

Aylesham Centre

Environmental Statement (ES) Addendum

Volume 1: Main Report

Document Ref. AC18A

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Chapter 1: Introduction, ES Addendum Approach and Proposed Amendments

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Introduction

- 1.1 In July 2024, Berkeley Homes (Capital) Plc (the ‘Applicant’) submitted a full (detailed) planning application (planning reference: 24/AP/2074) to the London Borough of Southwark (‘LBS’) for the redevelopment of a 2.7 hectare site into a mixed-use residential scheme comprising the demolition of existing buildings, construction of 16 buildings, a replacement supermarket flexible retail and leisure including drinking establishment. An Environmental Statement (ES) was submitted to accompany the Planning Application (hereafter referred to as the ‘July 2024 ES’).
- 1.2 The Planning Application for the Proposed Development, which was the subject of the July 2024 ES, was for:
“Demolition of existing buildings and phased redevelopment to provide a replacement supermarket and associated service yard and car parking (Use Class E(a)); flexible retail, leisure (including drinking establishment), and commercial accommodation (Use Class E / Sui Generis); dwellings (use Class C3); landscaping and associated works.”
- 1.3 Following validation of the planning application, the Applicant has considered responses received from LBS officers (and their independent advisors), statutory consultees, the public, and other stakeholders. A further review of the financial viability of the proposals has also been undertaken. This has identified a need to make alterations to the planning application. The full list of the alterations relevant to the ES, (referred to as the ‘Proposed Amendments’) is set out within the ‘Revised Proposed Development’ section below.
- 1.4 This December 2024 ES Addendum has been undertaken in accordance with the statutory procedures set out in The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as amended¹ (‘the EIA Regulations’) and should be read in conjunction with the original July 2024 ES.
- 1.5 This introductory document to the December 2024 ES Addendum sets out the following information:
- Approach to the ES Addendum;
 - Design Evolution of the Proposed Amendments;
 - The Revised Proposed Development;
 - Demolition and Construction of the Revised Proposed Development;
 - Changes to the July 2024 Environmental Statement; and
 - Structure of the December 2024 ES Addendum.
- 1.6 A table summarising the key terms and documents which have been referenced throughout this document is provided below:

Table 1.1 Key Terms / Documents

Key Term / Document	Definition
July 2024 Proposed Development	The scheme submitted, as detailed within the July 2024 ES (submitted under Planning Application Reference: 24/AP/2074). <i>“Demolition of existing buildings and phased redevelopment to provide a replacement supermarket and associated service yard and car parking (Use Class E(a)); flexible retail, leisure (including drinking establishment), and commercial accommodation (Use Class E / Sui Generis); dwellings (use Class C3); landscaping and associated works.”</i>
EIA Scoping Opinion	A formal document received from LBS (issued 27 th March 2024) on their decision to the approach outlined within the EIA Scoping Opinion Request Report (24/AP/0111) submitted by the Applicant’s EIA Team in January 2024.

Key Term / Document	Definition
July 2024 ES	The planning application for the scheme submitted in July 2024 was accompanied by an Environmental Statement (ES) (dated July 2024) (herein referred to as the July 2024 ES).
ES Review Report	A review undertaken by Land Use Consultants (LUC), the 3 rd party reviewer for the LBS, of the submitted July 2024 ES, dated 11 th October 2024.
Proposed Amendments	The December 2024 design changes to the July 2024 Proposed Development (submitted under Planning Application Reference: 24/AP/2074).
Revised Proposed Development	The development which considers the details of the July 2024 Proposed Development and the Proposed Amendments in combination. The Revised Proposed Development reflects the development being sought for planning approval and which is the subject of this ES Addendum.
December 2024 ES Addendum	An Addendum to the July 2024 ES that includes such information that is reasonably required to assess the Proposed Amendments to the scheme and determine any change to environmental and socio-economic effects previously presented.
The Site	The area / location within the planning application boundary as presented within the July 2024 ES, which also applies to the Revised Proposed Development and this December 2024 ES Addendum.

APPROACH TO THE ES ADDENDUM

- 1.7 This December 2024 ES Addendum describes the Proposed Amendments and builds on the analysis and assessments presented in the July 2024 ES to assess the likely significant effects of the Revised Proposed Development as a whole. Any changes to the conclusions of the July 2024 ES are identified. This ES Addendum should be read in conjunction with the July 2024 ES. Any aspects of the July 2024 ES that are not addressed in this December 2024 ES Addendum, remain valid.
- 1.8 An ES Review was received from the LBS on 11th October 2024 (provided in **Environmental Statement Addendum December 2024 Volume 3, Appendix: Main Report – Annex 3**) highlighting the clarifications required relating to the July 2024 ES. This December 2024 ES Addendum also seeks to respond appropriately to these clarification requests. Clarifications and further information for the technical topics have been addressed within the relevant chapters of this December 2024 ES Addendum. Clarifications referring to Chapter 5: Demolition and Construction have been addressed within the below table.

Table 1.2 Responses to the ES Review Report for Non-Technical Chapters

Chapter Reference	Clarification Listed Within the ES Review Report	Response
Chapter 5: Demolition and Construction	Clarification Point (DC1) Clarification as to whether an Outline DCEMP will be made available to review	An Outline DCEMP was prepared by Berkeley Homes and was submitted in support of the planning application. The Outline DCEMP is available to view via the LBS Planning Portal.
	Clarification Point (DC3) Clarification as to whether phased receptors have been considered within the ES chapters	Yes, Phasing has been considered throughout the July 2024 ES where appropriate within the technical topics (Socio-Economics, Traffic and Transport, Air Quality, Noise and Vibration, Wind Microclimate)
	Clarification Point (DC4) Clarification as to whether a Construction Logistics Plan will be made available to review	The Applicant prepared a draft outline CLP, although this was not submitted with the planning application. The relevant information (such as indicative Logistics Plans) was replicated within ES Chapter 5 of the July 2024 ES. A CLP is not a validation requirement and absence of the draft CLP within the planning application does not result in a deficient ES. The principal contractor will prepare the Construction Logistics Plan prior

¹ Statutory Instruments, 2017, No. 571, Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as Amended

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Chapter Reference	Clarification Listed Within the ES Review Report	Response
		to the demolition and construction site works commencing, which will provide confirmation on the management strategy to be used to minimise the impact of the works. This will be secured by way of a planning condition and agreed with LBS prior to the commencement of works.
	Clarification Point (DC6) Clarification whether WRAP's Net Waste Tool was employed to calculate predicted waste volumes	The waste arisings for the residential waste are based on the method provided by the council. Whereas the commercial waste is calculated using British standards. This is in line with the guidance provided by the council.
	Clarification Point (DC8) Clarification of DMP parameters and agreed actions should the parameters be breached	Prior to construction, the Final DCEMP will include 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. This information will likely comprise the monitoring strategy, i.e., number of units to be used, locations, Site Action Levels (SALs) and actions to be taken in case of an exceedance of the SALs. The contents of the DCEMP and DMP will be agreed and actioned as a planning condition.
	Potential Regulation 25 Point (DC7) As Waste is scoped out of the ES the Project Waste Management Plan should be included within the ES appendices	The Berkeley Homes Outline DCEMP (that was prepared to accompany the planning application) identified that a prior to any works beginning, a Project Waste Management Plan will be drafted. The plan will include details on waste minimisation strategies incorporated in design and procurement stages. It will also include information on how waste will be managed during the construction phase along with predictions for various waste streams. The Outline DCEMP includes some measure of how waste will be managed during the construction process, which will be further developed in the form of a Project Waste Management Plan once further detail is known prior to construction commencing. Sufficient detail has been provided in order to inform the EIA and the planning application, in the form of the Outline DCEMP, Outline CLP, Demolition and Construction ES Chapter. It is unnecessary (and disproportionate) to replicate the measures already outlined in these documents in the form of a framework Project Waste Management Plan, when the commitment has been made to produce a detailed Project Waste Management Plan when further detail is known prior to construction. Further to this, the LBS Validation list and Scoping Opinion did not request that a framework Project Waste Management Plan to be submitted with the planning application.

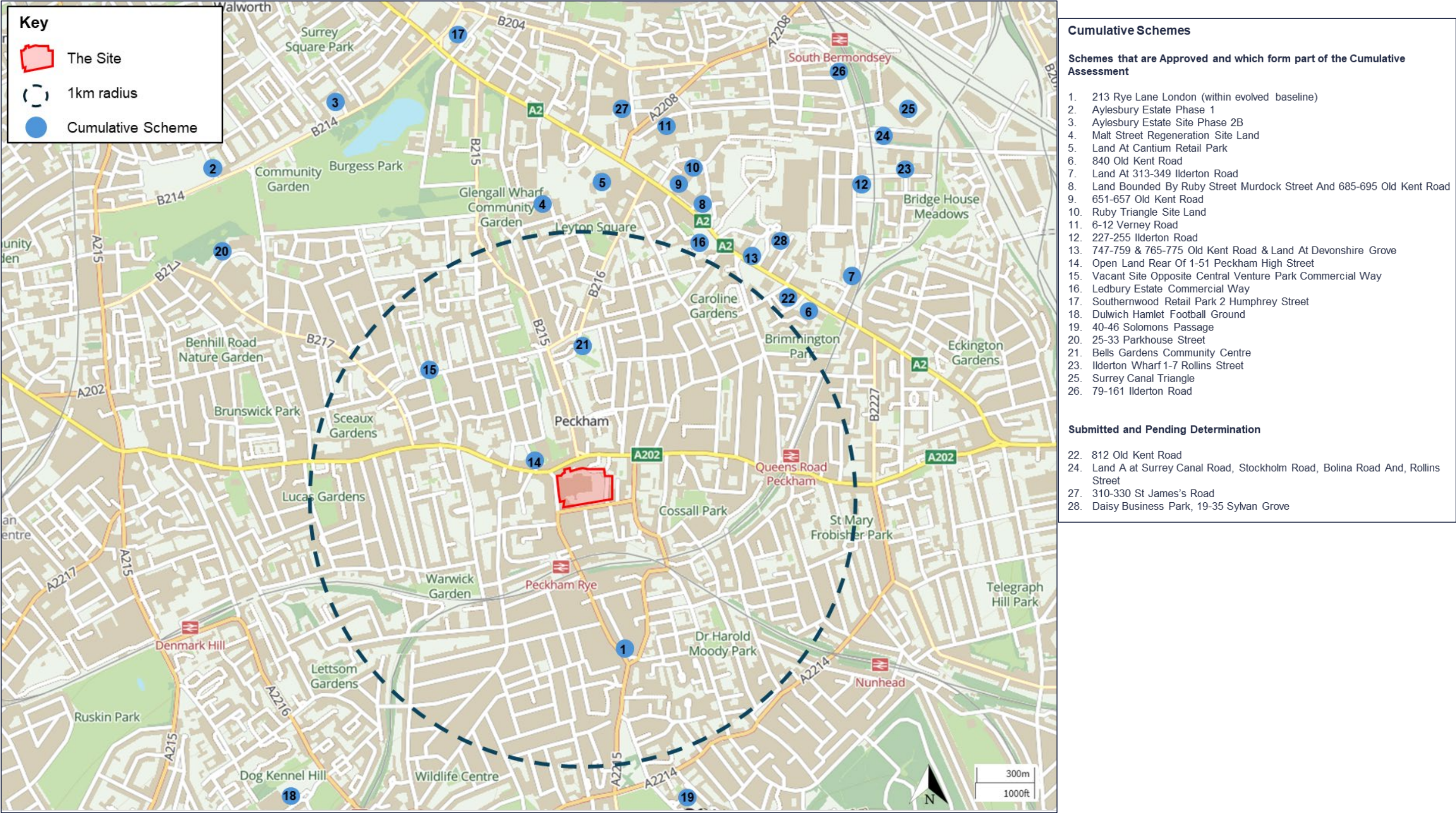
- 1.9 For continuity, the technical sections within this ES Addendum follow the same structure and format as presented within the July 2024 ES, with the same chapter volume and technical chapter numbers used throughout.
- 1.10 The EIA specialists who contributed to the July 2024 ES have reviewed the Proposed Amendments leading to the Revised Proposed Development as a whole and its potential to generate any materially new or different environmental or socio-economic effects or changes to the conclusions of the July 2024 ES.

- 1.11 This December 2024 ES Addendum also includes responses to comments received from statutory consultees where relevant. Where these have been included and addressed, this is clearly outlined within the technical addendum assessments.
- 1.12 This December 2024 ES Addendum considers relevant legislation and relevant national, regional and local planning policy guidance and considers any updates to planning policy since the July 2024 ES.
- 1.13 Consideration has also been given to the validity of baseline data since July 2024 and a review of the current baseline conditions in comparison to those assessed in the July 2024 ES has been undertaken. The baseline surveys and data searches are considered to remain valid for the majority of the technical assessments presented within the December 2024 ES Addendum.
- 1.14 For all technical assessments, where relevant, sections of these ES Chapters have been updated and supersede (or replace) the relevant sections in the July 2024 ES. Where sections of the assessment and ES Chapter remain valid, this is stated and no update has been provided, therefore the updated ES Chapters should be read in conjunction with the corresponding July 2024 ES Chapters.
- 1.15 In addition to a review of ES Volume 1 of the July 2024 ES, the Heritage, Townscape and Visual Impact Assessment (ES Volume 2) and the Technical Appendices (ES Volume 3) have also been reviewed / updated where required/appropriate in line with the Proposed Amendments and considering the Revised Proposed Development as a whole. An Addendum to the Heritage, Townscape and Visual Impact Assessment is provided within Volume 2 of this ES Addendum.
- 1.16 A full list of the July 2024 Technical Appendices is re-provided in Table 1.11 of this ES Addendum, identifying which ones have been replaced or an Addendum provided.
- 1.17 A concluding chapter providing an overview of the conclusions of the December 2024 ES Addendum has been provided, and includes updates to Chapter 13: Effect Interactions, Chapter 14: Likely Significant Effects and Conclusions, and Chapter 15: Environmental Management, Mitigation and Monitoring of the July 2024 ES where relevant.
- 1.18 A replacement Non-Technical Summary ('NTS') document has been prepared (completely replacing the July 2024 NTS) and comprises part of the ES documentation, as required by the EIA Regulations. The replacement NTS is a document that is submitted to support the planning application which provides a concise summary of the ES written in non-technical language. The NTS presents a summary of the Revised Proposed Development, the alternatives considered by the Applicant, the residual likely significant environmental and socio-economic effects and any identified mitigation measures.

EIA Scoping

- 1.19 As part of the EIA Scoping process, a request for an EIA Scoping Opinion (hereafter referred to as the 'EIA Scoping Report') was submitted by the Applicant to the LBS on 11th January 2024 (LBS application reference: 24/AP/0111). An EIA Scoping Opinion was received from the LBS on 27th March 2024 (which was included in the July 2024 ES Volume 3, Appendix: EIA Methodology – Annex 2). The July 2024 ES was based on the Scoping Opinion received from LBS. Where clarifications raised by the EIA Scoping Opinion required additions or variations to the assessment scope originally set out within the EIA Scoping Report, these were addressed as part of the July 2024 ES.

Figure 1.1 Revised Cumulative Schemes Map



Cumulative Schemes

- 1.20** A review of planning applications submitted since the July 2024 ES has been undertaken to identify potential new cumulative schemes for inclusion within the December 2024 ES Addendum. The updated Cumulative Schemes map is presented in Figure 1.1 and further details on the cumulative schemes can be found in **Environmental Statement Addendum December 2024 Volume 3, Appendix: Main Report – Annex 4**. The Cumulative Schemes which have been identified to fall within the criteria established within the July 2024 ES are as set out below:
- **Map Reference 12:** 6-12 Verney Road London SE16 3DH (Application Ref: 23/AP/0948);
 - **Map Reference 25:** Surrey Canal Triangle To North Of, Surrey Canal Road, London, SE14 (Application Ref: DC/13/085143 within the London Borough of Lewisham);
 - **Map Reference 26:** 79-161 Ilderton Road London SE16 3JZ (Application Ref: 18/AP/2497);
 - **Map Reference 27:** 310-330 St Jamess Road London Southwark SE1 5JX (Application Ref: 21/AP/1667); and
 - **Map Reference 28:** Daisy Business Park, 19-35 Sylvan Grove, London SE15 1PD (Application Ref: 23/AP/0582).
- 1.21** Additionally, 213 Rye Lane London, SE15 4TP (16/AP/0131) has now been completed and forms part of the baseline.
- 1.22** These additional cumulative schemes have been reviewed and discussed further, where relevant, within the updated ES chapters.

DESIGN EVOLUTION OF THE PROPOSED AMENDMENTS

- 1.23** The design of the 2024 Proposed Development has evolved to capture the feedback received from statutory consultees and these design changes to the masterplan, massing, and elevations, as summarised below, form part of the Revised Proposed Development:
- Unit mix has been revised to provide over 60% 2-Bed flats while the residential dwelling layouts have been amended to increase dual-aspect and daylight;
 - The parapet to the south and west elevation of the roof terrace at level 18 of Building M has been enhanced to protect from dominant winds in severe weather scenarios. This wind mitigation feature will ensure the usability of the roof terrace throughout the year; A minor change in the elevational treatment to the south façade of Building D has occurred. This responds to comments made by LBS on fenestration pattern. Vertical piers have been included to bring an element of familiarity with the north façade of Building E;
 - As a response to the Agent of Change principles, the design of the Revised Proposed Development has ensured the northern side of the site to be pre-dominantly non-residential, with the north-facing units on upper floors of the buildings being dual aspect and provided with deck access, which will act as a noise barrier for the noise from Peckham High Street;
 - Changes to the parapet and elevation of Building L have occurred in response to the feedback noting the building to be top-heavy and lacking clarity;
 - More clarification has been provided to the boundary between the TfL bus station and the public realm around Building L as a response to the feedback received from TfL. This will ensure ease of pedestrian and cycle circulation; and
 - Refined articulation and facade treatment to Buildings A, B & C in response to Heritage England's comments, wherein the parapet and the setback has been altered to align the height and mass of the buildings with the surrounding historical site context.
- 1.24** Further details on the design evolution and considerations can be found in the DAS Addendum submitted along with this application.

PROPOSED AMENDMENTS AND REVISED PROPOSED DEVELOPMENT

- 1.25** The Proposed Amendments assessed within this December 2024 ES Addendum summarised below:
- A reduction in the number of homes from 877 to 867, alongside revisions to the unit size mix;
 - A minor reduction in the size of the proposed supermarket (-14sqm) and slight increase in the amount of flexible retail, leisure, commercial (use class E(a-g) and Sui Generis (drinking establishment) floorspace (+13sqm);
 - A reduction in the minimum amount of affordable housing to 77 homes (12% by habitable room), comprising 72% Social Rent and 28% Intermediate tenures (by habitable room). This is subject to a commitment to undertake a review of the scheme's viability at a future point to determine if an increased amount of affordable housing can be provided;
 - Change to the unit mix (decrease of 1bed, increase of 2/3 beds and addition of 4bed type);
 - Change to the unit mix within each tenure (no 1-bed in Social Rent, no 3-bed in Shared Ownership);
 - Change to the average internal square footage of some unit types;
 - No change to building heights with the exception of marginal changes to the massing of some top floor (setbacks, penthouse levels, etc.);
 - No change to the footprint of any building;
 - No changes to the overall façade design principles, balcony style and type, materials and colours, construction methods;
 - The adjustments to the internal layouts and unit typology mix result in minor changes to the fenestration and balcony placement to buildings A, B, C, H, K, L, N, P & Q. The following remaining buildings D, E, F, G, J, and M are largely unchanged;
 - Marginal changes to the layout of Morrisons supermarket and ancillary spaces;
 - Minor amendments to bin stores and plant rooms, cycle parking, amenity space, children's playspace to account for the above residential layout adjustments.
 - Changes to the elevational treatment of Building L cycle hub at ground and first floor levels.
- 1.26** This section sets out the relevant design information for the Revised Proposed Development. Where no further information is provided, this remains as previously presented within the July 2024 ES (document reference. AC18). Further details are set out within the updated Design and Access Statement (document ref. AC02A).

Quantum of Development and Land Uses

- 1.27** The Proposed Amendments have led to variations in the floorspace by use class, number of residential units and residential unit mix resulting in the Revised Proposed Development. This is presented across the following tables.
- 1.28** Table 1.3 sets out the proposed amount of development per use class for the Revised Proposed Development in comparison to the Proposed Development assessed within the July 2024 ES. Revised floor areas are provided as both gross internal area (GIA) and gross external area (GEA) for the Revised Proposed Development.

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Table 1.3 July 2024 ES / Revised Proposed Development Floorspace Schedule – per Land Use (GIA and GEA)

Land Use	GIA (m ²)		GEA (m ²)	
	July 2024 ES (Proposed Development)	Revised Proposed Development	July 2024 ES (Proposed Development)	Revised Proposed Development
Residential (Use Class C3)	88,388.0	88,810	97,736.0	97,840
Flexible Retail, Leisure and Commercial, (Use Class E(a-g)), including up to 350sqm GIA of Drinking Establishment (Sui Generis)	3,800.1	3,812.7	4,157.1	4,171.5
Workspace (Use Class E(g))	2,725.3	2,725.3	2,943.3	2,943.3
Supermarket (Use Class E(a))	10,725.8	10,712	11,079.8	11,049.9
Total	105,639.2	106,060	115,916.2	116,004.7

Residential Unit Numbers and Mix

- 1.29** The Revised Proposed Development will provide a total of 867 residential dwellings, which is a reduction of 10 dwellings compared to the July 2024 ES (which presented 877 dwellings). However, the number of habitable rooms have increased by 67 rooms, such that the Revised Proposed Development will provide 2,821 habitable rooms compared to the 2,754 habitable rooms within the July 2024 Proposed Development. This increase is due to the provision of 4-Bed residential dwellings in addition to the 1-Bed, 2-Bed and 3-Bed residential unit mix provided in July 2024 Proposed Development.
- 1.30** When compared with the July 2024 Proposed Development unit mix, the Revised Proposed Development will have a decreased number of 1-Bed dwellings whilst the number of 2 and 3-Bed dwellings will increase. While the tenures for the residential dwellings remain the same as provided within the July 2024 Proposed Development, the unit mix within these tenures has been revised.
- 1.31** The unit and tenure mix for the Revised Proposed Development is presented in Table 1.4 below. A comparison of the unit mix breakdown within each building is presented in Table 1.5.

Table 1.4 July 2024 ES / Revised Proposed Development Unit and Tenure Mix

Type	Market Sale		Social Rent (SR)		Intermediate (INT)	
	July 2024 ES (Proposed Development)	Revised Proposed Development	July 2024 ES (Proposed Development)	Revised Proposed Development	July 2024 ES (Proposed Development)	Revised Proposed Development
1B1P	90	90	0	0	0	0
1B2P	247	251	31	0	19	2
2B3P	9	90	33	12	36	9
2B4P	162	219	49	5	25	16
3B5P	10	45	72	16	5	0
3B6P	89	95	0	0	0	0
4B6P	-	0	-	17	-	0
Total units	607	790	185	50	85	27

Table 1.5 July 2024 ES / Revised Proposed Development Unit Mix by Building

Building	1B1P		1B2P		2B3P		2B4P		3B5P		3B6P		4B6P		Unit Totals	
	July 2024 ES	Revised	July 2024 ES	Revised	July 2024 ES	Revised	July 2024 ES	Revised	July 2024 ES	Revised	July 2024 ES	Revised	July 2024 ES	Revised	July 2024 ES	Revised
A	0	0	4	6	0	1	2	8	12	4	0	0	-	0	18	19
B	0	0	0	2	0	9	24	16	0	0	0	0	-	0	24	27
C	0	0	4	8	2	2	1	3	10	6	0	0	-	0	17	19
D	0	0	0	0	0	0	0	0	0	0	0	0	-	-	0	0
E	16	16	40	40	3	8	15	10	2	2	2	3	-	-	78	79
F	0	0	0	0	0	0	10	10	0	10	10	0	-	-	20	20
G	11	11	23	23	0	0	23	23	0	0	14	14	-	-	71	71
H	0	0	4	0	7	3	12	32	20	8	0	0	-	-	43	43
J1	12	12	50	32	0	18	29	29	0	0	17	17	-	-	108	108
J2	4	4	4	4	1	2	10	5	0	4	2	2	-	-	21	21
K	8	8	30	36	14	8	16	15	7	8	10	10	-	-	85	85
L	18	18	40	12	10	4	26	42	0	0	0	9	-	-	94	85
M	15	15	33	33	6	44	55	17	6	0	34	40	-	-	149	149
N	6	6	46	54	9	0	3	1	0	3	0	0	-	-	64	64
P	0	0	12	0	21	12	10	5	18	16	0	0	-	17	61	50
Q	0	0	7	3	5	0	0	24	12	0	0	0	-	0	24	27
TOTAL	90	90	297	253	78	111	236	240	87	61	89	95	-	17	877	867

- 1.32** The Revised Proposed Development will provide 12% affordable housing (by habitable rooms) comprising of intermediate and social rented units, compared with the Proposed Development which included 30.8%. Low-cost Rent tenure which comprises of Social Rent tenure will make up approximately 72% (by habitable rooms) of the total affordable housing mix whereas 28% (by habitable rooms) will be intermediate tenure (comprising of shared ownership or Community Land Trusts).

Non-residential Floor Areas (Excluding Replacement Supermarket)

- 1.33** The Revised Proposed Development will see a minor increase of 12.6m² in the total non-residential floor areas provided across the 12 buildings, as detailed in Table 1.6.

Table 1.6 July 2024 ES / Revised Proposed Development Non-Residential Land Uses (Excluding Replacement Supermarket)

Building	Area (GIA) (m ²)		Proposed Non-Residential Use
	July 2024 ES (Proposed Development)	Revised Proposed Development (Associated Change shown in brackets)	
A	459.0	427.3 (-31.7)	Flexible Retail, Leisure and Commercial
B	401.0	425.5 (+24.5)	Flexible Retail, Leisure and Commercial
C	401.0	392.4 (-8.6)	Flexible Retail, Leisure and Commercial

Building	Area (GIA) (m ²)		Proposed Non-Residential Use
	July 2024 ES (Proposed Development)	Revised Proposed Development (Associated Change shown in brackets)	
D	2,725.3	2725.3 (=)	Workspace
E	341.0	341.0 (=)	Flexible Retail, Leisure and Commercial
F	207.5	207.5 (=)	Flexible Retail, Leisure and Commercial
G	276.2	276.2 (=)	Flexible Retail, Leisure and Commercial
H	217.3	244.2 (+26.9)	Flexible Retail, Leisure and Commercial
J1	125.3	125.3 (=)	Flexible Retail, Leisure and Commercial
K	1,259.4	1,259.4 (=)	Flexible Retail, Leisure and Commercial
L	16.2	16.5 (+0.3)	Flexible Retail, Leisure and Commercial
N	96.2	97.4 (+1.2)	Flexible Retail, Leisure and Commercial
TOTAL	6,525.4	6,538.0 (+12.6)	N/A

Site Layout and General Arrangement

- 1.34 The building footprints of the Revised Proposed Development remain the same as the July 2024 Proposed Development. The changes to the buildings’ layout and general arrangement as a result of the Proposed Amendments have been presented within the following sections. The design changes not discussed within the following sections remain as presented within the July 2024 ES.
- 1.35 A layout of the third floor of the Revised Proposed Development is presented in Figure 1.3 as a representation of the typical residential floors across the Revised Proposed Development. The revised ground floor, roof and basement layout are presented within Figure 1.2, Figure 1.4 and Figure 1.5.

Figure 1.2 Ground Floor Layout of the Revised Proposed Development



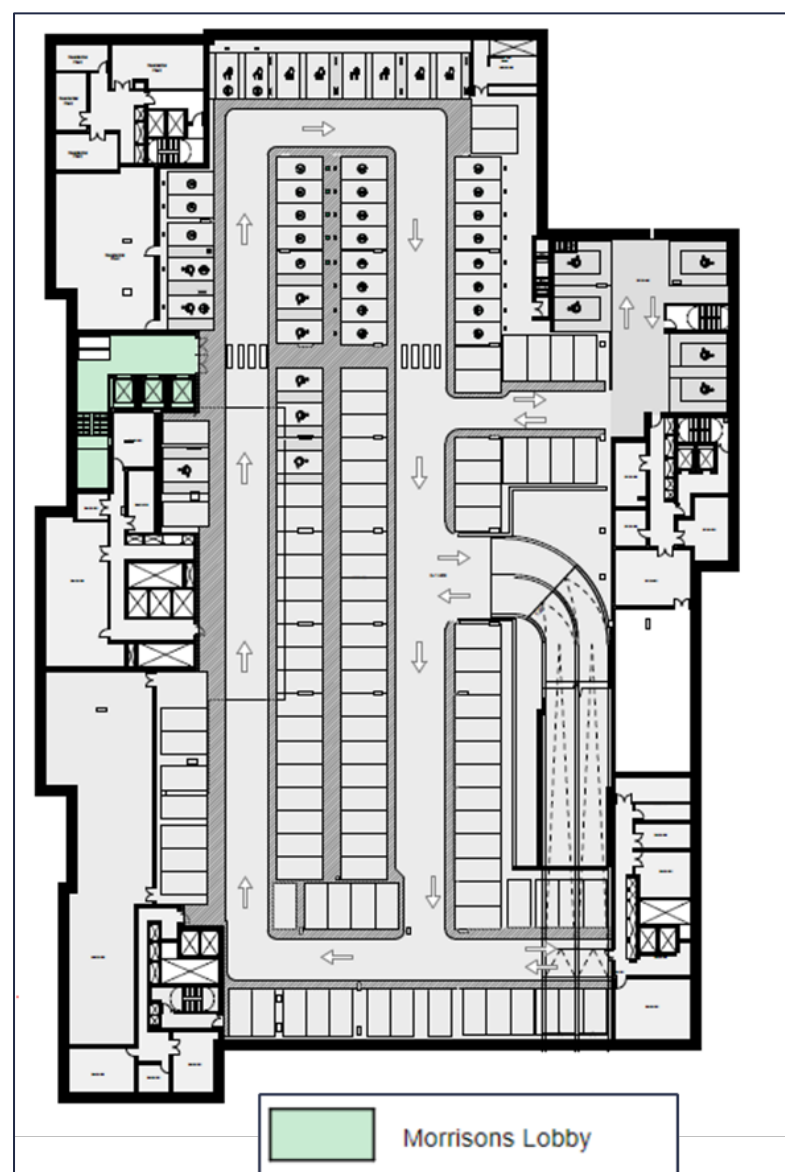
Figure 1.3 Third Floor Layout of the Revised Proposed Development



Figure 1.4 Roof Level Layout of the Revised Proposed Development



Figure 1.5 Basement Layout of the Revised Proposed Development



Building A, B and C

- 1.36** The building layouts have been redesigned as a result of the Proposed Amendments to accommodate the change in the residential mix and includes redesign of all residential dwellings, including the balconies placement provided within Building A, B and C.
- 1.37** Building A will provide a total of 19 residential dwellings spread across Level 1 to Level 6 and comprising of six 1-Bed, nine 2-Bed and four 3-Bed residential dwellings. This is an increase of one overall dwelling as compared to the July 2024 Proposed Development. The floorspace provision for the single flexible retail, leisure and commercial unit on the ground floor has reduced from 459m² (GIA) within July 2024 Proposed Development to 427m² (GIA) as part of the Revised Proposed Development.
- 1.38** Building B will provide a total of 27 residential dwellings spread across Level 1 to Level 6 and comprising of two 1-Bed and 25 2-Bed residential dwellings. This is an increase of three overall dwellings as compared to the Proposed Development. The floorspace provision for the single flexible retail, leisure and commercial unit on the ground floor has reduced from 459m² (GIA) within July 2024 Proposed Development to 426m² (GIA) as part of the Revised Proposed Development.

- 1.39** Building C will provide a total of 19 residential dwellings spread across Level 1 to Level 6 and comprising of eight 1-Bed, five 2-Bed and six 3-Bed residential dwellings. This is an increase of two overall dwellings as compared to the July 2024 Proposed Development. The floorspace provision for the single flexible retail, leisure and commercial unit on the ground floor has reduced from 401m² (GIA) within Proposed Development to 392m² (GIA) as part of the Revised Proposed Development.

Building E

- 1.40** The number of residential dwellings provided in Building E of the Revised Proposed Development has increased by one to total 79 residential dwellings, which will comprise of 56 1-Bed, 18 2-Bed and five 3-Bed residential dwellings across Level 1 to 10.

Building F

- 1.41** The flexible retail, leisure and commercial space provided on ground floor of Building F has increased from 201m² to 207.5m² within the Revised Proposed Development.

Building H

- 1.42** The total number of residential dwellings provided within Building H of the Revised Proposed Development remains the same as the July 2024 Proposed Development, at 43 residential dwellings. However, the unit mix has changed to remove the provision of 1-Bed unit type such that the revised unit mix will now comprise of 35 2-Bed and eight 3-Bed residential dwellings. This change in the unit mix also results in a slight change to the balcony placements within the building.
- 1.43** The total amenity space provided within the building as part of the Revised Proposed Development has reduced to 430m² (GIA) from 486m² while the flexible retail, leisure and commercial space provided on ground floor has increased from 217m² to 244m², in comparison to the July 2024 Proposed Development.

Building J1 and J2

- 1.44** The overall number of residential dwellings provided within Building J1 and J2 remains the same at 108 and 21 residential dwellings respectively. As part of the Revised Proposed Development, minor redesigning of the internal layouts of a few residential dwellings within the buildings has been undertaken.

Building K

- 1.45** The overall number of residential dwellings provided within Building K remains the same at 85 residential dwellings. As part of the Revised Proposed Development, minor redesigning of the internal layouts of a few residential dwellings within the building has been undertaken.

Building L

- 1.46** Building L will provide a total of 85 residential dwellings within the Revised Proposed Development, which is a decrease of nine residential dwellings in comparison to the Proposed Development. The unit mix will now comprise of 30 1-Bed, 46 2-Bed and nine 3-Bed residential dwellings.

Building M

- 1.47** The overall number of residential dwellings provided within Building M remains the same at 149 residential dwellings. As part of the Revised Proposed Development, minor redesigning of the internal layouts of a few residential dwellings has been undertaken.

Building N

1.48 The overall number of residential dwellings provided within Building N remains the same at 64 residential dwellings. However, the unit mix has changed as part of the Revised Proposed Development, to provide three 3-Bed residential dwellings. Minor redesigning of the internal layouts of a few residential dwellings has been undertaken as well.

Building P

1.49 The total number of residential dwellings within Building P has reduced by 11 to provide 50 residential dwellings. In comparison to the Proposed Development, the provision of 1-Bed units has been removed in the Revised Proposed Development and 4-Bed residential accommodation has been included such that the revised unit mix for Building P will comprise of 17 2-Bed, 16 3-Bed and 17 4-Bed residential dwellings.

Building Q

1.50 The total number of residential dwellings within Building Q has increased by three to provide 27 residential dwellings. The redesigning of the internal layout of all the residential dwellings within Building Q has been undertaken as part of the Revised Proposed Development.

Podium / Replacement Supermarket

1.51 Minor changes to the internal layout of the Replacement Supermarket have been undertaken along with a reduction in the floorspace by 14m² resulting in the total area of the Replacement Supermarket (excluding associated service yard and car park) within the Revised Proposed Development as 4,436m².

Massing

1.52 As part of the Revised Proposed Development, minor massing changes have been incorporated within Building K. This relates to the massing at the end of the deck on Level 6 being slightly reduced to lighten the impact on the skyline above the south frontage on Peckham High Street.

1.53 For the minor change in Building N, the footprint of the end unit on the deck has been extended towards the podium (north façade), however, this change does not impact the massing of the building as the area was previously an external covered access deck which has now been included in the residential dwelling layout.

Appearance

1.54 Minor changes to the fenestration and balcony placement across Buildings A, B, C, H, K, L, N, P and Q have been introduced as a result of the changes to the internal residential layouts and unit mix. The remaining buildings D, E, F, G, J, and M are largely unchanged in the context of the EIA.

Public Realm and Landscaping

1.55 Minor adjustments to the ground floor landscaping layout have occurred as a result of the shift in the door positions within the Revised Proposed Development. The revised landscape masterplans for the Revised Proposed Development are presented in Figure 1.6 and Figure 1.7.

1.56 When compared to the Proposed Development, the additional communal residential amenity space has increased by 99m², totalling 3,955m² within the Revised Proposed Development. The total public realm area provided within the Revised Proposed Development will increase by 833m², while the children's playspace provisions will reduce by 660m² in comparison to the July 2024 Proposed Development.

Table 1.7 July 2024 ES / Revised Proposed Development Public Realm and Amenity Space

Land Use	July 2024 ES Proposed Development Area (m ²)	Revised Proposed Development Area (m ²)
Public Amenity Space	9,407	10,240
Private Amenity Space	Provided in the form of a private balcony/terrace within each residential dwelling	Provided in the form of a private balcony/terrace within each residential dwelling
Residential Communal Amenity Space	3,856	3,955
Playspace	3,077	2,417

1.57 Some of the tree species proposed within the July 2024 Proposed Development have been adjusted in response to the comments received from the LBS Urban Forrester. The revised landscape masterplans are presented in Figure 1.6 and Figure 1.7.

Playspace

1.58 The Revised Proposed Development will incorporate a total of 2,417m² of playspace and has made adequate provision for space designed for all age groups. Table 1.8 sets out the comparison of the revised amount of playspace required by the Greater London Authority (GLA) by age profile, compared to the playspace provided within the Revised Proposed Development along with the comparison of the playspace provisions within the Proposed Development.

Table 1.8 July 2024 ES / Revised Proposed Development Playspace Provision

Play Typology (Age Profile)	July 2024 ES Proposed Development		Revised Proposed Development (Associated Change shown in brackets)	
	Playspace Target (m ²)	Playspace Provision (m ²)	Playspace Target (m ²)	Playspace Provision (m ²)
0 – 4 Years	1,608	1,610	942	1,303
5 – 11 Years	1,203	1,257	739	904
12+ Years	777 (majority to be provided off-site)	210	551 (majority to be provided off-site)	210
TOTAL	3,588	3,077	2,232	2,417

Biodiversity Net Gain

1.59 The July 2024 Proposed Development achieved a net gain of 1.67 habitats units, resulting in a 111.02% increase. Based upon the updated landscape strategy for the Revised Proposed Development, the Revised Proposed Development will result in an increase of 106.11% habitat units. An updated Biodiversity Net Gain Assessment has been prepared and submitted in support of the Proposed Amendments.

Figure 1.6 Revised Proposed Development – Ground Floor Landscaping Masterplan

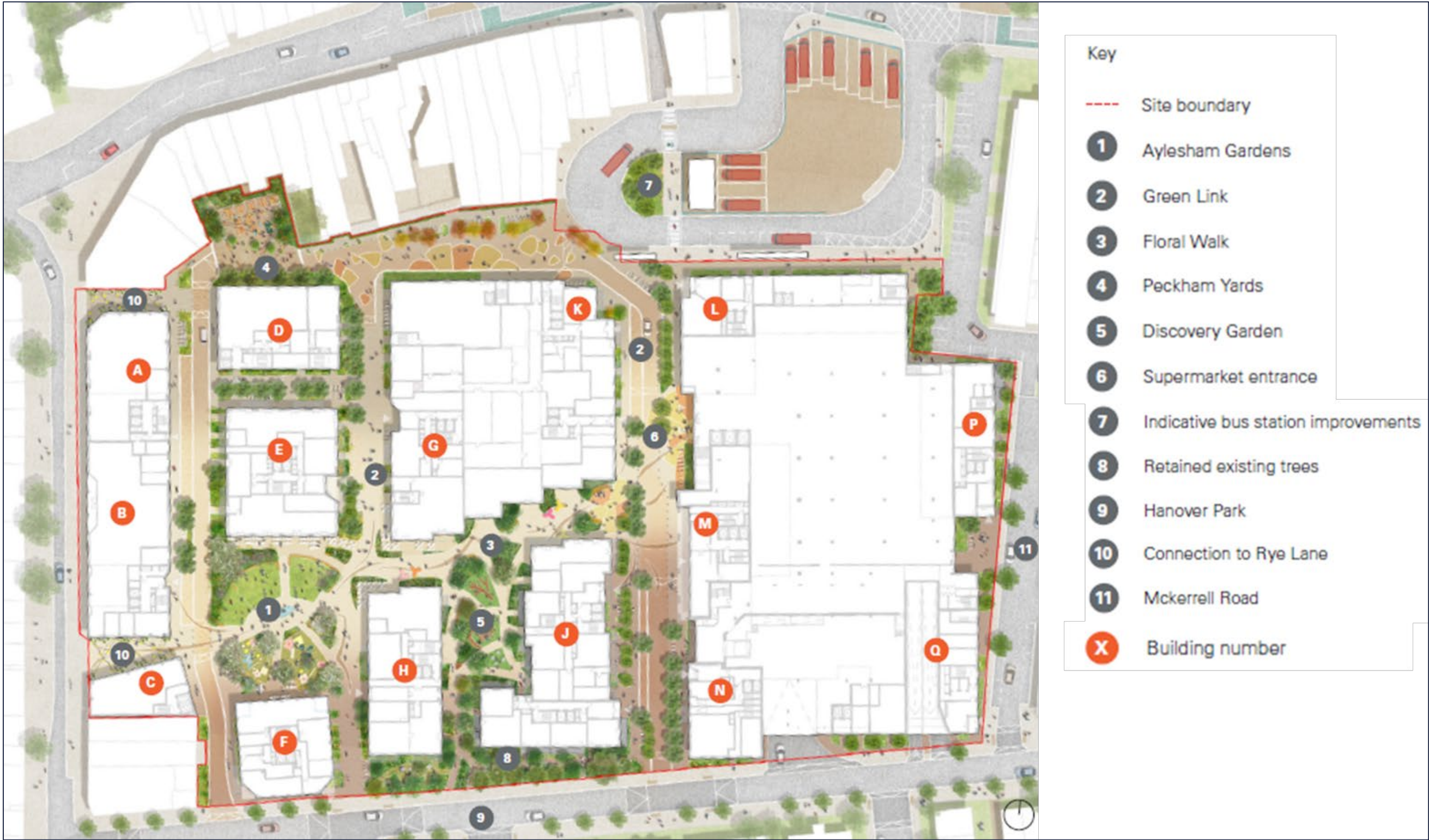
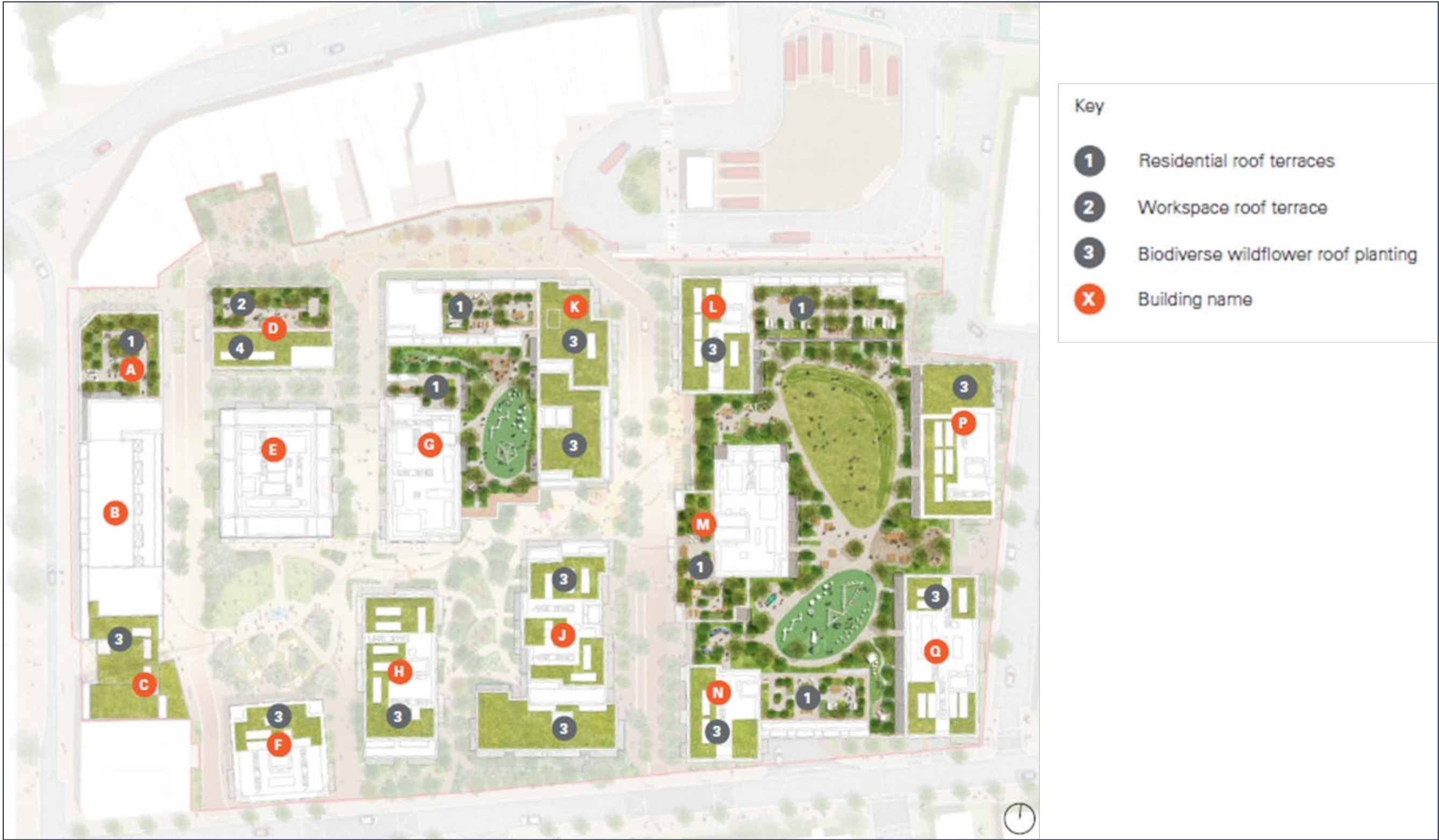


Figure 1.7 Revised Proposed Development – Upper Levels Landscaping Masterplan



ACCESS, PARKING AND SERVICING

Cycle Parking

1.60 A total of 1871 cycle parking spaces will be provided within the Revised Proposed Development which is an increase of six parking spaces as compared to the July 2024 Proposed Development. This difference comprises an increase of five long stay and one short stay cycle parking spaces within the Revised Proposed Development. A summary of the changes to long stay and short stay cycle parking provision are shown in Table 1.9 and Table 1.10 respectively.

Table 1.9 Comparison of Long Stay Cycle Parking Provision

Use	July 2024 ES (July 2024 Proposed Development)	Revised Proposed Development
Residential	1,517	1,520 (+2)
Supermarket	26	26 (=)
Flexible retail, leisure and commercial (excl Supermarket)	22	24 (+2)
Workspace	44	44 (=)
Overall Total	1,609	1,614 (+5)

Table 1.10 Comparison of Short Stay Cycle Parking Provision

Use	July 2024 ES (July 2024 Proposed Development)	Revised Proposed Development
Residential	44	44 (=)
Supermarket	63	63 (=)
Flexible retail, leisure and commercial (excl Supermarket)	142	143 (+1)
Workspace	7	7 (=)
Overall Total	256	257 (+1)

DEMOLITION AND CONSTRUCTION

1.61 The Proposed Amendments do not result in any changes to the demolition and construction methodology, proposed phasing and associated assumptions of the Proposed Development as detailed in **ES Volume 1, Chapter 5: Demolition and Construction**; as such the demolition and construction phase assessments presented within the technical assessments of the July 2024 ES (**ES Volume 1, Chapter 6 to 14** and **ES Volume 2**) remain applicable and valid.

NON-TECHNICAL SUMMARY (REPLACEMENT)

1.62 A separate document, referred to as the Non-Technical Summary (NTS), provides a concise summary of the July 2024 ES and this ES Addendum written in non-technical language. This NTS replaces the NTS prepared for the July 2024 ES.

ES ADDENDUM STRUCTURE

1.63 Table 1.11 details the ES Chapters and Appendices which have been reviewed in the context of the Revised Proposed Development across Volumes 1, 2 and 3 of the July 2024 ES.

1.64 Table 1.12 details the structure of this the December 2024 ES Addendum.

Aylesham Centre Environmental Statement Addendum December 2024

Main Report: Introduction, ES Addendum Approach and Proposed Amendments

Table 1.11 July 2024 ES Chapter and Appendices which have been Reviewed Within this December 2024 ES Addendum

Chapter / Appendix Included within the July 2024 ES	Chapters / Appendix Numbering Included within the July 2024 ES	Amended / Replaced as part of the December 2024 ES Addendum?
Environmental Statement Volume 1		
Introduction	Chapter 1	YES - An Addendum introduction section has been provided within this December 2024 ES Addendum. This falls within <i>ES Addendum December 2024 Volume 1, Main Report</i> . This should be read in conjunction with the Introduction Chapter included within the July 2024 Environmental Statement (refer to Environmental Statement Volume 1, Chapter 1: Introduction).
EIA Methodology	Chapter 2	YES - An Addendum section outlining the Environmental Statement Addendum Approach has been provided within this December 2024 ES Addendum. This falls within <i>ES Addendum December 2024 Volume 1, Main Report, Introduction, ES Addendum Approach and Proposed Amendments</i> . This should be read in conjunction with the EIA Methodology Chapter included within the July 2024 Environmental Statement (Environmental Statement Volume 1, Chapter 2: EIA Methodology).
Alternatives and Design Evolution	Chapter 3	YES - An Addendum section outlining the design evolution and consultation undertaken since the July 2024 Environmental Statement and has been provided within this December 2024 ES Addendum (refer to <i>ES Addendum December 2024 Volume 1, Main Report Introduction, ES Addendum Approach and Proposed Amendments</i>). This should be read in conjunction with the Alternatives and Design Evolution chapter included within the July 2024 Environmental Statement (Environmental Statement Volume 1, Chapter 3: Alternatives and Design Evolution).
The Proposed Development	Chapter 4	YES - An Addendum section outlining the Proposed Amendments which have affected the July 2024 Proposed Development. This has been provided within this December 2024 ES Addendum (refer to <i>ES Addendum December 2024 Volume 1, Main Report Introduction, ES Addendum Approach and Proposed Amendments</i>). This should be read in conjunction with the Proposed Development chapter included within the July 2024 Environmental Statement as those details which have not been affected by the Proposed Amendments remain as stated within the July 2024 Environmental Statement (Environmental Statement Volume 1, Chapter 4: The Proposed Development).
Demolition and Construction	Chapter 5	YES - An Addendum section confirming that the demolition and construction assessment outlined within the July 2024 Environmental Assessment remains unchanged. This section is provided within this December 2024 ES Addendum (refer to <i>ES Addendum December 2024 Volume 1, Main Report Introduction, ES Addendum Approach and Proposed Amendments</i>). This should be read in conjunction with the Demolition and Construction chapter included within the July 2024 Environmental Statement (Environmental Statement Volume 1, Chapter 5: Demolition and Construction).
Socio-Economics	Chapter 6	YES - An Addendum section has been provided to consider the impacts of the Revised Proposed Development and if this has resulted in a change in effects. The Socio-economics Addendum provided within this December 2024 ES Addendum (refer to <i>ES Addendum December 2024, Volume 1, Chapter 6: Socio-Economics</i>) should be read in conjunction with the July 2024 Environmental Statement Socio-Economics Assessment (refer to Environmental Statement Volume 1, Chapter 6: Socio-Economics of the July 2024 ES).
Traffic and Transport	Chapter 7	YES - An Addendum section has been provided to consider the impacts of the Revised Proposed Development and if this has resulted in a change in effects. The Traffic and Transport Addendum provided within this December 2024 ES Addendum (refer to <i>ES Addendum December 2024, Volume 1, Chapter 7: Traffic and Transport</i>) should be read in conjunction with the July 2024 Environmental Statement (refer to Environmental Statement Volume 1, Chapter 7: Traffic and Transport of the July 2024 ES).
Air Quality	Chapter 8	YES - An Addendum section has been provided to consider the impacts of the Revised Proposed Development and if this has resulted in a change in effects. The Air Quality Addendum provided within this December 2024 ES Addendum (refer to <i>ES Addendum December 2024, Volume 1, Chapter 8: Air Quality</i>) should be read in conjunction with the July 2024 Environmental Statement (refer to Environmental Statement Volume 1, Chapter 8: Air Quality of the July 2024 ES).
Noise and Vibration	Chapter 9	YES – An Addendum section has been provided to consider the impacts of the Revised Proposed Development and if this has resulted in a change in effects. The Noise and Vibration Addendum provided within this December 2024 ES Addendum (refer to <i>ES Addendum December 2024, Volume 1, Chapter 9: Noise and Vibration</i>) should be read in conjunction with the July 2024 Environmental Statement Noise and Vibration Assessment (refer to Environmental Statement Volume 1, Chapter 9: Noise and Vibration of the July 2024 ES).
Daylight, Sunlight and Overshadowing	Chapter 10	YES – An Addendum section has been provided to consider the impacts of the Revised Proposed Development and if this has resulted in a change in effects. The Daylight, Sunlight and Overshadowing Addendum provided within this December 2024 ES Addendum (refer to <i>ES Addendum December 2024, Volume 1, Chapter 10: Daylight, Sunlight and Overshadowing</i>) should be read in conjunction with the July 2024 Environmental Statement Daylight, Sunlight and Overshadowing Assessment (refer to Environmental Statement Volume 1, Chapter 10: Daylight, Sunlight and Overshadowing of the July 2024 ES).
Wind Microclimate	Chapter 11	YES - An Addendum section has been provided to consider the impacts of the Revised Proposed Development and if this has resulted in a change in effects. The Wind Microclimate Addendum provided within this December 2024 ES Addendum (refer to <i>ES Addendum December 2024, Volume 1, Chapter 11: Wind Microclimate</i>) should be read in conjunction with the July 2024 Environmental Statement Wind Microclimate Assessment (refer to Environmental Statement Volume 1, Chapter 11: Wind Microclimate of the July 2024 ES).
Archaeology	Chapter 12	YES - An Addendum section has been provided to consider the impacts of the Revised Proposed Development and if this has resulted in a change in effects. The Archaeology Addendum provided within this December 2024 ES Addendum (refer to <i>ES Addendum December 2024, Volume 1, Chapter 12: Archaeology</i>) should be read in conjunction with the July 2024 Environmental Statement Archaeology Assessment (refer to Environmental Statement Volume 1, Chapter 12: Archaeology of the July 2024 ES).
Ground Conditions and Land Contamination	Chapter 13	YES - An Addendum section has been provided to consider the impacts of the Revised Proposed Development and if this has resulted in a change in effects. The Ground Conditions and Land Contamination Addendum provided within this December 2024 ES Addendum (refer to <i>ES Addendum December 2024, Volume 1, Chapter 13: Ground Conditions and Land Contamination</i>) should be read in conjunction with the July 2024 Environmental Statement Archaeology Assessment (refer to Environmental Statement Volume 1, Chapter 13: Ground Conditions and Land Contamination of the July 2024 ES).
Climate Change and Greenhouse Gases	Chapter 14	YES – An Addendum section has been provided (<i>ES Addendum December 2024 Volume 1, Chapter 14: Climate Change</i>) responding to comments and providing consideration as to whether the Revised Proposed Development has resulted in any material changes to the conclusions stated within the July 2024 ES. This should be read in conjunction with the July 2024 Environmental Statement Climate Change Assessment (refer to Environmental Statement Volume 1, Chapter 14: Climate Change).
Effect Interactions	Chapter 15	YES - An Addendum section has been provided to consider any new effect interactions identified across the December 2024 ES Addendum technical chapters. The Effect Interactions Addendum provided within this December 2024 ES Addendum (refer to <i>ES Addendum December 2024, Volume 1, Concluding Document</i> ;) should be read in conjunction with the July 2024 Environmental Statement Effect Interactions Chapter (refer to Environmental Statement Volume 1, Chapter 15: Effect Interactions of the July 2024 ES).
Likely Significant Effects and Conclusions	Chapter 16	YES - An Addendum section has been provided to consider any new likely significant effects and conclusions identified across the December 2024 ES Addendum technical chapters. The Likely Significant Effects and Conclusions Addendum provided within this December 2024 ES Addendum (refer to <i>ES Addendum December 2024, Volume 1, Concluding Document</i> ;) should be read in conjunction with the July 2024 Environmental Statement Likely Significant Effects and Conclusions Chapter (refer to Environmental Statement Volume 1, Chapter 16: Likely Significant Effects and Conclusions of the July 2024 ES).
Environmental Management, Mitigation and Monitoring	Chapter 17	YES - An Addendum section has been provided to consider any new environmental management, mitigation and monitoring identified across the December 2024 ES Addendum technical chapters. The Environmental Management, Mitigation and Monitoring Addendum provided within this December 2024 ES Addendum (refer to <i>ES Addendum December 2024, Volume 1, Concluding Document</i> ;) should be read in conjunction with the July 2024 Environmental Statement Likely Significant Effects and Conclusions Chapter (refer to Environmental Statement Volume 1, Chapter 17: Environmental Management, Mitigation and Monitoring of the July 2024 ES).

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Main Report: Introduction, ES Addendum Approach and Proposed Amendments

Chapter / Appendix Included within the July 2024 ES	Chapters / Appendix Numbering Included within the July 2024 ES	Amended / Replaced as part of the December 2024 ES Addendum?
Environmental Statement Volume 2		
Heritage, Townscape and Visual Impact Assessment	-	YES - An addendum assessment has been provided to consider the impacts of the Revised Proposed Development and if this has resulted in a change in effects. The Heritage, Townscape and Visual Impact Addendum Assessment should be read in conjunction with the July 2024 Environmental Statement Heritage, Townscape and Visual Impact Assessment (refer to Environmental Statement Volume 2 of the July 2024 ES).
Environmental Statement Volume 3		
Introduction	Annex 1: Location of Information within the ES	YES - An updated Wayfinding documents has been prepared to account for any changes to the replacement chapters included within this December 2024 ES Addendum and providing signposting as to where responses have been addressed to the comments received by the statutory consultees. The updated Wayfinding is located in December 2024 ES Addendum, Volume 3, Appendix Main Report - Annex 1 .
	Annex 2: Trium Statement of Competence	No updates. This remains as presented within the July 2024 Environmental Statement (Environmental Statement, Volume 3, Appendix: Introduction – Annex 2)
	Glossary and Abbreviations	No updates. This remains as presented within the July 2024 Environmental Statement (Environmental Statement, Volume 3, Appendix: Introduction – Annex 3)
EIA Methodology	Annex 1: EIA Scoping Report	No updates. This remains as presented within the July 2024 Environmental Statement (Environmental Statement, Volume 3, Appendix: EIA Methodology – Annex 1).
	Annex 2: EIA Scoping Opinion	No updates. This remains as presented within the July 2024 Environmental Statement (Environmental Statement, Volume 3, Appendix: EIA Methodology – Annex 2).
	Annex 3: Cumulative Schemes	YES –December 2024 ES Addendum, Volume 3, Appendix Main Report - Annex 3: Revised Cumulative Schemes. An updated list of Cumulative Schemes has been included due to the addition of new cumulative schemes into the December 2024 ES Addendum compared to the July 2024 Environmental Statement.
Air Quality	Annex 1: Glossary; Annex 2: Legislative and Planning Policy Context; Annex 3: Construction Dust Assessment Procedure; Annex 4: EPUK & IAQM Planning for Air Quality Guidance; Annex 5: Professional Experience; Annex 6: Modelling Methodology; Annex 7: Air Quality Positive Statement; Annex 8: Construction Mitigation; Annex 9: Preliminary Air Quality Assessment; Annex 10: References; Annex 11: Air Quality Monitoring Report (February 2023).	Unless specifically addressed within this ES Addendum December 2024 Volume 1, this remains as presented within the July 2024 Environmental Statement (Environmental Statement, Volume 3, Appendix: Air Quality – Annexes 1-11).
Noise and Vibration	Annex 1: Acoustic Terminology Annex 2: Relevant Acoustic Standards, Policies & Legislation Annex 3: Environmental Noise Survey Report Annex 4: Noise Modelling Assumptions	Unless specifically addressed within this ES Addendum December 2024 Volume 1, this remains as presented within the July 2024 Environmental Statement (Environmental Statement, Volume 3, Appendix: Noise and Vibration – Annex 1-4).

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Main Report: Introduction, ES Addendum Approach and Proposed Amendments

Chapter / Appendix Included within the July 2024 ES	Chapters / Appendix Numbering Included within the July 2024 ES	Amended / Replaced as part of the December 2024 ES Addendum?
Daylight, Sunlight and Overshadowing	Annex 1: Drawings of the Existing Buildings and the Proposed Development ; Annex 2: Drawings Showing Locations of Windows Assessed; Annex 3: Daylight and Sunlight Analyses of Proposed Development in relation to Surrounding Properties; Annex 4: No skyline contour drawings Annex 5: Overshadowing Assessment	Unless specifically addressed within this ES Addendum December 2024 Volume 1, this remains as presented within the July 2024 Environmental Statement (Environmental Statement, Volume 3, Appendix: Daylight, Sunlight and Overshadowing – Annex 1-5).
Wind Microclimate	Annex 1: Wind Microclimate Assessment	YES – Minor updates included in December 2024 ES Addendum Annex 1 to capture marginal changes to the residual effects and the mitigation considered. Refer to <i>ES Addendum December 2024 Volume 3, Appendix Wind Microclimate Annex 1 and Annex 2.</i>
Archaeology	Annex 1: Archaeological Desk-Based Assessment (DBA)	YES – Updated in December 2024 ES Addendum to capture a new dataset held on the Greater London Historic Environment Record (GLHER). Refer to <i>ES Addendum December 2024 Volume 3, Appendix Archaeology – Annex 2.</i>
	Annex 2: Written Scheme of Investigation (WSI)	No updates. Remains the same as presented within the July 2024 Environmental Statement (<i>Environmental Statement Volume 3, Appendix: Archaeology – Annex 2.</i>).
	Annex 3: Consultation with Christopher Constable (London Borough of Southwark’s Archaeology Advisor)	No updates. Remains the same as presented within the July 2024 Environmental Statement (<i>Environmental Statement Volume 3, Appendix: Archaeology – Annex 3.</i>).
Ground Conditions and Land Contamination	Annex 1: Legislation and Planning Policy; Annex 2: Phase 1 Land Contamination Assessment (Phase 1 LCA) (RMA Environmental; December 2023); Annex 3: Basement Impact Assessment (Walsh 2024); Annex 4: Utilities Survey (Plowman Craven; 2018).	Unless specifically addressed within this ES Addendum December 2024 Volume 1, this remains as presented within the July 2024 Environmental Statement (Environmental Statement, Volume 3, Appendix: Ground Conditions and Land Contamination – Annex 1-4).
Climate Change and Greenhouse Gases	Annex 1: Climate Change Technical Note Annex 2: Policy and Guidance Background Annex 3: Extract from Whole Life-Cycle Carbon Assessment Annex 4: Extract from the Energy Statement Annex 5: Professional Experience	Unless specifically addressed within this ES Addendum December 2024 Volume 1, this remains as presented within the July 2024 Environmental Statement (Environmental Statement, Volume 3, Appendix: Climate Change and Greenhouse Gases – Annex 1-5).
Non-Technical Summary (NTS)	N/A	YES – A Replacement Non-Technical Summary has been provided within this December 2024 ES Addendum. This replaces the Non-Technical Summary included within the July 2024 Environmental Statement.

Table 1.12 December 2024 ES Addendum Structure

Chapter / Appendix Location within the December 2024 ES Addendum	Chapters / Appendices included within the December 2024 ES Addendum
Environmental Statement Addendum Volume 1	
Main Report	Chapter 1: Introduction, ES Addendum Approach and Proposed Design Amendments Chapter 6: Socio-Economics Chapter 7: Traffic and Transport Chapter 8: Air Quality Chapter 9: Noise and Vibration Chapter 10: Daylight, Sunlight and Overshadowing Chapter 11: Wind Microclimate Chapter 12: Archaeology Chapter 13: Ground Conditions Chapter 14: Climate Change and Greenhouse Gases Chapter 15: Summary and Conclusions
Environmental Statement Addendum Volume 2	
Heritage, Townscape and Visual Impact Assessment Addendum	Annex 1: Additional Methodology Tables
	Annex 2: Greater London Authority (GLA) Response
	Annex 3: Historic England (HE) Response
	Annex 4: London Borough of Lambeth (LBL) Response
	Annex 5: Additional Cumulative Schemes
Environmental Statement Addendum Volume 3	
Appendix: Main Report	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
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: Wind Microclimate	Annex 1: Wind Microclimate Assessment (December 2024)
Appendix: Archaeology	Annex 1: Bibliography of Guidance and Legislation
	Annex 2: Addendum to the 2024 Archaeological Desk-Based Assessment

Chapter 6: Socio-Economics

INTRODUCTION

6.1 The Socio-Economics Chapter of the July 2024 ES (Chapter 6) has been reviewed in the context of the Revised Proposed Development to determine if the conclusions of this assessment remain valid. In addition, consideration has been given to any updates / changes to baseline, policy and methodology.

CONSULTATION SINCE THE JULY 2024 ES

6.2 An ES Review was provided by LUC in November 2024 (Review report being dated October 2024), responses to the clarifications raised in LUC's ES Review are presented in Table 6.1 below.

Table 6.1 ES Review Response Table

Requested Clarification / Potential Regulation 25	Response
Clarification Point (Ref: SE1) It should be made clear that without mitigation cumulative impacts on healthcare will be adverse and significant.	The LUC review states: <i>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.</i> If the cumulative developments are not subject to S106 agreements to mitigate impacts, CIL revenue would be available for the LPA to prioritise healthcare infrastructure. Any adverse effects on healthcare from housing development should be temporary given ICB funding allocation would adjust according to population.

LEGISLATION, PLANNING POLICY AND GUIDANCE

6.3 There is no additional legislation, policy or guidance to consider since the July 2024 ES.

ASSESSMENT METHODOLOGY

Defining the Baseline

6.4 The method for determining the baseline conditions remain the same as presented within the July 2024 ES.

Impact Assessment Methodology

6.5 There are no changes to the assessment methodology set out within the July 2024 ES Socio-Economics Chapter. Consequently, the assessment methodology and significance criteria stated in the July 2024 ES Socio-Economics Chapter remains applicable and valid.

Methodology For Defining Effects

Receptors And Receptor Sensitivity

6.6 No amendments have been made to the receptors or their sensitivity considered in the July 2024 ES Socio-Economics Chapter.

Magnitude of Impact

6.7 No amendments have been made to the method to determine magnitude of impact and it remains the same as considered in the July 2024 ES Socio-Economics Chapter.

Defining the Effect

6.8 No amendments have been made to the method used for defining the effects and it remains the same as considered in the July 2024 ES Socio-Economics Chapter.

Categorising Likely Significant Effects

6.9 No amendments have been made to the categorisation of likely significant effects and it remains the same as considered in the July 2024 ES Socio-Economics Chapter.

BASELINE CONDITIONS

Current Baseline Conditions

6.10 There is no material change to the baseline conditions as presented within the July 2024 ES.

IMPLICATIONS OF THE REVISED PROPOSED DEVELOPMENT

- 6.11 The implications of the Revised Proposed Development on the Socio-Economic assessment relate to:
- Decrease in residential provision of 10 homes
 - Change to the unit mix (decrease of 1 and 3 bed, increase of 2 and 4 bed)
 - Change to the tenure of some buildings
 - Change to the unit mix within each tenure (no 1 bed in Social Rent, no 3 bed in Shared Ownership)

Embedded Mitigation

6.12 There is no material change to the future baseline conditions as presented in the July 2024 ES.

POTENTIAL EFFECTS

Demolition and Construction

6.13 There are no material changes that will affect the previous assessment undertaken and therefore the July 2024 ES Socio-Economics chapter remains robust and valid.

Completed Development

Employment

6.14 There are no material changes that will affect the previous assessment undertaken and therefore the July 2024 ES Socio-Economics chapter remains robust and valid.

Housing Delivery

- 6.15 The Revised Proposed Development will deliver 867 new homes, ten fewer than previously assessed, equivalent to 36.8% of LBS annual London Plan housing targets (2,355) and 3.7% of its total target over the Plan Period.
- 6.16 This is not a material change from the previous assessment undertaken and therefore the July 2024 ES Socio-Economics chapter remains robust and valid.

Population

6.17 The population living in the proposed new homes has been estimated using the GLA Population Yield Calculator. The results of both population and child yield calculations are presented in Table 6.2.

Table 6.2 Population

Variable	July 2024 Assessment	Revised Proposed Development
People living in new homes	1,862	1,799
GP Demand (Full Time Equivalent GP required)	1.03 (HUDU benchmark 1,800 patients per GP) 0.92 (London benchmark 2,034 patients per GP)	1.00 (HUDU benchmark 1,800 patients per GP) 0.88 (London benchmark 2,034 patients per GP)
Primary School Demand (places)	111	74
Primary School Forms of Entry (FE)	0.53	0.35
Secondary School Demand (places)	51	36
Secondary School Forms of Entry (FE)	0.34	0.24

Primary Healthcare

6.18 The Revised Proposed Development will house 1,799 people, 63 fewer than previously assessed. This is not a material change from the previous assessment undertaken and therefore the July 2024 ES Socio-Economics chapter remains robust and valid.

Education

6.19 The Revised Proposed Development will be home to 110 school aged children, 52 fewer than previously assessed. This is a material change from the previous assessment undertaken however the effect is assessed to be the same as the July 2024 ES Socio-Economics chapter i.e. the effect of the Proposed Development on primary and secondary education is assessed to be Negligible (not significant) at the local and borough levels respectively.

Additional Spending

6.20 The new homes in the Revised Proposed Development will generate £13.1 million annually in additional spending, £100,000 annually less than previously assessed. The additional spending by employees is expected to stay the same (£1.6m - £2.0m annually). This is not a material change from the previous assessment undertaken and therefore the July 2024 ES Socio-Economics chapter remains robust and valid.

Open Space and Playspace

6.21 Table 6.3 sets out the Revised Proposed Development’s playspace requirements based on the GLA’s Population Yield Calculator, against the provision for each age bracket. This shows that the Proposed Development will generate demand for 2,232sqm of playable space. The Proposed Development includes a 2,417sqm of playspace.

Table 6.3 Playspace Demand and Provision

Age Profile	Child Yield	GLA Model 2019 Requirement sqm	Proposed Development Provision sqm	Typology
Under 5 years	94	942	1,303	Doorstep Playable Space

Age Profile	Child Yield	GLA Model 2019 Requirement sqm	Proposed Development Provision sqm	Typology
5 – 11 years	74	739	904	Local Playable Space
12 – 18 years	55	551	210	Neighbourhood Playable Space
TOTAL	223	2,232	2,417	-

n.b numbers may not sum due to rounding.

6.22 In contrast to the July 2024 ES Socio-Economics chapter, the Revised Proposed Development will meet the overall total playspace requirements across the Proposed Development. This is a material improvement.

6.23 The Southwark Plan (2022) Policy P15 ‘Residential Design’¹ states: Flatted development must provide 50sqm of communal amenity space per residential block. The Policy goes on to say, “In circumstances where private and communal amenity space and facilities or child play space cannot be provided on site, this should be provided as private amenity space with the remaining amount added to the communal space requirement”. All private amenities meet or exceed the GLA requirement, including minimum balcony depth. All homes are provided with high quality private amenity spaces that have been designed in line with Southwark policy.

6.24 There are fifteen residential buildings so the requirement would be 750sqm. The Revised Proposed Development includes 3,955sqm of communal amenity space (in addition to private balconies/terraces and 51sqm than previously assessed), well in exceedance of the requirement.

6.25 The Proposed Development’s effect on open space (high sensitivity) and playspace (low sensitivity) is the same as July 2024 ES Socio-Economics - Minor Beneficial (not significant).

Crime

6.26 There are no material changes that will affect the previous assessment undertaken and therefore the July 2024 ES Socio-Economics chapter remains robust and valid.

MITIGATION, MONITORING AND RESIDUAL EFFECTS

Demolition and Construction Mitigation

6.27 The conclusions of the July 2024 ES Socio-Economics chapter remain robust and valid – no mitigation is required.

Completed Development Mitigation

- 6.28 The conclusions of the July 2024 ES Socio-Economics chapter remain robust and valid, these stated:
- 6.134 No significant adverse effect has been identified. No further mitigation is proposed so residual effects remain as assessed.
- 6.135 A Minor Adverse effect has been identified with respect to potential demand arising for primary healthcare. Primary healthcare provided by the NHS is funded by tax revenue as allocated to Primary Care Networks through Integrated Care Boards (ICB). ICB block funding for revenue spending is updated annually and services can therefore adjust to changes in population relatively quickly.
- 6.136 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.

¹ London Borough of Southwark, 2022. The Southwark Plan.

6.137 Without mitigation either through ICB funding mechanisms or other funding sources there would be a residual temporary Minor Adverse effect (not significant) at a local level for primary healthcare.

Residual Effects

6.29 All effects considered in the Socio-Economics assessment of the July 2024 ES remain unchanged and valid.

ASSESSMENT OF THE FUTURE ENVIRONMENT

Evolution of the Baseline

6.30 There is no material change to the evolved baseline conditions as presented in the July 2024 ES.

CUMULATIVE EFFECTS ASSESSMENT

Demolition and Construction

6.31 There are no material changes that will affect the previous assessment undertaken and therefore the July 2024 ES Socio-Economics chapter remains robust and valid.

Completed Development

6.32 There are no material changes that will affect the previous assessment undertaken and therefore the July 2024 ES Socio-Economics chapter remains robust and valid. In general, the scale of the impact has increased with the inclusion of additional schemes, but the conclusions have remained the same.

6.33 The non material changes to the cumulative schemes assessed is summarised as follows:

- Employment – should the identified cumulative schemes come forward, they will generate up to approximately 10,680 gross FTE jobs (noting there was a typographical error in the previous chapter which concluded this was 8,100 when it should have stated 8,460)
- Housing Delivery – the cumulative schemes and the Proposed Development are expected to bring forward approximately 25,000 homes.
- Demand for Social Infrastructure² – the cumulative schemes will accommodate approximately 30,300 residents in addition to the 1,800 expected within the Proposed Development.
- Additional Spending – it is estimated that the 25,000 new homes will generate approximately £380 million per year in household spending, and the additional employees will generate up to approximately £26 million per year in additional spending.

LIKELY SIGNIFICANT EFFECTS

6.34 The Revised Proposed Development does not affect the likely significant effects reported in the July 2024 Socio-Economic ES Chapter, meaning they remain robust and valid.

² Please note: If the cumulative developments are not subject to S106 agreements to mitigate impacts, CIL revenue would be available for the LPA to prioritise healthcare infrastructure. Any adverse effects on healthcare from housing development should be temporary given ICB funding allocation would adjust according to population.

Chapter 7: Traffic and Transport

INTRODUCTION

7.1 The Traffic and Transport Chapter of the July 2024 ES (ES Chapter 7) has been reviewed in the context of the Revised Proposed Development to determine if the conclusions of this assessment remain valid. In addition, consideration has been given to any updates / changes to baseline, policy and methodology.

CONSULTATION SINCE THE JULY 2024 ES

7.2 An ES Review was provided by LUC in November 2024 (Review report being dated October 2024). There were no clarifications requested on the Traffic and Transport chapter.

7.3 Comments were also provided by London Borough of Southwark (LBS) and Greater London Authority (GLA) in October 2024 and Transport for London (TfL) in November 2024. Responses to the comments received have been provided within the Transport Assessment Addendum report. The comments received do not have a bearing on the conclusions of this chapter and the potential for likely significant effects previously assessed and presented within the July 2024 ES remains robust.

LEGISLATION, PLANNING POLICY AND GUIDANCE

7.4 The information as set out in the July 2024 ES remain unchanged in relations to legislation, policies and guidance.

ASSESSMENT METHODOLOGY

Defining the Baseline

7.5 The transport baseline conditions and methodology for determining the baseline conditions remains the same as presented in the July 2024 ES.

Impact Assessment Methodology

7.6 There are no changes to the assessment methodology set out within the July 2024 ES Chapter 7: Traffic and Transport. Consequently, the assessment methodology and significance criteria stated in the July 2024 ES Traffic and Transport Chapter remains applicable and valid.

Methodology For Defining Effects

Receptors And Receptor Sensitivity

7.7 No amendments have been made to the receptors or their sensitivity considered in the July 2024 ES Traffic and Transport Chapter

Magnitude of Impact

7.8 No amendments have been made to the method to determine magnitude of impact and it remains the same as considered in the July 2024 ES Traffic and Transport Chapter.

Defining the Effect

7.9 No amendments have been made to the method used for defining the effects and it remains the same as considered in the July 2024 ES Traffic and Transport Chapter.

Categorising Likely Significant Effects

7.10 No amendments have been made to the categorisation of likely significant effects and it remains the same as considered in the July 2024 ES Traffic and Transport Chapter.

BASELINE CONDITIONS

Current Baseline Conditions

7.11 There is no material change to the baseline conditions as presented within the July 2024 ES.

IMPLICATIONS OF THE REVISED PROPOSED DEVELOPMENT

7.12 Based in the information provided by the Applicant, the revised proposals will not impact the number of vehicular movements associated with the construction phase. The revised proposals reduces the number of residential dwellings on-site from 877 to 867 (10 fewer homes). However, given the car-free nature of the scheme and the small change in unit numbers, the revised proposals will not materially change the number of vehicular and person movements associated with the development and therefore implications of the Revised Proposed Development on the Traffic and Transport assessments is not material.

Embedded Mitigation

7.13 There is no material change to the future baseline conditions as presented in the July 2024 ES.

POTENTIAL EFFECTS

Demolition and Construction

7.14 There are no changes that will affect the previous assessment undertaken and therefore the conclusions presented within the July 2024 ES Chapter 7: Traffic and Transport remains robust and valid.

Completed Development

7.15 The person trips by mode for the revised completed development are outlined in Table 7.1.

Table 7.1 Net Change in Travel Demand from the revised Completed Proposed Development						
Mode	AM Peak			PM Peak		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Total People	59	353	412	109	66	175
Pedestrians	29	66	95	59	48	106
Bus	52	118	168	155	128	283
Rail	25	177	203	84	62	145
Cyclists	7	23	30	19	15	35
Car Drivers	-49	-33	-82	-165	-150	-315
Motorcycles	0	0	0	0	0	0
Car Passengers	-7	-1	-8	-48	-42	-91
Taxi	3	3	6	6	6	12

7.16 The net change in travel demand compared to those presented in the July 2024 assessment are outlined in Table 7.2.

Table 7.2 Net Change in Travel Demand compared to the July 2024 ES chapter assessment

Mode	AM Peak			PM Peak		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Total People	-3	-5	-8	-3	-4	-7
Pedestrians	0	-1	-1	0	0	-2
Bus	-1	-2	-3	-1	-2	-3
Rail	-1	-2	-3	-1	-1	-2
Cyclists	0	0	0	0	-1	0
Car Drivers	0	0	0	0	0	0
Motorcycles	0	0	0	0	0	0
Car Passengers	0	0	0	0	0	0
Taxi	0	0	0	0	0	0

7.17 As shown in Table 7.2, there will be fewer person trips due to the revised proposals. The changes in trip numbers are not material and would not affect the assessment or conclusions and therefore the July 2024 ES Traffic and Transport chapter remains robust and valid.

MITIGATION, MONITORING AND RESIDUAL EFFECTS

Demolition and Construction Mitigation

7.18 The mitigation measure and residual effects remain the same, and therefore the conclusions of the July 2024 ES Traffic and Transport chapter remains robust and valid.

Completed Development Mitigation

7.19 The mitigation measure and residual effects remain the same, and therefore the conclusions of the July 2024 ES Traffic and Transport chapter remains robust and valid.

Residual Effects

7.20 The residual effects presented within ES Chapter 7: Traffic and Transport of the July 2024 ES remain unchanged and valid.

ASSESSMENT OF THE FUTURE ENVIRONMENT

Evolution of the Baseline

7.21 There is no change to the evolved baseline conditions as presented in the July 2024 ES.

Future Baseline Conditions

7.22 Following review and consideration of the revised list of cumulative schemes, there is no material change to the future baseline conditions as presented in the July 2024 ES.

CLIMATE CHANGE

7.23 The impacts of climate change discussed in relation to Traffic and Transport are not affected by the Revised Proposed Development.

CUMULATIVE EFFECTS ASSESSMENT

Demolition and Construction

7.24 There is no material change to the cumulative effects assessment during the demolition and construction stage presented in the July 2024 ES.

Completed Development

7.25 There is no material change to the cumulative effects assessment following the completion of the development presented in the July 2024 ES.

LIKELY SIGNIFICANT EFFECTS

7.26 The likely significant effects remain the same, and therefore the conclusions presented within the July 2024 ES Chapter 7: Traffic and Transport remains robust and valid.

Chapter 8: Air Quality

INTRODUCTION

8.1 The Air Quality Chapter of the July 2024 ES has been reviewed in the context of the Revised Proposed Development to determine if the conclusions of this assessment remain valid. In addition, consideration has been given to any updates / changes to baseline, policy and methodology and consultation comments.

CONSULTATION SINCE THE JULY 2024 ES

8.2 An ES Review was provided by LUC in November 2024 (Review report being dated October 2024), responses to the clarifications raised in LUC's ES Review are presented in Table 8.1 below.

Table 8.1 ES Review Response Table

Clarification / Potential Regulation 25	Response
Clarification Point (AQ1) Clarification as to whether emissions from ventilation exhaust from the proposed basement vehicle parking have been included in the assessment modelling.	The emissions from the ventilation exhaust, from the proposed basement vehicle parking, were not included within the modelling assessment undertaken as part of the Air Quality Chapter of the July 2024 ES. ME-Engineers, the appointed mechanical engineers for the scheme, also confirmed that the ventilation exhaust of the underground car park will be located at the northeastern side of the Proposed Development, at more than 20 m from the nearest existing sensitive receptor. According to the IAQM guidance¹, no further assessment is therefore required. In contrast, there is sensitive exposure for the proposed residential units within 20 m of the ventilation exhaust, which are located within the same building (Block L) two floors above. A monitoring survey, using passive diffusion tubes, was undertaken as part of the Air Quality Chapter of the July 2024 ES (Section 'Baseline Conditions', subsection 'On-Site NO₂ Monitoring') and one of the sites ('DT4') was located approximately 15 m from the ventilation exhaust's location. The 2022 bias adjusted and annualised nitrogen dioxide concentration at this location was 29.0 µg/m³, which can be assumed to be representative of conditions at the northeastern façade of Block L. As such, there is a significant headroom in concentrations before an exceedance of the objective of 40 µg/m³ is expected to occur. Since there are no other significant emission sources in the vicinity, and due to the high headroom in concentrations, it is highly unlikely that any exceedances of the objectives would be observed at the proposed residential units.
Potential Regulation 25 Point (AQ2) Inclusion of judgement on how representative the 2022 monitoring data are of a post-pandemic baseline.	

¹ IAQM (2017) Land-Use Planning & Development Control: Planning for Air Quality.
² This comprises the latest part of the series in Gellatly, R. and Marner, B. (2020) Nitrogen Oxides Trends in the UK 2013 to 2019; Gellatly, R., and Marner, B. (2020) The Effect of COVID-19 Social and Travel Restrictions on UK Air Quality; Gellatly, R., Marner, B., Liska, T. and Laxen, D. (2020) The Effect of COVID-19 Social and Travel Restrictions on UK Air Quality – 06 April Update; Liska, T., Gellatly, G., Laxen, D., and Marner,

Clarification / Potential Regulation 25	Response
	The graph shows the mean monthly 'de-weathered' nitrogen dioxide concentrations from 2016 to 2024, at 99 roadside monitoring stations with sufficient data capture across the UK². The vertical grey bar shows the first Covid-19 lockdown. The data during 2022 are shown to have returned to a similar pattern as pre-Covid conditions, with the expected downward trend in concentrations due to the update of cleaner vehicles and the implementation of more stringent legislation. This is also strengthened from the monitoring results presented in the Council's latest Annual Status Report (ASR) for 2023³, where the 2023 concentrations have shown an overall reduction from 2022.

8.3 Comments were also provided by the Environmental Protection Officer at Southwark Council in September 2024. Responses to these comments are presented in Table 8.2 below.

Table 8.2 Responses to Consultee Comments

Comment	Response
Prior to occupation this development shall achieve full compliance with the air quality assessment mitigation measures as detailed in Environmental Statement: Volume 3 – Appendix: Air Quality. Reason To protect future occupiers from poor external air quality in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P65 (Improving air quality), and the National Planning Policy Framework 2021.	We are in agreement with this condition. However, there is no mitigation required to protect future occupiers, so the reason for the condition is not relevant. The proposed mitigation in the Air Quality Appendix ('A8 – Construction Mitigation') relates to control of emissions during the construction phase.

8.4 In addition, comments were also provided by the Greater London Authority (GLA) in September 2024. Responses to these comments are presented in Table 8.3 below.

Table 8.3 Responses to GLA Comments

Comment	Response
London Plan Policy SI1 states that development proposals should not lead to deterioration of existing poor air quality; should not create any new areas that exceed air quality limits or delay compliance in areas that are in exceedance of legal limits; and should not create unacceptable risk of high levels of exposure to poor air quality. Development proposals must be at least Air Quality Neutral and large-scale development proposals should provide an air quality positive statement.	No response required.
An Air Quality Assessment was provided with the application. The assessment included a quantitative assessment of construction phase traffic. Operational phase traffic was scoped out. A Dust Risk Assessment, Air Quality Neutral Assessment and Air Quality Positive Assessment were also included. The report was considered of sufficient technical quality. Comments as follows:	No response required.
A dispersion model of construction phase traffic was undertaken. The results indicated any significant effects would be negligible. It was noted that no new proposed receptors were modelled as part of the assessment. As there is a residential component to the development, it would be assumed that new receptors representing this section would be modelled for site suitability.	Paragraphs 8.106 and 8.107, as well as the Site Suitability section of the Air Quality ES Chapter, detail the assessment undertaken for considering air quality conditions within the proposed development. Any new receptors within the development will be located further from the affected roads than the existing receptors and thus impacts will be smaller. The modelled concentrations were below the relevant air quality objectives at all existing receptors; therefore, it is expected that concentrations will also be below the objectives at new receptor locations within the site.
A Dust Risk Assessment was undertaken using the correct guidance. The risk level for the site was determined to be High. Appropriate mitigation was included.	Comment noted.

B. (2020) The Effect of COVID-19 Social and Travel Restrictions on UK Air Quality – November Update; Pearce, H., Marner, B., and Moorcroft S. (2022) Trends in UK NOx and NO2 Concentrations through the COVID-19 Pandemic: January 2022; Pearce, H., Marner, B., and Moorcroft S. (2022) Trends in UK NOx and NO2 Concentrations through the COVID-19 Pandemic: May 2022 Update
³ LBS (2024) Air Quality Annual Status Report for 2023.

Comment	Response
An Air Quality Neutral Assessment was undertaken. It has been determined that the proposed development is air quality neutral for both building and transport emissions. The development can be assumed neutral on building emissions as it uses ASHPs as its energy strategy. The residential component of the development is considered car free. However there is car parking as part of the commercial element of the development. The fact that there will be less parking spaces than the previous land use is provided as justification for the development being neutral on transport emissions. It would be expected that the development trips would be compared against the relevant benchmark regardless of the previous land use.	Paragraph 2.2.1 of GLA's Air Quality Neutral guidance states that "Developments, including major developments, that do not include any additional emissions sources are assumed to be Air Quality Neutral and to meet the Air Quality Neutral benchmarks...This would include, for example, developments that have no additional motor vehicle parking, do not lead to an increase in motor vehicle movements...". As the development will reduce the amount of on-site car parking spaces and will lead to a reduction in the vehicular movements generated, it can be assumed to be Air Quality Neutral and no comparison with benchmarks is required.
An Air Quality Positive Assessment was included with the report. The AQP statement was brief and did not include measures which went much past what would be expected as part of the design scope. There was also no evidence provided of the involvement of air quality in the early stages of the design process.	Air quality was taken into consideration at an early stage during the design process. A three-month monitoring survey using passive diffusion tubes at six locations around the application site boundary was undertaken between September and November 2022. These sites were located between 0.5 m and 5.0 m from their respective roads' kerbsides. The monitoring was carried out at an early design stage in order to identify the influence of the Peckham Bus Station, and the surrounding busy roads on local air quality. The monitoring also investigated the risk of exceedance of the objectives across the site. The results of this monitoring survey showed all monitoring sites measured concentrations below the annual mean nitrogen dioxide objective. The Revised Proposed Development has incorporated a number of embedded design measures, to minimise the impact on local air quality, as well as the impacts on the future residents and users. The closest sensitive receptors within the Proposed Development to Peckham Bus Station are located approximately 7.5 m away and on the first floor (Block L) and the closest receptor to Hanover Park, south of the site (Block J2), are over 10 m away at ground floor level. As such, the scheme design is such that the most sensitive uses (i.e., residential) are located further away from the nearest sources of pollution (i.e., Peckham Bus Station and adjacent roads). In addition, the Revised Proposed Development has also provided minimal residential car parking, active electric vehicle charging points, Air-Source Heat Pumps and Water-Source Heat Pumps, supplemented by photovoltaic panels, to reduce its emissions.
The development includes backup generators. It is stated in the report that around 1 hour of annual testing is anticipated. It should be noted that backup generators should not be operational for more than 50 hours annually, including testing and emergency supply. A condition has been added to this effect.	Comment noted.

8.5 Lastly, Transport for London (TfL) provided one comment following the review of the Air Quality ES Chapter of the July 2024 ES. A response to this comment is presented in Table 8.4.

Table 8.4 Response to TfL Comment

Comment	Response
Noise and Air Quality We are concerned about the design of the building adjacent to the bus station and its proximity to bus operations in terms of 24/7 noise impact from the latter on the new residents, for example reversing buses. It has not been demonstrated that suitable noise mitigation is to be provided nor indeed air quality mitigation. Further information is required to demonstrate alignment with Policy D13 'Agent of Change'	As part of the air quality assessment a three-month monitoring survey was undertaken in 2022 using passive diffusion tubes at six locations around the site boundary. Three tubes were located between Peckham Bus Station and the proposed scheme. The results showed that the highest measured concentration at these three locations was 29.0 µg/m³ measured at site 'DT4'. This concentration is well below the annual mean nitrogen dioxide objective (40 µg/m³). In addition, the closest building façade of the scheme (Block L) to the Peckham Bus Station is approximately 7.5 m away, compared to this monitoring site that is 4.5m away, and relevant exposure (i.e., sensitive receptors to the objectives) starts at first floor and above. Taking into account the monitoring site measuring a concentration well below the air quality objective and the relative distances to Peckham Bus Station, it is highly unlikely that there will be an exceedance observed at the façades of the scheme overlooking the bus station and future residents are expected to experience acceptable air quality. For the reasons stated above, it is not considered necessary, from an air quality perspective, to recommend any additional mitigation to be implemented within the design of the scheme.

LEGISLATION, PLANNING POLICY AND GUIDANCE

- 8.6 The Chief Planner has recently written to all Local Authorities providing interim guidance on how to consider the air quality targets for PM2.5 in planning decisions⁴. This requires applicants to consider how exposure to PM2.5 has been considered and what actions and/or mitigations have been considered to reduce PM2.5 exposure and emissions. PM2.5 exposure is considered within the Site Suitability of the Air Quality Chapter of the July 2024 ES, whilst the Embedded Mitigation measures will reduce PM2.5 emissions. Therefore, no changes to the July 2024 ES are necessary in response to this Interim Guidance.
- 8.7 There are no other changes to the published legislation, policy and guidance set out within the Air Quality Chapter of the July 2024 ES. Consequently, the legislation, policy and guidance section stated in the July 2024 ES remain applicable and valid.

ASSESSMENT METHODOLOGY

Defining the Baseline

- 8.8 The method for determining the baseline conditions remain the same as presented within the July 2024 ES. The information provided in Table 8.1 demonstrates that the 2022 monitoring data are representative of a post-pandemic baseline.

Impact Assessment Methodology

- 8.9 There are no changes to the assessment methodology set out within the July 2024 ES Air Quality Chapter. Consequently, the assessment methodology and significance criteria stated in the Air Quality July 2024 ES remain applicable and valid.

⁴ <https://uk-air.defra.gov.uk/pm25targets/planning>

Methodology For Defining Effects

Receptors And Receptor Sensitivity

- 8.10 No amendments have been made to the receptors or their sensitivity considered in the July 2024 ES Air Quality Chapter.

Magnitude of Impact

- 8.11 No amendments have been made to the method to determine magnitude of impact and it remains the same as considered in the July 2024 ES Air Quality Chapter.

Defining the Effect

- 8.12 No amendments have been made to the method used for defining the effects and it remains the same as considered in the July 2024 ES Air Quality Chapter.

Categorising Likely Significant Effects

- 8.13 No amendments have been made to the categorisation of likely significant effects and it remains the same as considered in the July 2024 ES Air Quality Chapter.

BASELINE CONDITIONS

Current Baseline Conditions

- 8.14 The Air Quality Chapter of the July 2024 ES presented the local air quality monitoring data, from monitoring units deployed by the London Borough of Southwark (LBS), up to the year of 2022, with data taken from the 2022 Air Quality Annual Status Report (ASR)⁵. However, since completion of the July 2024 ES a new ASR³ has been published, containing the monitoring information for the year 2023. The ASR demonstrates a downward trend in concentrations from 2022 to 2023 at the relevant nearby monitoring sites presented in the July 2024 Air Quality ES. The automatic monitoring stations 'SWKB' and 'SWK5' showed a 4% and 7% decrease, respectively, while the diffusion tube monitoring sites showed a decrease in concentrations ranging from 9% to 22%.

IMPLICATIONS OF THE REVISED PROPOSED DEVELOPMENT

- 8.15 The Revised Proposed Development has the potential to impact on the findings of the Air Quality Chapter of the July 2024 ES. The previous assessment considered:
- The impacts of the Proposed Development on local air quality in terms of dust and particulate matter emissions during the demolition and subsequent construction works;
 - The emissions from road traffic generated by the construction works and the completed and occupied development;
 - The air quality impacts of existing, and proposed, sources on future users and residents of the Proposed Development;
 - The emissions from testing and maintenance of the two emergency diesel generators and two diesel sprinklers; and
 - The air quality neutrality of the Proposed Development.

Summary of the Findings of the Air Quality July 2024 ES Chapter

- 8.16 An assessment of air quality impacts associated with emissions from the development-generated traffic during the construction phase of the Proposed Development was undertaken using atmospheric dispersion modelling software. The dispersion modelling found a 'negligible' change in NO₂, PM₁₀ and PM_{2.5} concentrations at the existing sensitive receptors as a result of the Proposed Development and that the predicted concentrations were below the air quality objectives in the future assessment year (2028). In addition, the assessment also assessed qualitatively the air quality impacts from the operational traffic of the Proposed Development, and it was also demonstrated that the pollutant concentrations for relevant future residents and users of the Proposed Development would be below the respective air quality objectives, and thus air quality conditions would be acceptable.
- 8.17 A qualitative assessment of the dust and particulate matter emissions during the construction period was also undertaken to identify suitable best practice mitigation measures to reduce dust emissions such that the overall effect would be 'not significant'. Furthermore, the Proposed Development was assessed as air quality neutral as it would lead to a significant reduction in on-site car parking spaces, compared to the existing use, and heat and hot water for the development would be provided via an all-electric system comprising Air-Source Heat Pumps (ASHPs) and Water-Source Heat Pumps (WSHPs).
- 8.18 Lastly, a qualitative assessment of the air quality impacts associated with the emissions from the two life-safety generators and two diesel sprinkler pumps was undertaken. The plant would be required to be tested for approximately five minutes per month, amounting to one hour of annual testing. In addition, the exhaust flues would be terminating on the tallest parts of their respective buildings, unimpeded, at locations with the best possible pollutant dispersion environments. The assessment demonstrated that due to the limited testing regime and locations of flues, the impacts from the plant's emissions would be negligible.

Embedded Mitigation

- 8.19 There is no material change to the future baseline conditions as presented in the July 2024 ES.

POTENTIAL EFFECTS

Demolition and Construction

- 8.20 There are no changes that will affect the previous assessment undertaken and therefore the July 2024 ES Air Quality chapter remains robust and valid.

Completed Development

- 8.21 The Revised Proposed Development will lead to a slight decrease in the overall number of residential units proposed, from 877 to 867 units. Arup, the appointed transport consultant for the scheme, have confirmed that this slight reduction in residential units (10 in total) will not materially change the operational traffic of the Revised Proposed Development.
- 8.22 In addition, as no changes are proposed to the energy strategy and the Revised Proposed Development will still lead to a significant reduction in on-site car parking spaces, the previous Air Quality Neutral assessment undertaken as part of the July 2024 ES remains valid, and the conclusions remain the same, i.e., that the Revised Proposed Development is air quality neutral both in terms of building and transport emissions.
- 8.23 Regarding the two life-safety generators, and two diesel sprinkler systems proposed, the Revised Proposed Development will neither alter the exhaust locations of these plant nor their testing regime as previously stated within the Air Quality Chapter of the July 2024 ES.

⁵ LBS (2023) Air Quality Annual Status Report for 2022.

- 8.24 The proposed changes to the completed development will, therefore, not affect the air quality assessment so the conclusions of the Air Quality Chapter of the July 2024 ES remain robust and valid.

MITIGATION, MONITORING AND RESIDUAL EFFECTS

Demolition and Construction Mitigation

- 8.25 The mitigation measures and residual effects remain the same, and therefore the conclusions of the July 2024 ES Air Quality chapter remain robust and valid.

Completed Development Mitigation

- 8.26 The mitigation measures and residual effects remain the same, and therefore the conclusions of the July 2024 ES Air Quality chapter remain robust and valid.

SITE SUITABILITY

- 8.27 The Revised Proposed Development will not affect the conclusions of the Air Quality Chapter of the July 2024 ES in relation to site suitability, and as such the July 2024 ES remain robust and valid.

ASSESSMENT OF THE FUTURE ENVIRONMENT

Evolution of the Baseline

- 8.28 There is no material change to the evolved baseline conditions as presented in the July 2024 ES.

Future Baseline Conditions

- 8.29 There is no material change to the future baseline conditions as presented in the July 2024 ES.

CLIMATE CHANGE

- 8.30 The impacts of climate change discussed in relation to air quality are not affected by the Revised Proposed Development.

CUMULATIVE EFFECTS ASSESSMENT

- 8.31 Since the preparation of the Air Quality Chapter of the July 2024 ES, there have been five new developments added to the cumulative list; however, they are all more than 1 km away from the Revised Proposed Development. As such, they are expected to have a negligible contribution to the Cumulative Effects Assessment undertaken as part of the July 2024 ES and, therefore, the conclusions in the Air Quality Chapter remain robust and valid.

LIKELY SIGNIFICANT EFFECTS

- 8.32 The Revised Proposed Development will not affect the likely significant effects in the Air Quality Chapter of the July 2024 ES, and as such, the likely significant effects remain the same and the July 2024 ES remains robust and valid.

Chapter 9: Noise and Vibration

INTRODUCTION

- 9.1 The Noise and Vibration Chapter of the July 2024 ES (Chapter 9) has been reviewed in the context of the Revised Proposed Development to determine if the conclusions of this assessment remain valid. In addition, consideration has been given to any updates / changes to baseline, policy and methodology.

CONSULTATION SINCE THE JULY 2024 ES

- 9.2 An ES Review was provided by LUC in November 2024 (Review report being dated October 2024). No clarifications requests were raised with regard to the July 2024 ES noise and vibration chapter.
- 9.3 Transport for London (TfL) requested the following clarification in consultation:
“We are concerned about the design of the building adjacent to the bus station and its proximity to bus operations in terms of 24/7 noise impact from the latter on the new residents, for example reversing buses. It has not been demonstrated that suitable noise mitigation is to be provided nor indeed air quality mitigation. Further information is required to demonstrate alignment with Policy D13 ‘Agent of Change’.”
- 9.4 A detailed environmental noise survey was undertaken at the site in 2022 and included specific consideration for the bus station.
- 9.5 Based on the survey results and 3D noise modelling, a sound insulation specification for the residential façades was developed and is specified in the July 2024 ES. This includes outline specifications for glazing and ventilation elements with a view of controlling external noise intrusion such that internal ambient noise levels within the proposed habitable rooms are in line with the requirements of London Borough of Southwark. The outline specification for the northern façade of Block L close to the bus station is the highest (in terms of acoustic performance) across the scheme in consideration of the noise from manoeuvring buses within the bus station.
- 9.6 Detailed octave band specifications will be developed at the detailed design to further ensure the internal conditions are met.

LEGISLATION, PLANNING POLICY AND GUIDANCE

- 9.7 The legislation, planning policy and guidance stated in the July 2024 ES noise and vibration chapter remain applicable and valid.

ASSESSMENT METHODOLOGY

Defining the Baseline

- 9.8 The method for determining the baseline conditions remain as presented within the July 2024 ES noise and vibration chapter.

Impact Assessment Methodology

- 9.9 There are no changes to the assessment methodology set out within the July 2024 ES noise and vibration chapter. Consequently, the assessment methodology and significance criteria stated in the July 2024 ES noise and vibration chapter remains applicable and valid.

Methodology For Defining Effects

Receptors And Receptor Sensitivity

- 9.10 No amendments have been made to the receptors or their sensitivity considered in the July 2024 ES noise and vibration chapter.

Magnitude of Impact

- 9.11 No amendments have been made to the method to determine magnitude of impact and it remains the same as considered in the July 2024 ES noise and vibration chapter.

Defining the Effect

- 9.12 No amendments have been made to the method used for defining the effects and it remains the same as considered in the July 2024 ES noise and vibration chapter.

Categorising Likely Significant Effects

- 9.13 No amendments have been made to the categorisation of likely significant effects and it remains the same as considered in the July 2024 ES noise and vibration chapter.

BASELINE CONDITIONS

Current Baseline Conditions

- 9.14 There is no material change to the baseline conditions as presented within the July 2024 ES noise and vibration chapter.

IMPLICATIONS OF THE REVISED PROPOSED DEVELOPMENT

- 9.15 There are no implications of the Revised Proposed Development on the noise and vibration assessments.
- 9.16 The demolition and construction programme remains as presented in the July 2024 ES and therefore the demolition and construction noise and vibration assessment presented in the July 2024 ES noise and vibration chapter remain applicable and valid.
- 9.17 The applicants transport consultant, Arup, have confirmed that the Revised Proposed Development has no material change on the operational traffic flow data. The operational road traffic noise assessment presented in the July 2024 ES noise and vibration chapter therefore remains applicable and valid.

Embedded Mitigation

- 9.18 There is no material change to the embedded mitigation as presented in the July 2024 ES noise and vibration chapter.

POTENTIAL EFFECTS

Demolition and Construction

- 9.19 There are no changes that will affect the previous assessment undertaken for demolition and construction noise and vibration and therefore the July 2024 ES noise and vibration chapter remains robust and valid.

Completed Development

- 9.20 There are no changes that will affect the previous assessments undertaken for the completed development and therefore the July 2024 ES noise and vibration chapter remains robust and valid.

MITIGATION, MONITORING AND RESIDUAL EFFECTS

Demolition and Construction Mitigation

- 9.21 The mitigation measures and residual effects for demolition and construction noise and vibration remain as presented in the July 2024 ES noise and vibration chapter, and therefore the conclusions remain robust and valid.

Completed Development Mitigation

- 9.22 The mitigation measures and residual effects for the completed development remain as presented in the July 2024 ES noise and vibration Chapter, and therefore the conclusions remain robust and valid.

SITE SUITABILITY

- 9.23 The Revised Proposed Development has no material change to the conclusions for site suitability presented in the July 2024 ES noise and vibration chapter.

ASSESSMENT OF THE FUTURE ENVIRONMENT

Evolution of the Baseline

- 9.24 There is no material change to the evolved baseline conditions as presented in the July 2024 ES.

Future Baseline Conditions

- 9.25 There is no material change to the future baseline conditions as presented in the July 2024 ES.

CLIMATE CHANGE

- 9.26 The impacts of climate change discussed in relation to noise and vibration are not affected by the Revised Proposed Development.

CUMULATIVE EFFECTS ASSESSMENT

Demolition and Construction

- 9.27 The additional cumulative schemes have been considered where relevant and there is no material change to the cumulative effects assessment for demolition and construction noise and vibration presented in the July 2024 ES noise and vibration chapter.

Completed Development

- 9.28 The additional cumulative schemes have been considered where relevant and there is no material change to the cumulative effects assessment for the completed development presented in the July 2024 ES noise and vibration chapter.

LIKELY SIGNIFICANT EFFECTS

- 9.29 The likely significant effects remain as presented in the July 2024 ES noise and vibration chapter (Chapter 9).

Chapter 10: Daylight, Sunlight and Overshadowing

INTRODUCTION

10.1 The Daylight, Sunlight and Overshadowing Chapter of the July 2024 ES (ES Chapter 10) has been reviewed in the context of the Revised Proposed Development to determine if the conclusions of this assessment remain valid. In addition, consideration has been given to any updates / changes to baseline, policy and methodology.

CONSULTATION SINCE THE JULY 2024 ES

10.2 An ES Review was provided by LUC in November 2024 (Review report being dated October 2024), responses to the clarifications raised in LUC's ES Review are presented in Table 10.1 below.

Table 10.1 ES Review Response Table

Requested Clarification / Potential Regulation 25	Response
Clarification Point (Ref: DSO1) Confirmation of determination of sensitive receptors, including any non-residential uses	Scope of sensitive receptors was determined with reference to the BRE 2022 guidelines as well as from site observation during a site visit, online mapping tools and using professional judgement as to which properties are likely to experience a noticeable change in light conditions, considering residential properties with habitable accommodation which could be affected due to distance from the Application Site. No non-domestic buildings have been identified as requiring assessment within a reasonable scope of the site. This is a standard and accepted method to determine sensitive receptors relevant for assessment. Specifically, no education or care facilities are identified.
Clarification Point (Ref: DSO2) How room uses quoted as providing mitigation (i.e. bedrooms) were established	40 Hanover Park: Room uses suggested from external observations. Subsequently, an internal floor plan has been obtained from Rightmove.com confirming the bedroom and living room uses referred to at paragraph 10.167. Uniform architecture of the building suggests that this layout for flat 40C, can be reliably replicated throughout the building. Copy of layout obtained online included in Appendix 10.1. 30-36 Hanover Park: Room uses suggested from external observations only at paragraph 10.177 within the July 2024 ES chapter. Floor plans not available in public domain and no access obtained as is usual practice. 28 Hanover Park: Room uses suggested from external observations only at paragraph 10.186 within the July 2024 ES chapter. Floor plans not available in public domain and no access obtained as is usual practice. 26 Hanover Park: Room uses suggested from external observations only at paragraph 10.196 within the July 2024 ES chapter. Floor plans not available in public domain and no access obtained as is usual practice. 24 Hanover Park: Room uses suggested from external observations only at paragraph 10.206 within the July 2024 ES chapter. Floor plans not available in public domain and no access obtained as is usual practice. 22 Hanover Park: Room uses suggested from external observations only at paragraph 10.214 within the July 2024 ES chapter. Floor plans not available in public domain and no access obtained as is usual practice. 20 Hanover Park: No room uses suggested in ES chapter (relevant paragraphs 10.220-10.228 within the July 2024 ES chapter).
Clarification Point (Ref: DSO3) How short-term tenure quoted as providing mitigation was established at 81 Hanover Park.	Information obtained from online searches, including: Case officer report under Southwark planning ref: 10/AP/1240, confirms use of building as 'there are 74 flats which are let as key worker accommodation' – copy provided in Appendix 10.2. 202222/23 Clarion Housing Key Worker Scheme Rents Schedule (Kings College Hospital NHS Foundation Trust) quoting 81 Hanover Park and size of available units. Copy provided in Appendix 10.3.
Clarification Point (Ref: DSO4) Confirmation of no overshadowing (two hours sun on ground) sensitive receptor to the rear of 85 Peckham High St.	Cannot identify 85 Peckham High Street address but assume that the external space in question is the rear of no.86, Peckham High Street. This property is retail at ground floor and has three flats on floors above. There is no evidence of a garden serving the residential uses on the online Southwark planning portal and no site observations of a garden. This space is assumed to be associated with the commercial unit at ground floor. It appears overgrown and unused from online mapping information available. As is usual practice, no access has been obtained to this property, so this is not confirmed by way of a site visit. Based on the information available, it is assumed this is not a garden.

Requested Clarification / Potential Regulation 25	Response
Potential Regulation 25 Point (Ref: 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.	For all properties identified, including 18a & 18b Rye Lane, 14-16 Rye Lane, 12-12a Rye Lane, 4 Central Buildings, 98 Peckham High Street, 104 Peckham High Street, 106 Peckham High Street, 108 Peckham High Street, 110 Peckham High Street and 112 Peckham High Street. Overall effect is concluded as minor adverse based upon retained VSC values in excess of the alternative target value of 15%, indicating that sufficient daylight will continue to reach the façade of these buildings in the proposed scenario. An alternative target value of 15% VSC is applied for neighbouring properties to this site as an appropriate benchmark for the urban setting and scale for development. It is accepted practice to consider an alternative, retained daylight value for development within urban settings with existing neighbours in close proximity and a clear and low-rise existing site condition. When alternative target values are considered the BRE recommends that 'VSC is generally recommended as the appropriate parameter to use.' (BRE. Appendix F, para. F7). Whenever alternative targets are adopted it is inevitable that you will get higher proportional reductions in both VSC and NSL, particularly when you develop a low-rise site. Therefore, since NSL does not have a concept of a retained value, it is inevitable that there will be larger NSL reductions and these should be given little weight.

LEGISLATION, PLANNING POLICY AND GUIDANCE

10.3 There are no changes of note relevant to Daylight, Sunlight & Overshadowing matters considered in the July 2024 ES Chapter (ES Chapter 10).

ASSESSMENT METHODOLOGY

Defining the Baseline

10.4 The method for determining the baseline conditions remain the same as presented within the July 2024 ES.

Impact Assessment Methodology

10.5 There are no changes to the assessment methodology set out within the July 2024 ES Daylight, Sunlight & Overshadowing Chapter. Consequently, the assessment methodology and significance criteria stated in the Daylight, Sunlight & Overshadowing July 2024 ES Chapter remains applicable and valid.

Methodology For Defining Effects

Receptors And Receptor Sensitivity

10.6 No amendments have been made to the receptors or their sensitivity considered in the July 2024 ES Daylight, Sunlight & Overshadowing Chapter.

Magnitude of Impact

10.7 No amendments have been made to the method to determine magnitude of impact and it remains the same as considered in the July 2024 ES Daylight, Sunlight & Overshadowing Chapter.

Defining the Effect

10.8 No amendments have been made to the method used for defining the effects and it remains the same as considered in the July 2024 ES Daylight, Sunlight & Overshadowing Chapter.

Categorising Likely Significant Effects

- 10.9 No amendments have been made to the categorisation of likely significant effects and it remains the same as considered in the July 2024 ES Daylight, Sunlight & Overshadowing Chapter.

BASELINE CONDITIONS

Current Baseline Conditions

- 10.10 The baseline conditions remain the same as presented within the July 2024 ES.

IMPLICATIONS OF THE REVISED PROPOSED DEVELOPMENT

- 10.11 There are no implications of the Revised Proposed Development on Daylight, Sunlight & Overshadowing assessment due to no material change to the external building envelopes of each proposed block.

Embedded Mitigation

- 10.12 There is no material change to the embedded mitigation section as presented in the July 2024 ES.

POTENTIAL EFFECTS

Demolition and Construction

- 10.13 There are no changes that will affect the previous assessment undertaken and therefore the July 2024 ES Chapter 10: Daylight, Sunlight & Overshadowing remains robust and valid.

Completed Development

- 10.14 The proposed changes will not affect the Daylight, Sunlight & Overshadowing assessment and therefore the July 2024 ES chapter remains robust and valid.

MITIGATION, MONITORING AND RESIDUAL EFFECTS

Demolition and Construction Mitigation

- 10.15 The mitigation measure and residual effects remain the same, and therefore the conclusions of the July 2024 ES Daylight, Sunlight & Overshadowing chapter remains robust and valid.

Completed Development Mitigation

- 10.16 The mitigation measure and residual effects remain the same, and therefore the conclusions of the July 2024 ES Daylight, Sunlight & Overshadowing chapter remains robust and valid.

Residual Effects

- 10.17 All residual effects as previously presented within the July 2024 ES Chapter 10: Daylight, Sunlight & Overshadowing remain unchanged and are valid.

ASSESSMENT OF THE FUTURE ENVIRONMENT

Evolution of the Baseline

- 10.18 The evolved baseline conditions remain as presented in the July 2024 ES.

Future Baseline Conditions

- 10.19 The future baseline conditions remain as presented within the July 2024 ES.

CLIMATE CHANGE

- 10.20 The impacts of climate change discussed in relation to Daylight, Sunlight & Overshadowing are not affected by the Revised Proposed Development.

CUMULATIVE EFFECTS ASSESSMENT

Demolition and Construction

- 10.21 The additional cumulative schemes have been considered and there are no amendments to the assessment presented in the July 2024 ES.

Completed Development

- 10.22 The additional cumulative schemes have been considered and there are no amendments to the assessment presented in the July 2024 ES.

LIKELY SIGNIFICANT EFFECTS

- 10.23 The likely significant effects remain the same, and therefore the July 2024 ES remains robust and valid.

Chapter 11: Wind Microclimate

INTRODUCTION

11.1 The Wind Microclimate Chapter 11 of the July 2024 ES has been reviewed in the context of the Revised Proposed Development to determine if the conclusions of this assessment remain valid. In addition, consideration has been given to any updates / changes to baseline, policy and methodology.

CONSULTATION SINCE THE JULY 2024 ES

11.2 An ES Review was provided by LUC in November 2024 (dated October 2024), responses to the clarifications raised in LUC’s ES Review are presented in Table 11.1 below.

Table 11.1 ES Review Response Table

Requested Clarification / Potential Regulation 25	Response
Clarification Point (Ref: 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.	This has been added to the references list in the revised ES Addendum: Appendix: Wind Microclimate – Annex 1 for clarity.
Clarification Point (Ref: WM2) There looks to have been a typographic error when referring to the number of years of processed wind data – please clarify.	The regional climate model uses combined data records from the airports referenced this represents a total of 136 years of data.
Clarification Point (Ref: 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.	150 Probes were initially installed on the model however due to a design change excluding a balcony and a broken pressure tap only 148 were used for the final analysis. The testing is considered robust.
Clarification Point (Ref: 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.	This has been added to the ES Addendum: Appendix: Wind Microclimate – Annex 1.
Clarification Point (Ref: 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?	This is not a requirement of the City of London wind microclimate guidelines and does not form part of the wind engineer’s standard assessment.
Clarification Point (Ref: 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?	Scenario 3 represents the baseline testing case for the full proposed site configuration without any mitigation either soft or hard landscaping. Scenario 4 would supersede Scenario 3 given it contains on-site landscaping. It is therefore not required to define for Scenario 3 initial mitigation or additional mitigation.
Clarification Point (Ref: WM7) Note that there is a referencing error in Paragraph 11.125 of Document 1, and the correct reference should be provided.	This has been addressed in the ES Addendum: Appendix: Wind Microclimate – Annex 1
Potential Regulation 25 Point The implementation of balustrades and/or soft landscaping for each Scenario could require a Potential Regulation 25 Request	Additional CFD testing was conducted for the final design and landscaping plans which concluded that the implementation of balustrades, within the design, for each scenario will be appropriate for mitigating the adverse wind impacts. However, this additional testing did identify minor remaining areas of wind comfort issues where conditions are unsuitable for the intended use (on isolated areas on the balconies). Given the extensive testing which has occurred on mitigation measures it can be concluded by professional judgement that, with the inclusion of similar mitigation measures to the ones already tested in other areas (i.e. 1.5m Balustrades), the remaining uncomfortable areas will thereafter have acceptable conditions. This will be tested again on the final design, prior to occupation.

LEGISLATION, PLANNING POLICY AND GUIDANCE

11.3 The information as set out in the July 2024 ES remain unchanged in relation to legislation, policies and guidance.

ASSESSMENT METHODOLOGY

Defining the Baseline

11.4 The method for determining the baseline conditions remain the same as presented within the July 2024 ES.

Impact Assessment Methodology

11.5 There are no changes to the assessment methodology set out within the July 2024 ES Wind Microclimate Chapter. Consequently, the assessment methodology and significance criteria stated in the Wind Microclimate July 2024 ES and Wind Microclimate Chapter remains applicable and valid.

Methodology For Defining Effects

Receptors And Receptor Sensitivity

11.6 No amendments have been made to the receptors or their sensitivity considered in the July 2024 Wind Microclimate Chapter.

Magnitude of Impact

11.7 No amendments have been made to the method to determine magnitude of impact and it remains the same as considered in the July 2024 ES Wind Microclimate Chapter.

Defining the Effect

11.8 No amendments have been made to the method used for defining the effects and it remains the same as considered in the July 2024 ES Wind Microclimate Chapter.

Categorising Likely Significant Effects

11.9 No amendments have been made to the categorisation of likely significant effects and it remains the same as considered in the July 2024 ES Wind Microclimate Chapter.

BASELINE CONDITIONS

Current Baseline Conditions

11.10 The baseline conditions remain the same as presented within the July 2024 ES.

IMPLICATIONS OF THE REVISED PROPOSED DEVELOPMENT

11.11 Based on the information provided by the Applicant, the revised proposals will not impact the Wind Microclimate assessment associated within the construction phase.

11.12 The revised proposals reduce the number of residential dwellings on-site from 877 to 867 (10 fewer homes). This in turn changes some entrance and balcony locations and marginal changes to massing of some top floor set backs.

11.13 However, given the small change in unit numbers/massing, the revised proposals will not materially change the associated wind condition with the development and therefore implications of the Revised Proposed Development on the wind microclimate assessments are not material.

POTENTIAL EFFECTS

Demolition and Construction

11.14 There are no changes that will affect the previous assessment undertaken and therefore the July 2024 ES Wind Microclimate chapter remains robust and valid.

Completed Development

11.15 The proposed changes will not affect the assessment and therefore the July 2024 ES Wind Microclimate chapter remains robust and valid.

MITIGATION, MONITORING AND RESIDUAL EFFECTS

Demolition and Construction Mitigation

11.16 The Revised Proposed Development will not affect the mitigation and residual effects in the July 2024 ES Wind Microclimate chapter.

11.17 The mitigation measure and residual effects remain the same, and therefore the conclusions of the July 2024 ES Wind Microclimate chapter remain robust and valid.

Completed Development Mitigation

11.18 The Revised Proposed Development will affect the mitigation outline as presented in the July 2024 ES Wind Microclimate chapter.

11.19 New mitigation is set out below and will be incorporated into the Revised Proposed Development. This varies slightly to the mitigation which is presented within the previous July 2024 ES Wind Microclimate Chapter.

11.20 The residual effects vary herein as the July 2024 ES residual effects have been resolved with mitigation as outlined below in Figure 11.1 to Figure 11.5. The conclusions of the July 2024 ES Wind Microclimate chapter are materially unchanged and remain robust and valid. However, additional areas have been identified in the new CFD testing and therefore additional mitigation measures are recommended to resolve the wind comfort at the new locations, as detailed in Table 11.2 below.

Table 11.2 Revised Proposed Mitigation – Completed Proposed Development with Existing Surrounds and Proposed Landscaping

Balcony Location	Exceedance	Mitigation Measure
B1	Summer Exceedance	1.5m High Balustrades
B2	Summer Exceedance	1.5m High Balustrades
B3	Summer Exceedance	1.5m High Balustrades
B4	Summer Exceedance	1.5m High Balustrades
B5	Summer Exceedance	1.5m High Balustrades
B6	Summer Exceedance	1.5m High Balustrades
B7	Summer Exceedance	1.5m High Balustrades
B8	Summer Exceedance	1.5m High Balustrades
B9	Summer Exceedance	1.5m High Balustrades

Balcony Location	Exceedance	Mitigation Measure
B10	Summer Exceedance	1.5m High Balustrades
B11	Summer Exceedance	1.5m High Balustrades
B12	Summer Exceedance	1.5m High Balustrades
B13	Summer Exceedance	1.5m High Balustrades
B14	Summer Exceedance	1.5m High Balustrades
B15	Summer Exceedance	1.5m High Balustrades
B16	Summer Exceedance	1.5m High Balustrades
B17	Summer Exceedance	1.5m High Balustrades
B18	Summer Exceedance	1.5m High Balustrades
B19	Summer Exceedance	1.5m High Balustrades
B20	Summer Exceedance	1.5m High Balustrades
B21	Summer Exceedance	1.5m High Balustrades
B22	Summer Exceedance	1.5m High Balustrades
B23	Summer Exceedance	1.5m High Balustrades
B24	Summer Exceedance	1.5m High Balustrades
B25	Summer Exceedance	1.5m High Balustrades
B26	Summer Exceedance	1.5m High Balustrades
B27	Summer Exceedance	1.5m High Balustrades
B28	Summer Exceedance	1.5m High Balustrades
B29	Summer Exceedance	1.5m High Balustrades
B30	Summer Exceedance	1.5m High Balustrades
B31	Summer Exceedance	1.5m High Balustrades
B32	Summer Exceedance	1.5m High Balustrades
B33	Summer Exceedance	1.5m High Balustrades
B34	Summer Exceedance	1.5m High Balustrades

Figure 11.1 Revised Proposed Tested Mitigation – Plan View Comfort

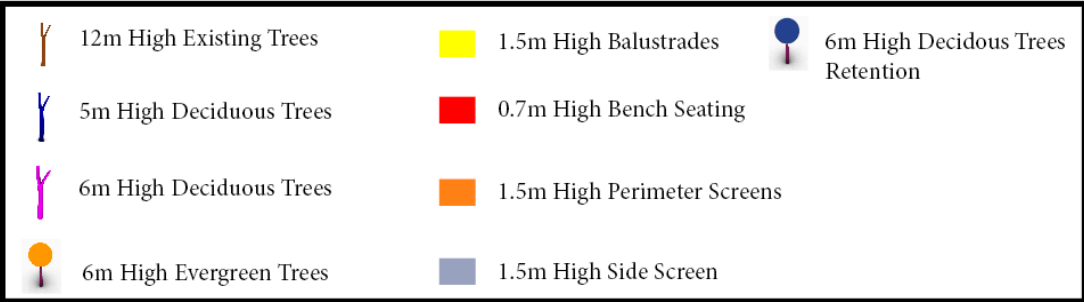
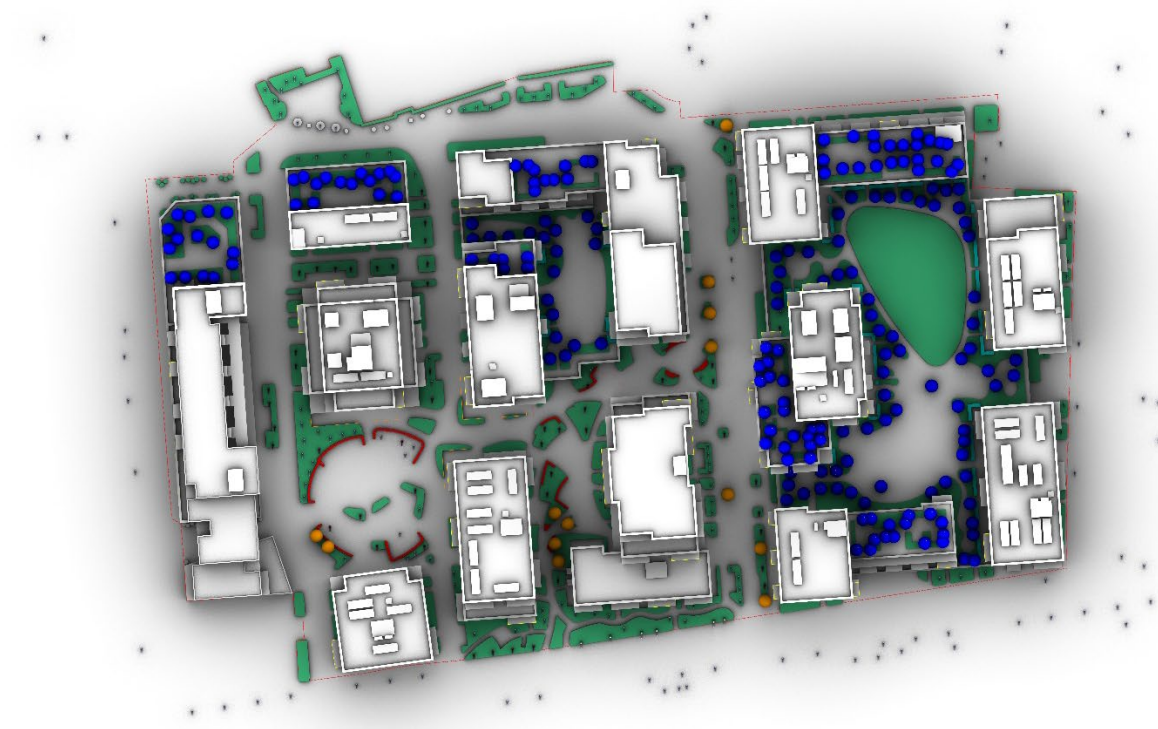


Figure 11.2 Revised Proposed Tested Mitigation – 3D West Aspect - Comfort

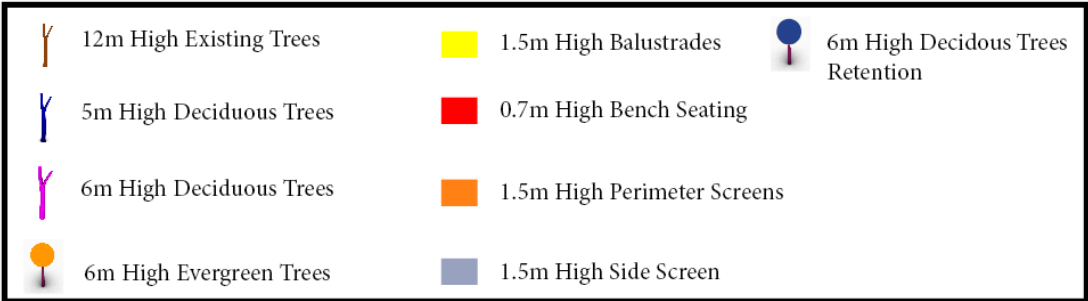
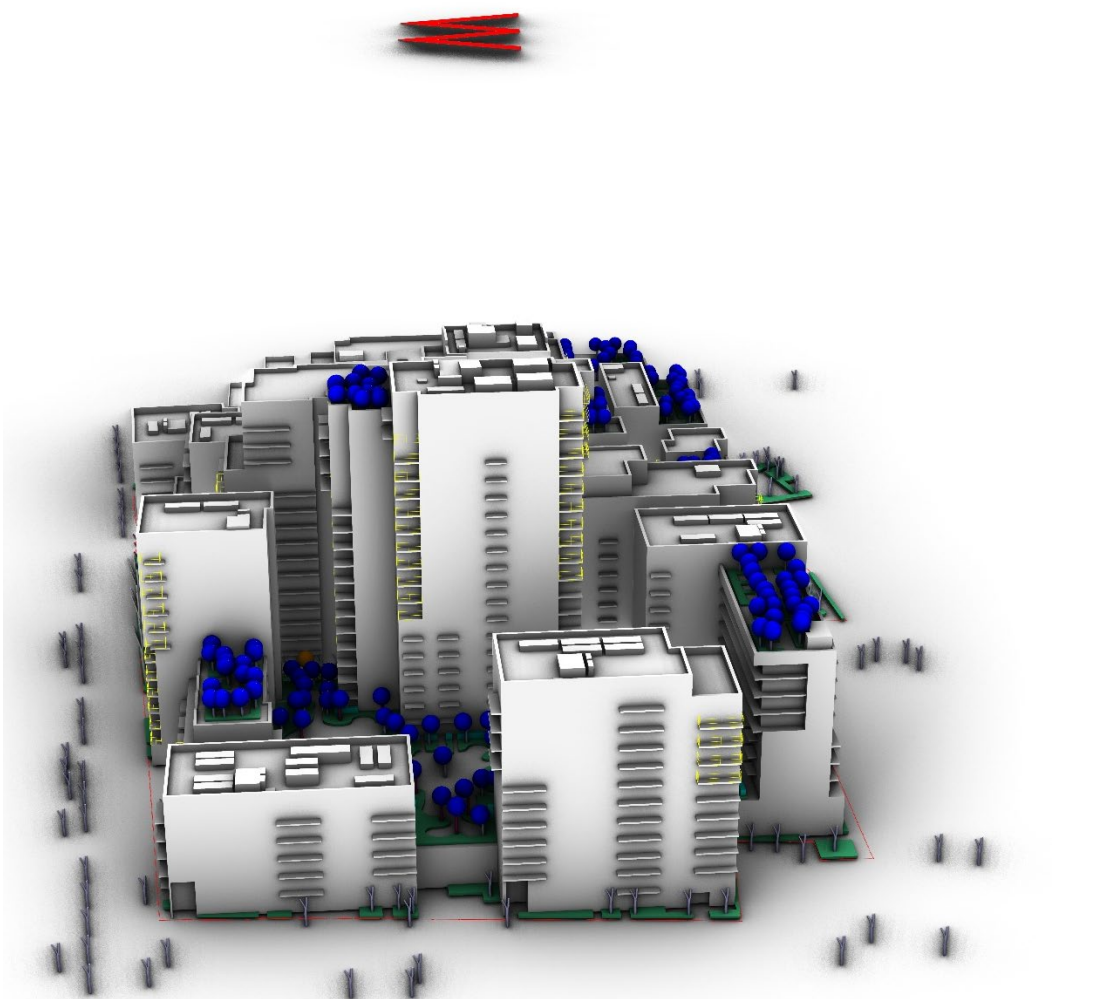
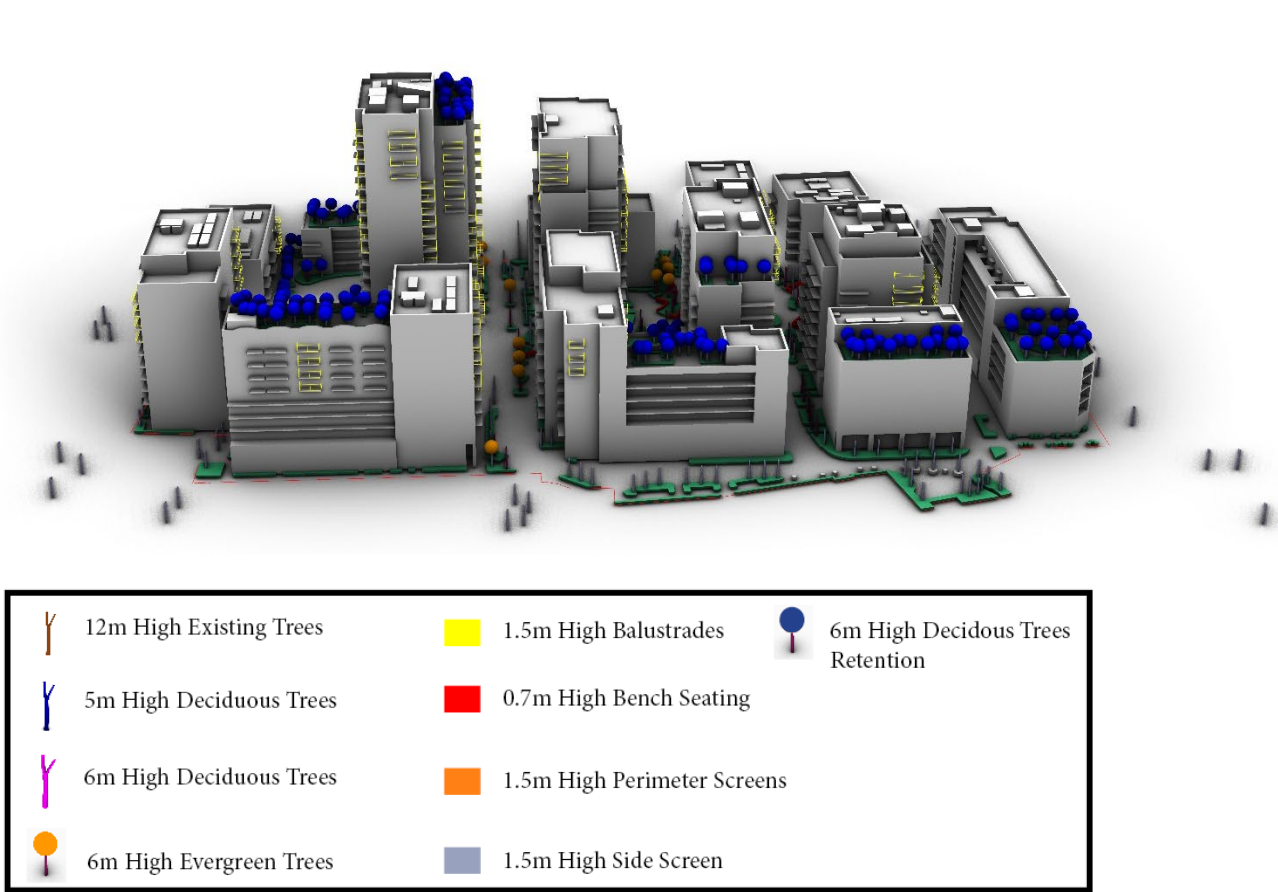


Figure 11.3 Revised Proposed Tested Mitigation – 3D East Aspect- Comfort



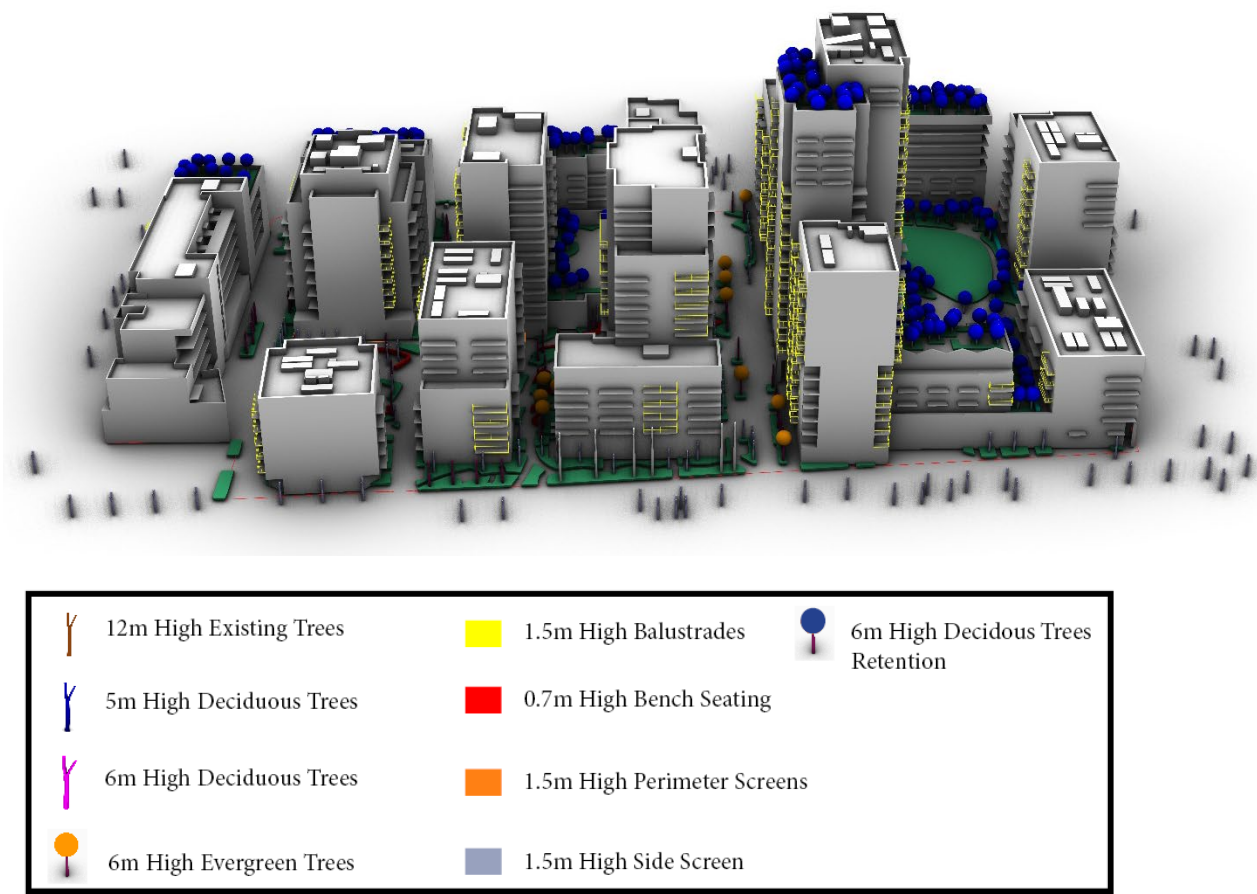
- | | | |
|---|---|---|
|  12m High Existing Trees |  1.5m High Balustrades |  6m High Deciduous Trees Retention |
|  5m High Deciduous Trees |  0.7m High Bench Seating | |
|  6m High Deciduous Trees |  1.5m High Perimeter Screens | |
|  6m High Evergreen Trees |  1.5m High Side Screen | |

Figure 11.4 Revised Proposed Tested Mitigation – 3D North Aspect- Comfort



- | | | |
|--|---|---|
|  12m High Existing Trees |  1.5m High Balustrades |  6m High Deciduous Trees Retention |
|  5m High Deciduous Trees |  0.7m High Bench Seating | |
|  6m High Deciduous Trees |  1.5m High Perimeter Screens | |
|  6m High Evergreen Trees |  1.5m High Side Screen | |

Figure 11.5 Revised Proposed Tested Mitigation – 3D South Aspect- Comfort



Residual Effects

- 11.21 The Wind assessment considered within the July 2024 ES remains materially unchanged and valid as presented within the July 2024 ES.
- 11.22 Additional CFD testing has been undertaken post the July 2024 ES to assess the efficacy of the mitigation measures noted in July 2024 ES Wind Microclimate Chapter. It has been concluded that the revised mitigation outlined herein was effective for both pedestrian wind comfort and safety and thereafter no residual effects remain. The wind conditions on the elevated balcony and terrace levels are also found to be suitable for the intended use in most areas. However, there are some isolated areas on the balconies where the wind conditions are unsuitable for the intended use.
- 11.23 Based on the currently tested mitigation measures within the additional CFD testing, and assessing the minor remaining areas of wind-related discomfort, it is further concluded from professional judgement that with the inclusion of similar mitigation measures to the ones already tested in other areas (i.e. 1.5m Balustrades), the remaining uncomfortable areas on balconies and/or terrace, will thereafter have acceptable conditions.
- 11.24 Nonetheless, whilst the number of remaining locations experiencing areas of wind related discomfort has reduced significantly, the efficacy of this mitigation proposed at these remaining locations has not been tested quantitatively at this stage. Therefore, moderate adverse significant effects still remain at balcony locations B1 to B34, as shown in Figure 11.6 to Figure 11.10. It should be acknowledged that based upon professional judgment it is deemed that the proposed mitigation will remove the significant adverse effects. This will be further tested at the detailed design stage prior to occupation.

ASSESSMENT OF THE FUTURE ENVIRONMENT

Evolution of the Baseline

11.25 The evolved baseline conditions remain as presented in the July 2024 ES.

Future Baseline Conditions

11.26 There is no material change to the future baseline conditions as presented in the July 2024 ES.

CLIMATE CHANGE

11.27 The impacts of climate change discussed in relation to Wind are not affected by the Revised Proposed Development.

CUMULATIVE EFFECTS ASSESSMENT

Demolition and Construction

11.28 There is no change to effects during the construction and demolition phase as presented in the July 2024 ES.

Completed Development

11.29 There is no material change to the cumulative effects assessment following the completion of the development presented in the July 2024 ES.

LIKELY SIGNIFICANT EFFECTS

- 11.30 The conclusions presented within the July 2024 ES remains broadly unchanged as presented within the July 2024 ES.
- 11.31 Post the July 2024 ES, further CFD testing has been conducted on the Revised Proposed Development, which showed that the revised mitigation outlined herein was effective for both pedestrian wind comfort and safety and thereafter no residual effects remain at those locations. The wind conditions on the elevated balcony and terrace levels were also found to be suitable for the intended use in most areas with the exception of some isolated areas on balconies, which were experiencing moderate adverse significant effects.
- 11.32 Based on the currently tested mitigation measures and professional judgement, it is concluded that the additionally identified comfort exceedances on isolated areas can be mitigated with the suggested mitigation involving implementation of 1.5m balustrades such that no residual effects remain. However, as the mitigation has not been quantitatively tested at this stage, it is still appropriate to report moderate adverse effects at these isolated (reduced number of) locations, albeit with the acknowledgement that these are likely to be mitigated by 1.5m balustrades and will be tested for efficacy prior to occupation. No further testing is deemed necessary at this stage.

Figure 11.6 Additional Mitigation Locations – Plan View



Figure 11.7 Additional Mitigation Locations – 3D West Aspect



Figure 11.8 Additional Mitigation Locations – 3D East Aspect- Comfort

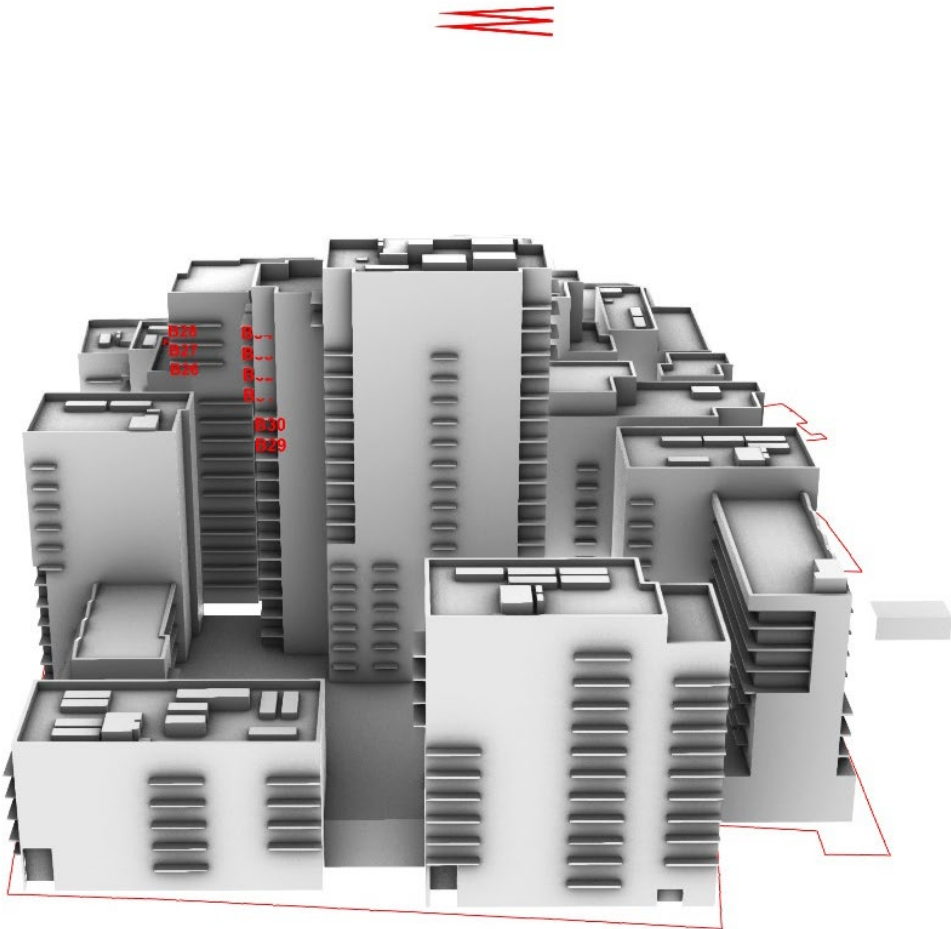


Figure 11.9 Additional Mitigation Locations – 3D North Aspect- Comfort

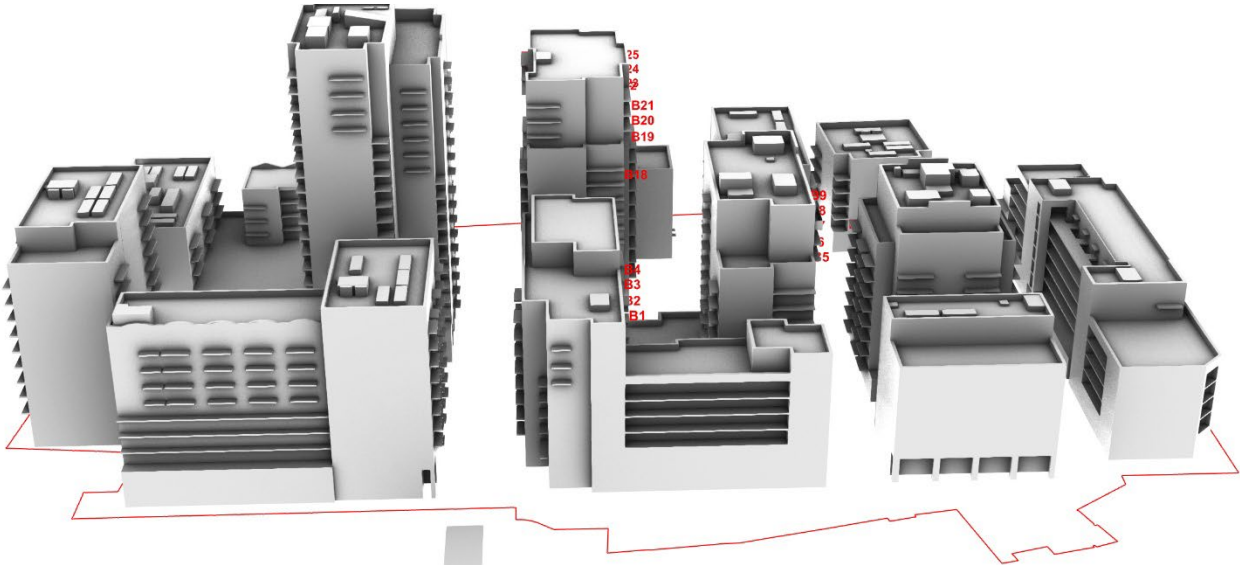
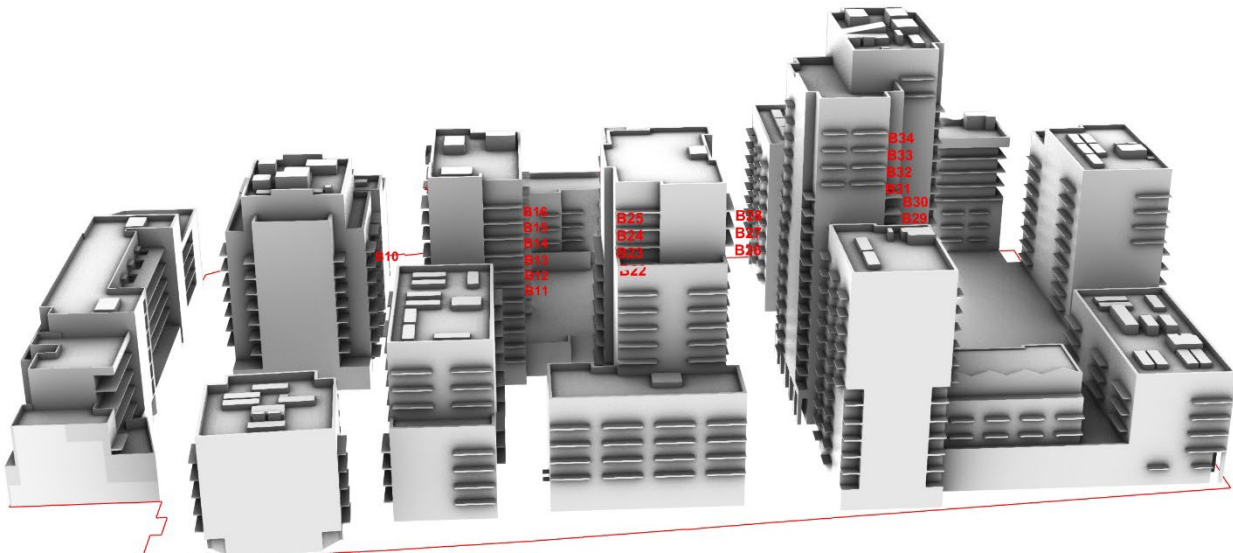


Figure 11.10 Additional Mitigation Locations – 3D South Aspect- Comfort



Chapter 12: Archaeology

INTRODUCTION

12.1 The Archaeology Chapter of the July 2024 ES (Chapter 12) has been reviewed in the context of the Revised Proposed Development to determine if the conclusions of this assessment remain valid. In addition, consideration has been given to any updates / changes to baseline, policy and methodology.

CONSULTATION SINCE THE JULY 2024 ES

12.2 An ES Review was provided by LUC in November 2024, responses to the clarifications raised in LUC's ES Review are presented in Table 12.1 below.

Table 12.1 ES Review Response Table

Requested Clarification / Potential Regulation 25	Response
Clarification Point (ARCH01) Explanation should be provided that the assessment follows an appropriate, agreed source such as IEMA, IHBC, CIfA'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.	The CifA's 2021 Principles of Cultural Heritage Impact Assessment was reviewed and considered when undertaking the July 2024 ES Chapter. The reference to the DMRB is considered appropriate, as although it is intended specifically for road schemes, it is published and established guidance which sets out a widely applicable methodology for assessment.
Clarification Point (ARCH02) Confirmation of the full list of sources applied should be provided.	The technical appendix includes reference to all sources consulted and this ES Addendum includes a list of all relevant sources used (Appendix 12.1).
Clarification Point (ARCH04) Confirmation should be provided that the approach to cumulative assessment has been agreed with the LBS archaeology advisor.	Confirmation of the approach from LBS is not required as the methodology is based upon professional judgement and regularly applied and accepted in other ES Chapters prepared for sites in the LBS. The final list of potential cumulative schemes has been checked, updated and considered within this ES Addendum.
Potential Regulation 25 Point (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, CIfA's 2021 Principles of Cultural Heritage Impact Assessment in the UK, is recommended to help achieve clarity.	Point 60 in the Scoping Opinion states " <i>The aim to differentiate clearly between the two terms is understandable but may prove difficult to achieve in practice. If this does prove to be the case, then a different term for the significance of a buried heritage asset can be adopted and the term 'heritage significance' would be appropriate in reference to this aspect of a receptor.</i> " It is considered that the methodology set out and applied in the ES Chapter is proportionate, straightforward and consistent. It has been accepted by LBS Archaeology Advisors previously and as yet there has been no concern expressed by the Advisors as to the transparency of the approach and results, and the use of 'significance' rather than 'importance' thus it is not considered necessary to adopt different terminology.
Potential Regulation 25 Point (ARCH05) Conclusions on residual effects to archaeology should be amended to remove inappropriate reduction of level of harm ascribed to off-setting measures.	The reasoning behind the 'one step' reduction is clearly explained in paragraphs 12.28 and 12.29 of the July 2024 ES (Chapter 12) and it sets out the general industry understanding of off-setting when archaeological remains would otherwise be removed by development without the opportunity to investigate and record them. It is recognised and understood that the archaeological work to off-set the impacts of a proposed development is itself destructive but it is also recognised within the industry that the appropriate dissemination of the results balances to some degree the loss of the asset within the impacted area. The reduction of the significance of the Environmental Effect is the recognition of this. The removal of this from the consideration of off-setting would potentially result in a disproportionate level of Residual Environmental Effect being applied to any proposed development. The archaeology advisor for LBS has never taken issue with this approach or raised any objection to it.
Potential Regulation 25 Point (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.	No changes to the NTS are required.

12.3 Comments were also provided by LBS Archaeology Advisor in September 2024. Responses to these comments are presented in Table 12.2 below.

Table 12.2 Responses to Consultee Comments

Comment	Response
LBS archaeology Advisor agreed that a Method Statement/Written Scheme of Investigation (WSI) for the archaeological monitoring of geotechnical investigations should be attached to the planning application and this work should be undertaken during the determination period.	A programme of geotechnical investigations and the archeological monitoring of these is currently being prepared.
LBA Archaeology Advisor agreeing to 250m study is acceptable	Updated GLHER data obtained for a 250m study area (para 12.11 below).

LEGISLATION, PLANNING POLICY AND GUIDANCE

12.4 There are no changes to legislation, planning policy and guidance which remains as set out within the July 2024 ES Archaeology Chapter.

ASSESSMENT METHODOLOGY

Defining the Baseline

12.5 The method for determining the baseline conditions remains as presented within the July 2024 ES Archaeology Chapter.

Impact Assessment Methodology

12.6 There are no changes to the assessment methodology set out within the July 2024 ES Archaeology chapter. Consequently, the assessment methodology and significance criteria stated in the July 2024 ES Archaeology Chapter remains applicable and valid.

Methodology For Defining Effects

Receptors And Receptor Sensitivity

12.7 No amendments have been made to the receptors or their sensitivity considered in the July 2024 ES Archaeology Chapter.

Magnitude of Impact

12.8 No amendments have been made to the method to determine magnitude of impact and it remains the same as considered in the July 2024 ES Archaeology Chapter.

Defining the Effect

12.9 No amendments have been made to the method used for defining the effects and it remains the same as considered in the July 2024 ES Archaeology Chapter.

Categorising Likely Significant Effects

12.10 No amendments have been made to the categorisation of likely significant effects and it remains the same as considered in the July 2024 ES Archaeology Chapter.

BASELINE CONDITIONS

Current Baseline Conditions

- 12.11** A new dataset of data held on the Greater London Historic Environment Record (GLHER) was obtained on 22nd November 2024 for the same 250m radius study area used for the July 2024 ES Chapter 12: Archaeology. The updated GLHER data includes two additional archaeological investigations, but the results of these have made no material change to the baseline conditions as presented within the July 2024 ES Archaeology Chapter. The new dataset is summarised within the Desk Based Assessment (DBA) Addendum presented in Appendix 12.2 of this ES Addendum.

IMPLICATIONS OF THE REVISED PROPOSED DEVELOPMENT

- 12.12** There are no new implications introduced by the Revised Proposed Development on the Archaeology assessment which therefore remains as presented within the July 2024 ES Archaeology Chapter.

Embedded Mitigation

- 12.13** The section on embedded mitigation remains as presented within the July 2024 ES Archaeology Chapter.

POTENTIAL EFFECTS

Demolition and Construction

- 12.14** There are no changes that will affect the previous assessment undertaken and therefore the July 2024 ES Archaeology Chapter remains robust and valid.

Completed Development

- 12.15** No impacts or effects will occur on buried heritage assets on completion of the Proposed Development since no further ground disturbance will occur and therefore the July 2024 ES Archaeology Chapter remains robust and valid.

MITIGATION, MONITORING AND RESIDUAL EFFECTS

Demolition and Construction Mitigation

- 12.16** The mitigation measures and residual effects remain the same, and therefore the conclusions of the July 2024 ES Archaeology Chapter remain robust and valid.
- 12.17** However, post-submission comments from the LBS Archaeology Officer have queried when the Applicant intends to undertake archaeological survey work at the Site. The intention is to undertake these works post-planning on the grounds that the Site is not expected to have archaeological remains that may merit preservation in-situ or be of such significance to influence the scheme for which planning permission is being sought. Although it was envisaged that the Phase 1 geotechnical investigations to be archaeologically monitored would take place during the Determination Period of the planning application in order to clarify levels of past truncation and the presence and depth of survival of deposits of archaeological interest, the programme is currently being reviewed.

Completed Development Mitigation

- 12.18** No mitigation is required and therefore the conclusions of the July 2024 ES Archaeology Chapter remain robust and valid.

Residual Effects

- 12.19** All aspects of the Archaeology assessment considered within the July 2024 ES remain unchanged and valid as presented within the July 2024 ES Archaeology Chapter.

ASSESSMENT OF THE FUTURE ENVIRONMENT

Evolution of the Baseline

- 12.20** The evolved baseline conditions remain as presented in the July 2024 ES Archaeology Chapter.

Future Baseline Conditions

- 12.21** The future baseline conditions remain as presented within the July 2024 ES Archaeology Chapter.

CLIMATE CHANGE

- 12.22** The impacts of climate change discussed in relation to Archaeology are not affected by the Revised Proposed Development.

CUMULATIVE EFFECTS ASSESSMENT

Demolition and Construction

- 12.23** The additional cumulative schemes do not materially change the assessment previously undertaken or the conclusions presented. Therefore, there are no amendments to the assessment presented in the July 2024 ES Archaeology Chapter.

Completed Development

- 12.24** The additional cumulative schemes do not materially change the assessment previously undertaken or the conclusions presented. Therefore, there are no amendments to the assessment presented in the July 2024 ES Archaeology Chapter.

LIKELY SIGNIFICANT EFFECTS

- 12.25** The likely significant effects remain the same, and therefore the July 2024 ES Archaeology Chapter remains robust and valid.

Chapter 13: Ground Conditions and Land Contamination

INTRODUCTION

13.1 The Ground Conditions and Land Contamination Chapter of the July 2024 ES (ES Chapter 13) has been reviewed in the context of the Revised Proposed Development to determine if the conclusions of this assessment remain valid. In addition, consideration has been given to any updates / changes to baseline, policy and methodology.

CONSULTATION SINCE THE JULY 2024 ES

13.2 An ES Review was undertaken by LUC in November 2024 (Review report being dated October 2024); our response to the clarifications raised in LUC’s ES Review are set out in Table 13.1 below.

Table 13.1 ES Review Response Table

Requested Clarification / Potential Regulation 25	Response
Clarification Point (Ref: GC1) Further explanation as to the justification of this selected study area extent is required	Refer to Paragraph 13.6 below.
Clarification Point (Ref: GC2) Clarification whether consultation with a petroleum licensing officer is to be undertaken	Refer to Paragraph 13.13 below.
Clarification Point (Ref: GC3) Clarification whether the groundwater receptor includes consideration of the Thanet Sands Secondary A aquifer and underlying Chalk Principal aquifer	Refer to Paragraph 13.15 below.
Clarification Point (Ref: GC4) Revision of UXO potential effects classifications, as a result for demolition and construction works	Refer to Paragraph 13.19 to 13.22 below.
Clarification Point (Ref: GC8) Inclusion of mitigation measures for receptors such as surface water, construction works and nearby residents in Paragraph 13.140	Refer to Paragraph 13.24 to 13.30 below.
Clarification Point (Ref: GC10) Update to the NTS with respect to clarifications and information detailed within this review	Based on the responses to clarifications (GC1-GC4 and GC8) above, the NTS does not require updating. The level of detail provided on the proposed mitigation is sufficient for the purposes of the NTS, and the likely significant effects remain unchanged.
Potential Regulation 25 Point (Ref: GC5) No combined effects have been considered for Ground Conditions and Contamination in Chapter 15 or elsewhere in the ES.	Refer to Paragraph 13.38 to 13.40 below.

LEGISLATION, PLANNING POLICY AND GUIDANCE

13.3 The previous ES refers to the 2023 National Planning Policy Framework (NPPF). The NPPF have since been updated and the most recent version is December 2024. The policy relevant to Ground Conditions and Land Contamination are the same, however, the paragraph number is now 189 of the NPPF rather than Paragraph 183.

13.4 There are no other changes in regard to legislation, planning policy and guidance.

ASSESSMENT METHODOLOGY

Defining the Baseline

13.5 The method for determining the baseline conditions remains the same as presented within the July 2024 ES.

13.6 LUC commented on the study area extent and stated that “further explanation as to the justification of this selected study area extent is required”. The ES confirms that the study area is defined as a 2km radius around the site. This is considered to be an appropriate study area for assessing the impacts on ground conditions and land contamination. The ES draws largely on the results of the Phase 1 Land Contamination Assessment and this refers to a review of a third-party Groundsure Environmental Database report for the site which covers up to a 2 km radius of the site. It is considered that any significant receptors associated with ground conditions and land contamination as a result of the proposed development would be located within the 2km radius of the site.

Impact Assessment Methodology

13.7 There are no changes to the assessment methodology set out within the July 2024 ES Ground Conditions Chapter. Consequently, the assessment methodology and significance criteria stated in the Ground Conditions and Land Contamination Chapter July 2024 ES Chapter remain applicable and valid.

Methodology For Defining Effects

Receptors And Receptor Sensitivity

13.8 With the exception of including human health (construction workers and adjacent site users) being included as receptors for the remobilisation and creation of contaminant pathways to controlled waters impact, no further amendments have been made to the receptors or their sensitivity as considered in the July 2024 Ground Conditions and Land Contamination Chapter

Magnitude of Impact

13.9 No amendments have been made to the method to determine magnitude of impact and it remains the same as considered in the July 2024 ES Ground Conditions and Land Contamination Chapter.

Defining the Effect

13.10 No amendments have been made to the method used for defining the effects so it remains the same as considered in the July 2024 ES Ground Conditions and Land Contamination Chapter.

Categorising Likely Significant Effects

13.11 No amendments have been made to the categorisation of likely significant effects so it remains the same as considered in the July 2024 ES Chapter 13: Ground Conditions and Land Contamination Chapter.

BASELINE CONDITIONS

Current Baseline Conditions

13.12 The baseline conditions remain the same as presented within the July 2024 ES Ground Conditions and Land Contamination chapter.

13.13 The LUC review states that “consultation has been undertaken with the Environment Agency and LBS as part of the Phase 1 LCA, however there is no consultation noted with a petroleum licensing officer which is recommended by the LUC”. Consultation with a petroleum officer will be undertaken at the detailed design stage when determining the decommissioning of the existing petrol filling station at the site. The Proposed Development does not include a replacement petrol filling station and therefore licensing for storing petrol at the site would no longer be required. The embedded mitigation measures which would be implemented in a Demolition and Construction Environmental Management Plan (DCEMP) controlled via a condition (Para 13.12 of the July 2024 ES chapter) will ensure that there would be no detrimental or adverse impacts as a result of

the decommissioning and demolition of the existing petrol filling station on nearby receptors. It is therefore considered that the result of consultation with the Petroleum Licencing Officer would not change the conclusions of the July 2024 ES Ground Conditions and Land Contamination chapter.

13.14 Comment GC6 of the LUC review goes on to state that the “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**)” confirming that the implementation of a DCEMP at the detailed design stage is acceptable.

13.15 The LUC review further states that “Clarification whether the groundwater receptor includes consideration of the Thanet Sands Secondary A aquifer and underlying Chalk Principal aquifer” in reference to Table 13.4 receptor sensitivity table of the July 2024 ES Chapter. It can be confirmed that the groundwater receptor does take into consideration both the underlying Thanet Sands Secondary A aquifer and underlying chalk, this is further confirmed by groundwater being classified as having a sensitivity of ‘High’ due to “groundwater recorded within the Lambeth Group around 8 m bgl, as well as this the site is underlain by both Secondary A Aquifers and Principal Aquifer (at depth)”.

IMPLICATIONS OF THE REVISED PROPOSED DEVELOPMENT

13.16 There are no implications of the Revised Proposed Development on the Ground Conditions and Land Contamination assessment.

Embedded Mitigation

13.17 The embedded mitigation remains as presented within the July 2024 ES Chapter: Ground Conditions and Land Contamination.

POTENTIAL EFFECTS

Demolition and Construction

13.18 The Revised Proposed Development will not affect the demolition and construction assessment as stated in the July 2024 ES chapter and therefore the July 2024 ES Chapter 13: Ground Conditions and Land Contamination chapter remains robust and valid.

13.19 It should be clarified that the LUC review refers to the July 2024 ES Chapter and states that “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”.

13.20 Paragraph 13.145 of the July 2024 ES Chapter proposing the mitigation measures that a UXO Risk Management Plan is undertaken for the full site area prior to any excavation works to define the level of risk and to recommend appropriate mitigation measures. A phasing plan for any remediation works would be provided following the results of the comprehensive intrusive investigation. This plan will be submitted to the LBS alongside a remediation report to inform the demolition and construction works with the purpose to achieve an environmental betterment. Should any UXO be identified on-site, then the immediate area surrounding the UXO should be tested for potential leaching and/ or pollution and from here a remediation strategy will be prepared, agreed and employed prior to any further works on-site. It is also recommended that UXO awareness briefings are given to all personnel undertaking any works on-site.

13.21 Comment GC9 of the LUC review confirms that “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”.

13.22 With the above mitigation measures in place and being undertaken prior to any works being completed then any UXO found on site would be removed quickly and poses no long term risk. It is therefore proposed that

with the mitigation measure in place the risk of UXO would be short-term and temporary as suggested in the original July 2024 chapter.

Completed Development

13.23 The Revised Proposed Development will not affect the operational assessment as presented in the July 2024 ES chapter and therefore the July 2024 ES Ground Conditions and Land Contamination chapter remains robust and valid.

MITIGATION, MONITORING AND RESIDUAL EFFECTS

Demolition and Construction Mitigation

13.24 The LUC review states that “Paragraph 13.140 provides no commentary of the mitigation measures for receptors such as surface water, construction works and nearby residents (GC8)”.

13.25 This is in relation to the mitigation measures proposed for the impact of the potential remobilisation of any existing contamination and creation of contaminated pathways via leaching and/or migration of contaminants during the demolition and construction phases of the development.

13.26 The mitigation measures proposed in the July 2024 ES Chapter 13: Ground Conditions and Land Contamination include a comprehensive intrusive investigation including groundwater monitoring, a remediation and/or mitigation strategy and verification report, foundations works risk assessment and piling method statement all of which can be controlled via a suitably worded planning condition.

13.27 Comment GC8 of the LUC review confirms that “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”.

13.28 Paragraph 13.140 of the July 2024 ES chapter states that “With these mitigation measures in place, it is considered that the residual effect would be Negligible on the soils and made ground, superficial and bedrock geology and groundwater. The residual effect is not significant”.

13.29 It is earlier confirmed within the ES chapter in Paragraph 13.87 that the impact for the potential remobilisation and creation of contaminant pathways during the construction phase on surface waters, in particular the River Peck via surface water runoff, is Negligible. This is because the closest watercourse is located 370 m south of the site and is a culverted ‘lost watercourse’ so, given its distance and nature (i.e. being culverted), the risk of this water body being exposed to any remobilised contamination is negligible. It is not identified as a significant receptor in the mitigation section for this reason.

13.30 That being said, the mitigation measures that have been proposed in the July 2024 ES chapter would mitigate any contamination risks to surface water receptors as well as any risks to construction workers and nearby residents and the identified receptors of soils and made ground, superficial and bedrock geology and groundwater as identified in the ES Chapter.

Completed Development Mitigation

13.31 The mitigation measures and residual effects remain the same and, therefore, the conclusions of the July 2024 ES Ground Conditions and Land Contamination chapter remains robust and valid.

Residual Effects

13.32 Table 13.2 below presents a summary of the residual effects of the Revised Proposed Development, as assessed within this document. All other aspects of the Ground Conditions and Land Contamination assessment considered within the July 2024 ES which have not been updated (as discussed within the above sections), remain unchanged and valid as presented within the July 2024 ES.

Table 13.2 Residual Effects of the Revised Proposed Development Assessed Within This Document

Receptor	Description of the Residual Effect	Scale and Nature	Significant / Not Significant	Geo	D I	P T	St Mt Lt
Demolition and Construction							
Hydrogeology	Remobilisation and creation of contaminant pathways to controlled waters.	Negligible (Potentially Minor Beneficial on soils made ground, geology and Hydrogeology following remediation)	Not Significant (Significant)	L	D	T	St
Hydrology (River Peck)							
Soils and Made Ground							
Superficial Deposits (Interglacial Lacustrine Deposits)							
Bedrock Geology (Lambeth, Thanet Sands and Chalk)							
Human Health (Construction workers and adjacent site users).							
Notes: Residual Effect - Scale = Negligible / Minor / Moderate / Major - Nature = Beneficial or Adverse Geo (Geographic Extent) = Local (L), Borough (B), Regional (R), National (N) D = Direct / I = Indirect P = Permanent / T = Temporary St = Short Term / Mt = Medium Term / Lt = Long Term N/A = not applicable / not assessed							

13.33 The differences in the assessment of effects from those presented within the July 2024 ES are as follows:

- Human health (construction workers and adjacent site users) have been included as receptors for the remobilisation and creation of contaminant pathways to controlled waters impact. There is no change to the likely significant effects as a result of this additional receptor. The likely significant residual effect to human health as a result of remobilisation and creation of contaminant pathways to controlled waters is identified as negligible (at worst), which is not significant.

ASSESSMENT OF THE FUTURE ENVIRONMENT

Evolution of the Baseline

13.34 There is no material change to the evolved baseline conditions as presented in the July 2024 ES.

Future Baseline Conditions

13.35 There is no material change to the future baseline conditions as presented in the July 2024 ES.

CLIMATE CHANGE

13.36 The impacts of climate change discussed in relation to Ground Conditions and Land Contamination are not affected by the Revised Proposed Development.

CUMULATIVE EFFECTS ASSESSMENT

- 13.37 The LUC review states that “No combined effects have been considered for Ground Conditions and Contamination in Chapter 15 or elsewhere in the ES. (GC5)”.
- 13.38 The July 2024 ES chapter Paragraphs 13.457 – 161 confirm that as all new development is required to meet relevant criteria including (but not limited to) Part IIA of the Environmental Protection Act and associated planning conditions and, on sites where contamination is present, intrusive investigation and risk assessment and subsequent remediation strategy and verification plan are required, the cumulative impact of site-specific remediation will improve general ground conditions at the local scale, leading to a Negligible effect (at worst) and (potentially Minor Beneficial at best) cumulative effect. The additional cumulative schemes do not materially change the assessment previously undertaken or the conclusions presented. Therefore, there are no amendments to the assessment presented in the July 2024 ES Ground Conditions and Land Contamination Chapter.
- 13.39 With regards to the in-combination effects presented in the July 2024 ES Chapter 15: Effect Interaction, ground conditions and contamination effects are not included. This is due to the reasonable worst case residual effects being classified as negligible. Based on the definitions of what negligible effects comprise for each of the technical assessments as presented in this ES, these do not warrant further consideration in relation to in-combination effects and have therefore not been pulled through into the assessment of effect interactions. Only effects described as minor and above in scale are considered.
- 13.40 On this basis, it is considered that there are no combined impacts because the reasonable worst case cumulative effects are negligible on ground conditions and land contamination.

LIKELY SIGNIFICANT EFFECTS

13.41 The likely significant effects remain the same and therefore the July 2024 ES remains robust and valid.

Chapter 14: Climate Change and Greenhouse Gases

INTRODUCTION

14.1 The Climate Change and Greenhouse Gases of the July 2024 ES (Chapter 14) has been reviewed in the context of the Revised Proposed Development to determine if the conclusions of this assessment remain valid. In addition, consideration has been given to any updates / changes to baseline, policy and methodology.

CONSULTATION SINCE THE JULY 2024 ES

14.2 An ES Review was provided by LUC in November 2024 (Review report being dated October 2024), responses to the clarifications raised in LUC’s ES Review are presented in Table 14.1 below.

Table 14.1 ES Review Response Table

Requested Clarification / Potential Regulation 25	Response
Clarification Point (Ref: 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.	Although it is not explicitly stated in the chapter, where relevant to an aspect of the climate change adaptation and resilience assessment, the existing conditions are considered on a regional (i.e. London) scale. In relation to the In-Combination Climate Change Impacts, as these are qualitative in nature, these assessments are based more on trends against the (national level) historic baseline and the projected future scenario for the region.
Clarification Point (Ref: CC2) Key assumptions from the WLC assessment should be included in the methodology section of the chapter.	The key assumptions made during the preparation of the Whole Life Cycle Carbon Emissions Assessment (WLCA) ¹ have been included in Table 14.2 of the Climate Change and Greenhouse Gases ES Addendum Chapter.
Clarification Point (Ref: CC3) The NTS may need updating with respect to the additional clarifications as detailed within this review.	Based on the responses to clarifications (CC1 and CC2) above, the NTS does not require updating. The level of detail provided is sufficient for the purposes of the NTS, and the likely significant effects remain unchanged.

PART A CLIMATE CHANGE RESILIENCE AND ADAPTATION

- 14.3 The future climate change scenario has been considered by each of the technical topics covered within this ES Addendum. The aim of the assessment has been to consider whether the effect on receptors (under the current condition, without climate change) are likely to be different under an alternative future climate regime; in particular, to identify whether the potential impacts of the Revised Proposed Development will be worse or improve under the future baseline, and therefore if these changes alter the significance of effects identified for the Revised Proposed Development under the current condition (without climate change). A key aspect of the assessment (for each of the technical topics considered) has been to identify the likely effect of those receptors considered more vulnerable to changes in climate, having taken into account the resilience and adaptive measures (being either design or management) which are proposed for the scheme in order to mitigate the risk presented by climate change.
- 14.4 Each topic has sought to review the previous climate change assessment for their topic in the context of the Revised Proposed Development and confirmed that the assessment and conclusions are unlikely to materially change from that which was previously presented within the July 2024 ES as a result of the Revised Proposed Development. The previously stated conclusions therefore remain valid.
- 14.5 No additional or different likely significant climate change adaptation / resilience related effects have been identified.

PART B GREENHOUSE GAS EMISSIONS ASSESSMENT

LEGISLATION, PLANNING POLICY AND GUIDANCE

14.6 There are no changes to the published legislation, policy and guidance set out within the Climate Change and Greenhouse Gases Chapter of the July 2024 ES. Consequently, the legislation, policy and guidance section stated in the July 2024 ES remain applicable and valid.

ASSESSMENT METHODOLOGY

14.7 There are no changes to the assessment methodology set out with the July 2024 ES Climate Change and Greenhouse Gases Chapter. Consequently, the assessment methodology and significance criteria stated in the July 2024 ES Climate Change and Greenhouse Gases Chapter remains applicable and valid.

Defining the Baseline

14.8 The method for determining the baseline conditions remain the same as presented within the July 2024 ES.

Impact Assessment Methodology

14.9 There are no changes to the assessment methodology set out within the July 2024 ES Climate Change and Greenhouse Gases Chapter. Consequently, the assessment methodology and significance criteria stated in the July 2024 ES Climate Change and Greenhouse Gases Chapter remains applicable and valid.

Assumptions and Limitations

14.10 The assumptions and limitations remain the same as presented within the July 2024 ES Climate Change and Greenhouse Gases Chapter. The key assumptions made during the preparation of the WLCA¹ are presented in Table 14.2, as seen below:

Table 14.2 Key Assumptions within the WLCA

Data	Data Source
Material types and volumes (A1-A3)	Material types were provided in the form of a BIM model output that was used to determine material quantities for the One Click model.
Transport data (A4)	Default values provided by One Click.
Construction site impacts (A5)	Construction value provided by applicant and baseline target provided by BRE.
Refrigerants (B1)	Refrigerant quantity of 355 kg has been estimated based on the use of R32 (ME-Engineers) with annual leakage of 2% and 1% end of life leakage rate with a 99% end of life recovery (as per TM65).
Maintenance (B2)	B2 emissions have been calculated at 10kgCO2/m2, as per GLA guidance.
Repair and Replacement data (B3-B4)	An assumption has been made based on GLA guidance that assumes B3 emissions are 25% of the total B2 emissions for the site. Default values provided by RICS and One Click EPD database for products inputted into software for B4 emissions.
Refurbishment (B5)	At present One Click does not have ways to consider B5 emissions. However, based on the information provided for B3 and B4 it is likely that these emissions have been accounted for.
Operational energy (B6)	Energy consumption based on Energy calculations by ME-Engineers.
Operational water (B7)	Water consumption based on Building Regulations Part G ‘Enhanced Consumption’ of 110 l/pp/d and multiplied by the intended full occupancy of the development.

¹ Hodkinson (2024) Aylesham Centre - Whole Life Cycle Carbon Emissions Assessment AC09A

Data	Data Source
End of life (C1-C4)	Default values provided by One Click based on the information within the EPD database.
Building areas	Total floor area: 106,060 m ² • Retail, Leisure and Commercial Floorspace (Use Class E/Sui Generis) – 17,250 m² • Residential (Use Class C3) – 88,810 m²
Number of occupants	Commercial area - approximately 290 based on the <i>BREEAM New Construction 2018 Occupant Density Guide (Transport 02)</i> . Residential - 2,831 based on the Accommodation schedule. Total- 3,121
Assessment period	60 years

Methodology for Defining Effects

Receptors And Receptor Sensitivity

14.11 No amendments have been made to the receptors or their sensitivity considered in the July 2024 ES Climate Change and Greenhouse Gases Chapter.

Magnitude of Impact

14.12 No amendments have been made to the method to determine magnitude of impact and it remains the same as considered in the July 2024 ES Climate Change and Greenhouse Gases Chapter.

Defining the Effect

14.13 No amendments have been made to the method used for defining the effects and it remains the same as considered in the July 2024 ES Climate Change and Greenhouse Gases Chapter.

Categorising Likely Significant Effects

14.14 No amendments have been made to the categorisation of likely significant effects and it remains the same as considered in the July 2024 ES Climate Change and Greenhouse Gases Chapter.

BASELINE CONDITIONS

Current Baseline Conditions

14.15 The baseline conditions remain the same as presented within the July 2024 ES.

IMPLICATIONS OF THE REVISED PROPOSED DEVELOPMENT

14.16 The implications of the Revised Proposed Development on the Climate Change and assessment relate to: emissions of Greenhouse Gases embedded in the materials used to construct the scheme, emissions from transport movements during both the construction and operational phases, emissions from the energy consumption as described in the Energy Statement and the WLCA for this scheme.

Embedded Mitigation

14.17 There is no material change to the embedded mitigation as presented in the July 2024 ES.

POTENTIAL EFFECTS

Demolition and Construction

Embodied Carbon

14.18 The total embedded CO₂e emissions for the Revised Proposed Development, as presented in modules A1-A3 of the WLCA^{Error! Bookmark not defined.}, are 52,224 tonnes; based on a 9-year construction programme this equates to 5,803 tonnes/annum.

Transport

14.19 The total CO₂e emissions from transport during construction of the Revised Proposed Development, as presented in module A4 of the WLCA^{Error! Bookmark not defined.}, are 1,456 tonnes, based on a 9-year construction programme this equates to 162 tonnes/annum.

Site Activities

14.20 The total embedded CO₂e emissions from site activities during construction of the Revised Proposed Development, as presented in module A5 of the WLCA^{Error! Bookmark not defined.}, are 5,261 tonnes, based on a 9-year construction programme this equates to 585 tonnes/annum.

Completed Development

Repair, Maintenance and Refurbishment

14.21 GHG emissions from repair, maintenance and refurbishment during the Revised Proposed Development's lifetime have been sourced from the whole life-cycle assessment^{Error! Bookmark not defined.} (modules B1-B4) and are 28,771 tonnes, or 480 tonnes/annum based on a lifetime of 60 years.

Transport

14.22 The assessment of transport related GHG emissions for the completed Revised Proposed Development in the opening year are presented in Table 14.3. The assessment multiplies the calculated 2028 GHG emission factors for each mode of travel (see Table 4.3 of the July 2024 ES Chapter) by the distance travelled per mode. Distance travelled was calculated from the number of trips and the average distance travelled per mode as advised by the Transport Consultant.

Table 14.3 Assessment of GHG Emissions from Operational Transport

Mode	Emission Factors CO ₂ e per km or passenger km (from Table 4.3 of the July 2024 ES Chapter)	Distance Travelled per Annum (km) ^a Completed Revised Proposed Development	CO ₂ e Tonnes (per annum) ^b 2028 Opening Year	Lifetime CO ₂ e Emissions Tonnes
Underground	0.0176	6,180,534	109	499
London Bus/Coach	0.0672	2,218,262	149	1,814
Car	0.1268	15,965,021	2,024	27,894
London Taxi	0.2321	134,890	31	431
Motorcycle	0.0862	374,149	32	445
Cycle	0	626,423	0	0
Walk	0	466,044	0	0
Vans	0.1927	177,788	34	539

Mode	Emission Factors CO ₂ e per km or passenger km (from Table 4.3 of the July 2024 ES Chapter)	Distance Travelled per Annum (km) ^a Completed Revised Proposed Development	CO ₂ e Tonnes (per annum) ^b 2028 Opening Year	Lifetime CO ₂ e Emissions Tonnes
HGV	0.7149	209,560	150	2,905
Total	-	26,352,672	2,529	34,527
^a Except national rail, underground and bus, which are passenger km. ^b CO ₂ e emissions are calculated by multiplying distance travelled by CO ₂ e factors by mode from Table 4.3 of the July 2024 ES Chapter.				

Energy Consumption

- 14.23 The CO₂ emissions from energy consumption of the Revised Proposed Development are described in the Energy Statement². The Energy Statement compares the Revised Proposed Development to a notional “baseline” of compliance with Part L Building Regulations.
- 14.24 Table 14.4 summarises the improvement in performance for the Revised Proposed Development for regulated CO₂ emissions, taking into account measures to address the Mayor’s Climate Change Strategy to be lean, be clean, be green.

Table 14.4 Assessment of CO₂ Emissions from Energy Consumption ^a

Item	Domestic (Tonnes CO ₂ per annum)	Non-domestic (Tonnes CO ₂ per annum)	Site-wide (Tonnes CO ₂ per annum)
REGULATED EMISSIONS			
Baseline: Part L compliance	771	58	829
After energy demand reduction (be lean)	595	46	640
% Improvement	23%	21%	23%
After heat network connection (be clean)	595	46	640
% Improvement	23%	21%	23%
After renewable energy (be green)	274	37	310
Total % Improvement	65%	37%	63%
Net Emissions ^b	274	37	310
UNREGULATED EMISSIONS			
With Energy Strategy	269	60	328
REGULATED AND UNREGULATED			
Net Emissions ^b	542	96	638
Notes			
^a As described in the Energy Statement ²			
^b Net emissions do not take into account offsets to meet GLA target zero carbon, which are discussed in the Mitigation section of this ES chapter.			

- 14.25 Table 14.4 shows that the domestic and non-domestic regulated components of the Revised Proposed Development will achieve a 65% and 37% improvement, respectively, in carbon emissions over Part L 2021 compliance, which is above the Mayor’s target of 35% improvement. The London Plan also requires that minimum of 10% and 15% reductions in domestic and non-domestic emissions are met through energy efficiency measures (‘Be Lean’); the Revised Proposed Development meets both the domestic target (23%) and the non-domestic target (21%).

- 14.26 Unregulated emissions do not require specific target reductions compared to a nominal baseline under the London Plan³.
- 14.27 The London Plan requires all residual regulated emissions to be offset to zero, and so the Revised Proposed Development will provide offsetting to further reduce the carbon emissions from regulated energy consumption.

Water Supply and Treatment

- 14.28 GHG emissions associated with water supply and treatment during the operational phase of the Revised Proposed Development, as presented in module B7 of the WLCA^{Error! Bookmark not defined.}, are 142 tonnes; this equates to 2 tonnes per annum based on a 60-year lifetime.

End of Life

- 14.29 The total embedded CO₂e emissions associated with the end-of-life stage of the Revised Proposed Development, as presented in modules C1-C4 of the WLCA^{Error! Bookmark not defined.}, are 4,104 tonnes.
- 14.30 All of these emissions will occur at the end of the Revised Proposed Development’s life, and it is likely, due to decarbonisation of the economy to meet the net zero 2050 target, that there will be mechanisms in place to ensure these are at least net zero. In any case, they have been reported for completeness but are not considered in the assessment of opening year emission.

Total GHG Emission Footprint

- 14.31 Table 14.5 summarises the GHG emissions for the Revised Proposed Development in the opening year for each footprint element. The GHG emissions from embedded materials used in construction are annualised based on the duration of the demolition, construction and retrofit works (assumed to be 9 years (see Paragraph 14.74 of the July 2024 ES) and a 60-year life. Annualising the embedded GHG emissions allows them to be compared on a like-for-like basis to the operational GHG emissions which are reported on a per annum basis.
- 14.32 As shown in Table 14.5, the Revised Proposed Development will result in a net increase in GHG emissions in the opening year of 10,199 tonnes.

Table 14.5 GHG Footprint for Revised Proposed Development for Opening Year ^a

Development Stage	Footprint Element	Baseline (tonnes CO ₂ e per annum)	Opening Year (tonnes CO ₂ e per annum)	Lifetime Emissions (tonnes CO ₂ e)
Construction	Embedded	0	5,803	52,224
	Transport	0	162	1,456
	Site Activities	0	585	5,261
Operation	Repair, Maintenance and Refurbishment	0	480	28,771
	Energy	0	638	4,821
	Transport	0	2,529	34,527
	Water Supply and Treatment	0	2	142
TOTAL		0	10,199	127,202
End of Life	Demolition; Waste transport, processing and disposal	-	-	4,104
Notes:				
^a All figures are rounded.				
^b All emissions to occur at the end of the life of the Development. This is not an annualised value.				

² ME Engineers (2024) The Aylesham Centre, Peckham Energy Statement and Overheating Assessment

³ GLA (2021) The London Plan 2021

Aylesham Centre Environmental Statement Addendum December 2024 Chapter 14: Climate Change and Greenhouse Gases

GHG Comparisons

14.33 As detailed in paragraph 14.102 of the Climate Change and Greenhouse Gases Chapter of the 2024 July ES, the IEMA guidance has been adopted to determine the likely significant effects of the Revised Proposed Development and considers the following three underlying principles to inform the assessment of significance.

Step 1: GHG Comparison

14.34 The first step in determining the likely significant effects is to contextualise the Revised Proposed Development's net GHG emissions to the UK-wide carbon budget⁴, the Greater London Authority (GLA)-wide GHG emissions total⁵, and the London Borough of Southwark's (LBS) borough-wide GHG emissions total⁶. This can be done for the demolition and construction phase of the Revised Proposed Development, as well as once complete and operational.

Demolition and Construction Phase GHG Comparison

14.35 The demolition, refurbishment and construction period has been based on 9 years.

14.36 Table 14.6 shows the GHG comparison between the demolition, refurbishment and construction phase of the Revised Proposed Development against the respective carbon budgets for the UK⁴, GLA⁵ area and the LBS⁶. As shown, the Revised Proposed Development will comprise no greater than 3% (when rounded) of GHG emissions from any budget, which is a commensurate contribution for a major development of this nature.

Table 14.6 GHG Comparison – Demolition and Construction Phase

	Budget (MT CO ₂ e)	Revised Proposed Development GHG Emissions (MT CO ₂ e)	% Comparison of Budget
2023 – 2027 (4 th Budget)			
LBS-wide	2.3	0.013	0.6
GLA-wide	112.0		0.01
UK-wide	1,950		0.001
2028 – 2032 (5 th Budget)			
LBS-wide	1.2	0.033	2.7
GLA-wide	90.0		0.04
UK-wide	1,725		0.002
2033 – 2037 (6 th Budget)			
LBS-wide	0.6	0.013	2.2
GLA-wide	-		-
UK-wide	965		0.001

14.37 It should be noted that all GHG emissions from the demolition, refurbishment and construction phase of the Revised Proposed Development are included in the budget comparisons, which is conservative as embedded carbon emissions are not considered within the GLA budget, and the LBS budget considers energy emissions only.

Completed and Operational Phase GHG Comparison

14.38 As previously discussed in this ES Chapter, the Revised Proposed Development is anticipated to be first occupied in 2028.

14.39 Table 14.7 shows the GHG comparison between the complete and operational Revised Proposed Development against the respective carbon budgets for the UK⁴, GLA⁵ area and the LBS⁶. As shown, the

Revised Proposed Development will comprise no greater than 2% (when rounded) of GHG emissions from any budget, which is a commensurate contribution for a major development of this nature.

Table 14.7 GHG Comparison – Complete and Operational Revised Proposed Development

	Budget (MT CO ₂ e)	Revised Proposed Development GHG Emissions (MT CO ₂ e)	% Comparison of Budget
2028 – 2032 (5 th Budget)			
LBS-wide	1.2	0.016	1.3
GLA-wide	90.0		0.018
UK-wide	1,725		0.0009
2033 – 2037 (6 th Budget)			
LBS-wide	0.6	0.012	1.9
GLA-wide	-		-
UK-wide	965		0.0012

14.40 As above, it should be noted that all GHG emissions from the complete and operational Revised Proposed Development are included in the budget comparisons, which is conservative.

Step 2: Consistency with Policy

14.41 There are no material changes to the local, regional and national policy comparisons of the Revised Proposed Development as presented in the July 2024 ES Climate Change and Greenhouse Gases Chapter.

London Plan Guidance: Whole Life-Cycle Carbon Assessments

14.42 Part F of the London Plan Policy SI 2 requires major applications to produce a WLCA, in accordance with GLA guidance and demonstrate actions to reduce life cycle carbon emissions. The GLA have provided several targets covering upfront embodied carbon (Modules A1-5), in-use and end of life carbon (Modules B-C) and life-cycle carbon (Modules A-C). This includes a standard benchmark and an aspirational benchmark, which are detailed in Table 14.8 below. Benchmarks for Residential use are used, as they are more stringent than the benchmarks for other proposed uses, and residential use comprises the largest component of the Revised Proposed Development.

14.43 The Revised Proposed Development's emissions for WLCA modules A1-5, B-C (excluding B6 & B7) and A-C (excluding B6 & B7) are also presented in Table 14.7 for comparison against the GLA's WLCA standard and aspirational benchmarks.

Table 14.8 GLA's WLCA Standard and Aspirational Benchmarks and the Revised Proposed Development's WLCA Emissions

	A1-5 (kg CO ₂ e/m ² GIA)	B-C (exc. B6 & B7) (kg CO ₂ e/m ² GIA)	A-C (exc. B6 & B7) (kg CO ₂ e/m ² GIA)
GLA WLCA Standard Benchmark – Residential	< 850	< 350	< 1,200
GLA WLCA Aspirational Benchmark – Residential	< 500	< 300	< 800
Revised Proposed Development's WLCA Emissions	556	310	853

14.44 As shown, the predicted upfront embodied carbon value (modules A1-A5) of 556 kg CO₂e/m² Gross Internal Area (GIA) for the Revised Proposed Development performs better than the GLA's WLCA standard benchmark but falls slightly short of the aspirational benchmark. The same can be said for modules B-C (excluding B6 and

⁴ DESNZ (2021) Carbon Budgets. Available: <https://www.gov.uk/guidance/carbon-budgets#setting-of-the-fourth-carbon-budget-2023-2027>

⁵ GLA (2023) London Environment Strategy Implementation Plan

⁶ The University of Manchester Tyndall Centre for Climate Change Research (2024) Setting Climate Commitments for Southwark. Available: <https://carbonbudget.manchester.ac.uk/reports/E09000028/>

B7), where the Revised Proposed Development performs better than the GLA's WLCA standard benchmark, but falls short of the aspirational benchmark.

14.45 Overall, therefore, the Amended Proposed Development performs better than the GLA's WLCA standard benchmark but falls short of the aspirational benchmark.

14.46 Taking account of the above, it is considered that the Proposed Development complies with the requirements of regional planning policy relevant to GHG emissions.

MITIGATION, MONITORING AND RESIDUAL EFFECTS

Demolition and Construction Mitigation

14.47 The Revised Proposed Development does not affect the mitigation and residual effects of the demolition and construction phase presented in the July 2024 ES chapter.

Completed Development

14.48 As discussed in the July 2024 ES chapter, to comply with Policy SI 2 of the London Plan³ and LBS' Local Plan⁷, carbon offset payments will be provided to reduce residual regulated CO₂ emissions to zero. The offset price is £95 per tonne for 30 years. Thus, for the Revised Proposed Development, as set out in the Energy Statement², the offsetting contribution will be £883,489.

14.49 The final residual opening year CO₂e emissions from the Revised Proposed Development's energy consumption when considering offsetting will be zero.

Monitoring

14.50 No monitoring is proposed to monitor the GHG effects of the Revised Proposed Development.

Residual Effects

14.51 The residual effects are the same as those identified in the July 2024 ES chapter. The GHG effects associated with the Revised Proposed Development are Minor Adverse and 'not significant'.

ASSESSMENT OF THE FUTURE ENVIRONMENT

Evolution of the Baseline

14.52 There is no material change to the evolved baseline conditions as presented in the July 2024 ES Climate Change and Greenhouse Gases Chapter.

Future Baseline Conditions

14.53 There is no material change to the future baseline conditions as presented in the July 2024 ES Climate Change and Greenhouse Gases Chapter.

CUMULATIVE EFFECTS ASSESSMENT

14.54 Since the preparation of the Climate Change and Greenhouse Gases Chapter of the July 2024 ES, there have been five new developments added to the cumulative list.

14.55 As discussed in the July 2024 ES chapter, GHG emissions from all projects will contribute to climate change globally, not just locally. As set out in the IEMA guidance:

"Effects of GHG emissions from specific cumulative projects therefore in general should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other".

14.56 This statement relates to 'cumulative' on a global scale. The definition of 'cumulative effects' in the context of GHGs and climate change therefore goes far beyond the typical definition of cumulative effects for EIA, which tends to focus on other proposed projects in the vicinity of the Proposed Development.

14.57 The cumulative contributions to climate change from GHGs will extend well beyond identified cumulative schemes. It is expected that mitigation will be provided, principally for embodied carbon during construction and operational energy and transport, which are policy compliant and work to minimise the on-site GHG emissions and reduce the lifetime GHG emissions of each cumulative scheme.

14.58 The residual cumulative GHG emissions from the cumulative schemes and the Proposed Development will likely be small in the context of local, regional and national GHG emissions, but as part of the wider cumulative effects of GHG emissions from all local, regional, national and global sources are nonetheless judged to be 'not significant' in accordance with IEMA guidance. As such, the conclusions of the Climate Change and Greenhouse Gases Chapter remain the same.

PART B LIKELY SIGNIFICANT EFFECTS

14.59 The likely significant effects remain the same as presented in the July 2024 ES and are these are described as Minor Adverse and therefore 'not significant'.

⁷ LBS (2022) *The Southwark Plan 2019-2036*

Chapter 15-17: Effect Interactions, Likely Significant Effects and Conclusions and Environmental Management, Mitigation and Monitoring Schedule

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Effect Interactions, Likely Significant Effects and Conclusions, Environmental Management, Mitigation and Monitoring

15.1 This section of the ES Addendum covers **ES Volume 1, Chapter 15 -17** of the July 2024 ES.

EFFECT INTERACTIONS (CHAPTER 15)

15.2 No additional effect interactions have been identified during the demolition and construction phase as a result of the Proposed Amendments. Therefore, the following significant effect interactions, as identified within the July 2024 ES, remain unchanged:

- A Significant Adverse temporary effect interaction to non-motorised users on-site due to combined traffic and transport (severance and delay) effects;
- A Significant Adverse temporary effect interaction to residential properties on Peckham High Street due to combined noise and vibration effects during Phase 2 of the demolition and construction works;
- A Significant Adverse effect interaction to residential properties at 112 and 114 Peckham High Street due to noise and vibration during Phase 2 of the demolition and construction works combined with daylight and sunlight effects;
- A Significant Adverse temporary effect interaction to residential properties above commercial units along Rye Lane due to combined noise and vibration effects; and
- A Significant Adverse temporary effect interaction to residential properties at 43 Rye Lane due to combined noise and daylight effects.

15.3 No additional effect interactions have been identified once the Revised Proposed Development is completed and operational. Therefore, the following significant effect interactions, as identified within the July 2024 ES remain unchanged:

- A Significant Beneficial effect interaction to non-motorised users on-site due to combined traffic and transport (severance, delay, amenity, fear and intimidation) effects;
- A Significant Adverse effect interaction to residential properties at 81 Hanover Park due to combined daylight and sunlight effects;
- A Significant Adverse effect interaction to residential properties at 112 Peckham High Street due to combined daylight and sunlight effects; and
- A Significant Adverse effect interaction to residential properties at 114 Peckham High Street due to combined daylight and sunlight effects.

LIKELY SIGNIFICAN EFFECTS AND CONCLUSIONS (CHAPTER 16)

15.4 No additional significant effects have been identified during demolition and construction as a result of the Proposed Amendments. The likely significant effects identified in July 2024 ES remain unchanged, as presented in Table 15.1.

15.5 Once the Revised Proposed Development is completed and operational, no additional significant effects have been identified. The likely significant effects identified in July 2024 ES remain unchanged, with the exception of the update to the number of homes provided as part of the Proposed Development, the elimination of the adverse wind microclimate effects identified in July 2024 ES and addition of a few isolated locations on balconies for wind-related comfort issues, as presented in Table 15.2.

Table 15.1 Likely Significant Effects – Demolition and Construction (Changes from July 2024 ES shown in Red)

EIA Topic Area	Receptor(s)	Description of Residual Effect	Classification of Residual Effect			
			Scale, Nature and Geographic Extent	D I	P T	St Mt Lt
Traffic and Transport	Non-Motorised Users (On-Site)	Severance of Communities.	Moderate Adverse (Local)	D	T	St

EIA Topic Area	Receptor(s)	Description of Residual Effect	Classification of Residual Effect			
			Scale, Nature and Geographic Extent	D I	P T	St Mt Lt
		Non-Motorised User Delay.	Moderate Adverse (Local)	D	T	St
Noise and Vibration	Receptor B – Commercial Units with Residential Properties above on Peckham High Street	Demolition and Construction Noise for Phase 2 – Timeslice 3.	Moderate Adverse (Local)	D	T	Mt
	Receptor L – Commercial Units with Residential Properties above on Rye Lane	Demolition and Construction Noise for Phase 2 – Timeslice 3.	Major Adverse (Local)	D	T	Mt
		Demolition and Construction Noise for Phase 2 – Timeslice 4.	Moderate Adverse (Local)	D	T	Mt
Archaeology	Later-Medieval Pits and Ditches	Complete Removal of Asset (Basement Construction and Piling).	Moderate Adverse (Local)	D	P	Lt
Ground Conditions and Land Contamination	Hydrogeology	Remobilisation and Creation of Contaminant Pathways to Controlled Waters.	(Negligible to) Minor Beneficial (Local)	D	T	St
	Hydrology (River Peck)			D	T	St
	Soils and Made Ground			D	T	St
	Superficial Deposits (Interglacial Lacustrine Deposits)			D	T	St
	Bedrock Geology (Lambeth, Thanet Sands and Chalk)			D	T	St
Wind Microclimate	Off-Site Bus Stop (P32)	Wind conditions windier than targeted for intended use (comfort).	Major Adverse (Local)	D	T	St
	Ten On-Site podium and terrace locations (P20, P87, P88, P89, P90, P91, P92, P93, P98 and P117)		Moderate Adverse (Local)	D	T	St
	On-Site Balcony Locations (P94, P95, P96, P97, P99, P100, P101, P102, P103, P104, P105, P106, P107, P108, P110, P111, P112, P114, P146, P147, P148, P149, P150)					
Built Heritage	Rye Lane Peckham Conservation Area	Changes to townscape character as a result of the demolition and construction of the Proposed Development.	Moderate Adverse (Local)	D	T	St
Townscape	Townscape Character Area A – Central Peckham, Retail, Civic and Leisure	Changes to townscape character as a result of the demolition and construction of the Proposed Development.	Moderate to Major Adverse (Local)	D	T	St

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EIA Topic Area	Receptor(s)	Description of Residual Effect	Classification of Residual Effect			
			Scale, Nature and Geographic Extent	D I	P T	St Mt Lt
Visual Impact	View 1 – One Tree Hill, Honour Oak Park	Changes to views as a result of the visible demolition and construction of the Proposed Development.	Moderate to Major Adverse (Local / Borough)	D	T	St
	View 4- Peckham Hill Street					
	View 5- Peckham Hill Street opposite Mountview Academy					
	View 10 – Peckham High Street (north side, at Melon Road);					
	View 17 – Peckham Square					
	View 30 – Peckham Levels – viewing platform					
	View 31 – Peckham Levels – Centre					
	View 32 – Bussey Building – West					
	View 33 – Bussey Building - East					
	View 6 - Peckham High Street, opposite Rye Lane junction	Changes to views as a result of the visible demolition and construction of the Proposed Development.	Moderate Adverse (Local / Borough)	D	T	St
	View 8 - Rye Lane / Hanover Park					
	View 9 - Rye Lane / Highshore Road					
	View 11 – Peckham High Street (south side, close to Bellenden Road)					
	View 12a – Peckham High Street (south side, west of Summer Road)					
	View 12b – Peckham High Street (south side, at Collyer Place/Persepolis Café)					
	View 16 – Surrey Canal Walk, near Lisford Street					
	View 35 – Peckham High Street, Outside M. Manze					
	Phase 1 Residents of the Proposed Development					
Notes						

EIA Topic Area	Receptor(s)	Description of Residual Effect	Classification of Residual Effect			
			Scale, Nature and Geographic Extent	D I	P T	St Mt Lt
Nature = Beneficial or Adverse Scale = Negligible / Minor / Moderate / Major Geographic Extent = Site or Local, District, Regional, National D = Direct / I = Indirect P = Permanent / T = Temporary St = Short Term / Mt = Medium Term / Lt = Long Term n/a = not applicable / not assessed						

Table 15.2 Likely Significant Effects – Completed Development (Changes from July 2024 ES shown in Red)

EIA Topic Area	Receptor(s)	Description of Residual Effect	Classification of Residual Effect			
			Scale, Nature and Geographic Extent	D I	P T	St Mt Lt
Socio-Economics	Housing Need within the Borough	Delivery of 877 new homes.	Moderate Beneficial (Borough)	D	P	Lt
		Delivery of 867 new homes	Major Beneficial (Local)	D	P	Lt
Traffic and Transport	Non-Motorised Users (On-Site)	Severance of Communities.	Moderate Beneficial (Local)	D	P	N/A
		Non-Motorised User Amenity; Fear and Intimidation.		D	P	N/A
Daylight, Sunlight and Overshadowing	Purdon House on Goldsmith Road	Reduction in Daylight Amenity.	Moderate Adverse (Local)	D	P	Lt
	Flamborough House, Clayton Road			D	P	Lt
	46 Hanover Park			D	P	Lt
	44 Hanover Park			D	P	Lt
	28 Hanover Park			D	P	Lt
	26 Hanover Park			D	P	Lt
	14 – 16 Hanover Park			D	P	Lt
	11 – 12 Robert Keen Close			D	P	Lt
	12 – 12A Rye Lane			D	P	Lt
	108 Peckham High Street			D	P	Lt
	112 Peckham High Street			D	P	Lt
	81 Hanover Park	Reduction in Daylight Amenity.	Major Adverse (Local)	D	P	Lt
	40 Hanover Park			D	P	Lt
	30 – 36 Hanover Park			D	P	Lt
	24 Hanover Park			D	P	Lt
	22 Hanover Park			D	P	Lt
	20 Hanover Park			D	P	Lt
	43 Rye Lane			D	P	Lt
	8 – 10 Rye Lane			D	P	Lt
	6 Rye Lane			D	P	Lt
	4 Rye Lane			D	P	Lt

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EIA Topic Area	Receptor(s)	Description of Residual Effect	Classification of Residual Effect			
			Scale, Nature and Geographic Extent	D I	P T	St Mt Lt
	2 Rye Lane			D	P	Lt
	5 Central Buildings			D	P	Lt
	81 Hanover Park	Reduction in Sunlight Amenity.	Major Adverse (Local)	D	P	Lt
	112 Peckham High Street		Moderate Adverse (Local)	D	P	Lt
	114 Peckham High Street			D	P	Lt
Wind Microclimate	One On-Site Entrance Location (P53)	Wind conditions windier than targeted for intended use (comfort).	Moderate Adverse (Local)	D	P	Lt
	Seven On-Site Outdoor Amenity Locations (P48, P49, P57, P58, P66, P97 and P69)					
	Eleven On-Site Podium/Terrace Locations (P4, P5, P20, P84, P86, P87, P89, P90, P91, P98 and P117)					
	On-Site Balcony Locations (P94, P95, P95, P97, P99, P100, P101, P102, P103, P104, P105, P106, P107, P108, P110, P112, P113, P115, P116, P119, P120, P122, P123, P125, P127, P129, P130, P131, P132, P134, P135, P137, P138, P139, P141, P146, P148, P149 and P150 (B1 to B34)					
	One Off-Site Entrance Location (P38)					
	Townscape Character Area A – Central Peckham, Retail, Civic and Leisure	Change to townscape character area.	Moderate to Major Beneficial (Local)	D	P	Lt
	View 4 - Peckham Hill Street	Changes to views experienced by visual receptors.	Moderate to Major Beneficial (Local)	D	P	Lt
Visual Impact	View 5 - Peckham Hill Street opposite Mountview Academy		Moderate to Major Beneficial (Local)	D	P	Lt
	View 6 - Peckham High Street, opposite Rye Lane junction		Moderate Beneficial (Local)	D	P	Lt
	View 8 - Junction of Hanover Park		Moderate Beneficial	D	P	Lt

EIA Topic Area	Receptor(s)	Description of Residual Effect	Classification of Residual Effect			
			Scale, Nature and Geographic Extent	D I	P T	St Mt Lt
			(Local)			
	View 9 - Junction of Hanover Park		Moderate Neutral (Local)	D	P	Lt
	View 10- Peckham Road (north side of road)		Moderate to Major Beneficial (Local)	D	P	Lt
	View 11 - Peckham Road (south side of road, west of 10)		Moderate Beneficial (Local)	D	P	Lt
	View 12a - Peckham Road (south side of road, west of view 11)		Moderate Adverse (Local)	D	P	Lt
	View 12b - Peckham Road (south side of road, west of 12a)		Moderate Neutral (Local)	D	P	Lt
	View 17- Peckham Square		Moderate to Major Beneficial (Local)	D	P	Lt
	View 19 - Highshore Road		Moderate Neutral	D	P	Lt
	View 29 - Clayton Road, looking along Hanover Park		Minor to Moderate Beneficial (Local)	D	P	Lt
	View 30 - Peckham Levels- viewing platform		Moderate to Major Neutral (Local)	D	P	Lt
	View 31 - Peckham Levels- centre		Moderate to Major Neutral (Local)	D	P	Lt
	View 32 - Bussey Building - west		Moderate to Major Neutral (Local)	D	P	Lt
	View 33 - Bussey Building - east		Moderate to Major Neutral (Local)	D	P	Lt
	View 35 - Peckham High Street, outside M. Manze		Moderate Beneficial (Local)	D	P	Lt
	Notes Nature = Beneficial or Adverse Scale = Negligible / Minor / Moderate / Major Geographic Extent = Site or Local, District, Regional, National D = Direct / I = Indirect P = Permanent / T = Temporary St = Short Term / Mt = Medium Term / Lt = Long Term n/a = not applicable / not assessed					

ENVIRONMENTAL MANAGEMENT, MITIGATION AND MONITORING (CHAPTER 17)

15.6 The mitigation and monitoring measures identified within the July 2024 ES (ES Volume 17: Environmental Management, Mitigation and Monitoring Schedule) remain unchanged as a result of the Proposed

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Amendments with the exception of Wind Microclimate. The following operational mitigation measures will be implemented:

Balcony Location	Exceedance	Mitigation Measure
B1	Summer Exceedance	1.5m High Balustrades
B2	Summer Exceedance	1.5m High Balustrades
B3	Summer Exceedance	1.5m High Balustrades
B4	Summer Exceedance	1.5m High Balustrades
B5	Summer Exceedance	1.5m High Balustrades
B6	Summer Exceedance	1.5m High Balustrades
B7	Summer Exceedance	1.5m High Balustrades
B8	Summer Exceedance	1.5m High Balustrades
B9	Summer Exceedance	1.5m High Balustrades
B10	Summer Exceedance	1.5m High Balustrades
B11	Summer Exceedance	1.5m High Balustrades
B12	Summer Exceedance	1.5m High Balustrades
B13	Summer Exceedance	1.5m High Balustrades
B14	Summer Exceedance	1.5m High Balustrades
B15	Summer Exceedance	1.5m High Balustrades
B16	Summer Exceedance	1.5m High Balustrades
B17	Summer Exceedance	1.5m High Balustrades
B18	Summer Exceedance	1.5m High Balustrades
B19	Summer Exceedance	1.5m High Balustrades
B20	Summer Exceedance	1.5m High Balustrades
B21	Summer Exceedance	1.5m High Balustrades
B22	Summer Exceedance	1.5m High Balustrades
B23	Summer Exceedance	1.5m High Balustrades
B24	Summer Exceedance	1.5m High Balustrades
B25	Summer Exceedance	1.5m High Balustrades
B26	Summer Exceedance	1.5m High Balustrades
B27	Summer Exceedance	1.5m High Balustrades
B28	Summer Exceedance	1.5m High Balustrades
B29	Summer Exceedance	1.5m High Balustrades
B30	Summer Exceedance	1.5m High Balustrades
B31	Summer Exceedance	1.5m High Balustrades
B32	Summer Exceedance	1.5m High Balustrades
B33	Summer Exceedance	1.5m High Balustrades
B34	Summer Exceedance	1.5m High Balustrades

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