

Royal Borough of Greenwich

Armourer's Court

Review of EIA Scoping Report

Final report

Prepared by LUC

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Royal Borough of Greenwich

Armourer's Court Review of EIA Scoping Report

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Chapter 1

Introduction

Purpose of the EIA Scoping Report Review

1.1 LUC was appointed on 31 January 2020 by the Royal Borough of Greenwich (RBG) to review the Environmental Impact Assessment (EIA) Scoping Report for a residential-led development located at Armourer's Court, off Arsenal Way, Woolwich (the Site).

1.2 The Scoping Report was prepared by WSP on behalf of Connected Living London (hereafter referred to as 'the Applicant'), and was submitted along with a request for a Scoping Opinion (SO) under Regulation 15 of the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017* (hereafter referred to as 'the EIA Regulations') in December 2019.

1.3 The purpose of the review is to provide independent advice to RBG regarding the preparation of an EIA SO for issue to the Applicant. RBG should also take into account the responses received from statutory consultees. RBG remains the determining authority for the SO and any direction provided to the Applicant.

1.4 Scoping guidance issued by the London Borough of Tower Hamlets (LBTH)¹ has been referred to in this review as this is considered to represent one of the most comprehensive guidance notes available for scoping development projects in urban areas.

The Proposed Development and Background

1.5 The development is expected to provide up to approximately 515 residential units and up to 1,000 square metres of non-residential floor space through a series of buildings surrounding a central podium (the 'Proposed Development').

1.6 The Site is associated with Crossrail as it is being designed as an Over-Site Development (OSD) for the Proposed Crossrail Woolwich Station central box. However,

¹ Tower Hamlets Council EIA Scoping Advice:
<http://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Revised-Scoping-Guidance-V2-Final.pdf>

design evolution is ongoing in consultation with consultees and key stakeholders.

1.7 The Site is located 400m south of the River Thames and is within close proximity to Woolwich Arsenal Docklands Light Rail (DLR) and National Rail Station. In addition, the Site is bound by Gunnery Terrace industrial facility to the north, Cornwallis Road to the east, Plumstead Road (A206) to the south and Arsenal Way to the west. To the north, east and west of the Site there are buildings in the IO Centre industrial estate.

Structure of the Review

1.8 This report comprises the following sections:

- Section 2 reviews the requirement for EIA for the Proposed Development and the general approach to the EIA as set out in the introductory text of the Scoping Report;
- Section 3 reviews the information provided on the proposed topics for detailed assessment in the EIA;
- Section 4 reviews the information provided on the topics proposed to be scoped out of detailed assessment in the EIA; and
- Section 5 provides the conclusions of this review and a summary table setting out the recommendations made. This table should be read alongside the rest of the review and not in isolation to ensure the context of recommendations is understood.

Chapter 2

Review of Approach to EIA

Requirement for EIA

2.1 Under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, “EIA Development” is defined as “development which is either:

- *Schedule 1 development; or*
- *Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.”*

2.2 Schedules 1 and 2 of the EIA Regulations detail projects that may require EIA. Schedule 1 projects, for which EIA is mandatory, are generally large-scale industrial and infrastructure projects while Schedule 2 developments are required to be screened for EIA where certain thresholds are exceeded.

2.3 The Proposed Development falls under Schedule 2 10(b) (Infrastructure Projects – Urban Development Projects) with the requirement for EIA being determined on the following thresholds:

- *“The development includes more than 1 hectare of urban development which is not dwellinghouse development; or*
- *the development includes more than 150 dwellings; or*
- *the overall area of the development exceeds 5 hectares.”*

2.4 The total Site area is approximately 0.84ha however, the Proposed Development is anticipated to exceed the threshold of 150 dwellings as set out in the EIA Regulations above. The Applicant has elected to submit an Environmental Statement (ES) to accompany the Full Planning Application. The ES defines the likely significant environmental effects of the Proposed Development.

Approach to EIA Scoping

Regulatory Requirements

2.5 Where an EIA Scoping Opinion is sought, the EIA Regulations set out that this should include the following information (Regulation 15):

1. *“A person who is minded to make an EIA application may ask the relevant planning authority to state in writing*

their opinion as to the scope and level of detail of the information to be provided in the environmental statement (a "scoping opinion").

2. A request under paragraph (1) must include—

a. in relation to an application for planning permission—

(i) a plan sufficient to identify the land;

(ii) a brief description of the nature and purpose of the development, including its location and technical capacity;

(iii) an explanation of the likely significant effects of the development on the environment; and

(iv) such other information or representations as the person making the request may wish to provide or make;"

2.6 Section 1.1.6 lists the competent experts appointed to undertake the relevant assessments in accordance with Regulation 18(5) and Schedule 4 of the EIA Regulations ("Information for inclusion in environmental statements"). Section 1.4 of the Scoping Report sets out the regulatory requirements for EIA and Section 1.6 sets out the purpose of the Scoping Report. Table 1-1 sets out the information to be provided in the Scoping Report. Table 1-2 sets out additional information that will also be provided in the Scoping Report. The structure of the EIA Scoping Report is provided in Section 1.7. Furthermore, Section 3.7 provides a list of the technical topics that are scoped into the ES and Section 4 provides a list of topics that are scoped out.

The Site and Surrounding Area

2.7 Chapter 2 Background and Context, under the subheading 2.2 'The Site and Surroundings' provides details relating to the location and setting of the Site, including existing surrounding and historical uses.

2.8 The chapter provides a description of the site boundaries and refers to Figure 1-2 Site Location Plan. The chapter provides details regarding the current state of the Site, which is presently used as a construction compound. This section also provides a description of the Royal Arsenal Conservation Area and Greenwich Air Quality Management Area (AQMA), in which the Site is located. Details are also provided regarding Flood Risk and distance from the River Thames.

2.9 The ES could also provide a more detailed small-scale map with labelled streets and buildings as Figure 1-1 does not include this.

Description of the Proposed Development

2.10 Chapter 2 Background and Context, under the subheading 2.1 'Description of the Proposed Development' describes the key components of the Proposed Development, noting that the design is still evolving.

2.11 The chapter confirms the size of the overall Site as 0.84ha. It also provides information on land use, development type, floor space and building height. The description is limited as the design of the Proposed Development is yet to be finalised, however, a brief description of the layout is given.

2.12 A series of buildings will surround a central podium. It is expected that there will be three buildings in the northern area of the Site and two in the southern area. The residential buildings will be arranged around a centralised amenity space, with vents and shafts located in the amenity space to enable the railway to operate underneath.

2.13 The ES report should include a figure showing the layout of the Proposed Development.

2.14 There are no details regarding the building massing; facades; quantum and distribution; soft and hard landscaping (including proposals for ecological enhancements); drainage; waste management; building services; and sustainability measures.

2.15 The ES should provide further details regarding the above aspects .

2.16 The main access to the Site is likely to come from the west, off Arsenal Way, however, this is not finalised. Furthermore, there will be 20 blue badge spaces and 2 standard spaces for the Crossrail station maintenance team. There is no detail regarding access for cyclists.

2.17 There are no details regarding phasing; construction methodologies; traffic management; and working hours. The future ES should include details of these features.

Assessment Methodology and Significance Criteria

2.18 Chapter 3 of the Scoping Report sets out the general approach to the EIA. The ES will consider sensitive receptors and any likely significant environmental effects in the construction and operational phases for each discipline. Each chapter will provide a section that assesses the main effects the development is likely to have on the environment under the specific discipline.

2.19 It is noted that, where possible, assessments will be undertaken with reference to applicable criteria and legislation. However, where it is not possible to directly quantify effects, a qualitative review will be undertaken based on available knowledge and professional judgement. This is considered

acceptable, but the ES should clearly justify the use of qualitative review.

2.20 Section 3.5.3 sets out several criteria that will be used to determine potential effects and provides a rationale for the selection of assessment terminology, such as whether an effect is 'Significant'. This is considered appropriate.

2.21 The chapter defines adverse and beneficial effects. Descriptions are also provided for major, moderate and minor positive/negative effects, along with negligible effects. Significant effects are those that are considered to be positive/negative moderate or higher. Table 3-2 also provides a standardised matrix that measures the sensitivity value of receptors against the magnitude of change to determine the significance of the effects.

2.22 Where relevant, specific comments on the proposed methodologies are provided within the topic specific chapters of the Scoping Report.

2.23 The Scoping Report does not provide a list of consultees. It is advised that the ES should provide a clear list of consultees.

2.24 The proposed structure of the ES includes a Non-Technical Summary (NTS) in Volume 4. This is considered appropriate.

2.25 The Scoping Report does not contain a section that outlines any difficulties encountered by the developer, it is advised that the ES include a section to explain any difficulties.

Cumulative Effects

2.26 The Scoping Report details a methodology for a cumulative assessment within chapter 17. The cumulative assessment considers in-combination effects and effect interactions.

2.27 In-combination effects refers to effects of the interaction of the Proposed Development with other projects ('committed developments') that may affect the same receptor. Other projects include foreseeable developments currently being determined, and development where planning consent has been granted.

2.28 Effect Interactions are anticipated where the interaction of multiple environmental effects from the Proposed Development can have an impact on the same receptor.

2.29 This methodology is considered acceptable.

Mitigation and Residual Effects

2.30 The Scoping Report's approach to mitigation and residual effects is set out in Section 3.4. The Scoping Report states that each technical chapter will outline elements of the

Proposed Development that are considered to be pre-mitigation scenario or inherent to the proposal. Environmental effects that cannot be avoided, or mitigated through design, will be assessed to determine their significance.

2.31 Within the relevant technical chapter, additional mitigation will be recommended for the relevant stage, either construction and/ or operation. The chapter also states that mitigation measures may be secured through a planning condition or included with other secured documents. This is considered acceptable. At this stage, the Applicant is not expected to go into detail on mitigation measures.

Alternatives

2.32 Chapter 3.6 of the Scoping Report states that the ES will include a separate chapter with a description of the reasonable alternatives studied by the Applicant. The alternatives considered will include the development design, size, scale, location and technology. Furthermore, this chapter of the ES will also state the main reasons for selection of the chosen option.

2.33 Chapter 3.6 also states that in line with EIA Regulations, the environmental effects of three alternative scenarios will be considered and described: the do-nothing scenario, continue with the scheme previously consented and alternative layouts. This is considered acceptable.

Chapter 3

Environmental Topics Scoped-In to the EIA

Air Quality

Scope

3.1 All relevant national, regional and local policies should be identified in the ES. The Applicant has correctly identified an appropriate range of industry standard guidance including:

- The IAQM's guidance on the assessment of dust from demolition and construction;
- The Mayor of London's Supplementary Planning Guidance for the control of dust and emissions during construction and demolition;
- Air quality neutral planning support;
- The GLA's Sustainable Design and Construction guidance; and
- Evaluating significance of air quality impact – IAQM Land-Use Planning & Development Control: Planning for Air Quality (2017).

3.2 The Applicant has not referenced local air quality management technical guidance (LAQM.TG (16)). For the avoidance of doubt this should be adopted within the modelling methodology.

3.3 As identified in the scoping statement, the Site is located in an Air Quality Management Area (AQMA). The AQMA is declared for exceedance of the annual mean NO₂ and 24-hour mean PM₁₀ objectives.

3.4 The Applicant has included the following impacts in the scope of the Air Quality Assessment:

- Change in ambient concentration of dust and particles due to demolition and construction activities within 350m of the Site boundary and within 50m of the roads within 500m of the Site boundary;
- Change in NO₂, PM₁₀ and PM_{2.5} concentrations associated with exhaust emissions from non-road mobile machinery and construction traffic;
- Changes in NO₂ concentrations associated with impacts from the development generated traffic and onsite energy generation plant, within 200m of the modelled road network; and

- Changes in PM₁₀ and PM_{2.5} concentrations associated with the operational traffic emissions, within 200m of the modelled road network.

3.5 These are considered acceptable and appropriate.

3.1 It is noted in Table 17-1 that there are committed developments with the potential for A3 property use. Should detailed planning be sought for A3 property use on the Site, an odour assessment of operation upon proposed and existing receptors should be undertaken.

Baseline

3.2 For the most robust assessment, the Applicant should ideally undertake a diffusion tube survey at the Proposed Development and areas most likely to be adversely affected by its emissions. Although the use of RBG's monitoring data is considered satisfactory to represent baseline air quality and model verification, for existing monitoring data to be satisfactory, there should be at least 3 monitoring locations available for model verification including these key locations:

- GW34;
- GW49; and
- The continuous analyser GN0, Burrage Grove.

Assessment and Mitigation

3.3 The proposed methodology includes a quantitative assessment of NO₂ and PM emissions from road sources and any significant proposed energy generation plant using dispersion modelling. This is considered acceptable and appropriate.

3.4 In paragraph 5.7.1, the consultant identifies that a qualitative assessment of construction traffic will be undertaken. Construction traffic should be considered for quantitative assessment by comparing traffic flows against IAQM's screening criteria. Should this trigger the criteria, it should be included in a detailed dispersion model with construction traffic route choices being selected to avoid any material impacts upon local air quality. All tiers of construction traffic used should be Euro VI compliant.

3.5 The Applicant has included an air quality neutral assessment within their proposed methodology. This inclusion is welcomed.

3.6 Consideration should be given to the Mayor of London's policy on achieving the World Health Organisation's recommended PM_{2.5} threshold of 10µg/m³.

3.7 The energy centre assessment should consider the Environment Agency's guidance for environmental permitting² if the screening criteria is met. The Applicant identifies that a 'qualitative' assessment of an energy centre will be undertaken in paragraph 5.7.1. Should the energy centre trigger the screening criteria.

3.8 In order to ensure compliance with the Habitats and Species Regulations 2017, the study should quantitatively assess the potential for impacts upon human health and ecological receptors. For locally designated habitat sites within 2km of the proposed development, and nationally/internationally designated sites within 10 km of the proposed development.

Cumulative

3.9 The Applicant should include a cumulative assessment of combined emissions from the proposed development, considering road traffic emissions and any emissions relating to the proposed energy centre. The ES should explain how these have been identified and assessed.

3.10 It is understood that the development is to be centred around the station box of Crossrail's Woolwich Station which is currently under construction. This includes station plant and tunnel ventilation equipment. The application will need to provide information regarding the impact of these emissions upon the proposed development.

Non-Technical Summary

3.11 The Non-Technical Summary should include a summary of significant effects identified by the assessment, the mitigation measures identified to reduce them and a summary of residual impacts.

Ground Conditions

Scope

3.12 The proposal is to assess the effects of the construction phase only. It is proposed that effects during the operational phase will be insignificant due to the implementation of mitigation measures, and the effects will therefore not be assessed.

3.13 It is considered premature to assess operational effects as insignificant as the full baseline and potential impacts arising during the operational phase have not been fully described. If the Applicant is proposing that embedded mitigation measures will deliver insignificant impacts, then a full description of pre-mitigation impacts and embedded

² www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit

mitigation measures should be provided. This is to ensure that appropriate planning conditions can be developed to ensure the delivery of such mitigation.

Baseline

3.14 The baseline assessment should include an informative history of the Site. According to the scoping report, this is not available from on-line historical mapping sources, due to the secrecy surrounding the Site's military use. Efforts should be made to find alternative sources of information regarding the past uses of the Site and potential contaminants arising from such uses.

Assessment and Mitigation

3.15 The proposed assessment methodology appears sufficiently robust, with the exception of the sensitivity of construction workers which is proposed as 'medium'. Under the proposed sensitivity criteria, a construction worker could suffer to a life-changing or fatal impact (for example, inhalation of significant quantities of asbestos, or detonation of munitions) and the significance of the impact would be considered as 'moderate'. The sensitivity of construction workers should be high. It is requested that the assessor gives due weight to the potential severity of exposure to asbestos, carcinogens, munitions and explosive/asphyxiant gases when undertaking the assessment.

3.16 The methodology takes into consideration a wide range of regulatory and industry guidance.

3.17 The assessment should include, in addition to impacts arising from soil contamination, impacts arising from UXO, armaments and explosives, asbestos, ground gases and vapours, contaminated groundwater, non-aqueous phase liquids and other ground conditions as appropriate.

Cumulative

3.18 No mention is made of assessing cumulative impacts. The assessment should include an assessment of the cumulative effects of off-site migration of dust, gas and groundwater.

Non-Technical Summary

3.19 The Non-Technical Summary should include a summary of significant effects identified by the assessment, the mitigation measures identified to reduce them and a summary of residual impacts.

Noise and Vibration

Scope

3.20 The proposed overall scope of the assessment covers all important noise and vibration issues likely to be relevant for the proposed development.

Baseline

3.21 A baseline noise survey has been proposed and has been described in adequate detail. The baseline conditions refer to potential sources of vibration from the railway thus, although not mentioned in the report, baseline vibration measurements should also be undertaken.

3.22 The survey monitoring positions and methodology are to be agreed with RBG Environmental Health officers.

Assessment and Mitigation

3.23 Relevant methods for the assessment of significant effects have been described for construction noise, traffic noise and fixed plant noise.

3.24 Relevant standards and guidance documents for the assessment of Site suitability have been described. However, although the criteria for assessing vibration in buildings has been included, the methodology for calculating vibration levels in buildings over the railway has not been specified. The significance of operational vibration is not included as an issue in Table 7.1 or 7.2. Regard to operational vibration impacts from the Proposed Development should be included within the ES.

3.25 The statement on mitigation refers to the provision of additional measures where significant effects are identified but does not include typical examples of relevant measures. A description of mitigation measures proposed as well as residual effects after mitigation is to be included in the assessment undertaken.

Cumulative

3.26 There is no reference in the noise and vibration section to the methodology for assessing the cumulative effects from the nearby committed developments described in Chapter 17. The assessment should include an assessment of the cumulative effects of noise and vibration having regard to nearby committed developments in the vicinity of the Site.

Non-Technical Summary

3.27 Although not mentioned in the noise and vibration section it is assumed that a summary of the effects will be included in the NTS.

Water Resources and Flood Risk

Scope

3.28 Chapter 8 of the Scoping Report goes into detail with regards to flood risk from fluvial and surface water sources, touching on drainage.

3.29 Based on the research presented in the Scoping Report it is agreed that the Applicant's conclusion to scope in the chapter is sound. It is noted that certain elements of the topic are scoped out and these are considered appropriate.

Baseline

3.30 Flood risk to the Proposed Development is correctly identified as being located entirely within Flood Zone 1. It is also worth noting that Flood Zone 3 (area benefitting from defences) lies directly north of the Site. Therefore, it is agreed that the Site is at low risk of fluvial flooding. Furthermore, it is assessed that the Site is not at risk from flooding from reservoirs or other artificial sources.

3.31 With regards to surface water the development is correctly identified as being located in an area of very low chance of flooding from pluvial sources and currently no flow paths are identifiable. It should be noted that any changes to the topography of the Site may increase the risk of introducing new flow paths onto and off the Site.

3.32 The geological baseline conditions have been identified and conclusions drawn are considered appropriate. The report states that the Site lies within Zone A 'limited potential for groundwater flooding to occur', as identified in the Royal Borough of Greenwich Strategic Flood Risk Assessment (2017). Given that the Proposed Development does not include any basements it is agreed that groundwater risk is considered low.

3.33 The main ES would benefit from an understanding of the flood history (if applicable) in relation to surface water and groundwater flooding in or around the development.

3.34 The baseline does not take into account the water and sewerage infrastructure. As the development is proposed for 515 residential units, this is considered significant in terms of potable water and sewerage demand. The Applicant should undertake an analysis in the main ES to estimate the incoming potable water usage and outgoing wastewater volumes in close consultation with Thames Water, to understand the impact it may have. Furthermore, the water and sewerage network (as a receptor) presents an opportunity for sustainability/water reduction gains, which should be addressed within the ES.

3.35 It is noted that the proposed assessment methodology will take into account data and information from consultation

with relevant stakeholders, such as the Environment Agency and, planning authorities and Thames Water. The qualitative and quantitative assessment methodologies outlined are considered appropriate.

Assessment and Mitigation

3.36 The Scoping Report identifies the sensitive receptors and indicates the link to Ground Conditions with regards to groundwater quality issues, which are agreeable. It is good practice that this assessment will also inform the Water Resources and Flood Risk ES chapter, such as the exclusion of infiltration techniques.

3.37 The Scoping Report differentiates between the likely significant and likely insignificant effects. These are considered appropriate.

3.38 The Scoping Report states that a CEMP will be produced to manage impacts during construction and that a surface water drainage strategy will also be developed. The CEMP should be a robust document that identifies the key and residual effects/risks and their mitigation to the water environment, sufficient detail should be provided in the CEMP to describe the scope of mitigation measures proposed. The Drainage strategy should, as per best practice and planning considerations and guidance for developers given in the Royal Borough of Greenwich SFRA, consider the use of SuDS infrastructure to achieve better Greenfield runoff rates and flood storage (attenuation) to mitigate the risk of flooding elsewhere.

3.39 It is expected as part of the planning documentation (within Table 3-5) that a detailed site-specific Flood Risk Assessment will be produced to explore in detail the flood risk and drainage.

3.40 It is noted that SuDS are detailed as an 'opportunity for enhancing the environment'. Further to this opportunity SuDS are a powerful flood surface risk mitigation measure and a SuDS appraisal should be undertaken as part of the surface water drainage strategy and/or Flood Risk Assessment. Guidance can be sought from CIRIA and local authority guidance/experts and a London SuDS proforma completed to aid the planning application.

3.41 Limitations and assumptions are detailed in the Scoping Report, which is welcomed. They should be carried forward (and addressed, if practical) into the development of the ES.

Cumulative

3.42 Chapter 17 of the Scoping Report outlines the assessment methodology of Cumulative Effects, with regards to the assessment of 'in-combination' and 'effect interaction'. The assessment methodology is applicable however the study area for the cumulative effects (such as a radius from the

development Site) is not defined within Chapter 8 of the Scoping Report.

3.43 Chapter 17 includes a long list of nearby developments within 1km of the study Site. Due to the relatively low risk with regards to water resources in terms of flooding and hydrological connectivity (via surface water) 1km is considered acceptable for Water Resources and Flood Risk.

3.44 For the avoidance of doubt the assessment should include an assessment of the cumulative effects of impacts of water, including groundwater, having regard to nearby committed developments in the vicinity of the Site.

Non-Technical Summary

3.45 The Non-Technical Summary should include a summary of significant effects identified by the assessment, the mitigation measures identified to reduce them and a summary of residual impacts.

Socio-Economics

Scope

3.46 The inclusion of this topic within the EIA is appropriate.

3.47 Chapter 9 has clearly defined the study areas on a topic specific basis. Economy and Employment and Housing study areas have been defined as either Borough level or Greater London. Social Infrastructure study area has been defined as distances to education, healthcare, open space and play space. This is considered appropriate.

Baseline

3.48 The chapter clearly outlines the area from which the baseline is to be established. These key areas include population, economic activity & employment, deprivation, housing & tenure and local services & green space. The Applicant has already provided an estimate of the Borough's population, ethnicity and age. The chapter states that further detail will be provided within the socio-economic chapter of the ES. This is considered to be appropriate.

3.49 Key sensitive receptors have been identified through a desk-based study, using knowledge and understanding of the Site and past experiences of similar developments within Woolwich. The sensitive receptors include construction phase employees; future population increases; other residents and employees in the local area who utilise social infrastructure; and new facilities and amenities that may be delivered. These receptors are considered appropriate with regards to the Proposed Development. The identification of sensitive receptors is in line with scoping guidelines.

Assessment and Mitigation

3.50 The assessment methodology for the Proposed Development will follow standard EIA guidance and will include:

- consideration of local plans, policies and development constraints;
- assessment of permanence, scale and classification of impacts; and
- assessment of cumulative and residual impacts.

3.51 The assessment will also assess construction and operation direct, indirect and cumulative impacts.

3.52 The assessment will be carried out using a range of appropriate data sources such as ONS Labour Force Statistics and Census 2011. Furthermore, national standards such as those provided by HM Treasury and the Homes and Communities Agency will be used to appraise the impacts of the socio-economic assessment. However, where relevant standards do not exist, expert judgement and professional experience will be applied and justified which is considered appropriate.

3.53 The Scoping Report considers the effects and ways to measure impacts on key areas, such as:

- Construction and operational employment;
- Increases in housing stock and affordable housing;
- Additional local spend;
- Change in local service demand; and
- Change in open and play space demand.

3.54 The chapter considers socio-economic sub-issues that are relevant to the Proposed Development, which is in line with best practice guidelines.

3.55 The Scoping Report clearly defines how each assessment will be undertaken, whether it is through a qualitative or quantitative assessment. Where a qualitative assessment is undertaken, it should be clearly justified. Furthermore, the assessment recognises that there is no specific definition for significant socio-economics effects. Instead the Scoping Report states the relationship between the scale of the impact and the sensitivity of the affected receptor, along with the scope for mitigation should be considered when defining significance. This is considered acceptable.

3.56 Likely significant effects have been summarised in Table 9-1 and likely insignificant effects have been summarised in Table 9-2. The tables include the impact, phase, receptors and justification. This is considered acceptable.

3.57 The Scoping report states that the Socio-Economic Chapter in the ES will set out proposals and facilities that could reduce the identified effects. The ES will identify inherent design, additional, temporary and permanent mitigation measures, to avoid or reduce any adverse effects and maximise any positive benefits. Mitigation will be identified to ensure the impacts of the Proposed Development on the local community is minimised, along with any wider cumulative developments. This level of mitigation is considered acceptable.

3.58 The chapter also considers opportunities for enhancing the environment through maximising beneficial effects on the local community and environment. This is in line with best practice guidance. However, there are no details regarding how the proposed scheme intends to increase positive impacts. The ES statement should include details regarding how the Proposed Development will maximise beneficial effects on the local community and environment.

Cumulative

3.59 The chapter states that the effects of the Proposed Development and/or wider cumulative developments on the local community will be considered and minimised. The assessment criteria also includes the assessment of residual and cumulative impacts of the Proposed Development.

Non-Technical Summary

3.60 The Non-Technical Summary (NTS) is not discussed with the Socio-economics section of the Scoping Report however, the SR does state that Volume 4 of the ES will include an NTS. The socio-economics section of the NTS should provide sufficient information for the non-specialist reader to understand the main impacts of the proposal without reference to the main ES

Telecommunications

Scope

3.61 A summary of likely significant effects in table 10-5 sets out the effects, phase and receptors to be scoped into the assessment. This scope is considered appropriate.

Baseline

3.62 The baseline will be characterised by a desktop survey and a site visit will be undertaken to obtain information on adjacent building uses, heights and presence of TV receiving equipment. This is appropriate.

Assessment and Mitigation

3.63 The assessment consists of a desktop review of published telecommunications data together with a visual assessment of the Proposed Development, in order to identify the effect on TV, radio and satellite receivers. The Assessment Methodology should be carried out in accordance with the legislation and guidance identified in the scoping report.

3.64 A list of potential mitigation measures to reduce any significant effects on TV, radio and satellite reception has been set out within the scoping report.

Daylight, Sunlight and Overshadowing

Scope

3.65 Some of the receptors described in the text of section 11 are not included in Table 3-3 and should be added. That aside, the proposed scope of assessment for daylight, sunlight, overshadowing and solar glare is largely acceptable; however, the scope should be extended to include the existing residential units in Royal Carriage Mews (Blocks A and B). The ES should include a receptor location plan identifying the locations of the receptors.

Baseline

3.66 The proposed method for assessing baseline conditions is acceptable.

Assessment and Mitigation

3.67 The proposed method for assessing impact is largely acceptable. If, following the transient overshadowing assessment, it becomes apparent that a two-hours sun-on-ground assessment of Wellington Park is required, the latter should assess the children's play area and the garden of Foundry House as discrete amenity spaces.

3.68 It is accepted that the significance of effects will be determined using professional judgement and by reference to the range of factors recommended in Appendix I of the BRE guidelines. It is requested that the following scale of magnitude be used to categorise daylight/sunlight impacts:

- 0% to 20% loss (1.00 to 0.80 times former value) = negligible impact
- 21% to 30% loss (0.79 to 0.70 times former value) = small or minor impact
- 31% to 40% loss (0.69 to 0.60 times former value) = medium or moderate impact
- More than 40% loss (less than 0.60 times former value) = large or major impact

3.69 Summary tables should be provided for each test, stating the number of impacts on each receptor in each category. Impacts that would be outside the BRE numerical guidelines should be identified in the results and, preferably, on window maps in the ES technical appendices. Tabulated results and summary tables should also be provided to the Council and its daylight/sunlight reviewer in XLSX spreadsheet format.

3.70 It is noted that a daylight/sunlight consultant is advising the design team on potential effects to ensure a level of mitigation is built into the design process.

3.71 The proposed submission of a standalone report on daylight, sunlight and overshadowing within the Proposed Development is considered acceptable. If average daylight factor will be assessed, the report should state which method of calculation has been used and all relevant assumptions, including maintenance factor (dirt on glass), diffuse light transmittance of glazing, frame and glazing bar factor (unless window framing is modelled), and surface finishes and reflectance's.

3.72 The standalone report should include tables of daylight/sunlight results and summary tables showing the number and percentage of main living rooms (including dining rooms, living/kitchen/dining rooms (LKDs) and kitchen-diners (KDs)) and bedrooms within each block, and within the Proposed Development as a whole, that satisfy the minimum recommendations. Rooms that would be below guideline levels should be identified in the tables of results and preferably on floor plans annexed to the report.

Cumulative

3.73 It is noted that cumulative effects will be assessed in combination with other committed schemes including Building 10, Royal Carriage Mews. The assessment should include an assessment of the effects of the Proposed Development on daylight/sunlight to the dwellings within that committed scheme.

Non-Technical Summary

3.74 It is noted that a Non-Technical Summary of the findings will be provided at Volume 4 of the ES.

Environmental Wind

Scope

3.75 In general, the Applicant clearly describes the proposed methodology and assessment. Where appropriate, the Applicant follows industry standards and typical methodology for environmental wind assessments.

3.76 The Applicant proposes to assess the wind speed at pedestrian levels at the Site and its surroundings with particular attention to wind effects in open amenity spaces, building entrances and pedestrian routes. Other potential wind effects including wind loads, structural response, natural ventilation and internal flows are not within the scope this assessment. The assessment scope also excludes impacts on vehicles or waterways. It is typical for environmental wind assessments not to include the aforementioned potential wind effects.

3.77 The Applicant will assess likely significant environmental wind effects on the Site during construction and operation.

Baseline

3.78 The baseline assessment will be carried out as a representation of the existing condition, i.e. the existing buildings on the Site within the existing surroundings. Any buildings under construction within 500m from the site will be considered as completed as part of the baseline assessment. This is a reasonable assumption. The baseline assessment will be used as a reference point from which the magnitude of change will be measured once the Proposed Development is assessed under equal conditions. This is part of the typical methodology for environmental wind assessments.

Assessment and Mitigation

3.79 Following best practice, the extent of the study covers an area with a radius 500m from the Site with buildings beyond this radius being represented in the model if their distance from the region of interest is less than six times their height.

3.80 The assessment of the wind microclimate impacts comprises 3 scenarios, namely the Baseline Scenario, the Proposed Scenario and the Cumulative Effects Scenario. The Baseline Scenario will assess the existing Site with the existing building on the Site with the existing surrounding context. The Proposed Scenario will assess the Proposed Development on the Site with the existing surrounding context. The Cumulative Effects Scenario will include the effects of the proposed scheme in combination with other future (consented) schemes.

3.81 The Applicant identified sensitive receptors, which are usually considered for environmental wind assessments.

3.82 The Applicant will not quantitatively assess the potential effects on wind microclimate at the Site during the demolition and construction works as this will continuously vary as construction progresses but will use professional judgement. This is a typical methodology for environmental wind assessments.

3.83 During the Operational stage of the Site the Applicant will use the Lawson Comfort Criteria and Lawson Safety

Criteria to assess the significance of the predicted environmental wind effects. The Lawson Comfort and Safety Criteria are the industry standard for assessing the significance of wind effects.

3.84 The Applicant states that where the results of the assessment identify areas where the recommended standards are not met or where the suitability exceeds that of the intended use, mitigation measures will be identified to limit the adverse effect of the Project and/or achieve suitability for the designated uses. It could be considered, if required, to include the testing of the mitigation measures as part of the current scope or to include it during a later stage, such as the design stage.

3.85 The Applicant proposes to use CFD (Computational Fluid Dynamics), which is an appropriate method to predict wind speeds. It is important, however, that the model follows best practice guides to ensure accuracy of the predicted results. Furthermore, the Applicant proposes to use long-term wind data records from London City Airport weather station adapted to the Site. This is a typical methodology for predicting wind speeds within London.

3.86 The model will exclude landscaping to represent the worst-case scenario. This is common practise for assessing the wind speeds prior to the implementation of mitigation measures.

Cumulative

3.87 As mentioned above in item 3.85 the Applicant will assess a Cumulative Effects Scenario, where future (consented) schemes will be included. Furthermore, any buildings under construction within 500m from the Site will be considered as completed as part of the assessment. No further details on the schemes that will be included in the Cumulative Effects Scenario, however, the Applicant is aware of the importance of assessing cumulative effects.

Non-Technical Summary

3.88 The Applicant states that a Non-Technical Summary for environmental wind will be included in the Environmental Statement.

Townscape and Visual Impact Assessment

Scope

3.89 The Scoping Report refers to the appropriate guidance for carrying out Townscape and Visual Impact Assessment (TVIA), namely the Guidance for Landscape and Visual Impact Assessment Third Edition (GLVIA3). This is appropriate.

3.90 It is stated in Paragraph 13.1.1 that the TVIA study area *“will include both the Site and its wider context at 500m radius”* and that *“further distant visual receptor and representative views will be considered over a two kilometre radius where identified as relevant”*. The report states that this has been determined by a Zone of Theoretical Visibility (ZTV), although this is not presented graphically as a figure/illustration. The ZTV, or a refined version of it, should be included as part of the TVIA to justify the choice of study area, as well as choice of assessment viewpoints. The study area for the TVIA should include all areas likely to be significantly affected (either directly or indirectly) by the development.

Baseline

3.91 Some work has already been done on the baseline, including a description of the Site and its surroundings in terms of physical townscape features, and designated areas. Specific mention is made to the Royal Arsenal Conservation Area and Woolwich Conservation Area in relation to townscape, which is appropriate. However, it is important that this is also considered within the Built Heritage section of the ES to allow for a more thorough understanding of heritage significance and setting issues.

3.92 It is noted that at a national level the Site falls on the boundary between the National Character Area (NCA): 81 Greater Thames Estuary and NCA 112: Inner London; and at a regional level on the boundary of the Landscape Character Types of Lower Thames Floodplain and South London Pebbly Sands. It is concluded that, as both these assessments *“cover a wide area ... the scale is such that there would be no notable effect resulting from the Proposed Development”*. This seems appropriate, although further justification for scoping these areas out should be set out in the TVIA.

3.93 The SR notes that as RBG currently have no published Townscape Character Assessment, it is proposed that townscape character areas are established for the purposes of undertaking the TVIA. This is appropriate, but the established character areas should be drawn up at an appropriate scale and level of detail, following current best-practice guidance, including Natural England's 'An Approach to Landscape Character Assessment' (2014), the Landscape Institute's Technical Information Note 05/2017 'Townscape Character Assessment' (2018) and the Mayor of London's 'Shaping Neighbourhoods: Character and Context' SPG (2014). Further to this, and dependent on the extent of the ZTV for the Proposed Development, characterisation Studies that have been undertaken in neighbouring boroughs (e.g. Newham Character Study, London Borough of Newham, 2017) may need to be considered along with any relevant guidance.

3.94 Four 'townscape character area receptors' are listed in paragraph 13.3.2, although a clear rationale for their selection

is not provided and they are not illustrated graphically. Rationale and mapping should be provided as part of the TVIA.

3.95 Visual receptors are very broadly defined in paragraph 13.2.7 and will need to be further refined within the TVIA.

3.96 Paragraph 13.3.4 sets out a proposed list of 17 'visual receptor representative viewpoints' (RV) which will be assessed. We have not reviewed these on the ground for suitability, but the report states that these have been agreed with RBG. RBG should ensure that it is in agreement with the RVs. The RV locations will need to be presented graphically as a figure/illustration in the TVIA

3.97 In regard to protected views, the Scoping Report states that whilst the Site is not within the viewing corridor for any of the 'LVMF' views, development on the Site may affect a local view identified within RBG Core Strategy (No. 2 Shrewsbury Park towards the Lower Thames). This view is listed as a representative view, which is welcomed.

3.98 It is stated in paragraph 13.2.8 that *"a series of representative views have been identified to test the Proposed Development in a series of Accurate Visual Representation (AVRs)"*, which is welcomed. Whilst it is stated that these have been agreed with RBG, only broad locations for these are indicated in paragraph 13.2.10 (e.g. *"In an area of open space, such as Shrewsbury Park, Wellington Park, Dial Arch Square and the Public Open Space near to Villas Road"*). The locations, format (e.g. wirelines, block models or fully rendered images) and whether/ how/ at what years landscape proposals will be shown, should also be agreed with RBG.

3.99 The AVR methodology is not clearly explained. This, and the capture of photography, should accord with best-practice guidance, including the Landscape Institute's Technical Guidance Note 06/19 on 'Visual Representation of Development Proposals'.

Assessment and Mitigation

3.100 Paragraph 13.4.2 states that *"temporary visual intrusion during construction"* will be considered within the ES. This suggests that only visual effects will be considered during the construction phase. To align with GLVIA3, both townscape and visual effects should be considered during the construction phase.

3.101 The Scoping Report notes that sensitivity of townscape and visual receptors will be determined through establishing their value and combining it with their susceptibility. This is appropriate and in accordance with GLVIA3.

3.102 The report outlines that the magnitude of impact will be determined by considering the size or scale of the Proposed Development, along with the geographical extent of the area

influenced and its duration. Whilst this is appropriate, no reference is made to the consideration of 'reversibility', which is required by the EIA Regulations and advocated within GLVIA3. This should be considered within the TVIA.

3.103 Table 13-9 presents a 'Matrix for classifying Significance of Effects', Judgements should be undertaken in accordance with GLVIA3, which states: *"To ensure that the reasoning behind the judgements is clear there should be more emphasis on narrative text describing the landscape and visual effects and the judgements made about their significance, with tables and matrices used to support and summarise the descriptive text, not to replace it"*. Therefore, a reasoned narrative should be provided for all identified effects within the TVIA.

Mitigation

3.104 Paragraph 13.5.2 sets out that mitigation measures will be embedded into the design of the Proposed Development, and may include layout, scale, façade design and material. This is welcomed.

3.105 The TVIA should describe the measures proposed to avoid, reduce, and remedy significant adverse effects. This should include an indication of the effectiveness of the stated measures and demonstrate a clear commitment to implementing the mitigation measures.

Cumulative

3.106 Paragraph 13.4.2 outlines that likely townscape and visual effects will be considered within the ES, taking into account changes due to the *"Proposed Development ... in-combination with relevant Cumulative schemes"*. This is appropriate and in accordance with the EIA Regulations and GLVIA3. Relevant cumulative schemes should be agreed with RBG.

3.107 Paragraph 13.7.9 states that AVRs will be prepared showing the Proposed Development and relevant cumulative schemes, which is welcomed and in accordance with GLVIA3.

Non-Technical Summary

3.108 The Non-Technical Summary (NTS) is not discussed with the TVIA section of the Scoping Report. The TVIA section of the NTS should provide sufficient information for the non-specialist reader to understand the main environmental impacts of the proposal without reference to the main ES.

Built Heritage

3.109 The inclusion of Built Heritage as a separate topic is welcomed. Consideration of heritage assets separately from landscape and visual receptors allows for a more thorough

understanding of heritage significance and setting issues to be reflected in the later stages of design and impact assessment.

Scope and Baseline

3.110Section 14.1 outlines the study areas to be used for the assessment but does not adequately explain the selection criteria for sensitive receptors. Conservation areas and registered parks and gardens are included within a 1km radius; listed buildings within a 500m radius and locally-listed buildings within a 200m radius, but without an accompanying justification for these study areas. Those for listed and locally-listed buildings may be insufficient to adequately assess the likely significant effects on setting, given the scale of the proposal (c.25 storeys + plant). It is noted that Chapter 13, Townscape and Visual Assessment, is based on a ZTV of 500m around the Site plus further distant visual receptors over a 2km radius where relevant.

3.111The Applicant is to provide a clearer explanation of the selection criteria, including reasons for the omission of a ZTV or ZVI from the built heritage methodology, particularly since Historic England (2017) *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (hereafter 'GPA 3') recommends their use to identify heritage assets and settings that may be affected.

3.112Locally-listed buildings are mentioned in the Baseline section at 14.2 and 14.3.4, but no other categories of non-designated heritage asset are included. Here, and later at 14.7.2, the Greater London Historic Environment Record (GLHER) is not included as a source of baseline information to inform the assessment. NPPF para.189 makes clear that the relevant HER should be consulted as a minimum requirement for assessment in any application. Failure to consult the GLHER may result in assets that could experience effects due to the development not being identified.

3.113The Applicant is to carry out a HER search, review the results to identify any built heritage assets that may experience effects and assess any that would for effects due to the scheme.

3.114The Applicant is also to ensure that readers of the ES can cross reference assets under discussion to sources of further information, such as listing descriptions, through use of appropriate asset reference numbers, e.g. National Heritage List (NHL) entry numbers for designated heritage assets, within the ES text and figures.

Identification of sensitive receptors

3.115Section 14.3 identifies those receptors (heritage assets) which the Applicant's initial assessment suggests have potential for effects due to the scheme. These are ascribed a value using significance criteria which are given in Table 14-3. Assets are described in groupings which are stated at 14.3.1 as having the same sensitivity and a similar geographical relationship with the Site. In the absence of figures to understand asset locations, the groupings appear to take a fairly coarse approach, largely grouping together assets based upon grading, in which some important variations in sensitivity may be lost.

3.116The Applicant is to ensure any grouping used for assessment is based on a balanced assessment of all aspects of sensitivity rather than on assumptions based solely on grade and that this is clearly reasoned in accompanying text in the ES.

3.117No figure is included to allow understanding of the location of assets under discussion in relation to the scheme. The Applicant is to ensure that figures are included within the ES which allow readers to understand the location of assets in relation to the scheme. Such figures are to include appropriate labels, e.g. NHL entry numbers for designated heritage assets, to allow identification of individual assets.

3.118It is acknowledged that there is no agreed methodology for assessing the impact on heritage assets within an EIA context. The applicant cites a range of broadly appropriate policy and guidance to inform their approach. There is, however, no reference to Historic England (2015) *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment* (aka GPA 2).

3.119The Applicant is to have regard to GPA 2 since it also lays out principles relevant to assessing the impacts of proposals and information requirements for Applicants.

3.120The Applicant's criteria for asset value (termed 'sensitivity') is laid out in Table 14-3. This values Grade II listed buildings and conservation areas as 'Medium'. No rationale for assessing these as of lower significance to other designated heritage assets is given³. NPPF makes no explicit distinction in the importance of designated heritage assets, merely in how acceptable harm or loss to them is, and the grading of listed buildings is purely advisory; all listed buildings are afforded the same legal protection and should be considered in the same way. Higher-graded assets are not intrinsically more sensitive to change in their setting; this is solely derived from the contribution of setting to their

³ The distinction often stems from the use of the Design Manual for Roads and Bridges (DMRB) Cultural Heritage approach to EIA. This used to distinguish between the sensitivity of Grade I and II* listed buildings (ascribed 'High' value)

and Grade II listed buildings and conservation area (ascribed 'Medium' value), this default distinction was removed in a recent update to DMRB (July 2019).

significance and how the Proposed Development may change that contribution and overall significance.

3.121The Applicant is to amend their criteria so that all designated heritage assets are assessed as of High value in the first instance.

Assessment of significant effects

3.122Table 14-1 summarises likely significant effects and Table 14-2 summarises likely insignificant effects. There is no clear statement as to what level of effect is considered significant within this topic or reference out to overarching ES criteria. Para 14.4.1 (4th bullet point) describes effects to assets' setting as 'indirect'. The Applicant is reminded that change to setting, although it causes no physical effect to an asset can directly affect its significance. The Applicant is also reminded that setting is not to be treated as an asset in its own right, and that the key points of consideration are how change in setting affects the significance and/or perception of an asset.

3.123It is recognised that Tables 14-1 & 14-2 are summary tables for the purpose of scoping and that there is, accordingly, no detailed narrative given to explain effects. The summary justifications given though raise what may be inconsistencies in approach, for example effects on *Middlegate House* (Table 14-1) are given as significant, while those on the immediately adjacent *Middle Gate and attached walls* (Table 14-2) are insignificant, although both are close to the Site.

3.124Applicant is to ensure a clearly reasoned rationale is given, based upon asset significance (incl. role of setting), so that readers can understand why heritage assets which are similarly located in relation to the scheme may experience different levels of effect.

3.125The assessment methodology proposed at 14.7.5 and 14.7.6 is generally sound. However, the terminology subsequently used in Table 14-3 and the narrative on sensitivity to change at 14.7.7 seem to confuse importance, significance and sensitivity as though these terms were interchangeable.

3.126The Applicant is to ensure that the ES presents a description of the significance of assets under consideration, a clear articulation of the role of setting in this significance and, where relevant, in the appreciation of the asset, and then transparently explains how the presence of the scheme would affect the asset's significance or the ability to appreciate it, in line with GPA 3.

3.127No reference is made to the use of visualisations to support explanation of effects to heritage assets. It is assumed that some visualisations will be utilised to illustrate aspects of setting change since this is common practice for this topic.

The Applicant is to ensure that, where visualisations are used to demonstrate effects to heritage assets, it is made clear, through cross referencing between the relevant sections of the ES and use of asset references, which asset/s the visualisation is being deployed to explain.

Mitigation

3.128Para. 14.5 states that mitigation, derived from heritage considerations, has been embedded in design but gives no detail on these measures. The Applicant is reminded that the ES needs to assess the scheme design as applied for and that measures already embedded into that design cannot be counted as mitigation to reduce or address effects to heritage assets resulting from that scheme.

3.129The Applicant is to ensure that any further mitigation proposed within the ES is clearly explained in terms of how the proposed measures address effects to the significance of heritage assets.

Magnitude and significance of effects

3.130The methodology for evaluating and ranking effects (paras. 14.7.8 onwards) is generally sound.

Cumulative

3.131Effects related to cumulative schemes are referred to in para. 14.4.1 but there is no specific methodology outlined for cumulative assessment.

3.132The Applicant is to ensure that the cumulative assessment clearly details how the presence of the cumulative schemes would affect the significance of the heritage assets under discussion. The Applicant is also to ensure that any visualisations used to demonstrate cumulative effects allow clear identification of the status of other schemes (i.e. consented, under construction, in planning).

Transport and Access

Scope

3.133Considering the scale of the development, the scoping in of transport and access is supported.

3.134This should be prepared in line with IEMA Guidelines for the Environmental Assessment of Road Traffic (1993). It is also noted that it will be prepared in line with the Crossrail Environmental Statement Guidance, and Volume 8a (Traffic and Transport) of the Crossrail ES, which is considered appropriate considering the Site is an Over Site Development (OSD) located above the Woolwich Crossrail station. However, the period of time since the ES was prepared (2005) should be kept in mind throughout the assessment and it should be ensured that the assessment is robust despite this.

3.135The production of a Transport Assessment, Travel Plan, Construction and Logistics Plan, Delivery and Servicing Plan and Car Parking Management Plan is supported and appropriate references should be made to these (particularly the TA) throughout the chapter. It is noted that the TA should be prepared in line with TfL's Transport Assessment Guidance, as well as the Mayor of London's 'Healthy Streets Approach', National Planning Policy Framework (2019) and RBG requirements.

3.136The study areas and survey locations are considered appropriate.

Baseline

3.137The scope of the baseline is considered appropriate.

3.138In line with the '*Guidance in carrying out of Environmental Assessment in relation to Planning Applications for Crossrail Works (2009)*' the baseline for the assessment will be the same as that for the Crossrail ES e.g. pre Crossrail conditions. However section 3 of the Scoping Report ('Establishing Baseline Conditions') states that "it is proposed that for the purpose of the EIA and all technical assessments that the baseline scenario that will need to be considered will be that of the Site as it currently is". This is in line with the 'Site following completion of the Crossrail works but prior to the OSD' option. To clarify, the baseline used in the Transport Chapter should include the 'Site as it currently is' scenario as well as the pre-Crossrail baseline.

3.139The approach to gathering the pre-Crossrail baseline conditions is considered acceptable and it is noted that this has been agreed with the Crossrail Traffic Manager.

3.140The future baseline (i.e. the future baseline conditions without the proposed development) should be considered and this should include all committed developments.

3.141Traffic surveys should ideally be undertaken mid-week, as well as a weekend day, outside of school holidays and in the AM and PM peaks.

Assessment and Mitigation

3.142The identification of sensitive receptors has been based upon the criteria identified in Volume 8a (Traffic and Transport) of the Crossrail Environmental Statement (2005). This is in accordance with the Crossrail Guidance 'Guidance on carrying out of Environmental Assessment in relation to planning application for Crossrail Works' and so is accepted. However, the Applicant is encouraged to ensure that the passage of time between the submission of the Crossrail ES (2005) and this ES (2020) has not resulted in any significant changes to sensitive receptors.

3.143The sensitive receptors are listed as: vehicle occupants and operators, interchange users, vulnerable road users, parking and loading facilities and waterway users. This is considered comprehensive. The assessment of the likely significant effects will be based on upon the thresholds contained within Volume 8a of the Crossrail ES and is acceptable.

3.144The Proposed Development should be assessed with regard to the effects of the following criteria on all receptors: severance, delay, fear and intimidation, amenity and accidents and safety, in accordance with IEMA Guidance.

3.145The assessment scenarios that should be assessed include:

- Baseline (current and / or pre Crossrail)
- Future baseline (without development)
- Opening year / construction year

3.146Committed and cumulative schemes will be included in the background traffic growth and therefore a separate scenario which includes committed development is not considered necessary.

3.147The limitation and assumptions of the assessment have been usefully set out and highlight the potential issues.

Cumulative

3.148All committed / cumulative developments to be included in the assessment should be agreed with RBG.

3.149Cumulative effects (in-combination and effect interactions) are not set out within the transport section of the Scoping Report. It is noted that the transport chapter of the ES should include an assessment of these cumulative effects. If this is to be included in a separate 'Cumulative Effects' section it should be clearly signposted and ideally summarised in the transport chapter.

Non-Technical Summary

3.150A clear, concise Non-Technical Summary, highlighting the main issues and conclusions of the chapter should be provided with the ES.

Climate Change

Scope

3.151It is agreed that Greenhouse Gas (GHG) emissions should be scoped in. This aligns with IEMA's overarching-principles that all GHG emissions will contribute to climate change and thus might be considered significant, irrespective of whether this is an increase or decrease in emissions. It is also part of a good practice approach to EIA.

3.152The climate change chapter will focus on the calculation of GHG emissions. Climate change resilience and future adaptation will be considered within the individual technical chapters. This approach is considered appropriate, however if a topic has scoped out climate change in the assessment, it should explicitly state this within the appropriate topic chapter.

3.153A summary of likely significant and insignificant effects is provided. Whilst the conclusions drawn appear to be appropriate, the use of the >1% threshold set out by PAS 2050 should be explained in more detail.

3.154The sensitive receptors identified by the report comprise London Borough of Greenwich and wider UK GHG emissions which is considered appropriate.

Baseline

3.155It is noted that the existing Site is currently a construction compound for the Woolwich Crossrail station.

3.156The Scoping Report states that if the Site data is available from the proposed Armourers Court location, this can be used to calculate the baseline conditions. If no Site data is available, then the baseline emissions will be calculated based on typical energy use and general industry values.

3.157Given the existing use of the Site, this approach is considered appropriate. However full justification should be provided for the selection of typical/general industry values.

Assessment and Mitigation

3.158The Scoping Report confirms that the IEMA Assessing Greenhouse Gas Emissions and Evaluating their Significance (2017) guide will be followed.

3.159This approach to assessment and mitigation is considered appropriate.

Cumulative

3.160Effects of the Development in combination with other approved but unbuilt developments should be considered as part of a cumulative assessment.

Non-Technical Summary

3.161A clear, concise Non-Technical Summary, highlighting the main issues and conclusions of the chapter should be provided with the ES.

Cumulative Effects

Scope

3.162The chapter states that in-combination effects and effect interactions will be considered when assessing cumulative effects.

3.163In-combination Effects refers to effects of the interaction of the Proposed Development with other projects ('committed developments') affecting the same receptor. Other projects include foreseeable development currently being determined and development where planning consent has been granted.

3.164Effect Interactions refers to the effects of the interaction of multiple environmental effects from the Proposed Development on the same affected receptor. This is considered appropriate.

Baseline

3.165In-combination effects assessment will be entirely desk-based, and a list of committed developments will be produced using planning application documents. The final list will be agreed through consultation with RBG, with a maximum of ten developments and assessed in the ES. Table 17-1 in the chapter provides any initial list of committed developments.

3.166Effect interaction will use residual effects. This is considered acceptable.

Assessment and Mitigation

3.167A specific criterion will be used to assess in-combination effects and subsequent classification of development as 'committed development'.

3.168Effect interaction assessment will be entirely desk-based. All reported residual effects on receptors and resources from each chapter will be assessed in the interaction assessment. Initially the assessment will identify which receptors and resources have more than one residual effect on them to create a list of 'Common Receptors' to be taken forward for assessment. Any receptors that are not 'Common Receptors' will be scoped out and the residual effects for each 'Common Receptors' will be classified by each technical topic, then collated into a construction matrix and an operation matrix. Residual effects will then be assessed for their potential to result in an effect interaction and then the effect interaction will be classified with regards to the significance methodology set out in Section 3. Any moderate or higher effect interaction will be classified as a significant effect. This is an acceptable form of assessment.

Non-Technical Summary

3.169 The Scoping Report states that Volume 4 of the ES will include a Non-Technical Summary (NTS) however, there is no mention of the NTS within chapter 17, cumulative effects.

Chapter 4

Environmental Topics Scoped-Out of the EIA

Artificial Lighting

Scope

4.1 The Scoping Report provides the expected lighting environmental zones surrounding the Site which are E3 (Medium District Brightness – Suburban) and E4 (High District Brightness – Urban) environmental zones. Therefore, the effect of the Proposed Development on light spill and glare from construction and operation will not materially alter the current lighting levels.

4.2 The Scoping Report has considered the current best practice and guidance, such as the Department for Communities and Local Government's Planning Practice Guidance (6th March 2014). It includes guidance relating to 'Light Pollution' and an overview of key issues relating to artificial lighting in the planning process. It specifically aims to answer the following:

'Does a new development proposal, or major change to existing one, materially alter light levels outside the development and / or have the potential to adversely affect the use or enjoyment of nearby buildings or open spaces?'

4.3 The Proposed Development will be designed to meet statutory requirements by using low light pollution installations and considering surrounding sensitivities such as neighbouring residential buildings.

4.4 On this basis it is considered appropriate to scope Artificial Lighting out of the ES.

Archaeology

Scope

4.5 Historic England previously requested that archaeological mapping was submitted with the previous planning application, to show that the Site has been subject to significant ground disturbance due to Crossrail works and that no additional areas need to be considered further. Site plans found in Appendix B were submitted and approved by Historic England who concluded that there is no discernible on-going archaeological interest within the Site.

4.6 Based on the history of recent disturbance at the Site and the previous archaeological mapping, Archaeology has been scoped out of the ES. This is considered appropriate.

Aviation

Scope

4.7 London City Airport (LCA) is located approximately 1km south of the Site. LCA were consulted to determine potential constraints to the previous Proposed Development (Ref 13/3307/F) and the building was limited to between 32 to 35 storeys across the Site. The current Proposed Development will be 25 storeys plus the plant, which is well below the limit.

4.8 The previous Proposed Development was granted planning permission with no objections from LCA. Consultation with LCA has also been undertaken since the previous application to ensure the restrictions have not been reduced.

4.9 Protected zones have specific heights for construction crane, so the proposed height of the cranes has also been considered and the design will allow for this constraint.

4.10 Based on the Proposed Development meeting the constraints, aviation will be scoped out of the ES.

Ecology

Scope

4.11 Section 4.5 of the SR provides a summary of the Site's ecological baseline and assesses the Site to be of negligible ecological value. This assessment was informed by a Preliminary Ecological Appraisal (WSP, November 2019), which was undertaken in line with good practice guidance. The findings of this assessment are considered to be robust and appropriate given the nature of the Site and its surroundings. It is therefore considered acceptable that Ecology is scoped out of the EIA.

4.12 Ecological Enhancement Opportunities have been identified in Section 4.6 of the Preliminary Ecological Appraisal, which are in line with Local Plan policies and objectives and have the potential to deliver Biodiversity Net Gain within the Site. It is therefore recommended that some or all of these recommendations are incorporated into the Proposed Development and secured through a suitably worded planning condition.

Health and Wellbeing

Scope

4.13 The construction and operation of the Proposed Development is unlikely to cause any change to accessibility or provision of health services.

4.14 Construction may result in emissions of dust and noise however; this is temporary and will be controlled through a

Construction Environmental Management Plan (CEMP) to avoid health impacts. The Plan will ensure disruption to journeys is reduced as much as possible by including construction access and traffic measures.

4.15 In support of the application, a rapid Health Impact Assessment will be prepared and submitted. The Scoping Report also states that any health impacts can be assessed through other chapters within the ES such as Air Quality, Noise and Vibration, Socio-Economics and Transportation and Access.

4.16 On this basis it is considered appropriate to scope Health and Wellbeing out of the ES.

Major Accidents and Disasters

Scope

4.17 As a result of the nature and location of the Proposed Development, there is unlikely to be a significant risk of Major Accidents and Disasters (MA&D) that would not be accounted for within the technical chapter assessments of the ES. Mitigation measures would be included within these assessments in the technical chapters and general health and safety (H&S) obligations met.

4.18 The National Risk Register for Civil Emergencies 2017 identifies any risks and major emergencies which in the next 5 years could affect the UK. The Scoping Report has used the National Risk Register to establish any risks and major emergencies that could be relevant to the Proposed Development. Five relevant risks have been detailed:

- Flooding – The risk of flooding will be considered in the Water and Flood Risk Chapter of the ES.
- Severe Weather – The risk of the Urban Heat Island effect will be mitigated by careful design.
- Poor Air Quality – Air Quality will be assessed in the Air Quality Chapter of the ES.
- Malicious Attacks (Terrorism) – Best practice measures regarding Site security will reduce the risk and this will not require further assessment in the ES.
- Unexploded Ordnance (UXO) – The construction of Crossrail station includes below ground works and is likely to uncover any UXO that persist on the Site, so further UXO assessment for the Proposed Development is not required.

4.19 The qualitative appraisal found MA&D events are unlikely to give rise to significant effects. Therefore, MA&D will be scoped out of the ES.

Services and Utilities

Scope

4.20 New provisions or diversions services and facilities are being considered as part of the design process and suitable solutions are being agreed with the relevant providers. Therefore, no significant effects are expected.

4.21 In support of the application a separate Utilities Statement will be submitted. On this basis Services and Utilities has been scoped out of the ES.

Sustainability and Energy Statement

Scope

4.22 Separate energy and sustainability reports will be submitted in support of the application that address local, national and regional planning policy. Energy and sustainability design details will be described in the ES and used to inform other technical chapter assessments if appropriate, such as Air Quality.

4.23 On this basis Sustainability and Energy Statements have been scoped out of the ES.

Chapter 5

Conclusions

5.1 It should be noted that LUC has not been party to any discussions held between the Applicant and WSP and that this review has therefore been based only on the information submitted in the Scoping Report.

5.2 The ES will need to record all consultation undertaken and the decisions made during its preparation.

5.3 Overall, the Scoping Report meets the statutory requirements for scoping set out in Section 15(2) of the EIA Regulations, and includes sufficient detail on the approach to the identification of the baseline environment, receptors and study area. There are, however, a number of recommendations made in this review in relation to guidance, methodology and content of the ES which should be addressed during the EIA and in the ES.

5.4 Table 5.1 below contains a summary of these recommendations. This should be read in conjunction with the rest of the review report so the context of each point can be understood.

Table 5.1: Summary of Recommendations

Recommendations of this Review
<i>Regulatory Requirements</i>
Regulatory requirements are met therefore, no recommendations are given.
<i>Description of the Development</i>
EA1 The ES could also provide a more detailed up to close map with labelled streets and buildings as Figure 1-1 does not include this.
EA2 The Scoping Report could include a figure showing the current layout of the Proposed Development.
EA3 The ES should provide further details regarding the buildings massing; facades; quantum and distribution; soft and hard landscaping (including proposals for ecological enhancements); drainage; waste management; building services; and sustainability measures.
EA4 The ES should include a figure showing the layout of the Proposed Development.
EA5 There should be more detail regarding access. There is no detail regrading access for cyclists.
EA6 There are no details regarding phasing; construction methodologies; traffic management; and working hours. The future ES should include details regarding these features.
<i>Assessment Methodologies and Significance Criteria</i>
EA7 The ES should clearly justify the use of a qualitative review.

Recommendations of this Review

EA8 It is advised that the ES provides a clear list of consultees.

EA9 It is advised that the ES has a section explain any difficulties the developer has encountered.

Topics Scoped Into the ES**Air Quality**

AQ1 Local air quality management technical guidance (LAQM.TG (16)) should be adopted within the modelling methodology.

AQ2 Should detailed planning be sought for A3 property use, an odour assessment of operation upon proposed and existing receptors should be undertaken.

AQ3 For the most robust assessment, it is recommended that a diffusion tube survey is undertaken for this project. For existing monitoring data to be satisfactory, there should be at least 3 monitoring locations available for model verification and include these key locations: GW34, GW49, and the continuous analyser GN0, Burrage Grove.

AQ4 Construction traffic should be considered for quantitative assessment by comparing traffic flows against LAQM's screening criteria. Should this trigger the criteria, it should be included in a detailed dispersion model.

AQ5 All tiers of road vehicles used for construction should be Euro VI compliant.

AQ6 Consideration should be given to the Mayor of London's policy on achieving the World Health Organisation's recommended PM_{2.5} threshold of 10µg/m³.

AQ7 The energy centre assessment should consider the Environment Agency's guidance for environmental permitting⁴ if the screening criteria is met.

AQ8 Should the study meet the screening criteria the Applicant should quantitatively assess the potential for impacts upon human health and ecological receptors. For locally designated habitat sites within 2km of the proposed development, and nationally/internationally designated sites within 10 km of the proposed development.

AQ9 The Applicant should include a cumulative assessment of combined emissions from the proposed development, considering road traffic emissions and any emissions relating to proposed energy centre.

AQ10 The application will need to provide information regarding impact of emissions from the Crossrail station plant and tunnel ventilation equipment upon the proposed development.

AQ11 The Non-Technical Summary should include a summary of significant effects identified by the assessment, the mitigation measures identified to reduce them and a summary of residual impacts.

Ground Conditions

GC1 If the Applicant is proposing that embedded mitigation measures will deliver insignificant impacts, then a full description of pre-mitigation impacts and embedded mitigation measures should be provided. Impacts arising during the operational phase should be assessed.

GC2 Concerning the baseline, efforts should be made to find alternative sources of information regarding the past uses of the Site and potential contaminants arising from such uses.

GC3 It is requested that the assessor gives due weight to the potential severity of exposure to asbestos, carcinogens, munitions and explosive/asphyxiant gases when undertaking the assessment.

GC4 The assessment should include, in addition to impacts arising from soil contamination, impacts arising from UXO, armaments and explosives, asbestos, ground gases and vapours, contaminated groundwater, non-aqueous phase liquids and other ground conditions as appropriate.

⁴ www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit

Topics Scoped Into the ES
<p>GC5 The assessment should include an assessment of the cumulative effects of off-site migration of dust, gas and groundwater.</p> <p>GC 6The Non-Technical Summary should include a summary of significant effects identified by the assessment, the mitigation measures identified to reduce them and a summary of residual impacts.</p>
Noise and Vibrations
<p>NV1 The baseline conditions refer to potential sources of vibration from the railway thus, although not mentioned in the report, baseline vibration measurements should also be undertaken.</p> <p>NV2 The survey monitoring positions and methodology should be agreed with RBG EHO.</p> <p>NV3 Regard to operational vibration impacts from the Proposed Development should be included within the ES.</p> <p>NV4 A description of mitigation measures proposed as well as residual effects after mitigation is to be included in the assessment undertaken.</p> <p>NV5 The assessment should include an assessment of the cumulative effects of noise and vibration having regard to nearby committed developments in the vicinity of the Site.</p>
Water Resources and Flood Risk
<p>WRFR1 The main ES would benefit from an understanding of the flood history (if applicable) in relation to surface water and groundwater flooding in or around the development.</p> <p>WRFR2 The Applicant should undertake an analysis in the main ES to estimate the incoming potable water usage and outgoing wastewater volumes in close consultation with Thames Water, to understand the impact it may have.</p> <p>WRFR3 The water and sewerage network (as a receptor) presents an opportunity for sustainability/water reduction gains, which should be addressed within the ES.</p> <p>WRFR4 The CEMP should be a robust document that identifies the key and residual effects/risks and their mitigation to the water environment, sufficient detail should be provided in the CEMP to describe the scope of mitigation measures proposed.</p> <p>WRFR5 The Drainage strategy should consider the use of SuDS infrastructure to achieve better Greenfield runoff rates and flood storage (attenuation) to mitigate the risk of flooding elsewhere.</p> <p>WRFR6 Limitations and assumptions are detailed in the Scoping Report. They should be carried forward (and addressed if practical) into the development of the ES.</p> <p>WRFR7 The study area for the cumulative effects (such as a radius from the development Site) is not defined within Chapter 8 of the Scoping Report and clarification is required.</p> <p>WRFR8 The assessment should include an assessment of the cumulative effects of impacts of water, including groundwater, having regard to nearby committed developments in the vicinity of the Site.</p>
Socio-Economics
<p>SE1 The Applicant should ensure that all the effects identified are measured and the methodology should be clearly defined. Where qualitative assessment is used, it should clearly be justified.</p> <p>SE2 The ES should include details reading how the Proposed Development will maximise beneficial effects on the local community and environment.</p> <p>SE3 The Non-Technical Summary will need to be provided with the EIA, and significant effects upon socio-economic receptors will need to be clear for non-technical specialists.</p>
Telecommunications
<p>T1 The desktop review of published telecommunications data together with a visual assessment of the Proposed Development should be carried out in accordance with the legislation and guidance.</p>

Topics Scoped Into the ES
T2 The Non-Technical Summary will need to be provided with the EIA, and significant effects upon telecommunications receptors will need to be clear for non-technical specialists.
<i>Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution</i>
DSO1 Scoping in is largely acceptable but should also include Royal Carriage Mews (Blocks A and B).
DSO2 If an SOG assessment of Wellington Park is required, the children's play area and garden of Foundry House should be assessed as discrete amenity spaces.
DSO3 The scale of magnitude of impact stated in paragraph 3.68 should be adopted and used for the summary tables noted in paragraph 3.69.
DSO4 The cumulative assessment should include an assessment of Building 10, Royal Carriage Mews.
DSO5 The standalone internal DSO report should state all parameters used in any ADF calculation and include the summary tables noted in paragraph 3.72.
<i>Environmental Wind</i>
EW1 If, as part of the assessment, it is identified that mitigation measures are required, it could be considered, to include the testing of the mitigation measures as part of the current scope or to include it during a later stage, such as the design stage.
EW2 The Applicant proposes to use CFD (Computational Fluid Dynamics) to predict wind speeds. It is important, however, that the CFD model development follows best practice guides to ensure accuracy of the predicted results.
<i>Townscape and Visual Impact</i>
TV 1 The applicant to include a Zone of Theoretical Visibility (ZTV) as part of the TVIA to justify the choice of study area, as well as choice of assessment viewpoints.
TV2 The Applicant to provide further justification for scoping out National Character Areas (NCA) and Regional Character Areas from the townscape assessment.
TV3 The Applicant to ensure that the townscape character areas established for the purposes of undertaking the TVIA are drawn up at an appropriate scale and level of detail, following current best-practice guidance.
TV4 The Applicant to consider published townscape characterization studies within neighbouring boroughs, dependent on the results of the ZTV.
TV5 The Applicant to provide mapping of, and a rationale for the selection of, townscape character areas to be assessed.
TV6 The Applicant to further refine the representative viewpoint (RV) selection and should present these graphically as a figure/illustration.
TV7 The Applicant to agree with RBG the locations, format and whether/ how/ at what years landscape proposals will be shown within the Accurate Visual Representations (AVR).
TV8 The Applicant should ensure that the AVR methodology and the capture of photography accords with best-practice guidance, including the Landscape Institute's Technical Guidance Note 06/19 on 'Visual Representation of Development Proposals'.
TV9 The Applicant to ensure an assessment of both townscape and visual effects is undertaken during the construction phase, to align with GLVIA3.
TV10 The Applicant to ensure that 'Reversibility' is considered as part of determining the magnitude of impact, as required by the EIA Regulations and advocated within GLVIA3.
TV11 The Applicant to have regard to GLVIA3 in coming to judgements on Significance of Effect, ensuring that a reasoned narrative is provided to support all identified effects.
TV12 The Applicant to describe the measures proposed to avoid, reduce, and remedy significant adverse effects and include indication of the effectiveness of the stated measures.

Topics Scoped Into the ES
<p>TV13 The Applicant to agree with RBG the relevant cumulative schemes to be considered as part of the cumulative assessment.</p> <p>TV14 The Applicant to provide a TVIA section of the NTS, ensuring that sufficient information is provided for the non-specialist reader to understand the main environmental impacts of the proposal without reference to the main ES.</p>
<i>Built Heritage</i>
<p>BH1 The Applicant is to provide a clearer explanation of the selection criteria, including reasons for the omission of a ZTV or ZVI from the built heritage methodology</p> <p>BH2 The Applicant is to carry out a HER search, review the results to identify any built heritage assets that may experience effects and assess any that would for effects due to the scheme.</p> <p>BH3 The Applicant is to ensure any grouping used for assessment is based on a balanced assessment of all aspects of sensitivity rather than on assumptions based solely on grade and that this is clearly reasoned in accompanying text in the ES.</p> <p>BH4 The Applicant is to ensure that figures are included within the ES to allow readers to understand the location of assets in relation to the scheme. These are to include appropriate labels to allow identification of individual assets.</p> <p>BH5 The Applicant is to have regard to GPA 2 since it also lays out principles relevant to assessing the impacts of proposals and information requirements for Applicants.</p> <p>BH6 The Applicant is to amend their criteria so that all designated heritage assets are assessed as of High value in the first instance.</p> <p>BH7 The Applicant is to ensure a clearly reasoned rationale is given, based upon asset significance (incl. role of setting), so that readers can understand why heritage assets which are similarly located in relation to the scheme may experience different levels of effect.</p> <p>BH8 The Applicant is to ensure that the ES presents a description of the significance of assets under consideration, a clear articulation of the role of setting in this significance and, where relevant, in the appreciation of the asset, and then transparently explains how the presence of the scheme would affect the asset's significance or the ability to appreciate it, in line with GPA 3.</p> <p>BH9 The Applicant is to ensure that, where visualisations are used to demonstrate effects to heritage assets, it is made clear which asset/s the visualisation is being deployed to explain.</p> <p>BH10 The Applicant is to ensure that any further mitigation proposed within the ES is clearly explained in terms of how the proposed measures address effects to the significance of heritage assets</p> <p>BH11 The Applicant is to ensure that the cumulative assessment clearly details how the presence of the cumulative schemes would affect the significance of the heritage assets under discussion and that any visualisations used to demonstrate cumulative effects allow clear identification of the status of other schemes (i.e. consented, under construction, in planning).</p>
<i>Transport and Access</i>
<p>TA1 The TA should be prepared in line with TfL's Transport Assessment Guidance, as well as the Mayor of London's 'Healthy Streets Approach', National Planning Policy Framework (2019) and RBG requirements.</p> <p>TA2 The future baseline (i.e. the future baseline conditions without the proposed development) should be considered and this should include all committed developments.</p> <p>TA3 Traffic surveys should ideally be undertaken mid-week, as well as a weekend day, outside of school holidays and in the AM and PM peaks.</p> <p>TA4 Applicant is encouraged to ensure that the passage of time between the submission of the Crossrail ES (2005) and this ES (2020) has not resulted in any significant changes to sensitive receptors</p> <p>TA5 All committed / cumulative developments to be included in the assessment should be agreed with RBG.</p> <p>TA 6 A clear, concise Non-Technical Summary, highlighting the main issues and conclusions of the chapter should be provided with the ES.</p>

Topics Scoped Into the ES
<i>Climate Change</i>
<p>CC1 Climate change resilience and future adaptation will be considered within the individual technical chapters. If a topic has scoped out climate change in the assessment, it should explicitly state this within the appropriate topic chapter.</p> <p>CC2 A summary of likely significant and insignificant effects is provided. Whilst the conclusions drawn appear to be appropriate, the justification should be explained in more detail including a full explanation of the >1% threshold set out by PAS 2050.</p> <p>CC3 baseline emissions will be calculated based on typical energy use and general industry values, full justification should be provided for the selection of typical/general industry values.</p> <p>CC4 Effects of the Development in combination with other approved but unbuilt developments should be considered as part of a cumulative assessment.</p> <p>CC5 A clear, concise Non-Technical Summary, highlighting the main issues and conclusions of the chapter should be provided with the ES.</p>
<i>Cumulative Effects</i>
<p>CE1 The Non-Technical Summary will need to be provided with the EIA, and the significant cumulative effects will need to be clear for non-technical specialists.</p>

Topics Scoped Out of the ES
<i>Artificial Lighting (Scoping Out is acceptable)</i>
<p>The Scoping Out of Artificial Lighting as the Scoping Report has used best practice and guidance and the Proposed Development will be designed to meet statutory requirements by using low light pollution installations and considering surrounding sensitivities.</p>
<i>Archaeology (Scoping Out is acceptable)</i>
<p>The Scoping Out of Archaeology is considered acceptable subject to clarification on consultation with GLAAS and the extent of Crossrail ground disturbance being demonstrated.</p>
<i>Aviation (Scoping Out is acceptable)</i>
<p>The Scoping Out of Aviation is considered acceptable as London City Airport have been consulted and restrictions regarding the Proposed Developments design have been met.</p>
<i>Ecology (Scoping Out is acceptable)</i>
<p>The Scoping Out of Ecology is considered acceptable as a Preliminary Ecological Appraisal (WSP, November 2019) was undertaken in line with good practice guidance and is considered robust and appropriate.</p>
<i>Health and Wellbeing (Scoping Out is acceptable)</i>
<p>The Scoping Out of Health and Wellbeing is considered acceptable as a rapid Health Impact Assessment and Construction Environmental Management Plan (CEMP) will be submitted in support of the application.</p>
<i>Major Accidents and Disasters (Scoping Out is acceptable)</i>
<p>The Scoping Out of Major Accidents and Disasters (MA&D) is considered acceptable as an appropriate and robust qualitative appraisal found MA&D events are unlikely to give rise to significant effects.</p>

Topics Scoped Out of the ES
Services and Utilities (<i>Scoping Out is acceptable</i>)
The Scoping Out of Services and Utilities is considered appropriate as new provisions or diversions of services and facilities is being considered.
Sustainability and Energy Statements (<i>Scoping Out is acceptable</i>)
The Scoping Out of Sustainability and Energy Statements is considered acceptable as separate energy and sustainability reports will be submitted in support of the application.