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Canada Water Masterplan

Environmental Statement Addendum Review

ESA Review Report

Prepared by LUC in association with Ricardo Energy & Environment and Clewlow Consulting

August 2019



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Planning & EIA
Design
Landscape Planning
Landscape Management
Ecology
GIS & Visualisation

LUC BRISTOL
12th Floor Colston Tower
Colston Street Bristol
BS1 4XE
T +44 (0)117 929 1997
bristol@landuse.co.uk

Offices also in:
Edinburgh
Glasgow
Lancaster
London
Manchester



FS 566056 EMS 566057

Land Use Consultants Ltd
Registered in England
Registered number: 2549296
Registered Office:
43 Chalton Street
London NW1 1JD
LUC uses 100% recycled paper

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1 Introduction

- 1.1 This document sets out the review of the June 2019 Addendum to the Canada Water Environmental Statement (ES). This Environmental Statement Addendum (ESA) Review Report was issued in July 2019 and has been updated in August 2019 to incorporate additional comments received from the Applicant. The review has been carried out by LUC in association with Clewlow Consulting and Ricardo Energy & Environment.
- 1.2 The review of the June 2019 Addendum builds upon the following previous reviews of the ES and associated documents:
 - January 2018: Review of the Scoping Report (May 2017);
 - July 2018: Draft Review Report (DRR) for the original ES (May 2018 ES);
 - October 2018: Review of scheme amendments (October 2018 Addendum);
 - November 2018: Final Review Report (FRR) for the original ES; and
 - May 2019: Review of scheme amendments (February 2019 Addendum).
- 1.3 The ES for the scheme now comprises the May 2018 ES, the October 2018 ES Addendum, and the June 2019 Addendum.
- 1.4 The Application assessed by the ES comprises the Detailed Proposals, Plots A1, A2 and K1 and Interim Petrol Filling Station for which no matters are reserved, and the Outline Proposals, outline Development proposals for the remainder of the Site, with all matters reserved. The Detailed Proposals and the Outline Proposals together are referred to as the Development. The ES assesses the effects of the Detailed Proposals individually and the Development as a whole.

June 2019 ES Addendum

- 1.5 The June 2019 ES Addendum has been provided in the following volumes:
 - Non-technical summary;
 - Volume I - Main chapters;
 - Volume II – Figures; and
 - Volume III - Technical appendices.
- 1.6 The addendum responds to the changes set out below.

Amendments to petrol filling station

- 1.7 The design of the petrol filling station has been revised; however the applicant states that the changes have been reviewed and considers that this will not arise in any material change to the effects identified in the May 2018 ES and October 2018 ES Addendum.
- 1.8 Clarification is sought as to who has reviewed the changes. If the specialists who have undertaken the Ground Conditions, Townscape, Archaeology, and Transport EIA assessments have confirmed that the changes will not result in any material changes, then this is acceptable. Otherwise, further justification is sought.

Highways schemes and modelling

- 1.9 Since the submission of the May 2018 ES and October 2018 ES Addendum, Transport for London (TfL) and London Borough of Southwark (LBS) Council have been progressing the design of three highways schemes close to the site. Given the development of these schemes since the original

ES, Southwark Council requested further Environmental Impact Assessment (EIA) , with the highways schemes forming part of a future baseline scenario.

- 1.10 The revised highways modelling means that the transport ES chapter has been revised. In turn, this has required changes to the air quality and noise & vibration ES chapters.

Amendments to the housing model

- 1.11 The May 2018 ES was based on an indicative housing mix. Following viability analysis and detailed design, this has been updated. The socio-economic ES chapter has therefore been updated to reflect revisions to the housing mix, which feeds into child yield and affects education and children’s play requirements.

Review Report

- 1.12 This report sets out a review of the June 2019 Addendum. The purpose of this report is to provide advice to the LBS as to whether or not the conclusions of the May 2018 ES and October 2018 ES Addendum remain valid, or whether further information may be required for the purposes of Regulation 25 of the EIA Regulations.
- 1.13 It should be noted that this report supplements rather than supersedes LUC’s previous review reports.
- 1.14 Each chapter of this report reviews the corresponding sections of the Addendum documents. Where there are outstanding issues raised in the FRR (only the case for the transport assessment), these have been included for information. Section 6 summarises the findings of this review.

August 2019 Update

- 1.15 Following the issue of this ESA Review Report (July 2019), further commentary in response to the outstanding clarifications (IN1 and SE1) and Regulation 25 Issues (TA4, TA5, TA6, TA7 and TA8) was received from the Applicant, on 2nd August 2019. This updated ESA Review Report provides a response to those comments. These are presented in the relevant technical chapters (as in Table 1.2, below) and are summarised in Chapter 6, **Tables 6.1** and **6.2**.

Table 1.1 Clarifications and Regulation 25 issues (Introduction)

Ref.	Summary of Clarifications Required from Applicant (July 2019)
IN1	Clarification is sought as to who has reviewed the changes to the petrol filling station. If the specialists who have undertaken the Ground Conditions, Townscape, Archaeology, and Transport EIA assessments have confirmed that the changes will not result in any material changes, then this is acceptable. Otherwise, further justification is sought.
Summary of Potential Regulation 25 Information Requests to be made to Applicant	
	None

Table 1.2 August 2019 update

Ref.	Summary of Response Received from Applicant (August 2019)	Reassessed conclusion (August 2019)
IN1	Clarification is sought as to who has reviewed the changes to the petrol filling station. If the specialists who have undertaken the Ground Conditions, Townscape, Archaeology, and Transport EIA assessments have confirmed that the changes will not result in any material changes, then this is acceptable. Otherwise, further justification is sought.	Acceptable No further clarification is sought.

2 Transport

Outstanding issues from FRR

2.1 Some of the issues raised in the FRR remain. These are shown in **Table 2.1**.

Table 2.1 Outstanding Transport issues from FRR

Ref.	Request type	Original request	Reassessed conclusion (Oct 2018)
TA4	Regulation 25	Identify receptors clearly and determine sensitivity of receptors.	<p>Not Acceptable</p> <p>It is acknowledged that additional content has been added within the Assessment Methodology and Significance Criteria section to explain the presumed sensitivity of each receptor type and the basis on which this has been identified. It is further acknowledged that the table of significance criteria in the same section of the Chapter has also been updated to provide further clarity and information on the issues considered when determining the significance of effects on certain receptors.</p> <p>In Table 8.4, however, the criteria stated for pedestrians and cyclists are inconsistent with the high ranking of sensitivity accorded this grouping in Table 8.3. Whereas the thresholds stated for the Major, Moderate and Minor Beneficial impacts are higher than the equivalent for the medium sensitivity groupings (as would be expected), the thresholds for Insignificant together with Minor, Moderate and Major Adverse impacts are lower. This inconsistency leads to the counter-intuitive finding that, for example, an increase of over 50% in the number of HGVs has a more severe impact on those with medium sensitivity than it does on with high sensitivity</p> <p>The statements of impact in Para 8.160 cannot therefore be accepted.</p> <p>This Regulation 25 request remains.</p>
TA5	Regulation 25	Identify which effects are likely to be experienced by receptors and determine which thresholds are appropriate for determining significance of each effect.	<p>Not Acceptable</p> <p>It is noted that additional content has been added within the Assessment Methodology and Significance Criteria section to explain which effects are likely to be experienced by receptors and determine which thresholds are appropriate for determining significance of each effect.</p> <p>However, for the reason set out in the reassessment of Comment TA4 above, the thresholds as stated in Table 8.4 are not accepted.</p> <p>This Regulation 25 request remains</p>
TA6	Regulation 25	Review judgements made on significance of effect on receptors (ref Paras 8.156 – 8.158, 8.162 – 8.167, 8.289 – 8.291. 8.294 – 8.296 and 17.33-17.34).	<p>Not Acceptable</p> <p>For the reasons set out in the reassessments of Comments TA4 and TA5 above, it is considered that the judgements made on significance of effects on pedestrians and cyclists in the successor paragraphs to those referred to previously require further review.</p>
TA7	Regulation 25	Reformat conclusions so that it is clear which receptor is subject to what effect and to what degree.	<p>Not Acceptable</p> <p>The format of the Conclusions is acceptable however for the reasons set out in the reassessments of Comments TA4 and TA5 above, it is considered that the judgements made on significance of effects on pedestrians and cyclists in Table 8.44</p>

Ref.	Request type	Original request	Reassessed conclusion (Oct 2018)
			require further review. This Regulation 25 request remains.
TA8	Regulation 25	The Non-Technical Summary should be updated following review of the clarifications and Regulation 25 requests in this review.	Not Acceptable For the reasons set out in the reassessments of Comments TA4 and TA5 above, it is considered that the Non-Technical Summary remains to be updated. This Regulation 25 request remains

Review of ES Addendum

- 2.2 Since the submission of the May 2018 ES and the October 2018 ES Addendum, the ES Addendum advises that Transport for London (TfL) and Southwark Council have been progressing the design of three highway schemes within the vicinity of the Site. By improving facilities for cyclists and the public realm, these schemes will change the way in which the highway network operates and the levels of traffic using the network in different locations.
- 2.3 A supplementary analysis has been undertaken, which assumes that the Southwark Council / TfL highway schemes are included in the 2031 future baseline. In this scenario it is accepted that the outcomes of the assessment of the effect of the development reported in the May 2018 ES in relation to pedestrians and cyclists, as well as in relation to public transport, remain unchanged. However, because the proposed highway schemes will change the distribution of baseline traffic across the local highway network, the potential for changes to the extent and location of highway impacts that arise as a result of the Development has been assessed.
- 2.4 The ES Addendum states that the supplementary assessment follows the same methodology as the May 2018 ES and Transport Assessment (TA) and, in line with the above, changes in peak hour traffic flows are used to determine the significance of any impacts arising from the Development. As before, the assessment has been undertaken for two development scenarios; one development scenario represents a 'maximum residential' land use mix (Scenario 1A); the other development scenario represents a 'maximum employment' land use mix (Scenario 2A).
- 2.5 For Scenario 1A, Table 4.1 identifies a number of locations where changes will occur and sets out clearly the extent of the changes in traffic flow between the original baseline and the amended baseline. Although a direct comparison is not possible, the results associated with the amended baseline indicate a broadening of adverse impact on road users but with a small reduction in severity.
- 2.6 For Scenario 2A, Table 4.2 identifies a number of locations where changes will occur and sets out clearly the extent of the changes in traffic flow between the original baseline and the amended baseline. Although a direct comparison is not possible, the results associated with the amended baseline indicate a slight lessening of adverse impact on road users.
- 2.7 The ES Addendum states that, *'The May 2018 assessment concluded that, once the range of complementary design proposals and management measures being considered at that time were also taken into account, along with the potential for these to result in a shift from car journeys to travel by other means, the residual effect of the development on road users would be long-term, local adverse of minor significance'*. It is considered reasonable to conclude that, in the circumstances of the proposed development, some adverse impact on car drivers is acceptable in order to encourage greater use of the walking and cycling measures included.
- 2.8 In respect of the supplementary assessment carried out, the ES Addendum concludes that *'Consideration of the outcomes of the supplementary assessment suggests that, overall, the Development would have a long-term, local adverse effect of moderate significance on road users on the local highway network'* which is harsher than the assessment for the baseline without the highway schemes intended to improve cycling and the public realm. The ES Addendum seeks to explain this output on the basis that the approach to assessment is particularly robust and takes

no account of changes and commitments that have been made in relation to the Development proposals since the original assessment.

- 2.9 Although the ES Addendum makes it clear that the assessment carried out is of the effects of the development and not of the effects of the proposed highway schemes, since the three highway schemes re-purpose road space it is likely that, as a consequence, impacts on road traffic will be accentuated. Accordingly the assessment made and conclusions drawn are considered particularly robust.
- 2.10 A further mitigation measure is referred to in the ES Addendum and explained in the TA at Paragraphs 2.2.20 -2.2.22 that would involve a potential reduction in the number of non-residential car parking spaces made available as part of the development. Such a change would be likely to reduce the impact of the development on road users and at the same time encourage more walking, cycling and use of public transport so enhancing the benefits of the measures for these modes of transport included in the development as well as the benefits of the three highway schemes for non-motorised travel and enjoyment of the public realm.
- 2.11 Notwithstanding the satisfactory nature of the supplementary assessment of the transport impacts described above, the ES Addendum does not address the outstanding transport issues in the FRR as set out in Table 2.1 above.

Table 2.2 Clarifications and Regulation 25 issues (Transport)

Ref.	Summary of Clarifications Required from Applicant
	None
Summary of Potential Regulation 25 Information Requests to be made to Applicant	
	No Additional Requests

Table 2.3 August 2019 update

Ref.	Summary of Response Received from Applicant (August 2019)	Reassessed conclusion (August 2019)
TA4	<p>Off-road cyclists are cyclists using facilities that are segregated from other road users; Cycleway 4 (previously known as Cycle Superhighway CS4) will run in the vicinity of the site and will attract a number of off-road cyclists, and therefore it is appropriate to include them as part of the assessment. Several non-vehicular cycle routes within our site, as well as other cycle routes across the peninsula, can be used by off-road cyclists.</p> <p>Changes in the highway network have different effects on each receptor group and therefore the percentage changes in road traffic are not directly comparable. This means that the effects being assessed for each receptor group are different, even if they arise from the same changes in the environment.</p> <p>Footnote 6 to Table 8.4 of the replacement Chapter 8: Transportation and Access of the ES (Appendices 3 and 4 of the October 2018 ES Addendum), confirms that, in respect of pedestrians and cyclists, changes in traffic flows relate to considerations of severance and amenity for those receptors, rather the impact on journey times as they do for road users. Using a different set of thresholds for pedestrians and off-road cyclists (30%, 60% and 90%) from that used for road users is therefore considered equally appropriate for both beneficial and adverse effects. These users are generally segregated from 'direct' road traffic impacts as they are not part of road traffic itself and are only affected by local</p>	<p>Conditionally Acceptable subject to the inclusion of a requirement of the Construction Traffic Management Plan to mitigate the effects on pedestrian and cyclist users through segregation.</p> <p>The latest Applicant Response does not respond directly to the concern expressed previously that the threshold boundaries adopted in the method for determining the magnitude of effects for high sensitivity receptors produces the somewhat perverse findings set out in Paragraph 8.160 such that a 54% increase in traffic flows has Major Adverse effect on receptors with moderate sensitivity but only a Minor Adverse effect on receptors with high sensitivity.</p> <p>The latest Applicant Response seeks to explain that pedestrian and cyclist sensitivity is mitigated as these users are '<i>generally segregated</i>'. However the latest Applicant Response also states that, due to this general segregation, pedestrians and cyclists are '<i>only affected by local severance and amenity conditions</i>'. Since the acknowledged adverse effects will be experienced during the construction period it is generally at this time when localised impacts tend to be more pronounced.</p> <p>Notwithstanding that there remains a concern that the threshold boundaries selected in Table 8.4 are not equally appropriate for both beneficial and adverse effects on pedestrians and cyclists, it is accepted that different</p>

Ref.	Summary of Response Received from Applicant (August 2019)	Reassessed conclusion (August 2019)
	severance and amenity conditions. We also note that the 30%, 60% and 90% thresholds are in line with Institute of Environmental Management and Assessment (IEMA) guidelines.	thresholds may be appropriate for different types of receptors. In this particular circumstance it may therefore be more appropriate to ensure that the reason for so doing as suggested in the latest Applicant Response, namely that the effects on pedestrian and cyclist users are mitigated by segregation, is stated as a primary requirement of the Construction Traffic Management Plan. In this way particular attention will have to be paid to providing off-road or segregated routes for pedestrians and cyclists so that local severance and amenity effects are properly ameliorated throughout the construction period.
TA5	As reported in response to TA4, the significance of effects on receptors remains as reported in the October 2018 ES Addendum and there are no material changes to the conclusions of the May 2018 ES.	<p>Conditionally Acceptable subject to the inclusion of a requirement of the Construction Traffic Management Plan to mitigate the effects on pedestrian and cyclist users through segregation.</p> <p>For the reasons set out in the reassessment of Comment TA4 above, the thresholds as stated in Table 8.4 are conditionally accepted.</p>
TA6	As reported in response to TA4, the significance of effects on receptors remains as reported in the October 2018 ES Addendum and there are no material changes to the conclusions of the May 2018 ES.	<p>Conditionally Acceptable subject to the inclusion of a requirement of the Construction Traffic Management Plan to mitigate the effects on pedestrian and cyclist users through segregation.</p> <p>For the reasons set out in the reassessment of Comment TA4 above, the judgements on significance of effect are conditionally accepted.</p>
TA7	As reported in response to TA4, the significance of effects on receptors remains as reported in the October 2018 ES Addendum and there are no material changes to the conclusions of the May 2018 ES.	<p>Conditionally Acceptable subject to the inclusion of a requirement of the Construction Traffic Management Plan to mitigate the effects on pedestrian and cyclist users through segregation.</p> <p>For the reasons set out in the reassessment of Comment TA4 above, the Conclusions are conditionally accepted.</p>
TA8	As reported in response to TA4, the NTS requires no further amendments in this respect and the latest issued of the NTS (June 2019) remains valid.	<p>Conditionally Acceptable subject to the inclusion of a requirement of the Construction Traffic Management Plan to mitigate the effects on pedestrian and cyclist users through segregation.</p> <p>For the reasons set out in the reassessment of Comment TA4 above, the Non-Technical Summary does not require updating.</p>

3 Air Quality

Review of ES Addendum

- 3.1 In May 2019 the applicant’s clarification responses demonstrated that the scheme did not post an unacceptable risk to air quality.
- 3.2 The ES Addendum introduces and considers three further public highway schemes into the future baseline as they have the potential to alter assessment conclusions. The same significance criteria have been used as in the May 2018 ES.
- 3.3 The applicant has evidenced that updates to the future baseline do not alter the conclusions of Canada Water’s impact upon local air quality.

Table 3.1 Clarifications and Regulation 25 issues (Air Quality)

Ref.	Summary of Clarifications Required from Applicant
	No further clarifications required.
Summary of Potential Regulation 25 Information Requests to be made to Applicant	
	None.

4 Noise & Vibration

Review of ES Addendum

- 4.1 The ES Addendum refers to revised development scenarios and takes account of updated road configurations from LBS. The updated traffic flows have been used to predict corresponding changes to noise levels.
- 4.2 Appendix 5.1 of the ES Addendum shows the detailed calculations for each road link using the recognised methodology of CRTN (Calculation of Road Traffic Noise). A reasonable limitation has been made by considering only those sections where 18hr flows exceed 4,000 Annual Average Weekday Traffic (AAWT) and a change of flow of at least 25% is anticipated as this corresponds to a minimum perception limit of a 1dB change.
- 4.3 The same significance criteria have been used as in the May 2018 ES. The difference of significance between the June 2019 scenarios and that reported in the May 2018 ES is shown in Tables 5.2 and 5.3 of the ES Addendum.
- 4.4 Appropriate conclusions have been drawn, showing a change to a moderate adverse effect on just one road, Deal Porters Way. Minor adverse effects are predicted on 14 links but minor to moderate beneficial effects predicted on a similar number of other links.
- 4.5 The assessment shows broad agreement with the findings of the May 2018 ES with effects ranging from beneficial moderate to adverse moderate although different link roads are affected. The conclusions of the May 2018 ES on noise effects of traffic therefore are considered to remain valid after taking account of the revised development scenarios.

Table 4.1 Clarifications and Regulation 25 issues (Noise and Vibration)

Ref.	Summary of Clarifications Required from Applicant
	None
Summary of Potential Regulation 25 Information Requests to be made to Applicant	
	None

5 Socio-Economics

Review of ES Addendum

- 5.1 The June 2019 Addendum provides an updated ES chapter 7 Socio Economics (in Volume II) and a summary of how the changes to the assessment affect the findings presented in the May 2018 ES.
- 5.2 The scheme changes reflected in the updated Socio Economics chapter are:
- Affordable housing: The amount of affordable housing to be provided by the original Development was 35% within the Detailed Proposals only. The amount of affordable housing to be provided by the original Outline Proposals was to be subject to scheme viability, grant availability and other scheme requirements. The amount of affordable housing to be provided by the amended Development, as assessed by the June 2019 ES Addendum, is 35% affordable homes across the entire Development (Detailed Proposals and Outline Proposals), including 70% Social Rent in line with Southwark Council's Rent Standard and 30% Intermediate.
 - Student housing and elderly housing: These types of residential use have been taken out of the residential mix for the purposes of the assessment as they have lower child yield than other types of residential accommodation. This is to ensure that the assessment assesses the 'worst case' effects.
- 5.3 As was the approach for the May 2018 ES, the ES Addendum states that the Outline Proposals seek permission for an 'up to' maximum quantum of residential floorspace and that there is no detailed housing mix being applied for. Consistent with the October 2018 ES Addendum, which assessed the updated floorspace figures following the May 2018 ES, the June 2019 ES Addendum states that the Detailed Proposals seek permission for 265 new homes.
- 5.4 The ES Addendum no longer assesses student housing and elderly housing, which was previously assessed in the May 2018 ES. The addendum notes that this is because these types of residential uses tend to have a lower child yield; therefore testing the up to maximum levels of residential floorspace (without accounting for these specialist types of housing) represents the worst-case scenario in terms of likely socio-economic effects. This is considered to be an appropriate approach with regards to the effects on social infrastructure, however this may not be appropriate with regards to additional spend by residents.
- 5.5 The ES Addendum does not consider how the additional spend generated by residents may vary if student housing is included within the Development. As the estimated weekly spend by students is lower than that of households (as stated in the May 2018 ES), it may be that the estimated spend by residents, presented in the ES Addendum, actually represents a best-case scenario rather than worst-case. Clarification is sought as to whether the assessment has presented the worst case scenario for household spending or not. Regardless of the correct figure for additional spend by residents, however, the ES Addendum concludes that the impact of additional spending for the Detailed Proposals would be indirect, permanent, moderate beneficial (local), negligible (all other spatial scales), and that the impact of additional spending for the Development would be indirect, permanent, major beneficial (at the local level), minor beneficial (at borough level), negligible (at regional level) are considered to be valid and consistent with the May 2018 ES.
- 5.6 The ES Addendum notes that the updated housing mix affects the expected population and child yield, and that the overall population expected to live within the new homes is expected to increase marginally, but also notes that this is not a significant change compared to the May 2018 ES. The ES Addendum notes that the updated housing mix considered in the assessment, excluding student housing and elderly housing, results in a significant increase in the child yield living within the Development. In addition, the increased level of affordable housing (35%

committed across the amended Development, rather than just that committed within the original Detailed Proposals) increased the expected child yield living within the new homes. Therefore, the ES Addendum notes this increased the potential demand for social infrastructure, particularly education and playspace. However, it notes that, following proposed mitigation, the scale and significance of all the residual socio-economic effects remain as set out in the May 2018 ES; this is considered valid.

- 5.7 It is noted that the likely residual effects of the Detailed Proposals and the Development identified within the ES Addendum and the May 2018 ES are consistent, with the exception of the impact of the Development on primary education. This is assessed as direct, permanent, moderate adverse (local), negligible (all other spatial scales) within the June 2019 ES Addendum, but was identified to be negligible at all spatial scales within the May 2018 ES. These conclusions are considered to be valid.
- 5.8 The ES Addendum notes that the October 2018 ES Addendum and February 2019 Statement of Conformity set out updates to the quantum of floorspace within the Proposed Development, which have resulted in minor changes to the expected level of employment generated by the scheme. The June 2019 ES Addendum notes that this did not alter the scale or significance of the likely socio-economic effects identified within the May 2018 ES, which therefore remains valid. As this change was addressed within the October 2018 ES Addendum, this change is not considered as part of this review of the June 2019 ES Addendum.
- 5.9 Information that became available following the May 2018 ES has been included within the June 2019 ES Addendum in relation to education and health care facilities as well as updated claimant count data. The Addendum notes that the updated baseline assessment found that there was an increase in the level of surplus capacity available at both primary and secondary school level locally. This data was used to assess the updated development scenarios and the conclusions are considered to be valid and consistent with the May 2018 ES.
- 5.10 However, it is noted that the number of GP surgeries within 1 km of the Site varies from six within the May 2018 ES to five within the June 2019 ES Addendum. This change in baseline information was not noted within the October 2018 ES Addendum or the February 2019 Statement of Conformity. Although this change in baseline information is not noted within the June 2019 ES Addendum, the June 2019 ES Addendum has assessed the likely effects of the Detailed Proposals and the Development based on the updated baseline figure of five GP surgeries within 1km to be direct, temporary, minor adverse (local), negligible (all other spatial scales) for the Detailed Proposals, the residual effects to be negligible for the Detailed Proposals, and both the likely effects and the residual effects to be direct, permanent, direct, major beneficial (local), moderate beneficial (borough), negligible (regional) for the Development. This is considered to be valid and consistent with the May 2018 ES, despite the change in number of surgeries assessed.
- 5.11 The mitigation measures and residual effects identified in the ES Addendum are largely consistent with those identified within the May 2018 ES. The June 2019 ES proposes the use of Section 106 and employment and training initiatives, instead of the Social Regeneration Charter as identified within the May 2018 ES. It is concluded that these impacts remain valid.
- 5.12 Taking the above into account, the June 2019 ES Addendum, which assesses the changes to the Development scheme and the updated baseline information, results in no material changes to the findings of the original May 2018 ES.

Table 5.1 Clarifications and Regulation 25 issues (Socio-Economics)

Ref.	Summary of Clarifications Required from Applicant
SE1	Confirm whether the assessed household spending represents a worst-case scenario, following the excluding of student housing and elderly housing from the assessment.
Summary of Potential Regulation 25 Information Requests to be made to Applicant	
	None

Table 5.2 August 2019 update

Ref.	Summary of Response Received from Applicant (August 2019)	Reassessed conclusion (August 2019)
SE1	<p>Students would have a lower spend per head than average household spending. However, if any student accommodation comes forward as part of the Development, student units are smaller than standard residential units, therefore there would be likely to be a greater number of student households compared to if the equivalent amount of floorspace was delivered as standard housing. Therefore, the spending levels would broadly level out or the difference would not be significant and the assessment of household spending excluding student housing and elderly housing is considered to be a robust assessment of the likely potential effect in this regard.</p>	<p>Acceptable No further clarification is sought.</p>

6 Summary of Review

- 6.1 This review report has considered the information presented in the June 2019 ES Addendum, which responds to changes to the petrol filling station, highways schemes in the assessment baseline, and housing mix. The report has also been updated to incorporate comments received from the Applicant in August 2019.
- 6.2 Overall, the ES Addendum concludes that there is no material change to the findings of the ES. This is considered acceptable. No Regulation 25 issues have arisen as a result of the information provided in the ES Addendum. Table 6.1 has been updated to include the applicant's response and the subsequent LUC response to the outstanding clarifications.
- 6.3 The ES Addendum did not seek to address the outstanding Regulation 25 issues raised in previous review reports. These remained and were presented as Regulation 25 requests in **Table 6.2**. Table 6.2 has been updated to include the applicant's response and the subsequent LUC response to the outstanding Regulation 25 issues.

Table 6.1 Clarifications arising from the June 2019 ES Addendum

Ref.	Summary of Clarifications Required from Applicant (June 2019)	Summary of Applicant Response (August 2019)	Re-assessed Conclusion (August 2019)
IN1	Clarification is sought as to who has reviewed the changes to the petrol filling station. If the specialists who have undertaken the Ground Conditions, Townscape, Archaeology, and Transport EIA assessments have confirmed that the changes will not result in any material changes, then this is acceptable. Otherwise, further justification is sought.	The ground conditions (Waterman Infrastructure & Environment), townscape (Tavernor Consultancy), archaeology (MOLA) and transport (Arup) technical specialists who prepared the May 2018 ES have reviewed the changes to the IPFS and confirm the changes do not result in any material changes to their corresponding assessments.	Acceptable No further clarification is sought.
SE1	Confirm whether the assessed household spending represents a worst-case scenario, following the excluding of student housing and elderly housing from the assessment.	Students would have a lower spend per head than average household spending. However, if any student accommodation comes forward as part of the Development, student units are smaller than standard residential units, therefore there would be likely to be a greater number of student households compared to if the equivalent amount of floorspace was delivered as standard housing. Therefore, the spending levels would broadly level out or the difference would not be significant and the assessment of household spending excluding student housing and elderly housing is considered to be a robust assessment of the likely potential effect in this regard.	Acceptable No further clarification is sought.

Table 6.2 Outstanding Regulation 25 issues from FRR

Ref.	Original request (November 2018)	Reassessed conclusion (October 2018)	Summary of Applicant Response (August 2019)	Re-assessed Conclusion (August 2019)
TA4	Identify receptors clearly and determine sensitivity of receptors.	Not Acceptable It is acknowledged that additional content has been added within the Assessment Methodology and Significance Criteria section to explain the presumed sensitivity of each receptor type and the basis on which this has been identified. It is further acknowledged that the table of significance criteria in the same section of the Chapter has also been updated to provide further clarity and information on the issues considered when determining the significance of effects on certain receptors. In Table 8.4, however, the criteria stated for	Off-road cyclists are cyclists using facilities that are segregated from other road users; Cycleway 4 (previously known as Cycle Superhighway CS4) will run in the vicinity of the site and will attract a number of off-road cyclists, and therefore it is appropriate to include them as part of the assessment. Several non-vehicular cycle routes within our site, as well as other cycle routes across the peninsula, can be used by off-road cyclists. Changes in the highway network have different effects on each receptor group and therefore the percentage changes in road traffic are not directly comparable. This means that the effects being assessed for each receptor group	Conditionally Acceptable subject to the inclusion of a requirement of the Construction Traffic Management Plan to mitigate the effects on pedestrian and cyclist users through segregation. The latest Applicant Response does not respond directly to the concern expressed previously that the threshold boundaries adopted in the method for determining the magnitude of effects for high sensitivity receptors produces the somewhat perverse findings set out

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		<p>pedestrians and cyclists are inconsistent with the high ranking of sensitivity accorded this grouping in Table 8.3. Whereas the thresholds stated for the Major, Moderate and Minor Beneficial impacts are higher than the equivalent for the medium sensitivity groupings (as would be expected), the thresholds for Insignificant together with Minor, Moderate and Major Adverse impacts are lower. This inconsistency leads to the counter-intuitive finding that, for example, an increase of over 50% in the number of HGVs has a more severe impact on those with medium sensitivity than it does on with high sensitivity</p> <p>The statements of impact in Para 8.160 cannot therefore be accepted.</p> <p>This Regulation 25 request remains.</p>	<p>are different, even if they arise from the same changes in the environment.</p> <p>Footnote 6 to Table 8.4 of the replacement Chapter 8: Transportation and Access of the ES (Appendices 3 and 4 of the October 2018 ES Addendum), confirms that, in respect of pedestrians and cyclists, changes in traffic flows relate to considerations of severance and amenity for those receptors, rather the impact on journey times as they do for road users. Using a different set of thresholds for pedestrians and off-road cyclists (30%, 60% and 90%) from that used for road users is therefore considered equally appropriate for both beneficial and adverse effects. These users are generally segregated from 'direct' road traffic impacts as they are not part of road traffic itself and are only affected by local severance and amenity conditions. We also note that the 30%, 60% and 90% thresholds are in line with Institute of Environmental Management and Assessment (IEMA) guidelines.</p>	<p>in Paragraph 8.160 such that a 54% increase in traffic flows has Major Adverse effect on receptors with moderate sensitivity but only a Minor Adverse effect on receptors with high sensitivity.</p> <p>The latest Applicant Response seeks to explain that pedestrian and cyclist sensitivity is mitigated as these users are '<i>generally segregated</i>'. However the latest Applicant Response also states that, due to this general segregation, pedestrians and cyclists are 'only affected by local severance and amenity conditions'. Since the acknowledged adverse effects will be experienced during the construction period it is generally at this time when localised impacts tend to be more pronounced.</p> <p>Notwithstanding that there remains a concern that the threshold boundaries selected in Table 8.4 are not equally appropriate for both beneficial and adverse effects on pedestrians and cyclists, it is accepted that different thresholds may be appropriate for different types of receptors. In this particular circumstance it may therefore be more appropriate to ensure that the reason for so doing as suggested in the latest Applicant Response, namely that the effects on pedestrian and cyclist users are mitigated by segregation, is stated as a primary requirement of the Construction Traffic Management Plan. In this way particular attention will have to be paid to providing off-road or segregated routes for pedestrians and cyclists so that local severance and amenity</p>

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				effects are properly ameliorated throughout the construction period.
TA5	Identify which effects are likely to be experienced by receptors and determine which thresholds are appropriate for determining significance of each effect.	<p>Not Acceptable</p> <p>It is noted that additional content has been added within the Assessment Methodology and Significance Criteria section to explain which effects are likely to be experienced by receptors and determine which thresholds are appropriate for determining significance of each effect.</p> <p>However, for the reason set out in the reassessment of Comment TA4 above, the thresholds as stated in Table 8.4 are not accepted.</p> <p>This Regulation 25 request remains</p>	As reported in response to TA4, the significance of effects on receptors remains as reported in the October 2018 ES Addendum and there are no material changes to the conclusions of the May 2018 ES.	<p>Conditionally Acceptable subject to the inclusion of a requirement of the Construction Traffic Management Plan to mitigate the effects on pedestrian and cyclist users through segregation.</p> <p>For the reasons set out in the reassessment of Comment TA4 above, the thresholds as stated in Table 8.4 are conditionally accepted.</p>
TA6	Review judgements made on significance of effect on receptors (ref Paras 8.156 – 8.158, 8.162 – 8.167, 8.289 – 8.291, 8.294 – 8.296 and 17.33-17.34).	<p>Not Acceptable</p> <p>For the reasons set out in the reassessments of Comments TA4 and TA5 above, it is considered that the judgements made on significance of effects on pedestrians and cyclists in the successor paragraphs to those referred to previously require further review.</p>	As reported in response to TA4, the significance of effects on receptors remains as reported in the October 2018 ES Addendum and there are no material changes to the conclusions of the May 2018 ES.	<p>Conditionally Acceptable subject to the inclusion of a requirement of the Construction Traffic Management Plan to mitigate the effects on pedestrian and cyclist users through segregation.</p> <p>For the reasons set out in the reassessment of Comment TA4 above, the judgements on significance of effect are conditionally accepted.</p>
TA7	Reformat conclusions so that it is clear which receptor is subject to what effect and to what degree.	<p>Not Acceptable</p> <p>The format of the Conclusions is acceptable however for the reasons set out in the reassessments of Comments TA4 and TA5 above, it is considered that the judgements made on significance of effects on pedestrians and cyclists in Table 8.44 require further review.</p> <p>This Regulation 25 request remains.</p>	As reported in response to TA4, the significance of effects on receptors remains as reported in the October 2018 ES Addendum and there are no material changes to the conclusions of the May 2018 ES.	<p>Conditionally Acceptable subject to the inclusion of a requirement of the Construction Traffic Management Plan to mitigate the effects on pedestrian and cyclist users through segregation.</p> <p>For the reasons set out in the reassessment of Comment TA4 above, the Conclusions are conditionally accepted.</p>
TA8	The Non-Technical	Not Acceptable	As reported in response to TA4, the NTS	Conditionally Acceptable subject

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	<p>Summary should be updated following review of the clarifications and Regulation 25 requests in this review.</p>	<p>For the reasons set out in the reassessments of Comments TA4 and TA5 above, it is considered that the Non-Technical Summary remains to be updated.</p> <p>This Regulation 25 request remains</p>	<p>requires no further amendments in this respect and the latest issued of the NTS (June 2019) remains valid.</p>	<p>to the inclusion of a requirement of the Construction Traffic Management Plan to mitigate the effects on pedestrian and cyclist users through segregation.</p> <p>For the reasons set out in the reassessment of Comment TA4 above, the Non-Technical Summary does not require updating.</p>