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Dear Mr Murphy,

Town and Country Planning (Environmental Impact Assessment) Regulations 2011
S73 Planning Application for Brent Cross Cricklewood Regeneration Area
Request for a Scoping Opinion

Enclosed is a response to your request for a scoping opinion for an Environmental Statement to support the S73 Application at Brent Cross Cricklewood of 12 July 2013 together with the accompanying Scoping Report.

The attached Scoping Review checklist has been used to review the scoping report: this has been completed for general chapters and also for each specialist topic. It identifies recommendations for inclusion in the Environmental Statement.

It is considered subject to the specific comments outlined in this letter and the checklist, that the proposed scope of the EIA is acceptable.

1. Screening Opinion

The Council agrees that the development is a Schedule 2 10(b) infrastructure project, and due to its size that an EIA would be required.

2. Request for further clarification

There are a number of issues that require further clarification. We request that you respond to these within the ES and related documentation:

- The full scope for the noise and air quality assessments will not be established until the initial traffic assessment is completed. These scopes will be agreed with the Council on receipt of the transport data.
- The full scope for protected species surveys and updates to previous surveys undertaken needs to be established following the completion of the Phase 1 report. This report should be submitted along with confirmation of any further surveys to be undertaken.
- Please also confirm the form of the bat surveys, currently noted in the scoping report as three dawn surveys, should this be three dusk and dawn surveys? If not, please explain clearly why not.
- Please confirm the date of the last tree survey and if appropriate update the survey for those areas where trees are to be retained.

- Please provide a comprehensive list of the committed schemes you will be considering in the cumulative impact assessment.
- Please confirm whether the Ground Investigations can be prioritised for completion in the area of the proposed river realignment in advance of the completion of the EIA. In the absence of this please confirm the existing ground investigation information and desk based assessment provide sufficient information to make a fully informed assessment of impact in relation to the proposed river realignment.

3. General Comments

The following provides a summary of our response to the Scoping Report circulated in July 2013. It should be read in conjunction with the detailed scoping review checklist appended to this letter.

3.1 Legislative Requirements of the Environmental Statement

The ES needs to include all relevant and necessary information as outlined in Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011. Of particular importance to this scheme are:

- A description of the development, including in particular:-
 - a) A description of the physical characteristics of the whole development and the land-use requirements during the construction and operational phases;
 - b) A description of the main characteristics of the production processes, for instance, nature and quantity of the materials used; and
 - c) An estimate, by type and quantity, of expected residue and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc) resulting from the operation of the proposed development.
- An outline of the main alternatives studied by the applicant and an indication of the main reasons for the choice made, taking into account the environmental effects – this will include the scheme as permitted in 2010;
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development; the use of natural resources; and the emissions from pollutants, the creation of nuisances and the elimination of waste.
- A description of the measures envisaged to prevent, reduce and where possible offset and significant adverse effects on the environment.
- A non-technical summary of information
- An indication of any difficulties (technical deficiencies or lack of knowledge) encountered while compiling the required information.

3.2 Wider content of the submitted Scoping Report

The description of the changes being assessed in the S73 should include any changes to the assumed phasing delivery of use classes, for example retail being delivered in one single phase. The individual assessments should be explicit in their assessment of these changes to the phasing.

An update assessment of retail impacts will be covered within the specific Retail Impact Assessment to be submitted as part of the planning application. However the Environmental Statement should also report potential impacts in either the land use or socio economic section.

3.3 Cumulative impact and committed development

The assessment should also include the cumulative effect of the development with other relevant existing or proposed development in the area. The cumulative impact assessment should include proposals currently at planning and scoping stage.

For general baseline information for the ES the Council recommend that you refer to the following documents:

Council's Local Development Framework Annual Monitoring Report 2010/11
http://www.barnet.gov.uk/download/downloads/id/549/annual_monitoring_report-201011

Core Strategy and Site Allocations Development Plan Document, Sustainability Appraisal Scoping Report, June 2008
http://www.barnet.gov.uk/download/downloads/id/924/dm_submission_docs-sustainability_appraisal_scoping_report

Information on housing need is available in the North London Strategic Housing Market Assessment (SHMA) 2009/10
http://www.barnet.gov.uk/download/downloads/id/2076/shma_assessment_dec_2011

The following link will take you to Barnet's LDF evidence and supporting documents
http://www.barnet.gov.uk/downloads/940160/ldf_evidence_and_supporting_documents

4. Consultee comments

Comments from consultees who have responded are included in this response. Any other comments received from consultees will be forwarded.

Highways Agency

- Statement of compliance that the ES has been prepared in accordance with the requirements of the DMRB in relation to any works affecting the Strategic Road Network,
- HA Environmental System (Envis) should be used as a source of information on man-made and natural assets in the area surrounding the SRN.
- Landscape and Visual to refer to M1/A406/A5 Junction Improvement
- Need for more recent Ecological Survey than 2006 (see HA full comments)

Environment Agency

- Use WFD Annual Status Report as input to the water environment baseline
- Confirm use of SUDS
- Confirm ES to assess changes to the gradient and platform of the river (which now will have reduced sinuosity) and effect on optimising flow.
- Include impact to the existing river corridor which is an important link to the Brent Reservoir SSSI
- Confirm will assess impact on aligning the river adjacent to the A406 and potential for detrimental impact on wildlife and amenity uses.
- Demonstrate positive improvements to the SSSI
- ES to include an impact assessment following additional ground surveys of the area of the proposed river realignment.

TfL

- A number of changes to the parameter plans are proposed (see TfL full comments)
- Confirm when the resurfacing of the A406 to reduce noise is required as well as the extent and specification of the resurfacing.
- Confirm how the revised floor risk assessment impacts on TfLs ability to maintain the highway and operate local bus services.
- Demonstrate that the air quality within the bus station is acceptable for both passengers and staff.
- Long term air quality monitoring should be considered as mitigation.
- If the construction access points have varied from the consented scheme then it would be expected that appropriate mitigation is identified.
- Micro-climate assessment should consider the changes in layout including the living bridge and new bus station layout.
- ES should demonstrate how retailers will achieve a reduction in carbon emissions from their transport fleet.

English Heritage

- Clarification on the approach to archaeological assessment, including the potential need to undertake some form of field evaluation as part of the Environmental Statement

Thames Water

- The EIA should consider the developments demand for water supply and network infrastructure both on and off site and whether it can be met
- The EIA should consider the demand for sewage treatment and network infrastructure both on and off site and whether it can be met.
- The EIA should consider surface water drainage requirements and flood risk of the development both on and off site and whether it can be met
- The EIA should consider any piling methodology and its potential to adversely affect neighbouring utility services.

London Borough of Brent

Concern is raised that the transportation information has not been updated to take account of more recent assessments carried out. In particular, whilst the scoping opinion makes reference to the Section 106 agreement signed in October 2010, there are several other pieces of work which should now also be considered and will inform the proposed changes including:

- Detailed Design Model (DDM) and the A5 Corridor Study. The A5 Corridor Study was scoped out in 2010, but was never actually started, but is about to be undertaken now, along with an upgrade to the portion of the TfL NoLHAM (North London Highway Assignment Model) for this area.
- A series of traffic surveys were undertaken in June/July 2013 and these should be fed into the assessment.

It is considered that without reference made to these pieces of work, the scope of information to be included in the Environmental Statement would be inadequate.

We hope that this opinion is of assistance in preparing the necessary Environmental Statement but would advise that, under the provisions of paragraph 13(9) of Part IV of the EIA regulations, the adoption of a Scoping Opinion shall not preclude the Local Planning Authority from requiring additional information in connection with any statement that may be submitted as an Environmental Statement in connection with any application for planning permission for the same development as has been referred to in the request for the opinion.

The Scoping request and this Scoping Opinion will be placed on the public register and shall remain available for two years.

If you have any queries please do not hesitate to contact me.

Regards,

Martin Cowie
Interim Assistant Director of Strategic Planning, Regeneration and Transport

DRAFT

Project: **Brent Cross Cricklewood**

Job No:

Subject: **Scoping Review Table**

Date:

18th August 2013

1. Legal compliance (Town and Country Planning EIA Regulations)

Review criteria	Review comments	Recommendations
Regulation 13(2) sets out the documents required to be submitted when making a scoping opinion request in relation to an application for planning permission:		
(i) a plan sufficient to identify the land;	<ul style="list-style-type: none"> A plan showing the consented layout and proposed layout is supplied in Chapter 1. 	<ul style="list-style-type: none"> None.
(ii) a brief description of the nature and purpose of the development and of its possible effects on the environment; and	<ul style="list-style-type: none"> Background of the scheme is provided in Chapter 1.1. Changes to the consented scheme are described in Chapter 1.4. It is stated that <i>“In order to preserve the hydrological, ecological and social benefits provided by the eastern and western watercourse section realignments, no changes to the consented plans will be made in these areas....”</i> A brief description of assessment conclusions is provided within the introductory chapter. 	<ul style="list-style-type: none"> None.
(iii) such other information or representations as the person making the request may wish to provide or make;	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None.
Regulation 13(6) states that before adopting a scoping opinion the authority shall take into account:		

Review criteria	Review comments	Recommendations
(a) the specific characteristics of the particular development;	<ul style="list-style-type: none"> Chapter 1 and Table 1.1 provide a project description and summary of changes to the consented scheme. It has been noted in Section 1.4.5 that there will be a need to update the ICP in light of the proposed changes to the Masterplan and provide the Brent Cross east zone development. It has been stated in the scoping report that the potential effects of the proposed phasing changes have been reviewed and this will need to be developed further in the ES. 	<ul style="list-style-type: none"> None.
(b) the specific characteristics of development of the type concerned; and		
(c) the environmental features likely to be affected by the development.	<ul style="list-style-type: none"> Table 3.1 summarises which chapters will be updated in light of the consented scheme. 	<ul style="list-style-type: none"> Table 3.1 could summarise the key points in respect of any changes to environmental receptors.

2. Information provided on the project site

Review criteria	Review comments	Recommendations
Maps and photographs showing the location of the project relative to surrounding physical, natural and man-made features	<ul style="list-style-type: none"> Maps are provided in Chapter 1; however the work in progress box requires updating. Table 1.1 provides a detailed summary of the identified changes required to the Parameter Plans. There is no consideration given to potential future developments and changes in land use adjacent to the site. A subsequent list of schemes for consideration in the cumulative impacts 	<ul style="list-style-type: none"> None There is reference to temporal scope taking account of future developments.
Existing land-uses on and adjacent to the site and any future planned land uses		
Zoning or land-use policies		
Protected areas or features		

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Review criteria	Review comments	Recommendations
Sensitive areas	assessment has been provided.	
Details of any alternative locations which have been considered	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A

3. Information provided on the proposed development

Review criteria	Review comments	Recommendations
Brief description of the proposed project.	<ul style="list-style-type: none"> Background of the scheme is provided in Chapter 1.1. Changes to the consented scheme are described in Chapter 1.4. 	<ul style="list-style-type: none"> None.
Reasons for proposing the project.	<ul style="list-style-type: none"> Reasons for S73 have been explained. 	<ul style="list-style-type: none"> None.
A plan showing the boundary of the development including any land required temporarily during construction.	<ul style="list-style-type: none"> The figure in Chapter 1 shows the boundary of development. It is not stated whether this includes any land required temporarily during construction, for landscaping and any mitigation or enhancement areas. 	<ul style="list-style-type: none"> Confirm that the figure in Chapter 1 includes all land required for the proposed scheme, including land required temporarily during construction, for landscaping and any mitigation or enhancement areas and including highways or other transport infrastructure land.

Review criteria	Review comments	Recommendations
<p>The physical form of the development (layout, buildings, other structures, construction materials, etc).</p>	<ul style="list-style-type: none"> Chapter 1.4 Scheme Changes describes the physical form of the amendments to the consented scheme including the living bridge, River Brent realignment, Brent Cross West, Market Quarter and Brent Terrace and Eastern Lands at a high level. A map showing the physical layout of the scheme is provided in Chapter 1; however the work in progress box requires updating. Table 1.1 provides description of the changes to the Parameter Plans. 	<ul style="list-style-type: none"> Provide text, where available, of building massing, construction materials to be used etc. Identify where there are gaps and uncertainties so that they can be taken into account when determining the scope of the EIA. In areas where public realm is being provided in a three-dimensional form or within buildings, an indication of how these spaces will be made accessible to the public (including any access restrictions), as well as arrangements for management, maintenance, repair and security. This specifically includes the new bus station, the Brent Cross Main Square and the Living Bridge.
<p>Description of the main processes including size, capacity, throughput, input and output.</p>	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A
<p>Any new access arrangements or changes to existing road layout.</p>	<ul style="list-style-type: none"> Information is not specified as to the detailed changes to access arrangements or road layouts at this stage; however pedestrian access is given a good level of description. A summary of the key changes to the road network would be a useful addition under the respective sections of Section 1.4. 	<ul style="list-style-type: none"> None.

Review criteria	Review comments	Recommendations
A work programme for construction, operation and commissioning phases, and restoration and after-use where appropriate.	<ul style="list-style-type: none"> Section 1.4.5 provides a basic outline of the key construction programme dates and includes text acknowledging that <i>“it was not possible to provide an exact assessment of when some of the later stages in the Scheme will actually take place...”</i> 	<ul style="list-style-type: none"> None.
Resources used in construction and operation (materials, waste, energy, etc.)	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A
The relationship with other existing/planned projects.	<ul style="list-style-type: none"> There is no discussion of the development in context of other projects/developments in the vicinity. 	<ul style="list-style-type: none"> A paragraph of text placing this amended scheme in context of other nearby developments occurring in the same time window would be a useful addition.
Information about alternatives being considered.	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A
Information about mitigating measures which are being considered	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A
Other activities which may be required as a consequence of the project (e.g. new roads, extraction of aggregate, provision of new water supply, generation or transmission of power, increased housing and sewage disposal).	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A
Details of any other permits required for the project.	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A

4. Consultation

Review criteria	Review comments	Recommendations
The description should include details of consultation with appropriate statutory and non-statutory consultees, including the public. This should identify those parties consulted and provide a summary of their responses.	<ul style="list-style-type: none"> Chapter 2.4 incorporates details of consultation including the bodies to be consulted and how the consultation will be carried out. 	<ul style="list-style-type: none"> None.

5. The proposed approach to EIA

Review criteria	Review comments	Recommendations
The scoping process should identify those aspects of the environment that are likely to be significantly affected by the development (including in particular, population, fauna, flora, geology and soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the inter-relationship between the above factors).	<ul style="list-style-type: none"> Chapter 3 covers the majority of topic areas which would be expected. These are the same topics that were covered in the previous assessment. Section 2.2 states that “...<i>the methodology and significance criteria applied will be exactly the same as those used in the updated RES.</i>” The potential magnitude of changes to impacts receptors is not discussed anywhere in the scoping report. 	<ul style="list-style-type: none"> None.

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6. Technical topics

6a Land Use

This Chapter does not provide much detail of the scoping process in regards to Land Use as would be expected for a S73 application, but summarises briefly the spatial scope of the assessment in light of changes to the scheme. It identifies relevant policy and any local policy not mentioned under this section will be picked up by the individual theme leads. No other aspects are covered in the chapter. Consequently, we have no comments or recommendations to make on this chapter.

Traffic and Transport

General:

The S73 Transport Assessment has already been scoped and the proposed general technical scope and methodology agree in principle by LBB and TFL officers as part of pre-application liaison with the Developers and their Consultants. The Council has the following queries in relation to specific points in the Final Version of the EIA Scoping Report, dated 11th July 2013.

Key elements of the scheme:

The S73 proposals include the provision of a new bridge 'B7'. Clarification is required as to the nature of permitted access to the bridge beyond that for pedestrians. The report refers to 'managed cycle use' on page 2 and this need explaining and clarifying.

ICP and Phasing:

On page 9/10 of the report it states that under the 2010 consented scheme the main transport infrastructure was to be delivered in phase 1. This is incorrect, as significant transport schemes, such as the new M1/A406/A5 junction improvement were programmed in phase 2, and in other later phases. However, the comments about the current programme are more correct with the above highway scheme now being proposed as part of phase 1A.

Parameter Plan 007 Maximum Building and Frontage Heights:

The S73 proposals illustrated in Fig no. 1.8 include summary text changes that refer to height parameter on bridge B7. It needs to be clarified as to whether the s73 application is seeking permission for any retail units on bridge B7 as this will have implications for servicing and delivery arrangements as well as the Zonal Development Floorspace distribution and global totals as permitted under the 2010 permission.

Parameter Plan 013 Transport Interchanges:

The suggested revised plan for the new bus station, T1, as shown in Fig no. 1.14 includes bus circulation arrangements that need to be clarified as they appear to be different to those previously agreed at meetings attended by Council officers.

S73 Assessment and Methodology:

The report states on page 46 that an operational analysis of the impacts of the S73 scheme proposals on queuing will be undertaken, and refers to the A406. Other strategic roads and gateway junctions will also need to be checked, such as the A41 and the M1.

A bullet point list of documents to be updated is provided. It is considered that the Design Guidelines should be added to the list.

Recommendation:

The transport and highway aspects of the EIA Scoping Report are acceptable, subject to the minor points of clarification set out above.

6c Socio-economics

Review criteria	Review comments	Recommendations
<p>Has adequate baseline information been provided to identify potential environmental effects?</p>	<ul style="list-style-type: none"> • The Scoping document states: • There are a number of aspects of the RES baseline that will be updated as new statistics have been released since the RES chapter was written. This includes updates to the Annual Business Inquiry 2004, claimant count, population forecasts and crime figures. • <i>This update should make use of the most recent Census release information for AHS and age ranges, and information from LBB on changes in the number of pre-school and primary school children over and above that which was assumed at the time that the RES was undertaken.</i> • The Scoping document states: • Updates have been made to national planning policy as well as to regional policy, including Planning Policy Statement 4 Planning for Sustainable Economic Growth (2009), Draft London Plan (2009), London Economic Development Strategy (2010) and the Greater London Authority, Supplementary Planning Guidance on children’s play space provision (2008). Updating the policy background is unlikely to give rise to materially different significant impacts from those identified in the RES in 2009. • <i>This should also take into account LBB SPD Guidance on Planning Obligations April 2013 (N.B Appendix 1 for child yield assumptions). This will have a significant impact on the methodology previously used to generate school place demands.</i> 	<ul style="list-style-type: none"> •

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File Note



Review criteria	Review comments	Recommendations
Has adequate consultation has taken place to date?		•
Have all potential sources of impact and resulting environmental effects been identified?		•
Have potential impacts or effects been scoped out and is justification given for this?		•
Has the temporal and spatial scope been identified?		•
Are the methods proposed for baseline collection appropriate to the needs?		•

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Review criteria	Review comments	Recommendations
<p>Are the proposed methods of assessment robust and transparent?</p>	<ul style="list-style-type: none"> • The Scoping document states: • Assessment of education need based on information from the capacity of local schools and compared to the population estimates for the Scheme in order to anticipate the impact on local schools. This methodology was been agreed with the LB Barnet, as Local Education Authority (LEA) as part of the RES; • <i>Please note that this methodology can no longer be relied upon. Any justification for discounting needs based on capacity in the wider education estate will need to be clearly evidenced using a) Up-to-date analysis of spare places, b) analysis of the age-groups of spare places and c) advice from LBB on the availability of spare places. Please note that advice provided to the West Hendon application indicates that there are no spare places which can be assumed towards meeting the needs arising from that scheme.</i> 	<ul style="list-style-type: none"> •
<p>Is the built-in mitigation suggested appropriate?</p>	<ul style="list-style-type: none"> • The provision of social infrastructure was previously assessed jointly with LB Barnet and service providers through the production of health and community, cultural and leisure facilities studies as part of the development of the application. • The nature of health & community infrastructure delivery has changed significantly from that assumed at the time of the RES. The updated assessment will need to reconfirm the applicant's undertakings for the Estate Management Company to own, lease and manage all facilities excluding the LBB run facilities. 	<ul style="list-style-type: none"> •

6d Noise and Vibration

Review criteria	Review comments	Recommendations
Has adequate baseline information been provided to identify potential environmental effects?	<ul style="list-style-type: none"> Noise survey undertaken in 2006 to presumably a methodology agreed with LBB. It is not clear if any baseline vibration surveys were undertaken. 	<ul style="list-style-type: none"> Make it clearer in the text in the ES what baseline data is being relied on.
Has adequate consultation taken place to date?	<ul style="list-style-type: none"> Consultation undertaken with LBB in 2006. Not clear if it is intended to re-consult. 	<ul style="list-style-type: none"> Please state/confirm. It is not obvious in text.
Have all potential sources of impact and resulting environmental effects been identified?	<ul style="list-style-type: none"> Vibration is referred to with regard to construction, confirm whether operational vibration is to be scoped in or out. No mention is made to potential off-site impacts from construction and operational traffic. 	<ul style="list-style-type: none"> Make this clearer in the text.
Has the temporal and spatial scope been identified?	<ul style="list-style-type: none"> See above. 	<ul style="list-style-type: none">
Have potential impacts or effects been scoped out and is justification given for this?	<ul style="list-style-type: none"> See above comment regarding off-site impacts. 	<ul style="list-style-type: none">
Are the methods proposed for baseline collection appropriate to the needs?	<ul style="list-style-type: none"> It is stated that updated baseline noise surveys will be carried out, this is considered appropriate as the previous survey data is now 7 years old. However, It is not clear if any vibration surveys were undertaken. 	<ul style="list-style-type: none"> None
Are the proposed methods of assessment robust and transparent?	<ul style="list-style-type: none"> In general, yes. No mention is made of operational assessment scenarios, e.g. full build out year, intermediate years etc. Confirm noise prediction model is to 3-D and if possible provide the modelling package to be used. 	<ul style="list-style-type: none"> Confirm this in the ES.
Is the built-in mitigation suggested appropriate?	<ul style="list-style-type: none"> Details on operational mitigation too brief. 	<ul style="list-style-type: none"> Make this clearer in the text.

6e Landscape and Visual

Review criteria	Review comments	Recommendations
Has adequate baseline information been provided to identify potential environmental effects?	<ul style="list-style-type: none"> The scoping document refers to the baseline established in the RES and that it remains valid. 	<ul style="list-style-type: none"> Given that the baseline in the RES will be approximately 4 years old, it would be appropriate to update the baseline to reflect the current townscape and visual situation.
Has adequate consultation has taken place to date?	<ul style="list-style-type: none"> It doesn't appear that specific consultation regarding the L/TVIA has been undertaken. The scoping document does note in 2.4 that consultation with the statutory consultees will be carried out. 	<ul style="list-style-type: none"> None.
Have all potential sources of impact and resulting environmental effects been identified?	<ul style="list-style-type: none"> The scoping document notes that there is the potential for landscape, townscape and visual amenity affects during construction and upon completion. It considers that the effects are likely to be positive as previously identified in the RES. 	<ul style="list-style-type: none"> None.
Have potential impacts or effects been scoped out and is justification given for this?	<ul style="list-style-type: none"> Potential effects have not been scoped out. All landscape/townscape and visual effects will be considered. 	<ul style="list-style-type: none"> None.
Has the temporal and spatial scope been identified?	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> The L/TVIA should establish the spatial scope of the assessment at the outset, based on an understanding of theoretical visibility. Consideration of construction and operational effects will be required as well as assessment of any phasing of the development.

Review criteria	Review comments	Recommendations
Are the methods proposed for baseline collection appropriate to the needs?	<ul style="list-style-type: none"> • Methods for baseline collection are not identified other than stating that the baseline established in the RES will be used. 	<ul style="list-style-type: none"> • It would be appropriate to use a combination of desk based review and site appraisal to develop an understanding of the landscape/townscape and visual baseline resource.
Are the proposed methods of assessment robust and transparent?	<ul style="list-style-type: none"> • The scoping report has been updated to confirm that the L/TVIA will be undertaken in accordance with GLVIA3. • The scoping report doesn't indicate how the visual assessment will be conducted. For instance will the viewpoints identified in the RES form the basis of the visual assessment? 	<ul style="list-style-type: none"> • If block montages or other forms of visualisation were produced for the RES, these should be updated. • Confirmation on the cumulative developments that are to be considered in the L/TVIA will be required.
Is the built-in mitigation suggested appropriate?	<ul style="list-style-type: none"> • Mitigation measures to reduce the negative effects of the development will be developed during the assessment process. 	<ul style="list-style-type: none"> • None.

6f Ecology and Nature Conservation

Review criteria	Review comments	Recommendations
<p>Has adequate baseline information been provided to identify potential environmental effects?</p>	<p>The scoping report says that <i>“The ecological assessment was based on a set of surveys, mostly undertaken in 2006, which are considered robust for the purposes of an ES assessment. This conclusion is drawn on the basis that there was little of ecological interest found in 2006 and that there is little reason for the habitats to have changed and therefore the baseline is considered valid.”</i> I do not agree with this assertion it needs updated.</p> <p>Yet new bat surveys are proposed if there is potential for bats there must be semi-natural habitat within the zone of influence.</p> <p>After 7 years an updated ecology survey must be undertaken</p> <ul style="list-style-type: none"> The scoping report acknowledges that the <i>“proposed realignment of the River Brent and its riparian corridor to the south of its current course will need to be considered in an updated ecology and nature conservation assessment. The River Brent was identified as having a current lack of ecologically valuable habitat within the Scheme boundary”</i> but this was 7 years ago and therefore the baseline isn't considered valid. Even if only to influence the appropriate enhancements an update is required. 	<ul style="list-style-type: none"> Carrying out 3 dawn surveys is very unusual. Please confirm if it should refer to 3 dusk/dawn surveys. Update protected species surveys or state clearly that following the updated phase 1 habitat survey you have scoped them out of the assessment due to lack of suitable habitat, surveys from 2006 cannot be valid in 2013.

Review criteria	Review comments	Recommendations
Has adequate consultation has taken place to date?	<p>Statutory consultees covered but perhaps some NGOs? Trust could be considered?</p> <ul style="list-style-type: none"> Brent River Park Project Thames Rivers Trust 	<ul style="list-style-type: none"> The Ecology section only mentions consultation with the EA. Consult relevant statutory bodies including NGOs in relation to the work on the River Brent.
Have all potential sources of impact and resulting environmental effects been identified?	<ul style="list-style-type: none"> Only Bats and the River Brent are highlighted. 	<ul style="list-style-type: none"> Re-scope potential receptors and affects following the updated Phase 1 habitat survey.
Have potential impacts or effects been scoped out and is justification given for this?	<ul style="list-style-type: none"> They have scoped out everything except Bats and the River Brent without sufficient justification. 	<ul style="list-style-type: none"> As above.
Has the temporal and spatial scope been identified?	<ul style="list-style-type: none"> Temporal scope not within the Ecology section. Spatial broadly but not specifically. 	<ul style="list-style-type: none"> Ecological zone of influence should be defined following results of updated Phase 1 habitat survey
Are the methods proposed for baseline collection appropriate to the needs?	<ul style="list-style-type: none"> Not stated. 	<ul style="list-style-type: none"> Confirmation of the type of bat surveys undertaken are required, currently reported as 3 dawn surveys which does not follow best practice.
Are the proposed methods of assessment robust and transparent?	<ul style="list-style-type: none"> Not stated. 	<ul style="list-style-type: none"> See above.
Is the built-in mitigation suggested appropriate?	<ul style="list-style-type: none"> Not stated. 	<ul style="list-style-type: none"> Key mitigation should be in the ecology section of the scoping document. This is not explicitly stated and should be made more obvious.

6g Water Resources and Flood Risk

Review criteria	Review comments	Recommendations
<p>Has adequate baseline information been provided to identify potential environmental effects?</p>	<ul style="list-style-type: none"> Sufficient baseline information has been provided to make an assessment of the potential environmental impacts of the proposed changes. However, a better comparison drawing between the existing and proposed would have assisted this assessment. 	<p>Water environment baseline not currently adequate due to changes from the consented scheme as detailed in the original RES; however this has been noted in scoping report.</p> <p>As identified in the scoping report the following updates to the baseline are required –</p> <ul style="list-style-type: none"> Updates to water quality records (including aquatic invasive species) Updates to downstream ecological interests with aquatic dependence (the Welsh Harp) Updates to flood event history covering the period postsubmission. Updates to reflect current water policy, comprising primarily the requirements (including the investigation of SuDS) introduced within the <i>Flood and Water Management Act, 2010</i>, <i>NPPF</i> and <i>London Plan</i>. <p>Please ensure that issues raised in the consultation response for the Environment Agency are properly considered in preparing the ES.</p>

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Review criteria	Review comments	Recommendations
<p>Has adequate consultation has taken place to date?</p>	<ul style="list-style-type: none"> • It was noted that previous EA consultations was extensive. Changing the design would require this process to be undertaken again. • Thames Water previously stipulated that there should be no increase on discharge into their network and EA requested that significant betterment to the existing drainage regime should be required. The EA said the scale and scope of the project should have “exemplar river restoration”. Any reduction in greenspaces and the realigning away from the consented alignment is likely to move away from these requests based on the information provided. • Consultation with the EA to discuss the revised s73 River Brent realignment are ongoing. As part of this process it has been agreed to update the FRA for the site in line with the NPPF. It has also been agreed with the EA that flood modelling of the varied alignment will be carried out in ISIS-TUFLOW. Furthermore, the EA confirmed that while information should be used from its model, an independent model should be developed. 	<ul style="list-style-type: none"> • Consultation to this point appears adequate but will need to continue.

Review criteria	Review comments	Recommendations
<p>Have all potential sources of impact and resulting environmental effects been identified?</p>	<ul style="list-style-type: none"> As discussed in Chapter 3.1.8 section 73 “Assessment & methodology” significant additional assessment is required in relation to Water Resources and Flood Risk. The recommendations provided do require some extension. Further information on the specific existing and proposed river route alignment is required so further investigations can be undertaken in relation to the impact of the re-alignment. Such a significant difference in the masterplan arrangement will require a full reassessment of issues surrounding flood risk and drainage design. This would include a revisiting the hydraulic modelling carried out by Scott Wilson (URS) and apply a new channel alignment and building layout to it. 	<ul style="list-style-type: none"> The scoping report suggests the only source of impact will be the change in river alignment. There is no mention of the impact of the change in masterplan in the s73 application on the SUDS strategy. Therefore a review of the SUDs strategy may be required in light of the masterplan changes. The environmental effects identified in the original RES will need to be confirmed for the s73 alignment.
<p>Have potential impacts or effects been scoped out and is justification given for this?</p>	<ul style="list-style-type: none"> The potential impacts of the new scheme on water resource and flood risk are discussed in the Scoping Report chapter 3.1.8 with issues being raised and justifications for why further work is required provided within the section. As would be expected within this report this has only been undertaken at a high level with limited information. The discussion with regards to new policy could have been extended to say that the FRA should be updated as part of the review process to account for the introduction of the Flood and Water Management Act, 2010 and NPPF. Impacts not discussed include the potential impacts of the “living bridge”. If this Bridge is spanning the realigned river then any impacts of the proposed Bridges will need to be considered in the reassessment of the flood risk. 	<ul style="list-style-type: none"> None.

Review criteria	Review comments	Recommendations
Has the temporal and spatial scope been identified?	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • No response required.
Are the methods proposed for baseline collection appropriate to the needs?	<ul style="list-style-type: none"> • Does not address flood risks due to living bridge or realignment of river sufficiently and significant modifications to the pluvial drainage regime are likely to be apparent from the new scheme. 	<ul style="list-style-type: none"> • No further recommendations.
Are the proposed methods of assessment robust and transparent?	<ul style="list-style-type: none"> • Items discussed in the Scoping Report 3.1.8 would provide a good assessment of the modifications of the works in relation to water resource and flood risk. However, this needs extending as discussed above. 	<ul style="list-style-type: none"> • The only change from the consented scheme is the change of river alignment. The change will be modelled in ISIS-TUFLOW which is robust method of assessment. • There is no method of assessment of water quality discussed. • The SuDs solution from the original RES needs to be reviewed against masterplan changes.
Is the built-in mitigation suggested appropriate?	<ul style="list-style-type: none"> • Not at present. Should the recommendations in Scoping Report 3.1.8 be undertaken along with those identified above then this will provide the level of mitigation against flood risk, drainage issue etc that are required. • Removing greenspace will increase run-off to sewers and make pluvial flooding more probable. Realigning the river away from a central location and towards the road has the potential to increase the flood hazard to road users and available floodplain storage is likely to be reduced due to the development proposals. 	<ul style="list-style-type: none"> • None.

6h Archaeology and Cultural Heritage

Review criteria	Review comments	Recommendations
Has adequate baseline information been provided to identify potential environmental effects?	<ul style="list-style-type: none"> The baseline is very brief but the full details are available in the full original ES. 	<ul style="list-style-type: none"> None.
Has adequate consultation has taken place to date?	<ul style="list-style-type: none"> No mention of consultation with English Heritage (a statutory consultee). The document states that the council will be consulted. Consultation was undertaken as part of the original assessment. 	<ul style="list-style-type: none"> Scoping response from the Development Control Archaeologist and English Heritage should be taken into account when undertaking the full ES.
Have all potential sources of impact and resulting environmental effects been identified?	<ul style="list-style-type: none"> All potential issues have been drawn from the assessment undertaken as part of the original application. No new assessment work has been undertaken. The original assessment was comprehensive. 	<ul style="list-style-type: none"> None.
Have potential impacts or effects been scoped out and is justification given for this?	<ul style="list-style-type: none"> No additional impacts have been identified from over those identified in the original ES. 	<ul style="list-style-type: none"> None.
Has the temporal and spatial scope been identified?	<ul style="list-style-type: none"> Yes – in original ES 	<ul style="list-style-type: none"> None.
Are the methods proposed for baseline collection appropriate to the needs?	<ul style="list-style-type: none"> No additional work proposed. <p>A review should address the changes in planning policy since the original ES.</p>	<ul style="list-style-type: none"> None.
Are the proposed methods of assessment robust and transparent?	<ul style="list-style-type: none"> A formulaic methodology was not adopted for the original ES and was agreed by the Council. No new assessment is required. 	<ul style="list-style-type: none"> None.
Is the built-in mitigation suggested appropriate?	<ul style="list-style-type: none"> Yes. 	<ul style="list-style-type: none"> None.

Review criteria	Review comments	Recommendations
	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> None.

6i Air Quality and Dust

Review criteria	Review comments	Recommendations
Has adequate baseline information been provided to identify potential environmental effects?	<ul style="list-style-type: none"> The impact of the proposed scheme on air quality will be dependent on the extent to which the traffic flows change on the local road network. The proposed S73 development is unlikely to have a material effect on traffic generation, however, may alter the traffic flows on individual links. There is insufficient information provided to determine if this will be the case. The scoping document states that, <i>“long term trends in air quality in London based upon ambient monitoring undertaken in the city, demonstrate that the long term air quality trend is stable. In addition, policies aimed at improving air quality do not appear to be resulting in significant changes in air quality. On this basis, the baseline air quality data used in the assessment is likely to remain valid.”</i> Whilst this is generally true it is recommended that the baseline data used in the assessment be updated to reflect the most recent monitoring data for the Borough. 	<ul style="list-style-type: none"> Updated data should be included in the revised assessment to show that background concentrations have remained similar to the levels in the original assessment and that no trend has formed.
Has adequate consultation has taken place to date?	<ul style="list-style-type: none"> The air quality section does not make specific reference to consultations with the relevant EHO in the LB of Barnet, however, general consultations with the council and other statutory consultees is to be undertaken. 	<ul style="list-style-type: none"> Consult with the LA once the final traffic data is available.

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Review criteria	Review comments	Recommendations
<p>Have all potential sources of impact and resulting environmental effects been identified?</p>	<ul style="list-style-type: none"> • The scoping assessment does not provide details of the model to be use; the source of any emission data of the meteorological data to be used. • The scoping methodology states that, <i>“As the assumed traffic generations are not changing, remodelling the entire Scheme is considered to be unnecessary. However, for particular junctions and links, the impact assessment may need updating, where there are significant changes to road traffic between the previously proposed scheme and the Scheme changes. Remodelling may be required if there are traffic flows which are increasing by greater than 5%, or there are new roads being developed which were not present in the previous model.”</i> This is considered acceptable however, as the scheme also include a CHP scheme which will operate on Refuse Derived Fuel (RDF) the assessment should also consider cumulative impacts of road and stack emissions. • The assessment does not propose undertaking a revised dust assessment. 	<ul style="list-style-type: none"> • Will be determined by traffic data.

Review criteria	Review comments	Recommendations
Have potential impacts or effects been scoped out and is justification given for this?	<ul style="list-style-type: none"> The assessment scopes out the updating of baseline air quality conditions however, these should be updated to ensure they are in line with current monitoring undertaken in the borough. The proposed methodology scopes out remodelling the entire scheme and proposes focusing on those junctions/roads where significant traffic changes occur (taken as a change in traffic of 5% in accordance with the guidance given in EPUK Air Quality Guidance 2010) or where a new road is added. This is considered appropriate; however the assessment should also consider those roads where the development will cause a material change in traffic speeds or HDV movements. As well as the cumulative impacts of the CHP and any other consented developments in the area. 	<ul style="list-style-type: none"> Yes
Has the temporal and spatial scope been identified?	<ul style="list-style-type: none"> No, however, this will be dependent on the scale of changed in traffic flows as a result of the development. 	<ul style="list-style-type: none"> Will be determined by the traffic data.
Are the methods proposed for baseline collection appropriate to the needs?	<ul style="list-style-type: none"> The baseline should be updated to reflect the most recent findings of the LB Barnet Review and Assessment process and background monitoring undertaken in the Borough. 	<ul style="list-style-type: none"> Yes.
Are the proposed methods of assessment robust and transparent?	<ul style="list-style-type: none"> The scoping document does not detail what model is to be used or the meteorological data etc. The extent of any assessment is also not determined however this will be based on the extent that the traffic data changes. 	<ul style="list-style-type: none"> Yes however will be determined by the traffic data.
Is the built-in mitigation suggested appropriate?	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> Yes though an updated construction dust impact assessment is to be completed using updated guidance.

6j Ground Contamination

Review criteria	Review comments	Recommendations
Has adequate baseline information been provided to identify potential environmental effects?	<ul style="list-style-type: none"> The scoping report indicates the baseline data was collected in 2006 and states that the site is likely to remain unchanged until the time of construction. 	<ul style="list-style-type: none"> It is recommended that the baseline data is checked to ensure it is up to date with respect to landuse, water abstractions, groundwater vulnerability, aquifer designations etc.
Has adequate consultation taken place to date?	<ul style="list-style-type: none"> No mention of consultation in the Scoping Report, although the ES states there have been visits to site from the Environmental Health Officers. 	<ul style="list-style-type: none"> Scoping responses from the EHOs should be taken into account when undertaking the new ES. The Environment Agency should be consulted, due to the presence of the River Brent on the site. There is a requirement for a detailed risk assessment for the realignment of the River Brent – the EA are very likely to ask for this.
Have all potential sources of impact and resulting environmental effects been identified?	<ul style="list-style-type: none"> Additional ground surveys will be carried out along the revised River Brent alignment. 	<ul style="list-style-type: none"> See comment regarding baseline conditions.
Have potential impacts or effects been scoped out and is justification given for this?	<ul style="list-style-type: none"> The scoping report refers to the requirement for submission of Site Specific Remediation Strategies for each Remediation Zone. Linked planning conditions deal with the requirements for monitoring and reporting the outcomes of remediation. 	<ul style="list-style-type: none"> For completeness, the scoping report should make reference to the requirement for detailed risk assessment for controlled waters, which is required to close out planning conditions.
Has the temporal and spatial scope been identified?	<ul style="list-style-type: none"> No, not in the scoping report. Without a full review of the existing ES this cannot be confirmed. 	None.

Review criteria	Review comments	Recommendations
<p>Are the methods proposed for baseline collection appropriate to the needs?</p>	<ul style="list-style-type: none"> • The following legislative changes have occurred since the previous work was carried out: <ul style="list-style-type: none"> ○ Part 2A was amended in April 2012, and describes in detail the process of risk assessment, i.e. whether potential contaminant linkages are present. ○ The National Planning Policy Framework has replaced Planning Policy Statement PPS23: Planning Pollution Control. ○ The Environment Agency has updated its classification of aquifers, as well as their guidance of groundwater protection – principals and practice (GP3). 	<ul style="list-style-type: none"> • In light of these legislative changes, it would be recommended that existing data be reviewed and any data gaps be identified for scoping supplementary ground investigations.
<p>Are the proposed methods of assessment robust and transparent?</p>	<ul style="list-style-type: none"> • See above. 	
<p>Is the built-in mitigation suggested appropriate?</p>	<ul style="list-style-type: none"> • Mitigation measures will be developed during the site investigation process, and will be detailed in the remediation strategy. 	<ul style="list-style-type: none"> • None.

6k Waste

Review criteria	Review comments	Recommendations
Has adequate baseline information been provided to identify potential environmental effects?	<ul style="list-style-type: none"> Baseline data is based on building footprints and waste generation rates. 	<ul style="list-style-type: none"> Methodology for baseline appears reasonable.
Has adequate consultation has taken place to date?	<ul style="list-style-type: none"> No mention of consultation in the Scoping Report. 	<ul style="list-style-type: none"> N/A
Have all potential sources of impact and resulting environmental effects been identified?	<ul style="list-style-type: none"> No specific mention in Scoping Report, but it is assumed that these are addressed in ES chapter. 	<ul style="list-style-type: none"> N/A
Have potential impacts or effects been scoped out and is justification given for this?	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A
Has the temporal and spatial scope been identified?	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A
Are the methods proposed for baseline collection appropriate to the needs?	<ul style="list-style-type: none"> Not included in Scoping Report. 	<ul style="list-style-type: none"> Assumed that this is in ES Chapter.
Are the proposed methods of assessment robust and transparent?	<ul style="list-style-type: none"> Yes, changes in recycling rates will be updated. 	<ul style="list-style-type: none"> N/A
Is the built-in mitigation suggested appropriate?	<ul style="list-style-type: none"> Predicted waste arisings not likely to change – therefore recommended mitigation not likely to change. 	<ul style="list-style-type: none"> No further action needed.

6I Microclimate

Review criteria	Review comments	Recommendations
Has adequate baseline information been provided to identify potential environmental effects?	<ul style="list-style-type: none"> • Yes. 	<ul style="list-style-type: none"> • No response required.
Has adequate consultation has taken place to date?	<ul style="list-style-type: none"> • None required. 	<ul style="list-style-type: none"> • No response required.
Have all potential sources of impact and resulting environmental effects been identified?	<ul style="list-style-type: none"> • Yes. 	<ul style="list-style-type: none"> • No response required.
Have potential impacts or effects been scoped out and is justification given for this?	<ul style="list-style-type: none"> • Construction impacts have been scoped out and this has been justified. 	<ul style="list-style-type: none"> • No response required.
Has the temporal and spatial scope been identified?	<ul style="list-style-type: none"> • Yes – As before. 	<ul style="list-style-type: none"> • No response required.
Are the methods proposed for baseline collection appropriate to the needs?	<ul style="list-style-type: none"> • No significant changes to existing baseline. 	<ul style="list-style-type: none"> • No response required.
Are the proposed methods of assessment robust and transparent?	<ul style="list-style-type: none"> • Yes. 	<ul style="list-style-type: none"> • No response required.
Is the built-in mitigation suggested appropriate?	<ul style="list-style-type: none"> • Yes. The mitigation for the consented scheme <i>“is likely to require updating on the basis of the revised 3D model assessment”</i>. 	<ul style="list-style-type: none"> • No response required.

6m Sunlight and Daylight

Review criteria	Review comments	Recommendations
Has adequate baseline information been provided to identify potential environmental effects?	<ul style="list-style-type: none"> The scoping document refers to the existing baseline considered for microclimate daylight studies as relevant but does not describe it. 	<ul style="list-style-type: none"> Daylight and sunlight models to be updated based on new layout.
Has adequate consultation has taken place to date?	<ul style="list-style-type: none"> Not able to be determined via microclimate description. 	<ul style="list-style-type: none"> Daylight and sunlight models to be updated based on new layout
Have all potential sources of impact and resulting environmental effects been identified?	<ul style="list-style-type: none"> Potential sources of impacting would arise from any new built forms. The microclimate daylight study is scheduled to be revised due to parameter changes to the proposed development diverging from the Indicative Layout. 	<ul style="list-style-type: none"> Daylight and sunlight models to be updated based on new layout
Have potential impacts or effects been scoped out and is justification given for this?	<ul style="list-style-type: none"> The chapter is required and scheduled to be revised so effects or impacts have not been scoped out. 	<ul style="list-style-type: none"> Daylight and sunlight models to be updated based on new layout
Has the temporal and spatial scope been identified?	<ul style="list-style-type: none"> Unable to be determined via microclimate description. 	<ul style="list-style-type: none"> Daylight and sunlight models to be updated based on new layout River corridor area, bridge and buildings where the design scope has changed have been referenced.
Are the methods proposed for baseline collection appropriate to the needs?	<ul style="list-style-type: none"> Unable to be determined via microclimate description. 	<ul style="list-style-type: none"> Daylight and sunlight models to be updated based on new layout BRE 209 and BS8206 referenced. Will need further detail from report. Correct reference of BRE 2009 in document to BRE 209.

Review criteria	Review comments	Recommendations
Are the proposed methods of assessment robust and transparent?	<ul style="list-style-type: none"> Unable to be determined via microclimate description although both BRE 2009 and BS8206 are referenced. It may be beneficial to review if BRE 2011 is now applicable. 	<ul style="list-style-type: none"> Daylight and sunlight models to be updated based on new layout
Is the built-in mitigation suggested appropriate?	<ul style="list-style-type: none"> Unable to be determined via microclimate description. 	<ul style="list-style-type: none"> Daylight and sunlight models to be updated based on new layout

6n TV, Radio and Mobile Phone Reception

It has been concluded that the potential impacts to TV, radio and mobile phone reception will not change from the previous assessment and therefore it is not proposed to update this assessment from the approved RES. We agree with this statement and have no further comments to make.

6o Carbon Dioxide Emissions

Subject to the following clarifications we confirm that the approach proposed in the scoping report is sufficient. Please confirm that the total vehicle numbers will not change and that the number and type of energy centres previously assessed will not change.

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