

Kensington Forum

QUEENSGATE
INVESTMENTS

Rockwell

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Kensington Forum Hotel – London

ENVIRONMENTAL STATEMENT – NON TECHNICAL SUMMARY | APRIL 2019

Kensington Forum

Environmental Statement

Addendum

Non-Technical Summary Addendum

Prepared for:
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INTRODUCTION

- 1 This Non-Technical Summary ('NTS') Addendum presents a summary of the findings of an Environmental Statement Addendum ('ES Addendum') prepared on behalf of Queensgate Bow UK Holdco Limited ('the Applicant').
- 2 The ES Addendum and this NTS Addendum accompanies post submission proposed amendments to a hotel led scheme (the 'Proposed Development') on land to the south of Cromwell Road ('the site'), which was subject to a detailed planning application (PP/18/03461) submitted to the Royal Borough of Kensington and Chelsea ('the RBKC') on the 18 June 2018. An Environmental Statement (ES) accompanied this application ('the June 2018 ES').
- 3 The original Proposed Development, which was the subject of the June 2018 ES, 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.'
- 4 Figure 1 presents the Proposed Development assessed in the June 2018 ES.

Figure 1 June 2018 Proposed Development



- 5 On 25th October 2018, at the RBKC October Planning Committee, the RBKC resolved to refuse planning permission for the Proposed Development.
- 6 On the 23rd April 2019, the Mayor of London directed the RBKC (under his relevant powers) that he would act as the planning authority for determining this planning application, and thereby 'calling in' the planning application.
- 7 A number of proposed design changes (hereinafter referred to as the 'Proposed Amendments') have been made to the Proposed Development to address the reasons for refusal.

THE PROPOSED AMENDMENTS

8 The Proposed Amendments to the development are summarised as follows:

- Increase of residential units by 16, from 46 to 62 units;
- All residential units have become affordable i.e. social rented, therefore a total of 62 affordable units are now proposed;
- An additional two storeys on top of the podium to accommodate the additional residential units;
- Internal reconfigurations to the residential dwellings;
- The residential garden and terrace previously on level 7 has moved up by two storeys, now being located on level 9. This area has been amended to include an increase in playspace to a total of 530m² playspace now provided;
- The bay windows on the southern-most façade of the podium has been expanded out by 750mm;
- A number of balconies have been 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 have been fully integrated into the Proposed Amendments;
- The ground floor residential lobbies have been consolidated into one entrance space and the cycle store has increased in size; and
- The bike store and refuse store in the basement level B1 have been 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.

9 The description of development for the amended scheme comprises:

'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 highway works and creation of new publicly accessible open space with associated hard and soft landscaping.'

DESIGN EVOLUTION

10 The key changes focus on increasing the number of residential units proposed, and the provision of all units being affordable rent.

11 The design of the additional 16 apartments was extensively considered with two more floors of eight apartments each above the proposed location of the residential accommodation at the Courtfield Road end of the podium deemed the most appropriate approach in design terms. To complete the additional massing the two towers have been joined at their base, incorporating the independent external plant into the main massing (Figure 2). The Amended Proposed Development is shown in Figure 3.

Figure 2 Additional floorspace added to the Proposed Development

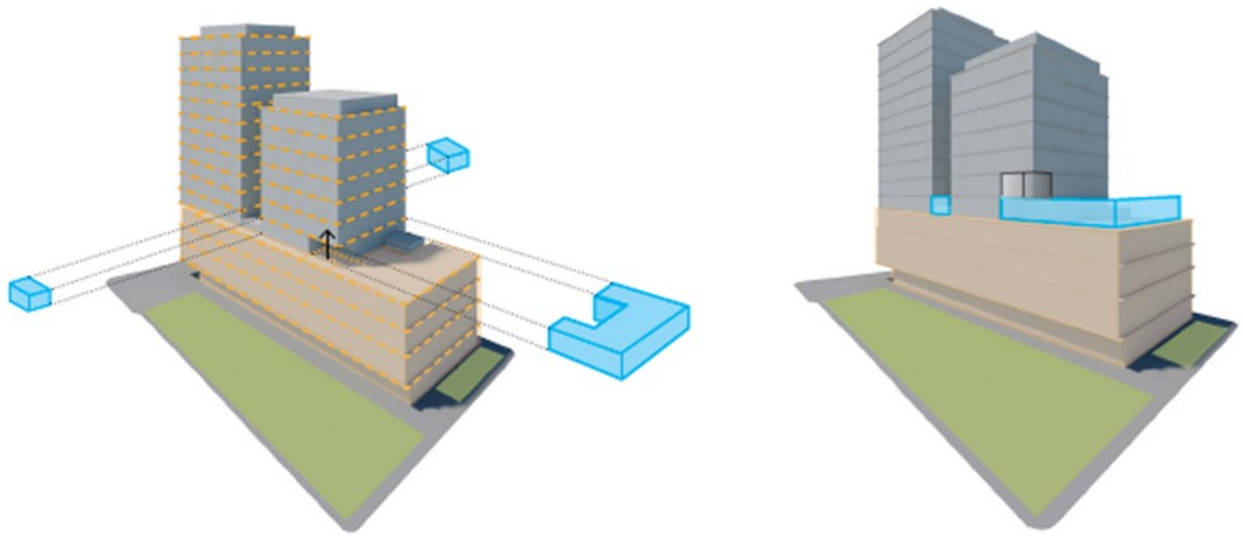


Figure 3 Amended Proposed Development



APPROACH TO THE ES ADDENDUM

- 12 The ES Addendum builds on the analysis and assessments presented in the June 2018 ES to provide information necessary to assess the likely significant effects of not only the Proposed Amendments in isolation, but also the Amended Proposed Development as a whole (i.e. the complete scheme with all design changes incorporated). The ES Addendum should be read alongside the June 2018 ES, and this NTS Addendum should be read alongside the June 2018 NTS.
- 13 While considering the Amended Proposed Development as a whole, the assessment presented in the ES Addendum is focused on updating the June 2018 ES, as relevant, to reflect the Proposed Amendments and any changes to the conclusions of the June 2018 ES. All elements of the June 2018 ES not covered in the ES Addendum are considered to remain valid.
- 14 The EIA specialists who contributed to the June 2018 ES have reviewed the Proposed Amendments and Amended Proposed Development as a whole and its potential to generate any materially new or different environmental effects or changes to the conclusions of the June 2018 ES.
- 15 Consideration has been given to the validity of baseline data and policy updates since June 2018, as appropriate.
- 16 With regards to national planning policy, whilst the June 2018 ES considered the Draft Revised NPPF¹, this has now been published and the ES Addendum has taken into account of the 2018 updated NPPF², along with the 2019 update to the NPPF³, which sets out the Government's economic, environmental and social planning policies for England.
- 17 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 confirming this has been provided for the relevant assessment within the ES Addendum. The whole of the relevant June 2018 assessment has been taken into consideration within the statements of conformity, and these should be read in conjunction with the corresponding June 2018 ES Chapters. 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; and
 - ES Volume 1, Chapter 11: Wind Microclimate.
- 18 Where changes are considered to impact on the assessment previously undertaken and potentially affect the reported environmental effects and conclusions of the ES Chapter, a full replacement assessment and ES Chapter has been undertaken for the Amended Proposed Development. This has been undertaken for:
 - ES Volume 1 Chapter 6: Socio Economics; and
 - ES Volume 1 Chapter 10: Daylight, Sunlight, Overshadowing and Solar Glare.
- 19 These ES Addendum Chapters supersede the relevant ES Chapters in the June 2018 ES.
- 20 The Townscape, Visual and Heritage Impact Assessment (TVHIA) presented in the June 2018 ES has been reviewed along with all Accurate Visual Representations (AVRs) of the Proposed Development. Where it has been considered that the Proposed Amendments would be potentially visible, updated AVRs have been undertaken, with the addition of updated wirelines and renders of the Amendment Proposed Development as a whole where relevant, and presented in the form of a TVHIA Addendum (ES Addendum Volume 2, TVHIA Addendum).
- 21 In addition to a review of Volumes 1 and 2 of the June 2018 ES, the Technical Appendices (Volume 3) have also been taken into consideration, and where relevant appendices have been updated in line with the Proposed Amendments.

¹ DCLG, 2018; 'Draft Revised National Planning Policy Framework, March 2018

² DCLG, 2018; National Planning Policy Framework, 2018.

³ DCLG, 2019; National Planning Policy Framework, 2019.

ENVIRONMENTAL IMPACT ASSESSMENT – CONSIDERATION OF THE PROPOSED AMENDMENTS AND THE AMENDED PROPOSED DEVELOPMENT

- 22 The following sections of this NTS Addendum present a topic by topic review of the implications of the Proposed Amendments and the Amended Proposed Development on the June 2018 ES. Further details can be found within the Environmental Statement Addendum (Volumes 1 and 2).

Socio Economics

- 23 The socio economic assessment was updated to assess the socio economic effects of the Proposed Amendments and Amended Proposed Development as a whole. The updated assessment focused on the effects related to net employment generation, loss of existing employment, housing delivery, new residential population (i.e. demand for social infrastructure (including health, education, open space, and playspace)) and indirect economic benefits.

Demolition and Construction

- 24 Given that there are no changes to the demolition and construction programme, and no material changes to the demolition and construction activities, no changes occur to the demolition and construction socio economic effects stated with the June 2018 Socio Economic ES Chapter.

Completed Development

- 25 The Proposed Amendments focus on the increase in residential units. No changes occur to the amount of hotel rooms and serviced apartments, therefore, there are no changes to the residual effects on the local economy and residents.
- 26 The Amended Proposed Development would make a positive contribution towards the London Plan's target of the delivery of 7,330 new homes (and draft London Plan target of 4,880 new homes) within RBKC. The Amended Proposed Development would deliver 62 new homes, the effect would remain as stated in the June 2018 ES, direct, permanent, **minor beneficial** (and not significant) at the local and borough level; and **negligible** (and not significant) at the regional level.
- 27 New residential dwellings and the resulting population could have implications on existing social infrastructure capacity. From a review of baseline information, there is sufficient surplus capacity available in terms of education, health and open space within the local area, therefore the effect on the demand for education and healthcare social infrastructure would be **negligible**. The Amended Proposed Development will provide and exceed the required level of playspace which would lead to a **minor beneficial** effect on playspace provision at the site level and a **negligible** effect at all other spatial scales.
- 28 No significant adverse effects have been identified. Spending by new residents, employees and guests accommodated by the Amended Proposed Development are considered to be **significant moderate beneficial** effects at the local level.
- 29 No changes to the socio economic residual effects stated within the June 2018 Socio Economic ES Chapter occur due to the Proposed Amendments.

Traffic and Transport

- 30 The June 2018 Traffic and Transport assessment was reviewed in the context of the Proposed Amends and the Amended Proposed Development.
- 31 The assessment methodology, baseline conditions and identified receptors all remain valid and as presented in the June 2018 Traffic and Transport ES Chapter.

Demolition and Construction

- 32 There have been no material changes to the demolition and construction works as presented within the June 2018 ES, therefore, the traffic and transport residual effects relating to demolition and construction

works would remain as stated within the June 2018 Traffic and Transport ES Chapter.

Completed Development

- 33 The Proposed Amendments includes an increase in the total number of residential dwellings from 46 to 62, with all units becoming affordable rent which has led to an increased number of cycling parking from 130 to 164 long stay spaces in line with the New Draft London Plan cycle standards.
- 34 The increase in residential units has also led to an increase in residential associated trips with numbers increasing at AM peak hour by 10 additional trips and PM peak hours by 6 additional trips. Increased residential numbers has also led to 3 additional waste storage bins.
- 35 With the mitigation adopted in the June 2018 Traffic and Transport ES Chapter there will be no change to the identified effects, with no adverse significant effects, but a significant beneficial effect 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.
- 36 When considering the Proposed Amendments and Amended Proposed Development as a whole, they do not alter the residual effects and conclusions of the June 2018 Traffic and Transport ES Chapter.

Noise and Vibration

- 37 The June 2018 Noise and Vibration assessment was reviewed in the context of the Proposed Amends and the Amended Proposed Development.
- 38 The assessment methodology, baseline conditions and identified receptors all remain valid and as presented in the June 2018 Noise and Vibration ES Chapter.

Demolition and Construction

- 39 There have been no material changes to the demolition and construction works as presented within the June 2018 ES. The noise and vibration residual effects associated with demolition and construction will therefore remain as stated within the June 2018 Noise and Vibration ES Chapter.

Completed Development

- 40 The Proposed Amendments, which include the addition of two storeys of residential dwellings on top of the podium and very small changes in average daily traffic flows, would have no material implication upon the likely significant noise and vibration effects of the Completed Amended Proposed Development.
- 41 All mitigation measures as stated within the June 2018 Noise and Vibration ES Chapter remain applicable and valid. With the mitigation measures adopted, there are anticipated to be no likely significant effects relating to noise and vibration as a result of the Amended Proposed Development.
- 42 When considering the Proposed Amendments and Amended Proposed Development as a whole, they do not alter the residual effects and conclusions of the June 2018 Noise and Vibration ES Chapter.

Air Quality

- 43 The June 2018 Air Quality assessment was reviewed in the context of the Proposed Amends and the Amended Proposed Development.
- 44 The assessment methodology, baseline conditions and identified receptors all remain valid and as presented in the June 2018 Air Quality ES Chapter. Qualitative consideration has been given to the impacts at locations where receptor heights and façade locations have changed with the proposed two additional storeys of residential dwellings on top of the podium.

Demolition and Construction

- 45 There have been no material changes to the demolition and construction works as presented within the June 2018 ES. The Proposed Amendments will result in a slightly larger construction volume from the additional two storeys. However, the emissions magnitude for the construction works was identified as being 'Large' in the June 2018 ES, and this would not change in light of the Proposed Amendments nor would there be an increase in the projected construction traffic flows. There is no need for any additional mitigation measures other than those outlined within the June 2018 Air Quality ES Chapter, which when

applied any impacts during the construction period will be classed as 'not significant'.

- 46 The likely significant air quality effects associated with demolition and construction will therefore remain as stated within the June 2018 Air Quality ES Chapter.

Completed Development

- 47 The energy plant within the Amended Proposed Development will not change compared to that assessed in the June 2018 ES. The trip generation of the Amended Proposed Development on local roads will increase by a very small amount as a result of the Proposed Amendments. Taking this into account, there will be no changes to the impacts and effects predicted at existing receptors in the local area as presented in the June 2018 ES. The effects of the Amended Proposed Development will remain negligible at all existing receptors.
- 48 With regards to site suitability, the southern façade being 750mm closer to the kerb of the road will result in residential receptors at this façade experiencing slightly higher contributions from traffic emissions on Courtfield Road. However, the modelled concentrations at the residential properties on this façade from the June 2018 Air Quality ES Chapter were all well below the relevant air quality objectives.
- 49 Residents of the additional new apartments on 8th and 9th floors will be well away from road traffic emissions (over 27m above road level) and can expect to experience concentrations close to background levels, which will be well below the objective by the opening year. The June 2018 Air Quality ES Chapter demonstrated that air quality will be acceptable for all residential units within the Proposed Development and this remains valid for the Amended Proposed Development.
- 50 The Amended Proposed Development remains better than air quality neutral in terms of building and transport emissions.

Daylight, Sunlight, Overshadowing and Solar Glare

- 51 The Daylight, Sunlight, Overshadowing and Solar Glare (DSO & SG) assessment was updated to assess the DSO & SG effects of the Proposed Amendments and Amended Proposed Development as a whole. The updated assessment focused on the effects related to the increase of 2 additional storeys on top of the podium and the effects on daylight and sunlight amenity and solar glare.

Demolition and Construction

- 52 Effects in relation to DSO during demolition and construction would vary throughout the demolition and construction phase, however, they would certainly be less than the effects of the completed Amended Proposed Development. Any effects during demolition and construction would be similar or less than those of the completed Amended Proposed Development.

Completed Development

- 53 The Amended Proposed Development would result in loss of daylight and sunlight amenity at several receptor locations. A majority of surrounding receptor properties would experience **negligible to minor adverse effects**, however effects resulting in significant **moderate adverse** effects would occur to five properties (albeit the effects to these properties range and are not just moderate adverse, as rooms within each property experience between negligible to moderate adverse effects) comprising: 15-15A Courtfield Rd & 25 Ashburn Place (**negligible to moderate adverse**); 17 - 19 Courtfield Road (**negligible to moderate adverse**); 9 Ashburn Gardens (**negligible to moderate adverse**); 8 Ashburn Gardens (**negligible to moderate adverse**) and 7 Ashburn Gardens (**negligible to moderate adverse**).
- 54 There are no changes caused by the Proposed Amendments to the effects relating to overshadowing on existing amenity spaces.
- 55 Taking into consideration the Proposed Amendments one new, additional significant effect occurs in relation to instances of solar glare. There remain two significant **moderate adverse** effects from View 1. road users along Grenville Place moving south and View 2 road users on Cromwell Road travelling from east to west, the additional **moderate adverse** effect is View 5. Courtfield Road looking east.
- 56 Glazing at the lower levels of the building will be treated to ensure that these areas are less reflective. This can be achieved by the special coating of or fritting of the glazing panels or the application of fins to lessen the intensity of the instances of glare.

Wind Microclimate

- 57 The June 2018 Wind Microclimate assessment was reviewed in the context of the Proposed Amends and the Amended Proposed Development.
- 58 The assessment methodology, baseline conditions and identified receptors all remain valid and as presented in the June 2018 Wind Microclimate ES Chapter.
- 59 The assessment of the likely wind microclimate changes due to the Proposed Amendments are based on the results of the June 2018 wind assessment and experience, knowledge and professional judgement of wind flow in the built environment.

Demolition and Construction

- 60 There have been no material changes to the demolition and construction works as presented within the June 2018 ES. The wind microclimate residual effects associated with demolition and construction will therefore remain as stated within the June 2018 Wind Microclimate ES Chapter.

Completed Development

- 61 No additional effects have been identified resulting from the Proposed Amendments. The changes to the Proposed Development are insignificant in regard to the overall massing of the building and are therefore not expected to cause a change in the wind conditions presented within the June 2018 Wind Microclimate ES Chapter.
- 62 The new proposed balconies will have side screens with a solid balustrade, which will provide sufficient shelter to occupants. Furthermore, these balconies are located at the lower levels of the Amended Proposed Development where suitable wind conditions are expected.
- 63 There are no significant effects resulting from the Proposed Amendments and Amended Proposed Development.
- 64 When considering the Proposed Amendments and Amended Proposed Development as a whole, they do not alter the residual effects and conclusions of the June 2018 Wind Microclimate ES Chapter.

Townscape, Visual and Heritage

- 65 The June 2018 Townscape, Visual and Heritage Impact Assessment (TVHIA) was reviewed in the context of the Proposed Amends and the Amended Proposed Development. The TVIA Addendum (ES Addendum Volume 2) assesses the potential impacts and likely effects of the Amended Proposed Development on views, townscape and above-ground heritage assets.
- 66 A total of 21 views provided in the June 2018 ES (out of a total of 37) have been updated to reflect the amended design. These updated views were selected on the basis that they are the views in which the changes to the design of the Amended Proposed Development compared to that of the submitted Proposed Development may be visible to a noticeable extent.

Demolition and Construction

- 67 There have been no material changes to the demolition and construction works as presented within the June 2018 ES. The townscape, visual and heritage residual effects associated with demolition and construction will therefore remain as stated within the June 2018 TVHIA.

Completed Development

- 68 The Proposed Amendments are minor in respect of the change that would result in the massing and appearance of the Amended Proposed Development. The assessment of the June 2018 TVHIA concerning the design quality of the submitted Proposed Development – in summary, that it would be of a high architectural quality, would provide a number of urban design benefits and would represent a substantial improvement on the current conditions on the site – would remain valid for the Amended Proposed Development.
- 69 The revised views demonstrate that in many cases, there would be no change or a barely discernible change to the view in question as a result of the revisions to the Amended Proposed Development. In those views in which the revisions would change the appearance of the Amended Proposed Development - most notably as a result of the two storey addition to the top of the podium and changes

to the elevations of the residential component - this would not be to such an extent as to alter any of the assessments of the magnitude of change that were previously provided in the June 2018 ES, and consequently the significance of effects. Similarly, the qualitative nature of the effects in each view would remain unchanged as a result of the Proposed Amendments.

- 70 The extent and nature of the changes to the design are not sufficiently great as to alter the overall effect of the Amended Proposed Development in respect of townscape character areas or built heritage assets, as set out in the June 2018 ES.

CLIMATE CHANGE

- 71 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. The predicted future climate change, and effects on developments, does not change from that presented in the June 2018 ES. 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.

The Impact of the Proposed Development on Climate Change – Greenhouse Gas Emissions

- 72 Principles on climate change mitigation and Environmental Impact Assessment identify climate change as one of the defining environmental policy drivers of the future, and that action to address greenhouse gas emissions (primarily Carbon Dioxide) is essential.
- 73 The Institute of Environmental Management and Assessment recommend that all greenhouse gas emissions, including any residual emissions following adoption of any mitigation measures, are to be determined as significant.
- 74 The Proposed Amendments and Amended Proposed Development do not significantly alter the effects presented with the June 2018 ES Greenhouse Gas Emissions Assessment. When compared with predicted emissions from the RBKC and the GLA respectively, the Amended Proposed Development as a percentage of these does not change from that presented in the June 2018 ES.
- 75 Mitigation has been provided to avoid, reduce and offset the Amended Proposed Development's Carbon Dioxide emissions, which follows the key principles of greenhouse gas mitigation in the Institute of Environmental Management and Assessment guidance and is consistent with the requirements of relevant policy.

EFFECT INTERACTIONS AND CUMULATIVE EFFECTS

- 76 No new or additional cumulative schemes within the thresholds presented in the June 2018 ES have come forward and therefore no additional cumulative schemes have been considered within this ES Addendum.
- 77 No change from the cumulative effects as presented within the June 2018 ES occur as a result of the Proposed Amendments.

SUMMARY AND CONCLUSION

Summary

- 78 When taking into consideration ES Chapters 6 to 11 of ES Addendum Volume 1 and ES Addendum Volume 2 Townscape, Visual and Heritage Impact Assessment Addendum, no additional effects interactions are likely to occur from the Proposed Amendments and Amended Proposed Development as a whole. Therefore, Chapter 12: Effects Interactions of the June 2018 ES remains valid.
- 79 A majority of the likely significant effects as presented in the June 2018 ES remain valid. The changes to these residual effects due to the Proposed Amendments comprise:
- Daylight and sunlight amenity to 15-15A Courtfield Rd & 25 Ashburn Place (**negligible to moderate adverse**);

- Daylight and sunlight amenity to 17 - 19 Courtfield Road (**negligible to moderate adverse**);
- Daylight and sunlight amenity to 9 Ashburn Gardens (**negligible to moderate adverse**);
- Daylight and sunlight amenity to 8 Ashburn Gardens (**negligible to moderate adverse**); and
- Daylight and sunlight amenity to 7 Ashburn Gardens (**negligible to moderate adverse**).

80 In addition, one additional significant effect occurs in relation to solar glare, with a **moderate adverse** effect experienced at Viewpoint 5. Courtfield Road looking east.

81 No new or additional mitigation has been identified or is required due to the Proposed Amendments, with the exception of the significant adverse effect of solar glare at Viewpoint 5, mitigation proposed to reduce solar glare of the facades in the June 2018 ES remain valid and applicable for this likely significant effect. Therefore, the mitigation and monitoring schedule as presented within the June 2018 ES remains valid.

Conclusion

82 This ES Addendum has considered whether the Proposed Amendments are likely to give rise to any material changes to the June 2018 ES, or if any new or materially different significant environmental and socio economic effects will arise as a result of the Amended Proposed Development.

83 The Proposed Amendments, as shown in this ES Addendum, do not materially change the outcomes and conclusions of the June 2018 ES and the Amendment Proposed Development, the only change to significant effects occurs in relation to daylight and sunlight amenity, to an additional five receptors and solar glare to one additional viewpoint.

84 The topic specific assessments have shown that apart from daylight and sunlight and solar glare effects, no new or altered effects, whether significant or not, occur due to the Proposed Amendments.

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