

Aylesham Centre

Environmental Statement Addendum

Volume 3: Technical Appendices

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Schedule 4 Information Requirements – Location of Information within the ES

The Environmental Statement (ES) for The Aylesham Centre comprises of the July 2024 ES and the December 2024 ES Addendum. Therefore, this document supersedes the previous wayfinding document, as located within **ES Volume 3, Appendix: Introduction – Annex 1.**

	Information for Inclusion in Environmental Statements, as Specified in Schedule 4 of the EIA Regulations 2017 (as amended)	How the EIA addresses the Information Specifications
1.	A description of the development, including in particular:	
(a)	a description of the location of the development;	ES Volume 1: Chapter 1: Introduction ES Addendum December 2024 Volume 1: Main Report: Chapter 1: Introduction, ES Addendum Approach and Proposed Amendments
(b)	a description of the physical characteristics of the whole development, including, where relevant, requisite Enabling works, and the land-use requirements during the construction and operational phases;	ES Volume 1: Chapter 4: The Proposed Development Chapter 5: Demolition and Construction ES Addendum December 2024 Volume 1: Main Report: Chapter 1: Introduction, ES Addendum Approach and Proposed Amendments
(c)	a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used.	ES Volume 1: Chapter 4: The Proposed Development
	...nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used; and	ES Volume 1: Chapter 4: The Proposed Development Chapter 5: Demolition and Construction
(d)	an estimate, by type and quantity, of expected residues and emissions (such as water, ...	ES Volume 1: Chapter 4: The Proposed Development ES Volume 3: Appendix: EIA Methodology
	...air, ...	ES Volume 1: Chapter 8: Air Quality ES Volume 3: Appendix: Air Quality ES Addendum December 2024 Volume 1: Main Report: Chapter 8: Air Quality
	...soil and subsoil pollution,	ES Volume 1: Chapter 13: Ground Conditions and Land Contamination ES Volume 3: Appendix: EIA Methodology Appendix: Ground Conditions and Land Contamination ES Addendum December 2024 Volume 1: Main Report: Chapter 13: Ground Conditions and Land Contamination
	...noise, vibration, ...	ES Volume 1: Chapter 9: Noise and Vibration ES Volume 3: Appendix: Noise and Vibration ES Addendum December 2024 Volume 1: Main Report: Chapter 9: Noise and Vibration
	...light, ...	ES Volume 1: Chapter 10: Daylight, Sunlight and Overshadowing

	Information for Inclusion in Environmental Statements, as Specified in Schedule 4 of the EIA Regulations 2017 (as amended)	How the EIA addresses the Information Specifications
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	...heat, radiation and ...	ES Volume 1: Chapter 10: Daylight, Sunlight and Overshadowing ES Volume 3: Appendix: EIA Methodology ES Addendum December 2024 Volume 1: Main Report: Chapter 10: Daylight, Sunlight and Overshadowing
	...quantities and types of waste produced during the construction and operation phases;	ES Volume 1: Chapter 4: The Proposed Development Chapter 5: Demolition and Construction
2.	A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	ES Volume 1: Chapter 3: Alternatives and Design Evolution
3.	A description of the relevant aspects of the current state of the environment (baseline scenario) ...	ES Volume 1: Chapter 1: Introduction Chapter 3: Alternatives and Design Evolution Technical Chapters 6 to 14 ES Volume 2: Heritage, Townscape and Visual Impact Assessment ES Addendum December 2024 Volume 1 and 2
	...and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.	ES Volume 1: Chapter 2: EIA Methodology Technical Chapters 6 to 14 ES Volume 2: Heritage, Townscape and Visual Impact Assessment ES Addendum December 2024 Volume 1 Main Report: Technical Chapters 6-14 and Volume 2
4.	A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, ...	ES Volume 1: Chapter 6: Socio-Economics Chapter 7: Traffic and Transport Chapter 8: Air Quality Chapter 9: Noise and Vibration Chapter 13: Ground Conditions and Land Contamination ES Volume 3: Appendix: EIA Methodology Appendix: Air Quality Appendix: Noise and Vibration Appendix: Ground Conditions and Land Contamination ES Addendum December 2024 Volume 1 Main Report: Technical Chapters 6-14, and Volume 2 and 3
	...biodiversity (for example fauna and flora), ...	ES Volume 1:

	Information for Inclusion in Environmental Statements, as Specified in Schedule 4 of the EIA Regulations 2017 (as amended)	How the EIA addresses the Information Specifications
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	...land (for example land take), ...	ES Volume 3: Appendix: EIA Methodology
	...soil (for example organic matter, erosion, compaction, sealing), ...	ES Volume 1: Chapter 13: Ground Conditions and Land Contamination ES Volume 3: Appendix: Ground Conditions and Land Contamination ES Addendum December 2024 Volume 1: Main Report: Chapter 13: Ground Conditions and Land Contamination
	...water (for example hydromorphological changes, quantity and quality), ...	ES Volume 1: Chapter 4: The Proposed Development Chapter 13: Ground Conditions and Land Contamination ES Volume 3: Appendix EIA Methodology Appendix: Ground Conditions and Land Contamination ES Addendum December 2024 Volume 1: Main Report: Chapter 13: Ground Conditions and Land Contamination
	...air, ...	ES Volume 1: Chapter 8: Air Quality ES Volume 3: Appendix: EIA Methodology Appendix: Air Quality ES Addendum December 2024 Volume 1: Main Report: Chapter 8: Air Quality
	...climate (for example greenhouse gas emissions, impacts relevant to adaptation), ...	ES Volume 1: Chapter 4: The Proposed Development Chapter 8: Air Quality Chapter 14: Climate Change and Greenhouse Gases ES Volume 3: Appendix: Air Quality Appendix: Climate Change and Greenhouse Gases ES Addendum December 2024 Volume 1: Main Report: Chapter 8: Air Quality and 14: Climate Change and Greenhouse Gases
	...material assets, cultural heritage, including architectural and archaeological aspects, and landscape...	ES Volume 1: Chapter 2: EIA Methodology Chapter 12: Archaeology ES Volume 2: Heritage, Townscape and Visual Impact Assessment ES Volume 3: Appendix: EIA Methodology Appendix: Archaeology ES Addendum December 2024 Volume 1: Main Report: Chapter 12: Archaeology and Volume 2 HTVIA Addendum

	Information for Inclusion in Environmental Statements, as Specified in Schedule 4 of the EIA Regulations 2017 (as amended)	How the EIA addresses the Information Specifications
5.	A description of the likely significant effects of the development on the environment resulting from, inter alia:	
(a)	the construction and existence of the development, including, where relevant, Enabling works.	ES Volume 1: Chapter 5: Demolition and Construction Technical Chapters 6 to 14 Chapter 16: Likely Significant Effects ES Volume 2: Heritage, Townscape and Visual Impact Assessment ES Addendum December 2024 Volume 1 Main Report: Technical Chapters 6-14, and Volume 2
(b)	the use of natural resources, in particular land, soil, ...	ES Volume 1: Chapter 4: The Proposed Development Chapter 5: Demolition and Construction Chapter 13: Ground Conditions and Land Contamination ES Volume 3: Appendix: EIA Methodology Appendix: Ground Conditions and Land Contamination ES Addendum December 2024 Volume 1: Main Report: Chapter 13: Ground Conditions and Land Contamination
	...water and ...	ES Volume 1: Chapter 4: The Proposed Development Chapter 13: Ground Conditions and Land Contamination ES Volume 3: Appendix: EIA Methodology Appendix: Ground Conditions and Land Contamination ES Addendum December 2024 Volume 1: Main Report: Chapter 13: Ground Conditions and Land Contamination
	...biodiversity, ...	ES Volume 1: Chapter 4: The Proposed Development ES Volume 3: Appendix: EIA Methodology ES Addendum December 2024 Volume 1: Main Report: Chapter 1: Introduction, ES Addendum Approach and Proposed Amendments
	...considering as far as possible the sustainable availability of these resources;	ES Volume 1: Chapter 4: The Proposed Development Chapter 5: Demolition and Construction Technical Chapters 6 to 14 ES Addendum December 2024 Volume 1 Main Report: Chapter 1: Introduction, ES Addendum Approach and Proposed Amendments and Technical Chapters 6-14
	the emission of pollutants, ...	ES Volume 1: Chapter 8: Air Quality Chapter 14: Climate Change and Greenhouse Gases ES Volume 3: Appendix: Air Quality Appendix: Climate Change and Greenhouse Gases ES Addendum December 2024 Volume 1: Main Report: Chapter 8: Air Quality and 14: Climate Change and Greenhouse Gases
	...noise, vibration, ...	ES Volume 1:

	Information for Inclusion in Environmental Statements, as Specified in Schedule 4 of the EIA Regulations 2017 (as amended)	How the EIA addresses the Information Specifications
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	...light, ...	ES Volume 1: Chapter 10: Daylight, Sunlight and Overshadowing ES Volume 3: Appendix: Daylight, Sunlight and Overshadowing ES Addendum December 2024 Volume 1: Main Report: Chapter 10: Daylight, Sunlight and Overshadowing
	...heat and radiation, ...	ES Volume 1: Chapter 10: Daylight, Sunlight and Overshadowing ES Volume 3: Appendix: EIA Methodology ES Addendum December 2024 Volume 1: Main Report: Chapter 10: Daylight, Sunlight and Overshadowing
	...the creation of nuisances, ...	ES Volume 1: Chapter 8: Air Quality Chapter 9: Noise and Vibration Chapter 11: Wind Microclimate ES Volume 3: Appendix: Air Quality Appendix: Noise and Vibration Appendix: Wind Microclimate ES Addendum December 2024 Volume 1: Main Report: Chapters 8, 9 and 11
	...and the disposal and recovery of waste;	ES Volume 1: Chapter 4: The Proposed Development Chapter 5: Demolition and Construction ES Volume 3: Appendix: EIA Methodology ES Addendum December 2024 Volume 1 Main Report: Chapter 1: Introduction, ES Addendum Approach
(d)	the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);	ES Volume 1: Chapter 2: EIA Methodology Chapter 6: Socio-Economics Chapter 7: Traffic and Transport Chapter 8: Air Quality Chapter 9: Noise and Vibration Chapter 11: Wind Microclimate Chapter 12: Archaeology Chapter 13: Ground Conditions and Land Contamination ES Volume 2: Heritage, Townscape and Visual Impact Assessment ES Volume 3: Appendix: EIA Methodology Appendix: Air Quality Appendix: Noise and Vibration

	Information for Inclusion in Environmental Statements, as Specified in Schedule 4 of the EIA Regulations 2017 (as amended)	How the EIA addresses the Information Specifications
		Appendix: Wind Microclimate Appendix: Archaeology Appendix: Ground Conditions and Land Contamination ES Addendum December 2024 Volume 1 Main Report: Technical Chapters 6-14, and Volume 2
(e)	the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;	ES Volume 1: Technical Chapters 6 to 14 Chapter 15: Effect Interactions Chapter 16: Likely Significant Effects ES Volume 2: Heritage, Townscape and Visual Impact Assessment ES Addendum December 2024 Volume 1 Main Report: Technical Chapters 6-14 and Concluding chapters, and Volume 2
(f)	the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change; and	ES Volume 1: Chapter 4: The Proposed Development Chapter 14: Climate Change and Greenhouse Gases ES Volume 3: Appendix: Climate Change and Greenhouse Gases ES Addendum December 2024 Volume 1: Main Report: 14: Climate Change and Greenhouse Gases
(g)	the technologies and the substances used.	ES Volume 1: Chapter 4: The Proposed Development Chapter 5: Demolition and Construction Technical Chapters 6 to 14 ES Addendum December 2024 Volume 1 Main Report: Technical Chapters 6-14
6.	A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	ES Volume 1: Chapter 2: EIA Methodology Technical Chapters 6 to 14 ES Volume 2: Heritage, Townscape and Visual Impact Assessment ES Addendum December 2024 Volume 1 Main Report: Technical Chapters 6-14 and Volume 2
7.	A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.	ES Volume 1: Chapter 4: The Proposed Development Chapter 5: Demolition and Construction Technical Chapters 6 to 14 Chapter 17: Environmental Management, Monitoring and Mitigation Schedule ES Addendum December 2024 Volume 1 Main Report: Technical Chapters 6-14 and Concluding chapters, and Volume 2
8.	A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to EU legislation such as Directive 2012/18/EU(c) of the European Parliament and of the Council or Council Directive 2009/71/Euratom(d) or UK environmental assessments may be used for this purpose provided that	ES Volume 3: Appendix: EIA Methodology

	Information for Inclusion in Environmental Statements, as Specified in Schedule 4 of the EIA Regulations 2017 (as amended)	How the EIA addresses the Information Specifications
	the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.	
9.	non-technical summary of the information provided under paragraphs 1 to 8.	Revised ES Non-Technical Summary
10.	A reference list detailing the sources used for the descriptions and assessments included in the environmental statement.	ES Volume 1: All ES chapters (In-chapter referencing) ES Volume 2: Heritage, Townscape and Visual Impact Assessment ES Volume 3: Technical Appendices ES Addendum December 2024 Volume 1: Main Report: Chapter 1: Introduction, ES Addendum Approach and Proposed Amendments, Technical Chapters 6-14 and Volumes 2 and 3

Appendix: Introduction, ES Addendum Approach and Proposed Amendments

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Aylesham Centre: Competent Expert and Relevant Experience

Regulation 18(5) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (referred to as ‘the EIA Regulations’) require that to ensure the completeness and quality of the ES: ‘(a) the developer must ensure that the environmental statement is prepared by competent experts’; and ‘(b) the environmental statement must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts’.

As set out in **ES Volume 1, Chapter 1: Introduction** of the ES, Trium is an environmental consultancy specialising in urban regeneration and property development projects in the United Kingdom (UK), with a specific focus in London. Trium is therefore considered to be ‘competent experts’ as referenced in the EIA Regulations. In addition, and for completeness, Table 1 below sets out the company, persons and expertise of all the key technical specialists that have worked on the EIA.

Table 1 Experts Involved in the Production of the ES and their Relevant Experience

EIA Technical Discipline	Company	Summary of Experience
EIA Coordination	Trium	Trium is an environmental consultancy specialising in urban regeneration and property development projects in the United Kingdom (UK), with a specific focus in London. Trium's Partners and Employees have extensive experience in managing the environmental issues and impacts surrounding large scale, high profile urban regeneration development projects. The Partners and Employees of Trium have, over the course of their careers to date (including with former employers), project directed, managed or contributed to over 500 EIAs within the commercial, retail, residential, leisure, cultural, infrastructure and industrial sectors. They have particular expertise in London based development projects.
Socio-Economics	Quod	The socio-economic assessment has been prepared by Quod. Quod is Institute of Environmental Management and Assessment (IEMA) accredited having been awarded the EIA Quality Mark in March 2017. Several of Quod's Socio-Economic and EIA team are also individual IEMA-accredited members.
Traffic and Transport	Arup	Arup is an international multidisciplinary built environment consultancy. Arup's London transport consulting team supports urban regeneration and property development project in London, across the UK and around the world. Arup's transport team has extensive experience in assessing transport related environmental impacts arising from large scale, high profile urban regeneration development projects. Arup's London based transport team has undertaken EIA's for a large number of developments, from nationally significant infrastructure projects such as airports and high speed railways through to large urban regeneration masterplans across London and the UK. Arup's lead assessor for this project has 20 years' experience as a transport and development consultant including over 10 years' experience leading the assessment of transport impact in EIAs on projects in London.
Air Quality	Air Quality Consultants (AQC) Ltd	Air Quality Consultants provides expert advice and support to developers, industry, local authorities and policy makers. The Company has played a leading role in developing the air quality monitoring, modelling and assessment regime both in the UK and overseas. The Company frequently provides expert evidence at Public Inquiries and it has staff who have been involved in UK Government expert groups and European Commission working groups on air quality management and assessment. A large team of highly qualified consultants now provides expert services in the field of ambient air quality and climate change. Competent experts involved in the assessment and preparation of the Air Quality and Greenhouse Gas Emissions chapters have membership of the Institution of Environmental Sciences (MIEnvSc) and Institute of Air Quality Management (MIAQM).
Noise and Vibration	Hann Tucker Associates	Hann Tucker Associates is an independent acoustic consultancy offering expertise in a large number of sectors; from major building development planning and design to sound insulation testing and environmental monitoring. As one of the original names in the field of acoustic consultancy Hann Tucker staff have worked with nearly every major developer, architect, and contractor in the UK and have played a key role in major projects throughout Europe and internationally, showcasing our global reach and consistent performance.

EIA Technical Discipline	Company	Summary of Experience
Daylight, Sunlight and Overshadowing	Point 2 Surveyors Limited	Point 2 is firm of surveyors specialising in Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution. Point 2 have advised on over 3,200 projects and have worked alongside the majority of the UK's leading developers, institutions, architects and professional teams to advise on the impacts caused by some of the largest and highest profile urban development projects in London and across the UK. Point 2 have vast experience in advising on highly technically and politically challenging projects and have provided ES Chapters predominantly within the commercial, retail and residential sectors.
Wind Microclimate	Windtech Consultants (Europe) Limited	Windtech Consultants provides wind engineering services to architects, façade designers, structural engineers and developers. Since its opening in 1991, the firm has continued to grow considerably with global office locations to provide world-class service and support to our clients in the study of wind and structures. We have particular expertise in London based development projects and pedestrian wind environment wind tunnel and CFD studies. Windtech's London office has formally operated since 2018 and has been the lead wind engineer on over 300 UK projects. Windtech's London office has more than 35 years of combined experience in Wind/CFD/EIA for UK projects.
Archaeology	MOLA	MOLA is one of the largest archaeological and built heritage practices in the UK, with over 40 years' experience of providing independent, expert, and objective heritage guidance, research and fieldwork services. MOLA's specialist Pre-Planning Team is involved in over 150 projects each year, assisting clients with planning applications on sites including complex urban developments, large rural schemes and infrastructure projects, with expertise in producing Archaeological Desk-Based Assessments, Built Heritage Statements, Risk Assessments and Environmental Statements. MOLA is a Registered Organisation with ClfA (the Chartered Institute for Archaeologists); it holds an exemplary Health and Safety record, and supports a sustainable and equitable approach to all its work.
Ground Conditions and Land Contamination	RMA Environmental	RMA is an environmental consultancy specialising in the co-ordination of Environmental Impact Assessments and environmental planning support. RMA also provide specialist technical advice on land contamination, hydrology, Flood Risk Assessment, water quality and water resources. RMA's understanding of the planning process allows us to provide bespoke technical advice on environmental issues on new development projects. RMA has experience in working on a number of projects for various development types including high-rise development in London and residential and commercial development on both greenfield and brownfield sites. RMA's director has over 25 years' experience in EIA projects throughout the UK.
Climate Change and Greenhouse Gases	Air Quality Consultants (AQC) Ltd	Air Quality Consultants provides expert advice and support to developers, industry, local authorities and policy makers. The Company has played a leading role in developing the air quality monitoring, modelling and assessment regime both in the UK and overseas. The Company frequently provides expert evidence at Public Inquiries and it has staff who have been involved in UK Government expert groups and European Commission working groups on air quality management and assessment. A large team of highly qualified consultants now provides expert services in the field of ambient air quality and climate change. Competent experts involved in the assessment and preparation of the Air Quality and Greenhouse Gas Emissions chapters have membership of the Institution of Environmental Sciences (MIEnvSc) and Institute of Air Quality Management (MIAQM).
Heritage, Townscape and Visual Impact	The Townscape Consultancy	The Townscape Consultancy is a townscape and heritage consultancy formed by leading professionals in the field, building on the experience of the Peter Stewart Consultancy, which was acquired in October 2021 after 16 years of steady growth. With the combined expertise and reputation of our team of 15 professional staff, which includes architects, urban designers, heritage specialists, building historians, and planners, The Townscape Consultancy is one of the largest and most experienced consultancies in the field. The Townscape Consultancy have a wealth of experience in dealing with complex projects and EIAs for large scale regeneration and redevelopment projects.

Trium Environmental Consulting LLP is a limited liability partnership registered in England with no. OC415522 whose registered office is 3 Wellbrook Court, Gorton, Cambridgeshire, CB30NA. References to partners mean members of Trium Environmental Consulting LLP.
A list of the names of the members and their professional qualifications is available for inspection at the above office.

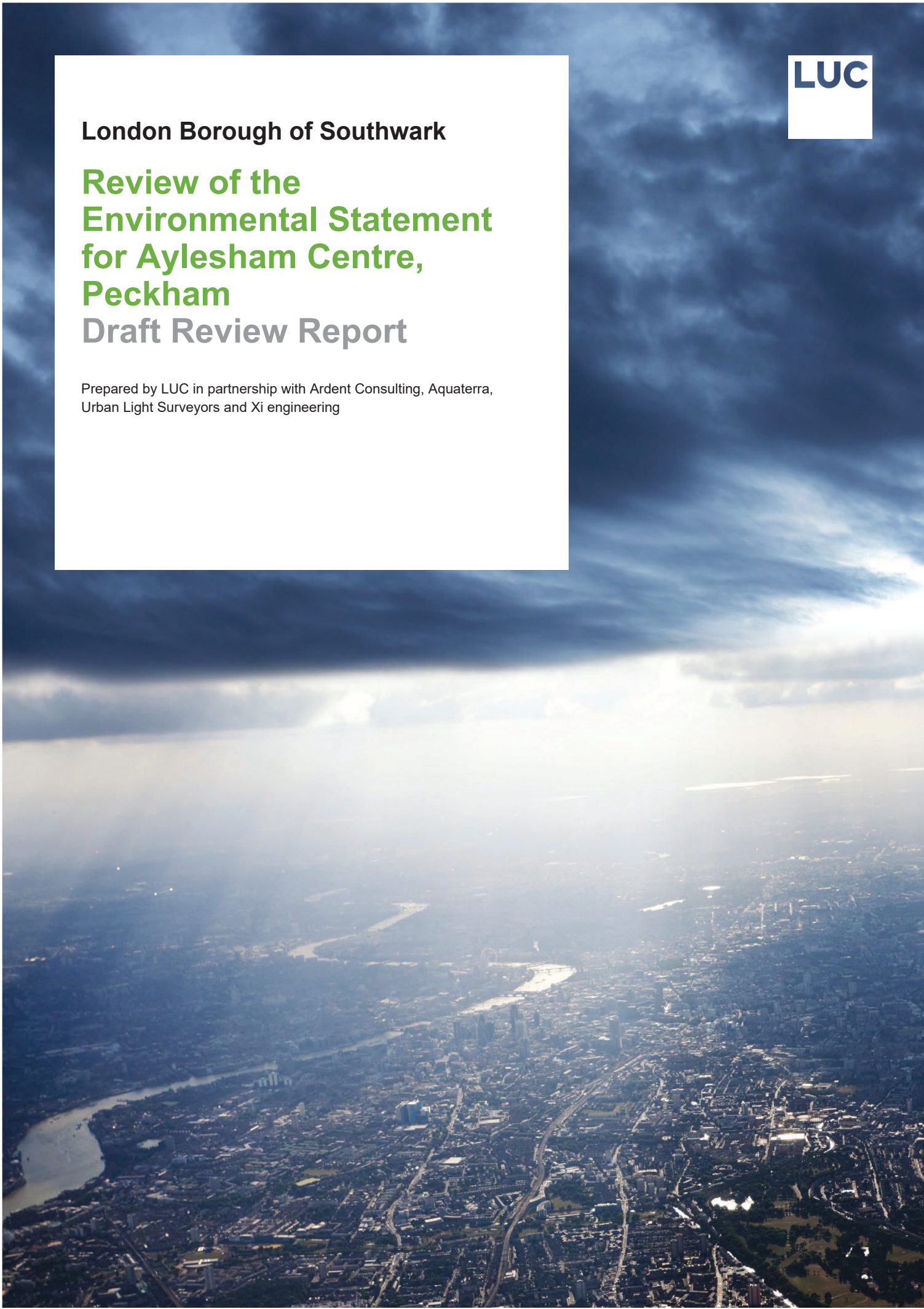
Appendix: Introduction, ES Addendum Approach and Proposed Amendments

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Annex 4: Revised Cumulative Schemes



London Borough of Southwark

Review of the
Environmental Statement
for Aylesham Centre,
Peckham
Draft Review Report

Prepared by LUC in partnership with Ardent Consulting, Aquaterra,
Urban Light Surveyors and Xi engineering



London Borough of Southwark

Aylesham Centre, Peckham ES Review
Draft Review Report

Version	Status	Prepared	Checked	Approved	Date
1.	Draft Review Report	LUC, Ardent, Aquaterra, ULS and Xi	L.Bishop	H.Kent	11.10.2024

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Cardiff
Edinburgh
Glasgow
London
Manchester
Sheffield

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Development Planning
Urban Design & Masterplanning
Environmental Impact Assessment
Landscape Planning & Assessment
Landscape Management
Ecology
Historic Environment
GIS & Visualisation
Transport & Movement Planning
Arboriculture



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Chapter 1

Introduction

1.1 LUC, in association with Ardent, Yellow Sub Geo, Xi Engineering and Urban Light Surveyors, has been commissioned by the London Borough of Southwark (LBS) to provide a critical review of the Environmental Statement (ES) (dated July 2024) for the redevelopment of the Aylesham Centre, Peckham (hereafter referred to as ‘the Proposed Development’) (Application Ref. 24/AP/2074). The ES was prepared by Trium on behalf of Berkeley Homes (Capital) Plc. (hereafter referred to as ‘the Applicant’).

1.2 The ES has been prepared under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (‘the EIA Regulations’). Under the EIA Regulations part 1, 4 (5) planning authorities are required to “*ensure that they have, or have access as necessary to, sufficient expertise to examine the environmental statement*”. LUC is a Registrant of the Institute of Environmental Management and Assessment (IEMA) EIA Quality Mark, and the LUC lead reviewer is individually accredited to the Institute. Details of the expertise of each of the team members involved in the review are set out in **Appendix A** to this review.

1.3 The purpose of this review is to determine whether the ES meets the statutory requirements of the EIA Regulations¹ and relevant guidance². The assessments undertaken must be of a high enough quality to provide confidence in the reported impacts of the scheme.

1.4 If issues with the adequacy or robustness of the ES are identified, the review identifies what additional information is required to address concerns.

1.5 The review focusses on the EIA and does not provide comment on any additional planning judgements that need to be made by LBS. Where the securing of an environmental commitment or obligation is considered to warrant a planning condition or Development Consent Order requirements, the proposed direction of such requests will be provided. The conclusions of the review report will be used by planning officers at LBS when determining the application.

Planning History

1.6 It is noted that the site has been subject to a number of previous planning applications, however, given their scale and nature (e.g. minor applications relating to individual shop units), they are not relevant to this EIA and have not been considered further.

1.7 In 2020, a request for a Scoping Opinion was submitted for a scheme which comprised the demolition of the existing shopping centre building and bus standing area, and construction of a mixed-use development (20/AO/0749). A Scoping Opinion was issued by LBS in July 2020, but a planning application was not submitted.

Proposed Development

1.8 The Proposed Development site (hereafter referred to as the ‘Site’) currently accommodates the Aylesham Centre alongside an associated surface car park, service yard and petrol filling station. The Aylesham Centre comprises retail units fronting on to Rye Lane with additional retail units within a covered mall, including a Morrisons supermarket. There is an existing basement which is located in the western areas of the site, underneath the Morrisons supermarket and retail units along Rye Lane.

1.9 The description of the Proposed Development is as follows:

‘The Proposed Development comprises a comprehensive phased redevelopment including the demolition of existing buildings and petrol station and provision of 877 homes, a replacement supermarket with associated service yard and car parking, flexible retail and leisure including drinking establishments, commercial floorspace (Use Class E/Sui Generis), landscaping and other associated works.

The buildings within the Proposed Development will range between six and 20 storeys in height with the tallest element (Building M) reaching a maximum height of 78.41m Above Ordnance Datum (AOD).

The construction of the Proposed Development, as described in detail within ES Volume 1, Chapter 5: Demolition and Construction, will be divided across two main phases as follows:

- Phase 1: Buildings L, M, N, P and Q, and the replacement supermarket which covers the eastern portion of the site, along Mckerrell Road to the east, Hanover Park to the south and the Peckham Bus Station to the north. The replacement supermarket

Chapter 1

Introduction

Aylesham Centre
October 2024

is provided within a podium below Buildings L, M, N, P and Q. A single storey basement is located below the podium; and

- Phase 2: Buildings A, B, C, D, E, F, G, H, J1, J2 and K, which cover the remainder of the site, along Rye Lane to the west, Hanover Park to the south and several retail and residential dwellings along Peckham High Street to the north.

The Proposed Development will provide a total of 105,639.2m² gross internal floorspace (GIA) distributed as follows:

- Residential (Class C3) – 88,388m²;
- Supermarket (Class E(a)) – 10,725.8m² (including associated service yard, plant and car park);
- Flexible Retail, Leisure and Commercial (Class E(a-g)/Sui Generis) (excl Supermarket) – 3,800.1m²; and
- Workspace (Class E(g)) – 2,725.3m².

The Proposed Development will also provide 9,407m² of publicly accessible open space across the site in addition to 3,077m² of children’s play space.’

Review Report

1.10 A criteria-based approach, developed by the Institute of Environmental Management and Assessment (IEMA) hereafter referred to as ‘the IEMA criteria’, has been used to inform this review³. The criteria cover:

- EIA regulatory compliance (COM3);
- EIA context and influence (the scope of the ES, coverage of alternatives and evolution of the scheme design, and consultation) (COM4);
- EIA content (the baseline conditions, assessment of impacts, and mitigation measures and management) (COM5); and
- EIA presentation (quality of the ES presentation and the Non-Technical Summary (NTS)) (COM6).

1.11 The review includes an assessment of the scope of the Environmental Impact Assessment (EIA) in relation to requirements set out in the LBS EIA Scoping Opinion issued in March 2024, hereafter referred to as ‘the Scoping Opinion’.

1.12 The review identifies a list of clarifications required from the applicant and a summary of any potential requests for further information under Regulation 25 of the EIA Regulations

¹Town and Country Planning (Environmental Impact Assessment) Regulations 2017

² Including the National Planning Guidance and the IEMA EIA Quality Review Criteria.

³ Full details of the IEMA EIA review criteria are available at: https://unionsquare.landuse.co.uk/DMS/view_document.aspx?ID=1687067&Latest=true The review of the ES has been undertaken in the

context of the updated EIA Regulations and relevant guidance for the specialist topics assessed, in addition to the IEMA criteria.

(referred to hereafter as potential Regulation 25 requests) to be made to the applicant, as appropriate. Potential Regulation 25 requests are identified in the first instance to enable the applicant to address the requests. Once the Applicant has received the clarifications and potential Regulation 25 requests from LBS they are invited to submit further information addressing the points raised.

1.13 Any further information received is reviewed and conclusions drawn as to whether the additional information is satisfactory and whether any Regulation 25 matters remain. These conclusions are then included in this report, and the document completed as the Final Review Report (FRR).

1.14 The structure of the report is as follows:

- Section 2 checks for Regulatory Compliance;
- Section 3 details review findings on the EIA Context and Influence (Scoping, Alternatives and Consultation)⁴;
- Section 4 provides commentary on the presentation of the ES and Non-Technical Summary⁵;
- Sections 5-18 are topic specific reviews relating to each topic covered in the ES⁶.
- Section 19 provides a summary of the submitted Regulation 25 Requests, Clarifications and proposed planning conditions.

⁴ IEMA EIA Quality Mark – ES Review Criteria, COM4: Context and Influence

⁵ IEMA EIA Quality Mark – ES Review Criteria, COM6: EIA Presentation

⁶ IEMA EIA Quality Mark – ES Review Criteria, COM5: EIA Content

Chapter 2 Initial Regulatory Checklist

2.1 This section checks for the presence or absence of each item below, in accordance with COM3 ‘Regulatory Compliance’ of the IEMA review criteria. Further detail is provided in the following sections in relation to the way each aspect of the EIA has been undertaken and is presented in the ES. Criteria A-I represent the minimum information which must be provided to constitute an ES.

2.2 It should be noted that the table below only confirms whether or not the information required has been provided in its most basic form, e.g. presence or absence of the topics in Criteria D, and does not confirm regulatory compliance.

2.3 As noted in the IEMA EIA Quality Mark: Registrant Guide, a number of the criteria under COM3 cover similar subjects to criteria set out in COM4, COM5 and COM6 which are reviewed below, and as such, there is inevitably some overlap. The review undertaken in subsequent sections of this report provides further detail in relation to the way each aspect of the EIA has been undertaken and is presented in the ES, focussing on the quality of the information provided.

Table 2.1 Regulatory Checklist

Criteria		Yes/No
A	Does the ES contain a clear section, or sections, providing a description of the development comprising information on the site, design and size of the development during construction and operation?	Yes, in Chapter 4: The Proposed Development.
B	Does the ES contain a section, or sections, that outline the main alternatives studied by the developer and an indication of the main reasons for this choice, taking into account the environmental effects?	Yes, in Chapter 3: Alternatives and Design Evolution.
C	Does the ES contain a clear section, or sections, that provides the data required to identify and assess the main effects which the development is likely to have on the environment?	Yes, in technical Chapters 6 – 14 and ES Volume 2
D	In the light of the development being assessed has the ES identified, described and assessed effects on: ■ Population ■ Human Health ■ Biodiversity (Fauna & Flora) ■ Land	Yes, as set out in Chapter 2: EIA Methodology, and the technical Chapters 6 – 14

Criteria		Yes/No
	■ Soil ■ Water ■ Air ■ Climate ■ Material Assets ■ Cultural Heritage ■ Landscape ■ Risk of major accidents and disasters ■ Other	and ES Volume 2
E	Does the ES attempt to set out the interaction between the factors set out in COM3 D) above?	Yes, this is set out in the relevant technical chapters, ES Volume 2, and in the Effect Interactions chapter (Chapter 15).
F	Does the ES contain a section, or sections, that describe the likely significant effects of the proposed development on the environment, including as reasonably required: direct, indirect, secondary, cumulative, short, medium, long-term, permanent and temporary, positive and negative effects?	Yes, in the relevant technical chapters, ES Volume 2, and in the Likely Significant Effects chapter (Chapter 16).
G	Does the ES contain a clear section, or sections, that provides a description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects?	Yes, set out in the relevant technical chapters, ES Volume 2, and in the Environmental Management, Mitigation and Monitoring Schedule chapter (Chapter 17).
H	Has a Non-Technical Summary been produced containing an outline of the information mentioned in COM3 A) to G)?	Yes.
I	Does the ES contain a section, or sections, that outline any difficulties encountered by the developer in compiling the information presented in the ES?	Yes, limitations and assumptions are set out on Chapter 2 and the relevant technical chapters.

Chapter 3

EIA Context and Influence

Scoping and Assessment

3.1 The Applicant sets out the list of topics to be scoped in and scoped out of the EIA process in Chapter 2 of the ES. These have been agreed with LBS through the Scoping process.

3.2 Scoped in topics are included in the ES as they were deemed potentially likely to experience a significant effect as a result of the Proposed Development. Topics scoped out are identified in Chapter 2 of the ES.

3.3 LUC completed a Scoping Review Report in March 2024 which informed the Scoping Opinion published by LBS. The Scoping Opinion confirmed the acceptability of scoping most of these topics out, including:

- Ecology and biodiversity;
- Human Health;
- Internal Daylight, Sunlight and Overshadowing;
- Land Take and Soils;
- Major Accidents and Disasters;
- Waste and Materials; and
- Water Resources, Flood Risk and Drainage.

3.4 Clarifications were raised in the Scoping Review Report and subsequent Scoping Opinion regarding the approach to scoping out potential effects on the environment due to Light Pollution and Solar Glare. While this has not been subject to a stand-alone assessment in the ES, the Applicant has provided justification for this approach as detailed in Chapter 2, paragraph 2.27 and Chapter 10 of the ES.

Identification of Sensitive Receptors

3.5 Receptors and receptor sensitivity are identified within the technical chapters 6 – 14 and Volume 2 of the ES.

Alternatives including Iterative Design

3.6 Chapter 3 of the ES: ‘Alternatives and Design Evolution’ summarises the main alternatives to the Proposed Development which have been considered by the Applicant.

3.7 The chapter provides the local context for each environmental topic and highlights the future context based on

prevailing local plans which sets the scene. It also notes that these have been considered in the development of the design. This is welcomed.

3.8 Three alternative scenarios have been presented in the assessment:

- No Development / Do-nothing scenario: This section highlights the impact of leaving the Site as-is. The assessment notes that this will be undesirable as it will not be in alignment with LBS's strategic position for the site to deliver high quality housing, as the Site forms one of the allocated development opportunity sites in the LBS Local Plan. This is considered appropriate.
- Alternative Sites: No alternative sites have been considered, as the Applicant owns the Site, which is allocated in the LBS Local Plan for redevelopment. As a result, no other alternative site has been considered. This rationale is considered appropriate.
- Alternative Design and Evolution: The Applicant states that '*no reasonable or largely different alternative schemes or designs (as a whole for the site) were identified by the Applicant and the Applicant's design team which would warrant a comparison of environmental effects.*' However, the chapter highlights the considerations and principles that have guided the design of the Proposed Development. It also sets out the various layout iterations.

3.9 The initial layout which was developed following the project brief presentation to consultees in November – December 2022.

3.10 Following feedback from the consultation period, the Proposed Development was redesigned in May 2023 based on a new revised project brief formed in consultation with LBS officers.

3.11 This design has evolved to the current proposal, in line with the design principles and taking environmental considerations into account.

Description of Development

3.12 Chapter 4 of the ES describes the Proposed Development. This is supported by illustrative plans which show the general arrangement of the Proposed Development, the proposed elevations, landscape, floor and roof plans which help the reader understand the Proposed Development.

Consultation

3.13 Chapter 2 of the ES outlines that consultation has been carried out with LBS throughout the EIA Scoping process.

3.14 Consultation with the local community and various local stakeholders has also been undertaken and is presented in Chapter 3: 'Alternatives and Design Evolution'. This has informed the design of the Proposed Development.

3.15 Where relevant, Chapters 6 – 14 and volume 2 of the ES also provides a summary of consultation with stakeholders and consultees with respect to the relevant technical chapter.

Table 3.1 Summary of EIA Context and Influence

Ref.	Summary of Clarifications Required from Applicant
N/A	N/A.
Ref.	Summary of Potential Regulation 25 Requests from Applicant
N/A	N/A.
Ref.	Potential Planning Conditions
N/A	N/A.

Chapter 4

EIA Presentation

Overall Presentation (ES Quality)

- 4.1** Overall, the ES is well presented and clearly set out, making use of associated figures, maps and diagrams where required. There is a contents page accompanying the ES.
- 4.2** Details of the Proposed Development can be found in Chapter 4. An overview of the Site and surrounding area is also provided in Chapter 1 and Chapter 3.
- 4.3** There is generally a good use of figures and maps to show the location of the Site, its boundaries and the layout of the Proposed Development.
- 4.4** The length and structure of the ES is considered to be appropriate for the type and scale of the Proposed Development. The ES makes appropriate reference to the appendices when required.
- 4.5** A comprehensive glossary of key terms and abbreviations is included in Volume 3: Appendix: Introduction, Annex 3.

Non-Technical Summary

- 4.6** The NTS is provided as a standalone document. Presentation is clear, and the language used is generally non-technical. However, as is the case with the ES, some technical language is used throughout the document without any explanation to its meaning, which may prove unhelpful to a non-technical reader. No glossary or table of contents is provided in the NTS.
- 4.7** The NTS is of reasonable length and includes helpful use of aerial photos to describe the current context and to summarise the predicted significant effects. There is reasonable use of figures detailing the Proposed Development throughout, supplementing the main text of the NTS. The presentation of the NTS is acceptable.
- 4.8** Overall, the NTS provides sufficient information for a member of the public to understand the significant environmental effects of the Proposed Development without having to refer to the main text of the ES.

Table 4.1: Summary of EIA Presentation Review

Ref.	Summary of Clarifications Required from Applicant
N/A	N/A.
Ref.	Summary of Potential Regulation 25 Requests from Applicant
N/A	N/A.
Ref.	Potential Planning Conditions
N/A	N/A.

Chapter 5

Review of Chapter 5: Demolition and Construction

Scope of EIA

5.1 Chapter 5 of the ES as explained by the Applicant *'describes the indicative programme for the demolition and construction works, specifically the key activities that will be undertaken prior to the completion and operation of the Proposed Development. This chapter of the ES provides a description of the demolition and construction works for the purposes of identifying and assessing the potential demolition and construction related environmental impacts and resultant environmental effects of the Proposed Development'*. The assessment of impacts and effects of demolition and construction is discussed separately within each technical chapter topic.

5.2 Chapter 2: Paragraph 2.76 states that a Demolition and Construction Environmental Management Plan (DCEMP) will be secured through an appropriate planning condition, with key mitigation and management controls included in Chapter 17: Environmental Management, Mitigation and Monitoring Schedule. Chapter 5: Paragraph 5.3 states that an outline DCEMP has been prepared and submitted with the application, but we have **not been provided this document for review**. As a minimum, the Outline DCEMP must summarise and contain all measures set out in each Chapter, as listed in Chapter 17 of the ES, such that this may be secured through a planning condition and be subject to approval by LBS prior to commencement of the development **(DC1 and DC2)**.

5.3 The Applicant states that the DCEMP will remain a 'live working document' which is considered best practice and welcomed.

Programme of Works

5.4 The estimated programme of the Phase 1 and Phase 2 is provided.

5.5 As occupation will likely be phased, consideration of demolition and construction related effects on future residents should be considered. The introduction of phased receptors should be considered in all technical chapters of the ES.

Description of Works

5.6 The description of works provides a synopsis of the planned demolition and construction phases of the Proposed

Development. This includes due consideration of the following matters:

- Asbestos and Hazardous material, nesting birds, structural, highways utility, CCTV surveys;
- Unexploded Ordnance;
- Ground conditions and geotechnical constraints;
- Consents and licences;
- Construction phase logistics plans;
- Substructures;
- Superstructure;
- Internal fit-out; and
- Landscaping.

5.7 Paragraph 5.15 notes that an asbestos survey will be undertaken in conjunction with the Control of Asbestos regulations (CAR) 2012, relevant HSE guidance and ISO 17020 and 1702.; This is welcomed, and the asbestos contractor should be licenced under CAR 2012 as a minimum.

5.8 We would also expect to see an outline of construction methods such as piling and foundation types likely to be employed, construction traffic routing and working hours.

5.9 A Construction Logistics Plan (CLP) has been prepared in support of the planning application; however, **a copy of this was not available for review**. Chapter 17 lists the measures to be included within the detailed CLP secured by a suitable worded planning condition **(DC3 and DC4)**.

Waste

5.10 Construction phase waste is given consideration within the Chapter. Waste arising from the demolition, basement excavation/pile arisings and building construction are addressed separately. The demolition and construction waste characterisation seems reasonable, given the preliminary high-level assessment possible at this early stage in the process. Consideration of piling arisings is welcomed, for which volumes will be considerable.

5.11 The Applicant discusses their commitment to minimise waste generation in accordance with Waste & Resources Action Programme (WRAP's) 'Halving Waste to Landfill' initiative. It is unclear if the predicted waste volumes discussed have been calculated using WRAP's Net Waste Tool **(DC5)**.

5.12 There are various references to providing embedded mitigation of potential construction phase effects via the submission of a Project Waste Management Plan to the LBS secured by a planning condition; however, **a copy of this was not made available for review**. Clarification is sought regarding why this document does not form an appendix to the ES especially as Waste is scoped out of the ES **(DC6)**.

Mitigation

5.13 Chapter 17 states that a Dust management Plan (DMP) is to be included within the final DCEMP. Details on how the 'agreed' levels for dust parameters will be decided upon and the actions that would result in the event that the 'agreed' level of the parameters be breached are to be contained in the DCEMP **(DC7)**.

Table 5.1: Summary of Demolition and Construction Review

Ref.	Summary of Clarifications Required from Applicant
DC1	Clarification as to whether an Outline DCEMP will be made available to review
DC3	Clarification as to whether a Construction Logistics Plan will be made available to review
DC5	Clarification whether WRAP's Net Waste Tool was employed to calculate predicted waste volumes
DC7	Clarification of DMP parameters and agreed actions should the parameters be breached
Ref.	Summary of Potential Regulation 25 Requests from Applicant
DC6	As Waste is scoped out of the ES the Project Waste Management Plan should be included within the ES appendices
Ref.	Potential Planning Conditions
DC2	Submission of an Outline DCEMP pre-commencement along with a full DCEMP.
DC4	Submission of a Construction Logistics Plan.

Chapter 6

Review of Chapter 6: Socio-economics

Scope of EIA

6.1 Chapter 6 of the ES assesses the likely significant effects of the Proposed Development with regard to Socio-economics.

6.2 The proposed scope of the assessment considers effects during the demolition, construction and completed phases of the Proposed Development.

Baseline

6.3 The ES chapter defines the baseline for the assessment. Socio-economic conditions, sensitive receptors and the spatial scale considered in the assessment have been identified to enable the consideration of impacts on the community and local economy. The existing and future baselines are presented. Justification is provided for the inclusion of the geographical study areas selected for the assessment.

6.4 The assessment considers the population, housing, education (primary and secondary), primary healthcare, labour market, crime, and open space and play space. This is considered appropriate.

Assessment

6.5 The assessment takes into account relevant legislation and guidance set out in national, regional and local planning policy. It also makes use of the most recent available data sources. This is considered appropriate.

6.6 The ES assesses how the Proposed Development will affect existing businesses during the demolition and construction phases. It is noted that the Applicant has put arrangements in place to ensure that exiting businesses are aware of the processes the Applicant will take to support tenants in seeking out a new employment space. The Applicant also states that they are contractually obligated to ensure the continuity of the Morrisons supermarket at the Site.

6.7 It is considered that construction period is not permanent and that with the implementation of the Business Relocation strategy, any effects will be temporary in nature. The ES concludes that there will be a temporary minor adverse (not significant) effect, as a result of the Proposed Development.

6.8 It is noted that the Proposed Development will be completed in phases, and that access to the Morrisons

Supermarket and Peckham Bus Station will be maintained throughout the demolition and construction phases.

6.9 The ES also assesses how the Proposed Development will contribute to employment during the demolition and construction phases. It is noted that the construction work is not permanent and therefore any effects will be temporary in nature. The ES concludes that there will be a temporary negligible beneficial (not significant) effect on employment, as a result of the Proposed Development.

6.10 The ES considers a range of effects during the operational period (completed development) including provision of employment, housing delivery, population expenditure of additional residents, primary healthcare facilities, primary and secondary education provision, open and play space provision and crime.

Secondary, Cumulative and Combined Impacts

6.11 This section of the ES refers to the cumulative schemes listed in ‘Chapter 2: EIA Methodology’ of the ES.

6.12 Cumulative schemes are expected to generate additional employment and spending within the area. However, the ES is unable to quantify the level of employment that will be generated.

6.13 The cumulative assessment considers potential effects on several aspects following construction including employment, housing, social infrastructure (education, healthcare services, open and play space). The assessment concludes that no significant cumulative effects will arise, assuming other developments will be subject to S106 agreements to mitigate impacts. This is considered appropriate. However, it should be made clear that without mitigation, cumulative impacts on healthcare will be likely significant (**SE1**).

Mitigation and Management

6.14 No additional mitigation measures are identified for the demolition, construction and operational phases of the Proposed Development. This is considered appropriate as no significant adverse impacts are predicted.

6.15 Although a minor adverse effect is predicted on healthcare, the Applicant notes ‘primary healthcare is provided by the NHS and is funded by tax revenue as allocated to Primary Care Networks through Integrated Care Boards (ICB). If sufficient evidence is provided that justifies mitigation in line with LBS priorities, and in accordance with Regulation 122 of the Community Infrastructure Levy Regulations (2010) (As amended), Section 106 or Community Infrastructure Levy

spending could be directed towards health and education infrastructure.’

Non-Technical Summary

6.16 The NTS summarises the socio-economics assessment in non-technical language for the public to understand.

Table 6.1: Summary of Socio-economics review

Ref.	Summary of Clarifications Required from Applicant
SE1	It should be made clear that without mitigation cumulative impacts on healthcare will be adverse and significant.
Ref.	Summary of Potential Regulation 25 Requests from Applicant
N/A	N/A.
Ref.	Potential Planning Conditions
N/A	N/A.

Chapter 7

Review of Chapter 7: Traffic and Transport

Scope of EIA

7.1 Chapter 7 of the ES considers traffic and transport during the demolition, construction and operational phases. The scope of the assessment is considered adequate for the assessment of the potential effects of the demolition and construction stages and the completed development and aligns with the potential environmental effects set out the *Guidelines for the Environmental Assessment of Road Traffic (IEMA, 2023)*.

7.2 The traffic and transport key considerations sets out the potential environmental effects of the Proposed Development.

7.3 LUC is in agreement with the effects that have been scoped in / out for each of the development phases.

Baseline

7.4 As is standard practice, the baseline for the assessment has been defined as the future baseline, which has been derived through understanding of the existing baseline conditions and supplementing this through a review of the forecast evolution of the existing conditions into the future year.

7.5 The reviewer considers that the Study Area is suitable and that the baseline conditions have been appropriately defined including public transport and vehicle movements.

Assessment

7.6 The assessment has been carried out in line with the relevant guidance including:

- Guidelines for Environmental Impact Assessment, IEMA, 2004;
- IEMA (2023) Environmental Assessment of Traffic and Movement;
- LA104 Environmental Assessment and Monitoring, National Highways, 2020; and
- LA112 Population and human Health, National Highways, 2020.

7.7 The following potential effects have been scoped into the assessment for both demolition and construction, and the completed development:

- Severance of communities;
- Road vehicle driver and passenger delay;
- Non-motorised user delay;
- Non-motorised user amenity;
- Fear and intimidation; and
- Road user and pedestrian safety

7.8 LUC is in agreement with the methodology for defining effects including defining receptor sensitivity and magnitude of effects.

7.9 It is appropriate that receptors have been categorised into existing and introduced receptors and the level of sensitivity attributed to each is considered appropriate.

7.10 Each of the potential effects arising from the proposed net change in vehicle movements has been clearly described for both demolition and construction and completed development.

7.11 LUC considers that the assessment carried out on the environmental effects of the Proposed Development on traffic and transport is appropriate and in accordance with the relevant guidance.

7.12 The reviewer agrees with the assessment's conclusion that the moderate adverse delay and severance effects on non-motorised users of the existing site during demolition and construction are short-term and necessary to facilitate the construction of the Proposed Development which, once operational, will have significant beneficial effects on non-motorised users within the site with respect to severance and non-motorised user amenity, fear and intimidation. It is agreed that all other effects during demolition and construction are not significant.

7.13 It is agreed that all significant effects on non-motorised user severance, and amenity, fear and intimidation of the Completed Development will be beneficial. It is agreed that all other effects of the Completed Development are not significant.

Secondary, Cumulative and Combined Impacts

7.14 It is agreed that the identified cumulative schemes do not materially affect the study area.

Mitigation and Management

7.15 LUC is satisfied with the proposed embedded mitigation including (**TT1**):

- Outline Construction Logistics Plan;

- Demolition and Construction Environment /management Plan;
- Parking Design and Management Plan;
- Travel Plan;
- Delivery and Servicing Plan; and
- Section 278 works.

7.16 LUC agrees that no additional mitigation measures will be required.

Non-Technical Summary

7.17 The NTS summarises the traffic and transport assessment in non-technical language for the public to understand.

Table 7.1: Summary of Traffic and Transport review

Ref.	Summary of Clarifications Required from Applicant
N/A	N/A
Ref.	Summary of Potential Regulation 25 Requests from Applicant
N/A	N/A
Ref.	Potential Planning Conditions
TT1	LUC is satisfied with the proposed mitigation which includes a suite of Plans that will be secured via planning condition.

Chapter 8

Review of Chapter 8: Air Quality

Scope of EIA

- 8.1** Chapter 8 of the ES assesses the likely significant effects of the Proposed Development on Air quality.
- 8.2** The consultation section included in Chapter 8 of the EIA references the review of the Scoping Report in January 2024. The scope of the ES Chapter appears to address each of the comments raised.
- 8.3** The summary of legislation and policy provided in Chapter 8 is both comprehensive and appropriate.

Baseline

- 8.4** Baseline nitrogen dioxide (NO₂) monitoring surveys were carried out between August and November 2022 to establish the existing ambient pollutant concentrations at various locations within the study area. The purpose of the baseline survey was to inform the assessment and modelling of road traffic emissions. The survey also informed the site suitability assessment.
- 8.5** The survey locations presented in Figure 8.3 and Table 8.5 of the chapter are considered extensive and appropriate. The monitoring results captured during the survey has been summarised in ES Volume 3, Appendix Air Quality, Annex 11 and have been appropriately bias adjusted and annualised.

Assessment

- 8.6** Nearby receptors have been identified and their relative sensitivity. The sensitivity of all residential receptors have been identified as High Sensitivity, which is accepted.

Demolition and Construction Phase

- 8.7** The assessment uses the Greater London Authority's (GLA) guidance on 'The Control of Dust and Emissions during Construction and Demolition', and the latest guidance published by the Institute of Air Quality Management (IAQM) (V2.2).

Operational Phase

- 8.8** The approach set out for assessing operational impacts includes consideration of traffic related operational trips and on-site energy plant.

8.9 It is unclear, however, whether emissions from ventilation exhaust from the proposed basement vehicle parking have been included in the assessment modelling (**AQ1**).

8.10 With respect to dispersion mode verification and adjustment, it is stated that monitoring data from and made equivalent to 2022 was used for comparison of model results.

8.11 Paragraph 8.87 of the chapter recognises that monitoring results for years 2020 and 2021 are not relied upon in any way as they will not be representative of ‘typical’ air quality conditions due to the impact of the Covid-19 pandemic on traffic volumes, and thus pollutant concentrations.

8.12 The December 2023 IAQM Position Statement “Use of 2020 and 2021 Monitoring Datasets (V1.1) recommends that where in the local situation it is the members’ professional opinion that 2022 (or later year) monitoring data is likely to represent a post-pandemic baseline, any judgement on how representative the data are should be reported in (the) assessment.” It is recommended that this is included in the chapter or appendix as appropriate (**AQ2**).

Secondary, Cumulative and Combined Impacts

8.13 The effect of cumulative schemes has been considered in the assessment, detailed in Paragraphs 8.1.73 and 8.174 of Table 8.1: Summary of Air Quality Review

Ref.	Summary of Clarifications Required from Applicant
AQ1	Clarification as to whether emissions from ventilation exhaust from the proposed basement vehicle parking have been included in the assessment modelling.
Ref.	Summary of Potential Regulation 25 Requests from Applicant
AQ2	Inclusion of judgement on how representative the 2022 monitoring data are of a post-pandemic baseline.
Ref.	Potential Planning Conditions
AQ3	Planning condition relating to the need to consider potential odour mitigation from commercial kitchens should they be included within the supermarket, drinking establishment, and/or elsewhere within the site.
AQ4	Planning condition relating to the maximum number of hours testing that each emergency diesel generator is permitted.

the chapter. The assessment of cumulative effects for operational road traffic emissions is determined to be negligible (not significant).

Mitigation and Management

8.14 Measures to mitigate the impacts on dust and local air quality during the demolition and construction phase are considered comprehensive and appropriate.

8.15 It is recommended that a planning condition is placed on the Proposed Development relating to the need to consider potential odour mitigation from commercial kitchens should they be included within the supermarket, drinking establishment, and/or elsewhere within the site (**AQ3**).

8.16 It is also recommended that a planning condition is placed on the Proposed Development relating to the maximum number of hours testing that each emergency diesel generator is permitted (**AQ4**).

Non-Technical Summary

8.17 The NTS reflects the outcomes of the chapter.

Chapter 9
Review of Chapter 9: Noise and Vibration

Scope of EIA

9.1 Chapter 9 of the ES assesses the likely significant effects of the Proposed Development on Noise and Vibration.

9.2 The consultation section included in Chapter 9 of the EIA references the review of the Scoping Report in January 2024. The scope of the ES Chapter appears to address each of the comments raised.

9.3 The summary of legislation and policy provided in Chapter 9 is both comprehensive and appropriate.

Baseline

9.4 Baseline noise surveys were carried out between 3rd August and 8th August 2024 to establish the existing ambient and background noise levels at various locations within the study area. The purpose of the baseline survey was to inform the assessment criteria for the construction noise, operational plant and traffic noise assessments. The survey also informed the site suitability assessment.

9.5 The survey locations presented in Figure 9.1 and Table 9.1 of the chapter are considered extensive and appropriate.

9.6 The closest identified sensitive receptors (existing and proposed) have been separated into zones and presented visually in Figure 9.2 of the chapter, which is accepted.

9.7 The measurement data taken during the survey has been summarised in ES Volume 3, Annex 3. This is presented as broadband sound levels only and no octave band spectral data is provided.

Assessment

9.8 Details of national and local policy have been included in the chapter and the relevant British Standards and calculation methods have been used for the assessment.

9.9 Nearby receptors have been identified and their relative sensitivity. The sensitivity of all residential receptors and places of worship have been identified as High Sensitivity, which is considered acceptable.

Demolition and Construction Phase

9.10 Construction plant noise levels considered in the calculations are presented in ES Volume 3, Appendix: Noise and Vibration – Annex 4.

9.11 The assessment uses the ABC method to assess potential noise impact, which is the preferred approach. Calculations are separated into phases or ‘timeslices’ as referred to in the chapter.

9.12 The author notes that the modelled noise levels from demolition and construction works are in absence of any mitigation.

9.13 Predictions of demolition and construction noise, using plant items referenced in BS 5228, indicate a moderate to major significant effect for a number of receptors during specific works within the Site.

9.14 The author notes that the assessment of demolition and construction noise effects is based on a worst-case approach with all sources operating simultaneously. This is reasonable, however, it is recommended that a planning condition is secured requiring a Construction Environment Management Plan (DCEMP) and Construction Logistics Plan (CLP) which includes detailed calculations and mitigation measures to minimise noise impacts. **(NV1)**.

9.15 Due to the predicted exceedances and significance of effect, it is noted within the chapter that a Section 61 consent under the Control of Pollution Act will contain appropriate noise and vibration limits for demolition and construction activities at the nearby sensitive properties.

9.16 The vehicle movements and composition of HGVs have been used to calculate the change in noise levels due to the addition of construction traffic. The predicted increase in noise level will result in a negligible effect.

9.17 The author notes that the primary source of ground-borne vibration during demolition and construction is anticipated to be on-site piling activities.

9.18 The assessment uses surrogate data included in Annex D of BS 5228-2 including a range of ground conditions. The distances considered in this assessment are the closest assumed piling locations to the nearest receptor façade and the highest example data to represent a potential worst-case during the works.

9.19 Based on the above assumptions, the predicted effects are reported to be negligible to minor and not significant. When the distance increases beyond 20m, all receptors will experience a negligible impact.

Operational Phase

9.20 It is reported that noise attenuation will be implemented to ensure that the external noise from building services plant associated with the Proposed Development will achieve a low impact when assessed according to BS4142:2014 at the nearest noise sensitive receptor. A condition is recommended to assess the potential impacts of operational plant. This should include an updated baseline noise survey to establish background sound levels once the Proposed Development has been completed **(NV2)**.

9.21 The predicted change in noise level as a result of operational road traffic indicates a negligible effect on all of surrounding public roads.

9.22 It is noted that the proposed flexible retail, leisure and commercial uses (including drinking establishment premises) will be designed and managed such that the noise emission criteria agreed with LBS are satisfied. Such criteria will be agreed through appropriately worded planning conditions and licensing agreements. It is recommended that a planning condition is included to control noise from the proposed entertainment uses, with refence to NANR92 – Noise from Pubs and Clubs. **(NV3)**

9.23 Existing environmental noise levels have been modelled across the Site using the baseline environmental noise level data obtain during the survey.

9.24 A glazing and ventilation strategy is presented in Table 9.39 of the chapter, separated into zones identifying appropriate specification based on the measured and modelled external noise levels at each building façade, which is acceptable.

9.25 As noted above, the measured survey data is presented as broadband sound levels only and no octave band spectral data is provided.

9.26 It is noted that recommended internal noise levels can be achieved with the use of a suitable specification of building envelope, to achieve BS 8233 internal noise level criteria with windows closed and alternative ventilation provided.

9.27 A planning condition is recommended that is in accordance with the noise levels detailed in Table 4 *Internal ambient noise levels for dwellings* set out in BS 8233. Individual noise events should not exceed internal levels of 45dB L_{Amax,F} more than 10 times a night. **(NV4)**. This should include an updated survey to include octave band data, to inform mitigation measures, including potential noise impacts during overheating conditions.

Secondary, Cumulative and Combined Impacts

9.28 The effect of cumulative schemes has been considered in the assessment, detailed in Table 9.2 of the chapter. The assessment of cumulative effects for operational road traffic noise is determined to be negligible (not significant).

Mitigation and Management

9.29 Construction noise and vibration is discussed and will follow a Best Practicable Means (BPM) approach, and it is suggested that a CEMP is produced and required by a planning condition, as noted at **(NV1)**.

9.30 Principles of mitigation for fixed plant and equipment are discussed as the plant is not yet known. These would form part of the planning condition noted at **(NV2)**.

9.31 A glazing and ventilation strategy has been proposed. Planning condition **NV4** has been recommended to ensure suitable internal living conditions, including appropriate ventilation and the control of noise impact during overheating conditions are achieved.

Non-Technical Summary

9.32 The NTS reflects the outcomes of the chapter.

Table 9.1: Summary of Noise and Vibration Review

Ref.	Summary of Clarifications Required from Applicant
N/A	N/A.
Ref.	Summary of Potential Regulation 25 Requests from Applicant
N/A	N/A.
Ref.	Potential Planning Conditions
NV1	It is recommended that a planning condition requiring a Construction Environment Management Plan and Construction Logistics Plan, which includes detailed calculations and mitigation measures, should be secured to minimise noise impacts.
NV2	A planning condition to control noise from mechanical plant to be assessed in accordance with the approach set out in BS4142:2014 should be secured. An updated survey is recommended to establish background sound levels once the development is constructed.
NV3	It is recommended that a planning condition is secured to control noise from the proposed entertainment uses, with reference to NANR92 – Noise from Pubs and Clubs
NV4	A planning condition is recommended that is in accordance with the noise levels detailed in Table 4 <i>Internal ambient noise levels for dwellings</i> set out in BS 8233. Individual noise events should not exceed internal levels of 45dB L _{Amax,F} more than 10 times a night. (NV4) . This should include an updated survey to include octave band data, to inform mitigation measures, including potential noise impacts during overheating conditions.

Chapter 10

Review of Chapter 10: Daylight, Sunlight and Overshadowing

Scope of EIA

10.1 The proposed methodology and approach for the topic of Daylight, Sunlight & Overshadowing (DSO) was examined by Urban Light Surveyors (ULS) as part of the scoping review and generally concluded as robust and acceptable.

10.2 The ULS DSO scoping review sought clarification as to how the list of sensitive receptors was arrived at and that non-domestic building types sensitive to these effects were also included (examples given were education and care facilities).

10.3 These are not included in Chapter 10 and therefore the request for clarification remains. **(DSO1)**

10.4 The ULS DSO review sought clarification regarding whether there were any external amenity spaces sensitive to these types of effect (examples given of properties located on Rye Lane, Peckham High St and McKerrell Road).

10.5 The authors of Chapter 10 subsequently confirmed all areas identified from external inspection were included in the scope.

10.6 The ULS DSO review suggested the phased nature of the development may warrant consideration of interim effects of subsequent phases to earlier occupants.

10.7 The cumulative scenario stated that it only considered office to residential conversions giving rise to less than 150 units. ULS do not agree with this arbitrary cut—off and instead consider all such developments should be included in the scope, regardless of quantum of units.

10.8 The consultation section of Chapter 10 confirms that the distance (as opposed to number of units) has meant that there are no cumulative developments which require consideration.

10.9 The authors of Chapter 10 advise that an alternative target of 15%VSC was discussed with LBS case officers in the pre-application process.

Baseline

10.10 Chapter 10 states the baseline as being the current site conditions at the time of the planning submission (i.e. June 2024). Volume 3: Appendix: Daylight, Sunlight and Overshadowing: Annex 1, Drawing P2713/02 shows the baseline site model used.

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10.11 This is an agreed approach and confirmed by on-site inspection.

10.12 The Chapter sets out the result of the baseline DSO conditions at tables 10.6 “Summary Baseline VSC Results”, 10.7 “Summary Baseline NSL Results”, 10.8 “Summary Baseline APSH Results” & 10.9 “Summary Baseline Overshadowing Results”.

10.13 In general terms these vary quite considerably, depending on the relationship of the sensitive receptor with the site and its design.

10.14 For example, where these are located adjacent the built section of the baseline site and self-obstructed, they will record DSO values which do not achieve the advisory BRE values. Conversely, where these are not self-obstructed and located opposite the surface car park, baseline DSO values will materially exceed the advisory BRE values.

10.15 As such any comprehensive, policy-led and efficient redevelopment would inevitably have significant DSO effects.

10.16 It is therefore agreed that the emphasis in such cases is on retained DSO values.

10.17 It is not to say that the degree of change is ignored but rather, as set out in the BRE guidelines, that the advisory targets are unlikely to be appropriate in the circumstance and therefore an alternative means of judging DSO effects acceptability is required.

Assessment

10.18 The existing sensitive receptors that were assessed for impacts to baseline Daylight & Sunlight and Overshadowing are shown in Figure 10.1 and 10.2, respectively.

10.19 As would be expected, the Completed Development produces significant DSO effects, as set out in tables 10.10 “Existing Baseline + Proposed Development VSC Summary”, 10.11 “Existing Baseline + Proposed Development NSL Summary” & 10.12 “Existing Baseline + Proposed Development APSH Summary”.

10.20 The Table below summarises these.

	Receptor Assessed	Negligible	Minor Adverse	Moderate Adverse	Major Adverse
Daylight (VSC)	905	495 (55%)	102 (11%)	89 (10%)	219 (24%)
Daylight (NSL)	694	549 (79%)	35 (5%)	26 (4%)	84 (12%)

	Receptor Assessed	Negligible	Minor Adverse	Moderate Adverse	Major Adverse
Sunlight (APSH)	302	276 (91%)	11 APSH 2 WPSH	2 APSH 1 (WPSH)	10 APSH 23 WPSH

10.21 The ES chapter summarises that 11 of the 58 properties assessed (i.e. 19%) would experience negligible **daylight** effects and 20 or 26 (i.e. 77%) would experience negligible **sunlight** effects.

10.22 As such, 47 (i.e. 81%) would experience between **minor and major adverse daylight effects**.

10.23 As set out above, such a figure would be expected given the baseline conditions and relationship/ design of existing neighbours. Overall significance of these effects is therefore agreed as being based primarily on the retained values.

10.24 In addition, as set out in national planning policy the overall policy aims for the site/ need for change will also inform the acceptability as part of an on-balance judgement. In other words, greater allowance or flexibility may be required when judging DSO effects against the positive aspects of the regeneration scheme.

10.25 ULS agree with the summary/ conclusions for the following properties which would experience between **minor and major** adverse DSO effects, subject to clarification on how room uses quoted as providing mitigation (i.e. bedrooms) were established (**DSO2**), and how the quoted short term tenure as providing mitigation was established (**DSO3**). Overall effect to Sunlight Hours On Ground (SHOG) is agreed, pending confirmation of no garden to the rear of 85 Peckham High St (**DSO4**).

Acceptable Assessment

10.26 ULS agree that the assessment of named receptors below is acceptable on balance due to retained values/ self-obstructed design:

- Purdon House;
- Flamborough House;
- 46 Hanover Park;
- 44 Hanover Park;
- 11-12 Robert Keen Close;

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- 40 Hanover Park (agreed on the basis that the assumed uses were robustly established) **DSO2**;
- 30-36 Hanover Park (agreed on the basis that the assumed uses were robustly established) **DSO2**;
- 28 Hanover Park (agreed on the basis that the assumed uses were robustly established) **DSO2**;
- 26 Hanover Park (agreed on the basis that the assumed uses were robustly established) **DSO2**;
- 24 Hanover Park (agreed on the basis that the assumed uses were robustly established) **DSO2**;
- 22 Hanover Park (agreed on the basis that the assumed uses were robustly established, DSO impacts need to be considered in the wider context of the benefits of the development) **DSO2**;
- 22 Hanover Park (agreed on the basis that the assumed uses were robustly established, DSO impacts need to be considered in the wider context of the benefits of the development) **DSO2**;
- 81 Hanover Park (agreed pending confirmation of the nature of tenure) **DSO3**;
- 20 Hanover Park (agreed on the basis that the assumed uses were robustly established, DSO impacts need to be considered in the wider context of the benefits of the development) **DSO2**;
- 14-16 Hanover Park;
- 43 Rye Lane (DSO impacts need to be considered in the wider context of the benefits of the development);
- 45 Rye Lane;
- 20 Rye Lane;
- 18 Rye Lane;
- 8-10 Rye Lane (DSO impacts need to be considered in the wider context of the benefits of the development);
- 6 Rye Lane (DSO impacts need to be considered in the wider context of the benefits of the development);
- 4 Rye Lane (DSO impacts need to be considered in the wider context of the benefits of the development);
- 2 Rye Lane (DSO impacts need to be considered in the wider context of the benefits of the development);
- 5 Central Buildings (DSO impacts need to be considered in the wider context of the benefits of the development);
- 3 Central Buildings;
- 74 Peckham High St;
- 86 Peckham High St;

- 88 Peckham High St;
- 90 Peckham High St;
- 92 Peckham High St;
- 96 Peckham High St;
- 102 Peckham High St;
- 114 Peckham High St;
- 116 Peckham High St;
- 118 Peckham High St;
- 120 Peckham High St;
- 122 Peckham High St;
- Dunstall House; and
- Overall effect to SHOG (Pending confirmation of no garden to the rear of 85 Peckham High St) (**DSO4**)

Disagree with conclusion

10.27 ULS disagrees with the assessment conclusions for the reasons set out below, which means significant effects may have been under-reported in the ES (**DSO5**):

- *18a & 18b Rye Lane*- The overall effect is reported as tending towards **minor adverse**. The **moderate and major adverse NSL effects** would in our view tend towards a **moderate adverse effect overall**;
- *14-16 Rye Lane* - The overall effect is reported as tending towards **minor adverse**. All windows and rooms would experience a **major adverse** impact, therefore the impact tends towards **major adverse**;
- *12-12a Rye Lane* - The overall effect is reported as tending towards **minor adverse**. All windows and 1 room would experience a **major adverse** impact, with 2 rooms experiencing a **minor and moderate adverse** effect. Therefore the impact tends towards **moderate adverse**;
- *4 Central Buildings* overall effect is reported as tending towards **minor adverse**. The effects tend more towards **moderate adverse** given the effects to NSL;
- *98 Peckham High St* - The overall effect is reported as tending towards **minor adverse**. Both windows and one room would experience a **moderate adverse** effect, therefore the overall impact is considered to tend towards **moderate adverse**;
- *104 Peckham High St* - The overall effect is reported as tending towards **minor adverse**. The room assessed would experience a **major adverse** NSL effect and also a **moderate adverse** VSC effect. The overall effect is

- therefore considered to tend towards **moderate adverse**;
- *106 Peckham High St* - The overall effect is reported as tending towards **negligible**. All windows would experience a **moderate adverse** VSC effect. The overall effect is therefore considered to tend towards **minor adverse**;
 - *108 Peckham High St* - The overall effect is reported as tending towards **moderate adverse**. All windows would experience a **moderate to major adverse** VSC effect. The rooms they serve would experience between **minor adverse NSL effect** and **major adverse NSL effect**. The overall effect is therefore considered to tend towards **major adverse**;
 - *110 Peckham High St* - The overall effect is reported as tending towards **minor adverse**. The overall effect is considered to tend towards **moderate adverse**; and
 - *112 Peckham High St* - The overall effect is reported as tending towards **moderate adverse**. The overall effect is considered to tend towards **major adverse**.

Secondary, Cumulative and Combined Impacts

10.28 The ES states the distance of the cumulative developments from the site means there would be no

combined DSO effects in conjunction with the Completed Development, therefore no cumulative assessment was conducted.

Mitigation and Management

10.29 The ES states that practical mitigation measures were considered as part of the design process and reflected in the Completed Development, therefore no additional mitigation is required.

Non-Technical Summary

10.30 The NTS summarises the above effects, concluding the vast majority of windows i.e. 79% would retain in excess of the agreed alternative target of at least 15%VSC.

10.31 As predicted by the BRE, when making efficient use of an unusually low-rise site in an urban context it is inevitable that the advisory targets would not be met.

10.32 The BRE guidance and planning policy relating to DSO effects therefore suggest the need for practical flexibility when interpreting results which do not meet the advisory recommendations.

Table 10.1: Summary of Daylight, Sunlight and Overshadowing Review

Ref.	Summary of Clarifications Required from Applicant
DSO1	Confirmation of determination of sensitive receptors, including any non-residential uses
DSO2	How room uses quoted as providing mitigation (i.e. bedrooms) were established.
DSO3	How short-term tenure quoted as providing mitigation was established at 81 Hanover Park.
DSO4	Confirmation of no SHOG sensitive receptor to the rear of 85 Peckham High St.
Ref.	Summary of Potential Regulation 25 Requests from Applicant
DSO5	Disagreement with categorisation of effects as these relate to moderate/ major effects, which means significant effects may have been under-reported in the ES.
Ref.	Potential Planning Conditions
N/A	N/A

Chapter 11

Review of Chapter 11: Wind Microclimate

Scope of EIA

11.1 Chapter 11 of the ES assesses the likely significant effects of the Proposed Development on Wind Microclimate.

11.2 An EIA has been undertaken to identify what potential environmental effects might exist during the demolition and construction phases of the Proposed Development. Wind microclimate has been scoped into the EIA as it has been identified as a key environmental consideration in the planning stages.

11.3 The main report wind microclimate chapter is supported by the following documents:

- ES Volume 3: Technical Appendices - Introduction;
- ES Volume 3: Appendix: EIA Methodology; and
- ES Volume 3: Appendix: Wind Microclimate – Annex 1: Wind Microclimate Assessment (Annex 1 – WMA).

11.4 Policy and Legislation guidance with respect to Wind Microclimate are addressed in paragraph 23 of ES Volume 3: Appendix: Wind Microclimate – Annex 1: Wind Microclimate Assessment (hereafter Annex 1 – WMA). The National Planning Policy Framework (NPPF), The London Plan (2021), and the Southwark Plan (2022) are widely used and acceptable sources of guidance with respect to Wind Microclimate assessments in the region. Given the location of the Site, the list of references in paragraph 23 in Annex 1 - WMA should include the City of London Wind Microclimate Guidelines.**(WM1)**

11.5 A 1:400 scale 3D model of the Site, with radius of 500m from the centre of the Site was designed and used in wind tunnel studies by Windtech Consultants at their boundary layer wind tunnel facility. The model consists of a 3m wide section and a fetch length of 14m. This is an acceptable model setup, and typical for urban studies in the London region. The details of the wind tunnel set up are provided in Annex 1 – WMA (Chapter 2) and are well presented.

11.6 The assessment methodology covers four different Site Configuration Scenarios:

- Scenario 1: Existing Site Condition (Baseline);

- Scenario 2: Interim Phase of the Proposed Development with Existing Surrounds;
- Scenario 3: Completed Proposed Development with Existing Surrounds; and
- Scenario 4: Completed Proposed Development with Existing Surrounds and Proposed Landscaping.

11.7 There are no cumulative schemes identified within the 500m radius from the centre of the Site that would normally require a cumulative assessment. This is considered acceptable. Furthermore, cumulative schemes within the surrounds that are already under construction are labelled as existing surrounding buildings.

11.8 The surrounding terrain around the Site is shown in Figure 4 of Annex 1 - WMA at radii of 5km and 50km from the edge of the proximity model. These have been divided into different sectors which correspond to the angular resolution used for the wind tunnel testing.

11.9 Windspeeds were measured at the probe locations from 36 directions with 10-degree increments. This provides acceptable resolution for Wind Microclimate studies, as set out in the City of London Wind Microclimate Guidelines document.

11.10 A total of 136 years of wind climate data has been collected from meteorological stations located at Heathrow, Gatwick, and Stansted Airports. This data is then corrected to provide the wind conditions over standard open terrain at a height of 10m above ground. The correction factors for each wind direction are provided in Table 2 of Annex 1 - WMA, with the corresponding wind roses for the Hourly Mean Wind Speeds using the annual wind data, summer wind data (i.e., best case scenario) and winter wind data (i.e., worst case scenario) shown in Figure 4 in Annex 1 - WMA. These show that the prevailing winds comes from the southwest direction. There looks like to have been a typographic error when referring to the number of years of processed wind data – please clarify (**WM2**).

11.11 The Applicant has provided a very high level of detail in Chapter 5 of Annex 1 - WMA. in clarifying how the wind tunnel results will be checked. A very clear distinction has been made in the difference between assessing results using Pedestrian Comfort and Pedestrian Safety criteria. These are done via the City Lawson Criteria – Comfort, and the City Lawson Criteria – Safety judgments, both of which are frequently used in assessing wind microclimate.

11.12 Paragraph 12 of the Wind Microclimate Topic Sheet at p.88 of Annex C of the Scoping Report (ES Vol 3: Annex 1) provides a list of the different areas across the Site identified as key receptor positions. In total, there are 150 receptors across the Site when the Proposed Development is introduced (i.e., Scenarios 2-4). Prior to its inclusion, the Baseline

scenario assessed 82 probe location points. The chosen points were pre-identified as the most critical outdoor locations to measure the wind. Paragraph 11.35 of ES Chapter 11 mentions that 148 probe point locations are chosen, yet there are results for 150 different points. This is another potential typographic error – please clarify (**WM3**).

11.13 Initial testing was undertaken during the design stage to identify what possible mitigation measures might be required to combat adverse wind conditions. This testing consists of both wind tunnel testing, and Computational Fluid Dynamics (CFD) approaches, with the latter undertaken using ENGYS Helyx and done so to provide the design team with some predictions of the surrounding wind conditions.

Baseline

11.14 The results for Scenario 1 (Baseline) demonstrate that the wind conditions at ground level do not exceed the safety criterion within the Site and surroundings throughout the year.

11.15 The different receptor types and corresponding receptor reference point for Scenario 1 are summarised in Table 11.5 of ES Chapter 11.

Assessment

11.16 The scale of on-site wind measurement locations is defined by comparing the wind comfort/safety levels with the intended pedestrian activity and is summarised in Table 11.3 of ES Chapter 11.

11.17 Figures 5a-e of Annex 1 - WMA reports no uncomfortable sensitive receptors at the Site in Scenario 3 (Completed Proposed Development with Existing Surrounds) at ground level, elevated amenity, elevated balcony low, elevated balcony top, and elevated terraces top. The tested landscaping and wind mitigation measures included during current wind tunnel testing for Scenario 4 (Completed Proposed Development with Existing Surrounds and Proposed Landscaping) are shown in Figures 5f-j. For consistency with presentation of results in Figure 5, the Applicant should include the Scenario number in the caption for Figures 5a-e in addition to using the full textual description of what the scenario corresponds to (**WM4**).

11.18 There are two reported receptor points when the safety threshold is breached for Scenario 2 (Interim Phase of the Proposed Development with Existing Surrounds). These are at location points positioned at two elevated levels, namely, Points 91 and 147. All other areas are safe for pedestrians throughout the year in this Scenario. These two points would require mitigation measures to combat the effect of these strong winds.

ensure that constructions workers are protected, with the public being kept safely away. This is acceptable and common practice during demolition and construction phases.

Mitigation and Management

11.24 Given that safety measures are put in place for construction workers and the everyday public will have no access to the areas undergoing demolition or construction, no additional wind mitigation measures are required during the demolition and construction phase. This is considered acceptable.

11.25 Proposed mitigation for Configurations 2 and 4 are provided in Tables 11.7 and 11.8 of Chapter 11, respectively. The applicant should present a similar table for proposed mitigations in Scenario 3, as done for Scenarios 2 and 4 (**WM6**). Note that there is a referencing error in Paragraph 11.125 of Chapter 11(**WM7**) and the correct reference should be provided.

11.26 Even with the recommended mitigations implemented, current testing shows that there remain some areas of adverse wind comfort and safety conditions on-site. This has led to the recommendation of additional on-site mitigations for Scenarios 2, 3, and 4 (e.g., balustrades and/or soft landscaping), in coordination with the design team. These measures are detailed in Paragraphs 11.134-11.137 of Chapter 11 and the efficacy of these measures are to be tested with further wind tunnel or CFD testing. It is anticipated that with these additional on-site mitigations, all areas of the proposed development will be safe. (WM8) The implementation of balustrades and/or soft landscaping for each Scenario could require a Potential Regulation 25 Request.

Non-Technical Summary

11.27 The NTS provides a clear and concise summary of the points discussed in the report.

11.19 Figures 11.15-11.20 of Chapter 11 show the Lawson Comfort Criteria results for Scenario 2, with the corresponding Lawson Safety Criteria plots for Scenario 2 shown in Figures 11.21-11.25. The demarcation using the colours is a neat way to present the results but cannot be visualised by someone who is colour blind. The Applicant should categorise the different probe points and the associated Comfort and Safety Levels using different marker styles to improve accessibility (**WM5**).

11.20 The results for Scenario 3 (Completed Proposed Development with Existing Surrounds) indicate that the wind conditions at three elevated levels do exceed the safety criterion, namely, Points 20, 102, and 143. Figures 11.26-11.31 of Chapter 11 show the Lawson Comfort Criteria results for Scenario 3, with the corresponding Lawson Safety Criteria plots for Scenario 3 shown in Figures 11.32-11.36. These two points would require mitigation measures to combat the effect of these strong winds.

11.21 The results for Scenario 4 (Completed Proposed Development with Existing Surrounds and Proposed Landscaping) indicate that the wind conditions at two elevated levels do exceed the safety criterion, namely, Points 102, and 143. Figures 11.37-11.42 of Chapter 11 show the Lawson Comfort Criteria results for Scenario 4, with the corresponding Lawson Safety Criteria plots for Scenario 4 shown in Figures 11.43-11.47. These two points would require mitigation measures to combat the effect of these strong winds.

Secondary, Cumulative and Combined Impacts

11.22 The cumulative schemes buildings are listed in Table B1 of the Scoping Report (ES Vol 3 Annex 1) along with their associated planning number and stage of progress.

11.23 It is stated in paragraph 11.118 of ES Chapter 11 that access will be restricted during demolition and construction, with expected health and safety measures put in place to

Table 11.1: Summary of Wind Microclimate Review

Ref.	Summary of Clarifications Required from Applicant
WM1	Given the location of the Site, the list of references in Paragraph 23 in Document 6 should include the City of London Wind Microclimate Guidelines.
WM2	There looks to have been a typographic error when referring to the number of years of processed wind data – please clarify.
WM3	Paragraph 11.35 of Document 1 mentions that 148 probe point locations are chosen, yet there are results for 150 different points. This is another potential typographic error – please clarify.
WM4	For consistency with presentation of results in Figure 5, include the Scenario number in the caption for Figures 5a-e in addition to using the full textual description of what the scenario corresponds to.

WM5	The demarcation using the colours is a neat way to present the results but cannot be visualised by someone who is colour blind. Is it possible to categorise the different probe points and the associated Comfort and Safety Levels using different marker styles?
WM6	Why is there no presentation of a similar table for Scenario 3 for proposed mitigations, as has been done for Scenarios 2 and 4?
WM7	Note that there is a referencing error in Paragraph 11.125 of Document 1, and the correct reference should be provided.
Ref.	Summary of Potential Regulation 25 Requests from Applicant
WM8	The implementation of balustrades and/or soft landscaping for each Scenario could require a Potential Regulation 25 Request
Ref.	Potential Planning Conditions
N/A	N/A.

Chapter 12

Review of Chapter 12: Archaeology

Scope of EIA

12.1 Chapter 12 of the ES assesses the likely significant effects of the Proposed Development on Archaeology.

12.2 The proposed methodology and approach for this topic were reviewed by LUC as part of the Scoping Review in January 2024. Key points from the topic review were incorporated in the LBS's Scoping Opinion which also requests the Applicant to follow the detailed content of the advice in the Scoping Review Report.

12.3 The consultation summary (page.12.1), notes that the approach to the setting of archaeological assets has been clarified with LBS's archaeology advisor, who advised that consideration of the setting of archaeological assets was not necessary in this instance and therefore no further discussion has been provided within the ES chapter. Given the confirmation sought from the advisor, this approach is considered acceptable.

12.4 A list of guidance applied in carrying out the assessment is not provided, although various sources are referenced in footnotes. It would not normally be recommended to apply the guidance in the Design Manual for Roads and Bridges given that it is written specifically for that type of development, which is not applicable here. Explanation should be provided that the assessment follows an appropriate, agreed source such as IEMA, IHBC, ClfA's 2021 Principles of Cultural Heritage Impact Assessment in the UK and/ or GLA 2023 Planning Practice Note: Heritage Impact Assessments and the Setting of Heritage Assets (**ARCH01**). Confirmation of the full list of sources applied should be provided. (**ARCH02**)

Baseline

12.5 An appropriate range of sources has been consulted in identifying baseline conditions.

Assessment

12.6 The introductory table (page 12.1) notes that standard terminology is used by MOLA to differentiate between the 'significance' of a buried heritage asset and the 'significance of an effect'. However, the application of these terms in the methodology (paragraph 12.2-12.4) and in the accompanying Desk-Based Assessment (ES Volume 3: Appendix: Archaeology: Annex 1) demonstrates some problems with the

proposed approach to identification of significant effects. It appears to confuse the heritage significance (the sum of heritage values) and the importance (the level of designation) of assets. Application of this differentiation between ‘significance’ and ‘importance’, as per IEMA, IHBC, ClfA’s 2021 Principles of Cultural Heritage Impact Assessment in the UK, is recommended.

12.7 Mention is made of the definitions of heritage value given in Conservation Principles (Historic England 2008) and NPPF. However, these have not been applied in the DBA ‘Statement of Significance’, section 5; the Gazetteer, section 8; nor elsewhere in the assessment, which discuss only likelihood of presence and potential importance of different types of asset. There is a missing step between the explanation of importance and sensitivity; as a result the understanding of the specific effects likely to be caused by the Proposed Development to the heritage significance of the archaeology is not communicated clearly. Further information on the ascription of heritage value should be provided to make conclusions clear – i.e. to explain the link between the assessment of heritage significance and the significance of effect (**ARCH03**).

Secondary, Cumulative and Combined Impacts

12.8 The Scoping Opinion requested cumulative impacts are considered and the approach described at paragraphs 12.73-12.75 appears broadly appropriate. However, confirmation that this approach has been agreed with the LBS archaeology advisor should be provided (**ARCH04**).

Mitigation and Management

12.9 It is noted that recording as mitigation is intended to off-set the harm caused by physical change which is otherwise unavoidable. The recording process does not reduce the harm caused to the historic environment, even if it has collateral public benefits. The residual level of harm remains the same in such a case and the approach to reduction of level of effect suggested at paragraph 12.29 is therefore not appropriate. The public benefits of recording could be counted separately in the overall planning balance, but this is a matter for the decision-maker and should not be incorporated into the individual effects. Conclusions on residual effects to archaeology should be amended accordingly (**ARCH05**).

Non-Technical Summary

12.10 As a result of the further information requested at ARCH05, changes may be required to the NTS. These should be incorporated into an amended NTS, if found to be required (**ARCH06**).

Table 12.1: Summary of Archaeology review

Ref.	Summary of Clarifications Required from Applicant
ARCH01	Explanation should be provided that the assessment follows an appropriate, agreed source such as IEMA, IHBC, ClfA’s 2021 Principles of Cultural Heritage Impact Assessment in the UK and/ or GLA 2023 Planning Practice Note: Heritage Impact Assessments and the Setting of Heritage Assets.
ARCH02	Confirmation of the full list of sources applied should be provided.
ARCH04	Confirmation should be provided that the approach to cumulative assessment has been agreed with the LBS archaeology advisor.
Ref.	Summary of Potential Regulation 25 Requests from Applicant
ARCH03	Further information on the ascription of heritage value should be provided to make conclusions clear – i.e. to explain the link between the assessment of heritage significance and the significance of effect. Application of the differentiation between ‘significance’ and ‘importance’, as per IEMA, IHBC, ClfA’s 2021 Principles of Cultural Heritage Impact Assessment in the UK, is recommended to help achieve clarity.
ARCH05	Conclusions on residual effects to archaeology should be amended to remove inappropriate reduction of level of harm ascribed to off-setting measures.
ARCH06	As a result of the further information requested at ARCH05, changes may be required to the NTS. These should be incorporated into an amended NTS, if found to be required.
Ref.	Potential Planning Conditions
	To be confirmed under advice from LBS’ archaeology adviser.

Chapter 13

Review of Chapter 13: Ground Conditions and Land Contamination

Scope of EIA

13.1 Chapter 13 of the ES assesses the likely significant effects of the Proposed Development of Ground Conditions and Land Contamination.

13.2 The scope of the ES chapter is considered sufficient, in that it covers the range of typical impacts and effects on ground conditions that may be expected of such a study given the brownfield nature of the Site, presence of worked ground and the number of potentially contaminative former uses. Existing/ former uses of the Site include a historical garage, historical and current electricity substations, existing buildings, as well as an associated car park and petrol station/car wash.

13.3 The proposed study area of the Site is defined in paragraph 13.1 as a 2km radius determined by mapping. Further explanation as to the justification of this selected study area extent is required **(GC1)**.

Baseline

13.4 The baseline uses a review of the Phase 1 LCA (ES Volume 3, Appendix: Ground Conditions and Land Contamination) to summarise historic and current potentially contaminative land uses as well as the geology/hydrology/hydrogeology and conceptual model of the Site.

13.5 Consultation has been undertaken with the Environment Agency and LBS in Appendix E and F of the Phase 1 LCA. which is welcomed However, there is no consultation noted with a petroleum licencing officer which is recommended **(GC2)**.

Assessment

13.6 The assessment considers demolition, construction and operational phases. The inclusion of an assessment of a changing future baseline in response to climate change would be best practice, though not a formal requirement.

13.7 Definitions of receptor sensitivity, magnitude of change and significance are thorough and welcomed.

13.8 Table 13.4 of existing receptor sensitivity should clarify if groundwater includes the Lambeth group only or the Thanet Sands Secondary A aquifer and underlying Chalk principal aquifer **(GC3)**.

13.9 Paragraph 13.73 states that potential effects as a result for demolition and construction works from UXO would be local, temporary and short-term. Potential UXO effects on construction workers, nearby residents and buildings/infrastructure would not be short-term or temporary **(GC4)**.

13.10 The Proposed Development includes a significant degree of excavation, down into the lacustrine deposits and Lambeth Group. This will likely require a significant degree of dewatering. The presence of a large new basement also has the potential to impact on local groundwater flows and behaviour. Due to the potential for gross contamination beneath the Site, the management of this during the Proposed Development is critical.

13.11 Due To the extent of subsurface excavation to be undertaken, the inclusion of a Basement Impact Assessment report in Appendix: Ground Conditions and Land Contamination Annex 3, is welcomed. The report is thorough and considers the impact on nearby sensitive receptors.

Secondary, Cumulative and Combined Impacts

13.12 In-combination impacts from surrounding developments are discussed in Chapter 15, however effects relating to Ground Conditions and Contamination has not been included **(GC5)**.

13.13 Cumulative effects are discussed in paragraphs 13.157-13.161 summarising that there will be no impact to ground conditions on surrounding sites or on the Proposed Development. Consideration is also given to potential minor beneficial impacts including the remediation of potential contamination in the surrounding area.

Mitigation and Management

13.14 Provision of a Demolition and Construction Environment Management Plan (DCEMP), a Phase II intrusive investigation and Asbestos refurbishment/demolition survey all secured by a planning condition is welcomed **(GC6)**.

13.15 We would suggest rewording paragraph 13.133 'contamination conditions' to 'extent of potential contamination' to clarify that currently contamination has not been found on site as no intrusive investigation has taken place.

13.16 Provision of a remediation strategy, verification report and foundation works risk assessment (including a piling method statement) is welcomed and should also be secured by appropriate planning conditions **(GC7)**.

13.17 Paragraph 13.140 provides no commentary of the mitigation measures for receptors such as surface water, construction works and nearby residents **(GC8)**.

13.18 A UXO Risk Management Plan is welcomed and should be subject to appropriate planning consents stating that the survey must be undertaken prior to breaking ground. Appropriate watching briefs/ UXO provisions on all future site investigations should be employed **(GC9)**.

Non-Technical Summary

13.19 The NTS provides an acceptable summary of the programme and mitigation measures of the demolition and construction phase, notwithstanding the limitations of the main ES chapter as discussed above.

13.20 The NTS will need updating with respect to the additional clarifications information required as detailed within this review **(GC10)**.

Table 13.1: Summary of Ground Conditions and Land Contamination Review

Ref.	Summary of Clarifications Required from Applicant
GC1	Further explanation as to the justification of this selected study area extent is required.
GC2	Clarification whether consultation with a petroleum licencing officer is to be undertaken.
GC3	Clarification whether the groundwater receptor includes consideration of the Thanet Sands Secondary A aquifer and underlying Chalk Principal aquifer.
GC4	Revision of UXO potential effects classifications, as a result for demolition and construction works.
GC8	Inclusion of mitigation measures for receptors such as surface water, construction works and nearby residents in Paragraph 13.140.
GC10	Update to the NTS with respect to clarifications and information detailed within this review.
Ref.	Summary of Potential Regulation 25 Requests from Applicant
GC5	No combined effects have been considered for Ground Conditions and Contamination in Chapter 15 or elsewhere is the ES.
Ref.	Potential Planning Conditions
GC6	Pre-commencement: The Applicant shall submit to the LBS for approval the following documents: 1) A site investigation report detailing the design, implementation and undertaking of an intrusive ground investigation and subsequent assessment of ground conditions and land quality in accordance with best practice in contaminated land assessment (BS10175/ CIRIA 552 etc.). 2) A detailed DCEMP that identifies the potential risks to human health and the wider environment posed by the proposed construction works, and the series of measures to be implemented by the developer to suitably mitigate these risks. An Asbestos refurbishment / demolition survey in line with CAR 2012.
GC7	Pre-commencement: The Applicant shall submit to the LBS for approval the following documents: A remediation/ risk management strategy detailing how the risks identified following completion of the Site investigation report are to be addressed during the redevelopment of the Site. This report should include a verification plan detailing how the proposed works will be monitored and validated.
GC9	Pre-commencement: The Applicant shall submit to LBS a Detailed UXO Risk Assessment together with details of mitigation measures to be employed as part of the proposed development in relation to UXO.

Chapter 14

Review of Chapter 14: Climate Change and Greenhouse Gases

Scope of EIA

14.1 Chapter 14 of the ES assesses the likely significant effects of the Proposed Development on greenhouse gases (GHGs) and climate change.

14.2 The EIA Regulations require a climate change assessment that provides a description of the likely significant effects of the Proposed Development on the environment, resulting from both the impact of the Proposed Development on the climate (e.g. the nature and magnitude of GHG emissions) and the vulnerability of the project to climate change. The scope of the GHG and Climate Change Resilience (CCR) assessments presented in Chapter 14 are considered acceptable. The system boundaries used in the Whole Life Carbon (WLC) assessment are considered to be appropriate.

Baseline

14.3 Paragraphs 14.8 to 14.13 present the historic and existing climate conditions, as well as the projected future climate conditions for the UK, as well as the projected future climate conditions for London, at the sub-regional scale. Clarification is sought as to whether the regional or sub-regional scale existing conditions have been considered as part of the assessment (**CC1**).

14.4 The baseline for the GHG emissions assessment is considered to be zero, thereby providing a conservative estimate, as the embedded carbon emissions associated with construction already reflect the net change and information was not available at the time the assessment was undertaken.

Assessment

14.5 The assessment of CCR and Adaptation considers the impact of climate change on the sensitive receptors of other topics in the ES (In-combination climate change impacts), as well as the impact of climate change on the Proposed Development itself. The assessment of CCR and Adaptation is considered appropriate.

14.6 The identified receptor for the assessment of GHG emissions is considered appropriate.

14.7 The GHG assessment takes a whole-life approach to develop a GHG footprint for the Proposed Development.

14.8 The assessment of GHGs references the WLC Assessment. The key assumptions from the WLC assessment should be included in the methodology section of the chapter (**CC2**).

Secondary, Cumulative and Combined Impacts

14.9 No additional or different likely significant cumulative effects as a result of the Proposed Development have been identified as part of the assessment of GHGs and climate change.

Mitigation and Management

14.10 The embedded mitigation considers measures relating to the demolition and construction, as well as the operation of

Table 14.1: Summary of Climate Change and Greenhouse Gases Review

Ref.	Summary of Clarifications Required from Applicant
CC1	Clarification is sought as to whether the regional or sub-regional scale existing conditions have been considered as part of the climate change adaptation and resilience assessment.
CC2	Key assumptions from the WLC assessment should be included in the methodology section of the chapter
CC3	The NTS may need updating with respect to the additional clarifications as detailed within this review.
Ref.	Summary of Potential Regulation 25 Requests from Applicant
N/A	N/A.
Ref.	Potential Planning Conditions
N/A	N/A.

the Proposed Development. The identified mitigation measures are considered appropriate.

Non-Technical Summary

14.11 The NTS provides an acceptable summary of the corresponding ES chapter. However, it may need updating with respect to the additional clarifications as detailed within this review (**CC3**).

Chapter 15
Review of Chapter 15: Effect Interactions

Scope of EIA

15.1 Chapter 15 of the ES considers the effect interactions that have been assessed during the demolition, construction and operation of the Proposed Development, considering intra-project cumulative effects. The assessment considers residual minor, moderate and major effects within the chapter. This is considered appropriate.

Baseline

15.2 The baseline for each of the topics have been assessed in the relevant technical chapters.

Assessment

15.3 Although there is no established EIA methodology for assessing effect interactions, there is guidance from the European Commission (EC) to assist practitioners in developing an approach relevant to the scale and nature of each project. This guidance has been used and is considered appropriate.

15.4 To identify potential effect interactions, residual effects have been tabulated against receptors or groups of receptors. Where a technical assessment does not follow the standard EIA methodology, a qualitative approach has been taken using professional judgement. This is considered an appropriate methodology.

Secondary, Cumulative and Combined Impacts

15.5 Tables 15-1 and 15-2 outline the potential combined effects of individual impacts for the Proposed Development during the demolition, construction and operational phases. Residual effects are clearly identified in both tables. This is considered appropriate.

Mitigation and Management

15.6 There is no discussion on mitigation and management in Chapter 15, this is contained in Chapter 17 of the ES 'Environmental Management, Mitigation and Monitoring Schedule'.

Non-Technical Summary

15.7 The NTS is clear and concise. It considers cumulative effects and effect interactions on Page 19 and 20 of the NTS.

Table 15.1: Summary of Effect Interactions Review

Ref.	Summary of Clarifications Required from Applicant
N/A	N/A
Ref.	Summary of Potential Regulation 25 Requests from Applicant
N/A	N/A
Ref.	Potential Planning Conditions
N/A	N/A

Chapter 16
Review of Chapter 16: Likely Significant Effects

Scope of EIA

16.1 Residual (likely significant) effects are listed throughout the technical chapters of the ES (Chapter 6-14 & Vol 2), and details are provided on the scale of effect, the geographic scale and the nature of the effect.

16.2 Tables 16.1 and 16.2 of the chapter clearly outline a summary of residual effects of the Proposed Development through the demolition and construction, and operational phases (completed development), respectively.

Assessment

16.3 Each of the technical chapters contains detailed considerations of the beneficial and adverse residual effects likely to arise from the Proposed Development. The criteria to assess the residual effects are defined clearly in Chapter 2: EIA Methodology.

16.4 Significant residual effects are highlighted in orange and green for adverse and beneficial effects respectively, while blue is used for neutral effects.

Non-Technical Summary

16.5 The NTS provides sufficient information in a non-technical language regarding residual effects and conclusions.

Table 16.1: Likely Significant Effects Review

Ref.	Summary of Clarifications Required from Applicant
N/A	N/A.
Ref.	Summary of Potential Regulation 25 Requests from Applicant
N/A	N/A.
Ref.	Potential Planning Conditions
N/A	N/A.

Chapter 17
Review of Chapter 17:
Environmental Management,
Mitigation and Monitoring
Schedule

Scope of EIA

17.1 Chapter 17 of the ES has been prepared to detail the mitigation requirements throughout the demolition, construction and operational phases of the Proposed Development.

Assessment

17.2 Reference is made to three types of mitigation that have been considered in the assessment: embedded, secondary and tertiary mitigation. Primary and tertiary mitigation measures were identified in the Embedded Mitigation section of the technical chapters, with secondary mitigation outlined under the Mitigation, Monitoring and Residual Effects section of the technical chapters.

17.3 Table 17.1 clearly identifies the management plans or management documents that will need to be secured via planning condition. It is a clear table setting out requirements.

17.4 Table 17.2 presents other / secondary mitigation measures that are required for the Proposed Development and have been identified during the EIA process. The table also provides a reference for readers to identify which technical chapter recommends each element of mitigation.

Non-Technical Summary

17.5 The NTS provides sufficient information in a non-technical language regarding mitigation.

Table 17.1: Summary of Environmental Management,
Mitigation and Monitoring Schedule Review

Ref.	Summary of Clarifications Required from Applicant
N/A	N/A.
Ref.	Summary of Potential Regulation 25 Requests from Applicant
N/A	N/A.
Ref.	Potential Planning Conditions
N/A	N/A.

Chapter 18

Review of Volume 2: Heritage, Townscape, and Visual Impact Assessment (HTVIA)

Introduction

18.1 Volume 2 of the ES provides a Heritage, Townscape and Visual Impact Assessment (HTVIA). The heritage assessment is dealt with separately (within Chapter 7 of the HTVIA) from the townscape and visual assessments (Chapters 8 and 9). Distinct methodologies are used, as set out in Chapter 2 of the HTVIA. This distinction is welcomed.

18.2 Correspondingly, this review separates matters relating to heritage (above ground heritage assets) and townscape and visual topics into two sub-sections within this chapter. It will discuss the heritage effects and townscape and visual effects in isolation.

Heritage

Scope of EIA

18.3 The Scoping Opinion (SO) requested that the ES clearly assesses the Proposed Development's heritage effects and townscape and visual effects in separate chapters/ sections. This has been done, and is welcomed.

Baseline

18.4 Paragraphs 2.23 and 2.24 describe that the study area has been defined with reference to a ZTV, combined with consideration of visual and non-visual interactions of the Proposed Development with assets' significance. This approach appears appropriate but is not illustrated in the accompanying figures. Amended figure(s) should be provided to clearly illustrate the ZTV extent and the assets scoped into assessment (**BH01**).

18.5 The range of built heritage found in the study area is defined and the separation of coverage from the Archaeology chapter explained. All grades of designated assets are included, Historic Environment Record (HER) data has been consulted, and previously unidentified assets have been checked for, as requested in the Scoping Review Report (SRR) supporting the SO.

Assessment

18.6 As requested in the SRR, the heritage assets intersecting with the Site boundary are included for assessment of physical effects, which is welcomed. For future reference it should be

noted, however, that effects arising through both physical change and change to setting are 'direct' effects, because they both directly affect heritage significance (contrary to the statement regarding 'indirect effects' at paragraph 2.17). However, the application of this term does not change the assessment or conclusions and requires no further action in this instance.

18.7 Table 2.1 equates 'heritage significance' and 'sensitivity to change'. It appears that 'heritage significance' is used to indicate importance – i.e. level of designation – rather than the sum of heritage values and it would therefore be helpful to make a clear distinction between the two. The approach in IEMA, IHBC, ClfA 2021 Principles of Cultural Heritage Impact Assessment is particularly recommended as being clear, simple and logical. However, checking the application of the method within the assessment, the two quantities are clearly differentiated, and as such the use of the terminology in Table 2.1 does not appear to have given rise to any erroneous conclusions in this instance.

Secondary, Cumulative and Combined Impacts

18.8 The approach to cumulative assessment described at paragraph 2.50 appears appropriate.

Mitigation and Management

18.9 The approach to avoidance or reduction of harmful effects through design development, and mitigation of residual effects at paragraphs 2.4-2.6 appears appropriate.

Non-Technical Summary

18.10 Although carried out and presented as separate assessments in the ES chapter, the conclusions on significant effects (or the absence of them) for built heritage, and townscape and visual, are summarised together in the NTS. This is misleading, because the effects, although bundled together, actually apply to different receptor types. This could lead to confusion by readers expecting to find beneficial effects ascribed to heritage, for example, when they only apply to townscape and visual. The conclusions on heritage, and townscape and visual, should be summarised separately for clarity (**BH02**).

Townscape and Visual

Scope of EIA

18.11 A Scoping Report for the Proposed Development was issued by Trium Environmental Consulting LLP on behalf of the Applicant on the 11th of January 2024. LUC reviewed this and made 17 requests with reference to the townscape and visual topic within the Scoping Opinion issued by LBA on the 27th of March 2024. Responses to these have been provided

in Appendix 5 of the HTVIA which is helpful. Most of the requests have been addressed; where this is not the case it is highlighted in the review below.

Baseline

18.12 An account of the Pre-Application consultation is set out within Chapter 7 of the Planning Statement, with a brief summary of how this influenced the Proposed Development. Further detail is also included in the Design and Access Statement (DAS). However, there is no summary of requests and responses relating specifically to townscape and visual matters which would be helpful.

18.13 A Theoretical Zone of Visibility (ZTV) has been appended to Volume 2, as Appendix 3. Assessment viewpoint locations have been overlaid onto this within Figure 9.1 which is helpful and aligns with Scoping Opinion response TVIA4.

18.14 Paragraph 2.53 states that the study area for townscape effects is “*between approximately 500m and 750m radius from the site*” and Paragraph 2.55 states that the study area for visual effects is “*limited to locations from which the Site can be seen, or from which the Proposed Development on it will be seen at the height proposed*” and that the maximum study area extends to 2.6km. Based on the ZTV this seems appropriate.

18.15 The classification of the townscape is set out in Figure 8.1 and appears to be at a suitable scale. It is stated in Paragraph 8.2 that Townscape Character Areas (TCAs) were defined using existing published studies (Peckham and Nunhead Characterisation Study, March 2012; Camberwell Area Character Study, August 2023; and Peckham Area Character Study, December 2023) which is appropriate and aligns with Scoping Opinion response TVIA3.

18.16 The assessment viewpoints provide a good geographical spread from various directions and distances and we understand that these have been agreed with LBS. However, the following is noted (although not likely to change the overall assessment findings):

- View 26 is located at the junction of Friary Road/Fenham Street from where the Proposed Development is largely occluded from view. Greater levels of visibility are likely to be available from further west at the junction of Marmot Road/Fenham Street as suggested by the ZTV.
- There are no viewpoints located on Cicely Road where clear views towards the eastern parts of site are available; whilst views may be similar to those along Cerise Road (View 36) different parts of the Proposed Development would be visible.

- There is no viewpoint within the public open space at Warwick Gardens to the south-west of the site despite the ZTV indicating some levels of visibility.

18.17 A baseline description of each view is provided beside each viewpoint photograph in Chapter 9, which is appropriate.

18.18 For each view, Accurate Visual Representation (AVR) images (produced by Millerhare) are presented and include: an 'existing' view photograph, showing baseline conditions; a 'proposed' view, showing the Proposed Development placed accurately into the baseline photograph; and a 'proposed with cumulative schemes' view, showing the Proposed Development and cumulative schemes placed accurately together into the baseline photography.

18.19 Scoping Opinion response TVIA12 requested that the visualisations be presented in accordance with Landscape Institute guidance on the representation of development proposals (<https://www.landscapeinstitute.org/visualisation/8>), and advised that the Applicant discussed appropriate image size and presentation with LBS, providing justification for the approach proposed.

18.20 The main point from the LI guidance that is missing is reference to the scale of image presentation (known as 'image enlargement' in the LI guidance) which is recommended to be at least 100%. The images in the TVIA are almost certainly less than this. Whether this is an issue comes down to how LBS are using the visualisations. Visualisations should ideally be used in the field so that the real scale of the change can be observed and appreciated. The scale of presentation of the images is more crucial if they are being viewed in the office or on a computer and not in the field. LBS should therefore satisfy themselves that they understand the real scale of the Proposed Development as shown in the visualisations, seeking confirmation of the 'enlargement factor' and requesting larger images of at least 100% enlargement if required to inform the decision.

Assessment

18.21 The method used is stated as being based on the principles set out in GLVIA3 which is appropriate guidance.

18.22 Paragraph 2.66 states that the effects on townscape and visual receptors are assessed by combining judgements about the 'sensitivity of the receptor' and the 'magnitude of change' it would experience as a result of the Proposed Development. This is appropriate and in line with GLVIA3.

18.23 Paragraph 2.68 states that the sensitivity of the townscape or visual receptor is dependent on the importance, value and quality of the townscape or view; and the susceptibility to change of the receptor, and that for visual receptors this includes the nature and expectation of the viewer reflecting their occupation or activity. This is

appropriate and in line with GLVIA3. However, whilst *"examples are provided by way of general guidance"* in Paragraphs 2.75 and 2.76, detailed criteria are not presented for assessing susceptibility, value, sensitivity or magnitude of change in line with Scoping Opinion TVIA9 and these should be provided (**TVIA1**).

18.24 A Matrix is provided in Table 2.4 to indicate how sensitivity and magnitude of change combine to determine overall effects, which is useful and in line with Scoping Opinion response TVIA10. Table 2.4 and Paragraph 2.81 indicate that effects of Moderate and above are considered 'significant' in the context of an EIA. This seems appropriate. It should be noted that matrices are useful as a guide rather than being prescriptive assessment tools.

18.25 Assessments are provided for the demolition and construction phase (Chapter 10) and the operational phase (townscape assessment in Chapter 8 and visual assessment in chapter 9).

18.26 In regard to townscape and visual effects during the demolition and construction phase, these are set out separately within Chapter 10 with a summary included within Tables 11.2 and 11.3 of Chapter 11. However, it is not clear what the magnitude of change is for individual receptors, which should be provided in line with Scoping Opinion response TVIA8 (**TVIA2**).

18.27 In regard to the operational assessment it is not clear at what year this has been undertaken (e.g. Year 1, immediately after construction; or Year 15, once the landscape proposals have had time to establish). It is also not clear at what year of operation the AVR images show, particularly relevant for those near-distance views where the proposed landscape interventions are visible. This should be clarified (**TVIA3**).

Townscape

18.28 Reference is made in Chapter 5 to the scattered trees within the site and on the site boundary as landscape/ townscape elements. It is noted that Paragraph 6.52 refers to *"some trees being retained"* but it is not clear which. However, no subsequent assessment is made considering their loss/ retention in line with Scoping Opinion response TVIA2 and this should be provided (**TVIA4**).

18.29 The HTVIA does not refer to an Arboricultural Impact Assessment or Tree Survey. If this has been produced and submitted with the planning application, it should be referred to in order to assist with an assessment of effect on trees (**TVIA5**).

18.30 The HTVIA describes the characteristics of each TCA and concludes on the overall sensitivity to change. However, it is not clear what the individual ratings are for value and

susceptibility, and this should be clarified with reference to the methodology (**TVIA6**).

18.31 Townscape assessment does not provide a narrative to justify the magnitude of change ratings with reference to the methodology. This should be provided with reference to the methodology (**TVIA7**). GLVIA3 advocates for clear narrative text so that the reasoning behind judgments is clear.

18.32 The townscape assessment findings seem appropriate. The following significant effects are identified:

- Demolition and construction effects - TCA A - central Peckham, retail, civic and leisure (Moderate to Major adverse).
- Operational effects - TCA A - central Peckham, retail, civic and leisure (Moderate to Major beneficial).

Visual

18.33 The HTVIA describes the characteristics of the view from each viewpoint and describes the various aspects relating to value and susceptibility which is appropriate.

18.34 However, it is not clear how the sensitivities of local communities/residents have been treated for several views, with a low sensitivity assigned to some views (e.g. View 14, 15, 18, 20, 22, 23, 25, 29, 34 and 36) and this should be clarified (**TVIA8**). GLVIA3 indicates that receptors most susceptible to change includes local communities and residents.

18.35 The visual assessment findings seem appropriate (notwithstanding the comments below). The following significant effects are identified:

- Demolition and construction effects - 19 views (View 1, 4, 5, 6, 8, 9, 10, 11, 12a, 12b, 16, 17, 19, 29, 30, 31, 32, 33 and 35), ranging from Moderate to Major adverse to Moderate adverse.
- Operational effects - 17 views (View 4, 5, 6, 8, 9, 10, 11, 12a, 12b, 17, 19, 29, 30, 31, 32, 33 and 35), ranging from Moderate to Major beneficial and Moderate to Major neutral to Moderate beneficial and Moderate neutral.

18.36 In regard to the assessment on direction of effect (i.e. beneficial, adverse or neutral), all visual effects are identified as either beneficial or neutral. We would question whether some of these could be perceived as adverse in cases where the Proposed Development would impact views towards a local landmark or where it would result in the loss of positive features/characteristic of a view (e.g. View 9, 30, 31, 32, 33, 36 and 37).

Secondary, Cumulative and Combined Impacts

18.37 The HTVIA includes a cumulative assessment. As stated in Paragraph 2.87, this assesses *"the 'additional' effects of the Proposed Development on each townscape or visual receptor over and above the future baseline scenario, rather than the effect of all committed schemes and the Proposed Development together in 'combination'"*. This is appropriate, however, it is not clear whether the cumulative schemes considered were agreed with LBS in line with Scoping Opinion TVIA14.

18.38 In regard to the cumulative assessment, the HTVIA has considered both consented and submitted applications which is acceptable. The AVRs distinguish between schemes with consent (orange wireline) and those without (yellow wireline) which is helpful and in line with Scoping Opinion request TVIA15.

18.39 Although the cumulative schemes considered differs from the approach suggested in Scoping Opinion response TVIA13, as the consented schemes and submitted schemes are differentiated in the AVRs LBS should be able to understand difference. The information should be sufficient from LBS to understand the cumulative effects likely to arise.

Mitigation and Management

18.40 Demolition and construction: the TVIA refers to the mitigation of potential construction effects including the use of appropriate hoarding and site lighting being designed to minimise light pollution. Reference is also made to a DCEMP.

18.41 Operation: the HTVIA describes the primary mitigation measures (i.e. measures integrated/embedded within the scheme) in section 6. More information is provided in the DAS. This is appropriate and in line with Scoping Opinion 16

18.42 It should be noted that this review does not comment of design quality or urban design principles.

Non-Technical Summary

18.43 The NTS agrees with the findings set out in the main ES chapter with reference to townscape and visual effects. It provides sufficient information for the non-specialist reader to understand the main environmental impacts of the proposal without reference to the main ES. However, if any changes are made to the assessment as a result of the comments in this review the NTS should also be updated accordingly.

Chapter 19
Summary of Submitted
Regulation 25/Clarification
Information

Table 18.1 : Summary of Heritage, Townscape and Visual
Impact (HTVIA) Review

Ref.	Summary of Clarifications Required from Applicant
TVIA01	Paragraphs 2.75 and 2.76, detailed criteria are not presented for assessing susceptibility, value, sensitivity or magnitude of change in line with Scoping Opinion TVIA9 and these should be provided
TVIA03	It is not clear at what year of operation the AVR images show, particularly relevant for those near-distance views where the proposed landscape interventions are visible. This should be clarified.
TVIA05	The TVIA describes the characteristics of each TCA and concludes on the overall sensitivity to change. However, it is not clear what the individual ratings are for value and susceptibility, and this should be clarified with reference to the methodology.
TVIA07	However, it is not clear how the sensitivities of local communities/residents have been treated for several views, with a low sensitivity assigned to some views (e.g. View 14, 15, 18, 20, 22, 23, 25, 29, 34 and 36) and this should be clarified.
Ref.	Summary of Potential Regulation 25 Requests from Applicant
BH01	Amended figure(s) should be provided to clearly illustrate the ZTV extent and the assets scoped into assessment.
BH02	The conclusions on heritage, and townscape and visual, should be summarised separately for clarity in the NTS.
TVIA02	It is not clear what the magnitude of change is for individual receptors, which should be provided in line with Scoping Opinion response TVIA8.
TVIA04	No assessment is made considering the loss/ retention of trees within the site in line with Scoping Opinion response TVIA2 and this should be provided. The TVIA does not refer to an Arboriculture Impact Assessment or Tree Survey. If this has been produced and submitted with the planning application, it should be referred to in order to assist with an assessment of effect on trees.
TVIA06	Townscape assessment does not provide a narrative to justify the magnitude of change ratings with reference to the methodology. This should be provided with reference to the methodology.
Ref.	Potential Planning Conditions
N/A	N/A

19.1 Table 19.1 below provides a summary of the clarifications, potential Regulation 25 requests and suggested planning conditions as identified in the Draft Review Report.

19.2 Following receipt of the Applicant responses to the clarifications, potential Regulation 25 requests and suggested planning conditions raised, the table will be updated to include responses and further judgements as to the acceptability of the information provided in relation to the ES.

Table 19.1 Assessment of Submitted Regulation 25/Clarification Information

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
Demolition and Construction				
DC1	Clarification	Clarification as to whether an Outline DCEMP will be made available to review		
DC2	Planning Condition	Submission of an Outline DCEMP pre-commencement along with a full DCEMP.		
DC3	Clarification	Clarification as to whether phased receptors have been considered within the ES chapters		
DC4	Clarification	Clarification as to whether a Construction Logistics Plan will be made available to review		
DC5	Planning Condition	Submission of a Construction Logistics Plan.		
DC6	Clarification	Clarification whether WRAP's Net Waste Tool was employed to calculate predicted waste volumes		
DC7	Regulation 25	As Waste is scoped out of the ES the Project Waste Management Plan should be included within the ES appendices		
DC8	Clarification	Clarification of DMP parameters and agreed actions should the parameters be breached		
Socio-economics				
SE1	Clarification	It should be made clear that without mitigation cumulative impacts on healthcare will be adverse and significant.		

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
Traffic and Transport				
TT1	Planning Condition	LUC is satisfied with the proposed mitigation which includes a suite of Plans that will be secured via planning condition.		
Air Quality				
AQ1	Clarification	Clarification as to whether emissions from ventilation exhaust from the proposed basement vehicle parking have been included in the assessment modelling.		
AQ2	Regulation 25	Inclusion of judgement on how representative the 2022 monitoring data are of a post-pandemic baseline.		
AQ3	Planning condition	Planning condition relating to the need to consider potential odour mitigation from commercial kitchens should they be included within the supermarket, drinking establishment, and/or elsewhere within the site.		
AQ4	Planning condition	Planning condition relating to the maximum number of hours testing that each emergency diesel generator is permitted.		
Noise and Vibration				
NV1	Planning condition	It is recommended that a planning condition requiring a Construction Environment Management Plan and Construction Logistics Plan which includes detailed calculations and mitigation measures should be included to minimise noise impacts.		

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
NV2	Planning condition	A planning condition to control noise from mechanical plant to be assessed in accordance with the approach set out in BS4142:2014 should be included. An updated survey is recommended to establish background sound levels once the development is constructed.		
NV3	Planning condition	It is recommended that a planning condition is included to control noise from the proposed entertainment uses, with reference to NANR92 – Noise from Pubs and Clubs.		
NV4	Planning condition	A planning condition is recommended that is in accordance with the noise levels detailed in Table 4 <i>Internal ambient noise levels for dwellings</i> set out in BS 8233. Individual noise events should not exceed internal levels of 45dB L _{Amax,F} more than 10 times a night. This should include an updated survey include octave band data, to inform mitigation measures, including potential noise impacts during overheating conditions.		
Daylight, Sunlight and Overshadowing				
DSO1	Clarification	Confirmation of determination of sensitive receptors, including any non-residential uses		
DSO2	Clarification	How room uses quoted as providing mitigation (i.e. bedrooms) were established.		
DSO3	Clarification	How short term tenure quoted as providing mitigation was established at 81 Hanover Park.		
DSO4	Clarification	Confirmation of no SHOG sensitive receptor to the rear of 85 Peckham High St.		

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
DSO5	Potential Regulation 25	Disagreement with categorisation of effects as these relate to moderate/ major effects, which means significant effects may have been under-reported in the ES.		
Wind Microclimate				
WM1	Clarification	Given the location of the Site, the list of references in Paragraph 23 in Document 6 should include the City of London Wind Microclimate Guidelines.		
WM2	Clarification	There looks to have been a typographic error when referring to the number of years of processed wind data – please clarify.		
WM3	Clarification	Paragraph 11.35 of Document 1 mentions that 148 probe point locations are chosen, yet there are results for 150 different points. This is another potential typographic error – please clarify.		
WM4	Clarification	For consistency with presentation of results in Figure 5, include the Scenario number in the caption for Figures 5a-e in addition to using the full textual description of what the scenario corresponds to.		
WM5	Clarification	The demarcation using the colours is a neat way to present the results but cannot be visualised by someone who is colour blind. Is it possible to categorise the different probe points and the associated Comfort and Safety Levels using different marker styles?		
WM6	Clarification	Why is there no presentation of a similar table for Scenario 3 for proposed mitigations, as has been done for Scenarios 2 and 4?		

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
WM7	Clarification	Note that there is a referencing error in Paragraph 11.125 of Document 1, and the correct reference should be provided.		
WM8	Potential Regulation 25	The implementation of balustrades and/or soft landscaping for each Scenario could require a Potential Regulation 25 Request		
Archaeology				
ARCH01	Clarification	Explanation should be provided that the assessment follows an appropriate, agreed source such as IEMA, IHBC, ClfA's 2021 Principles of Cultural Heritage Impact Assessment in the UK and/ or GLA 2023 Planning Practice Note: Heritage Impact Assessments and the Setting of Heritage Assets.		
ARCH02	Clarification	Confirmation of the full list of sources applied should be provided.		
ARCH03	Potential Regulation 25	Further information on the ascription of heritage value should be provided to make conclusions clear – i.e. to explain the link between the assessment of heritage significance and the significance of effect. Application of the differentiation between 'significance' and 'importance', as per IEMA, IHBC, ClfA's 2021 Principles of Cultural Heritage Impact Assessment in the UK, is recommended to help achieve clarity.		
ARCH04	Clarification	Confirmation should be provided that the approach to cumulative assessment has been agreed with the LBS archaeology advisor.		
ARCH05	Potential Regulation 25	Conclusions on residual effects to archaeology should be amended to remove inappropriate		

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
		reduction of level of harm ascribed to off-setting measures.		
ARCH06	Potential Regulation 25	As a result of the further information requested at ARCH05, changes may be required to the NTS. These should be incorporated into an amended NTS, if found to be required.		
ARCH07	Planning Condition	To be confirmed under advice from LBS' archaeology adviser.		
Ground Conditions and Land Contamination				
GC1	Clarification	Further explanation as to the justification of this selected study area extent is		
GC2	Clarification	Clarification whether consultation with a petroleum licencing officer is to be undertaken		
GC3	Clarification	Clarification whether the groundwater receptor includes consideration of the Thanet Sands Secondary A aquifer and underlying Chalk Principal aquifer		
GC4	Clarification	Revision of UXO potential effects classifications, as a result for demolition and construction works		
GC5	Regulation 25	No combined effects have been considered for Ground Conditions and Contamination in Chapter 15 or elsewhere is the ES report		
GC6	Planning Condition	Pre-commencement: The Applicant shall submit to the LBS approval the following documents; ■ A site investigation report detailing the design, implementation and undertaking of an intrusive ground investigation and subsequent		

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
		assessment of ground conditions and land quality in accordance with best practice in contaminated land assessment (BS10175/ CIRIA 552 etc.). ■ A detailed DCEMP that identifies the potential risks to human health and the wider environment posed by the proposed construction works, and the series of measures to be implemented by the developer to suitably mitigate these risks. An Asbestos refurbishment / demolition survey in line with CAR 2012.		
GC7	Planning Condition	Pre-commencement: The Applicant shall submit to the LBS approval the following documents; A remediation/ risk management strategy detailing how the risks identified following completion of the Site investigation report are to be addressed during the redevelopment of the Site. This report should include a verification plan detailing how the proposed works will be monitored and validated.		
GC8	Clarification	Inclusion of mitigation measures for receptors such as surface water, construction works and nearby residents in Paragraph 13.140.		
GC9	Planning Condition	Pre-commencement: The Applicant shall submit to LBS a Detailed UXO Risk Assessment together with details of mitigation measures to be employed as part of the proposed development in relation to UXO.		

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
GC10	Clarification	Update to the NTS with respect to clarifications and information detailed within this review.		
Climate Change and Greenhouse Gases				
CC1	Clarification	Clarification is sought as to whether the regional or sub-regional scale existing conditions have been considered as part of the climate change adaptation and resilience assessment.		
CC2	Clarification	Key assumptions from the WLC assessment should be included in the methodology section of the chapter		
CC3	Clarification	The NTS may need updating with respect to the additional clarifications as detailed within this review.		
Heritage, Townscape and Visual Assessment (HTVIA)				
BH01	Potential Regulation 25	Amended figure(s) should be provided to clearly illustrate the ZTV extent and the assets scoped into assessment.		
BH02	Potential Regulation 25	The conclusions on heritage, and townscape and visual, should be summarised separately for clarity in the NTS.		
TVIA01	Clarification	Paragraphs 2.75 and 2.76, detailed criteria are not presented for assessing susceptibility, value, sensitivity or magnitude of change in line with Scoping Opinion TVIA9 and these should be provided.		
TVIA02	Potential Regulation 25	It is not clear what the magnitude of change is for individual receptors, which should be provided in line with Scoping Opinion response TVIA8.		

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
TVIA03	Clarification	It is not clear at what year of operation the AVR images show, particularly relevant for those near-distance views where the proposed landscape interventions are visible. This should be clarified.		
TVIA04	Potential Regulation 25	No assessment is made considering the loss/ retention of trees within the site in line with Scoping Opinion response TVIA2 and this should be provided. The TVIA does not refer to an Arboriculture Impact Assessment or Tree Survey. If this has been produced and submitted with the planning application, it should be referred to in order to assist with an assessment of effect on trees.		
TVIA05	Clarification	The TVIA describes the characteristics of each TCA and concludes on the overall sensitivity to change. However, it is not clear what the individual ratings are for value and susceptibility, and this should be clarified with reference to the methodology.		
TVIA06	Potential Regulation 25	Townscape assessment does not provide a narrative to justify the magnitude of change ratings with reference to the methodology. This should be provided with reference to the methodology.		
TVIA07	Clarification	However, it is not clear how the sensitivities of local communities/residents have been treated for several views, with a low sensitivity assigned to some views (e.g. View 14, 15, 18, 20, 22, 23, 25, 29, 34 and 36) and this should be clarified.		

Appendix A

Evidence of Reviewer Competency

A.1 Details of the expertise of each of the team members involved in the review are set out in the table below.

Table A.1 Reviewer Competency

Reviewer	Topic/Responsibility	Professional Qualifications	Years of Experience
Helen Kent	Project Director	BA (Hons) Geography MSc Land Resource Management PGDip Town & Regional Planning MRTPI, MIEMA, Chartered Environmentalist	20+
Louis Bishop	Project Manager	MSc, BSc, PIEMA REnvP	5
Ife Asiyambi	Project coordinator, introductory chapters, socio-economics.	BSc, Geology and Mineral Sciences MSc, Environmental Assessment and Management GradIEMA	2+
Rachel Howarth	Archaeology and Built Heritage	MA (PG) MA (Hons) IHBC	20+
David Hope	Townscape and Visual Impact Assessment	BSc Archaeology, MA, Landscape Architecture CMLi, PCIfA	10
Anneliese Whiteley	Demolition and Construction Ground Conditions and Land Contamination	BSc MSc FGS	5
James Mortimer	Demolition and Construction Ground Conditions and Land Contamination	BSc FGS	20
Dr Josh Walton	Wind Microclimate	PhD Mathematics & Statistics, BSc Mathematics & Physics	3

Reviewer	Topic/Responsibility	Professional Qualifications	Years of Experience
Gregory Francis	Daylight, Sunlight and Overshadowing	MBA, PG Dip, BA (Hons)	20
Ashley Shepherd, Principal Acoustic Consultant	Acoustics	BSc (Hons) Music Technology, Acoustics and Psychoacoustics, MIOA	10
Mark Chapman, Technical Director	Air Quality	CEnv MIAQM MEnvSc Msc Bsc	23
Tobenna Uzuegbunam, LUC	Climate Change	PhD, MSc, B.Eng.	2+

Appendix: Introduction, ES Addendum Approach and Proposed Amendments

Annex 1: Location of Information within the ES and December 2024 Addendum

Annex 2: Trium Statement of Competence

Annex 3: LUC Environmental Statement Review

Annex 4: Revised Cumulative Schemes

Aylesham Centre: Cumulative Scheme List

The EIA Regulations require that, in assessing the effects of a particular development proposal, consideration should also be given to the likely significant effects arising from the “cumulation with other existing and/or approved projects” (Schedule 4, 5(e)) (i.e., Cumulative Schemes).

To ensure that cumulative impacts and effects are assessed as comprehensively and realistically as possible, the EIA would only consider other ‘Cumulative Schemes’. The Cumulative Schemes that will be considered within the ES will typically be located within a 1-kilometer (km) radius from the centre of the site.

The Cumulative Schemes identified will be guided by the following criteria:

- Full planning consent or resolution to grant consent;
- Produce an uplift of more than 10,000 square meters (Gross External Area (GEA)) of mixed-use floorspace, or over 150 residential units.

In addition, any office to residential conversions (granted under the General Permitted Development Order) giving rise to >150 residential units will be considered.

Note that the above criteria form a guide in the absence of any formal EIA cumulative scheme guidance. Additional factors taken into account to help determine which schemes are included (or excluded) include (amongst others) distance of the scheme from the site, and nature and scale of the development for the scheme. Where relevant, the assessment within the respective chapter may only identify a selection of Cumulative Schemes for the assessment (i.e., because of distance to the site), or alternatively identify additional schemes for inclusion (i.e., within the 1km radius) – with a clear reason and rationale for doing so.

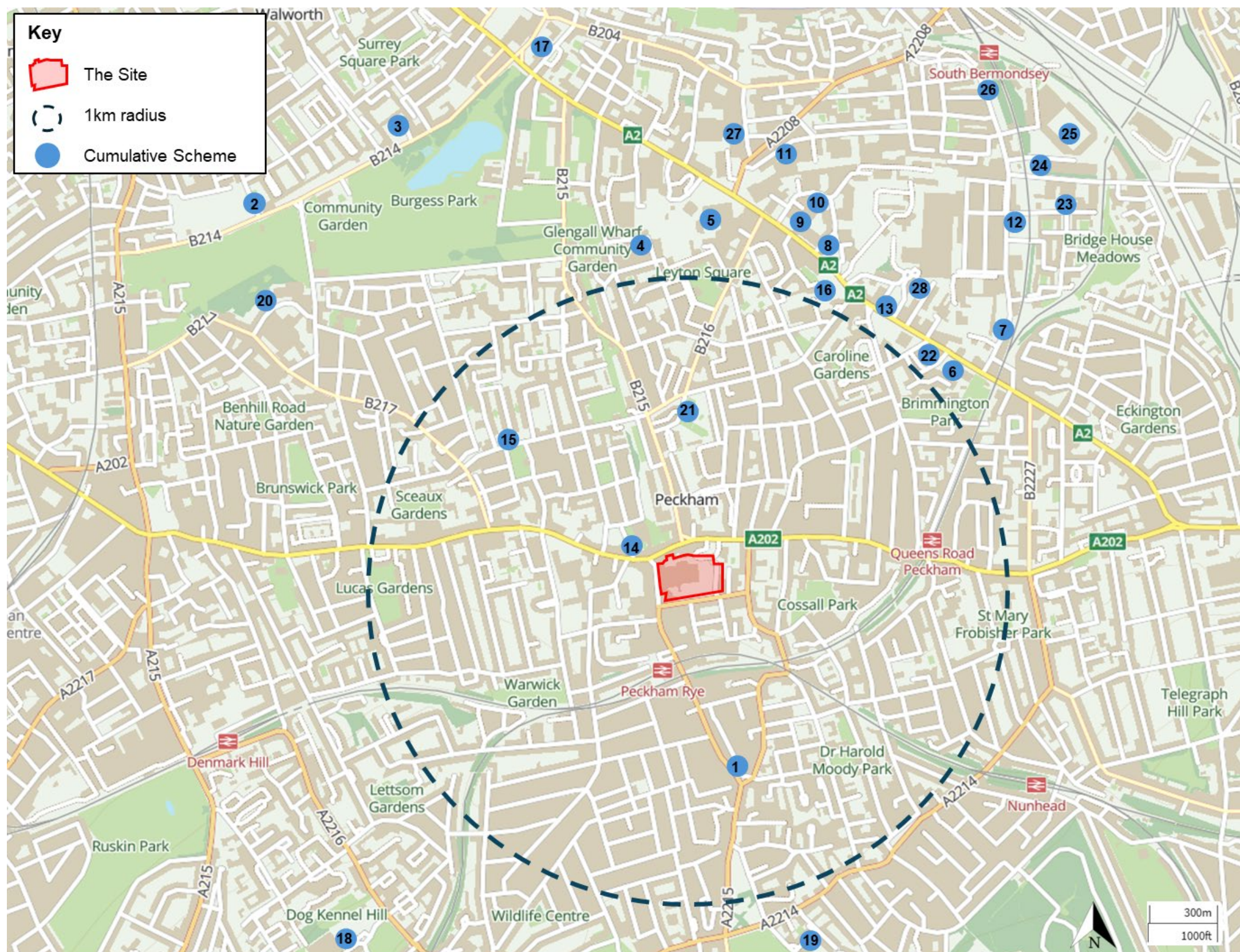
For the Proposed Development, the following preliminary list of Cumulative Schemes have been identified for consideration:

Table 1 Cumulative Schemes

ID	Site Name	Description	App Ref	Status
Schemes that are Approved and which form part of the Cumulative Assessment				
1	213 Rye Lane London SE15 4TP	Partial demolition of existing buildings and redevelopment to provide buildings ranging from 1 to 7 storeys in height accommodating ground floor commercial space (Class A1/B8) with 40 residential units above (Class C3), raised amenity courtyard together with associated blue badge car parking and cycle parking.	16/AP/0131	Significantly Progressed Approved 28 Mar 2017
2	Aylesbury Estate Phase 1 Land Bounded By Albany Road Portland Street Bagshot Street Alvey Street East Street And Dawes Street London SE17	Outline application for: demolition of existing buildings and phased redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 to 20 storeys in height (12.45m - 68.85m AOD) with capacity for up to 2,745 residential units (Class C3), up to 2,500sqm of employment use (Class B1); up to 500sqm of retail space (Class A1); 3,100 to 4,750sqm of community use; medical centre and early years facility (Class D1); in addition to up to 3,000sqm flexible retail use (Class A1/A3/A4) or workspace use (Class B1); new landscaping; parks, public realm; energy centre; gas pressure reduction station; up to 1,098 car parking spaces; cycle parking; landscaping and associated works. The application is accompanied by an Environmental Statement pursuant to the Town and Country Planning Regulations (Environmental Impact Assessment) 2011.	14/AP/3844	Significantly Progressed Approved 05 Aug 2015
		Minor material amendments to planning permission 14/AP/3843 for Demolition of existing buildings and redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 to 20 storeys in height (9.45m - 72.2m AOD), providing 830 residential dwellings (Class C3); flexible community use, early years facility (Class D1) or gym (Class D2); public and private open space; formation of new accesses and alterations to existing accesses; energy centre; gas pressure reduction station; associated car and cycle parking and associated works. The proposed amendments include: Provision of an additional 12 units (including three townhouses in place of the Gas Pressure Reduction Station); Revisions to unit and tenure mix; Internal reconfiguration and elevational alterations; Minor alterations to landscape layouts, amenity space and roof space.	17/AP/3885	Significantly Progressed Approved 14 Feb 2019
3	Aylesbury Estate Site Phase 2B Land Bounded By Thurlow Street And Albany Road And Kinglake Street And Bagshot Street London Southwark SE17 And SE5	Demolition of the existing buildings and redevelopment to provide a mixed use development comprising five buildings ranging in height from 5 to 26 storeys with basements, providing a total of 614 new homes (Class C3); flexible floorspace for commercial business and service uses (Class E) and local community and learning uses (Class F1/F2(a)(b) public open space and playspace private and communal amenity space formation of new accesses and routes within the site alterations to existing accesses; and associated car and cycle parking; refuse storage and hard and soft landscaping; and associated works. The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Environmental Statement can be viewed online at the planning register. Hard copies of the complete ES can be purchased from HGH for a fee or an electronic version can be sent free of charge in PDF format, upon request.	22/AP/2226	Approved 17 Jan 2023
4	Malt Street Regeneration Site Land Bounded By Bianca Road Latona Road Haymerle Road Frensham Street And Malt Street London SE1	Hybrid application comprising a full planning application for Phase 1 (the 'Detailed Component') and outline planning permission (the 'Outline Component') for Phases 2 & 3: Detailed Component (Phase 1): Full planning permission for the demolition of existing buildings and structures and redevelopment of the central area for the erection of a total of 4 buildings, two at 7 storeys (Buildings B9& part B12), one at 15 storeys (Building B10), and one at 44 storeys (Building B4) (max height 147.12m AOD) to provide 420 homes, 1,197 sqm GEA of Class B1(c) floorspace and 785 sqm GEA of non-residential floor space within classes A1-A4 (retail), Class B1 (business) and Class D1 (public services) and D2 (entertainment and leisure) use, an energy centre (750 sqm) and new public open space and public realm with on street and basement car parking spaces and cycle spaces. Outline Component (Phase 2 & 3): Outline planning permission (scale, layout, landscaping, access and appearance reserved) for the demolition of existing buildings and structures and the erection of eight buildings (B1, B2, B3, B5, B6, B7, B11 and part B12) ranging in height from 5 to 35 storeys (max height 132.9m AOD) to provide up to 88,052sqm floorspace GEA, comprising up to 880 residential units, up to 3,316 sqm GEA of Class B1(c) floorspace and up to 1,702sqm GEA of non-residential floor space within Classes A1-A4 (retail), Class B1 (business), Class D1 (public services) and D2 (entertainment and leisure) use and car parking spaces at ground level and cycle spaces, with associated new open space, public realm, car parking and associated works. Totals: Up to 1,300 homes and up to 7,000sqm commercial floorspace.	17/AP/2773	Commenced Approved 30 Oct 2020
		Application for Reserved Matters (scale, layout, landscaping, access and appearance) relating to Blocks B1, B2, B3 and B11 and all associated landscaping, car parking and ancillary works on land bounded by Glengall Road, Ossory Road, Bianca Road, Haymerle Road and Latona Road, London, SE1 and pursuant to Hybrid permission 17/AP/2773. The proposals comprise the construction of 4 buildings ranging from 5 to 24 storeys in height (26.7m to 83.45m AOD), for 269 residential units, 4,128 sqm GEA of non-residential floorspace for retail, workspace and leisure (Use Classes A1-A4, B1c, D1 and D2), landscaping, new public realm, basement comprising parking and plant areas.	20/AP/3242	Commenced Approved 18 Feb 2021
5	Land At Cantium Retail Park 520 Old Kent Road London SE1 5BA	Demolition of existing buildings and redevelopment of the site to provide a new basement level and buildings ranging from 3 to 48 storeys in height (max height 159.05m above ground level) comprising up to 1,113 residential units (Class C3), up to 5,659 sq. m of office floorspace (Class B1(a)), up to 2,228 sq. m of retail floorspace (Class A1), up to 2,336 sq. m of flexible space including use within Classes A1, A3, D1, D2 and / or Sui Generis (Theatre) within Block B and up to 596 sq. m of flexible space within Classes A1, A2 and / or A3 within Block C together with associated access, car parking, landscaping and infrastructure works. The application is accompanied by an Environmental Statement which can be purchased from Ramboll (london@ramboll.co.uk) at a cost of £10 per copy for a CD and £698+VAT for a hard copy.	18/AP/3246	Approved 12 Feb 2021
6	840 Old Kent Road London SE15 1NQ	Demolition of existing building and redevelopment of the site to provide a new building of up to 13 and 21 storeys in height (maximum height 73.60m above ground level). Redevelopment to comprise 170 residential units (Class C3), a 1,778 sqm (GIA) retail unit (Class A1) and a 52 sqm (GIA) flexible retail unit (Class A1/A3), with associated landscaping, car parking, servicing, refuse and plant areas, and all ancillary or associated works.	19/AP/1322	Significantly Progressed Approved 20 Nov 2019
7	Land At 313-349 Ilderton Road London SE15	Demolition of existing buildings and construction of two buildings, one of part 11 and 13 storeys and one of part 13 and 15 storeys, to provide 1,526sq.m (GIA) of commercial floorspace (Use Class B1c), 250 student accommodation bed spaces (Sui Generis) and 58 residential units (Use Class C3), with associated access and highway works, amenity space, cycle parking spaces, disabled car parking spaces and refuse/ recycling stores.	20/AP/1329	Significantly Progressed Approved 13 May 2021
8	Land Bounded By Ruby Street Murdock Street And 685-695 Old Kent Road London SE15 1JS	Demolition of existing buildings and erection of and construction of a part 3, part 7, part 22 storey building (76.6m) from ground level with roof top level amenity space, comprising 111 dwellings, 1,151 sqm (GIA) of D1 floorspace for a church with ancillary communal facilities, 2,173 sqm (GIA) of workspace (B1a and B1c Use Class) and 87 sqm (GIA) of A1/A2/B1 floorspace, with associated landscaping, car and cycle parking, servicing and refuse and recycling facilities. (This application represents a departure from strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and saved policy 1.2 'strategic and local preferred industrial locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location).	18/AP/0196	Commenced Approved 22 Dec 2020
9	651-657 Old Kent Road London SE15 1JU	Demolition of existing buildings on the site and the comprehensive mixed-use redevelopment of the site comprising of two buildings of 10-storeys plus mezzanine (up to 38.900m AOD) and 19-storeys plus mezzanine (up to 71.500m AOD), comprising 262 residential units (Use Class C3 use), 2,320sqm GEA of flexible retail and commercial floorspace (Class A1/A2/A3/A4/B1 uses) at ground and mezzanine level, new public park, private and communal amenity space, associated car and cycle parking, access and servicing arrangements, plant and other associated works.	19/AP/1710	Commenced Approved 06 Dec 2021
10	Ruby Triangle Site Land Bounded By Old Kent Road Ruby Street And Sandgate Street London SE15 1LG	Full planning permission is sought for demolition of existing buildings and structures on the site, and redevelopment consisting of three buildings at maximum heights of 17 storeys (including mezzanine) (+64.735m AOD), 48 Storeys (+170.830m AOD) and 40 storeys (including mezzanine) (+144.750m AOD), plus single storey basement under part of the site. Development would provide 1,152 residential dwellings (Class C3), retail, business and community spaces (Classes A1, A2, A3, A4, B1(a),(b),(c) and D1), public sports hall and gym (Class D2), public and private open space, formation of new accesses and alterations to existing accesses, energy centre, associated car and cycle parking and other associated works. (REVISED DESCRIPTION) This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location. THE APPLICATION IS ACCOMPANIED BY AN ENVIRONMENTAL STATEMENT submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) regulations 2017. The ES can be	18/AP/0897	Commenced Approved 06 Jun 2019

ID	Site Name	Description	App Ref	Status
		viewed on the Council's website. Copies of the ES may be obtained from rubytriangle@glhearn.com at a charge of £20 for CD copy of the full ES, £150 for a hard copy of the ES Main Report (Volume 1), £100 for a hard copy of the ES Drawings and Appendices (Volume 2). There would be no charge for an emailed copy or single hard copy of the Non Technical Summary (Volume 3).		
11	6-12 Verney Road London SE16 3DH	Redevelopment of the site for a mixed use development comprising three buildings (Building 1: basement, ground, ground mezzanine plus 17 storeys (AOD 66.975m); Building 2: basement, ground, ground mezzanine plus 22 storeys (AOD 81.975m); Building 3: basement, ground, ground mezzanine plus 16 storeys (AOD 62.675m) to accommodate 338 residential unit, 5,234 Sqm GEA of commercial floor space (Class B1(c)), associated cycle and car parking, servicing, refuse and recycling, landscaping including contribution towards the new Surrey Canal linear park, and private and communal residential amenity space and children's playspace. (This application represents a departure from strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and saved policy 1.2 'strategic and local preferred industrial locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location).	17/AP/4508	Approved 10 Feb 2022
		Demolition of existing buildings and structures on the site and redevelopment to provide an up to four storey building to accommodate industrial and logistics (Use Class B2, B8 and Class E(g)) plus part ground floor flexible Ea and/or Eb together with plant, landscaping, the formation of new accesses and alterations to existing accesses, associated vehicle and cycle parking and other associated works (as revised on 29.02.2024 and 29.04.2024).	23/AP/0948	Validated 09 May 2023
12	227-255 Ilderton Road London SE15 1NS	Demolition of existing buildings and the erection of a part 2/3, 9 and 28 storey (up to 94.65m AOD) mixed-use development comprising of 3,581 sqm including 2,538 sqm of industrial floorspace (Use Classes B1c/B8) at ground and intermediate levels, 598 sqm of internal loading yard, 445 sqm ancillary plant and equipment; and 253 residential apartments (C3), 35.75% affordable by habitable room, and other associated infrastructure. This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location.	19/AP/1773	Significantly Progressed Approved 29 Jan 2021
13	747-759 & 765-775 Old Kent Road London SE15 1NZ & Land At Devonshire Grove SE15 1NZ	Phased mixed-use redevelopment of the site, comprising: - Demolition of all existing buildings/structures, site clearance and excavation; - Construction of buildings to provide residential dwellings (Class C3) and flexible commercial, business and service space (Class E); - Construction of buildings to provide purpose built student accommodation including associated amenity and ancillary space, flexible commercial, business, service and community spaces within Classes E/F2(b) (Sui Generis); and - Provision of associated car and cycle parking, open space and landscaping, means of access and highway alterations, installation of plant and utilities and all other associated ancillary works incidental to the development.	23/AP/1862	Approved 26 April 2024
14	Open Land Rear Of 1-51 Peckham High Street Bounded By Sumner Avenue And Melon Road Open Land Adjacent To 59 Peckham High Street And Sumner House Located On Sumner Road London	Redevelopment of the site to provide four buildings to deliver 168 residential dwellings (Class C3) and flexible retail floor space (247m2) of flexible A1/A3/A4: The works include the conversion and extension of Sumner House (Block A) from office use (Class B1-c) to provide 44 no flats and 4 no townhouses and partial demolition of a boundary wall; the erection of a part 4, part 6 storey block to provide 39 no flats on Sumner Avenue (Block B); a part four, part 6 storey building to provide 72 no. flats on Jocelyn Street (Block C); and a four storey block providing 9 flats on Melon Road (Block D), with 247m2 of flexible A1/A3/A4 use at ground floor level, together with car parking, hard and soft landscaping, and other associated works incidental to the development.	16/AP/4018	Significantly Progressed Approved 15 Nov 2019
15	Vacant Site Opposite Central Venture Park Commercial Way SE15 (On The Site Of Former 25 Commercial Way),	Redevelopment of existing site to provide a residential development comprising the erection of two x 9-storey buildings and 2 x 5 storey buildings on either side of re-aligned Cronin Street, providing 109 residential dwellings (100% Affordable) , 10 no. car parking space together with access, hard and soft landscaping and other associated works incidental to the development	16/AP/4702	Significantly Progressed Approved 21 May 2018
16	Ledbury Estate Commercial Way London Southwark	Redevelopment of the Ledbury Estate involving the demolition of Bromyard House, Skenfirth House, Sarnsfield House and Peterchurch House and the erection of 6 blocks ranging in height from 5 to 22 storeys to provide 340 new homes (including 224 replacement homes) and some non-residential space at ground level, together with access, servicing, car parking, cycle parking, cycle storage, plant, play and open space and landscaping.	22/AP/0554	Approved 15 Dec 2022
17	Southernwood Retail Park 2 Humphrey Street London SE1 5JJ	Hybrid Application: - Full planning permission for 'Phase 1' comprising demolition of existing buildings and the erection of a part 9, part 14, part 16, part 48 storey development (plus basement) up to 161.25m AOD, with 844 sqm GIA of (Class A1) retail use, 477 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use, 8671 sqm GIA (Class C1) hotel; 542 (class C3) residential units (51,499 sqm GIA); landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works. - Outline planning permission (with details of internal layouts and external appearance reserved) for 'Phase 2' comprising demolition of existing buildings and the erection of a part 9, part 12, storey development (plus basement) up to 42.80m AOD, with 1049 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use; 183 (Class C3) residential units (17,847 sqm GIA), 856 sqm GIA (Class D2) cinema and the creation of a 461 sqm GIA (Class C1) hotel service area at basement level; landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works	18/AP/3551	Approved 20 Jan 2022
18	Dulwich Hamlet Football Ground	Redevelopment of the Dulwich Hamlet Football (Champion Hill) Stadium, including the demolition of existing buildings, and use of land at Greendale, to provide: - the erection of a new stadium with relocated playing pitch with associated floodlighting and boundary treatment, and part two-part three storey clubhouse building with sports and leisure facilities, with capacity for 4,000 spectators (Use Class D2); - the construction of a multi-functional kickabout space and associated boundary treatment; - the erection of a series of buildings between four and six storeys in height to provide 219 residential dwellings, (Use Class C3); - associated car parking, cycle parking, refuse storage and access road; - the widening and greening of a public route with associated hard and soft landscaping; - the relocation of telecommunications equipment and re-provision of the substation together with plant and equipment.	19/AP/1867	Approved 21 Feb 2022
19	40-46 Solomons Passage	Demolition of all buildings on the site and construction of a development of 91 residential units within four buildings (a 7-storey Block A building, a 6-storey Block B/C building and two buildings in Block D of 2- and 4-storeys), together with alterations to the retained basement, provision of car and cycle parking and landscaping.	20/AP/3285	Approved 20 April 2022
20	25-33 Parkhouse Street	The redevelopment of the site to provide a mixed-use development comprising buildings up to 11 storeys in height and accommodating new homes (Use Class C3) and commercial floorspace (Use Class B1c), car parking, cycle parking and associated landscaping	20/AP/0858	Commenced Approved 27 May 2022

ID	Site Name	Description	App Ref	Status
21	Bells Gardens Community Centre	Construction of 97 homes, alongside the provision of the existing community facilities on the site as well as new landscaped areas	21/AP/1077	Approved 29 Jan 2022
23	Ilderton Wharf 1-7 Rollins Street London Southwark SE15 1EP	Demolition of existing buildings and erection of a mixed use development comprising a building of part 9, 23 and 25 storeys above ground to provide a replacement builders merchants with associated office, trade counter sales area , showroom and external storage/racking, a commercial unit fronting Ilderton Road (Use Class E) 170 residential apartments (Use Class C3) and other associated infrastructure.	21/AP/4757	Approved 28 June 2024
25	Surrey Canal Triangle To North Of, Surrey Canal Road, London, SE14	An application submitted under Section 73 of the Town & Country Planning Act 1990 for a minor material amendment to planning permission (DC/11/76357) for the comprehensive, phased, mixed use development of the site on the land to the north and south of Surrey Canal Road, for up to 240,000sqm (GEA) of development as set out in the revised Development Specification dated 1 July 2011 as amended 2 September 2011. The principal elements of the outline planning permission comprise up to 2,400 homes (Class C3); retail (Class A1-A5); business space (Class B1); hotel (Class C1); non-residential institutions (Class D1); assembly and leisure (Class D2) excluding the Millwall FC stadium. The demolition of all existing buildings on the site with the exception of the Millwall FC Stadium (retained and its facade upgraded and/or re-clad), Guild House (retained and extended) and Rollins House (retained); re-profiling of site levels; alterations to Surrey Canal Road and the re-alignment of Bolina Road; associated works and landscaping in order to allow alterations to the development by way of:- The reconfiguration of buildings on Plots Timber Wharf, Stockholm 1 & 2 and Senegal Way 1& 2 and the redistribution of land uses between these Plots, within the overall approved development by floorspace area and land use. Amendments to the massing of buildings and their heights on Plots Timber Wharf, Stockholm 1 & 2 and Senegal Way 1& 2 as well as changes to the distribution of uses amongst these Plots including the redistribution of part of the proposed residential accommodation from the south side of Surrey Canal Road to the north and of the approved leisure uses. Amendments to the Parameter Plans to reflect the changes referred to above, principally in respect of the massing of buildings and building heights, an alteration to a parking space and loading bay, landscape, open space and public realm; massing of buildings and building heights for Plots: Timber Wharf 1 and Timber Wharf 2 (Phase 2), Stockholm 1 and Stockholm 2 (Phase 3), Senegal Way 1 and Senegal Way 2 (Phase 4)."	DC/13/085143 *LB Lewisham*	Approved 18 Dec 2015
26	79-161 Ilderton Road London SE16 3JZ	Redevelopment of 79 -161 Ilderton Road to provide two separate buildings, a north building and a south building separated by a publicly accessible childrens playspace. The erection of a north building to include a part 5, part 6, part 16 and part 28 storey development (93.350m AOD max). The erection of a south building to include a part 3, part 5, part 8, part 13 storey development (49.275m AOD max). To deliver a total of 312 residential units, 448.6sqm GIA of retail floorspace (Use Class A1), 1,817.98sqm GIA of commercial floorspace (Use Class B1) and associated basement provision, disabled parking, cycle parking, childrens playspace, public realm improvements and landscaping. This application represents a departure from strategic policy 10 Jobs and Businesses of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a Preferred Industrial Location.	18/AP/2497	Approved 21 Feb 2022
Submitted & Pending Determination				
22	812 Old Kent Road London SE15 1NH	Demolition of existing building and construction of new part 6, part 7, part 12, part 19 storey building plus basement to provide 154 residential units (Use Class C3) and 1,950 sq.m of commercial floorspace (Use Class B1). The provision of public and private open space, landscaping, car and cycle parking a service area and other associated works.	19/AP/0994	Validated 31 May 2019 Pending Decision
24	Land At Surrey Canal Road, Stockholm Road, Bolina Road And, Rollins Street, London, SE16	Hybrid planning application for the redevelopment of land at Surrey Canal Road, Stockholm Road, Bolina Road and Rollins Street, London SE15 and SE16 comprising: FULL planning application for Phase 1 comprising the demolition of existing buildings at Orion Business Centre and construction of residential dwellings together with auditorium, meeting rooms, offices, and restaurant/ café floorspace (Sui Generis and Class E) within a podium, with associated vehicular and cycle parking, public realm, amenity space, landscaping and infrastructure; and OUTLINE planning application for demolition of existing buildings (with the exception of Guild House and part of Rollins House which are to be retained) and construction of up to 400,000sqm of floorspace, comprising residential floorspace (Class C3), business floorspace, leisure floorspace, retail, food and drink floorspace and non-residential institution floorspace (Class E), learning and non-residential institutions (Class F1), pubs and takeaways (Sui Generis) together with associated basements, vehicular and cycle parking, public realm, amenity space, landscaping, highway works and infrastructure (scale, layout, landscaping, access and appearance reserved).	DC/20/119706 LB Lewisham	Resolution to Grant 27 Jan 2022 Pending Decision
27	310-330 St Jamess Road London Southwark SE1 5JX	Retention of existing Live /work unit and redevelopment of the site comprising demolition of existing buildings and erection of three buildings to provide new residential development and the provision of flexible Class E floorspace with public realm improvements, amenity space, cycle parking spaces, disabled car parking spaces and refuse/recycling stores and other associated works.	21/AP/1667	Validated 14 May 2024 Awaiting Decision
28	Daisy Business Park, 19-35 Sylvan Grove, London SE15 1PD	Redevelopment to provide a mixed use development comprising student accommodation (Sui Generis) 688 student rooms, residential accommodation, 23 units, all of which would be affordable and equate to 14% habitable rooms on site (Use Class C3), 68 sqm community floor space (Use Class F2) and 1,983 sqm commercial workspace (Use Class E(g)) within two buildings of up to 7 storeys and basement and 34 storeys and basement with associated car and cycle parking, landscaping, public realm and highways improvements	23/AP/0582	Validated 02 June 2023 Awaiting Decision



Cumulative Schemes	
Schemes that are Approved and which form part of the Cumulative Assessment	
1.	213 Rye Lane London (within evolved baseline)
2.	Aylesbury Estate Phase 1
3.	Aylesbury Estate Site Phase 2B
4.	Malt Street Regeneration Site Land
5.	Land At Cantium Retail Park
6.	840 Old Kent Road
7.	Land At 313-349 Ilderton Road
8.	Land Bounded By Ruby Street Murdock Street And 685-695 Old Kent Road
9.	651-657 Old Kent Road
10.	Ruby Triangle Site Land
11.	6-12 Verney Road
12.	227-255 Ilderton Road
13.	747-759 & 765-775 Old Kent Road & Land At Devonshire Grove
14.	Open Land Rear Of 1-51 Peckham High Street
15.	Vacant Site Opposite Central Venture Park Commercial Way
16.	Ledbury Estate Commercial Way
17.	Southernwood Retail Park 2 Humphrey Street
18.	Dulwich Hamlet Football Ground
19.	40-46 Solomons Passage
20.	25-33 Parkhouse Street
21.	Bells Gardens Community Centre
23.	Ilderton Wharf 1-7 Rollins Street
25.	Surrey Canal Triangle
26.	79-161 Ilderton Road
Submitted and Pending Determination	
22.	812 Old Kent Road
24.	Land A at Surrey Canal Road, Stockholm Road, Bolina Road And, Rollins Street
27.	310-330 St James's Road
28.	Daisy Business Park, 19-35 Sylvan Grove

Appendix: Daylight, Sunlight and Overshadowing

Annex 1: Hanover Park Floorplans

Annex 2: LBS Case Officer Report

Annex 3: Clarion Housing Key Worker Scheme Rents Schedule

Appendix: Daylight, Sunlight and Overshadowing

Annex 1: Hanover Park Floorplans

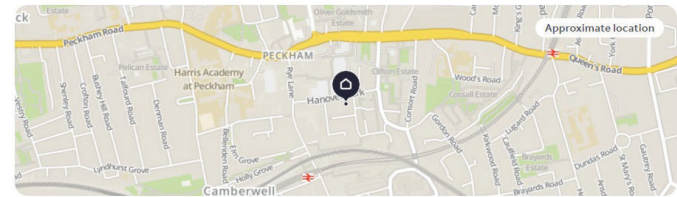
Annex 2: LBS Case Officer Report

Annex 3: Clarion Housing Key Worker Scheme Rents Schedule

House Price History

40c, Hanover Park, Peckham, London, Greater London SE15 5HS

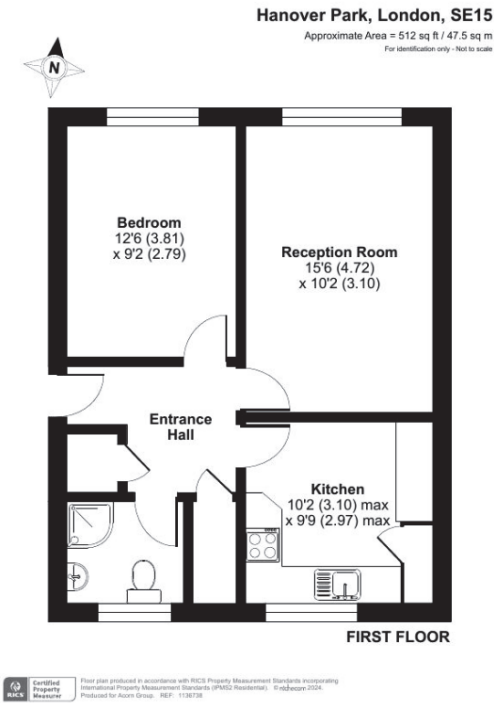
Apartment 1 1



Property sale history

Date sold	Price	Property	Tenure
03 Aug 2018	£290,000	Flat	Leasehold

House price data produced by the HM Land Registry. English and Welsh house price data is publicly available. Information produced by the HM Land Registry. Last updated 14 November 2024



Appendix: Daylight, Sunlight and Overshadowing

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Nunhead and Peckham Rye COMMUNITY COUNCIL

8 September 2010

CASE OFFICER REPORT RECORD SHEET

Proposal (10-AP-1240)	Address
Change of use of the ground floor communal room to an office (Class B1), associated with the flats within the residential building.	81 HANOVER PARK, LONDON SE15 5HD
	Ward The Lane

Case Officer: Andre Verster

Recommendation proposed by Case Officer:

Signed *ML* date 13 AUGUST 2010

Recommendation cleared by Team Leader / Group Manager:

Signed *ASmith* date 19/8/10

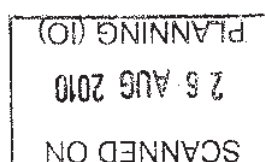
Recommendation cleared by Head of Development Management:

Signed *[Signature]* date 19.8.2010

**Recommendation NOT cleared by Team Leader / Group Manager OR
Head of Development Management**

Signed _____ date _____

Reason Recommendation NOT agreed:



Decision made by Planning Committee / Community Council

Signed _____ date _____

Item No.	Classification: OPEN	Date: 8 September 2010	Meeting Name: Nunhead and Peckham Rye Community Council
Report title:	Development Management planning application: Application 10-AP-1240 for: Full Planning Permission Address: 81 HANOVER PARK, LONDON SE15 5HD Proposal: Change of use of ground floor communal room to office (Class B1) for on-site building management staff.		
Ward(s) or groups affected:	The Lane		
From:	Head of Development Management		
Application Start Date 11/05/2010		Application Expiry Date 06/07/2010	

RECOMMENDATION

- 1 Grant planning permission, subject to conditions.

BACKGROUND INFORMATION

Site location and description

- 2 The site comprises a part five, part seven storey building in residential use located on the junction of Hanover Park and Clayton Road. There are 74 flats which are let as key worker accommodation.
- 3 The site lies within the following designated areas: Peckham Action Area, Major Town Centre - Peckham, Urban Density Zone, Public Transport Accessibility Zone, Cross River Tram Consultation Zone, Peckham Village Archaeological Priority Zone, and an Air Quality Management Area.

Details of proposal

- 4 Change of use of the ground floor communal room to office (Class B1). The room will be used as an office for on-site building management staff, and it measures approximately 48 sq m. It is located centrally within the site.

Planning history

- 5 02/AP/0799: In March 2003 planning permission was granted for an application for demolition of a former leisure centre and the construction of part five, part seven storey building to provide 59 self contained flats and 16 cluster units (with a total of 96 bedrooms) for key worker accommodation.

Planning history of adjoining sites

- 6 None of relevance.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

- 7 The main issues to be considered in respect of this application are:
- a) the principle of the development in terms of land use and conformity with strategic policies.
 - b) the impact on the amenity of neighbouring properties;
 - c) the impact on highway and safety issues.

Planning policy

- 8 Southwark Plan 2007 (July)

Policy 3.2 (Protection of amenity)

Policy 3.8 (Waste Management)

Policy 3.14 (Designing out Crime)

Policy 5.2 (Transport Impacts)

Policy 5.3 (Walking and Cycling)

Policy 5.6 (Car Parking)

Policy 5.7 (Parking Standards for Disabled People)

Policy 7.1 (Peckham Action Area)

Principle of development

- 10 There is no in principle objection to the proposal to change the use from a communal room to an office (Class B1). The communal room is an ancillary use to the primary residential use of the building and there is no policy protecting the communal use of the room. As the proposed office would also be ancillary to the primary residential use of the site there is no objection to the proposed use.
- Policy 7.1 supports small business within the Peckham Action Area. Whilst this proposal is closely linked to a particular residential development, there is policy support for a small office use. As such, the application is compliant with land use policy for the area.
- 11 Local residents have raised concerns that the premises will be used to run a business. This assumption is, however, incorrect as the landlord, Broomleigh Housing Association Limited, intends to use the office in order to establish an on-site management presence for this residential development.
- 12 Local residents request that if permission is granted, it should be subject to conditions ensuring that the office is firmly tied to the management of this building. The reason given is that the building is residential and it would not be good to introduce a independent office use at this location.

- 13 This has been taken into consideration and following discussion with the agent it was agreed that the application be recommended for approval subject to a condition restricting the use of the office to the management of this building only.

Environmental impact assessment

- 14 Not required for this type and scale of development.

Impact of proposed development on amenity of adjoining occupiers and surrounding area

- 15 The application site is centrally located within the building and thus is close proximity to residential units, especially those on the same (ground) floor. An objector is concerned that the proposal would lead to increased noise levels. It is considered that the proposed use would be appropriate in this location as it would not give rise to any amenity issues, such as undue noise and disturbance, to the detriment of neighbouring properties. The proposed opening hours, between 9:00 hours and 17:30 hours, would limit any noise and disturbance in the unlikely event that it would occur. Finally, drawing number 3109057, shows two alternative floor layout plans with no more than four desks. The application form indicates that no more than three employees would be present. It is therefore assumed that the office would not be used by more than three staff at any one time and that such low staffing numbers would not give rise to any concerns regarding noise and disturbance.
- 16 A concern has been raised that the application site abuts the garden which is the only open play space for children living in the block, apart from the corridors, and that this would only lead to friction between office users and residents. The proximity between the application site and the courtyard, to the north, is acknowledged but is considered that an office use would not deter or be detrimental to children playing in this part of the development. Furthermore, the site only abuts the courtyard on one side and only approximately a third of the southern end of the courtyard, leaving more than adequate space for children to play - if children wish to avoid playing in close proximity of the office use if there is adequate space to do so.
- 17 Objectors have raised the issue that the communal room has not been available to residents as residents have not been given any rights to access the room. It is considered that this a management issue and that the application can not be refused on the basis of the loss of a communal room as there is no planning policy requiring a block of flats to provide such a facility. A new block of flats may be required to provide useable outdoor amenity areas, but there is no requirement to provide or protect facilities such as a communal room.

Impact of adjoining and nearby uses on occupiers and users of proposed development

- 18 The application site is surrounded by residential units which would not be detrimental to the use of the application site as an office.

Traffic issues

- 19 Residents have raised concerns that the staff working in the office would be using the existing parking facilities and car parking spaces. It has been requested that parking restrictions should be imposed as there is not enough parking on site for residents and that there is no reason why staff should take priority - particularly over families in the building.
- 20 The application site has a high Public Transport Accessibility Level (PTAL) of 6a

meaning that it has good access to the public transport network, offering staff short travelling distances to transport hubs with services. The site is also located within a Controlled Parking Zone (CPZ) operating Monday to Saturday between 08.30 and 18.30. The CPZ was implemented in 1974 and reviewed and extended in 2006/07.

- 21 Given the high PTAL and the modest floor area of the site, combined with a maximum of only three full-time employees it is considered that the proposal will not have a detrimental impact on highway and pedestrian safety issues and would not impede in existing parking arrangements on the site.

Design issues

- 22 No external alterations are proposed thus there are no design issues to consider.

Impact on character and setting of a listed building and/or conservation area

- 23 There are no listed buildings in the vicinity and the site is not located within a conservation area.

Impact on trees

- 24 There are a number of street trees along the east side of Clayton Road, on the opposite side of the road of the building wherein the unit is located. As no external alterations are proposed the proposal would have no impact on any trees in the vicinity of the site.

Planning obligations (S.106 undertaking or agreement)

- 25 None identified.

Sustainable development implications

- 26 None identified.

Other matters

Security

- 27 An objector advised that residents have had a day-time on-site manager since occupation of the building, following completion in 2005. Objectors are confused by the suggestion that this is something new that will counter ongoing 'antisocial behaviour' and that residents do not expect much to change because the manager's office is moved a few yards.
- 28 Officers consider that the proposal would not give rise or alter security measures in the building as only three full-time staff would use the room. The issue of anti-social behaviour is not considered a central reason for granting permission, but officers recognise that an on-site presence may assist the applicant in addressing their concerns in this regard. Members should however note that the information submitted as part of the application does not indicate that there is an on-site manager currently present on site.
- 29 Objectors also consider that there are security issues and issues around the likely change in character of the building if outside non-residential users came in. This is however not considered an area of concern for officers as the three full-time employees would be present on site with the primary function of providing a management function for the benefit of residents.

Consultation:

- 30 Objectors raised concerns that the proposed change was not notified to residents by notices displayed on the property. It is not clear whether there is an expectation from objectors that the said notices referred to should be erected by both the applicant and the local planning authority. Whilst it would be good practice for the applicant to engage with residents, be it by letter or site notice, there is no requirement within planning legislation for this to take place. The local planning authority on the other hand fulfilled their duty and posted a site notice in the vicinity of the site on 25 May 2010.

Conclusion on planning issues

- 31 As the proposed office would be ancillary to the primary residential use of the site there is no objection to the principle of change of use. The proposed use would be appropriate in this location as it would not give rise to any amenity issues, such as undue noise and disturbance. The proposed opening hours, between 9:00 hours and 17:30 hours, also assist in reducing the impact on neighbour amenity. Issues relating to security and parking were considered and it is concluded that the proposal would not give rise to any concerns in this regard.

Community impact statement

- 32 In line with the Council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.

a) The impact on local people is set out above.

b) The following issues relevant to particular communities/groups likely to be affected by the proposal have been identified: none.

c) The likely adverse or less good implications for any particular communities/groups have been also been discussed above. Specific actions to ameliorate these implications are: none.

Consultations

- 33 Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1.

Consultation replies

- 34 Details of consultation responses received are set out in Appendix 2.

Summary of consultation responses

- 35 17 Purdon House:

Loss of a facility that has been so useful to the community.

Parking in residents spaces.

Increased noise levels.

Flat 73A, 81 Hanover Park:

The communal room should be retained.

The proposal is not the right vehicle to address 'antisocial behaviour' issues.

Permission should be subject to conditions ensuring that the office is firmly tied to the management of this building.

Security issues and issues around the likely change in character of the building due to the presence of outside non-residential users.

Parking restrictions should be imposed.

The application was not notified to residents by notices displayed on the property.

Flat 65, 81 Hanover Park:

The communal room should not be made into an office but be made available for residents to promote community activities for all living at the property.

Human rights implications

- 36 This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
- 37 This application has the legitimate aim of providing an on-site management facility. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Strategic Director of Communities, Law & Governance

- 38 Na

REASONS FOR LATENESS

- 39 Na

REASONS FOR URGENCY

- 40 Na

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2777-A	Regeneration and Neighbourhoods Department	Planning enquiries telephone: 020 7525 5403
Application file: 10-AP-1240	160 Tooley Street	Planning enquiries email: planning.enquiries@southwark.gov.uk
Southwark Local Development Framework and Development Plan Documents	London SE1 2TZ	Case officer telephone: 020 7525 5457
		Council website: www.southwark.gov.uk

APPENDICES

No	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received

AUDIT TRAIL

Lead Officer		
Report Author	Andre Verster	
Version	Final	
Dated	13 August 2010	
Key Decision		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Communities, Law & Governance	No	No
Strategic Director of Regeneration and Neighbourhoods	No	No
Strategic Director of Environment and Housing	No	No
Date final report sent to Constitutional / Community Council / Scrutiny Team		

APPENDIX 1

Consultation undertaken

- 41 **Site notice date:** 25/05/2010
- 42 **Press notice date:** Not required
- 43 **Case officer site visit date:** 25 May 2010
- 44 **Neighbour consultation letters sent:** 24 May 2010

Internal services consulted:

- 45 None

Statutory and non-statutory organisations consulted:

- 46 None

47 Neighbours and local groups consulted:

20A HANOVER PARK LONDON SE15 5HG
 27 YARNFIELD SQUARE LONDON SE15 5JD
 29 YARNFIELD SQUARE LONDON SE15 5JD
 31 YARNFIELD SQUARE LONDON SE15 5JD
 33 YARNFIELD SQUARE LONDON SE15 5JD
 35 YARNFIELD SQUARE LONDON SE15 5JD
 37 YARNFIELD SQUARE LONDON SE15 5JD
 38 YARNFIELD SQUARE LONDON SE15 5JD
 41 YARNFIELD SQUARE LONDON SE15 5JD
 43 YARNFIELD SQUARE LONDON SE15 5JD
 44 YARNFIELD SQUARE LONDON SE15 5JD
 46 YARNFIELD SQUARE LONDON SE15 5JD
 11 ROBERT KEEN CLOSE LONDON SE15 5HT
 7 ROBERT KEEN CLOSE LONDON SE15 5HT
 9 ROBERT KEEN CLOSE LONDON SE15 5HT
 26 HANOVER PARK LONDON SE15 5HS
 32 HANOVER PARK LONDON SE15 5HS
 36 HANOVER PARK LONDON SE15 5HS
 44 HANOVER PARK LONDON SE15 5HS
 46 HANOVER PARK LONDON SE15 5HS
 50 HANOVER PARK LONDON SE15 5HS
 54 HANOVER PARK LONDON SE15 5HS
 56 HANOVER PARK LONDON SE15 5HS
 40A HANOVER PARK LONDON SE15 5HS
 40B HANOVER PARK LONDON SE15 5HS
 40D HANOVER PARK LONDON SE15 5HS
 40F HANOVER PARK LONDON SE15 5HS
 28 HANOVER PARK LONDON SE15 5HS

PECKHAM LEISURE CENTRE HANOVER PARK LONDON SE15 5HS

FLAT 1 24 HANOVER PARK LONDON SE15 5HS

FLAT 2 24 HANOVER PARK LONDON SE15 5HS

FLAT 4 24 HANOVER PARK LONDON SE15 5HS

12D 81 HANOVER PARK LONDON SE15 5HD

28B 81 HANOVER PARK LONDON SE15 5HD

28D 81 HANOVER PARK LONDON SE15 5HD

28E 81 HANOVER PARK LONDON SE15 5HD

29A 81 HANOVER PARK LONDON SE15 5HD

29C 81 HANOVER PARK LONDON SE15 5HD

20 81 HANOVER PARK LONDON SE15 5HD

22 81 HANOVER PARK LONDON SE15 5HD

24 81 HANOVER PARK LONDON SE15 5HD

25 81 HANOVER PARK LONDON SE15 5HD

27A 81 HANOVER PARK LONDON SE15 5HD

27C 81 HANOVER PARK LONDON SE15 5HD

11F 81 HANOVER PARK LONDON SE15 5HD

12C 81 HANOVER PARK LONDON SE15 5HD

32 81 HANOVER PARK LONDON SE15 5HD

29E 81 HANOVER PARK LONDON SE15 5HD

29F 81 HANOVER PARK LONDON SE15 5HD

30B 81 HANOVER PARK LONDON SE15 5HD

30D 81 HANOVER PARK LONDON SE15 5HD

30F 81 HANOVER PARK LONDON SE15 5HD

27D 81 HANOVER PARK LONDON SE15 5HD

27E 81 HANOVER PARK LONDON SE15 5HD

12E 81 HANOVER PARK LONDON SE15 5HD

13A 81 HANOVER PARK LONDON SE15 5HD

13C 81 HANOVER PARK LONDON SE15 5HD

1 81 HANOVER PARK LONDON SE15 5HD

3 81 HANOVER PARK LONDON SE15 5HD

4 81 HANOVER PARK LONDON SE15 5HD

6 81 HANOVER PARK LONDON SE15 5HD

8 81 HANOVER PARK LONDON SE15 5HD

10 81 HANOVER PARK LONDON SE15 5HD

11B 81 HANOVER PARK LONDON SE15 5HD

11C 81 HANOVER PARK LONDON SE15 5HD

11E 81 HANOVER PARK LONDON SE15 5HD

13F 81 HANOVER PARK LONDON SE15 5HD

14B 81 HANOVER PARK LONDON SE15 5HD

14D 81 HANOVER PARK LONDON SE15 5HD

14F 81 HANOVER PARK LONDON SE15 5HD

16 81 HANOVER PARK LONDON SE15 5HD

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Re-consultation:

48 Na

APPENDIX 2

Consultation responses received

Internal services

49 None

Statutory and non-statutory organisations

50 None

Neighbours and local groups

Three letters of objection have been received raising the following concerns:

51 17 Purdon House:

Through this letter I am expressing my total disapproval as this will affect us by taking away a facility that has been so useful to the community.

If this Housing Association or building needed offices they should have thought of it when they built it. It is not like they do not have space at their own building as they have a reception and they can also convert one of their ground floor flats into buildings. They also have a parking spaces for cycles that never gets used as they get damaged or stolen - that spaces within their own building could be constructed as an office for their own business and not use our facilities.

It should not be forgot that if they move into our building they will be using our parking facilities and our spaces.

If it is easy to grant permission for offices in residential areas just because none of you lives here I totally disapprove of this proposal. If permission is granted you are taking the liberty of removing a social communal space without their tenants approval, not to mention that we will have their tenants parking in our spaces and have increased noise levels.

This is our residential space and we do not need someone to deprive us and run their business from our social and community networks space. There are much better ways to maximise the communal area but one of them is not taking it away from the community.

52 Flat 73A, 81 Hanover Park:

Whilst I have been resident at Hanover Park, the communal room has not been available to residents but has been being used to store furniture. Residents have not been given any rights to access the room.

It would have been nice to have access to the communal room, as a possible forum for community activities / interaction, or even a space for residents to meet visitors etc. This would give people scope for the development of a community even within the largely transient population here. As the residents have had no access to the space, there is no opportunity for this to develop.

We have had a day-time on-site manager throughout my time in the building. I am a little confused by the suggestion that this is something new that will counter ongoing 'antisocial behaviour'. I confess that I don't expect much to change because the

manager's office is moved a few yards. As a resident who might be expected to be concerned in the matter, I am also curious as to what is really talked about under the rubric of this general slur, which is not to say that I do not see things like rubbish dropped in lifts from time to time etc. If there is a real problem, might not facilitating interaction between residents and so fostering sense of community be more effective to counter that kind of thing?

If you are minded to grant permission, I would ask you to make very sure that there are strict conditions ensuring that the office is firmly tied to the management of this building. The building is residential and it would not be good to introduce a free-standing office use here. It abuts the garden which is the only open space for children to play in accept the corridors and would only lead to friction.

There are also security issues and issues around the likely change in character of the building if outside non-residential users came in.

Parking restrictions should be imposed. There is not enough parking on site for residents and I see no reason why staff should take priority - particularly over families in the building.

Finally (to avoid the need to write to my landlord separately and on the understanding that this will be copied back to them), I should add that I am surprised that the application states that the proposed change was notified to residents by notices displayed on the property. I have seen no such notice. It would help if notices of relevance to us could be displayed more prominently, and that if construction is intended, the notices could invite comments / views.

53 Flat 65, 81 Hanover Park:

I am very unhappy with the proposal for the ground floor communal room to be changed into office (Class B1) for on-site building management staff.

Peckham is an area with a high level of deprivation, crime, disunity and family breakdown. When I moved into the property I was informed that the communal room was currently being used for storage and would be made available for community / resident functions once all the flats were occupied. The communal room has not been open to residents and would be a great space for residents's meetings, functions, children's clubs etc.

We need to be supporting community and resident involvement so that responsibility and positive mental health is promoted for those living at 81 Hanover Park, many of whom are young children with limited space to play, learn and explore.

I am of the opinion that the communal room should not be made into an office but be made available for residents to promote community activities for all living at the property.

Appendix: Daylight, Sunlight and Overshadowing

Annex 1: Hanover Park Floorplans

Annex 2: LBS Case Officer Report

Annex 3: Clarion Housing Key Worker Scheme Rents Schedule



**CLARION
HOUSING**

Clarion Housing

Maple House
157-159 Masons Hill
Bromley
BR2 9HY

Telephone: 0300 100 0303
myclarionhousing.com

[Clarion Key Worker Scheme](#)
[Current Rents 2022/23](#)

Size	Maximum Occupants	Council Tax Included?	Water Rates Included?	Security	Parking per Space (Monthly)	Rent (Monthly)
72 Grove Vale, East Dulwich, London, SE22 8DT						
Cluster Room	1	Yes	Yes	No	No Parking	£604.76
Single Studio	1	No	Yes	No	No Parking	£692.81
Double Studio	2	No	Yes	No	No Parking	£854.33
Sir James Black House, Coldharbour Lane, London, SE5 9NX						
Cluster Room	1	Yes	Yes	No	No Parking	£596.07
St Giles House, St Giles Road, Camberwell, SE5 7UD						
Double Studio	2	No	Yes	No	No Parking	£689.24
1 Bedroom Flat	2	No	Yes	No	No Parking	£955.45
2 Bedroom Flat	3	No	Yes	No	No Parking	£1218.40
81 Hanover Park, Peckham, London, SE15 5HD/E						
Single Studio	1	No	Yes	Yes	No Parking	£658.97
2 Bedroom Flat	3	No	Yes	Yes	No Parking	£1132.88
3 Bedroom Flat	4	No	Yes	Yes	No Parking	£1404.03
Bertha James Court, Masons Hill, Bromley, BR2 9HJ						
Cluster Room	1	Yes	Yes	No	£32.98	£566.44
1 Bedroom Flat	2	No	Yes	No	£32.98	£719.20
Balmoral Lodge, 2 Prudence Lane, Orpington, BR6 8RE						
1 Bedroom Flat	2	No	Yes	No	£31.05	£788.66
2 Bedroom Flat	3	No	Yes	No	£31.05	£1002.17
3 Bedroom Flat	4	No	Yes	No	£31.05	£1035.24
Clarence Lodge, 4 Prudence Lane, Orpington, BR6 8RE						
Cluster Room	1	Yes	Yes	No		£662.16
Sandringham Lodge, 1 Prudence Lane, Orpington, BR6 8RE						
1 Bedroom Flat	2	No	Yes	No		£788.66
2 Bedroom Flat	3	No	Yes	No		£990.73
3 Bedroom Flat	4	No	Yes	No		£1035.24
Hudson Court, 1c Portland Road, South Norwood, London, SE25 4UE						
1 Bedroom Flat	2	No	No	No	Free	£745.88

Appendix: Wind Microclimate

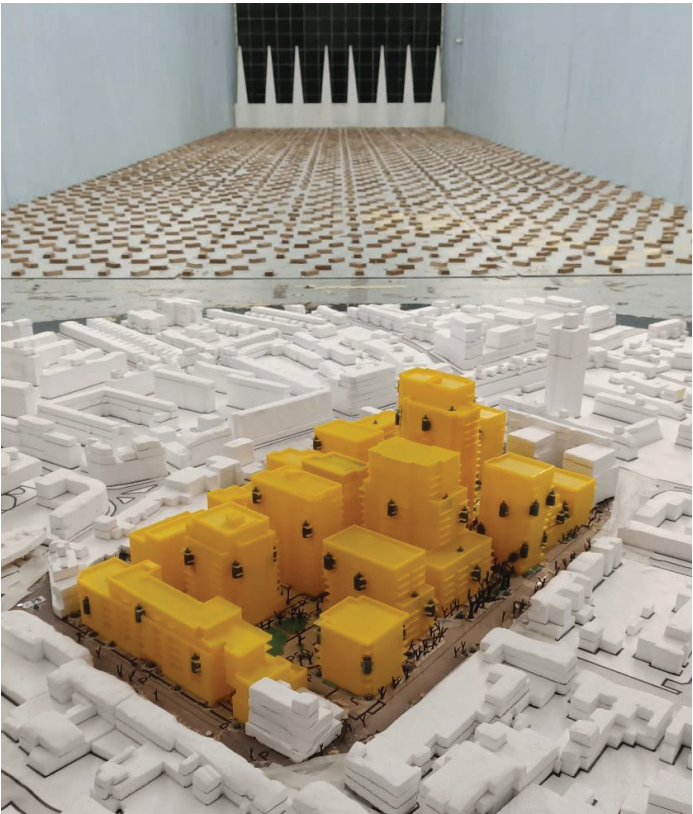
Annex 1: Wind Microclimate Assessment (December 2024)

Annex 2: Wind Microclimate CFD Study (December 2024)

Appendix: Wind Microclimate

Annex 1: Wind Microclimate Assessment (December 2024)

Annex 2: Wind Microclimate CFD Study (December 2024)



WIND MICROCLIMATE ASSESSMENT

AYLESHAM CENTRE, LONDON

WG609-01F03(REV1) – WE REPORT

DECEMBER 06, 2024

Prepared for:

Berkeley Homes (East London) Ltd

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DOCUMENT CONTROL

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December 06, 2024	Minor Text Clarifications	0	NO	NO	NO

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EXECUTIVE SUMMARY

This report presents the findings of a wind microclimate assessment of the proposed Aylesham Centre development in London. Testing was performed at Windtech’s boundary layer wind tunnel facility. The wind tunnel has a 3.0m wide working section and a fetch length of 14m, and measurements were taken from 36 wind directions at 10-degree increments. Testing was carried out using a 1:400 detailed scale model of the development, which was fabricated based on the architectural drawings received on April 5th, 2024. The effects of nearby buildings and land topography have been accounted for using a proximity model, which represents an area with a radius of 500m.

Peak gust and mean wind speeds were measured at selected critical outdoor trafficable locations around the proposed development. Wind velocity coefficients representing the local wind speeds are derived from the wind tunnel and combined with a statistical model of the regional wind climate (which accounts for the directional strength and frequency of occurrence of the prevailing regional winds) to provide the equivalent full-scale wind speeds at the site. The wind speed measurements are compared with criteria for year-round safety and seasonal comfort.

Four configurations were tested in the wind tunnel, which are as follows:

- CONFIGURATION 1: The Existing Site with Existing Surrounds (the Baseline Conditions)
- CONFIGURATION 2: Interim Phase of the Proposed Development with Existing Surrounds
- CONFIGURATION 3: Completed Proposed Development with Existing Surrounds; and
- CONFIGURATION 4: Completed Proposed Development with Existing Surrounds and Proposed Landscaping

The wind microclimate results when compared with the pedestrian comfort criteria are summarised as follows:

CONFIGURATION 1: THE EXISTING SITE WITH EXISTING SURROUNDS

SAFETY ASSESSMENT

- The existing site conditions are safe for pedestrian activities, including cyclist use throughout the year.

COMFORT ASSESSMENT

- The wind microclimate at the site and in the surrounds is suitable for intended pedestrian activities throughout the year.

CONFIGURATION 2: THE EXISTING SITE WITH INTERIM SURROUNDS

SAFETY ASSESSMENT

- The ground level wind conditions are safe for pedestrian and cyclist use throughout the year.
- At elevated levels the majority of locations, are safe for pedestrian use throughout the year.

- However, there are two locations that do exceed the safety criterion (Points P91 and 147)

COMFORT ASSESSMENT

- The wind microclimate outside all the entrances of the proposed development is suitable for ingress/egress throughout the year.
- During the summer season, the wind conditions at all the seating, outdoor amenity and play areas at the site within the surrounds are suitable for the intended use.
- Wind microclimate conditions at the podium locations (Points 75, 76, and 77) are suitable for the intended use during the summer season.
- The wind microclimate on the Podium/terraces (Points 20, 87, 88, 89, 90, 91, 92, 93, 98 and 117) exceed the comfort criterion for intended occupant use during the summer season. For these areas, additional mitigation measures (e.g. balustrades and/or soft landscaping) are recommended to provide further shelter for the intended occupant use.
- The wind microclimate conditions on balcony location Point 145 is suitable for intended occupant use during the summer season.
- The wind microclimate conditions on the balcony locations (Points 95, 96, 97, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 110, 111, 112, 114, 146, 147, 148, 149 and 150) exceed the comfort criterion for intended occupant use during the summer season.
- For these areas, additional mitigation measures (e.g. balustrades and/or side screening) are recommended to provide further shelter for the intended occupant use.
- The remaining locations within the site and surrounds are suitable for strolling throughout the year.

CONFIGURATION 3: THE COMPLETED PROPOSED DEVELOPMENT WITH EXISTING SURROUNDS

SAFETY ASSESSMENT

- The ground level wind conditions are safe for pedestrian and cyclist use throughout the year.
- At elevated levels the majority of locations, are safe for pedestrian use throughout the year.
- However, there are three locations that do exceed the safety criterion (Points P20, P102 and 143).

COMFORT ASSESSMENT

- The wind microclimate outside all entrances except 1 location within the proposed development is suitable for ingress/egress throughout the year. Point 11 represents a very marginal exceedance and with the inclusion of the existing trees and landscaping within this area, it is anticipated this will be of no concern. Therefore, no mitigation is recommended.
- During the summer season, for most areas, the wind conditions are suitable for intended usage. However, there are outdoor café and seating areas where the wind conditions exceed the appropriate target activity of frequent sitting and occasional sitting (Points 48, 49, 57, 58, 66, 67 and 69).

- The wind microclimate on the Podium/terraces (Points 4, 5, 20, 84, 86, 87, 88, 89, 90, 91, 92, 93, 98, 117 and 128) exceed the comfort criterion for intended occupant use during the summer season. For these areas, additional mitigation measures (e.g. balustrades and/or soft landscaping) are recommended to provide further shelter for the intended occupant use.
- The wind microclimate conditions on the balcony locations (Points 121,124,125,126,133, 136, 140, 142, 144 and 145), is suitable for intended occupant use during the summer season.
- The wind microclimate conditions on the balcony locations (Points 94, 95, 96, 97, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 110, 111, 112, 113, 114, 115, 116, 119, 120, 122, 123, 127, 128, 129, 130, 131, 132, 134, 135, 137, 138, 139, 141, 143, 146, 147, 148, 149, 150) exceed the comfort criterion for intended occupant use during the summer season.
- The remaining locations within the site and surrounds are suitable for strolling throughout the year.

CONFIGURATION 4: THE PROPOSED SCHEME WITH EXISTING SURROUNDS

SAFETY ASSESSMENT

- The ground level wind conditions are safe for pedestrian and cyclist use throughout the year.
- At elevated levels, the majority of locations, are safe for pedestrian use throughout the year.
- However, two locations do exceed the safety criterion (Points P102 and 143).

COMFORT ASSESSMENT

- The wind microclimate outside all entrances except 2 locations within the proposed development is suitable for ingress/egress throughout the year. Points 38 and 53 represent a marginal exceedance and with the inclusion of further local landscaping within this area, it is anticipated this will be of no concern.
- During the summer season, for most areas, the wind conditions are suitable for intended usage. However, there are outdoor café and seating areas where the wind conditions exceed the appropriate target activity of frequent sitting and occasional sitting (Points 48, 49, 57, 58, 66 and 69).
- The wind microclimate on the Podium/terraces (Points 4, 5, 20, 84, 86, 87, 89, 90, 91, 98, 117 and 128) exceed the comfort criterion for intended occupant use during the summer season. For these areas, additional mitigation measures (e.g. balustrades and/or soft landscaping) are recommended to provide further shelter for the intended occupant use.
- The wind microclimate conditions on the balcony locations (Points 111, 114, 121,124, 126,128, 133, 136, 140, 142, 144, 145 and 147), is suitable for intended occupant use during the summer season.
- The wind microclimate conditions on the balcony locations (Points 94, 95, 96, 97, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 110, 112, 113, 115, 116, 119, 120, 122, 123, 125, 127, 129, 130, 131, 132, 134, 135, 137, 138, 139, 141, 143, 146, 148, 149, 150) exceed the comfort criterion for intended occupant use during the summer season.
- The remaining locations within the site and surrounds are suitable for strolling throughout the year.

SUMMARY AND RECOMMENDATIONS

Based on the currently tested configurations and mitigation measures included, there remain some areas of adverse wind safety and comfort conditions on-site. As such, additional onsite mitigation measures have been coordinated with the design team to provide suitable design where wind conditions in the remaining locations which are unsuitable for the intended use.

It is anticipated by the inclusion of these additional mitigation measures into the final design, all areas of the development will be safe and fit for intended usage.

It is recommended the efficacy of these measures is test prior to occupation with further CFD testing.

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1 INTRODUCTION

A wind tunnel study has been undertaken to assess the wind microclimate around the proposed development. The test procedures followed for this wind tunnel study were based on the Wind Microclimate Guidelines for Developments in the City of London and the guidelines set out in the Australasian Wind Engineering Society Quality Assurance Manual (AWES-QAM-1-2019), ASCE 7-16 (Chapter C31), and CTBUH (2013).

A scale model of the development was prepared, including the surrounding buildings and land topography. Testing was performed at Windtech’s boundary layer wind tunnel facility. The wind tunnel has a 3.0m wide working section and a fetch length of 14m, and measurements were taken from 36 wind directions at 10-degree increments. The wind tunnel was configured to the appropriate boundary layer wind profile for each wind direction. Wind speeds were measured using pressure-based wind speed sensors, positioned to monitor wind conditions at critical outdoor trafficable areas of the development.

The wind speeds measured during testing were combined with a statistical model of the regional wind climate to provide the equivalent full-scale wind speeds at the site. The wind speed measurements are compared with criteria for pedestrian comfort and safety, based on criteria for year-round safety and seasonal comfort.

2 WIND TUNNEL MODEL

Wind tunnel testing was carried out using a 1:400 scale model of the development and surroundings. The study model incorporates all necessary architectural features on the façade of the development to ensure an accurate wind flow is achieved around the model and was constructed using a Computer Aided Manufacturing (CAM) process to ensure that a high level of detail and accuracy is achieved. The study model was fabricated based on the architectural drawings received on April 5th, 2024. The effect of nearby buildings and land topography has been accounted for with a proximity model, which represents an area with a radius of 500m.

Four configurations were tested in the wind tunnel, which are as follows:

- CONFIGURATION 1: The Existing Site with Existing Surrounds (the Baseline Conditions)
- CONFIGURATION 2: Interim Phase of the Proposed Development with Existing Surrounds
- CONFIGURATION 3: Completed Proposed Development with Existing Surrounds; and
- CONFIGURATION 4: Completed Proposed Development with Existing Surrounds and Proposed Landscaping

Photographs of the wind tunnel model are presented in Figures 1. Plan views of the model are provided in Figures 2.



Figure 1a: Photograph of the Wind Tunnel Model: The Existing Site with Existing Surrounds (view from North)



Figure 1b: Photograph of the Wind Tunnel Model: Interim Phase of the Proposed Development with Existing Surrounds (view from North)



Figure 1c: Photograph of the Wind Tunnel Model: Completed Proposed Development with Existing Surrounds (view from North)



Figure 2a: Plan View – (CONFIGURATION 1) The Existing Site with Existing Surrounds



Figure 2b: Plan View – (CONFIGURATION 2) Interim Phase of the Proposed Development with Existing Surrounds



Figure 2c: Plan View – (CONFIGURATION 3) Completed Proposed Development with Existing Surrounds



Figure 2d: Plan View – (CONFIGURATION 4) Completed Proposed Development with Existing Surrounds and Proposed Landscaping

3

BOUNDARY LAYER WIND PROFILES AT THE SITE

The roughness of the surface of the earth has the effect of slowing down the wind near the ground. This effect is observed up to the boundary layer height, which can range between 500m to 3km above the earth's surface depending on the roughness of the surface (i.e.: oceans, open farmland, etc). Within this range the prevailing wind forms a boundary layer wind profile. Various wind codes and standards and other publications classify various types of boundary layer wind flows depending on the surface roughness z_0 . Descriptions of typical boundary layer wind profiles, based on D.M. Deaves and R.I. Harris (1978), are summarised as follows:

- Flat terrain ($0.002\text{m} < z_0 < 0.003\text{m}$). Examples include inland water bodies such as lakes, dams, rivers, etc, and the open ocean.
- Semi-open terrain ($0.006\text{m} < z_0 < 0.01\text{m}$). Examples include flat deserts and plains.
- Open terrain ($0.02\text{m} < z_0 < 0.03\text{m}$). Examples include grassy fields, semi-flat plains, and open farmland (without buildings or trees).
- Semi-suburban/semi-forest terrain ($0.06\text{m} < z_0 < 0.1\text{m}$). Examples include farmland with scattered trees and buildings and very low-density suburban areas.
- Suburban/forest terrain ($0.2\text{m} < z_0 < 0.3\text{m}$). Examples include suburban areas of towns and areas with dense vegetation such as forests, bushland, etc.
- Semi-urban terrain ($0.6\text{m} < z_0 < 1.0\text{m}$). Examples include centres of small cities, industrial parks, etc.
- Urban terrain ($2.0\text{m} < z_0 < 3.0\text{m}$). Examples include centres of large cities with many high-rise towers, and areas with many closely spaced mid-rise buildings.

The boundary layer wind profile does not change instantly due to changes in the terrain roughness. It can take many kilometres (at least 100km) of a constant surface roughness for the boundary layer wind profile to achieve a state of equilibrium. Hence an analysis of the effect of changes in the upwind terrain roughness is necessary to determine an accurate boundary layer wind profile at the development site location.

The method from EN1991-1-4:2005 to account for changes in the upwind terrain roughness is overly simplistic. Hence an assessment of the upwind terrain roughness has been undertaken based on the far more detailed (and accurate) method given in ESDU-82026:2002. Aerial images showing the surrounding terrain are presented in Figures 3 for ranges of 5km and 50km from the edge of the proximity model used for the wind tunnel study. The resulting roughness factors and turbulence intensities at the site location are presented in Table 1, referenced to the study reference height of 34.1m (which is approximately half the average height of the proposed development, since typically we are most interested in the wind effects at the ground plane). Details of the boundary layer wind profiles at the site are combined with the regional wind model (see Section 4) to determine the site wind speeds.

Table 1: Approaching Boundary Layer Wind Profile Analysis Summary (at the study reference height)

Wind Sector (degrees)	Terrain and Height Multiplier			Turbulence Intensity I_v	Equivalent Terrain Category (EN1991-1-4:2005 naming convention)
	$k_{tr,T=1hr}$ (hourly)	$k_{tr,T=10min}$ (10min)	$k_{tr,T=3s}$ (3sec)		
0	0.56	0.60	1.00	0.260	III.5
20	0.59	0.63	1.02	0.247	III
30	0.61	0.65	1.03	0.233	III
40	0.63	0.67	1.05	0.220	III
50	0.62	0.66	1.05	0.225	III
60	0.62	0.66	1.04	0.230	III
70	0.61	0.65	1.03	0.235	III
80	0.62	0.66	1.04	0.230	III
90	0.63	0.66	1.05	0.225	III
100	0.63	0.67	1.05	0.220	III
110	0.64	0.68	1.06	0.217	III
120	0.65	0.68	1.06	0.215	III
130	0.65	0.69	1.07	0.212	III
140	0.65	0.69	1.07	0.212	III
150	0.66	0.69	1.07	0.211	III
160	0.66	0.70	1.07	0.210	III
170	0.65	0.69	1.07	0.211	III
180	0.65	0.69	1.06	0.213	III
190	0.65	0.68	1.06	0.215	III
200	0.65	0.68	1.06	0.215	III
210	0.65	0.68	1.06	0.215	III
220	0.65	0.69	1.06	0.215	III
230	0.64	0.68	1.06	0.217	III
240	0.64	0.68	1.06	0.218	III
250	0.63	0.67	1.05	0.220	III
260	0.63	0.67	1.05	0.221	III
270	0.63	0.67	1.05	0.222	III
280	0.63	0.67	1.05	0.223	III
290	0.63	0.67	1.05	0.223	III
300	0.63	0.67	1.05	0.223	III
310	0.63	0.67	1.05	0.224	III
320	0.62	0.66	1.04	0.229	III

Wind Sector (degrees)	Terrain and Height Multiplier			Turbulence Intensity I_v	Equivalent Terrain Category (EN1991-1-4:2005 naming convention)
	$k_{tr,T=1hr}$ (hourly)	$k_{tr,T=10min}$ (10min)	$k_{tr,T=3s}$ (3sec)		
330	0.61	0.64	1.04	0.238	III
340	0.60	0.63	1.03	0.245	III
350	0.59	0.62	1.02	0.253	III

NOTE: These terrain and height multipliers are to be applied to a basic regional wind speed averaged over 3-seconds. Divide these values by 1.10 for a basic wind speed averaged over 0.2-seconds, 0.69 for a basic wind speed averaged over 10-minutes, or 0.66 for a basic wind speed averaged over 1-hour.

For each of the 36 wind directions tested in this study, the approaching boundary layer wind profiles modelled in the wind tunnel closely matched the profiles listed in Table 1. Plots of the boundary layer wind profiles used for the wind tunnel testing are presented in Appendix C of this report.

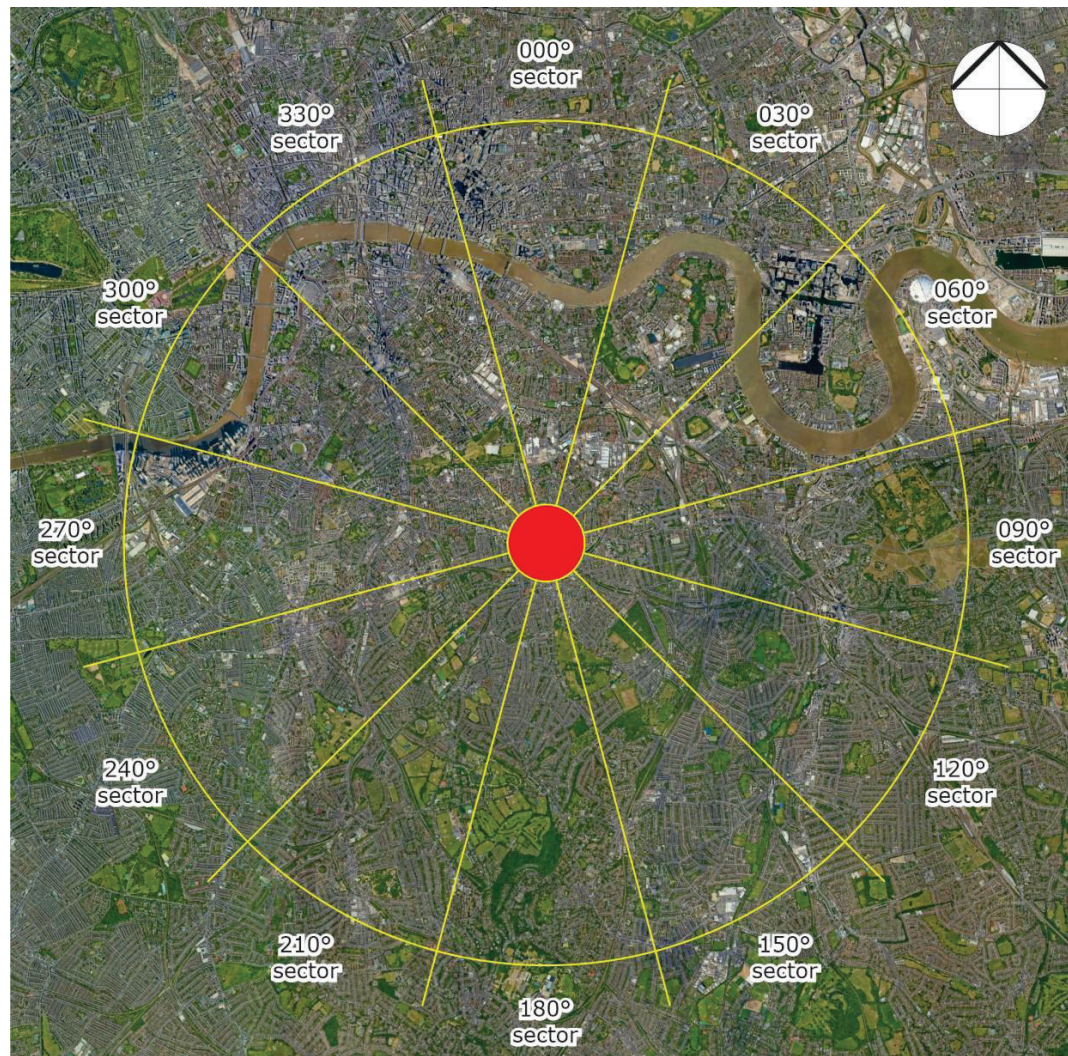


Figure 4a: Aerial Image of the Surrounding Terrain (radius of 5km from the edge of the proximity model)

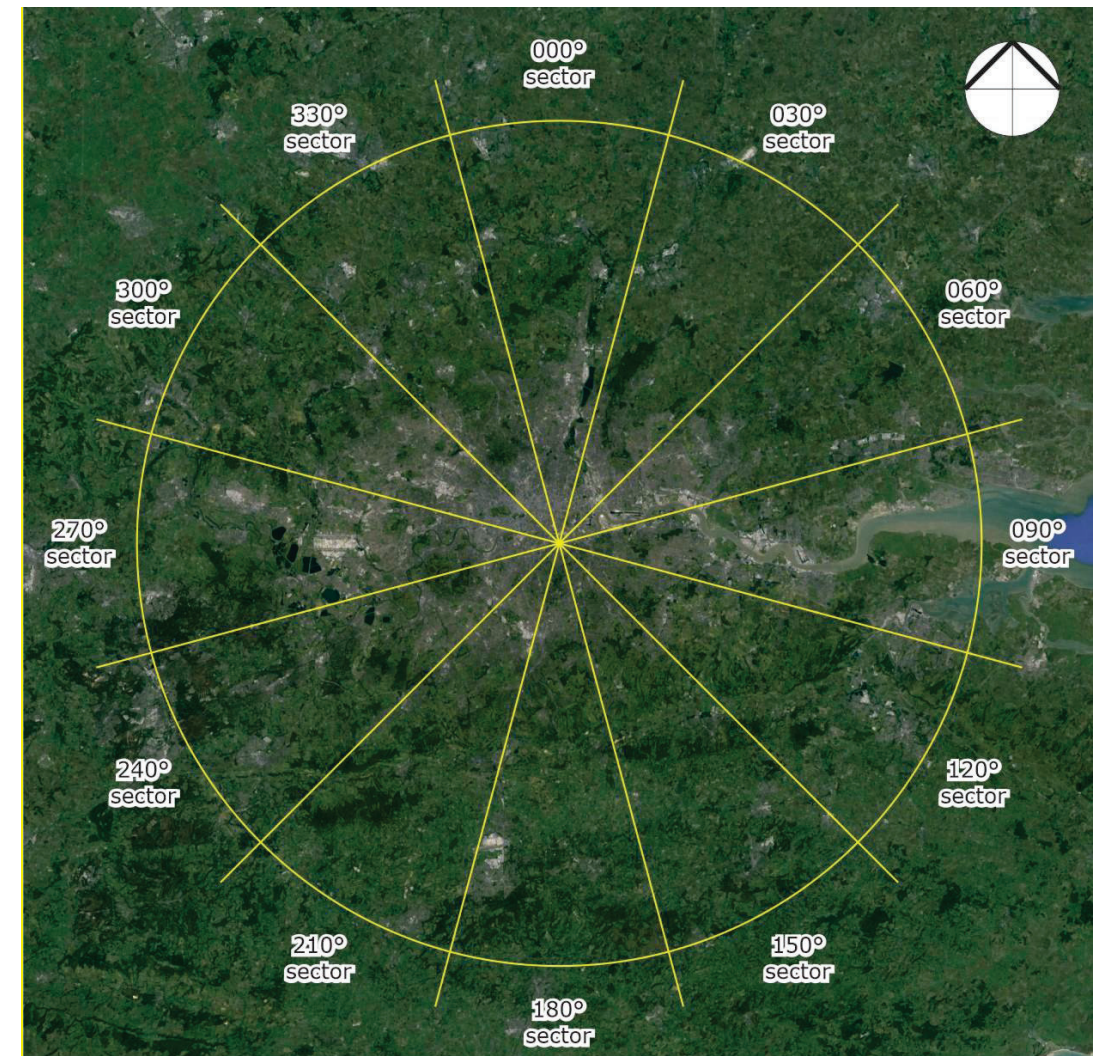


Figure 4b: Aerial Image of the Surrounding Terrain (radius of 50km)

REGIONAL WIND MODEL

The regional wind model used in this study was determined from an analysis of measured directional mean wind speeds obtained at meteorological stations located at Heathrow, Gatwick, and Stansted Airports. A total of 136 years of wind climate data has been collected from these stations and the data has been corrected so that it represents winds over standard open terrain at a height of 10m above ground. From this analysis, directional probabilities of exceedance and directional wind speeds for the region are determined. The directional wind speeds are summarised in Table 2. The directional wind speeds and corresponding directional frequencies of occurrence are presented in Figures 4. Note that the regional wind climate has been examined for the year as well as for the summer and winter seasons.

The analysis indicates that the strongest and most frequent winds occur from the south-western quadrant.

Table 2: Regional 5% Exceedance Directional Wind Speeds
(hourly means, at 10m height in standard open terrain) (m/s)

Wind Direction	All Year	Summer	Winter
N	5.9	5.6	5.5
NNE	6.2	5.6	5.6
NE	6.5	5.8	6.4
ENE	6.1	5.6	6.4
E	5.5	5.3	5.7
ESE	4.8	4.7	4.9
SE	4.6	4.1	4.8
SSE	5.1	4.0	5.9
S	6.9	5.7	8.0
SSW	8.3	7.5	9.3
SW	8.9	8.1	9.8
WSW	8.2	7.2	9.2
W	7.6	6.9	8.7
WNW	6.5	6.2	7.1
NW	6.0	5.8	6.3
NNW	5.8	5.4	5.7

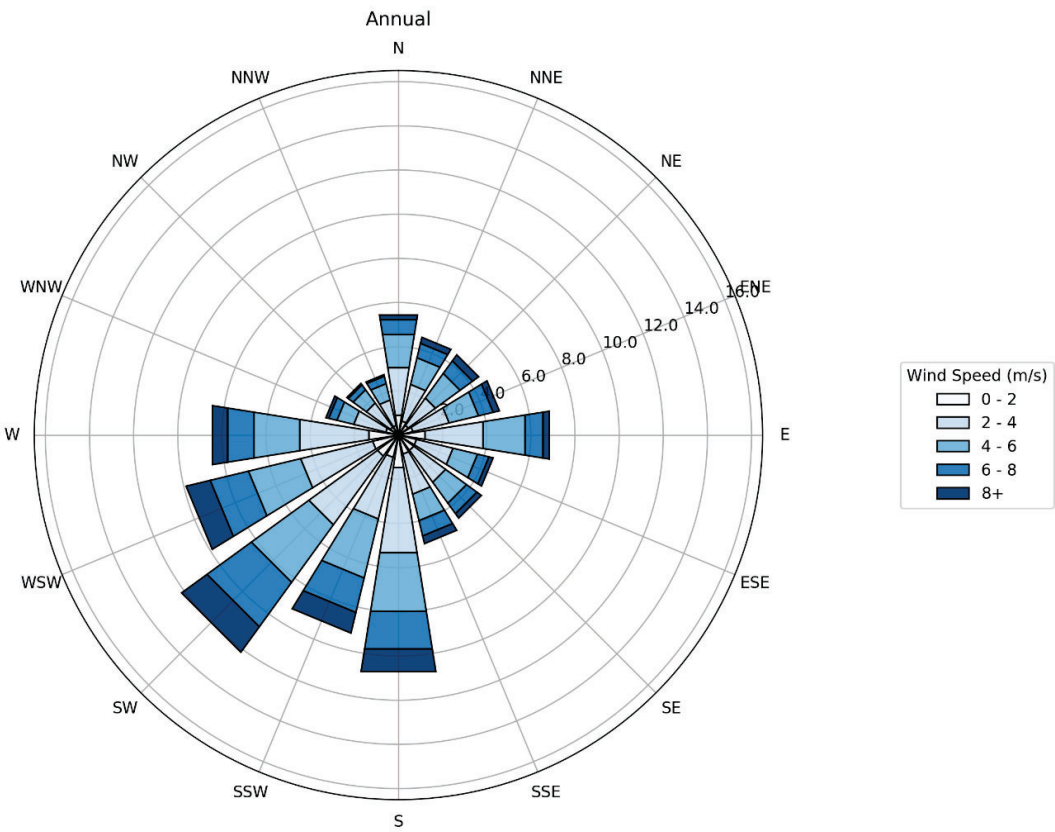


Figure 4a: Hourly Mean Wind Speeds (referenced to 10m height in standard open terrain) and Frequencies of Occurrence for London (all-year)

The acceptability of wind conditions for an area is determined by comparing the measured wind speeds against an appropriate criterion. This section outlines how the measured wind speeds were obtained, the criteria considered for the development, as well as the critical trafficable areas that were assessed and their corresponding criteria designation.

5.1 Measured Wind Speeds

Wind speeds were measured using pressure-based wind speed sensors, positioned to monitor wind conditions at critical outdoor trafficable areas of the development. The reference mean free-stream wind speed measured in the wind tunnel, which is at a full-scale height of 200m and measured 3m upstream of the study model.

Measurements were acquired for 36 wind directions at 10-degree increments using a sample rate of 1,024Hz. The full methodology of determining the wind speed measurements at the site from pressure-based wind speed sensors is provided in Appendix B. Based on the results of the analysis of the boundary layer wind profiles at the site (see Section 3), and incorporating the regional wind model (see Section 4), the data sampling length of the wind tunnel test for each wind direction corresponds to a full-scale sample length ranging between 30 minutes and 1 hour. Research by A.W. Rofail and K.C.S. Kwok (1991) has shown that, in addition to the mean and standard deviation of the wind being stable for sample lengths of 15 minutes or more (full-scale), the peak value determined using the upcrossing method is stable for sample lengths of 30 minutes or more.

5.2 Wind Speed Criteria Used for This Study

For this study the measured wind conditions of the selected critical outdoor trafficable areas are compared against the City of London Lawson Criteria, which is referred to as the City Lawson Criteria. The criteria are described within the Birmingham Design Guide "Healthy Living and Working Places City Manual" and the "Wind Microclimate Guidelines for Developments in the City of London". The criteria are applied to Gust Equivalent Mean (GEM) winds. In accordance with ASCE (2003), the GEM wind speed is defined as follows:

$$GEM = \max\left(\bar{V}, \frac{\hat{V}}{1.85}\right) \quad (5.1)$$

where:

$\bar{V}$ is the mean wind speed.

$\hat{V}$ is the 3-second gust wind speed.

For pedestrian safety, the safety limit criterion of 15m/s applies to the year-round GEM winds with a probability of exceedance of less than 0.022%. For pedestrian comfort, the comfort criteria are used in conjunction with the seasonal GEM wind speeds with a probability of exceedance of less than 5%.

The criteria for pedestrian comfort and safety which are applied to this study are summarised in Tables 3 and 4, respectively.

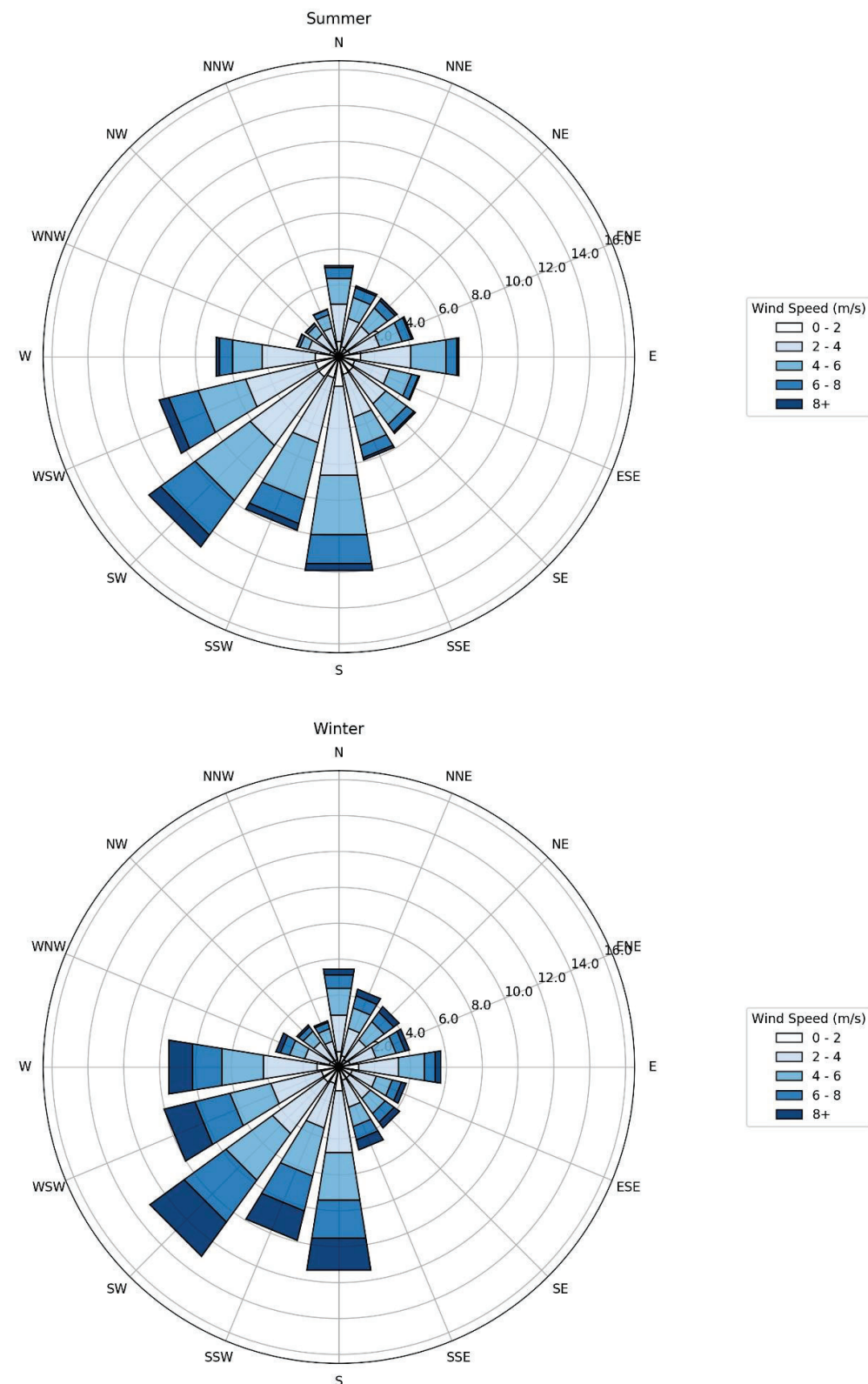


Figure 4b: Hourly Mean Wind Speeds (referenced to 10m height in standard open terrain) and Frequencies of Occurrence for London (summer top, winter bottom)

Table 3: City Lawson Criteria – Comfort

Classification	Activities	Mean and GEM Wind Speed (5% Exceedance) m/s
Frequent Sitting	Acceptable for frequent outdoor sitting use, e.g., restaurant, café.	2.5
Occasional Sitting	Acceptable for occasional outdoor seating, e.g., general public outdoor spaces, balconies and terraces intended for occasional use, etc.	4.0
Standing	Acceptable for entrances, bus stops, covered walkways, or passageways beneath buildings.	6.0
Walking	Acceptance for external pavements, walkways.	8.0
Uncomfortable	No comfortable for regular pedestrian access.	> 10.0

Table 4: City Lawson Criteria – Safety

Classification	Activities	Mean and GEM Wind Speed (0.022% Exceedance) m/s
Pedestrian Safety Limit	Presents a safety risk for pedestrians, especially to more vulnerable members of the public.	15

5.3 Layout of Study Points

The locations of the various study points tested for this study, as well as the target wind speed criteria for the various outdoor trafficable areas of the development, are presented in Figures 5 in the form of marked-up plans. It should be noted that only the most critical outdoor locations of the development have been selected for analysis.

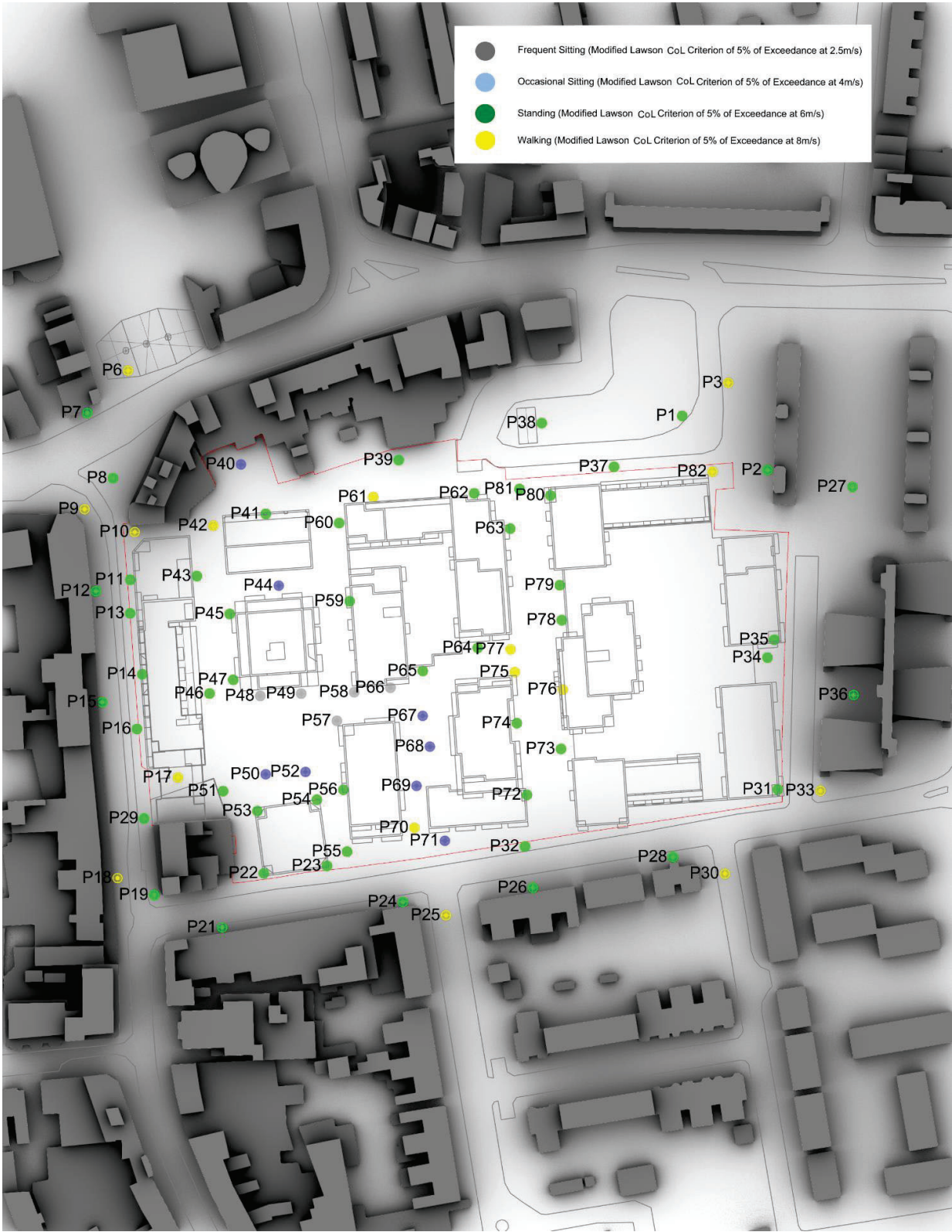


Figure 5a: Study Point Locations and Target Wind Speed Criteria – (Configuration 3) Completed Proposed Development with Existing Surrounds – Ground Level



Figure 5b: Study Point Locations and Target Wind Speed - (Configuration 3) Completed Proposed Development with Existing Surrounds – Elevated Amenity

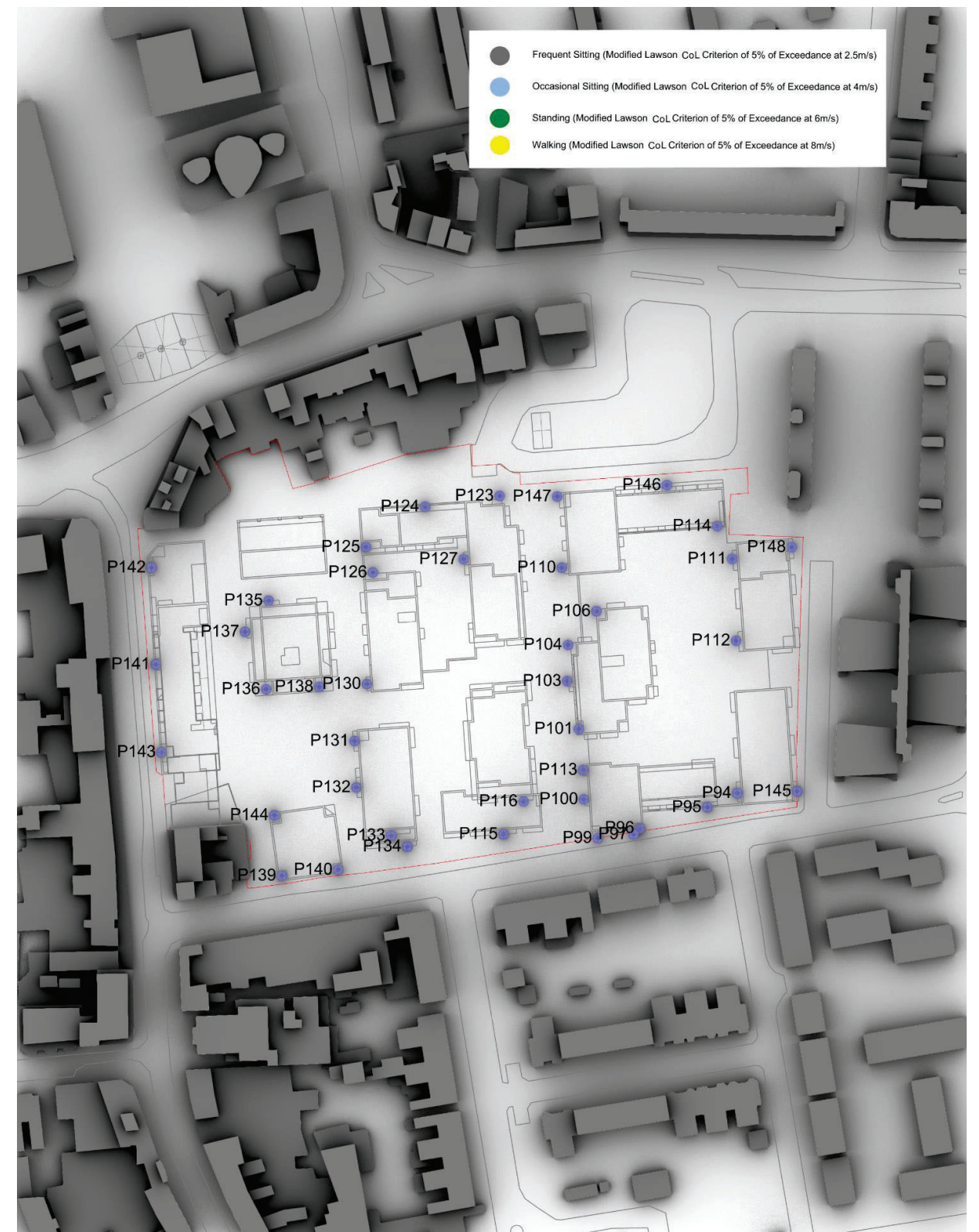


Figure 5c: Study Point Locations and Target Wind Speed Criteria - (Configuration 3) Completed Proposed Development with Existing Surrounds – Elevated Balcony Low

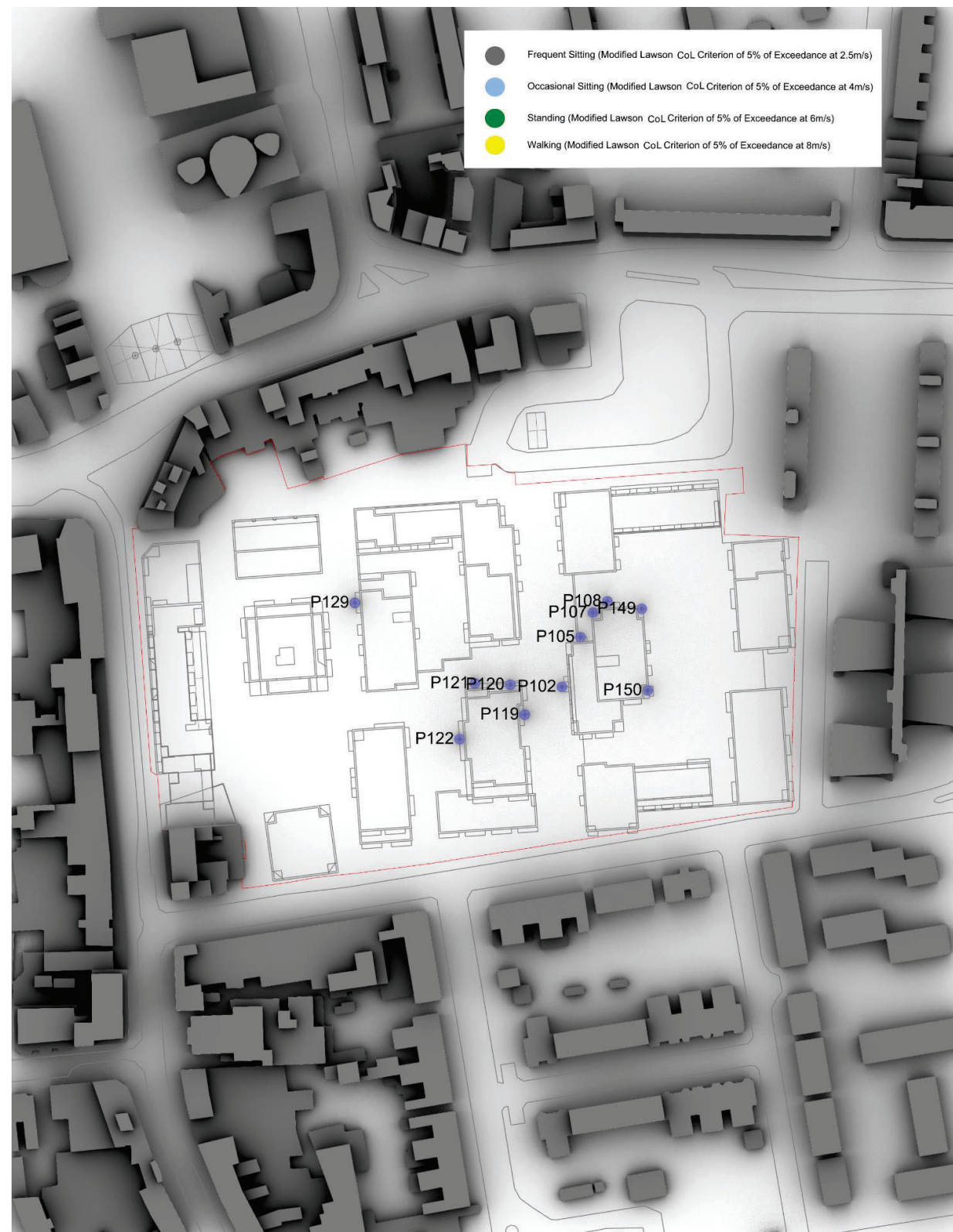


Figure 5d: Study Point Locations and Target Wind Speed Criteria - (Configuration 3) Completed Proposed Development with Existing Surrounds – Elevated Balcony Top

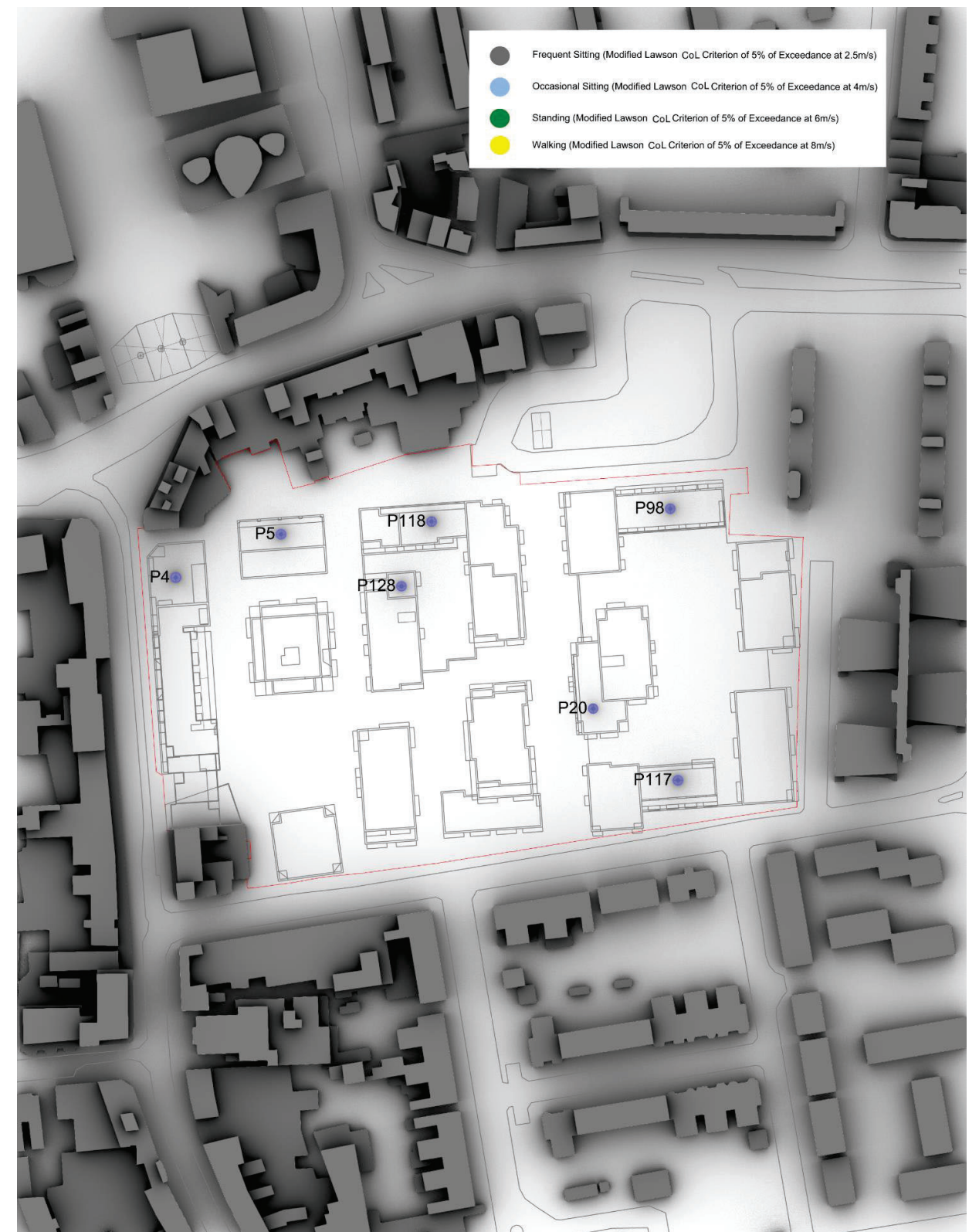


Figure 5e: Study Point Locations and Target Wind Speed Criteria - (Configuration 3) Completed Proposed Development with Existing Surrounds – Elevated Terraces Top

5.4 Tested Mitigation Measures

The tested landscaping and wind mitigation measures included during current wind tunnel testing for Configuration 4 are displayed in the following Figures 5f-5i.

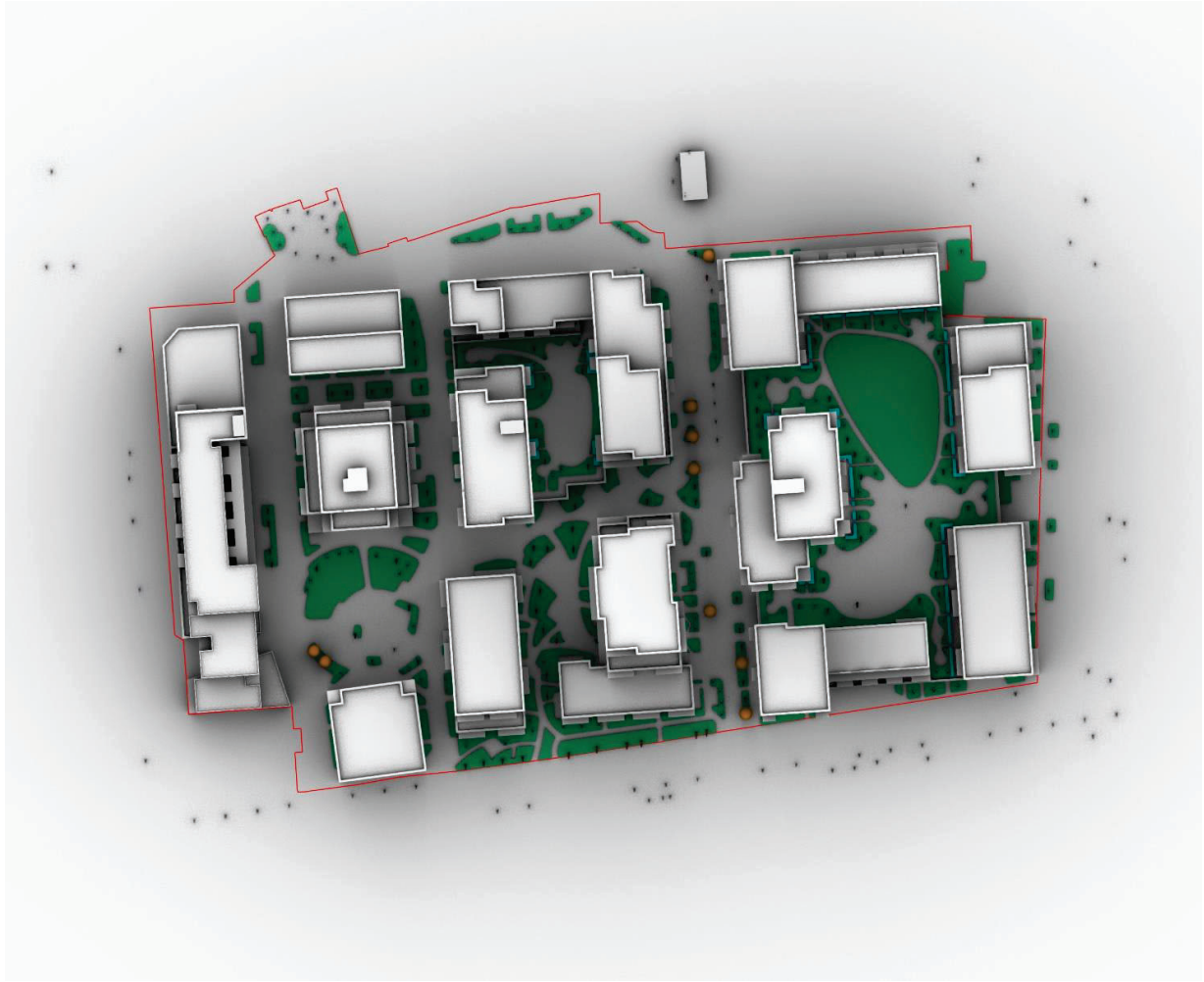
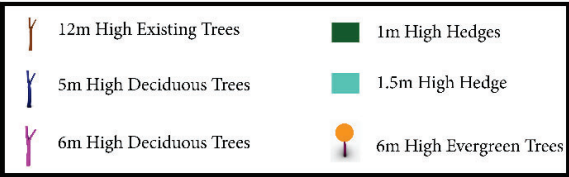


Figure 5f: Mitigation Measures Tested – (CONFIGURATION 4) Completed Proposed Development with Existing Surrounds and Proposed Landscaping - Plan View

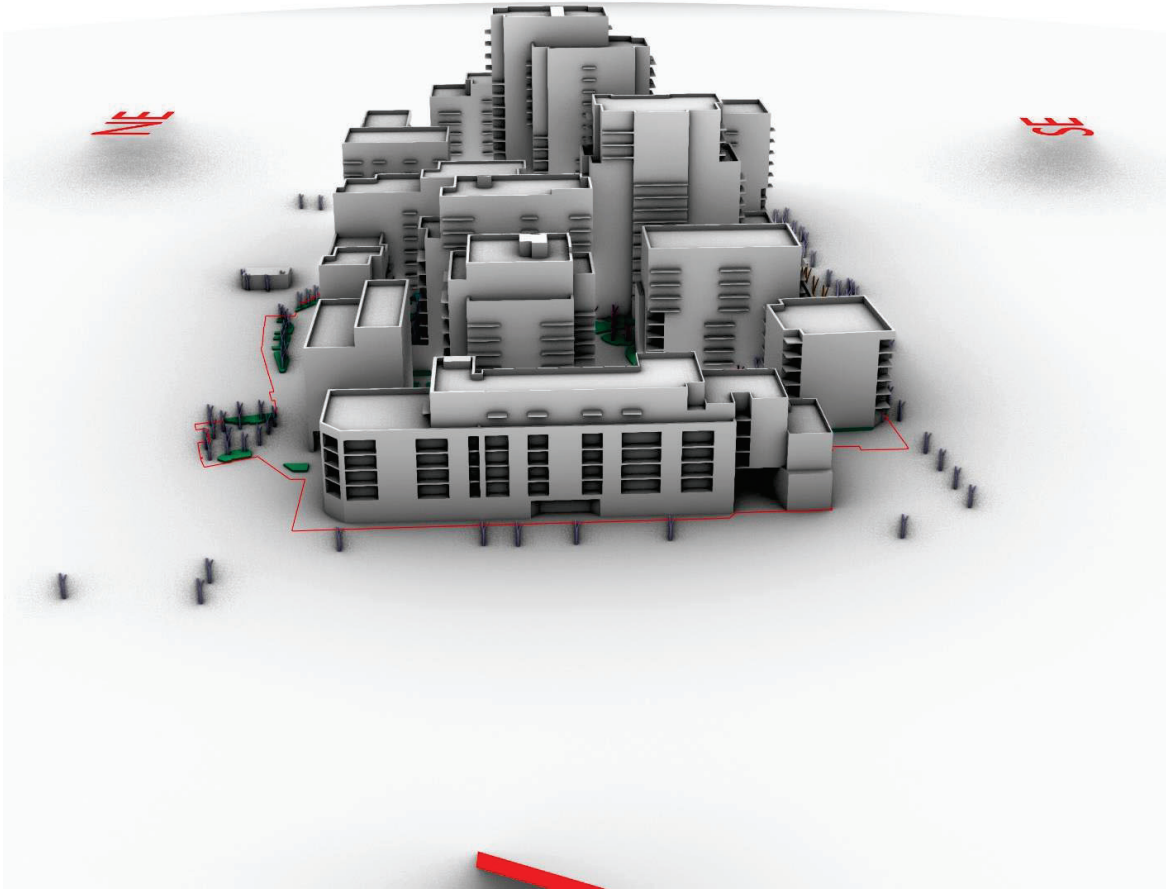
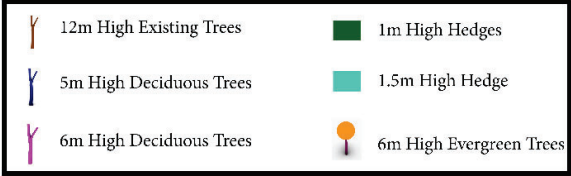


Figure 5g: Mitigation Measures Tested – (CONFIGURATION 4) Completed Proposed Development with Existing Surrounds and Proposed Landscaping – 3D East Aspect