



Kensington Forum

QUEENSGATE
INVESTMENTS

Rockwell



TRIUM

Kensington Forum Hotel – London

ENVIRONMENTAL STATEMENT ADDENDUM | JULY 2020
ES ADDENDUM MAIN REPORT | VOLUME 1

Table of Contents

Volume 1: ES Addendum Main Report

Chapter 1: Introduction and ES Addendum Approach

Chapter 6: Socio Economics (Addendum Chapter)

Chapter 7: Traffic and Transport (Statement of Conformity)

Chapter 8: Noise and Vibration (Statement of Conformity)

Chapter 9: Air Quality (Statement of Conformity)

Chapter 10: Daylight, Sunlight, Overshadowing and Solar Glare (Statement of Conformity)

Chapter 11: Wind Microclimate (Statement of Conformity)

Chapter 12: Conclusions

Volume 2: Townscape, Visual and Heritage Impact Assessment Addendum (TVHIAA)

Townscape, Visual and Heritage Impact Assessment Addendum (TVHIAA)

Volume 3: Technical Appendices

Appendix: Introduction and ES Addendum Approach

Appendix: Traffic and Transport (Replacement Appendix)

Chapter 1: Introduction and ES Addendum Approach

INTRODUCTION

- 1.1 This Environmental Statement Addendum ('ES Addendum') has been prepared on behalf of Queensgate Bow UK Holdco Limited ('the Applicant'), to accompany a post submission updated suite of planning documents, for the Greater London Authority ('GLA') Stage 3 Hearing on the hotel led scheme (the 'Proposed Development') on land to the south of Cromwell Road ('the site').
- 1.2 The ES Addendum has been undertaken in accordance with the statutory procedures set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017¹ ('the EIA Regulations').
- 1.3 The site was subject to a detailed planning application (PP/18/03461), which was submitted to the Royal Borough of Kensington and Chelsea ('RBKC') on 18 June 2018.
- 1.4 The detailed planning application for the Proposed Development submitted to the RBKC in June 2018 was for the:
'Comprehensive redevelopment and erection of a part 30, part 22 and part 7 storey building comprising hotel bedrooms and serviced apartments (Class C1) with ancillary bar, restaurants, conferencing and dining areas, leisure facilities and back of house areas; residential accommodation (Class C3); with associated basement, energy centre, plant, car parking, cycle parking, refuse stores, servicing areas; associated highway works and creation of new publicly accessible open space with associated hard and soft landscaping.'
- 1.5 On 25 October 2018, at the RBKC October Planning Committee, the RBKC resolved to refuse planning permission for the Proposed Development.
- 1.6 On 5 November 2018, the Mayor of London directed RBKC (under the powers of Section 2A of the Town & Country Planning Act (as amended)²) that he would act as the local planning authority for determining this planning application, and thereby 'calling in' the planning application. Following the planning application being called in by the Mayor of London, a number of design changes and amendments were made to the scheme and presented within the 2019 ES Addendum. These amendments comprised:
 - Increase of residential units by 16, from 46 to 62 units;
 - All residential units became affordable i.e. social rented, therefore a total of 62 affordable units were proposed;
 - An additional two storeys on top of the podium were created to accommodate the additional residential units;
 - Internal reconfigurations to the residential dwellings;
 - The residential garden and terrace previously on level 7 was moved up by two storeys, to be located on level 9. This area was amended to include an increase in playspace to a total of 530m² playspace provided;
 - The bay windows on the southern-most façade of the podium were expanded out by 750mm;
 - A number of balconies were proposed on the podium's southern façade and set-back roof terraces at the upper levels along the podium's south western edges;
 - Wind mitigation measures tested as part of the June 2018 ES were fully integrated into the Proposed Amendments;
 - The ground floor residential lobbies were consolidated into one entrance space and the cycle store was increased in size; and
 - The bike store and refuse store in the basement level B1 was amended, with the separate refuse stores being consolidated into a single large space to accommodate three additional bins, with the bike stores also increasing in size so that 34 additional cycle parking spaces are accommodated across all residential bike stores. No further amendments to the basements are proposed.
- 1.7 These amendments were all predominantly focused around increasing the number of residential units proposed, and the provision of all units being affordable rent. These proposed amendments were incorporated

into the design of the scheme, for part of the Proposed Development, and the implications of these amendments were considered within an ES Addendum (April 2019 ES Addendum) submitted to the GLA in April 2019.

- 1.8 The planning application for the Proposed Development, including the April 2019 proposed amendments, comprise:
"Comprehensive redevelopment and erection of a part 30, part 22 and part 9 storey building comprising hotel bedrooms and serviced apartments (Class C1) with ancillary bar, restaurants, conferencing and dining areas, leisure facilities and back of house areas; residential accommodation (Class C3); with associated basement, energy centre, plant, car parking, cycle parking, refuse stores, servicing areas; associated highways works and creation of new publicly accessible open space with associated hard and soft landscaping".
- 1.9 The planning application was approved by the Mayor of London on 21st June 2019. Since the decision to approve the planning application was taken by the Mayor, the RBKC initiated a Judicial Review ('JR') challenge of the decision. The grounds for challenge were limited to issues associated with the procedure followed in respect of the Secretary of State's ability to Call In the application. The RBKC did not raise any legal issues in relation to any aspect of the Stage 3 Hearing Report. Prior to a formal JR hearing, the GLA consented to judgement and the decision was quashed.
- 1.10 As a result, there is a procedural requirement for a second Stage 3 Hearing and redetermination by the Mayor or Deputy Mayor. The Applicant is requested to update the submission to take account of any recent changes to adopted planning policy and emerging planning policy.
- 1.11 The Proposed Development remains as submitted to the GLA in April 2019. It has not changed since then.
- 1.12 This 2020 ES Addendum should be read in conjunction with the June 2018 Environmental Statement and April 2019 Environmental Statement Addendum submitted to RBKC. Together these documents constitute the Environmental Impact Assessment for the Proposed Development.

PROPOSED DEVELOPMENT

- 1.13 The Proposed Development remains consistent with that presented in the April 2019 ES Addendum (and June 2018 ES where not superseded by the April 2019 ES Addendum) and is summarised below in **Table 1.1**, **Table 1.2** and shown in **Figure 1.1**.

Table 1.1 Proposed Land Uses and Amount of Development

Land Use (Use Class)	GEA (m ²)	GIA (m ²)
Hotel Accommodation (C1)	21,531	20,282
Serviced Apartments Accommodation (C1)	13,026	12,329
Hotel Ancillary Spaces (C1)	40,250	38,764
Residential Accommodation (C3)	5,282	5,171
Residential Ancillary Spaces (C3)	2,346	2,264

Table 1.2 Number of Units by Residential Tenure

Tenure	Total Unit no.	% of total residential area
Private	0	0%
Affordable	62	100%
Total	62	100%

- 1.14 There is a total of 62 affordable units as part of the Proposed Development, with a breakdown of:
 - 6 - 1 Bed Studio apartments;
 - 19 - 1 Bed (2 people) apartments;
 - 26 - 2 Bed (4 people) apartments; and
 - 11 - 3 Bed (4-6 people) apartments.

¹ The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018

² The Stationary Office. Town and Country Planning Act 1990. TSO.

Figure 1.1 Proposed Development



APPROACH TO THE ES ADDENDUM

- 1.15 This ES Addendum builds on the analysis and assessments presented in the June 2018 ES and April 2019 ES Addendum to provide information necessary to assess the likely significant effects of the Proposed Development.
- 1.16 While considering the Proposed Development, the assessment presented in this ES Addendum is focused on updating the June 2018 ES, taking into account the April 2019 ES Addendum, to consider any changes to the baseline, planning policy or guidance, assessment methodologies, and cumulative schemes for consideration that may have occurred during the period of time since the previous assessments were undertaken. Any such changes which have the potential to impact the conclusions of the June 2018 ES and April 2019 ES Addendum have been identified. Where deemed necessary, updated information and / or assessments have been provided. All elements of the June 2018 ES or 2019 ES Addendum not covered in this ES Addendum are considered to remain valid and unchanged.
- 1.17 Given there are no proposed amendments to the Proposed Development, there are no material changes to the demolition and construction programme, anticipated works, site access and egress etc., with the demolition and construction information presented in the June 2018 ES and April 2019 ES Addendum remaining valid..
- 1.18 For ease of reading and reference, the technical chapters within this ES Addendum follow the same structure, format and chapter order presented within the June 2018 ES, with the same chapter volume and chapter numbers used throughout.
- 1.19 The EIA specialists who contributed to the June 2018 ES and April 2019 ES Addendum have reviewed their assessments and the potential for any materially new or different environmental effects or changes to the conclusions of the assessments.
- 1.20 Where it has been considered that no material or significant changes to an assessment or the conclusions of an ES Technical Chapter would occur, a statement has been provided confirming this for the relevant assessment within this ES Addendum. The whole assessment has been taken into consideration within the statements of conformity. This has been undertaken for:

- ES Volume 1, Chapter 7: Traffic and Transport;
- ES Volume 1, Chapter 8: Noise and Vibration;
- ES Volume 1, Chapter 9: Air Quality;
- ES Volume 1, Chapter 10: Daylight, Sunlight, Overshadowing and Solar Glare; and
- ES Volume 1, Chapter 11: Wind Microclimate.

1.21 Where changes are considered to impact on the assessment and potentially affect the reported environmental effects and conclusions of the ES Chapter, updates to the assessment has been undertaken where relevant for the Proposed Development. This has been undertaken for:

- ES Volume 1 Chapter 6: Socio Economics.

1.22 The Townscape, Visual and Heritage Impact Assessment (TVHIA) presented in the June 2018 ES and the updated TVHIA Addendum prepared in April 2019 has been reviewed along with all Accurate Visual Representations (AVRs) of the Proposed Development. Where it has been considered that the additional cumulative schemes as presented in Table 1.3 would be potentially visible, updated AVRs have been undertaken and presented in the form of a TVHIA Addendum (ES Volume 2, TVHIA Addendum).

1.23 In addition to a review of Volumes 1 and 2 of the ES, the Technical Appendices (Volume 3) have also been taken into consideration, and, where relevant, appendices have been updated. Given that no changes are proposed to the Proposed Development a majority of these appendices remain valid for this ES Addendum, however, for completeness where it has been considered necessary to update appendices this has been undertaken.

1.24 A chapter providing an overview of the conclusions of the ES Addendum has been provided, and includes updates to Chapter 12 Effect Interactions, Chapter 13: Likely Significant Effects, and Chapter 14: Mitigation & Monitoring Schedule of the June 2018 ES and April 2019 Addendum where relevant.

1.25 The ES Addendum therefore comprises:

ES Volume 1:

- Chapter 1: Introduction and ES Addendum Approach
- Chapter 6: Socio-Economics (Addendum Chapter)
- Chapter 7: Traffic and Transport (Statement of Conformity)
- Chapter 8: Noise and Vibration (Statement of Conformity)
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- Chapter 11: Wind Microclimate (Statement of Conformity)
- Chapter 12: Conclusions

Volume 2: Townscape, Visual and Heritage Impact Assessment Addendum (TVHIAA)

Volume 3: Technical Appendices

Appendix Introduction and ES Addendum Approach

- Annex 1 Flood Risk Assessment

- Annex 2 Ecological Appraisal

Appendix Traffic and Transport

- Annex 1 Transport Assessment Addendum

Non-Technical Summary

1.26 A separate document is presented, referred to as the Non-Technical Summary (NTS), which provides a concise summary of the ES and ES Addendums written in non-technical language. The NTS presents a summary of the Proposed Development and the likely significant environmental effects.

Planning Context

- 1.27 This ES Addendum considers relevant legislation and relevant national, regional and local planning policy guidance and considers any updates to planning policy since the June 2018 ES and April 2019 ES Addendum.
- 1.28 While the June 2018 ES considered the Draft Revised NPPF³, this has now been published and the ES Addendum takes account of the 2019 updated NPPF⁴, which sets out the Government's economic, environmental and social planning policies for England. The policies contained within the NPPF articulate the Government's vision of sustainable development, which are intended to be interpreted at a local level, to meet the requirements of local aspirations.
- 1.29 Since the June 2018 ES and April 2019 ES Addendum, the following changes to regional and local policy have occurred:
 - **The Draft London Plan:** An Intend to Publish version of the plan was issued to the Secretary of State on the 9th December 2019. Following the issue of the Draft London Plan, the Secretary of State issued a response and directions on the 13th March 2020. The Mayor is now considering the Secretary of State's response and is undertaking the statutory steps in order to finalise the Draft London Plan, as outlined in the Mayor's response to the Secretary of State on the 24th April^{5,6}. It is noted this is still a draft document and therefore sufficient weight has been given to this planning policy document where deemed appropriate based on professional judgement, and has been considered throughout this ES Addendum; and
 - **The RBKC Local Plan 2019:** The RBKC adopted their new Local Plan in September 2019⁷, with the adopted policies replacing parts of the Consolidated Local Plan (2015) and the remaining saved policies within the borough's Unitary Development Plan (2007). The newly adopted Local Plan has been taken into consideration in this ES Addendum.
- 1.30 RBKC also adopted a new Planning Contributions Supplementary Planning Document⁸ ('SPD') in September 2019 and a Community Housing SPD⁹ in June 2020. These SPD's have been taken into consideration where relevant.

Climate Change

- 1.31 Since the 2018 June ES, the Met Office have published new and updated future climate projections. The new data, Met Office UKCP18 Projections, consider the climate effects arising from a series of 'Representative Concentration Pathways' (RCP) emissions scenarios.
- 1.32 In general, the predicted future climate change, and effects on developments, does not change from that presented in the June 2018 ES. There will be: a move towards warmer, wetter winters and hotter, drier summers; the probability of wet summers reduces only slightly; trends indicate drier summers, with reductions in rainfall largest in the south of England; cloud cover is expected to reduce slightly; and any increases in wind speeds are modest with a slight increase in likelihood of storms.
- 1.33 There is no significant change to the climate change predictions presented in the June 2018 ES from the new UKCP18 data and therefore the climate change assessments undertaken for the June 2018 ES remain valid.

Cumulative Schemes

- 1.34 As part of this ES Addendum, the RBKC has been consulted and two additional cumulative schemes have been assessed within this ES Addendum. These schemes are presented in **Table 1.3** below and assessed as relevant within this ES Addendum's Technical Chapters.

Table 1.3 Additional Cumulative Schemes

Development	Planning Ref	Description of Development
Heythorp College	PP/18/05313	Reinstatement of three townhouses (Class C3), (part of 23 and 24 Kensington Square); refurbishment of college building (part of 23 Kensington Square) and use as an extra care facility (Class C2). Demolition of all other buildings on site. Erection of deck over adjacent London Underground line and construction of 5 buildings (ranging between 1 and 8 storeys in height) for use as an extra care facility including units.

³ DCLG, 2018; 'Draft Revised National Planning Policy Framework, March 2018
⁴ DCLG, 2019; National Planning Policy Framework, 2019.
⁵ GLA, 2019; 'The Draft London Plan – Intend to Publish'
⁶ Mayor of London, April 2020, Letter to Secretary of State

Development	Planning Ref	Description of Development
100 West Cromwell Road	PP/19/00781	communal facilities and services areas, community hall and on-site affordable housing and associated access parking, servicing and landscaping. On 5 June 2020 the Mayor of London granted planning permission for the amended redevelopment as below: Partial demolition and reconfiguration of existing structures and erection of eight buildings up to a maximum of 29 storeys (above podium) to provide 462 residential units (C3) including the provision of 186 affordable housing units, a public leisure centre including a gym and pool (D1/D2), commercial/retail space (B1, flexible B1/A1/A3 and B1/D1/D2), alongside hard and soft landscaping, car parking and cycle spaces, public realm improvements and all ancillary and associated works including servicing, storage, plant and equipment.'

ES ADDENDUM AVAILABILITY AND COMMENTS

- 1.35 The ES Addendum is available for viewing by the public at the GLA, City Hall and is viewable online at the GLA's Planning Application Website.
- 1.36 Comments on the Planning Application should be forwarded to the GLA at the following address:
 Greater London Authority
 City Hall, The Queen's Walk
 London, SE1 2AA
- 1.37 Electronic Copies of the NTS are available free of charge. To request a copy please contact:
 Trium Environmental Consulting LLP
hello@triumenv.co.uk
 0203 887 7118

⁷ RBKC, 2019; Local Plan, September 2019
⁸ RBKC, 2019; Planning Contributions Supplementary Planning Guidance, September 2019
⁹ RBKC, 2020; Community Housing Supplementary Planning Guidance, June 2020

Chapter 6: Socio-Economics (Addendum Chapter)

INTRODUCTION

- 6.1 The review of the Socio-Economic assessment has been undertaken by Quod, the authors of the chapter in the June 2018 ES and the April 2019 ES Addendum. The April 2019 ES Addendum Chapter provided a complete updated assessment of the socio-economic effects and therefore effectively replaced the June 2018 ES Chapter,

LEGISLATION, PLANNING POLICY AND GUIDANCE

- 6.2 Since the submission of the June 2018 ES and April 2019 ES Addendum, a revised version of the National Planning Policy Framework¹ (2019) has been published. This has been reviewed and is not considered to affect the socio-economic assessment.
- 6.3 The Intend to Publish ('ItP') New London Plan² was published in December 2019, which sets RBKC a minimum target of 4,480 new homes to be delivered by 2028/29. This compares to the London Plan 2016 which set RBKC a higher ten-year housing target of 7,330 homes.
- 6.4 RBKC adopted a new Local Plan in September 2019³. Policies of relevance to the socio-economic assessment include:
- Policy CP1 'Core Policy: Quanta of Development' and Policy SH1 'Increasing Housing Supply' applies the adopted London Plan (2016) as the basis of setting an annual housing target of 733 net additional homes per year – the assessment on housing delivery below both considered this housing target and the ItP New London Plan's housing target;
 - Policy CR5 'Parks, Gardens, Open Spaces and Waterways' requires all major developments to provide on-site external playspace, including for under-fives, based on expected child occupancy – the assessment of demand for playspace below considers this policy requirement; and
 - Policy C1 'Infrastructure and Planning Contributions' states that where needed to make development acceptable in planning terms S106 requirements may be sought in relation to playspace, provision of community, social and health facilities (including schools) and economic initiatives to support local employment and training.
- 6.5 RBKC also adopted a new Planning Contributions Supplementary Planning Document (SPD)⁴ alongside their new Local Plan, which supersedes the Planning Obligations SPD (2010)⁵ referred to in the April 2019 ES Addendum. This updated SPD has implications for the assessment in relation to child yield and education contributions which are detailed below.

ASSESSMENT METHODOLOGY

- 6.6 The April 2019 ES Addendum calculated population using the following methodologies:
- Total population using the 'Quod Model' which is based on Census data⁶ and CORE Lettings data⁷;
 - Child yield to assess demand for school places using the child yield methodology set out in RBKC's Planning Obligations SPD (2010)⁵ (hereafter "the RBKC Model"). As noted above RBKC's Planning Contributions SPD (2019)⁴ supersedes this document – the new SPD does not include a child yield methodology; and
 - Child yield to assess playspace demand using the GLA's SPG on Play and Informal Recreation child yield methodology (hereafter "the GLA SPG Model 2012").
- 6.7 The GLA has since introduced a new population yield calculator⁸ (hereafter "the GLA Population Yield Calculator 2019"). This new calculator has been used to estimate the Proposed Development's total population and child yield for both school place demand⁹ and playspace demand. The population yield estimate is based

¹ DCLG, 2019; 'National Planning Policy Framework'

² GLA, 2019. The London Plan – Intend to Publish, December 2019.

³ RBKC, 2019. Local Plan, September 2019.

⁴ RBKC, 2019. Planning Contributions Supplementary Planning Document, September 2019.

⁵ RBKC, 2010. Planning Obligations Supplementary Planning Document.

on a PTAL of 5-6 and geographic aggregation of Inner London, in line with the guidance provided in the calculator.

- 6.8 Outputs of the new GLA Population Yield Calculator 2019 are presented alongside outputs from the methodologies applied in the April 2019 ES Addendum for comparison.

- 6.9 All other assessment methodology set out within the April 2019 ES Addendum remains valid.

BASELINE CONDITIONS

- 6.10 Since the submission of the April 2019 ES Addendum the baseline has evolved with respect to education and healthcare facilities. The latest available data has been used to update the baseline with respect to education and healthcare facilities, as set out below.

- 6.11 All other baseline set out in the April 2019 ES Addendum Socio-Economic chapter remains valid.

Education Facilities

- 6.12 The latest Annual Schools Census data (2020)¹⁰ has been used to update primary and secondary school capacities.

Primary Schools

- 6.13 Based on the Annual Schools Census data (2020) and Local Education Authority (RBKC) published admission numbers ('PANs'), the current combined capacity at state-funded primary schools within 1km of the site is approximately 6% or 91 places – slightly higher than the 5% surplus capacity reported in the April 2019 ES Addendum.

- 6.14 **Table 6.1** sets out the amended existing capacity of the primary schools within 1km of the site for the 2019/20 school year. The location of these primary schools are illustrated in **Figure 6.3** of the April 2019 ES Addendum and remain valid.

Table 6.1 Primary School Capacity 2019/20

Map Ref.	School Name	Number on Roll	Capacity	Surplus Places (no.)	Surplus Capacity (%)
1	Bousfield Primary School	417	420	3	1%
2	St Barnabas and St Philip's CofE Primary School	200	210	10	5%
3	St Mary Abbots CofE Primary School	198	210	12	6%
4	St Cuthbert with St Matthias CofE Primary School	166	210	44	21%
5	Servite RC Primary School	203	210	7	3%
6	Our Lady of Victories RC Primary School	195	210	15	7%
Total		1,379	1,470	91	6%

Secondary Schools

- 6.15 The combined surplus capacity of the six state-funded secondary schools within RBKC for the 2019/20 school year is approximately 2% or 112 places – slightly lower than the 5% surplus capacity reported in the April 2019 ES Addendum.

- 6.16 Council's generally seeks to maintain a vacancy rate of 5% to accommodate mid-year admissions and facilitate parent choice¹¹, meaning that, at 2%, secondary schools within the borough can be considered to currently have no surplus capacity.

⁶ Office for National Statistics, 2011. Census.

⁷ DCLG, 2007-2012. Social housing lettings in England (CORE Lettings Data).

⁸ GLA, 2019. GLA Population Yield Calculator (v3.2).

⁹ Age brackets have been adjusted to align with primary and secondary educational phases.

¹⁰ Department for Education (2020). Schools, Pupils and their Characteristics. (Annual School Census Data, 2020)

¹¹ National Audit Office – Department for Education. (2013). Capital funding for new school places.

6.17 **Table 6.2** sets out the amended secondary school capacities. The location of these secondary schools are illustrated in **Figure 6.4** of the April 2019 ES Addendum and remain valid.

Table 6.2 Secondary School Capacity 2019/20

Map Ref.	School Name	Number on Roll	Capacity	Surplus Places (no.)	Surplus Capacity (%)
1	Saint Thomas More Language College	637	600	0	0%
2	All Saints Catholic College (formerly called Sion-Manning Catholic Girls' School)	527	600	73	12%
3	Chelsea Academy	889	900	11	1%
4	Holland Park School	1172	1200	28	2%
5	Kensington Aldridge Academy*	933	900	0	0%
6	The Cardinal Vaughan Memorial RC School	627	620	0	0%
Total		4,785	4,820	112	2%

Healthcare Facilities

6.18 In respect of healthcare facilities, the latest NHS data¹² has been used to update GP capacity – the 12 GP surgeries within 1km of the site have an average of 1,700 registered patients per FTE GP – which compares to an average of 1,163 registered patients per GP (headcount) reported in the April 2019 ES Addendum. The number of registered patients per GP therefore, remains below the HUDU suggested benchmark of 1,800 patients per FTE GP¹³.

RECEPTORS AND RECEPTOR SENSITIVITY

6.19 No additional or new receptors have been identified.

6.20 Taking into account the baseline updates set out above, secondary schools are now considered a high sensitivity receptor as opposed to a medium sensitivity receptor as per the April 2019 ES Addendum. All other receptors and receptor sensitivities described in the April 2019 ES Addendum remain valid and unchanged.

POTENTIAL EFFECTS

6.21 The assessment of potential effects has been amended to reflect the policy and baseline updates identified above.

Demolition and Construction

6.22 The potential demolition and construction socio-economic impacts and likely effects that could arise from the Proposed Development, as set out in the April 2019 ES Addendum, remain valid.

Completed Development

Housing Delivery

6.23 The April 2019 ES Addendum assessed housing delivery against the London Plan 2016 ten-year housing target for RBKC (7,330 new homes) and identified that the Proposed Development would contribute 0.8% towards this target. This assessment remains valid.

6.24 The ItP London Plan 2019 proposes to reduce RBKC's ten-year housing target to 4,480 new homes – the Proposed Development would contribute 1.4% towards this target (which is also considered a low magnitude impact).

6.25 The potential effect of the Proposed Development on housing delivery identified in the April 2019 ES Addendum remains valid – direct, permanent, **Minor Beneficial** (not significant) at the local and borough level; and **Negligible** (not significant) at the regional level.

Population

6.26 The estimated future population of the Proposed Development calculated using the GLA Population Yield Calculator 2019 is set out in **Table 6.3**, alongside the calculated figures set out within the April 2019 ES Addendum which applied different methodologies. The difference in the resulting yields between the old methodologies and the new GLA Population Yield Calculator is not significantly different. The total population is expected to have 16 more residents.

Table 6.3 Proposed Development Population

Variable	Number – 2019 ES Addendum	Number - GLA Population Yield Calculator 2019
Number of Homes	62	62
Total Population	134 (Quod Model)	150
Primary School Children (4-10 years)	20 (RBKC Model)	21
Secondary School Children (11-15 years)	14 (RBKC Model)	10

Demand for Social Infrastructure

Primary Education

6.27 Using the GLA Population Yield Calculator 2019, amending the age profile to be in line with primary school age (4-10 years), it is estimated that the Proposed Development would result in demand for 21 primary school places, which compares to 20 primary places identified within the April 2019 ES Addendum.

6.28 As set out in the updated baseline, capacity within local primary schools has increased slightly from 5% to 6%. Therefore, on balance, the potential effect of the Proposed Development on primary education would remain as per the April 2019 ES Addendum – **Negligible** at all spatial scales.

Secondary Education

6.29 Using the GLA Population Yield Calculator 2019, amending the age profile to be in line with secondary school age (11-15 years), it is estimated that the Proposed Development would result in demand for 10 secondary school places, which compares to 14 secondary places identified within the April 2019 ES Addendum.

6.30 As set out in the updated baseline, surplus secondary school capacity has reduced from 5% to 2% since the April 2019 ES Addendum, and as such secondary schools are now considered a high sensitivity receptor. Therefore, it is considered that the Proposed Development would have a direct, permanent, **Minor Adverse** effect (not significant) at the Borough level. This compares to the April 2019 ES Addendum which identified a **Negligible** effect at all spatial scales.

Healthcare

6.31 Based on the GLA Population Yield Calculator 2019, the Proposed Development would accommodate 150 residents which would result in the need for the equivalent of 0.1 Full Time GPs, which remains as identified in the April 2019 ES Addendum.

6.32 As set out in the updated baseline, the average patient list size of GPs within 1km of the site is still below the HUDU recommended benchmark, therefore the potential effect of the Proposed Development on healthcare remains as identified in the April 2019 ES Addendum – **Negligible** at all spatial scales.

Playspace

6.33 **Table 6.4** sets out the Proposed Development's playspace requirement based on both the new GLA Population Yield Calculator 2019, and the GLA SPG Model 2012 as set out in the April 2019 ES Addendum.

Table 6.4 Proposed Development Playspace Demand and Provision

¹² NHS Digital, 2020. General Practice Workforce Data Report, March 2020. Available Online: <https://digital.nhs.uk/data-and-information/data-tools-and-services/data-services/general-practice-data-hub/workforce> [Access: 9 July 2020].

¹³ Healthy Urban Development Unit. (2009). HUDU Model.

Age Profile	GLA SPG Model 2012 Requirement	New GLA Model 2019 Requirement	Proposed Development Provision	Typology
Under 5 years	270m ²	242m ²	440m ²	Doorstep/ Local Playable Space
5 – 11 years	160m ²	183m ²		
12 – 18 years	90m ²	123m ²	100m ²	Neighbourhood Playable Space
Total	520m²	548m²	540m²	

- 6.34 In line with the new RBKC Local Plan Policy CR5 ‘Parks, Gardens, Open Spaces and Waterways’ the Proposed Development meets the playspace needs for children under five years on-site.
- 6.35 The overall demand for playspace (based on the new GLA Population Yield Calculator 2019) is for children up to 18 years is a total of 548m² of playspace. The Proposed Development will deliver 540m² of playspace, which equates to 98% of the total demand. This is a marginal level of under provision against the new child yield methodology.
- 6.36 It is therefore considered that the potential effect of the Proposed Development is **Negligible** at all spatial scales (not significant). This is a slight change from the April 2019 ES Addendum which found the potential effect to be **Minor Beneficial** at the site and local level (not significant).

All Other Effects

- 6.37 All other potential effects identified within the April 2019 ES Addendum including employment and additional spending remain valid.

MITIGATION AND RESIDUAL EFFECTS

- 6.38 The April 2019 ES Addendum Socio-Economic chapter identified a **Negligible** effect on secondary education. The assessment of the Proposed Development against the updated baseline has identified a **Minor Adverse** (not significant) effect. RBKC’s new Planning Obligations SPD⁴ does not include financial contributions for education to be secured through S106 agreements. Financial contributions towards provision of additional secondary capacity if deemed necessary by the Council could be secured through use of CIL in line with Regulation 59 of the CIL Regulations and the National Planning Policy Framework (Paragraph: 001 Reference ID: 25-001-20190901). Following implementation of the proposed additional mitigation, the identified minor adverse effect on secondary education would be **Negligible** at all spatial scales.
- 6.39 The remainder of the mitigation and residual effects section of the April 2019 ES Addendum Socio-Economic chapter remains valid.

LIKELY SIGNIFICANT EFFECTS

- 6.40 There are no changes to the residual significant effects, with no significant adverse effects, and a significant beneficial effect from additional spending by new residents, employees and guests accommodated by the Proposed Development (**Moderate Beneficial** effect at the local level).

CLIMATE CHANGE

- 6.41 The April 2019 ES Addendum was based on the UKPC09 climate projections, the latest UKPC18 climate projections have been reviewed and are not considered to have a material effect upon the sensitive receptors within the socio-economic assessment with respect to the Proposed Development. The April 2019 ES Addendum identified that potential effects related to climate change are not relevant to the assessment of socio-economic effects – this remains valid.

CUMULATIVE EFFECTS ASSESSMENT

- 6.42 Two additional cumulative schemes have been identified since submission of the April 2019 ES Addendum. These two cumulative schemes have been reviewed in the context of socio-economic impacts which are outlined below:

- Heythorp College: PP/18/05313 will result in the reinstatement of three townhouses and delivery of 142 extra care units – the application’s documentation estimates 160 jobs will be associated with operation of the scheme; and
- 100 West Cromwell Road: PP/19/00781 supersedes application PP/11/00107 assessed in the April 2019 ES Addendum. The amended scheme increases the number of residential units from 293 to 427, and reduces the number of projected jobs from 210 to 160 FTE according to the application documentation.

- 6.43 The April 2019 ES Addendum identified that the cumulative schemes and Proposed Development would generate up to 13,000 jobs. In the context of the scale of cumulative employment generation, the inclusion of the two additional cumulative schemes would not have a material impact, therefore the effect in relation to employment creation remains valid - direct, permanent, Major Beneficial at the local, Minor Beneficial at the borough level and Minor Beneficial at the regional level.
- 6.44 The April 2019 ES Addendum identified that the cumulative schemes and Proposed Development would bring forward approximately 10,500 residential units – therefore in the context of the scale of cumulative housing delivery, the inclusion of the two additional cumulative schemes (one for older persons housing), would not have a material impact; the effect in relation to housing delivery remains valid - direct, permanent, Major Beneficial at the local and borough level and Minor Beneficial at the regional level.
- 6.45 All other cumulative effects identified in the April 2019 ES Addendum Socio-Economic chapter remain unchanged and valid.

Chapter 7: Traffic and Transport (Statement of Conformity)

INTRODUCTION

7.1 The review of the Traffic and Transport assessment has been undertaken by WSP, the authors of the chapter in the June 2018 ES and the April 2019 ES Addendum. The review has been carried out in the context of the previously submitted Transport Assessment (TA) June 2018 and subsequent Transport Assessment Addendum.

LEGISLATION, PLANNING POLICY AND GUIDANCE

7.2 There have been updates to relevant legislation, national, regional and local planning policy, and guidance, since the submission of the June 2018 ES and April 2019 ES Addendum relevant to the transport assessment. The newly published documents are:

- The National Planning Policy Framework (2019)¹;
- The 'Intend to Publish' version of the new London Plan (2019)²;
- The RBKC Local Plan (2019)³, and
- TfL Transport Assessment guideline (2019)⁴.

7.3 The revised version of the Draft London Plan, the Intend to Publish (ItP) London Plan, has been published (December 2019). The relevant transport standards are unchanged and therefore the scheme and previous supporting documents remain valid.

7.4 A revised Transport Assessment guidance (TfL, June 2019) introducing Healthy Streets Transport Assessments has been published since the 2018 TA ('Transport Assessment') and 2019 TAA ('Transport Assessment Addendum'). Referable planning applications are now required to submit a Transport Assessment in line with this guideline. An exception can be made for schemes which have been ongoing and have started the planning process prior to the guideline publication.

7.5 A Healthy Streets review including a benchmark of the development against the ten Healthy Streets indicators was carried out to ascertain whether the Proposed Development aligns with the founding principles of the new Guidance.

7.6 Although representing a major change in methodology the new Transport Assessment is unlikely to fundamentally change the conclusions of the previous assessments in relation to the Proposed Development, the new Guidance has therefore no material impact on the Proposed Development that is aligned with Healthy Streets principles.

7.7 A more detailed commentary on the Proposed Development conformity with Healthy Streets can be found in the Transport Assessment Addendum (July 2020) (ES Volume 3, Appendix: Traffic and Transport).

7.8 A revised RBKC Consolidated Local Plan was adopted in September 2019. Policy CT1 focusses on improving alternatives to car use, making it easier and more attractive to walk, cycle and use public transport and seeks to manage traffic congestion and the supply of car parking.

7.9 The requirements of the revised RBKC Consolidated Local Plan have already been addressed and complied with by the Proposed Development.

ASSESSMENT METHODOLOGY

7.10 The ES traffic and transport guidance has not changed, therefore the transport addendum previously submitted follows the current methodology.

BASELINE CONDITIONS

7.11 The baseline transport networks presented in the 2018 TA ('Transport Assessment') and 2019 TAA ('Transport Assessment Addendum') included:

- Pedestrian and cycle accessibility review
 - It should be noted that this review was supported by PERS and CLoS audits. Whilst the results of the audits remain valid, TfL has issued new transport assessment and best practice guidance which is promoting Active Travel Zone Assessments and Cycle Route Quality Audit tools as a method to ascertain the baseline conditions of the pedestrian and cycle networks.
- Public transport accessibility review
 - It should be noted that the PTAL (public transport accessibility level) for the site is excellent, whilst this remains true it should be noted that currently public transport services are operating under exceptional circumstances due to COVID19.
- Road network review
 - It should be noted that the baseline road network commentary and assessment relied upon data collected in 2016 to quantify the traffic flows, whilst the conclusions of the surveys for the specific timeframe remain valid more recent data is now available, however road networks are currently operating under exceptional and uncharacteristic circumstances due to COVID19.
- Parking review
 - the current site arrangements remain unchanged.
- Personal Injury Accident (PIA) review
 - It should be noted that the review carried out included data for a 3-year period (2014-2017), whilst the conclusions of the PIA review for the specific timeframe remain valid more recent data is now available.

7.12 In consideration of the above, ordinarily the baseline transport network analysis would be validated by newly collected data, in particular with regards to:

- Out of date surveys such as the traffic surveys that are 4 years (48 months) old. New 'neutral period' surveys should be carried out to validate the previously presented baseline. In light of the recent pandemic (COVID19) and subsequent lockdown measures and social distancing measures which impact the highway layout, the transport network operations and usage has been affected. This was acknowledged by Government who are monitoring transport network usage. Any traffic surveys carried out in this period therefore would not be 'neutral', and could not be relied on to provide a 'neutral baseline'; and
- Personal Injury Accident (PIA) data to include 2017 – 2019 information. The PIA information available for this period does not contain description of the accident therefore it would add little benefit, furthermore the development contributes to improvement of the public realm and pedestrian safety which would ultimately mitigate risks flagged by the PIA review.

7.13 Since the Proposed Development is already contributing to improve the public realm, and is aligned with Healthy Streets principles, additional audits such as the Active Travel Zone and Cycle Route Quality Audit are not deemed necessary.

7.14 In consideration of the exceptional circumstances (COVID-19), the 2018 TA and 2019 TAA baseline and associated ES remain the most reliable baseline information and therefore valid.

RECEPTORS AND RECEPTOR SENSITIVITY

7.15 No additional or new receptors have been introduced to the surroundings.

7.16 There are no proposed amendments to the Proposed Development which would result in changes to either the type or sensitivity of the introduced receptors.

7.17 On the above basis, the receptors and receptor sensitivities described in the June 2018 Traffic and Transport ES Chapter and April 2019 ES Addendum remain valid and unchanged.

¹ DCLG, 2019. 'National Planning Policy Framework'

² GLA, 2019. The London Plan – Intend to Publish, December 2019

³ RBKC, 2019. Local Plan, September 2019

⁴ TfL, 2019, Healthy Streets Transport Assessment guidelines

POTENTIAL EFFECTS

7.18 It is not anticipated that there will be additional or different effects resulting from the Proposed Development as presented in the June 2018 Traffic and Transport ES Chapter and associated TA and April 2019 ES Addendum and TAA.

MITIGATION AND RESIDUAL EFFECTS

7.19 There are no changes to the mitigation and residual effects stated within the June 2018 Traffic and Transport ES Chapter and April 2019 ES Addendum. Consequently, all mitigation measures as previously stated remain applicable and valid.

LIKELY SIGNIFICANT EFFECTS

7.20 With the mitigation adopted in the June 2018 Traffic and Transport ES Chapter and April 2019 ES Addendum there will be no residual adverse Significant Effects during construction and once the Proposed Development is complete and operational. There will be significant beneficial effects to amenity, fear and intimidation for existing pedestrians in the area and future residents, visitors and staff of the site once the Amended Proposed Development is completed and operational.

CLIMATE CHANGE

7.21 The impacts of climate change discussed in the June 2018 traffic and Transport ES Chapter are not affected by the updates to the UK Climate Projections since the June 2018 ES was prepared, and the conclusions drawn in the June 2018 ES remain valid.

CUMULATIVE EFFECTS ASSESSMENT

7.22 The conclusions reached within the June 2018 Traffic and Transport ES Chapter and April 2019 ES Addendum Chapter in relation to cumulative effects remain valid.

7.23 The Heythorp College development (ref. PP/18/05313) was identified as additional cumulative development. This scheme is unlikely to impact the cumulative impact effects in relation to traffic and transport due to distance (over 600m) from the site.

7.24 A planning application for the redevelopment of the 100 West Cromwell Road (ref. PP/19/00781) was submitted to RBKC in January 2019. It was confirmed in July 2019 that, having considered RBKC’s decision, the Mayor of London would act as the local planning authority for the purposes of determining the application.

7.25 Following a review of BRKC’s reasons for refusal and discussions with Officers at the GLA, a number of amendments were made to the scheme. These changes were summarised in the Transport Assessment issued in October 2019 which included an additional 41 affordable units, which brought the total residential units to 462.

7.26 The table below demonstrates the net change in vehicular flows compared to the 2017 consented scheme.

Proposal	AM Peak		PM Peak	
	In	Out	In	Out
2017 Consented Scheme	25	26	35	29
Proposed Scheme	14	39	23	17
Net Change (Proposed – Consented)	-11	13	-12	-12

7.27 The new proposals result in a net increase of two additional two-way vehicular trips in the AM peak, and a net reduction of 24 two-way vehicular trips in the PM peak. The Transport Assessment states that given the low vehicle volumes during peak hours the development does not warrant a more detailed assessment.

7.28 The scheme would therefore not be considered on as a cumulative scheme on a transport basis as the number of vehicular trips generated from the revised scheme will not significantly impact on the local highway network.

7.29 These schemes are unlikely to impact the cumulative effects conclusions as illustrated in the June 2018 ES and April 2019 ES Addendum.

Chapter 8: Noise and Vibration (Statement of Conformity)

INTRODUCTION

- 8.1 The review of the Noise and Vibration assessment has been undertaken by Sandy Brown, the authors of the chapter in the June 2018 ES and the April 2019 ES Addendum.

LEGISLATION, PLANNING POLICY AND GUIDANCE

- 8.2 Since the submission of the June 2018 ES and April 2019 ES Addendum, the following changes to national and local policy documents have occurred:
- The National Planning Policy Framework (NPPF) has been published (2018) and revised (2019);
 - The Draft London Plan (2017) has been superseded by the “Intent to Publish London Plan” (2019); and
 - The Local Plan has been updated (2019).
- 8.3 There have been no changes to legislation, national, regional and local planning policy, and guidance which are directly relevant to the noise and vibration assessment or significance criteria set.
- 8.4 The updated and revised NPPF, like the previous version and draft version, does not contain quantitative guidance relating to noise, and therefore does not influence the assessment or significance criteria set.
- 8.5 The “Intent to Publish London Plan” contains the same referenced policies as the Draft London Plan, namely D13 “Agent of Change” and D14 “Noise”. The “Intent to Publish London Plan” has some minor changes to the policies included in the Draft London Plan, though these changes do not influence the assessments or significance criteria set.
- 8.6 The Local Plan 2019 contains the same policy (CE6) as referenced in the June 2018 ES Chapter.
- 8.7 Consequently, the policy and assessments remain applicable and valid.

ASSESSMENT METHODOLOGY

- 8.8 No new relevant methodologies pertinent to the undertaking of noise and vibration surveys or the assessment of noise and vibration effects have been published since undertaking the noise and vibration surveys or submitting the June 2018 ES and subsequent April 2019 ES Addendum. Consequently, the assessment methodology and significance criteria stated within the June 2018 Noise and Vibration ES Chapter remain applicable and valid.

BASELINE CONDITIONS

- 8.9 The baseline noise and vibration conditions are determined by the nearby roads and underground trains respectively. Since the noise and vibration surveys (undertaken in October 2017) there have been no changes to the roads or rail network that would be material enough to result in anything more than a minor change (i.e. less than 3 dB) in the noise or vibration levels in or around the site.
- 8.10 On the above basis, the baseline conditions reported within the June 2018 ES and April 2019 ES Addendum Noise and Vibration Chapter remain valid and unchanged.

RECEPTORS AND RECEPTOR SENSITIVITY

- 8.11 No additional or new receptors have been introduced to the surroundings.
- 8.12 There are no proposed amendments to the Proposed Development which would result in changes to either the type or sensitivity of the introduced receptors.
- 8.13 On the above basis, the receptors and receptor sensitivities described in the June 2018 and April 2019 ES Addendum Noise and Vibration ES Chapter remain valid and unchanged.

POTENTIAL EFFECTS

- 8.14 It has already been established that there have been no changes to legislation, planning policy and guidance, to the assessment methodology and significance criteria, or the baseline conditions relevant to the assessment.
- 8.15 As the Proposed Development remains unchanged from the April 2019 ES Addendum, the potential effects of the Proposed Development (during demolition and construction and once completed and operational) presented in the June 2018 Noise and Vibration ES Chapter remain applicable and valid.

MITIGATION AND RESIDUAL EFFECTS

- 8.16 As demonstrated above, the likely effects of both demolition and construction works and the completed and operational Proposed Development remain as stated within the June 2018 and April 2019 ES Addendum Noise and Vibration ES Chapter. Consequently, all mitigation measures and therefore residual effects as previously stated, remain applicable and valid.

LIKELY SIGNIFICANT EFFECTS

- 8.17 With the mitigation adopted in the June 2018 and April 2019 ES Addendum Noise and Vibration ES Chapter there will be no residual Significant Effects associated with the Amended Proposed Development.

CLIMATE CHANGE

- 8.18 The climate change projections have been updated to reflect the more recent UK Climate Projections, as per UKPC18. The updated projections do not change the assessments or conclusions reached within the June 2018 Noise and Vibration ES Chapter and therefore they remain valid.

CUMULATIVE EFFECTS ASSESSMENT

- 8.19 The conclusions reached within the June 2018 Noise and Vibration ES Chapter in relation to cumulative effects remain valid. Two additional cumulative schemes are to be considered for this ES Addendum and are outlined in Chapter 1 of this ES Addendum: **Chapter 1, ES Addendum Introduction and Approach**.
- 8.20 The two additional schemes (Heythrop College and 100 West Cromwell Road) are sufficiently far from the Proposed Development that noise emissions associated with them (either during construction or operation) will not influence the baseline conditions or the assessments presented.

Chapter 9: Air Quality (Statement of Conformity)

INTRODUCTION

- 9.1 The review of the Air Quality assessment has been undertaken by Air Quality Consultants, the authors of the chapter in the June 2018 ES and the April 2019 ES Addendum.

LEGISLATION, PLANNING POLICY AND GUIDANCE

- 9.2 There have been five updates to relevant legislation, national, regional and local planning policy, and guidance, since the submission of the June 2018 ES and April 2019 ES Addendum relevant to the air quality assessment. The newly published documents are:
- The National Planning Policy Framework (2019)¹;
 - The Clean Air Strategy (2019)²;
 - The 'Intend to Publish' version of the new London Plan (2019)³; and
 - The RBKC Local Plan (2019)⁴.
- 9.3 None of the changes to legislation, national, regional and local planning policy, or guidance, have implications for the assessment, as the assessment already satisfies their requirements. The Intend to Publish version of the London Plan introduces a requirement for major developments to be "Air Quality Positive", however, no methodology for assessing this has yet been published, thus it is not possible to establish whether the proposed development is Air Quality Positive. The scheme is, though, better than Air Quality Neutral, which is also a requirement of these key policy documents.

ASSESSMENT METHODOLOGY

- 9.4 There are no changes to the general assessment methodology set out with the June 2018 Air Quality ES Chapter and April 2019 ES Addendum Chapter. However, a number of the tools used in the assessment have been updated since the assessment was carried out:
- the ADMS-Roads dispersion model has been updated to version 5.0;
 - the ADMS-5 dispersion model has been updated to version 5.2;
 - Defra's Emission Factor Toolkit (EFT) has been updated to version 9.0;
 - Defra's NOx to NO₂ Calculator has been updated to version 7.1;
 - Defra's background maps have been updated for the base year 2017; and
 - the CURED emissions toolkit has been demonstrated to be unnecessary as a sensitivity test, and discontinued.
- 9.5 The use of the latest tools listed above in the air quality assessment would not be expected to alter the predicted air quality impacts or the conclusions of the assessment. Use of these updated tools could lead to the predicted pollutant concentrations in 2026 being slightly different to those presented in the June 2018 ES. However, any differences would be minor and as described above not expected to change the predicted air quality impacts or the conclusions of the June 2018 ES and April 2019 ES Addendum assessments, which remain valid.
- 9.6 It is also worth noting that the June 2018 Air Quality ES Chapter included a worst-case sensitivity test for traffic emissions using the CURED emissions tool. The CURED tool has been retired since the release of the latest Defra EFT, and an analysis of trends in roadside air quality monitoring, which has demonstrated that there is

no longer a need for such as worst-case sensitivity test⁵. The predicted air quality impacts in the June 2018 ES using the CURED tool were negligible at all receptors and therefore removal of the need for a sensitivity test using this tool would not affect the predicted impacts or conclusions of the assessment; the assessment is worst-case for having the used the CURED tool in addition to the lower concentrations predicted using the EFT.

BASELINE CONDITIONS

- 9.7 The baseline conditions have changed since the June 2018 Air Quality ES Chapter and April 2019 ES Addendum was prepared. Nitrogen dioxide concentrations in central London have reduced, as is demonstrated by the measured concentrations in recent years at the nearby Cromwell Road automatic monitoring site, which are presented in **Table 9.1** (having been downloaded from the Air Quality England website⁶). The base year used for the June 2018 ES Chapter and April 2019 ES Addendum was 2016; measured concentrations at Cromwell Road in 2019 were 25% lower than in 2016, as is shown in the data in **Table 9.1**.

Table 9.1 Summary of Annual Mean NO₂ Monitoring at Cromwell Road (2016 – 2019) (µg/m³)

Site No.	Site Type	Location	2016	2017	2018	2019
KC2	Roadside	Cromwell Road	58	51	48	44
Objective			40			

- 9.8 The annual mean PM₁₀ concentration at the monitor was 22 µg/m³ in 2016, 20 µg/m³ in 2017 and 18 µg/m³ in 2018, suggesting similar reductions for this pollutant; the monitor ceased to measure PM₁₀ concentrations in April 2019. The monitor ceased to measure PM_{2.5} concentrations in October 2017, so local changes to baseline concentrations of this pollutant cannot readily be evidenced, although they are likely to have reduced in line with PM₁₀ concentrations.
- 9.9 The future baseline conditions are also likely to have positively changed compared to what was reported in the June 2018 Air Quality ES Chapter. The Mayor of London has announced that the Ultra-Low Emission Zone ('ULEZ') will be expanded in 2021, which can be expected to reduce pollutant concentrations along Cromwell Road and throughout most of London. Other studies⁵ have also demonstrated that Defra's tools are likely to under-predict the take-up of zero tailpipe emissions vehicles, resulting in over-predicted emission factors and background concentrations. These factors combined suggest that the future baseline concentrations used in the June 2018 Air Quality ES Chapter and April 2019 ES Addendum were likely higher than will occur in reality when the Proposed Development becomes operational, thus total concentrations, and impacts, are likely to present a worst-case assessment.
- 9.10 Local baseline conditions have all improved in recent years, with annual mean nitrogen dioxide concentrations at the nearby Cromwell Road automatic monitoring site some 25% lower in 2019 than they were in 2016. It can reasonably be expected that, were the assessment to be updated to incorporate the latest baseline conditions, the predicted concentrations in both the base and future years would be lower than those in the June 2018 Air Quality ES Chapter and April 2019 ES Addendum. Therefore, the baseline concentrations used in the June 2018 ES provide for a worst-case assessment of the air quality impacts of the Proposed Development, as the development itself has not changed since then. Total concentrations will be lower, which will ensure that the impacts of the Proposed Development (which may themselves be less than presented in the June 2018 ES due to the changes described in Paragraph 9.9) will be no more severe than those presented in the June 2018 ES.

¹ DCLG, 2019. 'National Planning Policy Framework'

² Defra, 2019. Clean Air Strategy 2019

³ GLA, 2019. The London Plan – Intend to Publish, December 2019

⁴ RBKC, 2019. Local Plan, September 2019

⁵ AQC, 2020. Performance of Defra's Emission Factor Toolkit 2013 – 2019. Available:

<https://www.aqconsultants.co.uk/CMSPages/GetFile.aspx?guid=7fba769d-f1df-49c4-a2e7-f3dd6f316ec1>

⁶ Ricardo Energy & Environment, 2020. Air Quality England, Available: <https://www.airqualityengland.co.uk/>

As a result, with both schemes having entirely negligible off-site impacts, it is considered that there is no risk of significant cumulative effects.

RECEPTORS AND RECEPTOR SENSITIVITY

- 9.11 No new or additional receptors have been identified.
- 9.12 There are no proposed amendments to the Proposed Development which would result in changes to either type or sensitivity of the introduced receptors.
- 9.13 On this basis, the receptors and receptor sensitivity described in the June 2018 Air Quality ES Chapter and April 2019 ES Addendum remain valid and unchanged.

POTENTIAL EFFECTS

- 9.14 It has been demonstrated that baseline conditions have changed since the June 2018 ES was prepared, with improvements in local air quality. It has also been demonstrated that vehicle emissions, and pollutant concentrations, are likely to be lower in 2026 (the opening year of the Proposed Development) than was predicted in the June 2018 ES. The baseline conditions used in the June 2018 ES therefore represent a worst-case scenario. It is expected that actual baseline concentrations in 2026 will be lower, and that, as a result, the impacts of development-generated traffic emissions on existing receptors will be less than those presented in the June 2018 Air Quality ES Chapter and April 2019 ES Addendum, and all remain **Negligible**.
- 9.15 It is, therefore, judged that the effects of the Proposed Development (during demolition and construction and once completed and operational) will be the same as those identified in the June 2018 Air Quality ES chapter and April 2019 ES Addendum, and are **not significant**.

MITIGATION AND RESIDUAL EFFECTS

- 9.16 No changes to the mitigation recommended in the June 2018 ES are required, and the residual impacts and effects will remain the same as those set out in the June 2018 Air Quality ES Chapter and April 2019 ES Addendum.

LIKELY SIGNIFICANT EFFECTS

- 9.17 The construction and operation of the Proposed Development are not predicted to result in any significant effects in relation to air quality.

CLIMATE CHANGE

- 9.18 The impacts of climate change discussed in the June 2018 Air Quality ES Chapter are not affected by the updates to the UK Climate Projections since the June 2018 ES was prepared, and the conclusions drawn in the June 2018 ES remain valid.

CUMULATIVE EFFECTS ASSESSMENT

- 9.19 Two additional cumulative schemes have been identified for consideration in this ES Addendum, namely Heythrop College and 100 West Cromwell Road.
- 9.20 The Heythrop College site is located away from any major roads and some 700 m from the Proposed Development. The air quality assessment for the Heythrop College scheme did not identify any potentially significant impacts as a result of that scheme along Cromwell Road, with the focus of that assessment principally being impacts along Kensington High Street. It is judged that emissions generated by the two schemes will affect different geographical areas, and that there will be no significant cumulative effects.
- 9.21 The 100 West Cromwell Road scheme is located approximately 1 km to the west of Kensington Forum, along Cromwell Road. All of the impacts of the Proposed Development at existing receptors have been shown to be negligible; the Air Quality ES Chapter for 100 West Cromwell Road demonstrated the same for that scheme.

- 9.22 The cumulative effects of the Amended Proposed Development will remain **'not significant'**.

Chapter 10: Daylight, Sunlight, Overshadowing and Solar Glare (Statement of Conformity)

INTRODUCTION

- 10.1 The review of the Daylight, Sunlight, Overshadowing and Solar Glare assessment has been undertaken by Point 2, the authors of the June 2018 ES and April 2019 ES Addendum.

LEGISLATION, PLANNING POLICY AND GUIDANCE

National Planning Policy Framework February 2019

- 10.2 Since the submission of the June 2018 ES and April 2019 ES Addendum, the Draft National Planning Policy Framework (NPPF) published in 2018 has been replaced by a final version of the NPPF, published in June 2019.
- 10.3 The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. It states that the purpose of the planning system is to contribute to the achievement of sustainable development; and that the planning system must meet interdependent overarching objectives summarised as: an economic objective, a social objective and an environmental objective.
- 10.4 Chapter 11 of the NPPF deals with "Making effective use of land." Under the sub-heading "Achieving appropriate densities" it states at paragraph 123c that:
"... authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight where they would otherwise inhibit making efficient use of the site..."

Intend to Publish London Plan 2019

- 10.5 The Draft London Plan (2017) has been replaced by the Intend to Publish London Plan, presented to the Mayor in 2019; the policies related to Daylight, Sunlight, Overshadowing and Solar Glare remain consistent with the previous version.
- 10.6 Policy D6 – Housing Quality and Standards states that:
"The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context..."
- 10.7 Policy D9 – Tall Buildings states that:
"...buildings should not cause adverse reflected glare" "...daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces..."

Royal Borough of Kensington and Chelsea Local Plan 2019

- 10.8 The Royal Borough of Kensington and Chelsea Local Plan was updated in 2019.
- 10.9 Policy CL5 – Living Conditions states that:
- 10.10 "The Council will require all development ensures good living conditions for occupants of new, existing and neighbouring buildings." [and] "To deliver this the Council will: ...ensure that good standards of daylight and sunlight are achieved in new development and in existing properties affected by new development; and where they are already substandard, that there should be no material worsening of the conditions";
- 10.11 Policy CH2 – Affordable Housing states that:
"The Council will seek the maximum reasonable amount of affordable housing." [and] "To deliver this the Council will require: the affordable and market housing to have equivalent amenity in relation to factors including views, siting, daylight, noise and proximity to open space, playspace, community facilities and shops."
- 10.12 None of the updates to the above referenced policies give rise to the necessity to change or add anything to the daylight, sunlight, overshadowing and solar glare assessments which informed the content of the June 2018 ES or April 2019 ES Addendum.
- 10.13 There are no other changes or relevant policies to Daylight, Sunlight, Overshadowing and Solar Glare and, therefore, the policy and assessments in the June 2018 ES and April 2019 ES Addendum remain applicable and valid.

ASSESSMENT METHODOLOGY

- 10.14 No further guidance on Daylight, Sunlight, Overshadowing and Solar Glare has been published since the submission of the June 2018 ES and April 2019 ES Addendum; therefore, the assessment methodology set out with the June 2018 and April 2019 ES Addendum Daylight, Sunlight, Overshadowing and Solar Glare Chapter remains valid.

BASELINE CONDITIONS

- 10.15 The existing site has not changed since June 2018, and the existing surrounding buildings remain consistent with the scenario assessed and presented in the June 2018 ES. Since there are no significant changes at the existing site and surroundings, Daylight, Sunlight, Overshadowing and Solar Glare conditions presented in the June 2018 ES and April 2019 ES Addendum remain valid for the baseline scenario.

RECEPTORS AND RECEPTOR SENSITIVITY

- 10.16 There are no changes to receptors or receptor sensitivity.
- 10.17 Therefore, the receptors and receptor sensitivities described in the June 2018 Daylight, Sunlight, Overshadowing and Solar Glare ES Chapter and April 2019 ES Addendum remain valid and unchanged.

POTENTIAL EFFECTS

- 10.18 There are unlikely to be any additional or different effects resulting from the Proposed Development in comparison to those presented within the June 2018 and April 2019 ES Addendum Daylight, Sunlight, Overshadowing and Solar Glare Chapter.

MITIGATION AND RESIDUAL EFFECTS

- 10.19 There are no changes to the mitigation and residual effects stated in the June 2018 Daylight, Sunlight, Overshadowing and Solar Glare ES Chapter and April 2019 ES Addendum. Additionally, no further mitigation is required due to the Proposed Development.

LIKELY SIGNIFICANT EFFECTS

- 10.20 As concluded in the June 2018 and April 2019 ES Addendum Daylight, Sunlight, Overshadowing and Solar Glare Chapter, there are no significant effects resulting from the Proposed Development.

CLIMATE CHANGE

- 10.21 The impacts of climate change discussed in the June 2018 Daylight, Sunlight, Overshadowing and Solar Glare ES Chapter are not affected by the updates to the UK Climate Projections. The conclusions drawn in the June 2018 ES remain valid and unchanged.

CUMULATIVE EFFECTS ASSESSMENT

- 10.22 Since the submission of the June 2018 ES and April 2019 ES Addendum, the Heythorp College development (ref. PP/18/05313) and 100 West Cromwell Road (ref. PP/19/00781) development have been identified as additional cumulative schemes. These developments are located more than 600m respectively to the north and west of the Site, and based on Point 2 experience these schemes are unlikely to have any significant impact on the Daylight, Sunlight, Overshadowing and Solar Glare effects of the Proposed Development taken together.
- 10.23 Therefore, there are no expected changes to the cumulative effect assessment as a result of these additional cumulative schemes. This section of the June 2018 Daylight, Sunlight, Overshadowing and Solar Glare ES Chapter remains valid.

Chapter 11: Wind Microclimate (Statement of Conformity)

INTRODUCTION

- 11.1 The review of the Wind Microclimate assessment has been undertaken by RWDI, the authors of the June 2018 ES and April 2019 ES Addendum.

LEGISLATION, PLANNING POLICY AND GUIDANCE

- 11.2 Since the submission of the June 2018 ES and April 2019 ES Addendum, the Draft National Planning Policy Framework published in 2018 has been replaced by a final version of the National Planning Policy Framework, published in June 2019.

- 11.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. It states that the purpose of the planning system is to contribute to the achievement of sustainable development; and that the planning system must meet interdependent overarching objectives summarised as: an economic objective, a social objective and an environmental objective.

- 11.4 There are no policies or statements that are directly related to the wind microclimate, although the promotion of high-quality built environments was emphasised in the NPPF.

- 11.5 The National Planning Practice Guidance (NPPG) to which reference is made in the June 2018 ES has been updated in October 2019; There is no guidance within the NPPG related to tall buildings and wind microclimate issues.

- 11.6 The Draft London Plan (2017) has been replaced by the Intend to Publish London Plan, presented to the Mayor in 2019; the policies related to the wind microclimate remain consistent with the previous version. These policies include:

- Policy D8 Public realm, Development Plans and development proposals, states that:
 - *“Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm.”*
 - *“Ensure that appropriate shade, shelter, seating [...] with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place.”*
- Policy D9 Tall buildings: Environmental impact, states that:
 - *“Wind [...] around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building”;*
 - *“Air movement affected by the building(s) should [...] not adversely affect street-level conditions”.*
- Policy D9 Tall buildings: Cumulative impacts, states that:
 - *“The cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.”*

- 11.7 The Royal Borough of Kensington and Chelsea Local Plan has been updated in 2019; Chapter 21 (An Engaging Public Realm) of the RBKC Local Plan states under Trees and Landscape in Paragraph 21.3.32:

- *“Street trees [...] act as [...] wind barriers [...].”*

- 11.8 There are no other changes or relevant policies to wind microclimate; therefore, the policy and assessments in the June 2018 ES and April 2019 ES Addendum remain applicable and valid.

ASSESSMENT METHODOLOGY

- 11.9 No further guidance on wind microclimate has been published since the submission of the June 2018 ES and April 2019 ES Addendum; therefore, the assessment methodology set out with the June 2018 and April 2019 ES Addendum Wind Microclimate Chapter remains valid.

BASELINE CONDITIONS

- 11.10 The existing site has not changed since June 2018, and the existing surrounding buildings remain consistent with the scenario wind tunnel tested and presented in the June 2018 ES. Since there are no significant changes at the existing site and surroundings, wind conditions presented in the June 2018 ES and April 2019 ES Addendum remain valid for the baseline scenario.

RECEPTORS AND RECEPTOR SENSITIVITY

- 11.11 There are no changes to receptors or receptor sensitivity.

- 11.12 Therefore, the receptors and receptor sensitivities described in the June 2018 Wind Microclimate ES Chapter and April 2019 ES Addendum remain valid and unchanged.

POTENTIAL EFFECTS

- 11.13 As there have been no changes to the scheme there should not be any additional or different effects resulting from the Proposed Development in comparison with that presented within the June 2018 ES and April 2019 ES Addendum Wind Microclimate Chapter. The wind conditions at ground and rooftop level are also expected to remain as presented within the June 2018 ES and April 2019 ES Addendum.

- 11.14 The proposed balconies presented with the April 2019 ES Addendum will have side screens with a solid balustrade, which will provide sufficient shelter to occupants. Furthermore, the proposed balconies are located at the lower levels of the Proposed Development where suitable wind conditions are expected.

MITIGATION AND RESIDUAL EFFECTS

- 11.15 There are no changes to the mitigation and residual effects stated in the June 2018 Wind Microclimate ES Chapter and April 2019 ES Addendum. Additionally, no further mitigation is required due to the Proposed Development.

LIKELY SIGNIFICANT EFFECTS

- 11.16 As concluded in the June 2018 ES and April 2019 ES Addendum Wind Microclimate Chapter there are no significant effects resulting from the Proposed Development.

CLIMATE CHANGE

- 11.17 The “Climate Projects Report” published by UKCP09 to which reference is made in the June 2018 ES has been replaced by the UK Climate Projections (UKCP18) (2018); The ‘Climate Projects Report’ published by UKCP18 presents the probable changes in wind speed for 2070 - 2099 in both the summer and winter seasons. With these predictions, the current trends in the climate change are not likely to have any significant effects on the predicted wind microclimate conditions in and around the Proposed Development. It is therefore not necessary to provide a quantitative analysis of the increase in storm frequency and its implication on the effect on the wind microclimate for the Proposed Development.

- 11.18 There are no changes or updates to the climate change section of the June 2018 and April 2019 ES Addendum Wind Microclimate Chapter which remains valid.

CUMULATIVE EFFECTS ASSESSMENT

- 11.19 Since the submission of the June 2018 ES and April 2019 ES Addendum, the Heythorp College development (ref. PP/18/05313) and 100 West Cromwell Road (ref. PP/19/00781) development have been identified as additional cumulative schemes. These developments are located more than 600m respectively to the north and west of the Site, and based on RWDI experience these schemes are not considered likely have any significant impact on the wind microclimate at and surrounding the Proposed Development when taken together with it.

- 11.20 Therefore, there are no expected changes to the cumulative effect assessment as a result of these additional cumulative schemes, and this section of the June 2018 Wind Microclimate ES Chapter remains valid.

Chapter 12: Conclusions

INTRODUCTION

- 12.1** This chapter summarises the conclusions of the ES Addendum while providing an overview to the updates of Chapter 12: Effects Interactions, Chapter 13: Likely Significant Effects and Chapter 14: Mitigation and Monitoring Schedule of the June 2018 ES and Chapter 12: Conclusions of the April 2019 ES Addendum.

ES CHAPTER 12 EFFECTS INTERACTIONS

- 12.2** When taking into consideration ES Chapters 6 to 11 of this Volume of the 2020 ES Addendum and ES Volume 2 Townscape, Visual and Heritage Impact Assessment Addendum, no additional effects interactions are likely to occur from the Proposed Development. Therefore, Chapter 12: Effects Interactions, as presented in the June 2018 ES and April 2019 ES Addendum, remains valid.

ES CHAPTER 13 LIKELY SIGNIFICANT EFFECTS

- 12.3** When taking into consideration ES Chapters 6 to 11 of this Volume of this 2020 ES Addendum and ES Volume 2 Townscape, Visual and Heritage Impact Assessment Addendum, no new or additional likely significant effects have been identified. Therefore, the likely significant effects in Chapter 13: Likely Significant Effects, as presented in the June 2018 ES and April 2019 ES Addendum, remains valid.

ES CHAPTER 14 MITIGATION AND MONITORING SCHEDULE

- 12.4** When taking into consideration ES Chapters 6 to 11 of this Volume of this 2020 ES Addendum and ES Volume 2 Townscape, Visual and Heritage Impact Assessment Addendum, no new or additional mitigation has been identified or is required with the exception of potential financial contributions towards provision of additional secondary school capacity if deemed necessary by the Council, which could be secured through use of CIL. The reduction in surplus secondary school capacity since the April 2019 ES Addendum has created a more sensitive baseline condition for the assessment of secondary education and the demand of additional secondary school places created by the Proposed Development. Therefore, the mitigation and monitoring schedule (subject to the addition of these socio-economic mitigation measures of financial contributions through CIL) in Chapter 14: Mitigation and Monitoring Schedule, as presented within the June 2018 ES and April 2019, remains valid.

CONCLUSIONS

- 12.5** This 2020 ES Addendum has considered whether the Proposed Development as a whole is likely to give rise to any new or materially different significant environmental and socio economic effects, or change any of the conclusions of the June 2018 ES and April 2019 ES Addendum.
- 12.6** The Proposed Development, as presented in this ES Addendum, does not materially change the outcomes and conclusions of the June 2018 ES and April 2019 ES Addendum.