 114-118; 122-128		<ul style="list-style-type: none"> <li>An assessment of the effect of the privacy screen should be provided in the D/S/O assessment (as well as noise, wind, TVBHIA and other chapters) and these</li> </ul>	

				findings should be summarised in the NTS.	
GP demand	As per the previous comment on Chapter 6, the cumulative impacts on GPs would be expected to be higher than minor adverse. Please explain how this was concluded.			Written clarification required	
Overshadowing of amenity space	It should also be acknowledged that less than 50% of the amenity space would get 2 hours of sunlight because of the Lansdowne Road scheme.	Para 190			
Summary/ Recommendation	The NTS will need to be revised to reflect any ES revision/ further information provided by the Applicant. At this juncture, it would be advisable to also address the above issues and for the NTS to provide a more complete account of the full findings of the ES (as the current version is too vague in places).				

## ES VOLUME III

### Appendix A – Scoping Report and Scoping Opinion

No additional comments.

### Appendix B – Noise and Vibration

No additional comments.

### Appendix C – Air Quality

No additional comments.

#### **Appendix D – Wind Microclimate**

Appendix D: Appendix C – a clearer Landscaping Plan would have been beneficial as the labels are illegible. Additionally, neither the ES nor this Appendix fully explains what the proposed landscaping scheme comprises and how it has been informed by the wind microclimate modelling. More information is requested on this.

#### **Appendix E – Daylight, Sunlight and Overshadowing and Solar Glare**

No additional comments.

#### **Appendix F – Ground Conditions**

No additional comments.

#### **Appendix G – Water Resources, Drainage and Flood Risk**

No additional comments.

#### **Appendix H – Archaeological Desk Based Assessment**

No additional comments.

### **Planning Statement**

RPS has reviewed the Planning Statement but we provide no opinion on its validity because this is beyond the scope of our commission. Instead, the comments given below relate to lack of consistency with the ES and other apparent errors in this document.

<b>Issue</b>	<b>Description</b>	<b>Relevant paragraph/ table</b>	<b>RAG rating</b>	<b>What further information is required (Reg. 22 Only)</b>	<b>Applicant/ AECOM response</b>
Incorrect AOD	An erroneous figure is given for the mAOD	Para 4.4			

Construction Noise	The “moderate to major adverse effect” from construction noise is not acknowledged in the Planning Statement	Para 7.118-7.120		<ul style="list-style-type: none"> <li>This moderate to major adverse noise effect should have been acknowledged.</li> </ul>	
Underplayed impact on daylight, sunlight and overshadowing	The “major adverse” effect on the daylight and sunlight conditions at Canterbury House is understated in the Planning Statement.	Para 7.128-7.140		<ul style="list-style-type: none"> <li>The major adverse effect on D/S/O at the existing Canterbury House should have been be detailed in full in the Planning Statement, so that this matter is not misrepresented.</li> </ul>	

## Sustainability Statement

No comments.

## Eb7 Daylight and Sunlight Report

Issue	Description	Relevant paragraph/table	RAG rating	What further information is required (Reg. 22 Only)	Applicant/ AECOM response
Analysis of Kitchens	It is noted that the Average Daylight Factor (ADF) has not been calculated or reported for individual kitchens within the proposed development. Instead, were there are combined living/kitchen/dining rooms (with the kitchens located at the rear of the apartment), the living rooms have been assessed ‘ <i>in isolation</i> ’ and the kitchens have been excluded.	Para 2.4		<ul style="list-style-type: none"> <li>Clarification of whether kitchens have been assessed. If not, the Living/Kitchen/Dining rooms should be assessed as a single room against the most applicable BRE target values and not split into parts.</li> </ul>	

	This approach to the assessment may mask, potentially high levels of failure of the BRE 2% ADF target value for kitchens within the proposed development.				
Winter APSH results	Limited commentary is provided on the Winter APSH results. It is not explained why such results have not been more clearly set out?	Para 6.10		Written clarification required	
Cumulative Schemes	Only a very limited number of cumulative schemes have been considered in the analysis (i.e. the Whitgift Centre) whereas closer developments such as 1-5 Lansdowne Road are likely to have a much more pronounced effect on internal sunlight and daylight conditions (as evidenced by the DSO results reported in the ES). This appears to be a material omission in the assessment and it is inconsistent with the ES.	Para 6.12		<ul style="list-style-type: none"> <li>▪ Need to update internal daylight and sunlight assessment to account for all relevant cumulative schemes identified in the ES.</li> </ul>	
Detailed Results	Each window has been split into 'L' and 'U'. It is not clear why or what this relates to,	Appendix 2		Written clarification required	

### 3 SUMMARY AND CONCLUSIONS

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- 3.1 This document has reports on the outcome of a review undertaken by RPS on the ES produced by AECOM in support of the detailed planning application for redevelopment of the 'Canterbury House' site.
- 3.2 A number of omissions and weaknesses in the ES have been identified by RPS which necessitate the provision of further information or clarification from the Applicant or AECOM. The most substantive of these issues, identified as red within the above tables, are as follows:
- The proposed Privacy Screen between the existing Canterbury House and the proposed building is a key 'mitigation feature' of the design. However, its related impacts (e.g. effects on views, daylight, sunlight, wind etc.) have not been assessed within the ES. This is a material omission of the ES;
  - Where significant residual effects ('moderate' to 'major adverse') have been identified which do not appear capable of adequate mitigation (e.g. construction noise and vibration), more details are necessary in order to determine whether such effects can be reduced to levels which might be deemed acceptable;
  - There are some contradictory statements in the ES over whether or not the existing residents of Canterbury House will remain in place throughout construction works or whether these tenancies will be temporarily vacated. This should be clarified.
  - On what basis has the 9m separation distance between the new building and Canterbury House been justified, including environmental considerations?
  - The authors of the noise chapter should confirm that the assessment of construction noise and vibration has been based on the construction details (including assumed plant) described in Chapter 5 and that this assessment has identified effects which would constitute a 'worst case';
  - A "major adverse" effect on Canterbury House for daylight and sunlight is noted, which is likely to significantly affect the internal amenity for tenants of these properties, especially given the small apartment sizes. Therefore, the Applicant must explain why such major adverse effects are considered to be acceptable, and whether all reasonable mitigation methods/ design iterations been considered to reduce this effect?
  - Whilst the impact of the proposed development on Emerald House is slightly less than for Canterbury House, these impacts appear to be significantly worsened once the committed 1-5 Lansdowne Road scheme is taken into account. Again, the Applicant should explain why such adverse effects are considered to be acceptable, and whether all reasonable mitigation methods/ design iterations been considered to reduce this effect?;
  - The number of cycle parking spaces is not clear and differs throughout the ES, NTS and Planning Statement; and
  - The 'minor adverse' impacts on GP spaces needs further justification, including cumulative effects.

- The Townscape, Visual and Built Heritage Impact Assessment (TVBHIA), forming Volume 2 of the ES, should be supplemented by an additional view and analysis of the impacts on the Grade 1 St Michael and All Angels Church, accounting for the cumulative effects with the proposed St Michael's Square development (as requested by Historic England). Moreover, further assessment is required of the impacts of Privacy Screen on townscape, including updating all relevant views in which it would be visible.
- The internal daylight and sunlight report (submitted separately to the ES) appears inadequate for the reasons set out in this report.

3.3 A number of less critical observations/ points of clarification have also been identified and responses to these are requested.