

Appendix: EIA Methodology

Annex 1: EIA Scoping Report

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Appendix: Introduction

Annex 1: EIA Scoping Report

Annex 2: EIA Scoping Opinion

Annex 3: Cumulative Schemes



Aylesham Centre EIA Scoping Report

Prepared for:
Berkeley Homes (North East London) Ltd

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Trium Environmental Consulting LLP
The Whitehouse, Belvedere Road
London
SE1 8GA
+44 (0) 20 3887 7118
hello@triumenv.co.uk
www.triumenvironmental.co.uk

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INTRODUCTION

Overview

- 1 Berkeley Homes (North East London) Ltd (hereinafter referred to as the 'Applicant') is seeking full (detailed) planning permission for the redevelopment of an area of land located within the London Borough of Southwark ('LBS'). The land is currently occupied by the Aylesham Shopping Centre, comprising a Morrisons Supermarket and smaller retail units, associated car park, servicing areas and a petrol station (hereafter referred to as 'the site'). The site covers a total area of approximately 2.7 hectares (ha).
- 2 Figure 1 and Figure 2 show the site location plan and the draft planning application redline boundary respectively.
- 3 The proposed redevelopment of the site (hereafter referred to as the 'Proposed Development') will involve comprehensive phased redevelopment involving the demolition of existing buildings and provision of approximately 850 homes, 10,500m² (GIA) of flexible retail (and other E-class commercial/business/service use), learning and non-residential (Use Class F1), and drinking establishments, public house, wine bar (Sui Generis) floorspace and associated works. Further detail on the Proposed Development is presented in 'The Proposed Development and Planning Application' section of this EIA Scoping Report.
- 4 Given the nature of the scheme described, the Proposed Development falls within the classification of Schedule 2, 10(b) (Infrastructure Projects – Urban Development Projects) of the Environmental Impact Assessment Regulations (as amended)¹. Taking into account the scale of the redevelopment and the nature of the site and surrounding area, it is considered that there is the potential for significant environmental effects to arise. The Proposed Development is therefore considered to constitute 'EIA development' under the EIA Regulations, and so an Environmental Statement ('ES') will be prepared and submitted to accompany the planning application. No formal request for an EIA Screening Opinion has therefore been submitted to the LBS.
- 5 Trium Environmental Consulting LLP ('Trium') have been commissioned by the Applicant to undertake an EIA Scoping exercise for the redevelopment of the site in line with the requirements of the EIA Regulations and relevant EIA guidance. This includes submitting an EIA Scoping Opinion Request Report (hereafter referred to as the 'EIA Scoping Report' – this document) to the LBS that sets out the proposed scope of the EIA and the content and approach to preparing the ES that will be submitted to accompany the application for full planning permission.

¹ His Majesty's Stationary Office (HMSO) 2017. *The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017* (as amended in 2018 and 2020).

Figure 1 Approximate Site Location Plan

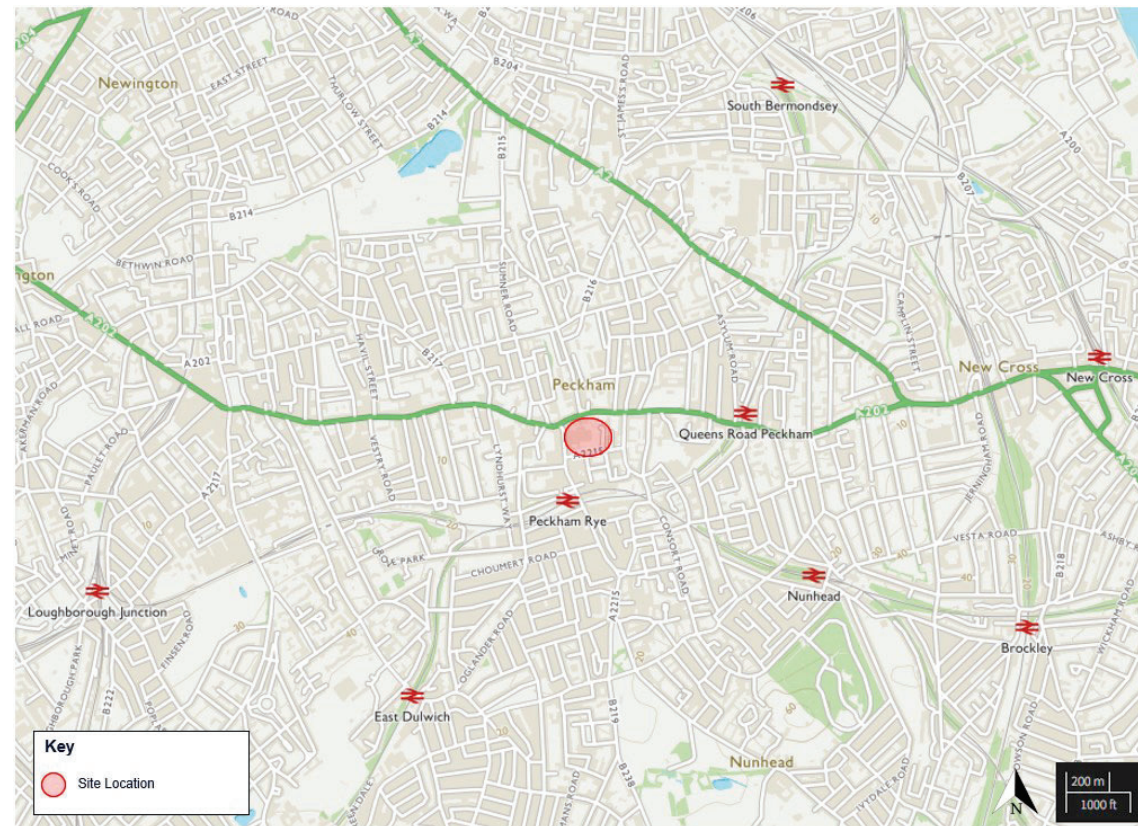
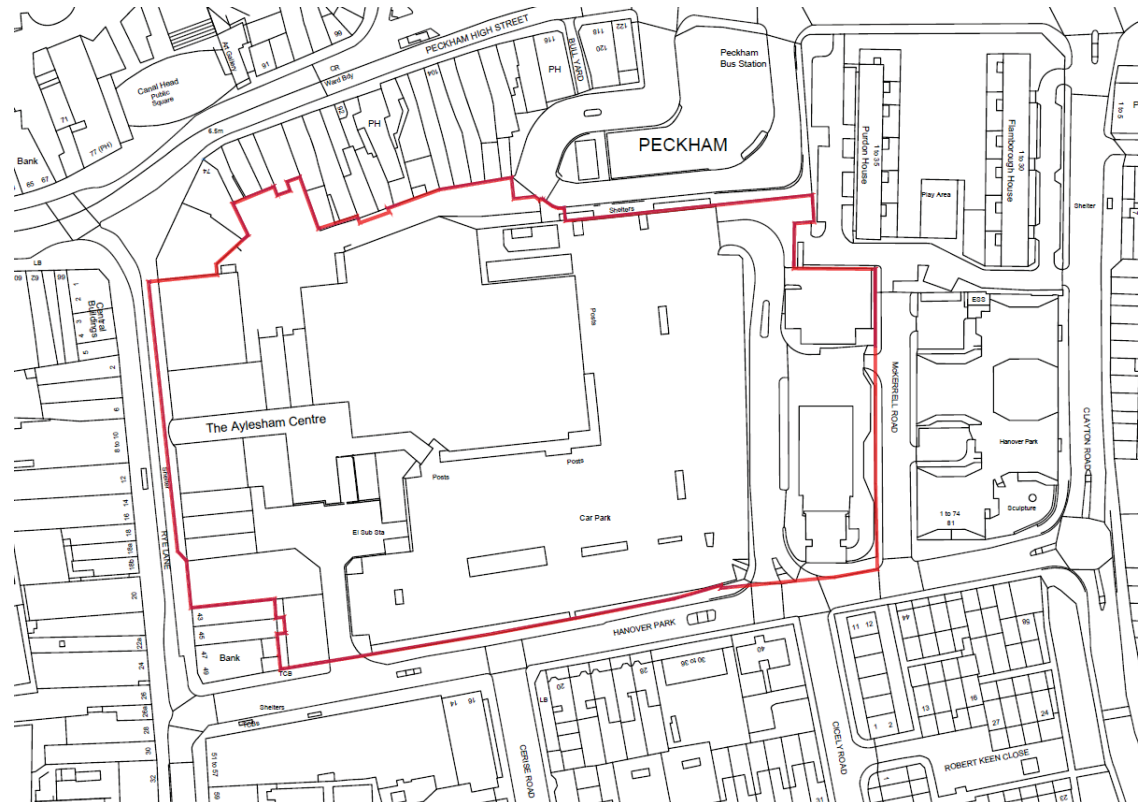


Figure 2 Draft Planning Application Redline Boundary



Structure Of This EIA Scoping Report

6 This EIA Scoping Report is structured as follows and provides:

- A description of the location and existing uses of the site;
- A description of the environmental context of the site and surrounding area;
- A description of the Proposed Development;
- A description of the EIA methodology and the approach to determining the significance of effects;
- A summary of the environmental topics that are considered to potentially result in significant effects on the environment and those that are considered unlikely to result in significant effects on the environment; and
- The proposed structure of the ES.

7 This Scoping Report is supported by the following Annexes:

- Annex A: Planning Policy Context;
- Annex B: Cumulative Schemes;
- Annex C: Topic Sheets:
 - The Topic Sheets provide further information on the environmental topics to be scoped into and out of the EIA.
 - For the topics that are considered to potentially result in significant effects on the environment, and are therefore scoped into the EIA, these include an explanation of the proposed scope and assessment methodology that will be adopted to predict the magnitude of potential impacts and the resultant scale, nature, geographic extent and duration of potential effects, and the effect significance.
 - For the topics that are considered unlikely to result in significant effects on the environment, and are therefore scoped out of the EIA, supporting evidence and justification is provided.
 - The Topic Sheets comprise the following technical topics:
 - Air Quality;
 - Archaeology (Buried Heritage);
 - Climate Change and Greenhouse Gases;
 - Daylight, Sunlight, Overshadowing, Light Spillage and Solar Glare;
 - Ecology and Biodiversity;
 - Ground Conditions and Land Contamination;
 - Human Health;
 - Land Take and Soils;
 - Noise and Vibration;
 - Project Vulnerability (Major Accidents and Natural Disasters);
 - Socio-Economics;
 - Townscape, Visual Impact and Heritage;
 - Traffic and Transport;
 - Waste and Materials;
 - Water Resources, Flood Risk and Drainage; and
 - Wind Microclimate.
- Annex D: Preliminary Ecological Appraisal;
- Annex E: Phase 1 Land Contamination Assessment.

THE SITE

- 8 The site is located within Peckham Town Centre and is centred at National Grid Reference: Easting 534245, Northing 176638 covering a total area of approximately 2.7ha.
- 9 The site currently comprises of the Aylesham Shopping Centre (made up of 19 individual non-residential units), which is connected to Morrisons Supermarket, as well as a petrol station, car park and associated serving areas. There is an existing basement which is located in the western areas of the site, underneath the Morrisons Supermarket and retail units along Rye Lane. There is approximately 10,300m² of non-residential/town centre uses on the site.
- 10 The site is bordered by:
 - Peckham Bus Station, several retail / residential units facing Peckham High Street to the north;
 - Rye Lane, beyond which lies retail / residential units and Lidl Supermarket and associated carpark to the west;
 - Hanover Park, beyond which lies low-rise residential and commercial units, as well as Rye Lane Baptist Church, to the south; and
 - McKerrel Road, beyond which lies multiple 6-storey residential blocks and Clayton Road, to the east.
- 11 The car park on the site provides 366 spaces and is accessed via Hanover Park, with pedestrian access predominantly through the shopping centre entrance on Rye Lane, or via Hanover Park and Peckham Bus Station. Existing servicing to the shopping centre is either from the road located to the north of the site, accessed from the bus station, or via a servicing yard directly off Hanover Park, to the south of the site.
- 12 The site is allocated (NSP74: Aylesham Centre and Peckham Bus Station) within the Southwark Plan² for the provision of a residential-led mixed use development. The Southwark Plan sets out the requirement for the provision of at least 850 new homes, including a mix of private and affordable tenures, and re-provision of at least the existing amount of commercial floorspace currently on the site and the supermarket use.
- 13 **Figure 3** provides photographs of the existing site and the surrounding area.

² London Borough of Southwark (2022); The Southwark Plan 2019-2036; Adopted February 2022

Figure 3 Photographs of the Site and Surrounding Area



Entrance to the Aylesham Centre



Retail Units Along Rye Lane



Petrol Station on Site



Peckham High Street



Entrance to Morrisons Supermarket



Rye Lane

ENVIRONMENTAL CONTEXT

- 14 The area surrounding the site is predominantly comprised of low to medium rise commercial and residential dwellings. There is a single 20-storey residential block to the west of the site, located off Clayton Road. The site does not lie within an environmentally sensitive area as defined by the EIA Regulations.
- 15 The site is allocated within the Southwark Plan (NSP74: Aylesham Centre and Peckham Bus Station) and is also located within the Peckham Area Vision (identified within the Southwark Plan), which provides a strategic vision for the future of Peckham. It is also located with Peckham Major Town Centre, as designated in Policy P35 Town and Local Centres of the Southwark Plan.
- 16 The site and surrounding area environmental context are described in **Table 1** and illustrated in **Figure 4**.

Table 1 Existing Environmental Context

Environmental Topic	Environmental Context
Air Quality	- The site lies within the Southwark Air Quality Management Area (AQMA), which encompasses the entire northern part of the borough, extending from Rotherhithe to Walworth and Camberwell and up to the boundary on the River Thames. The AQMA was declared in 2003 for exceedances in the annual mean of Nitrogen Dioxide (NO₂) and the 24-hour mean of Particulate Matter (PM₁₀); - The site is located within one of the Greater London Authority's Air Quality Focus Areas (Area 155 Peckham Town Centre)³; and - Further detail is provided within the Annex C: Air Quality Topic Sheet of this report.
Archaeology (Buried Heritage)	- The site is within the Tier 2 Peckham Village Archaeological Priority Area (APA4); - There are no scheduled monuments, registered parks and gardens, registered battlefields or world heritage sites within, or within close proximity to, the site; and - Further detail is provided within the Annex C: Archaeology Topic Sheet of this report.
Daylight, Sunlight, Overshadowing, Light Spillage and Solar Glare	- Daylight and Sunlight receptors in proximity of the site include a number of residential, including those located along Peckham High Street and Rye Lane; - Areas of surrounding open amenity space are considered as overshadowing receptors, including the amenity spaces associated with residential properties, such as Purdon House and Flanborough House located to the north east of the site, Wakefield House to the north and the courtyard to Peckham library to the north; - Drivers using Rye Lane, Hanover Park, the A202 and Clayton Road (A2215) are identified as potential solar glare receptors; and - Receptors have been listed in this scoping report within Annex C: Daylight, Sunlight, Overshadowing, Light Spillage and Solar Glare Annex Topic Sheet.
Ecology and Biodiversity	- The site is not within a 'sensitive area' (as defined in Part 1 of the EIA Regulations) and does not fall within the boundaries of any statutory or non-statutory sites. The nearest designated site is Nunhead Cemetery Local Nature Reserve which is approximately 1.5km south east of the site; - The site is located in a heavily urban context and so is considered to have low ecological value. The built structures and trees present on site have negligible potential to support roosting bats. The scattered trees across the site have some potential to support nesting birds. - There are multiple Sites of Importance for Nature Conservation (SINCs) in the surrounding area of the site, the closest being Surrey Canal Walk, which is located approximately 125m to the north; - An area of trees located to the south of the site are subject to a Tree Preservation Order (TPO) (TPO 509), and include a mixture of Maple, Ash and Cherry trees; and - Further detail is provided within Annex C: Ecology and Biodiversity Topic Sheet and the Annex D: Preliminary Ecological Assessment.

³ London Borough of Southwark (2017) Air Quality Strategy and Action Plan 2017-2022.

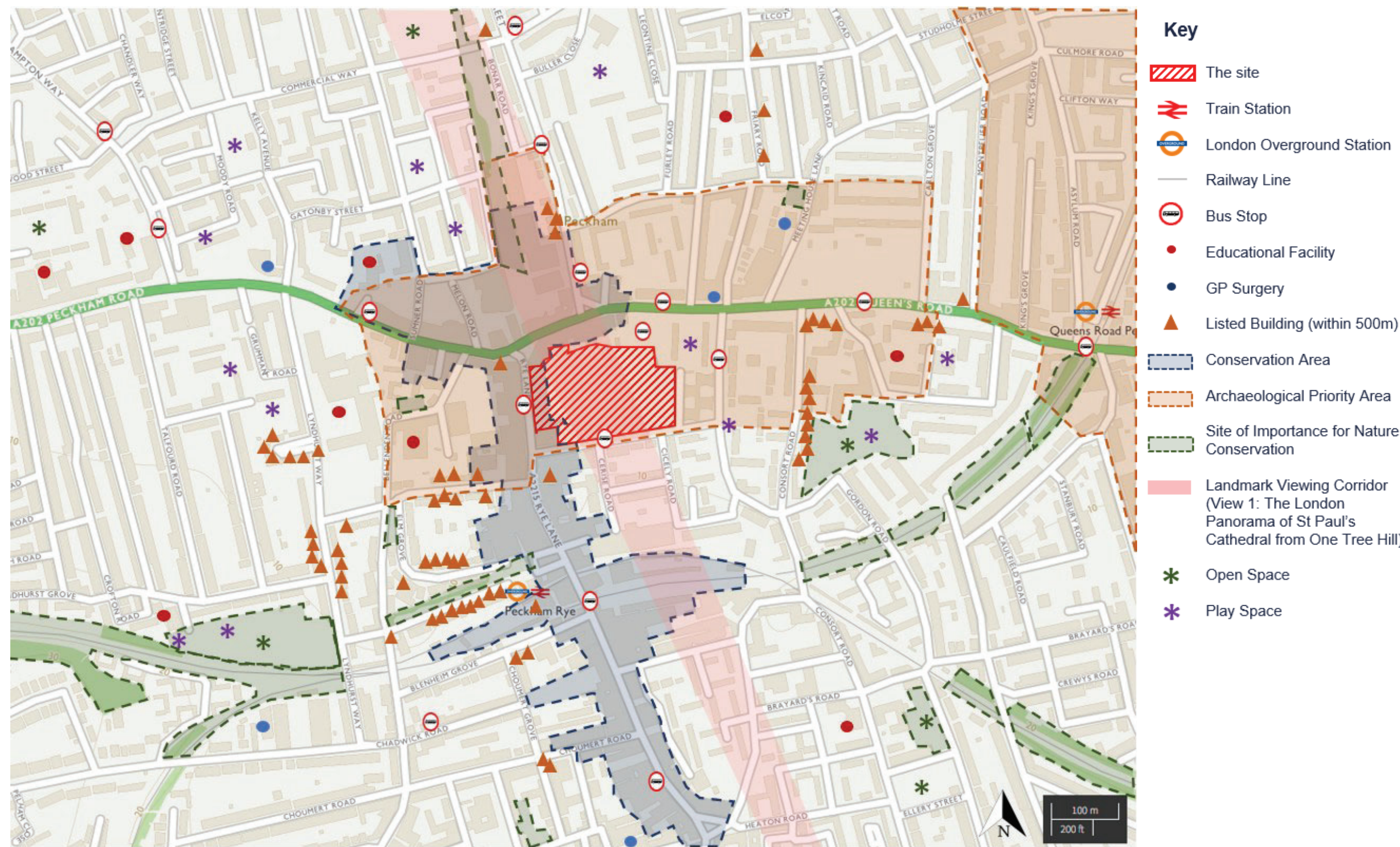
Environmental Topic	Environmental Context
Geoenvironmental	- There are historical and current potentially contaminative land uses on site including a historical garage, historical and current electricity substations, existing buildings on site, as well as an associated car park and petrol / car wash; - The site has a bedrock geology of Lambeth Group – clay, silt and sand and superficial deposits of Interglacial Lacustrine – clay and silt; - The Environment Agency's (EA) Groundwater Source Protection Zone Map (SPZs) confirms that the site is not located within a Groundwater Source Protection Zone; and - Further detail is provided within Annex C: Ground Conditions and Land Contamination Topic Sheet and Annex E: Phase 1 Land Contamination Assessment.
Noise and Vibration	- Noise receptors in the vicinity of the site include the existing and future residents, users of Peckham High Street Islamic Centre, Rye Lane Chapel, Peckham After School Club, community centres as well as retail and commercial areas; - The main noise source in the area is road traffic from the Peckham High Street and the bus station to the north, Rye Lane to the west and Clayton Road to the east, as well as the railway to the south; and - Further detail is provided within Annex C: Noise and Vibration Topic Sheet.
Social Infrastructure (Education, Community, Healthcare and Open/Play Spaces)	- The site includes several retail and commercial businesses, including Morrisons Supermarket; - Peckham After School Club is located north of the site along Peckham High Street; - Peckham High Street Islamic Centre is located north of the site on Peckham High Street and Rye Lane Chapel is approximately 50m south of the site; - Peckham Library is located approximately 150m north of the site; - The nearest school is the Cherry Garden School, which is a community special primary school, located approximately 160m west of the site and Harris Academy Peckham secondary school, approximately 240m west of the site; - The nearest GP is the Acorn and Gaumont House Surgery on Peckham High Street, approximately 100m from the site; - Jocelyn Street Park is located approximately 200m to the north west, Holly Grove Shrubbery approximately 220m to the south west and Cossall Park is 350m to the east; and - Further detail is provided within the Annex C: Socio-Economics Topic Sheet.
Townscape and Heritage	- The site falls partially within the Rye Lane Peckham Conservation Area. This also adjoins the Holly Grove Conservation Area to the west and Peckham Hill Street Conservation Area to the north; - The site also partially falls within the Peckham Townscape Heritage Initiative Area⁴; - There are no designated heritage assets within the site. However the Jones and Higgins Clock Tower located north of the site, outside of the planning application boundary, is identified as an important undesignated heritage asset. - The site falls within popular viewpoints at the Bussey building and Frank's Café when looking towards the City and the protected viewpoint from One Tree Hill towards St Paul's Cathedral; - There are 69 listed buildings within 500m of the site, the closest being the Grade II Baptist Chapel on Rye Lane and Grade II 58 Peckham High Street; and - Further detail is provided within Annex C: Townscape, Visual Impact and Heritage Topic Sheet.

⁴ The Peckham Townscape Heritage Initiative is a project funded by the Heritage Lottery Fund and Southwark Council which aims to contribute to the improvement of Peckham's town centre. Funding is available for the repair, re-use and restoration of forty of the historic buildings within the Rye Lane Peckham Conservation Area.

Environmental Topic	Environmental Context
Traffic and Transport	• The site has a Public Transport Accessibility Level (PTAL) rating of 6a to 6b (where 0 = worst and 6b = highest) demonstrating the high level of accessibility of the site via public transport; • The main vehicular access point to the site is achieved from Hanover Park (to the south of the site), with servicing access to the north of the site, accessed from the bus station; • Peckham Bus Station is situated to the north of the site, accessed from Peckham High Street. Aylesham Centre Bus Station is located on Hanover Park and serves the 37, 63, 78, 197, 363, N63, P12 an P13 bus services; • Peckham Rye Railway Station is the nearest train station to the site (approximately 300m to the south west) which operates London Overground services to Dalston Junction and Clapham Junction, as well as National Rail services, including those to Dartford, London Bridge, Sevenoaks and Victoria; • A Sheffield Cycle Stand is located on site, and three are located along Rye Lane to the west of the site; • Cycle Superhighway 5 (CS5) is located to the north of the site, along Peckham High Street. Local Cycle Network 22 is located to the west of the site, along Highshore Road and Bellenden Road; and • Further detail is provided within Annex C: Traffic and Transport Topic Sheet.
Water	• The site is located within Flood Zone 1, properties within Flood Zone 1 have a low probability of flooding from rivers and the sea; • The Southwark Strategic Flood Risk Assessment (SFRA) identifies that the Thames Tidal Defence system provides the borough with a significant standard of protection from combined fluvial and tidal flooding, up to the 1 in 1000-year event. • The Environment Agency (EA) risk of flooding from surface water map shows that the majority of the site has a very low risk of flooding from this source, however there are isolated areas with up to high risk of flooding within the south-western extent of the site; • The site is located in a Critical Drainage Area⁵; • The River Ravensbourne is approximately 3km east of the site and the River Thames is located approximately 3.1km to the north of the site; • There is a Secondary A aquifer crossing the site, which comprises permeable layers that can support local water supplies and may form an important source of base flow to rivers; • The site is within an area classified as medium-low groundwater vulnerability; and • Further detail is provided within the Annex C: Water Resources, Flood Risk and Drainage Topic Sheet of this report.

⁵ The Southwark Strategic Flood Risk Assessment defines a Critical Drainage Area as “a discrete geographic area where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding during severe weather, affecting people, property or local infrastructure”.

Figure 4 Environmental Context



THE PROPOSED DEVELOPMENT AND PLANNING APPLICATION

Overview of the Proposed Development

- 17 The design of the Proposed Development is ongoing at the time of preparing this EIA Scoping Report, however it is anticipated to comprise of the demolition of the existing buildings on site and phased construction of residential, retail and commercial uses and associated works.
- 18 The Proposed Development is anticipated to demolish the existing buildings and provide:
 - Approximately 850 residential units – Land Use Class C3;
 - The reprovision of the Morrisons supermarket, with approximately 4,500m² of retail floorspace – Land Use Class E(a);
 - Up to approximately 10,500m² GIA of non-residential uses including flexible Commercial, Business and Service (Land Use Class E (excluding E(g)(iii)); Learning and Non-Residential Institution (Land Use Class F1); and Drinking Establishments, Public Houses, Wine Bar (Sui Generis);
 - Construction of new buildings varying in height between approximately 4 and up to 20 storeys, with a single-storey basement providing associated car and cycle parking;
 - Public and communal amenity space (including play space);
 - Landscaping and public realm works;
 - Associated car and cycle parking;
 - Improved access including cycle and pedestrian routes through the site;
 - Provision of internal vehicle access routes;
 - Associated highways infrastructure;
 - Associated servicing facilities, plant and ancillary;
- 19 It is anticipated that the demolition and construction programme will be phased across two key phases. Where appropriate, occupants of the early completed phases will be considered as sensitive receptors during the later construction phases. The demolition and construction programme is still being developed as the scheme evolves, however, it is anticipated that it will be phased over a period of approximately 8 years. An indicative demolition and construction programme will be presented within the ES.
- 20 The Applicant is currently undertaking a comprehensive programme of consultation with the public and the LBS which may result in changes to the Proposed Development detailed above. Any changes to the Proposed Development would not be of sufficient scale to alter the technical assessment methodologies presented within this EIA Scoping Report, nor the scope of the ES.

SCOPE OF THE EIA

EIA Methodology

- 21 This EIA Scoping Report constitutes a formal request for an EIA Scoping Opinion from LBS. EIA Scoping refers to the process of identifying those environmental aspects that may be significantly affected by the Proposed Development. In doing so, the potential significance of effects associated with each environmental aspect becomes clearly defined, resulting in the identification of issues to be addressed in the EIA (i.e., these aspects are 'scoped in' to the ES).
- 22 Defining the scope of an EIA is an important part of the overall EIA process and is recommended by best practice. In accordance with Regulation 15 of the EIA Regulations and current EIA best practice, this EIA Scoping Report sets out the following information to assist LBS in formulating its EIA Scoping Opinion:
 - A plan sufficient to identify the land;
 - Brief description of the nature, purpose, size and scale of the Proposed Development;
 - The proposed approach to the EIA;
 - Consultation that will be undertaken as part of the EIA;
 - The key environmental issues identified in respect of the Development;
 - A summary description of the likely significant environmental effects of the Development, together with the approach and methodology for assessing them; and
 - The intended structure of the ES.
- 23 The Applicant has provided information on the baseline and key issues for each technical topic, where topics are considered likely to result in significant environmental effects (i.e. 'scoped in'), the technical topics have provided their scope of assessment and cumulative assessment approach. This is provided in Annex C: Topic Sheets.

Use of Competent Experts

- 24 The EIA Regulations require that in order to ensure the completeness and quality of the ES, '(a) the developer must ensure that the environmental statement is prepared by competent experts' and '(b) the environmental statement must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts'. Trium considers that these requirements are equally important and relevant to the EIA scoping process in addition to the preparation of the ES. As such, in accordance with this requirement, the following statement is provided:

"Trium is an environmental consultancy specialising in urban regeneration and property development projects in the UK. Trium's partners and employees have extensive experience in managing the environmental issues and impacts surrounding large scale, high profile urban regeneration development projects. The partners and employees of Trium have, over the course of their careers to date (including with former employers), project directed, managed or contributed to over 450 EIAs within the retail, residential, leisure, commercial, cultural, infrastructure and industrial sectors. Trium's lead EIA practitioner for this project has over 20 years of EIA experience, predominantly focussing on major urban regeneration projects."
- 25 Information on Trium's expertise, as well as that of the technical contributors to the EIA, will be detailed within the ES.

EIA Purpose and Process

- 26 EIA is a process carried out which examines available environmental information to ensure that the likely significant environmental effects of certain projects are identified and assessed before a decision is taken on whether a project is granted planning permission. This means environmental issues can be

identified at an early stage and projects can then be designed to avoid or to minimise significant environmental effects, and appropriate mitigation and monitoring can be put in place.

- 27 Regulation 4 of the EIA Regulations sets out the EIA process. Specifically, Regulation 4(2) states that *“the EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors:*

(a) population and human health;

(b) biodiversity;

(c) land, soil, water, air and climate;

(d) Material assets, cultural heritage and the landscape;

(e) The interaction between the factors referred to in sub-paragraphs (a) to (d).”

- 28 The potential for likely significant effects on the below topic areas, during both the demolition and construction works associated with the Proposed Development and once the Proposed Development is complete and operational, have been considered:

- Air Quality;
- Archaeology (Buried Heritage);
- Built Heritage, Townscape and Visual;
- Climate Change and Greenhouse Gases;
- Daylight, Sunlight, Overshadowing, Light Spillage and Solar Glare;
- Ecology and Biodiversity;
- Ground Conditions and Land Contamination;
- Health;
- Land Take and Soils;
- Noise and Vibration;
- Project Vulnerability (Major Accidents and Disasters);
- Socio-Economics;
- Traffic and Transport;
- Waste and Materials;
- Water Resources, Flood Risk and Drainage; and
- Wind Microclimate.

The Scoping Process

- 29 EIA Scoping forms one of the first stages of the EIA process. Requesting an EIA Scoping Opinion from a local planning authority (in this case the LBS), under Regulation 15 of the EIA Regulations, involves the preparation of an EIA Scoping Opinion Request Report (or EIA Scoping Report) and its submission to the local planning authority is part of a formal request for their opinion on the content or ‘scope’ and approach to the EIA.

- 30 The purpose of scoping is to identify:

- The important environmental issues and topics for consideration in the EIA;
- The baseline conditions and assessment methodology to be used for assessment;
- Any potentially sensitive receptors that may be affected by the development being proposed;

- The appropriate space boundaries of the EIA: the site boundary and surrounding environmental context;
- The information necessary for decision-making; and
- The topics of which could result in potential significant effects from the development both during its demolition and construction and operation.

- 31 In accordance with the requirements of the Town and Country Planning (Development Management Procedure) Order 2015 (article 18, Schedule 4), this Scoping Report will need to be issued by the local planning authority to the statutory consultees that are considered to have an interest in the EIA of the Proposed Development and should be consulted as part of the EIA Scoping process. It is expected that the local planning authority will also issue the Scoping Report to non-statutory and key, local stakeholders and interest groups who are deemed to similarly have an interest in the EIA of the Proposed Development.

- 32 The process of consultation is a key requirement of the EIA process and the views of statutory consultees and other stakeholders help to identify specific issues, as well as identifying additional information in their possession, or of which they have knowledge, which may be of assistance in progressing the EIA.

- 33 The ES will append the EIA Scoping Report (this document) and EIA Scoping Opinion and include a summary of any other consultation undertaken as part of the EIA process.

EIA Methodology and Approach to Assessment of the Proposed Development

- 34 In addition to the EIA Regulations, there is also guidance available that has been referenced where appropriate, including but not limited to:

- At a European level, reference has been made to the European Commission’s (EC) various EIA guidance documents available here: <http://ec.europa.eu/environment/eia/eia-support.htm>;
- At a domestic level, reference has been made to the Ministry of Housing, Communities and Local Government (MHCLG) overarching PPG;
- In addition, the Highways England, 2020, Design Manual for Roads and Bridges ‘Sustainability and Environment’ – LA104 Environmental assessment and monitoring has been referred to as applicable;
- In relation to publications from professional bodies, reference has been made to IEMA publications as these include best practice/suggested improvements to the EIA process. This includes:
 - IEMA ES Review Criteria (COM3-6)⁶;
 - IEMA ‘Environmental Assessment of Road Traffic’ (1993)⁷; and
 - IEMA ‘Guidelines for Environmental Impact Assessment’ (2004)⁸;
 - IEMA ‘Special Report into the State Environmental Impact Assessment Practice in the UK’ (2011)⁹;
 - IEMA ‘Shaping Quality Development’ (2015)¹⁰;
 - IEMA ‘Delivering Quality Development’ (2016)¹¹;
 - IEMA ‘Delivering Proportionate EIA’ (2017)¹²;
 - IEMA ‘Guide to Materials & Waste in EIA’ (2020)¹³;

⁶ Institute of Environmental Management and Assessment, undated; EIA Quality Mark – ES Review Criteria COM 3-6.

⁷ Institute of Environmental Management and Assessment, 1993 ‘Environmental Assessment of Road Traffic’

⁸ Institute of Environmental Management and Assessment, 2004, Guidelines for Environmental Impact Assessment.

⁹ Institute of Environmental Management and Assessment, 2011. The State of Environmental Impact Assessment Practice in the UK.

¹⁰ Institute of Environmental Management and Assessment, November 2015. Shaping Quality Development.

¹¹ Institute of Environmental Management and Assessment, 2016; Delivering Quality Development.

¹² Institute of Environmental Management and Assessment, 2017; Delivering Proportionate EIA

¹³ Institute of Environmental Management and Assessment, 2020; Guide to Materials and Waste in Environmental Impact Assessment

- IEMA 'Climate Change Resilience and Adaption' (2020)¹⁴;
- IEMA 'Major Accidents and Disasters Guidelines' (2020)¹⁵;
- IEMA 'Principles of Cultural Heritage Impact Assessment in the UK' (2021)¹⁶
- IEMA 'Assessing Greenhouse Gas Emissions and Evaluating their Significance: 2nd Edition' (2022)¹⁷; and
- IEMA 'A New Perspective on Land and Soil in Environmental Impact Assessment' (2022)¹⁸.

- Whilst primarily written for major infrastructure projects, reference is also made to guidance/advice notes published by the National Infrastructure Planning where appropriate; and
- Applicable case law.

35 The method behind the EIA process generally¹⁹ takes into account the existing conditions of the area into which the development is being introduced (**the baseline**) and makes reasonable predictions of the likely change (**the impact** – in terms of magnitude) that may occur, during both its construction and when the development is completed and operating as proposed. The predicted impact is considered in terms of key environmental and social aspects (**receptor / resource**) found within the surrounding area, and based on their sensitivity to change, the resulting change experienced by the receptor / resource (**the effect**) is then determined. Any mitigation measures required in order to reduce or eliminate adverse effects are then considered and assessed, with the residual effect being determined as significant or not. The likely significant effects are then reported (within an **environmental statement**) for consideration by the relevant planning authority when considering whether to grant planning permission for a development.

Alternatives and Design Evolution

- 36 In addition, the EIA Regulations require (Schedule 4) that the ES provides “a description of the reasonable alternatives [...] relevant to the proposed project and its specific characteristics” which have been considered by the Applicant and “an indication of the main reasons for selecting the chosen option, including comparison of environmental effects”.
- 37 The ES will summarise the evolution of the Proposed Development, any alternatives considered, and key modifications made during the design process. Environmental considerations which have influenced this process will be discussed, and a qualitative comparison will be undertaken of the different design options and their relevant environmental effects, as relevant. Matters that will be considered in terms of design evolution include land uses, layout, building heights and massing. The preferred design, culminating with the Proposed Development being sought for approval, will be discussed.
- 38 A specific chapter, **ES Volume 1, Chapter 3: Alternatives and Design Evolution**, will focus on the consideration of the main alternatives (as relevant) and the design evolution. The focus will be on main alternatives considered (as relevant), the evolution of the design, and how environmental considerations influenced the evolution of the scheme. The summary of the design evolution will also consider initial environmental analysis undertaken on the evolving scheme.

Assessment Scenarios

- 39 The ES will consider the following main assessment scenarios:
- Baseline Year - of 2023 (or an alternative baseline year as identified within the technical assessments);

¹⁴ Institute of Environmental Management and Assessment, 2020; Climate Change Resilience and Adaption

¹⁵ Institute of Environmental Management and Assessment, 2020, Major Accident and Disasters Guidelines

¹⁶ Institute of Environmental Management and Assessment, 2021; Principles of Cultural Heritage Impact Assessment in the UK

¹⁷ Institute of Environmental Management and Assessment, 2022, Assessing Greenhouse Gas Emissions and Evaluating their Significance: 2nd Edition

¹⁸ Institute of Environmental Management and Assessment, 2022, A New Perspective on Land and Soil in Environmental Impact Assessment

¹⁹ There may be exceptions to the general approach described. Where there are exceptions, this will be clearly described within the relevant methodology section, outlining both the departure from the general EIA methodology and the description of the alternative approach.

- Demolition and Construction;
- Phasing – As relevant for each technical assessment;
- Opening Year – opening year of the fully completed and operational development; and
- Cumulative – the Proposed Development with other surrounding development schemes, often referred to as 'cumulative schemes'.

40 Where any future years are required to be assessed by the technical assessments, these will be clearly identified within the relevant technical ES Chapters.

Baseline Conditions

- 41 Baseline assessments will utilise any existing and available information, as well as new information either collected through baseline surveys undertaken during the EIA process or additional information provided as part of the EIA Scoping Opinion and consultation process. This information will be used to present within the ES (within the individual technical chapters) an up to date description of the current baseline conditions of the site and surrounding area.
- 42 In accordance with industry best practice, some assessments (such as traffic and transport and air quality) when assessing the effects of the operation of the Proposed Development will include a projected environmental condition in the future (i.e. 'future baseline'), at the projected year of opening of the Proposed Development (if relevant a different future year appropriate/specific for the technical assessment may be used). Where using a future baseline is more appropriate, this will be detailed in the relevant methodology of the technical assessment and be made clear in the ES.
- 43 In addition, as per the requirements of the EIA Regulations, consideration as to how the current baseline conditions may evolve in the future in the absence of the Proposed Development will also be presented in the ES (within the individual technical chapters). This likely evolution of the baseline conditions will be considered qualitatively, supplemented by quantitative information where relevant and will be used to support the assessment of cumulative development effects.

Covid-19

- 44 As a result of the Covid-19 situation over the past few years, where government restrictions may have affected baseline survey data resulting in atypical baseline (such as local council air quality monitoring data), alternate sources of information will be used within the ES. Where technical assessments rely upon this data, the data used will be clearly identified and explained.

Sensitive Receptors

- 45 When undertaking an EIA, it is important to identify potential environmental receptors which may be impacted by the Proposed Development and may need to be considered as part of the assessment.
- 46 The environmental receptors that may be sensitive to change are identified and discussed within the scope of each technical topic in this Scoping Report (hereafter referred to as 'sensitive receptors'). The sensitive receptors outlined within this Scoping Report have been identified at the time of writing as part of the EIA scoping process, however these will be reviewed during preparation of the ES and may be subject to change.

Demolition and Construction Impact Assessments

- 47 The ES (within an ES chapter titled 'Demolition and Construction' in Volume 1) will provide an outline of the anticipated demolition and construction phasing and programme and related activities and aspects (i.e. demolition works, substructure works, superstructure works etc., waste volumes and construction material quantities, Heavy Goods Vehicle (HGV) movements and HGV routing). In addition, key environmental controls and management measures relevant to the Proposed Development (including relevant codes of construction practice) will be presented. Whilst the demolition phasing and programme is still being developed the phasing will be considered within the technical assessments where applicable (including where there may be times of partial occupation whilst construction works are ongoing).

- 48 This information will inform the demolition and construction impact assessments. It is noted that demolition and construction information at the planning stage is necessarily broad (as specific demolition and construction specifications have not yet been prepared and often a contractor not yet appointed) and so may be subject to modification during any future detailed demolition and construction planning. For this reason, information is based on reasonable conservative assumptions and the collective substantial experience of the Applicant and EIA Team with similar projects to make sure reasonable worst-case demolition and construction impact assessments are undertaken. Throughout the demolition and construction impact assessments, the assumption will be made that the standard environmental controls required under legislation and best practice guidance are met as a matter of course.
- 49 The assessment of the potential for likely significant effects arising during the demolition and construction works will be addressed within each of the individual technical assessment chapters of the ES. Defined baseline conditions will be considered and will, as appropriate / relevant, take into account the phased demolition and construction works and subsequent use of the completed Proposed Development. The demolition and construction assessments presented within the technical chapters of the ES will identify the need for any additional or bespoke environmental management or mitigation measures in order to avoid, prevent, reduce or off-set any significant adverse effects identified.
- 50 Where required, a description of any proposed monitoring arrangements will also be presented and would define (where appropriate) the procedures regarding the monitoring of the relevant significant adverse effects, the types of parameters to be monitored and the monitoring duration.
- 51 All the measures proposed within the technical chapters will be compiled and presented in a mitigation and monitoring schedule (to be presented as a separate chapter within the ES).
- 52 It is anticipated that any required demolition and construction related environmental management / mitigation and monitoring measures would be secured and controlled through an appropriate Construction Environmental Management Plan ('CEMP') (or equivalent) and it is proposed that the requirement for this document be secured by means of suitably worded planning conditions to be attached to the permission (if granted). Key mitigation and management controls that would later form part of a CEMP will be presented in the ES to help define the policies, procedures and management framework for the implementation of any identified specific environmental management and mitigation controls and monitoring.

Phasing

- 53 Given the scale of the Proposed Development and duration of the phasing, an indicative Phasing Plan will be submitted with the planning application and an assessment of potential effects during construction and operation of the various phases will be conducted where appropriate.
- 54 The requirement for a phased assessment will be considered on a topic-by-topic basis as relevant.

Completed Development Impact Assessments

- 55 The ES will present a description of the Proposed Development within **ES Volume 1, Chapter 4: The Proposed Development**. Sufficient information on the Proposed Development will be presented to allow an understanding of the development being proposed, in order to enable the assessment of potential and likely significant environmental effects of the completed and operational development. Any assumptions made will be clearly presented in the narrative. The Proposed Development will be the subject of plans, sections and elevations and these will be used as the basis of the assessment of the likely environmental and socio-economic effects within the ES.
- 56 The EIA will also assess the amount of development across the mix of uses sought for approval. Any flexibility sought in respect of Use Class E will be appropriately assessed.

Environmental Design Management Measures

- 57 Throughout the EIA (including this EIA Scoping Report and the ES), where applicable, the way that likely environmental effects have been or will be avoided, prevented, reduced or offset through design and/or management measures will be described. These are measures that are inherent in the design and construction of the Proposed Development (also known as 'embedded measures').

- 58 Embedded measures relevant to the construction phase will be summarised within **ES Volume 1, Chapter 17: Mitigation and Monitoring Schedule**. These measures are to be included within a CEMP, the requirement for which is proposed to be secured via an appropriate planning condition.
- 59 For the operational phase, such embedded measures will be integral to Proposed Development. A number of technical studies (e.g. ecology, drainage and flood risk) have been undertaken to inform the design and allow early identification of mitigation measures so that these can be incorporated into the Proposed Development. Embedded measures are therefore either incorporated into the design from the outset or identified through the assessment process. Proposed environmental enhancements will also be described, where applicable. The development of the masterplan will be informed by a series of workshops which have involved a wide range of environmental specialists to ensure that constraints and opportunities have been properly identified, understood and incorporated into the masterplan design.
- 60 Embedded measures will be considered prior to the assessment of effects to avoid considering assessment scenarios that are unrealistic in practice, i.e. do not take account of such measures even though they are likely to be standard practice and/or form part of the proposed design. These will then be followed through the assessment to ensure that realistic likely environmental effects are identified. Where likely significant adverse effects are identified after considering these embedded measures, 'further mitigation measures' will be proposed.
- 61 All embedded mitigation and enhancement measures will be described within the Proposed Development Chapter of the ES with the rationale for the inclusion of the identified embedded measures and the associated commitment to implementing such measures clearly stated. In addition, mitigation and enhancement measures and any monitoring requirements will be summarised within **ES Volume 1, Chapter 17: Mitigation and Monitoring Schedule**.

Cumulative Effects and Effect Interactions

- 62 The EIA will identify the potential for (a) Cumulative Effects and (b) Effect Interactions which are described below.

Cumulative Effects

- 63 The cumulative assessment will be based on the information available on the local authorities planning register. Generally, the schemes (referred to as 'cumulative schemes') to be included within the cumulative effects assessment will be within 1km of the site and either have:
- Full planning consent; or
 - A resolution to grant consent; and
 - An uplift of more than 10,000 square meters GEA of mixed-use floorspace or, provide over 150 residential units; or
 - Office to residential conversions (granted under the General Permitted Development Order) giving rise to over 150 residential units.
- 64 By applying an initial screening exercise (using the above criteria) to all the surrounding redevelopment schemes, the cumulative effects assessment of the EIA becomes more focused on the larger schemes (i.e. those with the most potential to interact in a cumulative manner).
- 65 A preliminary list of cumulative schemes for consideration within the EIA has been identified and is presented in **Annex B: Cumulative Schemes**. As part of this EIA scoping process, the local authority (and other consultees, as relevant) are invited to comment on the proposed cumulative schemes, so that the list of cumulative schemes can be agreed.
- 66 Each technical chapter of the ES will consider the potential for cumulative effects associated with the schemes identified for inclusion within the cumulative effects assessment. Each technical ES Chapter will be clear on the cumulative schemes that have been considered within the cumulative effects assessment.

- 67 Other schemes that are under construction, where the construction works are significantly progressed (i.e. likely to be completed before the opening year of the Proposed Development / first occupation on site) or where early phases are occupied, will be factored into the baseline scenario for assessment.

Effect Interactions

- 68 Effect interactions occur as interactions between effects associated with just one project, i.e. the combination of individual effects arising as a result of the Proposed Development, for example effects in relation to noise, airborne dust or traffic on a single receptor.
- 69 Effect Interactions from the Proposed Development itself on particular receptors at the site and within the surrounds will be considered during the demolition and construction works and also once the Proposed Development is completed and operational. Dependent on the relevant sensitive receptors, the assessment will focus either on key individual receptors or on groups considered to be most sensitive to potential effect interactions. Based on the definitions of what negligible effects comprise for each of the technical assessments, these do not warrant further consideration in relation to cumulative effects and therefore will not be pulled through into the assessment of effect interactions. Only residual effects described as minor and above will therefore be considered in the assessment of effect interactions.
- 70 There is no established methodology for assessing the impact of cumulative effects on a particular receptor. The interaction of a combination of individual effects would be determined to be either 'not significant' or 'significant', a scale of the combined effects (minor, moderate or major) would not be applied. If one of the individual effects is significant the combination of effects would be regarded as 'significant'. If none of the individual effects are significant, consideration will be given as to whether or not the combination of many not significant effects could result in a combined significant effect, based on professional opinion. Consideration of effect interactions will be presented within the ES in a separate chapter (**ES Volume 1, Chapter 14: Effect Interactions**).

Determining Effect Significance – Terminology and Approach

Reference to 'Impact' and 'Effect'

- 71 It is noted that the terms 'impact' and 'effect' are distinctly different. Having gained an understanding of the likely impact it is then important to know whether the change in environmental or socio-economic conditions results in a significant environmental effect. The impacts of the Proposed Development may or may not result in significant effects on the environment, depending on the sensitivity of the receptor and potentially other factors (such as duration). The description of the likely significant effects of the development is a requirement identified by Schedule 4 of the EIA Regulations.

Receptor Sensitivity and Magnitude of Impact

- 72 To achieve a consistent approach across the different technical disciplines addressed within the ES (Volume 1 and Volume 2), assessments will broadly define the sensitivity of the receptors that could be affected by the Proposed Development and the magnitude of impact or change from the baseline. Terminology to describe the sensitivity of receptors and magnitude of impact or change from the baseline conditions is broadly as follows:
- High;
 - Medium;
 - Low;
 - Negligible; and
 - No Impact (in relation to magnitude of impact or change only).
- 73 Where there is no impact/change, no assessment will be required due to there being no potential for effects.
- 74 Each of the technical assessment chapters of the ES (Volume 1 and 2) will provide further detail on the definition of each of the above terms specific to the topic in question and will also provide the criteria,

including sources and justifications, for quantifying the different levels of receptor sensitivity and 'impact magnitude'. Where possible, this will be based upon quantitative and accepted criteria (for example, national standards for air quality and noise), together with the use of value judgement and expert interpretation.

Identification of a Resultant Effect

- 75 The basis for determining the resultant effect generally takes into account the sensitivity of the receptor and magnitude of impact or change from the baseline conditions. A generic matrix that combines the sensitivity of the receptor and the magnitude of impact to identify the resultant effect is provided within **Table 2**.

Table 2 Resultant Effects

Receptor Sensitivity	Magnitude of Impact			
	High	Medium	Low	Negligible
High	Major	Major	Moderate	Minor
Medium	Major	Moderate	Minor	Negligible
Low	Moderate	Minor	Negligible	Negligible
Negligible	Minor	Negligible	Negligible	Negligible

Effect Scale

- 76 The categories and definitions of the 'scale' of the resultant effect i.e. definitions of Major, Moderate, Minor and Negligible effects will be adjusted to suit the technical topic in question; where this is the case revised definitions of effect scale will be presented in the technical assessment chapters of the ES Volume 1 and in ES Volume 2.

Where there is no impact to a receptor and therefore no effect, this will be stated.

Effect Nature

- 77 **Table 3** provides definitions of the 'nature' of the resultant effect i.e. definitions of Adverse and Beneficial. Typically, the 'nature' of an effect is defined where the 'scale of the effect' is classified as minor, moderate or major (i.e. the 'nature' is not defined for effects classified as negligible in scale).

Table 3 Definition of the Nature of the Resultant Effect

Type of Effect	Description
Adverse	Detrimental or negative effects to an environmental / socio-economic resource or receptor. The quality of the environment is diminished or harmed.
Neutral	The quality of the environment is preserved or sustained or there is an equal balance of adverse and beneficial effects.
Beneficial	Advantageous or positive effect to an environmental / socio-economic resource or receptor. The quality of the environment is enhanced.

Geographic Extent of Effect

- 78 The ES (Volumes 1 and 2) will identify the geographic extent of the identified effects. At a spatial level, 'site' or 'local' effects are those affecting the site and neighbouring receptors, while effects upon receptors in LBS beyond the vicinity of the site and its neighbours are considered to be at a 'district / borough' level. Effects affecting adjoining boroughs are considered to be at a 'regional' level, whilst those which affect different parts of the country, or England as a whole, are considered being at a 'national' level.

Effect Duration

- 79 For the purposes of the ES, effects that are generated as a result of the demolition and construction works (i.e. those that last for this set period of time) will be classed as ‘temporary’; these may be further classified as either ‘short term’ or ‘medium-term’ effects depending on the duration of the demolition and construction works that generate the effect in question. Effects that result from the completed and operational Proposed Development will be classed as ‘permanent’ or ‘long-term’ effects.

Direct and Indirect Effects

- 80 The ES will identify whether the effect is ‘direct’ (i.e. resulting without any intervening factors) or ‘indirect’ (i.e. not directly caused or resulting from something else).

Effect Significance

- 81 Following identification of an effect, the effect scale, nature, geographic extent and duration using the above summarised terminology, a clear statement will then be made within the ES as to whether the effect is significant or not significant. As a general rule, the following applies:
- ‘Moderate’ or ‘major’ effects are deemed to be ‘significant’.
 - ‘Minor’ effects are ‘not significant’, although they may be a matter of local concern; and
 - ‘Negligible’ effects are ‘not significant’ and not a matter of local concern.
- 82 Where mitigation measures are identified to either eliminate or reduce likely significant adverse effects, these will be incorporated into the ES, for example either through the design, or will be translated into demolition and construction commitments; or operational or managerial standards / procedures.
- 83 The ES will then highlight the ‘residual’ likely significant effects (those effects which remain following the implementation of suitable mitigation measures) and will classify these in accordance with the terminology defined above.

Environmental Topics

- 84 **Table 4** sets out the proposed scope of the EIA. Further detail on each topic is provided in the **Annex C: Topic Sheets** of this EIA Scoping Report. These topic sheets are supported by early technical assessments and baseline work where relevant, and for scoped in topics, the proposed approach and methodology is set out in the relevant topic sheet. For scoped out topics, justification for scoping out is provided.

Table 4 Environmental Topics: EIA Scope

Topic	‘Scoped Into’ the EIA ✓ ‘Scoped Out’ of the EIA ✗		Additional Assessments to Support the Planning Application
	Demolition and Construction	Completed Development	
Air Quality	✓	✓	Air Quality Neutral Assessment and Air Quality Positive Assessment will be covered in ES Chapter 8: Air Quality.
Archaeology (Buried Heritage)	✓	✗	Archaeological Desk Based Assessment (to be appended to the ES)
Climate Change and Greenhouse Gas	✓	✓	
Daylight, Sunlight and Overshadowing	✓	✓	
Ecology and Biodiversity	✗	✗	Preliminary Ecological Appraisal has been appended to this Scoping Report and will be submitted alongside the planning application.

Topic	‘Scoped Into’ the EIA ✓ ‘Scoped Out’ of the EIA ✗		Additional Assessments to Support the Planning Application
	Demolition and Construction	Completed Development	
			Urban Greening Factor, Biodiversity Net Gain Assessment submitted alongside the planning application.
Ground Conditions and Land Contamination	✓	✓	A Phase 1 Land Contamination Assessment has been appended to this Scoping Report, and will be updated if required and submitted in support of the ES Chapter.
Health	✗	✗	Health Impact Assessment will be prepared and submitted as a standalone planning deliverable
Internal Daylight, Sunlight and Overshadowing	✗	✗	The potential for daylight and sunlight availability within the newly proposed residential units and within the newly created public realm is dependent on the design of the Proposed Development, and is a design consideration. Therefore, the assessment of daylight and sunlight availability (including overshadowing) within the Proposed Development itself will not form part of the ES but will be presented as a separate standalone report submitted to accompany of the planning application.
Land Take and Soils	✗	✗	
Light Spillage	✗	✗	
Noise & Vibration	✓	✓	
Project Vulnerability (Major Accidents and Disasters)	✗	✗	
Socio Economics	✓	✓	
Solar Glare	✗	✗	
Townscape, Visual Impact and Heritage	✓	✓	
Traffic and Transport	✓	✓	Transport Assessment will be prepared and submitted as a standalone planning deliverable
Waste and Materials	✗	✗	Operational Waste Strategy to be prepared and submitted as a standalone planning deliverable
Water Resources, Flood Risk and Drainage	✗	✗	Flood Risk Assessment and Drainage Strategy will be prepared and submitted as a standalone planning deliverables
Wind Microclimate	✓	✓	

FORMAT AND CONTENT OF THE EIA

85 The proposed scope and structure of the ES is as follows:

- **ES Volume 1: Main ES** – a document which forms the main body of the ES and which comprises of the following non-technical and technical chapters:
 - Chapter 1: Introduction;
 - Chapter 2: EIA Methodology;
 - Chapter 3: Alternatives and Design Evolution;
 - Chapter 4: The Proposed Development;
 - Chapter 5: Demolition and Construction;
 - 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 and Land Contamination;
 - Chapter 14: Climate Change;
 - Chapter 15: Effect Interactions;
 - Chapter 16: Likely Significant Environmental Effects and Conclusions;
 - Chapter 17: Mitigation and Monitoring Schedule; and
 - Chapter 18: Glossary and Abbreviations.
- **ES Volume 2: Townscape, Visual Impact and Heritage Assessment** – a built heritage assessment and a separate townscape, visual impact and heritage assessment (TVIHA) document that will be accompanied by a full set of views and verified images, and as agreed with LBS as part of this EIA Scoping Process.
- **ES Volume 3: Technical Appendices** – comprises background data, technical reports, tables, figures and surveys.
- **ES Non-Technical Summary (NTS)** - this will be a separate document providing a concise description of the Proposed Development, the alternatives considered, any identified mitigation measures and the residual likely significant environmental and socio-economic effects.

Annex A: Planning Policy Context

Planning Policy Context

The ES, within **ES Volume 1, Chapter 2: EIA Methodology**, will define the relevant national, regional and local policy context. Specifically, the ES will list out the key relevant policy documents but will not discuss the policies within these in any detail.

Although relevant policies out of the key planning policy documents will, in some instances, inform the scope and the methodology of the technical assessments within the EIA, the Proposed Development's compliance with and performance against the relevant planning policies will be appraised within the Planning Statement which will be a standalone document that is submitted in support of the planning application. It is not the purpose of the ES to appraise the Proposed Development against relevant national, regional and local planning policy standards / targets.

Where planning policy informs the scope and the methodology of the technical assessments of the EIA, the policies will be presented in the ES (in the relevant technical topic chapters) and discussed as necessary. Any policy detail required to support the relevant impact assessment scope, methodology or assessment of effects, will either be provided within the technical topic chapter itself or within an appendix to the ES.

National Planning Policy and Guidance

The EIA will be undertaken having regard to the National Planning Policy Framework ('NPPF')²⁰. The NPPF was last updated in July 2021 and sets out the Government's economic, environmental and social planning policies for England. The policies contained within the NPPF articulate the Government's vision of sustainable development, which are intended to be interpreted at a local level, to meet the requirements of local aspirations.

As relevant to the EIA, specifically to the scope, methodology and assessment of effects for the EIA technical topics, the NPPF shall be considered throughout undertaking of the EIA and preparation of the ES.

The EIA will also refer to, as relevant to the EIA technical topics, the National Planning Practice Guidance ('PPG') published in March 2014, which is an online resource. The PPG aims to make planning guidance more accessible, and to ensure that the guidance is kept up to date.

Strategic Planning Policy and Guidance

Key regional policy documents that will be considered throughout the preparation of the ES as relevant include:

- The London Plan – The Spatial Development Strategy for Greater London (March 2021) – hereafter referred to as 'the Adopted London Plan'; and
- Supplementary Planning Guidance (SPG) (i.e. further guidance on policies in the London Plan that cannot be addressed in sufficient detail in the plan itself).

Local Planning Policy and Guidance

As considered relevant to the EIA technical topic scope, methodology or assessment of effects, the ES will have regard to the following key local planning policy and guidance documents:

²⁰ Ministry of Housing, Communities and Local Government, 2021, National Planning Policy Framework. Available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004408/NPPF_JULY_2021.pdf



- Southwark Plan 2022 (the Local Plan)²¹: adopted in February 2022, the Southwark Plan replaces the previous Local Plan (which comprised of the Saved Southwark Plan Policies, the Core Strategy and the Canada Water Area, Peckham and Nunhead Area and Aylesbury Area Action Plans), and provides a new borough wide planning and regeneration strategy up to 2033.
 - The site is allocated within the Southwark Plan (NSP74: Aylesham Centre and Peckham Bus Station) for the provision of a residential-led mixed use development. The Southwark Plan sets out the requirement for the provision of at least 850 new homes, including a mix of private and affordable tenures, and reprovision of at least the existing amount of commercial floorspace currently on the site and of the supermarket use;
- Supplementary Planning Notes and Guidance: the LBS has adopted a number of Supplementary Planning Documents (SPDs) to provide further guidance on policies set out in the Southwark Plan.

Any additional local planning policy and guidance documents considered relevant to the technical assessments which are covered by the EIA will also be considered.

Other Guidance

In addition to any relevant planning policies that inform the scope, methodology or assessment of effects, as relevant, the technical topic chapters of the ES will present a summary of any pertinent recognised industry guidance documents.

²¹ London Borough of Southwark, 2022; The Southwark Plan 2019-2036.



Annex B: Cumulative Schemes

Cumulative Scheme List

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

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

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

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

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

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

Cumulative effects arising from the Proposed Development, in combination with Cumulative Schemes, will be considered throughout the ES. The potential for cumulative effects arising during the demolition and construction works and once the Proposed Development is complete and operational will be considered. Each individual technical chapter of the ES will present an assessment of the cumulative effects of the Proposed Development coming forward alongside the Cumulative Schemes.

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



Table B1 Cumulative Schemes

ID	Site Name	Description	App Ref	Status
Schemes that are Approved and which form part of the Cumulative Assessment				
1	213 Rye Lane London SE15 4TP	Partial demolition of existing buildings and redevelopment to provide buildings ranging from 1 to 7 storeys in height accommodating ground floor commercial space (Class A1/B8) with 40 residential units above (Class C3), raised amenity courtyard together with associated blue badge car parking and cycle parking.	16/AP/0131	Significantly Progressed Approved 28 Mar 2017
2	Aylesbury Estate Phase 1 Land Bounded By Albany Road Portland Street Bagshot Street Alvey Street East Street And Dawes Street London SE17	Outline application for: demolition of existing buildings and phased redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 to 20 storeys in height (12.45m - 68.85m AOD) with capacity for up to 2,745 residential units (Class C3), up to 2,500sqm of employment use (Class B1); up to 500sqm of retail space (Class A1); 3,100 to 4,750sqm of community use; medical centre and early years facility (Class D1); in addition to up to 3,000sqm flexible retail use (Class A1/A3/A4) or workspace use (Class B1); new landscaping; parks, public realm; energy centre; gas pressure reduction station; up to 1,098 car parking spaces; cycle parking; landscaping and associated works. The application is accompanied by an Environmental Statement pursuant to the Town and Country Planning Regulations (Environmental Impact Assessment) 2011.	14/AP/3844	Significantly Progressed Approved 05 Aug 2015
		Minor material amendments to planning permission 14/AP/3843 for Demolition of existing buildings and redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 to 20 storeys in height (9.45m - 72.2m AOD), providing 830 residential dwellings (Class C3); flexible community use, early years facility (Class D1) or gym (Class D2); public and private open space; formation of new accesses and alterations to existing accesses; energy centre; gas pressure reduction station; associated car and cycle parking and associated works. The proposed amendments include: Provision of an additional 12 units (including three townhouses in place of the Gas Pressure Reduction Station); Revisions to unit and tenure mix; Internal reconfiguration and elevational alterations; Minor alterations to landscape layouts, amenity space and roof space.	17/AP/3885	Significantly Progressed Approved 14 Feb 2019
3	Aylesbury Estate Site Phase 2B Land Bounded By Thurlow Street And Albany Road And Kinglake Street And Bagshot Street London Southwark SE17 And SE5	Demolition of the existing buildings and redevelopment to provide a mixed use development comprising five buildings ranging in height from 5 to 26 storeys with basements, providing a total of 614 new homes (Class C3); flexible floorspace for commercial business and service uses (Class E) and local community and learning uses (Class F1/F2(a)(b) public open space and playspace private and communal amenity space formation of new accesses and routes within the site alterations to existing accesses; and associated car and cycle parking; refuse storage and hard and soft landscaping; and associated works. The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Environmental Statement can be viewed online at the planning register. Hard copies of the complete ES can be purchased from HGH for a fee or an electronic version can be sent free of charge in PDF format, upon request.	22/AP/2226	Approved 17 Jan 2023



ID	Site Name	Description	App Ref	Status
4	Malt Street Regeneration Site Land Bounded By Bianca Road Latona Road Haymerle Road Frensham Street And Malt Street London SE1	Hybrid application comprising a full planning application for Phase 1 (the 'Detailed Component') and outline planning permission (the 'Outline Component') for Phases 2 & 3: Detailed Component (Phase 1): Full planning permission for the demolition of existing buildings and structures and redevelopment of the central area for the erection of a total of 4 buildings, two at 7 storeys (Buildings B9& part B12), one at 15 storeys (Building B10), and one at 44 storeys (Building B4) (max height 147.12m AOD) to provide 420 homes, 1,197 sqm GEA of Class B1(c) floorspace and 785 sqm GEA of non-residential floor space within classes A1-A4 (retail), Class B1 (business) and Class D1 (public services) and D2 (entertainment and leisure) use, an energy centre (750 sqm) and new public open space and public realm with on street and basement car parking spaces and cycle spaces. Outline Component (Phase 2 & 3): Outline planning permission (scale, layout, landscaping, access and appearance reserved) for the demolition of existing buildings and structures and the erection of eight buildings (B1, B2, B3, B5, B6, B7, B11 and part B12) ranging in height from 5 to 35 storeys (max height 132.9m AOD) to provide up to 88,052sqm floorspace GEA, comprising up to 880 residential units, up to 3,316 sqm GEA of Class B1(c) floorspace and up to 1,702sqm GEA of non-residential floor space within Classes A1-A4 (retail), Class B1 (business), Class D1 (public services) and D2 (entertainment and leisure) use and car parking spaces at ground level and cycle spaces, with associated new open space, public realm, car parking and associated works. Totals: Up to 1,300 homes and up to 7,000sqm commercial floorspace.	17/AP/2773	Commenced Approved 30 Oct 2020
		Application for Reserved Matters (scale, layout, landscaping, access and appearance) relating to Blocks B1, B2, B3 and B11 and all associated landscaping, car parking and ancillary works on land bounded by Glengall Road, Ossory Road, Bianca Road, Haymerle Road and Latona Road, London, SE1 and pursuant to Hybrid permission 17/AP/2773. The proposals comprise the construction of 4 buildings ranging from 5 to 24 storeys in height (26.7m to 83.45m AOD), for 269 residential units, 4,128 sqm GEA of non-residential floorspace for retail, workspace and leisure (Use Classes A1-A4, B1c, D1 and D2), landscaping, new public realm, basement comprising parking and plant areas.	20/AP/3242	Commenced Approved 18 Feb 2021
5	Land At Cantium Retail Park 520 Old Kent Road London SE1 5BA	Demolition of existing buildings and redevelopment of the site to provide a new basement level and buildings ranging from 3 to 48 storeys in height (max height 159.05m above ground level) comprising up to 1,113 residential units (Class C3), up to 5,659 sq. m of office floorspace (Class B1(a)), up to 2,228 sq. m of retail floorspace (Class A1), up to 2,336 sq. m of flexible space including use within Classes A1, A3, D1, D2 and / or Sui Generis (Theatre) within Block B and up to 596 sq. m of flexible space within Classes A1, A2 and / or A3 within Block C together with associated access, car parking, landscaping and infrastructure works. The application is accompanied by an Environmental Statement which can be purchased from Ramboll (london@ramboll.co.uk) at a cost of £10 per copy for a CD and £698+VAT for a hard copy.	18/AP/3246	Approved 12 Feb 2021
6	840 Old Kent Road London SE15 1NQ	Demolition of existing building and redevelopment of the site to provide a new building of up to 13 and 21 storeys in height (maximum height 73.60m above ground level). Redevelopment to comprise 170 residential units (Class C3), a 1,778 sqm (GIA) retail unit (Class A1) and a 52 sqm (GIA) flexible retail unit (Class A1/A3), with associated landscaping, car parking, servicing, refuse and plant areas, and all ancillary or associated works.	19/AP/1322	Significantly Progressed Approved 20 Nov 2019
7	Land At 313-349 Ilderton Road London SE15	Demolition of existing buildings and construction of two buildings, one of part 11 and 13 storeys and one of part 13 and 15 storeys, to provide 1,526sq.m (GIA) of commercial floorspace (Use Class B1c), 250 student accommodation bed spaces (Sui Generis) and 58 residential units (Use Class C3), with associated access and highway works, amenity space, cycle parking spaces, disabled car parking spaces and refuse/ recycling stores.	20/AP/1329	Significantly Progressed Approved 13 May 2021
8	Land Bounded By Ruby Street Murdock Street And 685-695 Old Kent Road London SE15 1JS	Demolition of existing buildings and erection of and construction of a part 3, part 7, part 22 storey building (76.6m) from ground level with roof top level amenity space, comprising 111 dwellings, 1,151 sqm (GIA) of D1 floorspace for a church with ancillary communal facilities, 2,173 sqm (GIA) of workspace (B1a and B1c) Use Class) and 87 sqm (GIA) of A1/A2/B1 floorspace, with associated landscaping, car and cycle parking, servicing and refuse and recycling facilities. (This application represents a departure from strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and	18/AP/0196	Commenced Approved 22 Dec 2020



ID	Site Name	Description	App Ref	Status
		saved policy 1.2 'strategic and local preferred industrial locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location).		
9	651-657 Old Kent Road London SE15 1JU	Demolition of existing buildings on the site and the comprehensive mixed-use redevelopment of the site comprising of two buildings of 10-storeys plus mezzanine (up to 38.900m AOD) and 19-storeys plus mezzanine (up to 71.500m AOD), comprising 262 residential units (Use Class C3 use), 2,320sqm GEA of flexible retail and commercial floorspace (Class A1/A2/A3/A4/B1 uses) at ground and mezzanine level, new public park, private and communal amenity space, associated car and cycle parking, access and servicing arrangements, plant and other associated works.	19/AP/1710	Commenced Approved 06 Dec 2021
10	Ruby Triangle Site Land Bounded By Old Kent Road Ruby Street And Sandgate Street London SE15 1LG	Full planning permission is sought for demolition of existing buildings and structures on the site, and redevelopment consisting of three buildings at maximum heights of 17 storeys (including mezzanine) (+64.735m AOD), 48 Storeys (+170.830m AOD) and 40 storeys (including mezzanine) (+144.750m AOD), plus single storey basement under part of the site. Development would provide 1,152 residential dwellings (Class C3), retail, business and community spaces (Classes A1, A2, A3, A4, B1(a),(b),(c) and D1), public sports hall and gym (Class D2), public and private open space, formation of new accesses and alterations to existing accesses, energy centre, associated car and cycle parking and other associated works. (REVISED DESCRIPTION) This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location. THE APPLICATION IS ACCOMPANIED BY AN ENVIRONMENTAL STATEMENT submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) regulations 2017. The ES can be viewed on the Council's website. Copies of the ES may be obtained from rubytriangle@glhearn.com at a charge of £20 for CD copy of the full ES, £150 for a hard copy of the ES Main Report (Volume 1), £100 for a hard copy of the ES Drawings and Appendices (Volume 2). There would be no charge for an emailed copy or single hard copy of the Non Technical Summary (Volume 3).	18/AP/0897	Commenced Approved 06 Jun 2019
11	6-12 Verney Road London SE16 3DH	Redevelopment of the site for a mixed use development comprising three buildings (Building 1: basement, ground, ground mezzanine plus 17 storeys (AOD 66.975m); Building 2: basement, ground, ground mezzanine plus 22 storeys (AOD 81.975m); Building 3: basement, ground, ground mezzanine plus 16 storeys (AOD 62.675m) to accommodate 338 residential unit, 5,234 Sqm GEA of commercial floor space (Class B1(c)), associated cycle and car parking, servicing, refuse and recycling, landscaping including contribution towards the new Surrey Canal linear park, and private and communal residential amenity space and children's playspace. (This application represents a departure from strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and saved policy 1.2 'strategic and local preferred industrial locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location).	17/AP/4508	Approved 10 Feb 2022
12	227-255 Ilderton Road London SE15 1NS	Demolition of existing buildings and the erection of a part 2/3, 9 and 28 storey (up to 94.65m AOD) mixed-use development comprising of 3,581 sqm including 2,538 sqm of industrial floorspace (Use Classes B1c/B8) at ground and intermediate levels, 598 sqm of internal loading yard, 445 sqm ancillary plant and equipment; and 253 residential apartments (C3), 35.75% affordable by habitable room, and other associated infrastructure. This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location.	19/AP/1773	Significantly Progressed Approved 29 Jan 2021
13	747-759 & 765-775 Old Kent Road London SE15 1NZ & Land At Devonshire Grove SE15 1NZ	Hybrid application consisting of: (Detailed Proposals) Demolition of all existing structures on site, the stopping up of the existing Devonshire Grove major arm (IWMF egress road) and redevelopment to include formation of a new road reconfiguration and widening of Devonshire Grove, widening of the foot ways on Sylvan Grove and Old Kent Road, construction of Building A at ground plus 38 storeys to provide 264 residential units (Class C3), flexible retail/employment floorspace (Class A1/A2/A3/A4/B1a-c), creation of a new public	19/AP/1239	Approved 17 Feb 2022



ID	Site Name	Description	App Ref	Status
		realm including new public squares and spaces ,associated landscaping and highways works and a new substation and all associated works. (Outline Proposals) Outline planning permission (all matters reserved) for comprehensive mixed-use development for the following uses in four Buildings (B, C, D and E) and a basement level shared with Building A: Up to a maximum of 301 residential units (Class C3); employment workspace floorspace (Class B1a-c); flexible retail, financial and professional services, food and drink uses (Class A1/A2/A3/A4/A5), flexible non-residential institutions (Class D1) and Assembly and leisure uses (Class D2); Storage, car and cycle parking; Energy centre; Substations; Formation of new pedestrian and vehicular access and means of access and circulation within the site together; and new private and communal open space. This Application is for a Phased Development for CIL purposes with details of the phasing to be secured by Condition.		
14	747-759 & 765-775 Old Kent Road And Land At Devonshire Grove London SE15 1NZ	Phased mixed-use redevelopment of the site, comprising: - Demolition of all existing buildings/structures, site clearance and excavation; - Construction of buildings to provide residential dwellings (Class C3) and flexible commercial, business and service space (Class E); - Construction of buildings to provide purpose built student accommodation including associated amenity and ancillary space, flexible commercial, business, service and community spaces within Classes E/F2(b) (Sui Generis); and - Provision of associated car and cycle parking, open space and landscaping, means of access and highway alterations, installation of plant and utilities and all other associated ancillary works incidental to the development.	23/AP/1862	Under Consideration Validated 03 July 2023
15	Open Land Rear Of 1-51 Peckham High Street Bounded By Sumner Avenue And Melon Road Open Land Adjacent To 59 Peckham High Street And Sumner House Located On Sumner Road London	Redevelopment of the site to provide four buildings to deliver 168 residential dwellings (Class C3) and flexible retail floor space (247m2) of flexible A1/A3/A4: The works include the conversion and extension of Sumner House (Block A) from office use (Class B1-c) to provide 44 no flats and 4 no townhouses and partial demolition of a boundary wall; the erection of a part 4, part 6 storey block to provide 39 no flats on Sumner Avenue (Block B); a part four, part 6 storey building to provide 72 no. flats on Jocelyn Street (Block C); and a four storey block providing 9 flats on Melon Road (Block D), with 247m2 of flexible A1/A3/A4 use at ground floor level, together with car parking, hard and soft landscaping, and other associated works incidental to the development.	16/AP/4018	Significantly Progressed Approved 15 Nov 2019
16	Vacant Site Opposite Central Venture Park Commercial Way SE15 (On The Site Of Former 25 Commercial Way),	Redevelopment of existing site to provide a residential development comprising the erection of two x 9-storey buildings and 2 x 5 storey buildings on either side of re-aligned Cronin Street, providing 109 residential dwellings (100% Affordable) , 10 no. car parking space together with access, hard and soft landscaping and other associated works incidental to the development	16/AP/4702	Significantly Progressed Approved 21 May 2018
17	Ledbury Estate Commercial Way London Southwark	Redevelopment of the Ledbury Estate involving the demolition of Bromyard House, Skenfirth House, Sarnsfield House and Peterchurch House and the erection of 6 blocks ranging in height from 5 to 22 storeys to provide 340 new homes (including 224 replacement homes) and some non-residential space at ground level, together with access, servicing, car parking, cycle parking, cycle storage, plant, play and open space and landscaping.	22/AP/0554	Approved 15 Dec 2022
18	Southernwood Retail Park 2 Humphrey Street London SE1 5JJ	Hybrid Application: - Full planning permission for 'Phase 1' comprising demolition of existing buildings and the erection of a part 9, part 14, part 16, part 48 storey development (plus basement) up to 161.25m AOD, with 844 sqm GIA of (Class A1) retail use, 477 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use, 8671 sqm GIA (Class C1) hotel; 542 (class C3) residential units (51,499 sqm GIA); landscaping, public realm and highway works, car	18/AP/3551	Approved 20 Jan 2022



ID	Site Name	Description	App Ref	Status
		and cycle parking and servicing area, plant and associated works. - Outline planning permission (with details of internal layouts and external appearance reserved) for 'Phase 2' comprising demolition of existing buildings and the erection of a part 9, part 12, storey development (plus basement) up to 42.80m AOD, with 1049 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use; 183 (Class C3) residential units (17,847 sqm GIA), 856 sqm GIA (Class D2) cinema and the creation of a 461 sqm GIA (Class C1) hotel service area at basement level; landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works		
19	Dulwich Hamlet Football Ground	Redevelopment of the Dulwich Hamlet Football (Champion Hill) Stadium, including the demolition of existing buildings, and use of land at Greendale, to provide: - the erection of a new stadium with relocated playing pitch with associated floodlighting and boundary treatment, and part two-part three storey clubhouse building with sports and leisure facilities, with capacity for 4,000 spectators (Use Class D2); - the construction of a multi-functional kickabout space and associated boundary treatment; - the erection of a series of buildings between four and six storeys in height to provide 219 residential dwellings, (Use Class C3); - associated car parking, cycle parking, refuse storage and access road; - the widening and greening of a public route with associated hard and soft landscaping; - the relocation of telecommunications equipment and re-provision of the substation together with plant and equipment.	19/AP/1867	Approved 21 Feb 2022
20	40-46 Solomons Passage	Demolition of all buildings on the site and construction of a development of 91 residential units within four buildings (a 7-storey Block A building, a 6-storey Block B/C building and two buildings in Block D of 2- and 4-storeys), together with alterations to the retained basement, provision of car and cycle parking and landscaping.	20/AP/3285	Approved 20 April 2022
21	25-33 Parkhouse Street	The redevelopment of the site to provide a mixed-use development comprising buildings up to 11 storeys in height and accommodating new homes (Use Class C3) and commercial floorspace (Use Class B1c), car parking, cycle parking and associated landscaping	20/AP/0858	Commenced Approved 27 May 2022
22	Bells Gardens Community Centre	Construction of 97 homes, alongside the provision of the existing community facilities on the site as well as new landscaped areas	21/AP/1077	Approved 29 Jan 2022
Submitted & Pending Determination				
23	812 Old Kent Road London SE15 1NH	Demolition of existing building and construction of new part 6, part 7, part 12, part 19 storey building plus basement to provide 154 residential units (Use Class C3) and 1,950 sq.m of commercial floorspace (Use Class B1). The provision of public and private open space, landscaping, car and cycle parking a service area and other associated works.	19/AP/0994	Validated 31 May 2019 Pending Decision
24	Ilderton Wharf 1-7 Rollins Street London Southwark SE15 1EP	Demolition of existing buildings and erection of a mixed use development comprising a building of part 9, 23 and 25 storeys above ground to provide a replacement builders merchants with associated office, trade counter sales area , showroom and external storage/racking, a commercial unit fronting Ilderton Road (Use Class E) 170 residential apartments (Use Class C3) and other associated infrastructure.	21/AP/4757	Resolution to Grant 18 Oct 2022 Pending Decision



ID	Site Name	Description	App Ref	Status
25	Land A at Surrey Canal Road, Stockholm Road, Bolina Road And, Rollins Street, London, SE16	Hybrid planning application for the redevelopment of land at Surrey Canal Road, Stockholm Road, Bolina Road and Rollins Street, London SE15 and SE16 comprising: FULL planning application for Phase 1 comprising the demolition of existing buildings at Orion Business Centre and construction of residential dwellings together with auditorium, meeting rooms, offices, and restaurant/ café floorspace (Sui Generis and Class E) within a podium, with associated vehicular and cycle parking, public realm, amenity space, landscaping and infrastructure; and OUTLINE planning application for demolition of existing buildings (with the exception of Guild House and part of Rollins House which are to be retained) and construction of up to 400,000sqm of floorspace, comprising residential floorspace (Class C3), business floorspace, leisure floorspace, retail, food and drink floorspace and non-residential institution floorspace (Class E), learning and non-residential institutions (Class F1), pubs and takeaways (Sui Generis) together with associated basements, vehicular and cycle parking, public realm, amenity space, landscaping, highway works and infrastructure (scale, layout, landscaping, access and appearance reserved).	DC/20/119706 LB Lewisham	Resolution to Grant 27 Jan 2022 Pending Decision



Annex C: Topic Sheets

TOPIC SHEET

AIR QUALITY

Introduction

It is considered that there is the potential for likely significant effects relating to air quality and so this topic shall be **SCOPED IN** to the EIA. The air quality assessment will be carried out by Air Quality Consultants Ltd.

The ES air quality assessment shall:

- Define the air quality baseline conditions;
- Identify relevant air quality receptors;
- Assess:
 - a. the potential for air quality impacts throughout the demolition and construction works, and as a result of the completed development and resultant air quality effects;
 - b. the impacts of existing sources of pollution on future residents and users of the completed development itself;
 - c. the likely significance of any air quality effects;
 - d. any required mitigation to:
 - i. avoid significant adverse air quality effects; and
 - ii. minimise and reduce any other adverse air quality effects.
 - e. the potential for cumulative air quality effects.

Baseline Conditions

Current Baseline Conditions

- 1 The site is located approximately 20m to the south of Peckham High Street (A202) and adjacent to the Peckham Bus Station, in Southwark. The site currently comprises the Aylesham Shopping Centre, housing a number of commercial and retail properties, a surface car park and a Morrisons petrol station. It is bounded by commercial and residential properties and the Peckham Bus Station to the north, Rye Lane to the west, Hanover Park to the south and residential properties and Mckerrell Road to the east.
- 2 The London Borough of Southwark (LBS) has declared an Air Quality Management Area (AQMA), encompassing the entire northern part of the borough for exceedances of the annual mean nitrogen dioxide (NO₂) and 24-hour particulate matter (PM₁₀) objectives; the site is located within this area. The site is also located within the 'Peckham Town Centre' Air Quality Focus Area. Focus Areas are areas that have been identified by the Greater London Authority (GLA) as locations that not only exceed the annual mean limit value for NO₂ (40 µg/m³) but are also locations with high levels of human exposure. They are areas where the GLA considers there to be the greatest potential for air quality improvements and are, therefore, where actions will be focused, by the GLA and Transport for London (TfL), to improve air quality.
- 3 LBS operates four automatic monitoring stations within its area, the closest of which is roadside monitor 'SWK 5' located approximately 940 m to the northeast of the Proposed Development. The LBS also operates a number of NO₂ monitoring sites closer to the site using diffusion tubes, including five monitoring sites within 900 m of

the Proposed Development. The latest monitoring data are shown in 3 and the monitoring locations are displayed in 0.

Table 1 Summary of LBS NO₂ Monitoring (µg/m³) (2016-2022)^{1 a}

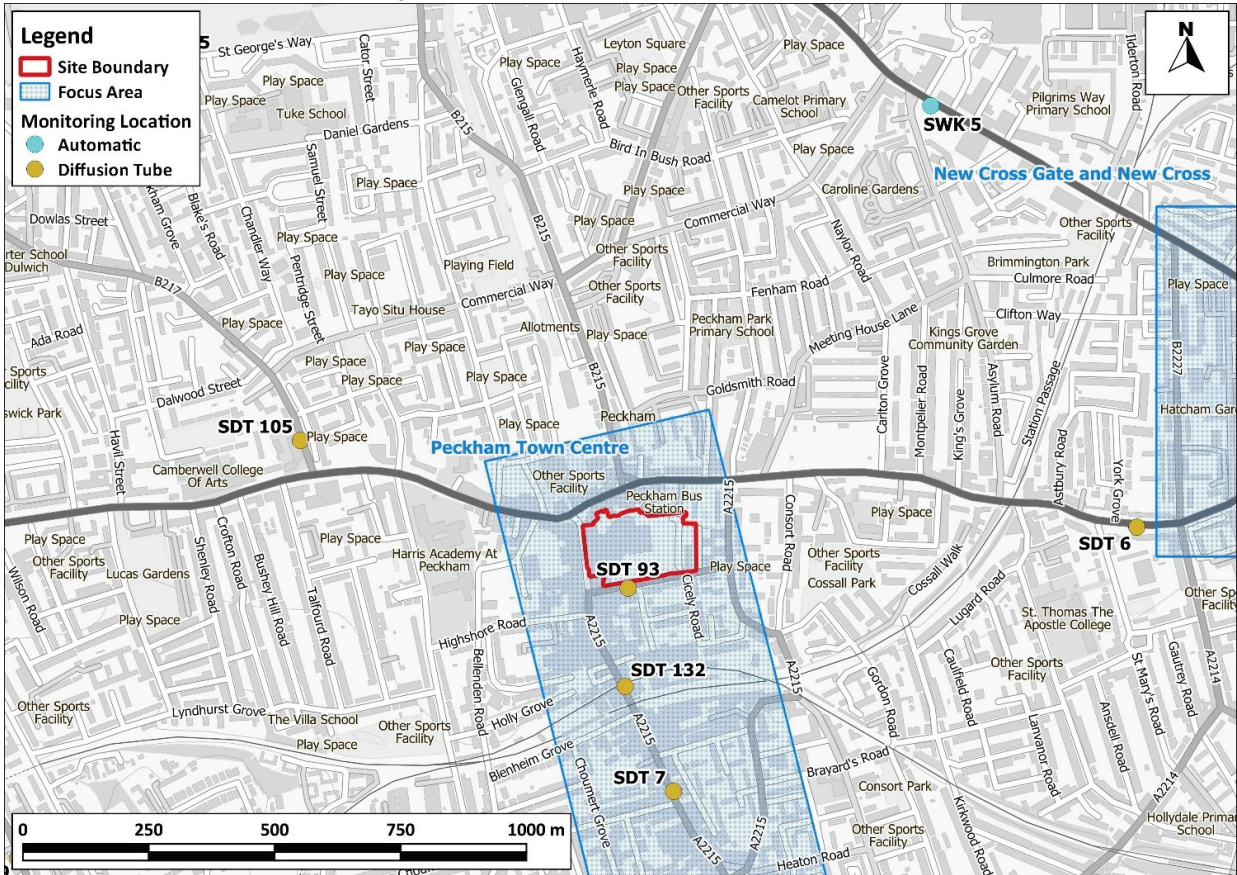
Site ID	Site Type	Location	2016	2017	2018	2019	2020	2021	2022
Annual Mean									
SWK5	Automatic – Roadside	Old Kent Road	53.0	42.0	41.0	35.0	25.0	29.0	26.0
SDT 6	Diffusion Tube – Kerbside	Adjacent to 168 Queens Road	45.1	63.1	38.0	36.1	35.0	28.4	35.1
SDT 7	Diffusion Tube – Kerbside	Adjacent to 167A Rye Lane	45.9	46.4	34.9	31.6	20.7	21.0	26.8
SDT 93	Diffusion Tube – Roadside	Lamppost 9 adjacent to 14 Hanover Park	-	58.4	53.3	37.8	30.7	33.1	36.4
SDT 105	Diffusion Tube – Kerbside	Lamppost adjacent to Oliver Goldsmith School entrance Southampton Way	-	44.2	39.8	35.6	24.7	29.9	27.3
SDT 132	Diffusion Tube – Kerbside	Lamppost 2732/01 adjacent to 117-125 Rye Lane	-	-	-	33.0	21.5	23.9	28.6
Objective			40						
Number of Hourly Mean Concentrations > 200 µg/m ³									
SWK5	Automatic – Roadside	Old Kent Road	1	0	0	0	0	0	0
Objective			18						

^a Exceedances are shown in **bold**. Exceedances of 60 µg/m³, indicating a potential exceedance of the 1-hour mean objective, are shown in **bold and underlined**.

- 4
- As shown in 3, no exceedances of the annual mean nitrogen dioxide objectives have been observed at any of the monitoring sites since 2019. However, historically concentrations above the objective have been measured at the following sites; ‘SWK 5’ automatic station between 2016 and 2018, ‘SDT 6’ and ‘SDT 7’ in 2016 and 2017, ‘SDT 93’ in 2017 to 2019 and ‘SDT 105’ in 2017. A concentration of more than 60 µg/m³ was measured at site ‘SDT 6’ in 2017, indicating a potential exceedance of the 1-hour mean objective. Neither the annual nor the 1-hour mean nitrogen dioxide objective was exceeded at the automatic monitor ‘SWK 5’ in 2022.
- 5
- While 2020 and 2021 results have been presented for completeness, they will not be relied upon in any way as they are not representative of ‘typical’ air quality conditions due to the impact of the COVID-19 pandemic on traffic volumes and thus pollutant concentrations. Therefore, concentrations measured in 2019 will be used within the air quality ES Chapter.
- 6
- LBS also measures PM₁₀ concentrations at the automatic monitoring station ‘SWK 5’ and Table 2 shows the latest monitoring data. This monitor also started measuring concentrations of PM_{2.5} in 2020, however, due to the impact of the COVID-19 pandemic, the measured concentrations should be treated with caution.

¹ London Borough of Southwark (2021) Southwark Air Quality Annual Status Report 2020

Figure 1. Approximate Site Boundary, Nearby Monitoring Locations (LBS Automatic and Diffusion Tubes) and Air Quality Focus Area



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Table 2 Summary of LBS PM₁₀ and PM_{2.5} Monitoring (µg/m³) (2016-2022)^{1 a}

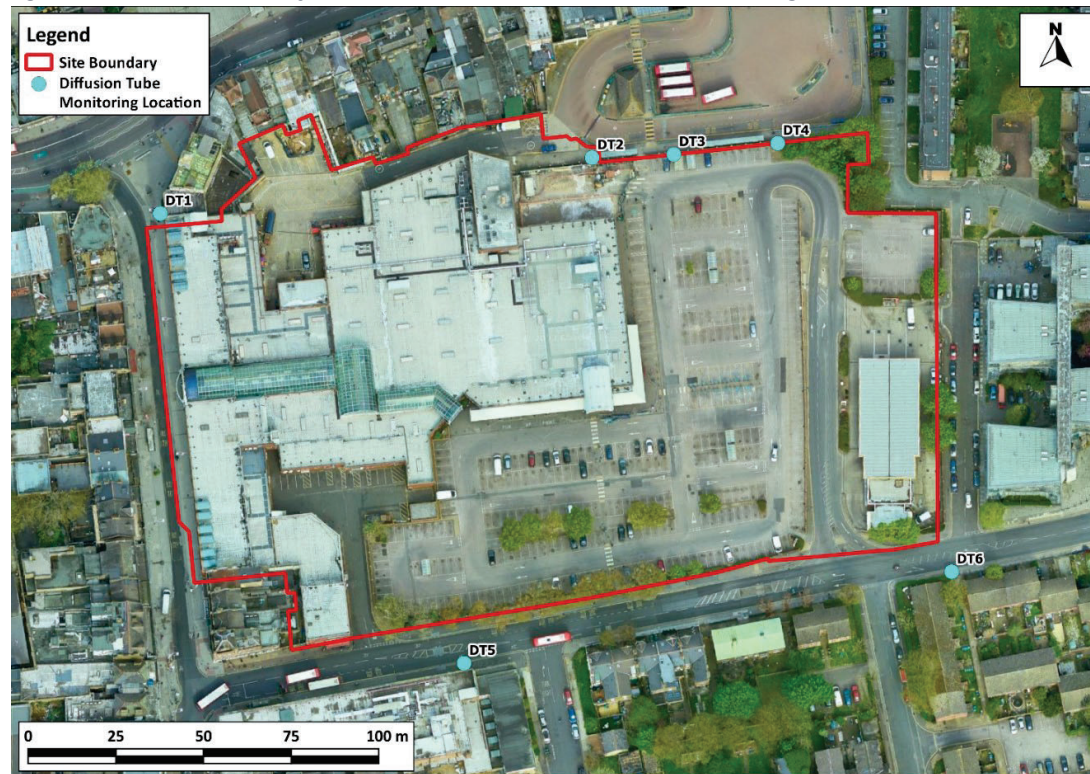
Site ID	Site Type	Location	2016	2017	2018	2019	2020	2021	2022
Annual Mean PM ₁₀ (µg/m ³)									
SWK5	Automatic – Roadside	Old Kent Road	24	22	22	24	22	21	21
Objective			40						
Annual Mean PM _{2.5} (µg/m ³)									
SWK5	Automatic – Roadside	Old Kent Road	-	-	-	-	10	9	-
Objective / GLA Target			25 / 10						
No. of Days PM ₁₀ > 50 µg/m ³									
SWK5	Automatic – Roadside	Old Kent Road	18	19	8	2	11	8	7
Objective			18						

^a Exceedances are shown in **bold**.

- 7
- As shown in Table 2, the measured annual mean PM₁₀ concentrations were below the objective in all years presented. The 24-hour mean concentrations exceeded the objective in 2017 but remained below the objective in all other years.
- 8
- A site-specific diffusion tube monitoring survey has been undertaken, to measure nitrogen dioxide concentrations in the vicinity of Peckham Bus Station, to the north of the site. The three-month survey incorporated measurements at six locations, which were agreed with Southwark Council and are shown in Figure 2. One site will be co-located with the Southwark Council diffusion tube monitoring site on Hanover Place, to

ensure consistency between the different sets of measurements. Monitoring was carried out between 22nd August 2022 and 30th November 2022. The results have been annualised and will be used in the model verification process, alongside monitoring carried out by Southwark Council, and will inform the assessment and the likely air quality conditions experienced by future residents and users of the Proposed Development.

Figure 2. Site Boundary and Potential Diffusion Tube Monitoring Locations



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- 9 A description of the diffusion tube locations is provided in Table 3 and the fully adjusted 2022 annual mean equivalent nitrogen dioxide concentrations are shown in Table 4

Table 3 Description of Diffusion Tube Monitoring Locations

Site ID	Location	Distance from Kerb	Height ^a
DT1	Pipe on the corner of The Aylesham Centre east of Rye Lane	5.0 m	2.7 m
DT2	Camera pole adjacent Peckham Bus Station (Stop H)	3.5 m	2.7 m
DT3	Lamppost west of Peckham Bus Station (Stop E)	4.5 m	3.2 m
DT4	No entry sign east of Conduit Road	4.5 m	3.0 m
DT5	Lamppost at 14 Hanover Park	0.5 m	2.3 m
DT6	20 mph sign at 44 Hanover Park	0.5 m	2.9 m

^a Each tube was installed at its respective location, at a height where air flow would not be disturbed or blocked by any existing signage or street-furniture. In addition, tube 'DT5' was installed at the same height as the LBS's tube (SDT93).

Table 4 Diffusion Tube Monitoring Results – 2022 Annual Mean Equivalent ^{a, b}

Site ID	Location	Distance from Kerb
DT1	Pipe on the corner of The Aylesham Centre east of Rye Lane	29.6
DT2	Camera pole adjacent Peckham Bus Station (Stop H)	30.5
DT3	Lamppost west of Peckham Bus Station (Stop E)	33.3
DT4	No entry sign east of Conduit Road	33.8
DT5	Lamppost at 14 Hanover Park	43.8
DT6	20 mph sign at 44 Hanover Park	40.2

^a The diffusion tube monitoring sites have been bias-adjusted, using the national bias-adjustment factor for 2021 $(0.84)^2$ for the relevant diffusion tube type from Defra's national adjustment spreadsheet (v09/22).

^b Data capture was 100% at all diffusion tube sites, for the duration of the monitoring survey.

- 10 As shown in **Error! Reference source not found.**, exceedances of the annual mean nitrogen dioxide objective were measured at the 'DT5' and 'DT6' monitoring sites, and at all other locations concentrations were below the objective. Both sites where exceedances were measured are located within 0.5 m of the kerbside of the busy Hanover Park, and as such concentrations are expected to be higher, compared to the other four locations.
- 11 As mentioned in Paragraph **Error! Reference source not found.**, diffusion tube monitoring site 'DT5' was co-located with LBS's diffusion tube 'SDT93'. In 2022, 'SDT93' measured a concentration of $36.4 \mu\text{g}/\text{m}^3$, compared to site 'DT5' which measured a concentration of $43.8 \mu\text{g}/\text{m}^3$. The 'DT5' measured concentration is considerably higher than that at the 'SDT93' monitoring site; however, it should be noted that 'DT5' has a data capture of just three months, from August to November 2022, which represents only a small portion of the year, and there is uncertainty in the results associated with the annualisation process. The 'SDT93' monitoring site, in contrast, has had a full year of data capture for 2022, according to LBS's 2022 ASR, and thus it is a much more reliable source, on which the assessment will rely.
- 12 Diffusion tube monitoring sites 'DT2', 'DT3' and 'DT4' are all located within 4.5 m of Peckham Bus Station; concentrations at these sites were all below the air quality objective. Even though the monitoring period is only 3-months, it is useful to demonstrate that concentrations at the boundary with the bus station are lower than those adjacent to Hanover Park.

Future Baseline Conditions

- 13 Future air quality conditions within the study area will be determined using detailed dispersion modelling, following the methodology described in the *Assessment of Effects* section.

Receptors

Demolition and Construction

- 14 For the on-site demolition and construction activities, the assessment will consider the potential for impacts within 350m of the site boundary, and within 50m of the routes to be used by construction vehicles up to 500m from the site exit(s). For the construction dust assessment, relevant receptors (including introduced sensitive receptors, taking account of the phasing of the Proposed Development) in the area will be considered. Relevant receptors in the area include residential dwellings and educational facilities (high sensitivity receptors) as well as offices and shops (medium sensitivity receptors). Receptors will be identified based upon the distance

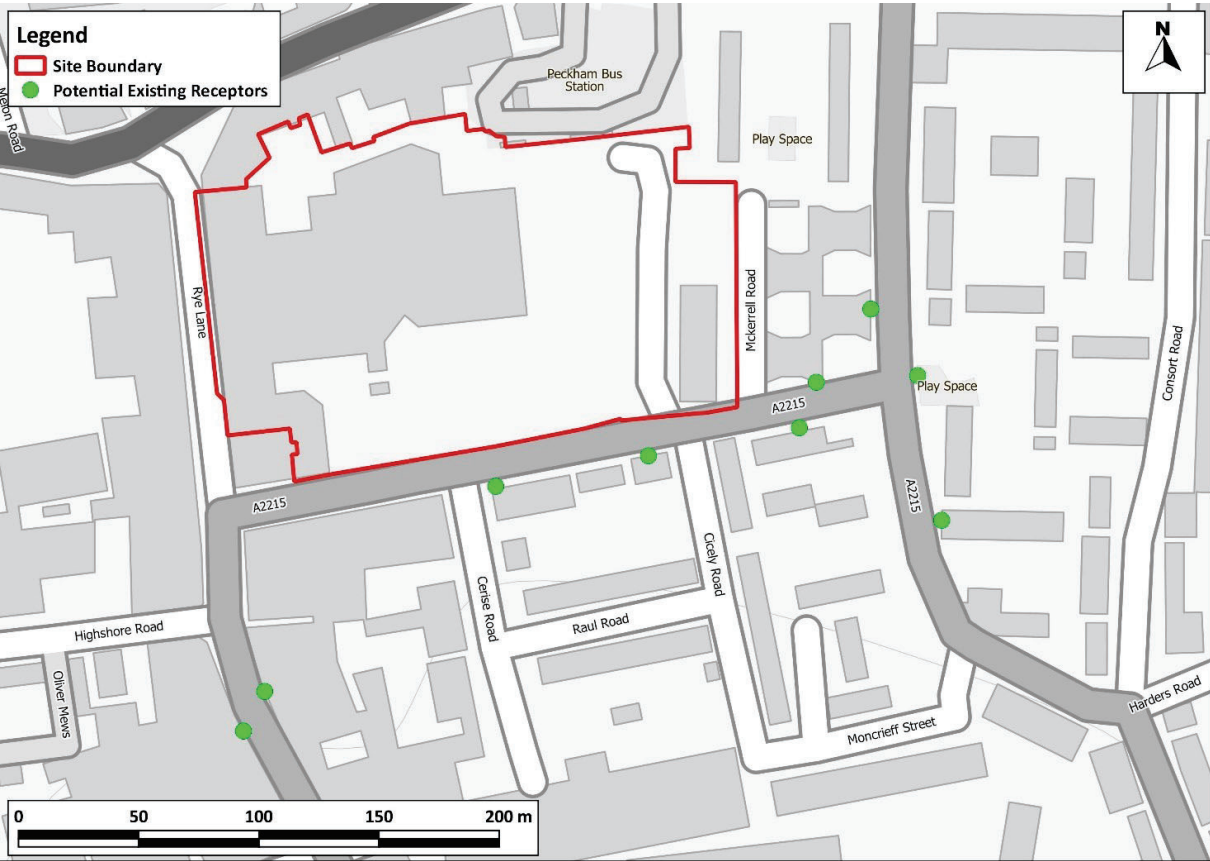
² The 2022 factor was not available at the time of the analysis; however, it is also the same as for 2021.

bandings set out in the IAQM guidance. This is the approach recommended in the GLA’s guidance on The Control of Dust and Emissions during Construction and Demolition³.

Completed Development

- 15
- For the assessment of operational effects, suitable existing and introduced receptor locations will be identified based on detailed maps, satellite imagery, and plans of the Proposed Development. Receptors will be identified to represent a range of exposure, including worst-case locations. Future receptor locations within the Proposed Development will also be considered. The objectives apply at locations where members of the public are likely to be regularly present and are likely to be exposed over the averaging period of the objective (i.e., locations with relevant exposure). Consideration will be given to those locations with relevant exposure to the annual mean objectives (i.e., residential areas, including outdoor amenity spaces) and the 1-hour mean nitrogen dioxide objective (i.e., retail areas and public realm spaces).
- 16
- All receptors where the air quality objectives apply will be considered to be ‘high’ sensitivity receptors and will be taken into account as part of the assessment. 0 identifies likely existing receptors. These are indicative locations only, and final receptor locations will be determined when undertaking the assessment, based on available traffic data and plans of the Proposed Development. Receptors within the Proposed Development will be located on the building facades closest to the sources of pollution (roads and energy plant) and in outdoor amenity spaces.

Figure 3. Potential Receptor Locations (Approximate Site Location)



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Assessment of Effects

- 17
- Potential air quality effects that will be considered in relation to the construction and operation of the Proposed Development include:

³ GLA (2014) The Control of Dust and Emissions from Construction and Demolition Supplementary Planning Guidance

- Impacts of dust soiling and particulate matter (PM₁₀) emissions during the demolition and construction of the Proposed Development on existing sensitive receptors in the local area (taking account of the phasing of the Proposed Development);
 - Impacts of NO₂ and particulate matter (PM₁₀ and PM_{2.5}) emissions from vehicles associated with the demolition and construction of the Proposed Development at existing sensitive receptors in the local area;
 - Impacts of NO₂, PM₁₀ and PM_{2.5} emissions from road traffic generated by the Proposed Development once operational at existing sensitive receptors in the local area;
 - Impacts of NO₂ emissions from any energy plant included in the Proposed Development (such as emergency generators) once operational at existing sensitive receptors in the local area;
 - Impacts of existing sources of pollution, from both traffic using the local road network and energy plant within the Proposed Development on the Proposed Development itself; and
 - The potential for the Proposed Development and cumulative schemes to cumulatively impact air quality at sensitive receptors (existing and proposed) during the demolition, construction and operation of the Proposed Development.
- 18
- A preliminary air quality assessment has been undertaken prior to preparation of the Environmental Statement to identify any design opportunities that will avoid or reduce the air quality effects associated with the Proposed Development, and to identify any air quality constraints. It concluded that the air quality objectives are anticipated to be met at the building façades of the Proposed Development, with a slight risk of the annual mean nitrogen dioxide objective being exceeded within 1-2 m of Hanover Park. Long-term monitoring ('SDT93') published after the preliminary air quality assessment was prepared has, however, measured an annual mean nitrogen dioxide concentration below the objective in that location.
- 19
- The air quality neutrality of the Proposed Development, as well as measures aimed at ensuring the Proposed Development is Air Quality Positive, will also be addressed in accordance with the requirements of the London Plan.

Policy and Legislation

- 20
- The air quality assessment will be conducted in accordance with the principles set out in the following policies and guidance:
- The Clean Air Act 1993 & Environmental Protection Act;
 - The National Planning Policy Framework and associated Planning Practice Guidance;
 - The London Plan;
 - London Plan Guidance – Air Quality Neutral;
 - London Plan Guidance – Air Quality Positive;
 - The GLA’s SPG on the Control of Dust and Emissions During Construction and Demolition;
 - The Southwark Plan 2022; and
 - The Environment Protection UK (EPUK) and Institute of Air Quality Management (IAQM) ‘Land-Use Planning & Development Control: Planning For Air Quality’.

Demolition and Construction

- 21
- The potential impacts from dust generated during the demolition and construction of the Proposed Development will be considered using the approach presented in the IAQM guidance for assessing impacts from construction activities^{Error! Bookmark not defined.}, upon which the GLA’s SPG⁴ is based. Consideration will also be given to the guidance set out within the LBS Technical Guidance for Demolition and Construction⁵. The cumulative impacts arising from schemes being constructed concurrently in the study area will also be considered. Appropriate mitigation measures will be recommended based on the outcome of the dust risk assessment. The

⁴ GLA (2014) The Control of Dust and Emissions from Construction and Demolition SPG
⁵ LBS (2016) London Borough of Southwark Technical Guidance for Demolition and Construction

IAQM guidance is clear that, with appropriate mitigation in place, the residual effects will normally be 'not significant'.

- 22** Emissions from construction plant (Non-Road Mobile Machinery; NRMM) will not be explicitly modelled, as relevant guidance from the IAQM states that *"experience from assessing the exhaust emissions from on-site plant (also known as non-road mobile machinery or NRMM) [...] suggests that they are unlikely to make a significant impact on local air quality and in the vast majority of cases they will not need to be quantitatively assessed"*. Significant effects as a result of NRMM emissions can thus likely be discounted. However, suitable mitigation measures for site plant will be presented as part of the mitigation measures based on advice presented in the IAQM guidance document and in accordance with the NRMM low emissions zone (LEZ).
- 23** The number of demolition and construction vehicles (including Heavy Duty Vehicles; HDVs) in use during the demolition and construction of the Proposed Development will be considered in the context of the screening criteria provided in the EPUK/IAQM guidance⁶. If the increase in HDV movements exceeds the screening criterion, then emissions from traffic generated during the demolition and construction works will be assessed quantitatively using the ADMS-Roads dispersion model. The IAQM screening criteria of a change of 100 Light Duty Vehicles (LDVs) / 25 HDVs Annual Average Daily Traffic (AADT) on roads within the AQMA will be used to define the study area.
- 24** If dispersion modelling is required, the scenarios that will be considered as part of the assessment will comprise:
- Current baseline scenario (2022);
 - Peak Construction Year without the Proposed Development, but including traffic generated by relevant cumulative schemes; and
 - Peak Construction Year, including traffic generated by relevant cumulative schemes and the construction of the Proposed Development itself.
- 25** The scale, nature and significance of the air quality effects associated with demolition and construction vehicles will be determined following the EPUK/IAQM guidance and appropriate mitigation measures will be recommended as necessary, based on the outcomes of the assessment.

Phasing

- 26** Properties constructed and occupied during the earlier phases of construction will be considered sensitive receptors to dust generated during construction of the later phases.

Completed Development

- 27** The number of vehicle movements generated as a result of the operation of the Proposed Development will be considered in the context of the screening criteria (25 HDVs or 100 LDVs) provided in the guidance from EPUK and the IAQM⁶. If the Proposed Development is predicted to lead to an increase in vehicle movements that exceeds the screening criteria, then emissions from traffic generated during the operational stage will be assessed quantitatively using the ADMS-Roads dispersion model. The model requires a variety of inputs, including road traffic data (flows, speeds and vehicle fleet composition) and meteorological data.
- 28** The energy strategy is not currently defined; however, should the Proposed Development include any centralised energy plant (e.g., CHP / large gas-fired boilers), and/or any diesel backup generators, the impacts of these plant will be assessed, initially, qualitatively based on the proposed size, location and emissions performance and the proposed testing schedule. Where it is not possible to discount potentially significant contributions to short-term NO₂ concentrations based on the schedule, the contribution of the plant will be determined using the ADMS-5 dispersion model and added to baseline concentrations (including road traffic contributions) to determine total concentrations.
- 29** The roads model will be used to predict concentrations of NO₂, PM₁₀ and PM_{2.5} for the following three scenarios:
- Baseline year (2022);

⁶ Moorcroft and Barrowcliffe et al (2017) Land-Use Planning & Development Control: Planning For Air Quality v1.2

- Opening year (earliest year of possible occupation/operation) without the Proposed Development, but including traffic generated by relevant cumulative schemes; and
 - Opening year (earliest year of possible occupation/operation) with the Proposed Development, including traffic generated by relevant cumulative schemes and the completed Proposed Development itself.
- 30** An important element of the modelling study will be to verify the ADMS-Roads model output against measured results. This will be undertaken by identifying suitable roadside air quality monitoring locations, against which the model performance can be compared.
- 31** Meteorological data will be taken from London City Airport, which is the nearest and most representative meteorological site to the Proposed Development. The year of meteorological data will be selected to match the baseline assessment year and the latest available monitoring data (2022).
- 32** Background pollutant concentrations will be determined using data derived from the background maps published by Defra⁷.
- 33** The overall effect will be evaluated using criteria recommended by EPUK/IAQM⁶ and will be determined based on predicted impacts at receptors and professional judgement. Where required, mitigation measures will be proposed to ensure that residual effects are not significant.

Air Quality Neutral Assessment

- 34** The consultation draft of GLA's London Plan Guidance (Air Quality Neutral)⁸ sets out guidance on how an 'air quality neutral' assessment should be undertaken and aims at ensuring that new developments meet this status. This will involve the calculation of emissions associated with the buildings and transport generated by their use. These emissions will then be compared with published benchmarks. Any excess emissions over and above the benchmarks will need to be reduced by mitigation or off-set.

Air Quality Positive

- 35** The GLA has published draft consultation guidance⁹ to ensure large-scale developments deliver maximum air quality benefits and improvements and incorporate best practice and good design measures to reduce exposure to air pollution as far as possible. An Air Quality Positive Statement will be included in the assessment which will set out the inherent measures included within the Proposed Development's design.

Cumulative Assessment

- 36** The cumulative construction dust effects of the Proposed Development and identified cumulative schemes will be considered based on the location and proximity of each scheme, and the IAQM Guidance for assessing impacts from construction activities.
- 37** Cumulative operational effects include those associated with road traffic emissions and combustion plant. If the Proposed Development leads to a net decrease in traffic, or an increase in traffic below the screening criteria, then cumulative road traffic impacts will be considered qualitatively. Otherwise, the inclusion of traffic generated by the cumulative schemes in the 'Opening year with the Proposed Development' scenario will ensure that cumulative effects are quantified. With regards to combustion plant sources, a review of nearby cumulative schemes will be undertaken to determine the cumulative impacts of any combustion plant sources.

⁷ Defra (2021) Local Air Quality Management (LAQM) Support Website

⁸ GLA (2021) London Plan Guidance – Air Quality Neutral. Consultation Draft

⁹ GLA (2021) London Plan Guidance – Air Quality Positive, Consultation Draft.

TOPIC SHEET

ARCHAEOLOGY

Introduction

It is considered that there is the potential for likely significant effects relating to archaeology and so this topic shall be **SCOPED IN** to the EIA. The ES Chapter will be supported by a technical appendix in the form of an Archaeological Desk-based Assessment (DBA). The Archaeology assessment and ES Chapter will be undertaken by Museum of London Archaeology (MOLA).

The ES archaeology assessment shall:

- Define the archaeology baseline conditions;
- Identify relevant archaeological receptors (buried heritage assets);
- Assess:
 - a. the potential for archaeological impacts throughout the demolition and construction works and as a result of the completed development;
 - b. the likely significant archaeological effects;
 - c. any required mitigation or monitoring to address any likely significant adverse archaeological effects.
 - d. the potential for cumulative archaeological effects is proposed to be scoped out.

Baseline Conditions

Current Baseline Conditions

- 1 The baseline conditions of the site in full will be presented in the Archaeological Desk Based Assessment (DBA) and summarised in the ES Chapter. A 250m radius study area was agreed to be appropriate during consultation with London Borough of Southwark's (LBS) archaeological advisor, for the collection of known historic environment data in order to adequately characterise the likely archaeological conditions within the site. Greater London Historic Environment Record (GLHER) data has been obtained and examined prior to the preparation of this scoping report. The GLHER unique search reference number is 16926, and the data license is valid until 09/03/2023.
- 2 The British Geological Survey online mapping suggests that the site overlies alluvial deposits and is located at the edge of a boundary in the drift geology between Woolwich beds and Floodplain gravels (Geological Survey of Great Britain, OS sheet 270). In such transitional zones the detail geology is very variable. However, in this instance the site occurs on an outcrop of the underlying London Clay. The periglacial and alluvial processes causing the formation of the gravels to the north will have scoured away the Woolwich/Gravel deposit exposing the underlying clay. The absence of any gravel is best accounted for by the natural slope dipping from south to north.
- 3 The site is located within the Tier 2 Archaeological Priority Area (APA) of Peckham Village. It has been classified as Tier 2 because it contains the following positive indicators:

- Area of historic settlement;
- A burial ground of 19th century or earlier origin; and
- Conservation areas with archaeological interest (Rye Lane Peckham, Peckham Hill Street).

- 4 The site does not contain any nationally designated (protected) heritage assets, such as world heritage sites, scheduled monuments, listed buildings or registered parks and gardens.
- 5 An archaeological investigation has been carried out within the site, including an archaeological evaluation and excavation by MoLAS in 1996 (sitecode HAN96), and an additional 15 archaeological investigations in the study area, comprising seven evaluations, six watching briefs and two excavations. The majority of which found post-medieval remains but several also found some evidence of activity from the prehistoric, Roman and medieval periods. The investigation within the site recorded evidence of prehistoric activity which was replaced by agricultural activity from the Roman period onwards. The site lies on the southern side of the village of Peckham, just outside the centre of the village and remained relatively undeveloped until the late 19th century.

Future Baseline Conditions

- 6 The evolution of the baseline is not relevant to the assessment of archaeology, as there would be no change expected to the below ground conditions on site prior to the Proposed Development commencing, and therefore any archaeological remains would remain as per the existing baseline condition.
- 7 In relation to the wider understanding of archaeology in the area, should new information come to light in the course from any archaeological works in the study area, this may enhance the understanding of the baseline conditions at the site.

Receptors

- 8 The term 'significance' is used in the National Planning Policy Framework (NPPF), for the 'value' of a heritage asset, and in this section is used to categorise the relative value of designated and non-designated sensitive receptors.
- 9 The NPPF defines a heritage asset as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. In line with the NPPF, for the purposes of the ES Chapter, archaeological 'receptors' will be referred to as 'buried heritage assets', and heritage 'significance' will be used in place of 'sensitivity'. The use of heritage 'significance' and 'significance of an effect' on a buried heritage asset will clearly differentiated throughout the Chapter.
- 10 The currently identified potential assets (sensitive receptors) that will be affected by the proposed developer and considered in the archaeological impact assessment include, but are not limited to, the following:
 - Prehistoric remains including isolated redeposited remains and evidence of settlement;
 - Agricultural remains, e.g. ditches, from the Roman period onwards; and
 - Post-medieval building remains.

Assessment of Effects

Policy and Legislation

- 11 The ES Chapter and the archaeological DBA will be undertaken in accordance with the requirements of the NPPF, the London Plan, Southwark Local Plan, and to standards set by the Chartered Institute for Archaeologists, Historic England, and the Greater London Archaeological Advisory Service (GLAAS) as set out below:
 - The National Planning Policy Framework, revised July 2021. (Ministry of Housing, Communities and Local Government);
 - The London Plan: The Spatial Development Strategy for Greater London (GLA 2021), adopted in March 2021;

- Southwark Local Plan 2022, adopted in February 2022;
- Chartered Institute for Archaeologists, 2014, Standards and Guidance for Commissioning Work or Providing Consultancy Advice on Archaeology and the Historic Environment, published December 2014;
- Chartered Institute for Archaeologists, 2017, Standards and Guidance for Historic Environment Desk-Based Assessment, updated January 2017;
- English Heritage, 2008, Conservation Principles, Policies and Guidance;
- Greater London Archaeological Advisory Service, 2015, Guidelines for Archaeological Projects in Greater London;
- Historic England, 2015, The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning, Second Edition;
- Historic England, 2015, Managing Significance in Decision-Taking in the Historic Environment – Historic Environment Good Advice in Planning, Second Edition;
- Historic England, 2017, Conservation Principles for the Sustainable Management of the Historic Environment, Consultation Draft 10th November 2017; and
- Historic England, 2019, Piling and Archaeology: Guidance and Good Practice.

Demolition and Construction

Potential Effects

- 12** The assessment will focus on the physical impacts of the Proposed Development on buried heritage assets. These will take place entirely during the demolition and construction of the Proposed Development and will include any processes which would result in ground disturbance (for example, ground reduction for the construction of new foundations, basements, lift pits, dewatering (if required), incorporation of new landscaping, incorporation of new drainage and services etc.).
- 13** Physical impacts upon archaeological remains would all be permanent, whether or not the proposed demolition and constructions works are temporary in nature (e.g. ground excavation for temporary services, lighting and hoardings). Based on the baseline conditions noted above, the potential effects of the Proposed Development on buried heritage assets are anticipated to result from the truncation or removal of archaeological remains.

Scope of Assessment

- 14** The ES Chapter, which will be supported by an archaeological DBA, will present an assessment of potential demolition and construction effects.
- 15** DBA will use existing data to assess the likely presence of archaeological remains (i.e. 'buried heritage assets') and their associated significance on the site, and determine the potential impacts on asset significance arising from the Proposed Development. The data comprises information held in the GLHER and in the Museum of London Archaeological Archive. Other sources that will be consulted in the preparation of the DBA include the MOLA Geographical Information System, Historic England statutory designation information, the London Metropolitan Archive, historic Ordnance Survey maps provided by Groundsure, online data provided by the British Geological Survey (BGS), and web-published material including Southwark's Local Plan and information on conservations areas and locally listed buildings.
- 16** The DBA will cover archaeological remains, (such as buried deposits, features, structures, monuments or heritage landscape) within or immediately surrounding the study area, which are considered significant for their evidential, historic, aesthetic or communal interest.
- 17** Following the characterisation of the baseline historic environment in the DBA, the methods used to define and assess the potential effects of the Proposed Development in the ES will comprise:
- Evaluating the significance value of known or likely buried heritage assets (based on existing designation and professional judgement where assets have no formal designation);

- Predicting the magnitude of change (impact) resulting from the Proposed Development upon the significance value of known or potential buried heritage assets, and the resulting significance of the likely effect;
 - Determining the scale of the likely environmental effect by comparing the significance value of the baseline heritage asset with the magnitude of change (impact) upon that asset as a result of the Proposed Development;
 - Identifying any mitigation measures required to prevent, reduce or off-set any potential significant adverse environmental effects; and
- 18** Effects may be either adverse (negative) or beneficial (positive) in nature and are defined initially without mitigation:
- Adverse effects are those which detract from the significance of buried heritage assets by truncation or removal of the asset, with a consequent reduction in significance and understanding and appreciation of the asset and its context; and
 - Beneficial effects increase the significance of buried heritage assets for example by improved understanding and appreciation of the asset and its context, greater dissemination of information or increased public accessibility.
- 19** Where information is insufficient to be able to quantify either the receptor significance or magnitude of change with any degree of certainty, the effect will be given as 'uncertain'.
- 20** An appropriate mitigation and offsetting strategy will be set out in the EIA with the aim of reducing or offsetting any adverse effect (i.e. resulting in no significant residual effects). Measures to mitigate effects would normally consist of design adjustments, to allow significant resources to be protected and retained (preservation in situ) or, where this is not feasible, investigation and recording before and during development, with dissemination at an appropriate level (i.e offsetting).
- 21** Any residual effects (those that remain after mitigation has been implemented) will be concluded.

Phasing

- 22** The worst case assessment in relation to the impact on archaeological assets is for the completed Proposed Development. Impacts on archaeological remains occur during the enabling, demolition and construction stage, regardless of phasing, where ground disturbance takes place. Additionally, no assets will be introduced as a result of the phasing of the Proposed Development. As such, an assessment of individual phases has been scoped out.

Completed Development

- 23** The completed and operational Proposed Development would not result in any further ground disturbance; consequently, there would be no additional impacts or resulting effects upon any remaining buried heritage assets, and no further assessment of the completed and operational Proposed Development will be required. As such, an assessment of the completed and operational Proposed Development has been scoped out.

Cumulative Assessment

- 24** An assessment of cumulative effects will be scoped out of the Chapter. Cumulative effects are 'elevated' effects which occur where the combined effect of the Proposed Development with other proposed schemes in the vicinity, on a discrete and significant shared asset/resource, is more severe than that reported at the Proposed Development site alone. This is on the basis that for intangible and deeply buried heritage assets it is not feasible to quantify accurately the nature of the resource across the assessment study area, which would enable the identification of a cumulative impact and potential elevated effect.

TOPIC SHEET

CLIMATE CHANGE AND GREENHOUSE GASES

It is considered that there is the potential for likely significant effects relating to climate change and greenhouse gases (GHG), and so this topic shall be 'scoped in' to the EIA.

The consideration of climate within an EIA is stipulated within the EIA Regulations which subsequently outlines a requirement for a description of 'the impact of the project on climate' and 'the vulnerability of the project to climate change' (Schedule 4, paragraph 5(f)). Based on this requirement and that it is considered that there is the potential for likely significant effects relating to climate change, this topic shall be scoped into the EIA and a specific Climate Change and Greenhouse Gases ES chapter will be included, which will comprise of two parts as follows:

- **Part A:** Climate Change Resilience and Adaptation (including In-Combination Climate Change Impacts) – this is authored by Trium.
- **Part B:** Greenhouse Gas Emissions Assessment – this is authored by Air Quality Consultants Ltd (AQC).

Part A: Climate Change Resilience and Adaptation

- 1 The assessment of the impact of climate change on the Proposed Development will take the form of a climate resilience and adaptation assessment which will consider:
 - The risks of future climate change on the Proposed Development and the design measures implemented to reduce the impact of these risks; and
 - The potential for in-combination climate change effects which is an assessment of whether future climate change might increase or reduce the environmental effects of the Proposed Development.
- 2 The approach to assessing the potential impact of climate change on the Proposed Development will be undertaken with reference to the IEMA guidance 'Climate Change Resilience and Adaption'¹ which presents a framework for the consideration of climate change resilience and adaption in the EIA process. It recognises a need for a proportionate approach to the assessment, due to the uncertainties associated with predicting how the environment will respond to climate change.
- 3 The chapter and accompanying technical appendix will define the future climate scenario, through the use of the future climate projections published by the Met Office (through the UK Climate Projections (UKCP18) website²). Projections for variables including annual mean temperatures, and annual changes in summer and winter precipitation will be set out.
- 4 The future climate change scenario will be defined based on the recommended approach set out in the IEMA guidance, using a high emissions scenario (RCP8.5) for 2080 as the future baseline (based on a typical estimated lifetime of the Proposed Development of 60 years in accordance with British Standard EN 15978:2011³). The projected change to the range of climatic conditions will adopt the 50% probability level,

which is a central estimate adopted given the level of uncertainty associated with predicting the modelled scenarios.

- 5 The future climate change scenario will be discussed with the design team to identify where resilience and adaptation measures might need to be incorporated into the Proposed Development. The key factors that will be considered are:
 - Increase in annual and maximum temperatures; and
 - Increase in precipitation/intense rainfall events.
- 6 Due to the level of uncertainty in both the future climate projections and how the future climate conditions may affect sensitive receptors, the assessment of the Proposed Developments' resilience and adaptation to the future climate change scenario is qualitative (determining whether or not there is the risk of significant effects as a result of climate change impacts on/in conjunction with the Proposed Development), based on objective professional judgement, unless where there is published, accepted quantifiable methods available (i.e., in relation to the assessment of flood risk).
- 7 In addition, the future climate change scenario will be considered by each of the technical topics covered within the ES ('In-Combination Climate Change Impacts') to identify 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 Proposed Development will be worse or improve under the future baseline, and therefore if these changes alter the significance of effects identified for the Proposed Development under the current condition (without climate change). The outcome of this will be presented within Part A of the chapter.

Part B: Greenhouse Gas Emissions Assessment

- 8 The ES GHG assessment shall:
 - Define the GHG baseline conditions;
 - Assess:
 - a. The potential for GHG impacts throughout the demolition and construction works and as a result of the completed development and resultant GHG effects;
 - b. The resultant likely significant GHG effects; and
 - c. Any required mitigation or monitoring to address any likely significant adverse GHG effect
- 9 The GHG assessment will be conducted in accordance with the principles set out in the following policies and guidance:
 - National Planning Policy Framework⁴;
 - Climate Change Act 2008;
 - Climate Change Act 2008 (2050 Target Amendment) Order 2019;
 - Energy Act 2013;
 - Climate Change and Sustainable Energy Act 2006;
 - The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting⁵;
 - The Clean Growth Strategy⁶;
 - Approved Documents L1A and L2A;
 - The London Plan⁷;

⁴ Department for Levelling Up, Housing and Communities (2021) National Planning Policy Framework

⁵ Department for Environment, Food and Rural Affairs (2018) The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting

⁶ Department for Business, Energy and Industrial Strategy (2017) The Clean Growth Strategy

⁷ Greater London Authority (2021) The London Plan 2021: The Spatial Development Strategy for Greater London

¹ IEMA (2020) EIA Guide to Climate Change Resilience and Adaptation

² <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/download-data>

³ British Standard BSEN 15978:2011. Sustainability of construction works. Assessment of environmental performance of buildings. Calculation method.

- London Environment Strategy⁸;
- Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy⁹;
- London Borough of Camden Local Plan¹⁰;
- IEMA 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (2022)¹¹.

10 The greenhouse gas element of the ES chapter will be undertaken by Air Quality Consultants (AQC).

Baseline Conditions

11 An appropriate baseline will be determined based on the availability of information. Where information is available, baseline carbon dioxide equivalent (CO₂e) emissions relating to the current operation of the site in terms of transport and energy emissions will be calculated. Transport emissions will be calculated based on the number of transport trips generated by the current operation of the site and available data on travel distances, taking account of the mode of transport. Energy emissions will be calculated taking account of current energy consumption of the site (electricity and gas). Should data on the existing use of the site be unavailable, a worst-case assumption will be used whereby the baseline transport and energy emissions are assumed to be zero.

Receptors

12 GHGs contribute towards climate change, which is a global-scale cumulative effect, but do not cause direct local or regional effects, therefore no specific receptor locations are assessed in the GHG assessment. Instead, the global climate is the only receptor considered.

Assessment of Effects

13 The approach to assessing the potential impact of the Proposed Development on climate will be undertaken in accordance with the Institute for Environmental Management and Assessment (IEMA) guidance⁹. This guidance sets out a 'good practice' approach to achieving a proportionate assessment of a development's potential impact on climate and communicating the results in terms of a notional percentage contribution relative to a carbon budget, together with appropriate mitigation.

14 The guidance presents a series of principles developed by IEMA, which highlight that all GHG emissions contribute to climate change, and that the combined effect of all emissions draws us closer to the scientifically defined environmental limit for climate change. The IEMA guidance assigns significance criteria to the impact of a development's lifecycle GHG emissions, relative to its alignment with the UK Government's decarbonisation targets to achieve Net Zero Carbon by 2050, and limit global temperature increase to 1.5°C above pre-industrial levels. In order for a development to comply with the 1.5°C trajectory of decarbonisation, mitigation is encouraged early and throughout the design process, in line with IEMA's acknowledgement that the ability to effect change to achieve GHG emissions reduction for a project reduces over time.

15 Consistent with the guidance, the approach taken in the EIA will be to:

- Quantify the lifecycle GHG emissions from the Proposed Development;
- Compare the lifecycle GHG emissions against an existing carbon budget projected trajectory that complies with the UK's requirement to be Net Zero by 2050;
- Evaluate the consistency of the Proposed Development with relevant policies as national, regional and local scale that relate to GHG emissions; and
- Evaluate the robustness and effectiveness of mitigation measures designed to minimise GHG emissions throughout the lifetime of the Proposed Development.

⁸ Greater London Authority (2018) London Environment Strategy

⁹ Greater London Authority (2011) Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy

¹⁰ London Borough of Camden (2017) Camden Local Plan

¹¹ Institute of Environmental Management and Assessment, 2022. Institute of Environmental Management and Assessment (IEMA) Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance, 2nd Edition

16 These key components will be used to evaluate the significance of the Proposed Development's impact on climate change in line with the IEMA guidance.

17 The lifecycle GHG footprint for the Proposed Development will include the following emissions sources:

- Embodied carbon in construction materials;
- Construction transport;
- Construction site activities (fuel and energy consumption and waste);
- Operational energy consumption;
- Operational transport; and
- Repair, maintenance and refurbishment during the Proposed Development's life.

18 IEMA guidance allows elements of a project's GHG footprint to be scoped out where they contribute only a small proportion of the lifecycle emissions. For the Proposed Development, the elements scoped out of the assessment will include construction site activities (i.e. energy and fuel use associated with demolition and construction), operational waste, and water supply and treatment. As the Proposed Development is designed with a lifetime that extends well beyond 2050, when the UK has committed to net zero carbon, the emissions from decommissioning of the development at the end of its life are assumed to be net zero and scoped out of the assessment.

19 The Proposed Development's GHG emissions will be contextualised against relevant carbon budgets and appraised in their compatibility with the UK's trajectory to net zero 2050.

20 The ES will include a review of the compliance of the Proposed Development to relevant policies relating to GHG emissions, such as Part 14 of the NPPF, and local policies relevant to energy and sustainable transport.

21 The ES will present the carbon mitigation being proposed, which will follow the principles of the carbon management hierarchy (i.e., avoid, reduce, off-set), in order to reduce, as far as reasonably practicable, the anticipated GHG emissions over the Proposed Development's lifecycle.

22 The assessment of GHG emissions will draw together these analyses to determine the significant effects associated with GHG emissions, which will be presented in the ES chapter. Relevant information relating to carbon mitigation measures will be presented within the ES chapter describing the Proposed Development and the Demolition and Construction ES chapter.

Cumulative Effects

23 As set out in the IEMA guidance "*GHG emissions from all projects will contribute to climate change; the largest interrelated cumulative environmental effect*". This statement relates to 'cumulative' on a global scale as all emissions of GHG's contribute to climate change. The definition of 'cumulative effects' in the context of greenhouse gases 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. The GHG assessment is therefore intrinsically a cumulative assessment and no consideration to specific local cumulative schemes is required.

TOPIC SHEET

DAYLIGHT, SUNLIGHT, OVERSHADOWING, LIGHT SPILLAGE & SOLAR GLARE

It is considered that there is the potential for likely significant effects relating to daylight, sunlight and overshadowing, and so these topics shall be **SCOPED IN** to the EIA. The daylight, sunlight and overshadowing assessment and ES Chapter will be completed by Point 2.

It is considered that significant effects relating to light spillage and solar glare are unlikely and as such this topic is **SCOPED OUT** of the EIA. While there are commercial units at ground floor level, given the nature of the largely residential-led mixed-use scheme it is unlikely that the Proposed Development will emit significant light pollution between the hours of 11pm and 6am; thus, a light pollution assessment is not required. Solar Glare is scoped out of assessment within the EIA, given there are no sensitive receptors such as railway signals or pedestrian crossings that would be adversely affected by the Proposed Development. Furthermore, it is envisaged that the extent of the glazing within the proposals will not be unusually large, and that the other façade materials will have a matt finish meaning that they would not produce specular reflections. As such, the pattern of solar reflections is likely to be similar to that for other buildings of this type, and therefore not unusual for an urban context. At this stage we therefore consider that a detailed solar glare assessment will not be required.

The ES daylight, sunlight and overshadowing assessment shall:

- Define the daylight, sunlight and overshadowing baseline conditions;
- Identify relevant residential and sensitive receptors;
- Assess:
 - a. the potential for daylight, sunlight and overshadowing, impacts throughout the demolition and construction works and as a result of the completed development;
 - b. the likely significant effects;
 - c. any required mitigation or monitoring to address any likely significant adverse daylight, sunlight and overshadowing effects; and
 - d. the potential for cumulative daylight, sunlight and overshadowing, effects.

Baseline Conditions

Current Baseline Conditions

- 1 The baseline daylight and sunlight conditions within each of the relevant surrounding residential properties will be defined by reference to the Vertical Sky Component ("VSC"), No Sky Line ("NSL"), and Annual Probable Sunlight Hours ("APSH") methods.
- 2 All residential properties which are considered to be in sufficient proximity to the site (see potential receptor list below) for their daylight and sunlight amenity to be potentially impacted by the Proposed Development have been included in the baseline assessment.
- 3 The technical analysis will be undertaken through the creation of a digital three-dimensional computer model of the site and surroundings. Where survey data is not available, building dimensions will be determined using Ordnance Survey (OS) data and site photographs.

- 4 The baseline level of overshadowing with regard to relevant surrounding amenity spaces will be defined in terms of the sun hours on ground assessment calculated on 21st March.
- 5 The assessment of current baseline conditions will include any neighbouring schemes that are currently under construction.

Future Baseline Conditions

- 6 Any neighbouring schemes that have received planning consent, but construction has not begun will be considered within the cumulative assessment (if required). This will include them in the assessment baseline, and the effects on them will be considered as required.

Receptors

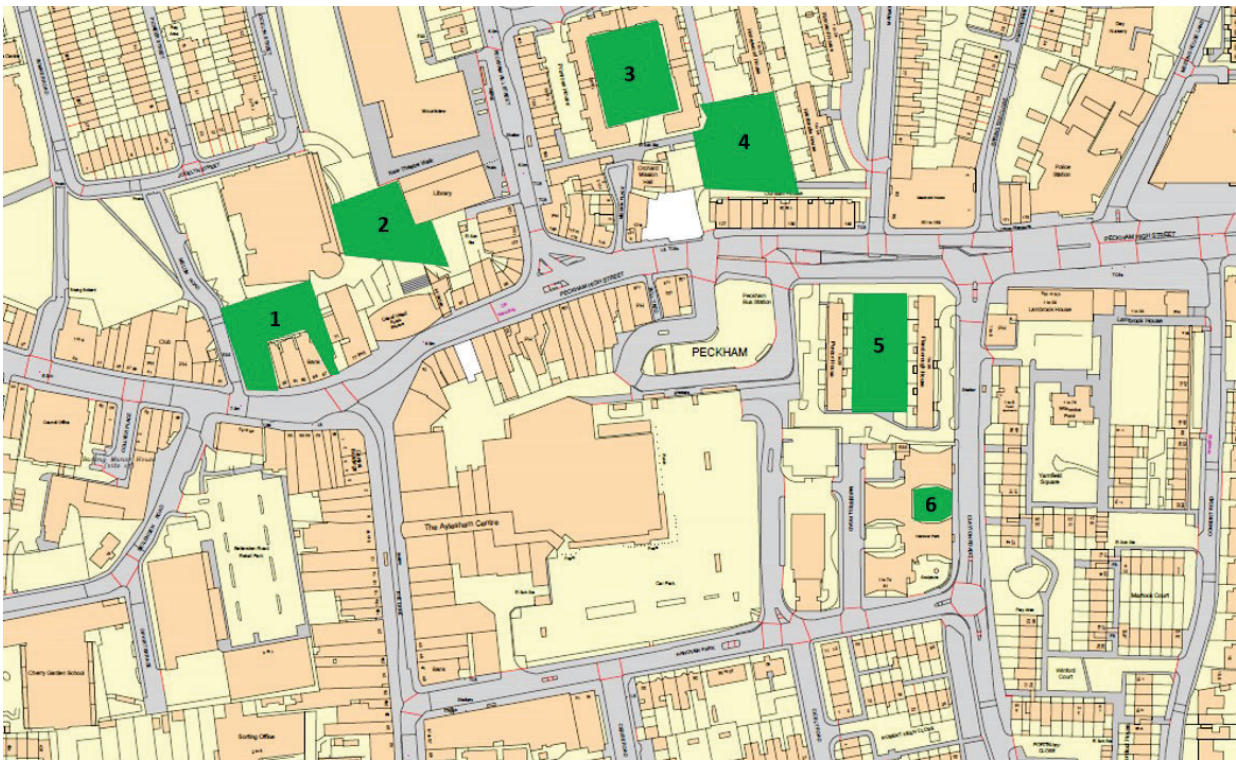
- 7 The following existing residential properties (shown in Figure 1) have been identified as having site facing windows and rooms which could experience an alteration in daylight and/or sunlight as a result of implementation of the Proposed Development :

1. Purdon House;	9. Nos. 2-6 Rye Lane;
2. Flamborough House;	10. Nos.1-5 Central Buildings;
3. 81 Hanover Park;	11. Roman House, 77 Peckham High Street;
4. Nos. 44-54 Hanover Park (even);	12. Nos.127-149 Peckham High Street, Dunstall House;
5. 11-12 Robert Keen Close;	13. 118-122 Peckham High Street;
6. Nos. 20-40 Hanover Park;	14. Nos.78-116 Peckham High Street;
7. Hanover Park House, 14-16 Hanover Park;	15. 74 Peckham High Street; and
9. Nos. 12-18 Rye Lane;	16. Nos.43-49 Rye Lane.
- 8 In line with 2022 BRE guidance, the effects on any neighbouring photovoltaic receptors will also be considered.
- 9 With regards to overshadowing, the following amenity areas are considered most sensitive due to being located to the north of the Proposed Development and require assessment.

Figure 1. Location of Existing Neighbouring Receptors (Daylight and Sunlight)



Figure 2. Location of Amenity Areas (Overshadowing)



Assessment of Effects

- 10 The assessment of daylight, sunlight and overshadowing will be based upon the Building Research Establishment guidelines, 2022, (“the BRE”) and BS EN 17037²¹ and will be defined by reference to the VSC and, NSL methods in respect of daylight assessments, the APSH method for sunlight assessment and by reference to the Sun Hours on Ground method in respect to overshadowing .
- 11 The daylight, sunlight and overshadowing will be based on a scale three-dimensional computer model of the following scenarios:
- Existing baseline condition;
 - Proposed Development; and
 - Cumulative schemes (to include any relevant nearby cumulative schemes).
- 12 Where detailed floor plan information for each property with the potential to be impacted by the Proposed Development is not available, reasonable assumptions as to the internal configuration of the rooms behind the fenestration are made. A standard 4.27m deep room is assumed unless the building form dictates otherwise. The use of rooms behind the fenestration are also assumed from external observation. This is usual practice when access is unavailable.

Policy and Legislation

- 13 Key documentation relevant to the consideration of daylight, sunlight and overshadowing, as follows :
- London Plan 2021²²;
 - National Planning Policy Framework (NPPF) (2021)²³;
 - Housing SPG 2016²⁴; and
 - Southwark Local Plan 2022²⁵.

Demolition and Construction

- 14 The potential temporary changes to daylight, sunlight and overshadowing, associated with the demolition and construction of the Proposed Development will be addressed in the ES Chapter. Owing to the evolving and changing nature of demolition and construction activities, a qualitative assessment will be undertaken using professional judgement. The worst-case scenario in terms of potential effects are shown in the assessment of the completed Proposed Development (see below for further details).

Phasing

- 15 Technical assessments will be considered with reference to the site wide development, i.e. the potential impacts caused by the Proposed Development as a whole will be considered for neighbouring receptors. This enables a worst-case scenario for potential impacts to be considered .

Completed Development

- 16 The Proposed Development would bring about a significant change to the massing of the site. This would likely result in changes to the availability of daylight and sunlight received within surrounding residential buildings. The amount of overshadowing cast on areas of open amenity spaces adjacent to the site would also be expected to change from the existing situation.

²¹ Building Research Establishment Guidelines “Site layout planning for daylight and sunlight: A guide to good practice”, BR 209 2022 Edition
²² The London Plan: The Spatial Development Strat for Greater London, March 2021
²³ National Planning Policy Framework, July 2021
²⁴ Housing: Supplementary Planning Guidance, March 2016
²⁵ The Southwark Plan 2019-2036, February 2022

- 17 The following likely significant effects with respect to daylight, sunlight and have been identified: change to the duration and quality of daylight and sunlight, as well as the incidence and duration and overshadowing experienced by surrounding receptors on completion of the Proposed Development.
- 18 The potential for daylight and sunlight availability within the newly proposed residential units and within the newly created public realm is dependent on the design of the Proposed Development, and is a design consideration. Therefore, the assessment of daylight and sunlight availability (including overshadowing) within the Proposed Development itself will not form part of the ES but will be presented as a separate standalone report submitted to accompany the planning application.
- 19 Sun Hours on ground and transient overshadowing assessments will be undertaken using the three-dimensional computer model in order to establish the extent to which surrounding areas of amenity space are affected by the Proposed Development.
- 20 The extent of the shadow cast by the Proposed Development will be assessed at hourly intervals at the summer and winter solstice and the spring equinox, which will be the same of that of the autumn equinox.

Cumulative Assessment

- 21 Following a review of the cumulative schemes detailed in Annex B, further detailed consideration of the cumulative schemes is not considered to be required.
- 22 The closest cumulative scheme to the site is Open Land Rear Of 1-51 Peckham High Street (Planning Application Reference: 16/AP/4018). However, this scheme is still located around 130 metres to the north-west of the site, behind properties fronting onto Peckham High Street. It will extend up to a maximum of 6 storeys. As such it would have no more than a negligible effect of any properties that would potentially be materially affected by the redevelopment of the site.

TOPIC SHEET

ECOLOGY AND BIODIVERSITY

Introduction

It is considered that significant effects relating to ecology and biodiversity are unlikely and as such this topic is **SCOPED OUT** of the EIA. The following section provides a summary of the baseline ecology and biodiversity conditions and clarifying why no likely significant effects are expected. This Topic Sheet has been prepared by Assystem.

A Preliminary Ecological Appraisal (PEA) was undertaken in February 2022 by Assystem comprising a desk study, and an extended Phase 1 Habitat Survey which included a protected species assessment and ecological evaluation of the existing buildings and habitats within the red-line boundary.

The PEA took account of the following best practice:

- Guidelines for Preliminary Ecological Appraisal. CIEEM 2017¹,
- Guidelines for Ecological Report Writing. CIEEM 2017².
- Guidelines for Accessing and Using Biodiversity Data in the UK. CIEEM 2016³,
- Combined Ecological Impact Assessment Guidelines. CIEEM 2018⁴,
- Joint Nature Conservation Committee Handbook for Phase 1 habitat survey. A technique for Environmental Audit. 2010⁵.

The objectives of the PEA were to:

- Identify any designated sites for nature conservation and habitats on, near and adjacent to the site;
- Identify any notable and / or protected plant or animal species of nature conservation value, which may occur on or near the site;
- Identify the presence of any invasive plant species on or adjacent to the site;
- Provide a habitat map with target notes of ecological features as identified above;
- Undertake a preliminary assessment of the potential impacts on any ecological receptors of conservation value identified on, near or adjacent to the site; and
- Recommend further surveys, mitigation, and enhancement measures as appropriate.

The survey and PEA have been prepared by Assystem and the PEA (2022) is appended in **Annex D: Preliminary Ecological Appraisal** of this EIA Scoping Report. Given the time elapsed from the original Phase 1 Habitat Survey, an updated Habitat Survey will be undertaken and the PEA report will be updated and submitted in support of the planning application.

¹ CIEEM (2017) <https://cieem.net/wp-content/uploads/2019/02/Guidelines-for-Preliminary-Ecological-Appraisal-Jan2018-1.pdf>

² CIEEM (2017) <https://cieem.net/wp-content/uploads/2019/02/Ecological-Report-Writing-Dec2017.pdf>

³ CIEEM (2016) <https://cieem.net/wp-content/uploads/2016/03/Guidelines-for-Accessing-and-Using-Biodiversity-Data-March-2020.pdf>

⁴ CIEEM (2018) <https://cieem.net/wp-content/uploads/2019/02/Combined-EcIA-guidelines-2018-compressed.pdf>

⁵ JNCC, (2010), Handbook for Phase 1 habitat survey – a technique for environmental audit, JNCC, Peterborough

A Biodiversity Net Gain Assessment will also be prepared and submitted with the planning application.

Baseline Conditions

- 1 The site is bordered by Rye Lane to the west, Hanover Park to the south, and McKerrell Road to the east. The surrounding area is largely comprised of commercial and residential uses, as well as Peckham bus station and depot adjacent north.
- 2 The site area is approximately 2.8 hectares (ha) and is currently occupied by a Morrisons supermarket and petrol station, which are connected to the Aylesham Centre. The Aylesham Centre is a wider retail space that exists within the site boundary. It offers retail space that faces onto Rye Lane. The main façade of the built structure is a brickwork building with a glass roof over the atrium of the building. The site is in a highly urban area and the habitats on the site are considered to be of low ecological importance.
- 3 During the survey, the potential of the site to support bats, black redstart, peregrine falcon and other nesting birds was reviewed. While built structures found on site offered some potential bat roosting features, it was deemed that the urban nature of the site, general light and noise pollution present, as well as absence of nearby bat records or nearby connecting habitats, reduced these features to have a negligible potential to support roosting bats, in accordance with the Bat Conservation Trust criteria⁶.
- 4 The trees present on site were surveyed to be in moderate condition, with negligible potential to support roosting bats.
- 5 No sightings of black redstarts have been recorded within 1km of the site within the previous 10 years. The site provides negligible potential for black redstarts and / or peregrine falcon. Black redstart requires areas of sparse wasteland vegetation and stony ground for feeding, and tall and complex structures with ledges and crevices for nesting, which are currently absent on the site. Existing levels of disturbance on the site and in the surrounding area would also likely discourage black redstart from nesting on the site, even if suitable habitat was present.
- 6 Pigeons and starlings were observed throughout the site, including pigeons within the Aylesham Centre. The scattered trees across the site have some potential to support nesting birds. Loss of structures and trees within the site would result in a loss of habitat for nesting birds.
- 7 Cotoneaster (*Cotoneaster* sp.) was recorded on site. Some species of this plant are listed on Schedule 9 of the Wildlife & Countryside Act and are considered an 'invasive species'.
- 8 The site is not located within any statutory or non-statutory nature conservation designations, and there are no sites with European or National statutory designation within 5km of the site. One Local Nature Reserve (LNR), Nunhead Cemetery, is located 1.5km to the south east of the site. It is also noted that within 1km:
 - Greenspace Information for Greater London (GiGL) identified ten Sites of Importance for Nature Conservation (SINCs) within 1km of the site, the majority of which are largely associated with recreational areas and parks. The nearest SINCs identified through GiGL are Grove Park Cuttings and Peckham Rye to East Dulwich Railsides, as well as Goldsmith Road Nature Garden, which are both located approximately 320m to the south-west of the site; and
 - The Southwark Plan 2022 also identifies additional SINCs, the nearest of which is Surrey Canal Walk, located approximately 125m to the north of the site.

Discussion for Scoping Out

- 9 In light of the above, the site is considered to have low ecological value, due to the habitats identified as being present on-site. The site is located in a heavily urban context and so indirect impacts from the Proposed Development on ecological features and designated sites is considered to be insignificant.

⁶ Hundt L (2012) *Bat Surveys: Good Practice Guidelines, 2nd edition*,. Bat Conservation Trust. ISBN-13: 9781872745985

Mitigation Measures and Design Recommendations

- 10 A number of measures are recommended within the PEA to both avoid or mitigate the impact on ecology and biodiversity during the demolition and construction works, as well as to provide opportunities to enhance the ecological value of the site, which would form part of the design and landscaping measures as the scheme evolves.
- 11 Measures for ecological enhancement and achieving biodiversity net gain are recommended to be considered within the design and will be reviewed by the design team to include where practicable. These include:
 - Planting of native tree and shrub species;
 - The use of good horticultural practice;
 - Installation of green roofs; and
 - Provision of wildlife boxes.
- 12 The following best environmental practice measures are recommended for implementation during the demolition and construction works include:
 - All wild mammals, including red fox, are protected by the Wild Mammals (Protection) Act 1996, which makes it an offence to intentionally cause any wild mammal unnecessary suffering by certain methods. Common wild mammals, such as red fox, may venture onto the site during the demolition and construction of the Proposed Development
 - To avoid an offence, measures should be employed during the demolition and construction phase, including the covering of all deep holes and trenches overnight and / or the provision of planked escape routes for any wildlife that may fall in. In addition, any liquids held on-site should be stored in a secure lock-up and hoarding should be erected around the perimeter of the site, to minimize the likelihood of any wild mammals gaining access to the site;
 - All birds, their active nests and eggs are protected from harm under the Wildlife and Countryside Act (WCA) 1981. This legislation makes it an offence to kill, injure or take any wild bird or to take, damage or destroy the nest of any wild bird while that nest is in use or being built. An offence could therefore occur during the course of any clearance and demolition work on the site
 - To avoid an offence under the WCA, ideally, the building should be demolished outside the bird-breeding season (i.e. between October and February inclusive). However, should this not be practical, it is recommended that a survey is undertaken by a suitably qualified ecologist immediately prior (within 48hrs) to the commencement of any such work, to check for the presence of any active birds' nests. Should any active birds' nests be found, the work may take place within an appropriate established buffer zone, which should be left intact until it has been confirmed that the young have fledged, and the nest(s) is no longer in use; and
 - When removing Cotoneaster from the site, it must be chipped or burnt on site or be removed to a licenced landfill as controlled waste.
- 13 In the unlikely event that a protected or notable species is found during demolition or construction of the Proposed Development, all works should stop, and an ecologist should be contacted.

Opportunities for Ecological Enhancement

- 14 Due to the nature of the site, there are opportunities for ecological mitigation and compensation (for example, for any trees that may be removed other trees are planted to replace those removed), as well as for substantial ecological enhancements as part of the proposals ensuring compliance with targets outlined by Southwark Council and London Biodiversity Action Plans (BAP). The Southwark Draft Biodiversity Action Plan 2020⁷ includes working to protect, enhance, and promote biodiversity.

⁷ Southwark Draft Biodiversity Action Plan 2020 https://consultations.southwark.gov.uk/environment-leisure/protecting-biodiversity-and-making-nature-accessib/supporting_documents/Draft%20BAP%2019V1.pdf

- 15 The Southwark Draft Biodiversity Action Plan 2020 details the need for Biodiversity Net Gain which is set to become mandatory in the planning process for Southwark. This will aim to identify and pursue opportunities for securing measurable net gains for biodiversity and continue to deliver ongoing and long-term management.
- 16 It is possible that with effective greening measures such as green walls, extensive green roofs and further tree planting that the Proposed Development could achieve extensive biodiversity net gains across the site.
- 17 Measures proposed to enhance the ecological value (and associated biodiversity benefits) of the site, will be described in the ES (**ES Volume 1, Chapter 4: The Proposed Development**).

Conclusion

- 18 The findings of the PEA conclude that the site is of low ecological value for habitats and the habitats on-site are considered to be of low suitability for the species which have been identified as having the potential to be found within the site.
- 19 The site has potential to support nesting birds (non-Schedule 1 species) within and on built structures on site as well as the vegetation present on site.
- 20 Based on the findings presented in the PEA, alongside the measures proposed to avoid potential impacts that could arise during demolition and construction works, it is considered that the Proposed Development is unlikely to generate any significant ecological effects. Additionally, through the appropriate design, the Proposed Development could provide opportunities for ecological enhancement, which would benefit the site and surrounding. Consequently, it is proposed that ecology is scoped out of the EIA. An updated PEA will be submitted in support of the planning application.

TOPIC SHEET

GROUND CONDITIONS AND LAND CONTAMINATION

Introduction

It is considered that there is the potential for likely significant effects relating to ground conditions and so this topic shall be **SCOPED IN** to the EIA. The Ground Conditions and Land Contamination ES Chapter will be undertaken by RMA Environmental Ltd.

The ES ground conditions assessment shall:

- Define the ground conditions baseline conditions;
- Identify relevant ground conditions receptors;
- Assess:
 - a. the potential for ground condition impacts throughout the demolition and construction works and as a result of the completed development and resultant ground conditions effects;
 - b. the likely significant ground conditions effects;
 - c. any required mitigation or monitoring to address any likely significant adverse ground conditions effects;
 - d. the potential of cumulative ground conditions effects.

This scoping report input has been based on the Phase 1 Land Contamination Desk Study Report (RMA Environmental; 2022 – **Annex E: Phase 1 Land Contamination Assessment**) which includes a Groundsure Enviro Insight and Geo Insight Report for the area, as well as a review of published information and information obtained from regulatory bodies. Given the time elapses, the Phase 1 Land Contamination Desk Study Report will be updated with up-to-date Groundsure EnviroInsight data and submitted as part of the ES chapter.

Baseline Conditions

Potentially Contaminative Land Uses

- 1 The Phase 1 Land Contamination Desk Study Report, included within **Annex E: Phase 1 Land Contamination Assessment** of the EIA scoping report, identifies historical and current land uses on site including a historical garage, historical and current electricity substations, existing buildings on site, as well as an associated car park and petrol station/car wash. Furthermore, the Groundsure EnviroInsight report (included within Appendix A of the Phase 1 Land Contamination Report) records a number of other potential historical and current sources of contamination within a 250m radius of the site.
- 2 A review of the historical uses of the site and surrounding area has identified industrial land use activities occurring from as early as 1871, where many industrial and commercial land uses were located within 250m radius of the site such as a train station and a nursery. In 1916, a timber yard was situated 150m north-west of the site. In 1950, the north-eastern extent of the site identified as Peckham Garage (London Transport) and an electricity substation was situated along the eastern boundary of the site. Other industrial and commercial land uses were located further north, east and west of the site. In 1962, the central extent of the site comprised of a

car park. The Aylesham Centre was later developed within the western extent of the site in 1985. In 1991, an additional electricity substation was identified within the south-western extent of the site. By 2001, Peckham Garage has been demolished to accommodate the extension of the Aylesham Centre and car park for a supermarket and petrol station.

- 3 Currently, the site comprises of Aylesham Shopping Centre and Morrisons supermarket within the western and north-western extent of the site, associated car park along the southern and north-eastern extent of the site and petrol station located within the south-eastern corner of the site.
- 4 A previous Phase 1 Environmental Assessment (Delta-Simons; 2021) undertaken for a previous unsubmitted planning application for the site states that asbestos containing materials (ACMs) are understood to be located within buildings on site and that various asbestos surveys have been undertaken on site over the recent years with an asbestos register reviewed annually and maintenance/removal work is carried out as necessary. The most recent asbestos re-inspection survey was conducted in 2020 for the site (Tetra Consulting, 2020) which recommended eight areas of ACMs for continued management. These areas mainly comprise of flooring in the form of thermoplastic tiles/vinyl flooring and one area with containing bituminous product within a sink unit. The Phase 1 Preliminary Risk Assessment and Geotechnical Desk Study (RPS, 2018) recommended that an asbestos refurbishment/demolition survey should be undertaken in advance of any works being carried out.

Soils and Geology

- 5 The British Geological Survey (BGS) online geology viewer and the BGS South London 1:50,000 Solid and Drift geology mapping indicates that the site is underlain by the superficial deposits of the Interglacial Lacustrine Deposits comprising clay and silt. The site is further underlain by the bedrock geology of the Lambeth Group comprising clay, silt and sand followed by the Thanet Sand Formation and Upper, Middle and Lower Chalk Groups.
- 6 In addition, the BGS 1:50,000 map series England and Wales sheet 270 for South London, shows that the site is located within an area of previously worked ground. The Groundsure Report further identified that the area of worked ground is located within the southern extent of the site.
- 7 Two BGS Historical Borehole records are located on site. The first borehole (TQ37NW138) is located in the far north-western corner of the site. It was drilled to a depth of 53.64m and has the following geological sequence:
 - Likely Made Ground (approximate thickness 3.4m);
 - River Drift Deposits (Interglacial Lacustrine Deposits) (approximate thickness 2.4m);
 - Woolwich and Reading Beds (Lambeth Group) (approximate thickness 12.5m);
 - Thanet Sand Formation (approximate thickness 10.0m); and
 - Upper Chalk (approximate thickness 25.5m).
- 8 Groundwater was identified in this borehole record at 8.0m below ground level (bgl).
- 9 The second borehole record is located along the northern boundary of the site (TQ37NW387) and was drilled to a depth of 15.24 m and indicates that made ground is approximately 0.30m thick which is then underlain by clay and sands. The varying thicknesses of made ground could be in relation to the site being underlain by previously worked ground and suggests historical infilling.
- 10 The site is within a high risk of Unexploded Ordnance (UXO) according to Zetica mapping. In addition, historical maps show evidence that the site was subject to bomb damage in World War Two and therefore it is recommended that a detailed UXO risk assessment is undertaken at the site prior to any works.
- 11 The site is in an area where between 1%-3% of properties are above the Action Level for radon, however no radon protection measures are considered to be necessary for the proposed development.

Hydrology and Hydrogeology

- 12 The closest watercourses to the site are the Ravensbourne River (located 3 km east of the site) and the River Thames (located 3.2 km north of the site), which are classified by the Environment Agency (EA) as a 'main river'

and the 'lost watercourse' known as the 'River Peck' which is located 370m south of the site and is culverted/ routed underground. The site falls within the Water Framework Directive (WFD) London surface water management catchment.

- 13 The superficial geology of the Interglacial Lacustrine Deposits is classified as Unproductive Strata, which are defined as *"rock layers or drift deposits with low permeability that have negligible significance for water supply or river base flow"*.
- 14 The bedrock geology of the Lambeth Group and Thanet Sand Formation are classified by the Environment Agency (EA) as a Secondary A Aquifer where *"permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers"*.
- 15 The Chalk is classified by the EA as a Principal Aquifer, which are known as *"layers of rock or drift deposits that have high intergranular and/ or fracture permeability – meaning they usually provide a high level of water storage. They may support water supply and/ or river base flow on a strategic scale. In most cases, principal aquifers are aquifers previously designated as major aquifer"*.
- 16 According to the Groundsure reports, there are no licensed groundwater or surface water abstractions on site or within a 1km radius of the site.
- 17 The site is shown to be located within a WFD groundwater body of the Greenwich Tertiaries and Chalk which had an overall rating of 'poor' in 2019.
- 18 It is noted that the site does not lie within a groundwater Source Protection Zone (SPZ).

Receptors

- 19 The sensitive receptors associated with ground conditions and which will be assessed within the ES Chapter are:
 - Soils and geology;
 - Groundwater (likely to be located within the Lambeth Group, Thanet and Chalk);
 - Surface Water;
 - Demolition, Construction workers and service maintenance workers;
 - Future site users;
 - Adjacent site users; and
 - Infrastructure such as buried services.

Assessment of Effects

- 20 The ES Chapter will identify and assess the effects of the Proposed Development on ground conditions, during both the demolition and construction works, and once complete and operational.
- 21 The significance of each potential impact during demolition and construction and once completed and operational will be assessed using an approach which is broadly based on the established methodology from the Transport Analysis Guidance (TAG) Environmental Impact Appraisal¹ and the sensitivity of each receptor, magnitude of each impact and effect significance (adverse or beneficial) of each impact will determine whether mitigation measures will be required. Mitigation measures will subsequently be identified (where necessary) to reduce the impact and following this the residual impact can be identified.

¹ Gov. (2021). *Transport Analysis Guidance – Unit A3 Environmental Impact Appraisal*.

Policy and Legislation

- 22** The ground conditions assessment will be undertaken with reference to the following key policy and guidance documents:
- National Planning Policy Framework (NPPF) (2023)²;
 - Part 2A Environmental Protection Act (EPA; 1990)³;
 - Environment Agency Land Contamination Risk Management (LCRM) (EA, 2020)⁴;
 - Managing and Reducing Land Contamination: Guiding Principles (GPLC, EA 2016)⁵;
 - NHBC Part 4 Foundations – Chapter 4.1 Land Quality: Managing Ground Conditions (NHBC, 2021)⁶;
 - The London Plan (2021)⁷; and
 - The Southwark Plan (2022)⁸; and other relevant planning policy and guidance documents.
- 23** The review has been undertaken in accordance with best practice guidance on the assessment of development projects with regard to ground conditions, including that provided by the Institute of Environmental Management and Assessment (IEMA)⁹.

Demolition and Construction

- 24** The likely significant environmental effects associated with the Proposed Development in relation to ground conditions are as follows:
- Surface water, groundwater and soil contamination from general construction and demolition-related activities;
 - Remobilisation of any existing contamination and creation of contaminant pathways via leaching and/or migration during demolition and construction, such as piling for construction activities;
 - Potential for off-site users inhaling, ingesting or coming into dermal contact with windblown contaminated dust during construction;
 - Potential for demolition/ construction workers coming into direct contact with contaminated soils;
 - Potential effects of existing ground conditions or any residual contaminants on infrastructure and construction materials for the development;
 - Potential ground gas generation/migration and/ or accumulation within lower levels of the development and its potential impact on construction workers and infrastructure; and
 - Potential for building materials and infrastructure, construction/demolition workers and adjacent site users to be exposed to UXO and potential leaching/pollution from existing UXO on soils, hydrogeology and hydrology.
- 25** Given the materials on the site are not considered to represent workable land-based reserves of aggregate, the Proposed Development will have no material effect on the mineral resources in the vicinity of the site and will therefore not be considered any further.

² Department for Levelling Up, Housing and Communities. (2023). *National Planning Policy Framework*

³ Department for Environment, Food & Rural Affairs. (2012). *Environmental Protection Act 1990: Part 1 A. Contaminated Land Statutory Guidance*

⁴ Environment Agency. (2020). *Land Contamination Risk Management (LCRM)*

⁵ Environment Agency. (2016). *Managing and reducing land contamination: guiding principles (GPLC)*

⁶ National House Building Council. (2021). *Part 4 Foundations – Chapter 4.1 Land Quality: Managing Ground Conditions*.

⁷ Mayor of London. (2021). *The London Plan. The Spatial Development Strategy for Greater London*.

⁸ London Borough of Southwark. (2022). *The Southwark Plan 2019-2036*.

⁹ Institute of Environmental Management and Assessment. (2016). *Environmental Impact Assessment Guide to: Delivering Quality Development*

Phasing

- 26** The potential contamination impacts associated with each phased area will be the same as the construction impacts considered above. Each phase will be considered as its own site and the mitigation measures proposed for the construction phase effects above will be undertaken for each phase to ensure that there are no adverse impacts on the adjacent operational phase(s).

Completed Development

- 27** The likely significant environmental effects associated with the Proposed Development in relation to ground conditions once completed and operational are as follows:
- Potential contamination from routine site operations (e.g. drainage) and/ or accidental releases during the Proposed Development's operational life;
 - Potential effects of existing ground conditions or any residual contaminants on infrastructure and construction materials for the development;
 - Potential future site users, services and maintenance staff and proposed planting coming into direct contact with Contaminated soils and groundwater
 - Potential ground gas generation/migration and/ or accumulation within lower levels of the development and its potential impact on future site users and infrastructure; and
 - Potential for building materials and infrastructure, and future site users and adjacent site users to be exposed to UXO and potential leaching/pollution from existing UXO on soils, hydrogeology and hydrology.

Cumulative Assessment

- 28** The cumulative schemes will be listed and described in the upfront sections of the ES, and these will be considered in the Ground Conditions ES Chapter in relation to ground conditions and contamination.

Conclusion

- 29** The ES Chapter will be supplemented by the Phase 1 Land Contamination Desk Study Report which will be updated with up-to-date Groundsure EnviroInsight data and appended to the ES Chapter. Given the historical land uses at the site, it is considered likely that further site investigation works as well as ground gas monitoring will be recommended for the Proposed Development, and these can be controlled via a suitably worded planning condition. The ES Chapter will assess the worst-case scenario for the site in relation to Ground Conditions.

TOPIC SHEET

HUMAN HEALTH

Introduction

In line with the EIA Regulations¹, the impacts of human health have been considered in this scoping report. The EIA Regulations require the consideration of the potential effects on human health where significant effects are likely to occur. The assessment should be proportionate to the project being considered.

It is considered that significant effects relating to human health are unlikely and as such this topic is **SCOPED OUT** of the EIA. A Health Impact Assessment (HIA) will however be prepared by Quod, in line with the LBS' validation requirements, and submitted in support of the planning application.

Baseline Conditions

- 1 The site is currently occupied by the Aylesham Shopping Centre, a petrol station and car park. The Aylesham Shopping Centre accommodates a mix of existing retail uses including a large Morrisons supermarket.
- 2 The site is in Rye Lane ward within the LBS. However, the site is adjacent to Peckham ward, therefore both of these have been considered as representing the local area around the site.
- 3 Census data records the self-reported health status of the population. At the time of the 2021 Census, 86% of residents in Rye Lane ward and 84% of residents in Peckham ward reported being in very good or good health. This is compared to 86% in LBS and 85% in London as a whole.

Discussion for Scoping Out

- 4 Wider determinants of health relevant to the Proposed Development and potential human health effects at the population level have been considered in line with IEMA's guide to 'effective scoping of Human Health in Environmental Impact Assessment'². Those that are relevant to the Proposed Development based on the scale and nature of what is proposed are discussed below.
- 5 Where people live and work could have impacts on their health. Therefore, new developments could potentially have a beneficial or adverse effect on health, particularly in areas of existing poor health conditions. Poor health outcomes could arise from, for example, demolition and construction impacts such as noise, dust or pollution from construction traffic. Poor design and access in end uses could also have negative effects on health outcomes. However, through appropriate mitigation and design these effects can be managed and potentially give rise to either neutral or beneficial effects on human health at the population scale. For example, active travel measures, secured by design measures and provision of spaces that encourage physical activity and social mixing could have a beneficial effect on human health, although this is unlikely to be significant at the population level.

¹ His Majesty's Stationery Office (HMSO) 2017. *The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (amended in 2018 and 2020)*.

² Pyper, R., Lamming, M., Beard, C., Waples, H., Birley, M., Buroni, A., Douglas, M., Turton, P., Hardy, K., Netherton, A., McClenaghan, R., Barratt, T., Bhatt, A., Fenech, B., Dunne, A., Hodgson, G., Gibson, G., Purdy, J., Cave, B. (2022). *IEMA Guide: Effective Scoping of Human Health in Environmental Impact Assessment*.

- 6 At the wider societal level, greater access to adequate employment, housing and social infrastructure including schools, health services, open space, leisure and play facilities may be positively correlated with good health, but these effects will be uncertain and not measurable at the level of an individual site. The incidence of any such health effects will be widely dispersed through marginal changes to the wider housing and employment markets, and so the effect is not significant at the population level.
- 7 Despite the links that have been identified between new development and health, the potential effects of a new development on health would be largely determined by the way the Proposed Development's buildings and spaces are used, and further determined by lifestyle factors which cannot be accurately quantified or controlled at the planning stage. Planning and design cannot enforce how people ultimately use a development. These 'lifestyle factors' cannot be accurately quantified or controlled and are therefore considered to sit outside the role and scope of planning and EIA.
- 8 In line with the IEMA Guidance the EIA will not relay on other technical chapters to cover health. Health is being scoped out as it is not considered that the Proposed Development would have significant health effects at the population level. However, a number of other assessments that will be scoped into the EIA do provide a detailed assessment of effects that could relate to the wider determinants of health.
- 9 Therefore the position that no significant health effects are likely to arise will be kept under ongoing review as technical assessments are completed as part of the EIA. If significant residual effects are identified within the EIA which could have health impacts at the population level, a human health ES chapter will be prepared to bring together the relevant considerations.
- 10 The following assessments within the EIA will consider aspects that could link to potential human health effects arising from the Proposed Development:
 - Traffic and Transport;
 - Socio-Economics;
 - Air Quality;
 - Noise and Vibration;
 - Wind Microclimate; and
 - Climate Change and Greenhouse Gases.
- 11 Many of the standards and criteria against which these topics are assessed are based on thresholds which are informed by what is and is not acceptable in terms of human health. For example, air quality considers the impacts of a scheme in relation to pollutants such as nitrogen oxide (NO₂) and fine particulates (PM₁₀) which are known to have detrimental effects on human health as well as more generally on the environment. As such, measures will be identified as part of the technical assessment to reduce and/or minimise pollutants and adverse environmental effects resulting from the Proposed Development which could impact on human health. Residual effects on human health at the population level are not likely to be significant.
- 12 The socio-economic aspects of the Proposed Development that could have potential effects on human health include the provision of housing and jobs, increased population and demand on provision of community infrastructure. The assessment of these effects is scoped into the socio-economic assessment (refer to **Annex C: Socio-Economics Topic Sheet**). Whilst the socio-economic assessment will not consider the scale and significance of these effects specifically in relation to human health, areas such as greater access to employment and open space are recognised to be positively correlated with good health. However, given the scale of this scheme, these effects are not likely to have a significant effect on human health at the population level.

Mitigation Measures and Design Recommendations

- 13 Based on the findings of the various assessments, the Applicant will prepare a strategy for the demolition and construction works and implement environmental management measures to manage the construction of the Proposed Development, addressing issues related to health including public safety, noise and vibration controls, and air and dust management. These management measures will form part of a Construction Environmental Management Plan (CEMP), which will be secured through an appropriately worded planning condition.

Conclusion

- 14 Considering relevant wider determinants of health, proposed mitigation, and the scale and nature of the Proposed Development, significant residual health effects at the population level are not likely, therefore human health as an ES Chapter is proposed to be scoped out of the EIA.
- 15 This position will be kept under ongoing review as technical assessments are completed as part of the EIA. If significant residual effects are identified within the EIA which could have health impacts at the population level, a human health ES chapter will be prepared, however this is not considered likely for the reasons outlined above.
- 16 In line with the LBS' validation requirements, a standalone Health Impact Assessment (HIA) will be submitted in support of the planning application. The HIA will consider wider determinants of health related to the topics considered within the EIA but will also have a broader scope covering issues that fall beyond the scope of EIA. Whilst all health impacts identified within the HIA are not expected to be significant at the population level, the HIA will identify relevant measures to maximise positive health outcomes and minimise negative health impacts. The exact scope of the HIA will be determined through a separate consultation process with Southwark Council.

TOPIC SHEET

LAND TAKE AND SOILS

Introduction

It is considered that significant effects relating to land take and soils are unlikely and as such this topic is **SCOPED OUT** of the EIA. This Topic Sheet has been prepared by Trium.

In response to the requirements of Regulation 4(2) of the EIA Regulations, consideration has been given to the potential for any effects arising because of the Proposed Development on 'Land Take' and 'Soils'. It is anticipated that the potential effects on land and soil to be considered relate specifically to land take and soil sealing (i.e. the covering of the ground by an impermeable material).

Land take involves the increase of urbanisation over time, which can ultimately lead to soil sealing (from new buildings or increased hardstanding), resulting in effects such as, but not limited to, the following:

- The loss of permeability / water retention areas and, therefore, generating an increase in surface water runoff and flood risk;
- The reduction in evapotranspiration (due to an increased absorption of energy from the sun, caused by asphalted or concrete surfaces, roofs and stone factors), when combined with heat, creates the urban heat island effect, which is particularly serious for the health of vulnerable groups of people such as chronically ill and the elderly;
- The loss of vegetation, which can play an important role in capturing and absorbing polluting gases; therefore, trees and shrubs can have an indirect effect on air quality, as they can influence wind speed and turbulence; and
- Changes to the microclimate, due to sealed surfaces having higher surface temperatures than green surfaces, ultimately contributing to global warming.

Discussion for Scoping Out

- 17 The Proposed Development represents an opportunity to redevelop the site in a bespoke and sustainable manner. Regeneration of this nature will lead to a range of economic benefits, specifically relating employment. In addition, the development of the site will provide improved public realm, connectivity, surveillance and aesthetic (visual) enhancements over the existing situation.
- 18 The site is not a 'greenfield site'; it is not natural or semi-natural land that is being 'taken up' by urban development. In addition, the site does not represent open space. The site currently comprises a mix of private and publicly accessible space within an already built-up environment, and through the Proposed Development the site will be redeveloped and replaced with similar land uses but of a higher quality. As a result, no likely significant effects associated with 'Land Take' are anticipated because of the Proposed Development. Based on the above, land take shall not be considered further within this ES.
- 19 With regards to 'Soil', it is likely that the site and surrounding area have had a number of potentially contaminative land uses indicating possible historic contamination of the soil on site. On this basis, soil contamination is as considered earlier within the 'Ground Conditions / Geoenvironmental' section of this EIA Scoping Report.

Conclusion

- 20** In conclusion, with the implementation of appropriate mitigation / management measures, it is considered that the Proposed Development is unlikely to give rise to significant residual effects on land and soil. Therefore, it is proposed that land take and soils is scoped out of the EIA.

TOPIC SHEET

NOISE AND VIBRATION

It is considered that there is the potential for likely significant effects relating to noise and vibration and so this topic shall be **SCOPED IN** to the EIA. The noise and vibration assessment and ES Chapter will be carried out by Hann Tucker.

The ES noise and vibration assessment shall:

- Define the noise and vibration baseline conditions;
- Identify relevant noise and vibration receptors;
- Assess:
 - a. Noise and vibration from demolition and construction activities from the Proposed Development site;
 - b. Noise from construction traffic associated with the Proposed Development. This will include changes to traffic flow on surrounding public roads and site ingress and egress points;
 - c. Noise from building services plant associated with the complete operational Proposed Development;
 - d. Noise generated from proposed commercial units within the Proposed Development; and
 - e. Noise from operational road traffic from the complete operational Proposed Development and from Completed nearby schemes.
- Identify the likely significance of any noise and vibration effects;
- Propose any required mitigation or monitoring to address any likely significant adverse noise and vibration effects; and
- The potential for cumulative noise and vibration effects.
 - f. .

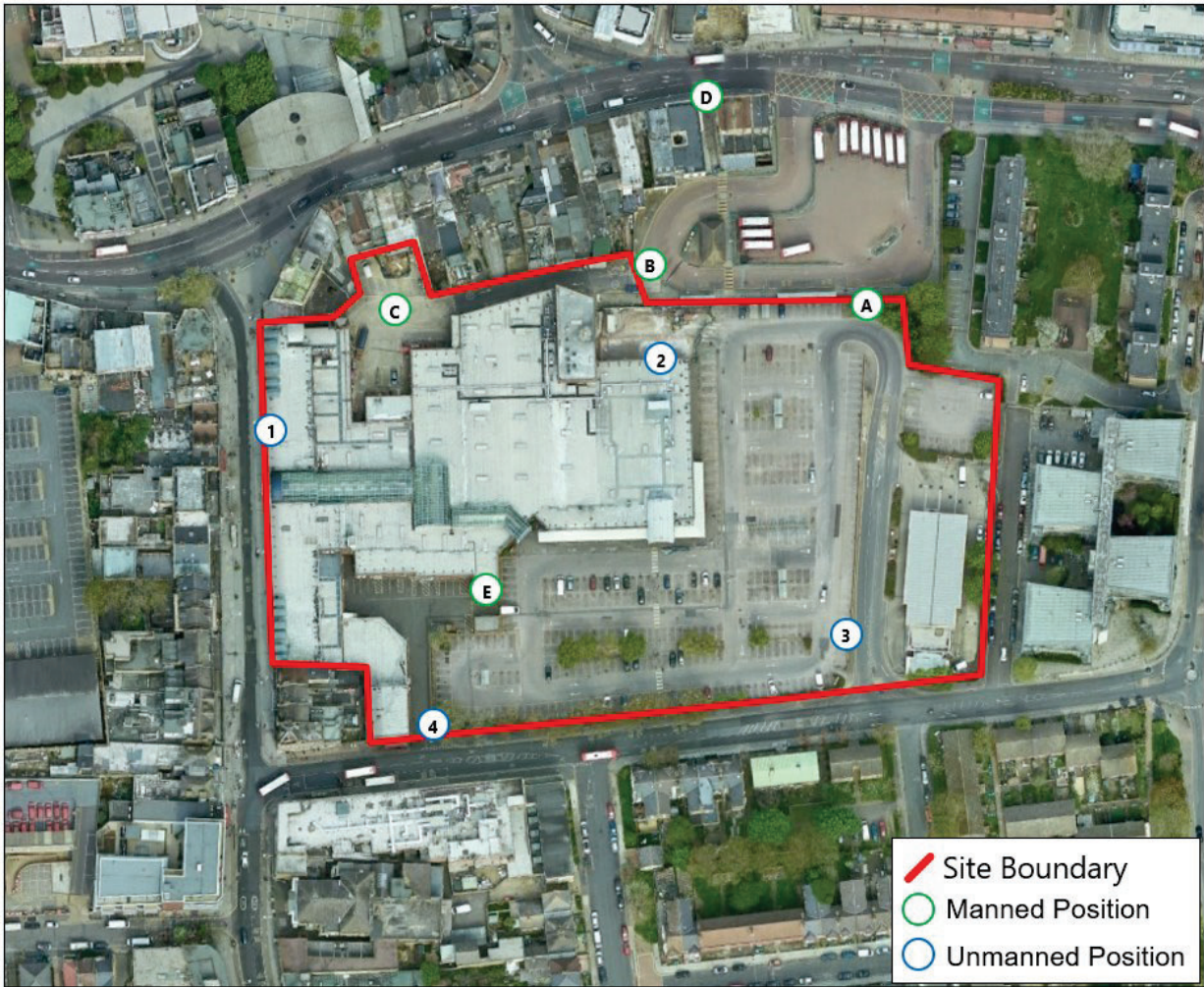
Baseline Conditions

- 1** The main source of noise at the site and its surrounding area is from road traffic on the local road network, including Hanover Park, Rye Lane and Peckham High Street, as well as buses manoeuvring within Peckham Bus Station.
- 2** The closest train lines to the site are London Overground and National Railway lines which pass approximately 200m south of the site. Noise and vibration from passing trains on these lines is not expected to affect the Proposed Development due to the distance between the site and the train lines, measured to be approximately 200m to the south.
- 3** Hann Tucker Associates undertook a baseline noise survey at the site in August 2022 at 4No, unmanned monitoring locations and 5No. manned positions. The measurement positions were carefully selected in order to ensure noise levels could be considered representative of those at surrounding noise sensitive receptors, as

well as providing sufficient data for various acoustic design assessments for the Proposed Development (including an assessment of the suitability of the site for residential use).

4 The monitoring locations are shown on Figure 1.

Figure 1. Noise Survey Monitoring Locations



5 The typical daytime $L_{Aeq}(16\text{-hour})$ and night time $L_{Aeq}(8\text{-hour})$ noise levels measured during the unmanned survey are presented in Table 1 below.

Table 1 Typical Daytime $L_{Aeq}(16\text{-hour})$ and Night Time $L_{Aeq}(8\text{-hour})$ Noise Levels (Unmanned)

Position	Measured $L_{Aeq,T}$ Noise Level (dB re 2×10^{-5} Pa)	
	Daytime (07:00 – 23:00) Hours, $L_{Aeq,16hr}$	Night-Time (23:00 – 07:00) Hours, $L_{Aeq,8hr}$
1	66	61
2	60	59
3	68	57

Position	Measured $L_{Aeq,T}$ Noise Level (dB re 2×10^{-5} Pa)	
	Daytime (07:00 – 23:00) Hours, $L_{Aeq,16hr}$	Night-Time (23:00 – 07:00) Hours, $L_{Aeq,8hr}$
4	65	60

6 The A-weighted (dBA) L_{90} , L_{eq} and L_{max} sound levels from the manned survey are presented in Table 2 below.

Table 2 A-Weighted (dBA) L_{90} , L_{eq} and L_{max} Sound Levels (Manned)

Position	Sound Levels dBA		
	L_{90}	L_{eq}	L_{max}
A	58	66	82
B	57	66	80
C	49	53	72
D	63	69	83
E	52	55	80

Future Baseline Conditions

7 In relation to traffic and transport and associated road traffic noise effects, a future baseline year, i.e. when the Proposed Development is expected to be operational, will be considered. Operational road traffic noise will be assessed by considering the change in traffic flows for the predicted future baseline year.

Receptors

8 The existing noise and vibration sensitive receptors which could be worst affected by the noise and vibration associated with the Proposed Development are indicated within Figure 2 and Table 3.

9 In addition to the above, the Proposed Development will also introduce residential (including associated amenity space) and commercial uses that will be considered as sensitive receptors when the Proposed Development is completed and operational (i.e. site suitability) that shall be located within the site boundary.

Figure 2. Existing and Proposed Sensitive Receptors

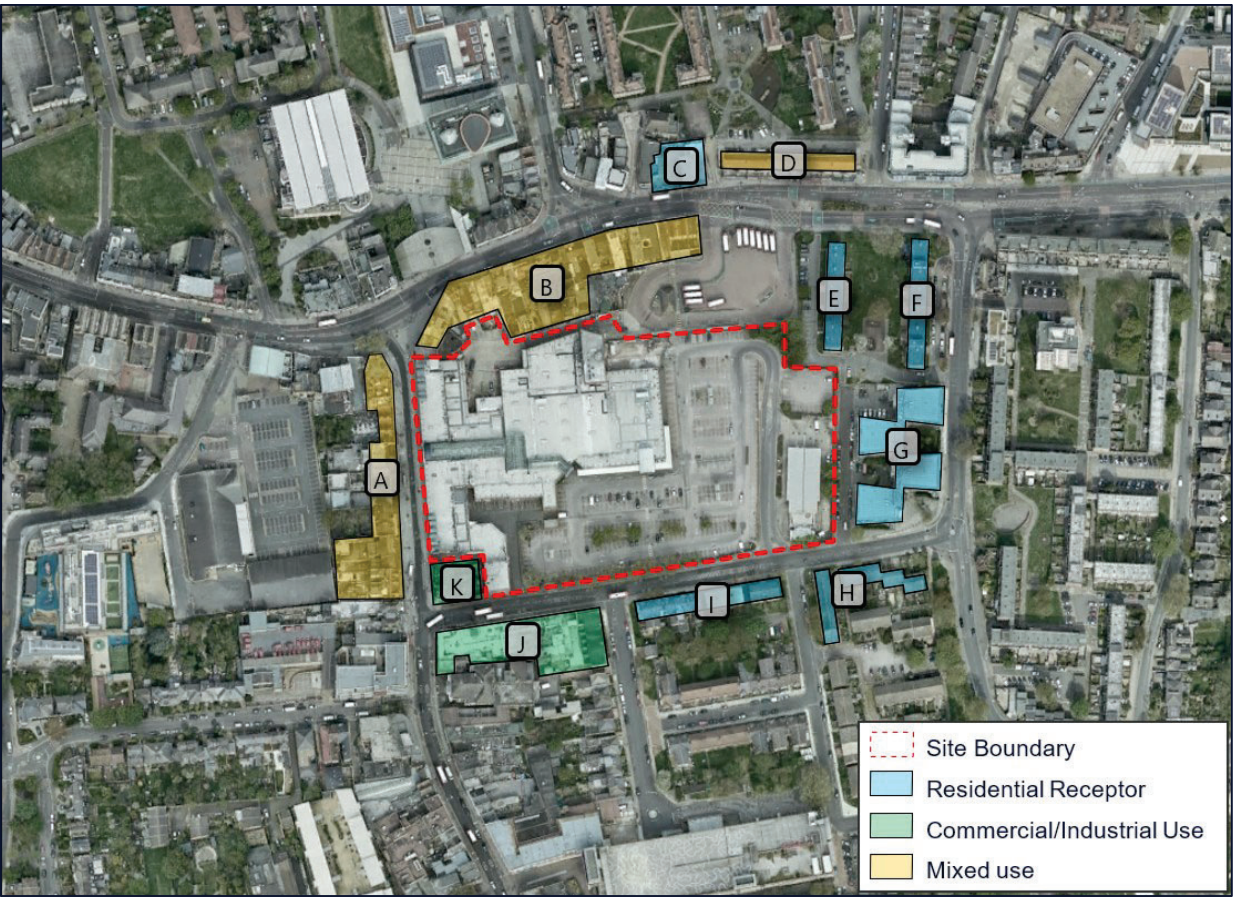


Table 3 Existing Sensitive Receptors

Ref	Type	Description
A	Mixed-use	Commercial units with residential properties above on Rye Lane
B	Commercial	Commercial units with residential properties above on Peckham High Street
C	Residential	Travelodge Hotel on Peckham High Street
D	Mixed-use	Commercial units with residential properties above on Peckham High Street
E	Residential	A block of residential apartments (Purdon House) on Clayton Road
F	Residential	A block of residential apartments (Flamborough House) on Clayton Road
G	Residential	A block of residential apartments (Hanover Park) on Hanover Park
H	Residential	Residential dwellings on Hanover Park and Cicely Road
I	Residential	Residential dwellings on Hanover Park
J	Commercial	A mixture of commercial properties on Hanover Park
K	Commercial	A single commercial property on Hanover Park and Rye Lane
L	Mixed-Use	Indicative location of the Proposed Development Phase 1 comprising residential and commercial uses

Assessment of Effects

- 10
- The likely significant noise and vibration effects to be considered within the ES are as follows:
- Temporary noise and vibration effects to existing (and proposed) sensitive receptors surrounding the site as a result of noise and vibration generated during demolition and construction of the Proposed Development. This shall include consideration for fixed and mobile plant within site and construction vehicle movements on surrounding local roads;

- Permanent noise and vibration effects to proposed sensitive receptors within the site as a result of noise and vibration generated from road traffic associated with the operation of the Proposed Development; and
- Permanent noise effects to existing and proposed sensitive receptors within and surrounding the site generated from building services plant forming a part of the completed and operational Proposed Development;
- Permanent noise effects to existing and proposed sensitive receptors within and surrounding the site generated from proposed commercial units forming a part of the completed and operational Proposed Development; and
- Assessment of site suitability of the Proposed Development for residential use.

Summary Assessment Methodology

- 11
- The methodology employed for the assessment of likely significant noise and vibration effects resulting from the Proposed Development, and to ensure the Proposed Development provides an acceptable noise environment to its future residents, will include the following:
- Establishment of the receptors within the vicinity of the Proposed Development that are and/or would be potentially sensitive to noise and vibration;
 - Establishment of baseline noise conditions undertaking a detailed noise monitoring survey;
 - Predict noise and vibration from assumed demolition and construction works associated with the Proposed Development upon existing and proposed noise sensitive receptors;
 - Identify and recommend appropriate mitigation and best practice measures to minimise noise and vibration levels anticipated to be generated by the demolition and construction of the Proposed Development;
 - Review of baseline and construction road traffic flow counts to obtain likely road traffic noise levels during construction periods for assessment purposes;
 - Review of baseline and likely future baseline road traffic flow counts against surveyed noise levels to obtain likely future baseline noise levels for assessment purposes;
 - Establishment of noise criteria for fixed plant associated with the completed and operational Proposed Development in line with LBS requirements;
 - Assessment of internal noise levels within the residential component of the completed and operational Proposed Development for site suitability with formulation of example appropriate design interventions and mitigation measures where appropriate; and,
 - Establishment of the likely residual noise and vibration effects of the Proposed Development.
- 12
- All relevant technical noise and vibration data and information used to inform the assessment will be appended to the ES.

Policy and Legislation

- 13
- The noise and vibration assessment will be conducted in accordance with the principles set out in the following policies and guidance:
- National Planning Policy Framework (NPPF), (2023)
 - The London Plan, March 2021
 - London Borough of Southwark – Technical Guidance for Noise, January 2017
 - Method for Rating and Assessing Industrial and Commercial Sound - BS 4142:2014+A1:2019
 - Noise and Vibration Control on Construction and Open Sites. Part 1, 2 & 4. Code of Practice – BS 5228:2009+A1:2014
 - Guidance on Sound Insulation and Noise Reduction in Buildings – BS 8233:2014

- Guide to Evaluation of Human Exposure to Vibration in buildings – BS 6472-1:2008
- Evaluation and Measurement for Vibration in Buildings – BS 7385 Part 1-2: 1990/93
- Control of Pollution Act, Chapter 40, Part III, 1974
- Calculation of Road Traffic Noise – 1988
- Design Manual for Roads and Bridges (DMRB) Volume 11 – 2011
- World Health Organization - Guidelines for Community Noise – 2000

Demolition and Construction

- 14 The temporary works, which will include the demolition of existing structures and construction of the Proposed Development, will give rise to increased environmental noise and vibration in the vicinity, with the potential to disturb the occupants of nearby receptors and introduced receptors.
- 15 On the basis of the above, it is proposed that the following potential noise and vibration construction impacts are scoped into the ES:
- Noise from demolition and construction activities (fixed and mobile plant equipment associated with the Proposed Development);
 - Vibration from demolition and construction activities (such as piling); and

Construction traffic noise through temporary changes in traffic levels. Completed Development

- 16 The completed and operational Proposed Development also has the potential to alter the existing noise environment due to changing road traffic conditions, building services plant, servicing and noise from commercial units, thereby potentially affecting occupants of surrounding land-uses.
- 17 On the basis of the above, it is proposed that the following noise impacts potentially caused by the Proposed Development once complete and occupied are scoped into the ES:
- Road traffic noise on surrounding roads through potential increase in local road traffic due to the Proposed Development and any surrounding cumulative schemes;
 - Noise from fixed building services plant;
 - Servicing noise; and
 - Noise generated by commercial units.

Non-Significant Effects to be Scoped Out of the ES

18

Vibration Associated with the Completed and Operational Proposed Development

- 19 There are no significant vibration generating sources on the site or in sufficient proximity to the site that give rise to noticeable incidences of existing vibration. Furthermore, no significant sources of vibration will be introduced by the completed and operational Proposed Development. Accordingly, the assessment of vibration in relation to the completed and operational Proposed Development will be scoped out of the ES.
- 20 The assessment of potential vibration impact from existing permanent environmental sources upon future residents of the Proposed Development is to be scoped out as no potential sources ground vibration have been identified within or nearby the Proposed Development site.

Site Suitability

- 21 The suitability of the site for residential development will be assessed in terms of noise and will be considered in line with local guidance and requirements and guidance contained in the NPPF. Details will be provided on

suitable glazing and ventilation strategies in order to achieve the indoor ambient noise levels recommended in BS 8233:2014 'Sound insulation and noise reduction for buildings'. Design criteria for external noise will be considered when assessing external garden and balcony areas. Consideration shall be made for the potential noise and vibration impacts upon each phase, if applicable, from the demolition and construction activities of the following development phase.

Cumulative Assessment

- 22 The cumulative impacts associated with the Proposed Development and other proposed schemes (i.e. cumulative schemes) within the locality will be established and assessed. This will be in relation to demolition and construction noise and vibration, traffic flow changes and building services noise.



TOPIC SHEET

PROJECT VULNERABILITY

Introduction

With reference to Regulation 4(4) and Schedule 4 of the EIA Regulations¹, this Topic Sheet considers whether there are likely to be any significant effects on the environment or the project arising from the vulnerability of the Proposed Development to major accidents or disasters. It is considered that significant effects relating to project vulnerability (major accidents and natural disasters) are unlikely and as such this topic is **SCOPED OUT** of the EIA. This Topic Sheet has been produced by Trium.

Paragraph 8 of Schedule 4 of the EIA Regulations provides a description of the information to be provided in the ES in relation to these events. In line with this description, this information is of key importance for the assessment of major industrial and / or infrastructure schemes which could pose significant risks to society and the environment in the event of a major accident or a natural disaster which would impede its normal function (e.g. nuclear / petrochemical installations, major transport infrastructure such as tunnels, bridges or airports, etc.). While the Proposed Development does not fall into these scheme categories, the project’s vulnerability to such events has nevertheless been taken into consideration in order to ascertain the potential risks to future site users and surrounding human and environmental receptors.

Guidance is available (*IEMA Major Accidents and Disasters in EIA: A Primer*²) which has clarified the definitions of major accidents and disasters to the following:

- Disaster – “may be a natural hazard (e.g., earthquake) or a man-made/external hazard (e.g., act of terrorism) with the potential to cause an event or situation that meets the definition of a major accident”; and
- Major accident – “events that threaten immediate or delayed serious environmental effects to human health, welfare and / or the environment and require the use of resources beyond those of the client or its appointed representatives to manage. Whilst malicious intent is not accidental, the outcome (e.g., train derailment) may be the same and therefore many mitigation measures will apply to both deliberate and accidental events”.

As noted in the guidance, a development should first be screened to determine its potential to result in likely significant effects from major accidents and natural disasters. The following questions are posed to help determine a view on this:

- “Is the development a source of hazard itself that could result in a major accident and/or disaster occurring?
- Does the development interact with any sources of external hazards that may make it vulnerable to a major accident and/or disaster?
- If an external major accident and/or disaster occurred, would the existence of the development increase the risk of a significant effect to an environmental receptor occurring?”

¹ His Majesty’s Stationery Office (HMSO) 2017. *The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (amended in 2018 and 2020)*

² IEMA, 2020, *Major Accidents and Disasters in EIA: A Primer*.

Discussion for Scoping Out

- 1 In line with the above questions, given its intended scale and uses, it is considered the Proposed Development would be unlikely to result in significant effects from most major accidents and natural disasters. The Proposed Development is not a source of hazard itself nor does it interact with any sources of external hazards that make it vulnerable to a major accident or disaster.
- 2 The Proposed Development intends to provide a mixed-use development, comprising a mix of residential and commercial uses (see Description of Development in main report). As such, considering the above definitions and considerations an assessment of the Proposed Development’s vulnerability to major accidents and natural disasters has been scoped out of further assessment in the EIA.
- 3 The guidance further states that:

“Not all potential events will fall into the scope of a major accidents and/or disasters assessment. The level of risk therefore needs to be defined to inform what types of events are within the scope of the major accidents and/or disasters assessment”.
- 4 The London Resilience Partnership has developed the London Risk Register, which lists a range of natural hazards and man-made accidents/ incidents and assesses the risks they pose to the London area based on their potential impact and likelihood. As well as assessing the risk of these events, the London Risk Register also provides an outline of the control measures already in place to avoid or manage and respond to them. These measures range from specific laws and regulations intended to avoid or manage the potential causes of major accidents and natural disasters, to government agency programmes intended to prevent inspect and monitor these causes, as well as a variety of response plans, forecasting and early warning systems. The effective implementation of these plans, programmes, legislative tools and guidance is considered to reduce the risk of these events to a level which is as low as reasonably possible.
- 5 Due to the nature and surroundings of the Proposed Development, many of the events listed in the Register (e.g. wildfires, animal diseases etc.) are not considered relevant or likely to pose a risk to future site users or surrounding receptors. The remaining events in the Register will be managed, or altogether avoided, through the aforementioned established regulatory framework and the control measures implemented at the local and / or national government level, with support of specialist agencies.
- 6 In some cases, this risk management process will be further supported with project-specific information and assessments which form part of the EIA and the wider planning process. This includes the requirement for a Flood Risk Assessment for example which will address the flood related risks and which will be submitted in support of the planning application. Additionally, consideration of potential traffic and transport impacts (such as the potential for increased vehicle movements to / from the site) will be assessed within the traffic and transport assessment within the ES.

Conclusion

- 7 In line with the above, it is considered that the vulnerability of the Proposed Development to major accidents and natural disasters will be adequately managed throughout the lifetime of the project. As such, it is considered that the vulnerability of the Proposed Development to such events, is in itself, unlikely to result in any significant effects on introduced site users and surrounding environmental and human receptors. Therefore, the issue of major accidents and natural disasters is scoped out of the EIA.

TOPIC SHEET

SOCIO-ECONOMICS

Introduction

It is considered that there is the potential for likely significant effects relating to socio-economics and so this topic shall be **SCOPED IN** to the EIA. The Socio-Economic assessment and ES Chapter will be undertaken by Quod.

The ES socio-economic assessment shall:

- Define the socio-economic baseline conditions;
- Identify relevant socio-economic receptors;
- Assess:
 - a. the potential for socio-economic effects as a result of the demolition and construction phase and as a result of the completed development and resultant socio-economic effects;
 - b. the likely significant socio-economic effects;
 - c. any required mitigation or monitoring to address adverse socio-economic effects; and
 - d. the potential for cumulative socio-economic effects.

The socio-economic assessment will assess the likely effect of the Proposed Development on the baseline economic and social conditions within the local and wider area. The Proposed Development is expected to generate socio-economic impacts arising predominantly from the new residential population brought to the site and through employment opportunities created during construction and operation of the completed development.

Baseline Conditions

Current Baseline Conditions

- 1 The site is currently occupied by the Aylesham Shopping Centre, a petrol station and car park. The Aylesham Shopping Centre accommodates a mix of retail uses including a large Morrisons supermarket.
- 2 A baseline assessment will be undertaken as part of the socio-economic ES Chapter to establish the existing socio-economic conditions of the site and the surrounding area.
- 3 The baseline assessment will consider the level of existing employment on site. If the actual level of employment is not known to the Applicant, the assessment will estimate the potential employment capacity by applying standard job density ratios from the Homes and Communities Agency Guidance (2015)¹ to the existing floorspace. This may be supplemented by site specific information provided by the land owner. Where a range is possible, the assessment will be based on a reasonable worst case assessment.

¹ Homes and Communities Agency (HCA), 2015. *Employment Density Guide*, 3rd Edition.

- 4 Demographic, housing and economic baseline data for the Local Area (defined as Rye Lane ward and Peckham ward²) will also be put in context against the London Borough of Southwark (LBS) and London profile.
- 5 The assessment of existing education provision (primary and secondary schools) will be based on LBS School Place Planning spatial areas:
 - Primary schools from Reception to Year 6 – Planning Area 3: Peckham & Nunhead³; and,
 - Secondary schools from Year 7 to 11 – Borough Level⁴.
- 6 The assessment of existing health provision and open space will be based on existing provision within reasonable travel times of the site:
 - 1km for primary healthcare services (GPs)⁵; and,
 - 800m for open space and play space⁶.
- 7 The socio-economic baseline will utilise data from sources including (but not limited to):
 - Census⁷ (2021);
 - Business Register and Employment Survey (2022)⁸;
 - Claimant Count (2023)⁹;
 - Housing delivery data from London Plan Annual Monitoring Reports;
 - Index of Multiple Deprivation (2019)¹⁰;
 - Annual School Census Data (2023)¹¹ and information from LBS school admission documents;
 - Data on healthcare services from the NHS Digital (2023)¹²; and,
 - Open space and playspace information from Ordnance Survey data¹³, alongside a desktop study.
- 8 Where more up to date data is available at the time of the assessment than is stated here, this will be utilised.

Future Baseline Conditions

- 9 The future baseline will consider additional social infrastructure expected to be delivered when the Proposed Development is anticipated to be fully complete and operational.

Receptors

- 10 The following existing receptors are considered sensitive to potential socio-economic impacts arising from the Proposed Development:
 - Existing businesses and employees on site;
 - The construction industry and its employees;
 - The local economy and labour market i.e. local businesses and economically active residents;

² The site is in Rye Lane ward, however it is adjacent to Peckham ward, therefore both wards will be considered as the Local Area.

³ LBS has five primary planning areas; the Site falls within Planning Area 3, therefore the assessment will consider existing primary schools within this area.

⁴ Older children tend to travel further to secondary school – secondary school planning tends to therefore be carried out at the borough level.

⁵ Based on 10-15 mins walking time (TfL 2016).

⁶ This is in line with the Greater London Authority. (2012). *Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance*.

⁷ Office for National Statistics (2021). *Census*.

⁸ Office for National Statistics (2022). *Business Register and Employment Survey*.

⁹ Office for National Statistics (2023). *Claimant Count*.

¹⁰ Ministry of Housing, Communities and Local Government (2019). *Indices of Multiple Deprivation*.

¹¹ Department for Education (2023) *Schools, Pupils and their Characteristics. (Annual School Census Data, 2023)*.

¹² National Health Service (2023) *NHS Digital – Workforce Data Report*.

¹³ Ordnance Survey, Live Data Source. OS Open Greenspace.

- The local housing market (housing need within the borough);
- Local social infrastructure and its users, specifically:
 - Primary schools within Planning Area 3: Peckham & Nunhead;
 - Secondary schools across the borough;
 - GP surgeries within 1km of the site;
 - Open space and playspace within 800m of the site.

- 11 The Proposed Development will also introduce new residents to the site which may be sensitive to socio-economic impacts.

Assessment of Effects

- 12 Based on the sensitive receptors outlined above, the Proposed Development is expected to generate a range of socio-economic effects during the demolition and construction and once operational. The scope of the socio-economic assessment will include:
- Displacement and loss of existing uses and associated jobs;
 - Generation of temporary employment during the demolition and construction period;
 - Net effect on employment opportunities once the Proposed Development is completed and occupied;
 - Delivery of new homes;
 - Spending by residents and employees;
 - The effect of the population accommodated by these new homes on social infrastructure, specifically schools, primary healthcare, open space and playspace.
- 13 The following potential socio-economic effects are not likely to be significant and as such are scoped out of this assessment.
- **Indirect construction effects** - such as supply chain effects and spending by construction workers are not likely to be significant within the assessment areas. The number of construction workers would fluctuate on-site over the course of the construction programme, as such spending would also fluctuate over time and this would not be significant within the assessment areas. It is also not possible to quantify supply chain and procurement effects as the level of information required will not be available at the planning application stage. The spatial context of supply chain effects can range from local to national and even international depending on the supply and sourcing of construction materials. Whilst these effects are likely to be beneficial, they are unlikely to be significant.
 - **Dentists, Nurseries, Leisure and other Community Facilities** - it is not appropriate to undertake a quantitative assessment of the Proposed Development's impact on the capacity of dentists, nurseries, leisure and other community facilities in the same way as for schools and primary healthcare. Use of these facilities varies amongst the population, and is more spatially diffuse compared to schools and primary healthcare facilities which have a closer link to where people live. Local Authorities have a statutory duty to ensure there is sufficient provision of some of these services for their residents, but provision is most often met by the private or charitable sector. The effect of the Proposed Development (due to its scale and location) on these types of facilities is not expected to be significant.
 - **Crime** - it is suggested that potential effect upon crime is scoped out of this assessment. It is not possible to accurately assess the impact of a development of this scale and type on crime. Effects are likely to be multi-directional with a greater residential population (meaning more opportunities for crime), but also development can offer better design, permeability and passive surveillance of areas, potentially resulting in net beneficial effects that are not likely to be significant.

Policy and Legislation

- 14 The policies of relevance to the assessment of socio-economic effects include:
- Southwark Plan (2022):
 - Policy SP1 'Homes for all'
 - Policy P15 'Residential Design'

- Site Allocation NSP74: Aylesham Centre and Peckham Bus Station
- London Plan (2021):
 - Policy H4 'Increasing housing supply'
 - Policy S4 'Play and informal recreation'

Demolition and Construction

- 15 The assessment of potential likely significant socio-economic effects during demolition and construction will be undertaken using the following methodology and/ or tools:
- Displacement or loss of existing on-site employment will be considered in the context of the level of existing employment on-site. The impact of displacement of the existing Morrisons store will also be considered on a qualitative basis, taking into consideration the phasing of the development and any temporary measures proposed;
 - Demolition and construction-related employment effects will be assessed using the Construction Industry Training Board (CITB) Labour Forecasting Tool¹⁴.

Phasing

- 16 No quantitative assessment of phasing will be undertaken.

Completed Development

- 17 The assessment of potential likely significant socio-economic effects once the Proposed Development is complete and operational will be undertaken using the following methodology and/ or tools:
- Direct operational employment effects will be assessed by applying standard job density ratios from the Homes and Communities Agency Guidance (2015)¹⁵. The assessment will also consider the net employment effect over the baseline position on the site;
 - Delivery of housing will be assessed against policy targets for the borough;
 - The estimated resident population (including child yield) arising from the Proposed Development will be calculated using GLA's Population Yield Calculator¹⁶. This model estimates population based on Public Transport Accessibility Level (PTAL) and geographic aggregation. The site has a PTAL of 6a-6b, therefore, to model the Proposed Development a PTAL of 5-6 and geographic aggregation of Inner London will be applied;
 - Demand for education will be assessed by considering the primary and secondary age yield against existing capacity in schools surrounding the site. The age brackets of the GLA's Population Yield Calculator will be amended so that the output age profiles align with primary (5-11 years) and secondary (12-16 years) age groups;
 - The Healthy Urban Development Unit (HUDU) benchmark of 1,800 registered patients per NHS General Practitioner (GP)¹⁷ and the regional and national average benchmark provision will be used to assess existing GP capacity against demand arising from the Proposed Development;
 - Demand for and provision of playspace will be assessed in line with the GLA's SPG on Play and Informal Recreation (2012) standards¹⁸ and in accordance with The Southwark Plan (2022) Policy P15 'Residential Design';
 - Demand for and provision of outdoor amenity space will be assessed in line with the standards set out in The Southwark Plan (2022) Policy P15 'Residential Design'; and,

¹⁴ Construction Industry Training Board (2023) Labour Forecasting Tool

¹⁵ Homes and Communities Agency (2015). Employment Density Guide.

¹⁶ Greater London Authority (2019). Population Yield Calculator (v.3.2).

¹⁷ Healthy Urban Development Unit (2019). HUDU Planning Contributions Model 2017: Guidance Notes, Page 20.

¹⁸ Greater London Authority. (2012). Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance.

- An estimate of spending generated as a result the completed Proposed Development would be calculated using average household spending figures¹⁹ and an average figure for daily worker spending²⁰.

Cumulative Assessment

- 18 The socio-economic assessment will also include a cumulative assessment, considering the likely socio-economic effects arising from the Proposed Development in conjunction with other cumulative schemes.

TOPIC SHEET

HERITAGE, TOWNSCAPE AND VISUAL IMPACT

Introduction

It is considered that there is the potential for likely significant effects relating to Townscape, Visual Impact and Heritage and so these topics shall be SCOPED IN to the EIA. A Heritage, Townscape and Visual Impact Assessment (HTVIA) will be undertaken by the Townscape Consultancy with Accurate Visual Representations (AVRs) – sometimes known as ‘verified views’ - produced by Miller Hare.

The ES HTVIA shall:

- Define the Heritage, Townscape and Visual baseline conditions;
- Identify relevant Heritage, Townscape and Visual receptors;
- Assess:
 - a. the potential for Heritage, Townscape and Visual Impacts throughout the demolition and construction works and as a result of the completed development and resultant Heritage, Townscape and Visual effects;
 - b. the likely significant Heritage, Townscape and Visual effects;
 - c. any required mitigation or monitoring to address any likely significant adverse Heritage, Townscape and Visual effects;
 - d. the potential for cumulative Heritage, Townscape and Visual effects.

Heritage, Townscape and Visual Impact will be dealt with as one Volume, but assessed under different methodologies:

- Under methodology 1: Built Heritage Assessment;
- Under methodology 2: Townscape and Visual Impact Assessment.

Baseline Conditions

Current Baseline Conditions

- 1 The site is bounded by Peckham High Street and the backs of buildings on that street to the north; McKerrell Road and an access road and parking for an apartment block, Purdon House, to the east; Hanover Park to the south; and Rye Lane to the west. Parts of the site along Rye Lane fall within the Rye Lane Conservation Area. The Site lies within the London Borough of Southwark (LBS) viewing corridor, View 1: The London Panorama of St Paul's Cathedral from One Tree Hill.
- 2 The site is irregular in shape. It is largely occupied by the Aylesham Shopping Centre, a late 20th century brick shopping centre and associated car park. The shopping centre frontage to Rye Lane is generally two storeys in height, with barrel-shaped attic elements extending higher at the northern and southern ends of the frontage. A series of ground floor retail units, typically extensively glazed with plastic or metal fascias, are located along the Rye Lane frontage. The facades above are in red brick, with semi-circular windows framed in buff brick, which

¹⁹ Office for National Statistics (2023). Household Expenditure Survey 2020-2022.
²⁰ Visa Europe (2014). UK Working Day Spending Report – adjusted to reflect inflation.



is also used for string courses. The barrel elements are edged in buff brick and have porthole openings, also framed in buff brick, and faux-balconies in blue metal.

- 3 An arched entrance to a glazed arcade is located in the middle of the frontage. The arcade runs through the shopping centre, in a broadly east-west direction, connecting Rye Lane with a large supermarket located in the centre of the site, and a car park surrounding it to the south and east.
- 4 The supermarket is built in a similar style to the rest of the shopping centre. A service yard and access route separate the northern edge of the supermarket and shopping centre from the backs of terraced properties to the north, along Peckham High Street.
- 5 The site does not include any designated or non-designated above ground built heritage assets (HAs). The closest listed building to the site is the grade II listed building at no. 58 Peckham High Street to the west and grade II listed Baptist Chapel to the south. LBS is currently consulting on their new local list which is expected to be adopted in 2024. Peckham's Townscape Heritage Initiative (THI) buildings are also included within the study. Though not all within the draft local list, these buildings are regarded to have some level of architectural and/or historic interest and will therefore be treated with the same level of significance as those on LBS's draft local list.
- 6 The site can be considered to belong to a wider urban block (which it largely occupies), defined by Peckham High Street, Rye Lane, Hanover Park and McKerrell Road. The south-west corner of the site's urban block is occupied by relatively ornate red-brick buildings at 47-49 Rye Lane, which rise up to five storeys including a mansard storey on the corner. The northern edge of the urban block along Peckham High Street is occupied by a varied set of buildings, from one to four storeys in height, in a range of styles and of various ages. The former Higgins and Jones department store building, on the north west corner of the urban block at the junction of Peckham High Street and Rye Lane, is of particular note; its clock tower is a local landmark, albeit one much altered from its original appearance. A petrol station lies east of the car park on site, and a bus layover area lies to the north-east of the supermarket on site. A row of THI buildings, 86, 88 and 102 Peckham High Street, bounds the north of the site.
- 7 Two post-war residential slab blocks are located to the east of the bus layover, occupying the north-east corner of the site's urban block, outside of the site boundary. These apartment blocks are set perpendicular to Peckham High Street, and are surrounded by open space. The western block, Purdon House, is six storeys tall and the eastern block, Flamborough House, is five storeys tall.
- 8 A residential development built in relatively recent years lies to the south, and on the south east corner of the Site's urban block. This takes the form of four blocks, two each set to either side of a central circulation block aligned north-south. The blocks range between four and six storeys in height.
- 9 Beyond the site's urban block, the character of the local area is varied, with different types of development often located in close proximity to each other. Along Rye Lane, opposite the site and further south along it, the buildings generally take the form of three storey terraced properties with ground floor retail units. The same is true to a large extent of Peckham High Street, particularly west of the site, and to some extent on its northern side opposite the site.
- 10 A major exception to this is the area occupied by Peckham Square, a hard landscaped urban space, and the Peckham Library and Peckham Pulse buildings set on either side of the square. This area is located north of terraced development along Peckham High Street, accessed through a large arch from the High Street which sits opposite the north west corner of the site and its urban block. Peckham Library is clad in pre-patinated copper and has a distinctive form, with upper levels overhanging the ground level entrance, and connected to ground level by angled pilotis.
- 11 The area to the south of the site is occupied by mainly two-three storey residential development, of 19th century and post-war origin. To the east of the Site's urban block, an extensive post-war estate mainly comprising residential blocks of two-five storeys in height dominates the area between Clayton Road and Consort Road. A 20 storey tower, Witcombe Point, is also located within this estate.
- 12 The wider area around the site is, save for the retail centre along Rye Lane, predominantly residential in nature with a mixture of historic terraced development, post-war estates and housing built in recent decades.

- 13 Peckham Rye train and London Overground Station lies approximately 250m south of the site, and Queen's Road Peckham train and London Overground Station lies approximately 600m east. Peckham High Street is part of a major east-west route in this part of London, ultimately connecting Blackheath in the east with Vauxhall in the west.
- 14 The largest green spaces in the wider area, Peckham Rye and Nunhead Cemetery, lie approximately 800m south and 1.3km south-east of the site respectively.

Future Baseline Conditions

- 15 Consideration of the evolution of the baseline should the Proposed Development not come forward will be formed of a qualitative assessment made on the basis of professional judgement.

Receptors

Built Heritage

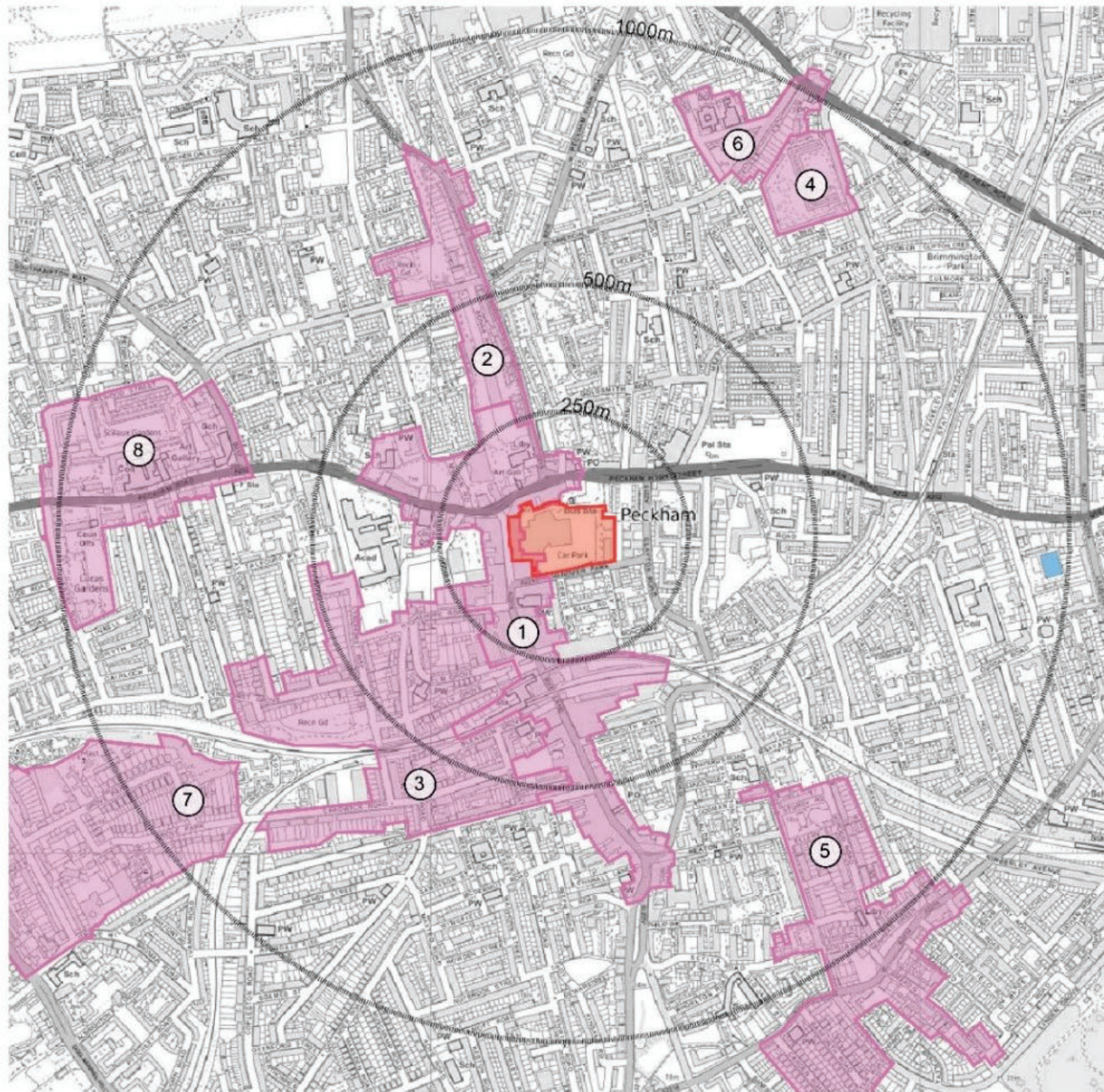
- 16 For Built Heritage effects, all HAs within a 500m radius of the site have been identified as heritage receptors, along with all conservation areas within 1km radius of the site. Non-designated HAs within a 250m radius of the site have been identified as receptors. Identification of heritage receptors involved a desktop survey to identify any relevant HAs on the site and in the area around it. Designated HAs within 500m of the site's centre point were included for initial consideration, and any locally identified buildings within 250m, this includes buildings on the draft LBS Local List or included within LBS THI). The extent of the baseline was then informed by knowledge of the site and the surrounding area and further desktop research. Due to the proposed height and scale of the scheme, consideration was then given to assets out of this radius. Conservation areas and grade II* listed buildings within a 1km radius were then added to the study area (there are no grade I listed buildings within 1km of the site). HAs are shown in **Figure 1** and **Figure 2**.

Townscape and Visual Impact

- 17 For Townscape and Visual effects, a selection of 37 views have been identified for assessment. These viewpoints are shown on the map at **Figure 3**. The views were based on a previously unsubmitted application of a similar height and scale for the site, for which these views were agreed with LBS, with additional views included following consultation with officers during pre-application meetings. Townscape receptors are shown out in Figure 4.



Figure 1. Map of Heritage Assets (Conservation Areas)



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Approximate Site boundary marked in red for indicative purposes only. Approximate 1000m, 500m and 250m radii are marked on the map. Conservation areas and Grade I & II* listed buildings are identified within the 1000m radius.

Conservation areas are identified below.

Conservation areas:

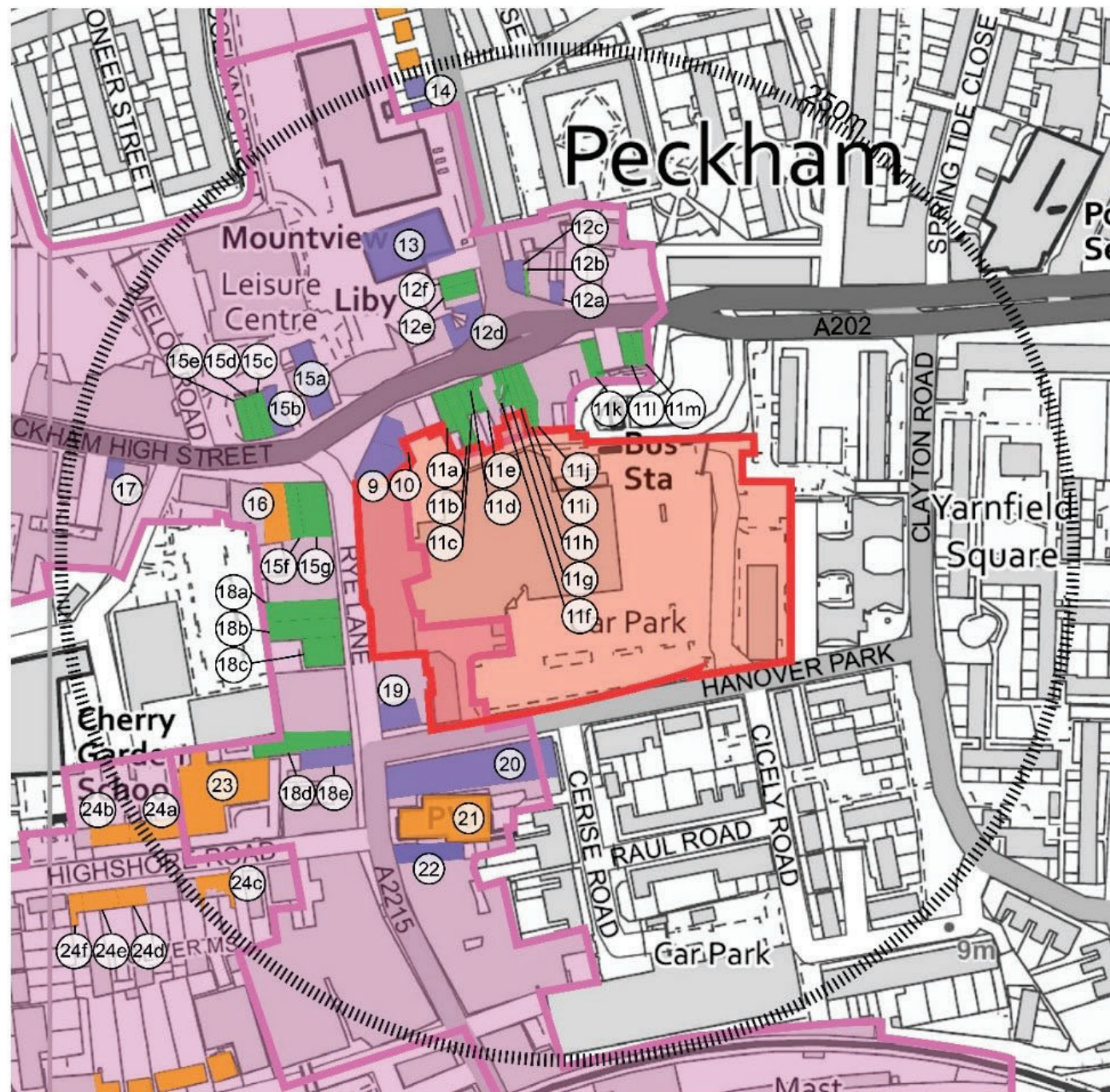
- ① Rye Lane Peckham Conservation Area
- ② Peckham Hill Street Conservation Area
- ③ Holly Grove Conservation Area
- ④ Caroline Gardens Conservation Area
- ⑤ Nunhead Green Conservation Area
- ⑥ Kentish Drovers and Bird in Bush Conservation Area
- ⑦ Camberwell Grove Conservation Area
- ⑧ Sceaux Gardens Conservation Area

Listed buildings:

- Grade II* listed building



Figure 2. Map of Heritage Assets (All other Heritage Assets)



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Approximate Site boundary marked in red for indicative purposes only. An approximate 250m radius are marked on the map. All heritage assets and Townscape Heritage Initiative buildings within the 250m radius are identified.

Listed buildings:

- Grade II* listed building
- Grade II listed building
- Draft Locally listed building (2018)

Townscape Heritage Initiative buildings:

- Mixed Priority

- | | |
|---|-----------------------------------|
| (9) The former Jones & Higgins Department Store | (13) Peckham Library |
| (10) 72-74 Peckham High Street | (14) 110-114 Peckham Hill Street |
| (11a) 86 Peckham High Street | (15a) 71-77 Peckham High Street |
| (11b) 88 Peckham High Street | (15b) 65, 67 Peckham High Street |
| (11c) 90 Peckham High Street | (15c) 63 Peckham High Street |
| (11d) 92 Peckham High Street | (15d) 61 Peckham High Street |
| (11e) 94 Peckham High Street | (15e) 59 Peckham High Street |
| (11f) 98 Peckham High Street | (15f) 62 Peckham High Street |
| (11g) 100 Peckham High Street | (15g) Central Buildings, Rye Lane |
| (11h) 102 Peckham High Street | (16) 58 Peckham High Street |
| (11i) 104 Peckham High Street | (17) 32 Peckham High Street |
| (11j) 106 Peckham High Street | (18a) 12 Rye Lane |
| (11k) 116 Peckham High Street | (18b) 14, 16 Rye Lane |
| (11l) 118-120 Peckham High Street | (18c) 18, 18a & 18b Rye Lane |
| (11m) 122 Peckham High Street | (18d) 26 Rye Lane |
| (12a) 119 Peckham High Street | (18e) 28 Rye Lane |
| (12b) 111 Peckham High Street | (19) 47, 49 Rye Lane |
| (12c) 109 Peckham High Street | (20) 51-57 Rye Lane (odd) |
| (12d) 97-107 Peckham High Street | (21) Baptist Chapel, Rye Lane |
| (12e) 128 Peckham Hill Street | (22) 61-63 Rye Lane |
| (12f) 126 Peckham Hill Street | (23) Post Office Depot |
| | (24a) 8-14 Highshore Road |
| | (24b) 16 and 18 Highshore Road |
| | (24c) 7, 9 and 11 Highshore Road |
| | (24d) 17 and 19 Highshore Road |
| | (24e) 21 and 23 Highshore Road |
| | (24f) 25 Highshore Road |

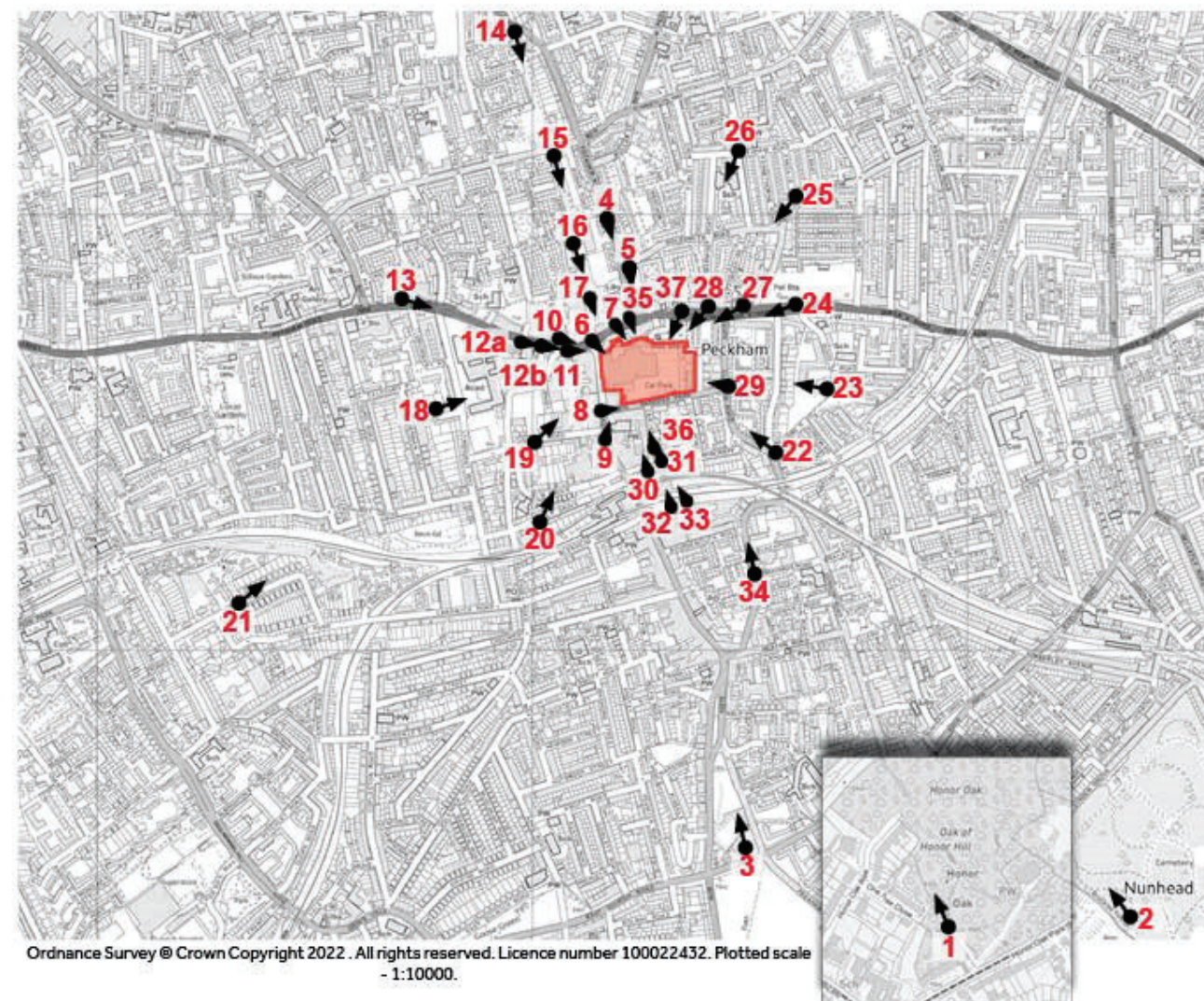


Figure 3. Map of Viewpoint Locations

TTC view no.	Location	Render / Wireline
1	One Tree Hill, Honor Oak Park (LBS view)	W
2	Nunhead Cemetery (LBS view)	W
3	Peckham Rye Park	W
4	Peckham Hill Street	R
5	Peckham Hill Street, opposite Mountview Academy	R
6	Peckham High Street, opposite Rye Lane junction	R
7	Peckham High Street	W
8	Junction of Hanover Park	R
9	Rye Lane/ Highshore Road	R
10	Peckham Road (north side of road)	R
11	Peckham Road (south side of road)	R
12a	Peckham Road (south side, west of 12a)	W
12b	Peckham Road (south side, west of 11)	R
13	Peckham Road (north side, west of 10)	R
14	Surrey Canal Walk, northern end	W
15	Surrey Canal Walk, Commercial Way	W
16	Surrey Canal Walk, near Lisford Street	W
17	Peckham Square	R
18	Lyndhurst Square	W
19	Highshore Road	W
20	Holly Grove	W
21	Grove Park	W
22	Consort Road	W
23	Cossal Park	W
24	Queen's Road, opposite Wood's Road	W
25	Meeting House Lane, Kincaid Road	W
26	Friary Road/ Fenham Road	W
27	Peckham High Street, outside Police Station	R
28	Peckham High Street, junction with Marmot Street	R
29	Clayton Road, looking along Hanover Park	R
30	Peckham Levels - viewing platform	R
31	Peckham Levels - centre	R
32	Bussey building - west	R
33	Bussey building - east	R
34	Copeland Road/ Brayards Road	W
35	Peckham Hill Street, outside M.Manze	W
36	Cerise Road	R
37	Peckham High Street (north side, north of 135)	R

Notes:

Viewpoint locations are approximate - exact locations, taking into account conditions on the ground, to be determined on site with TTC.
Approximate site boundary marked in red for indicative purposes only.

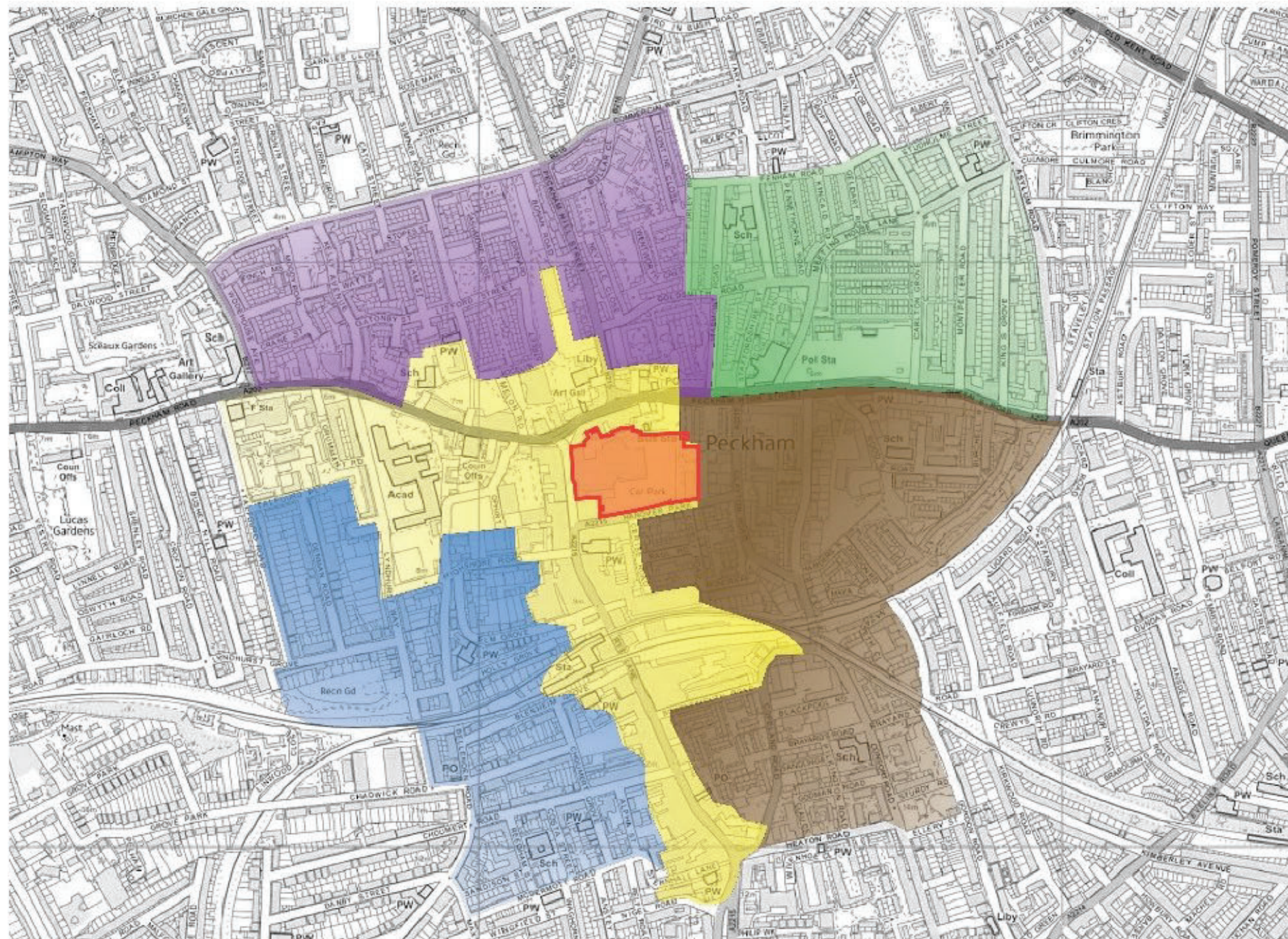


Aylesham Centre, Peckham
Viewpoint map for Townscape and Visual Impact Assessment

Revision no: 2
Date: February, 2023



Figure 4. Townscape Character Area Map



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Notes:

Approximate Site boundary marked in red for indicative purposes only.

Townscape Character Areas:

-  TCA A: Central Peckham, retail, civic and leisure
-  TCA B: Historic residential Peckham
-  TCA C: Central Peckham housing, east of Site
-  TCA D: Central Peckham housing, north of Site
-  TCA E: Terraced streets, north of Queen's Road



Assessment of Effects

Policy and Legislation

- 18 Key policy and legislation relevant to the assessment includes, but is not limited to, the following:
- The Planning (Listed Buildings and Conservation Areas) Act 1990;
 - Section 16 of National Planning Policy Framework (NPPF);
 - National Planning Practice Guidance and National Design Guide;
 - Local (LBS) planning policy and guidance;
 - Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017); and
 - Historic England guidance: Conservation Area Appraisal, Designation and Management (2019).

Demolition and Construction

- 19 The provision of a new building as part of the Proposed Development would have the potential to alter the existing townscape character and quality of the site and the surrounding townscape study area. Views in the local and wider area would also potentially be altered as a result of the Proposed Development. As such, the HTVIA will address the following potential impacts and likely effects, and will identify those effects which would be significant or not significant.
- 20 Temporary change in townscape character, visual effects and the setting of HAs during demolition and construction works;
- Changes to the character, context and quality of the site and the local townscape;
 - Changes to selected views; and
 - Effects on the setting of nearby HAs.

Phasing

- 21 The Proposed Development will be delivered across several phases. The assessment of the effects on heritage, townscape and visual impact will be based on the complete and operational development as this will likely represent the 'worst-case' scenario. However, a short qualitative assessment on the effects during the phases of construction will be provided to understand how temporary changes in the townscape character, views and the setting of HAs could result in the potential for likely significant effects.

Completed Development

Part 1: Built Heritage Assessment

Heritage Approach

- 22 The western frontage of the site lies within the Rye Lane Peckham Conservation Area. The site does not contain or lie within any other above ground heritage assets. All above-ground designated heritage assets within a 500 radius of the site will be assessed (a map of these heritage assets is provided at Figure 2).
- 23 Non-designated heritage assets for the purposes of the assessment are considered to be locally listed buildings identified by the local authority. There are no locally listed buildings on the site. All locally listed buildings within a 250m radius of the site will be assessed.
- 24 An assessment will be made of the significance of the identified heritage assets in their existing states (cross-referencing the TVIA baseline, see above). This will be based on study of the historical development of the area with reference to relevant publications, and study of the present-day condition of the area based on site visits, study of maps and aerial photographs, and relevant publications. These assessments will be proportionate to



the significance of the assets and the likely effect of the Proposed Development on them. In line with paragraph 189 of the NPPF they will be sufficient to understand the potential impact of the proposal on their significance.

Methodology for Assessment

- 25 The assessment of the effect of the Proposed Development on a receptor (a heritage asset, as identified above for the purposes of this assessment) is made on the basis of professional judgement which takes into account relevant planning policies and guidance.
- 26 The sensitivity to change of each heritage asset or groups of assets is considered in relation to impacts (taking into account both direct and indirect effects). This is based on the designation and grade of the heritage asset and an assessment of its heritage significance (in light of NPPF policy), i.e. what elements of its fabric / constituent parts and setting contribute to its heritage significance (at the designated grade/level). It will be assessed as high, medium or low.
- 27 The likely scale of effects is derived through consideration of the magnitude of impact and the sensitivity to change of the heritage assets. This assessment takes into account the heritage significance of the particular heritage asset and how the Proposed Development will impact on this. Effects that are negligible or minor in scale are considered 'not significant'. Effects that are moderate or major in scale are judged to be 'significant'.
- 28 Effects are also assessed qualitatively as beneficial, adverse, or neutral in respect of their effect on the heritage significance of the heritage asset. This is in recognition of the fact that an effect on a heritage asset or its setting can enhance its heritage significance (a beneficial effect), harm its heritage significance (an adverse effect) or leave its heritage significance unchanged (a neutral effect). This consideration is independent of whether it is a major, moderate, minor or negligible effect. This assessment takes into account the nature and condition of the heritage asset, its setting as found today and how these contribute to its heritage significance.

Part 2: Townscape and Visual Impact Assessment

Townscape Approach

- 29 The townscape character areas to be covered will be identified in line with the approach set out below.
- 30 An assessment will be made of the site and its surroundings townscape in their existing state. This will be based on study of the historical development of the area with reference to relevant publications, and study of the present-day condition of the area based on site visits, study of maps and aerial photographs, and relevant publications.
- 31 This analysis will inform the division of the study area into townscape character areas i.e. geographical areas which have readily identifiable characteristics in common. The impact of the Proposed Development on these townscape character areas will then be assessed, based on conclusions drawn from the views analysis.

Views Approach

- 32 The proposed viewpoints have been identified in light of the methodology set out below, and are based on the previously unsubmitted application for the site.
- 33 The study area for the visual assessment is centred on the site and limited to locations from which the site can be seen, or from which new buildings on the site have the potential to result in a significant visual impact at the height proposed.
- 34 Four principal types of viewing location are identified:
- Views that have been identified as significant, by the LBS or others, e.g. in relevant planning policy and guidance documents (including the London Plan LVMF) and conservation area appraisals;
 - Other locations or views of particular sensitivity, including those viewpoints in which the Proposed Development may significantly affect the settings of World Heritage Sites, listed buildings and conservation areas;



- Representative townscape locations from which the Proposed Development will be visible; and
- Locations where there is extensive open space between the viewer and the Proposed Development so that it will be prominent rather than obscured by foreground buildings.

35 The set of viewpoints is chosen so that it covers:

- The range of points of the compass from which the Proposed Development will be visible;
- A range of distances from the site; and
- Different types of townscape area.

36 Possible locations in these categories within the study area are identified based on an examination of maps and aerial photographs; maps of conservation areas; and maps and lists of listed buildings. The study area and the possible locations are then visited to establish candidate viewpoints.

37 A list and map of proposed views is provided at Figure 1.

Methodology for Assessment

38 The methodology for the townscape and visual impact assessment is based on the principles set out in the third (2013) edition of 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA), produced by the Landscape Institute with the Institute of Environmental Management and Assessment. Reference will also be made to national, regional and local guidance and policies. A brief overview of the methodology follows. A more detailed explanation will be provided as part of the townscape and visual impact assessment.

39 Assessment of the effect of any proposed development on a receptor (an area of townscape or a view as experienced by a viewer or 'visual receptor' in the location in question) is made on the basis of professional judgement which takes into account relevant planning policies and guidance. It is based on the following method.

40 The sensitivity of the townscape or view as existing will be assessed as high, medium or low, depending on the importance, value and quality of the townscape character area or view, and its susceptibility to change, taking into account the quality of the townscape character area or view, and the nature and expectation of the viewer for views. The assessment of sensitivity takes into account the presence of any designated heritage assets (listed buildings, conservation areas, registered parks and gardens of special historic interest, world heritage sites) and non-designated heritage assets (locally listed buildings), and the amenity value of the viewing location and area in which it is located. The assessment of the sensitivity of the townscape or view under consideration is moderated to take into account a judgement about its quality in the round.

41 The magnitude of the change resulting from the Proposed Development will be assessed as high, medium, low or negligible according to the change to the receptor.

42 The magnitude of change and / or the sensitivity may be assessed as being at an intermediate point between the criteria set out above e.g. a change of 'medium to high' magnitude.

43 These two measures are combined to provide a measure of the scale of the effect – major, moderate, minor or negligible - on the receptor which will result from the Proposed Development. The scale of effect may be assessed as being at an intermediate point between the criteria set out above e.g. 'minor to moderate' scale of effect. Following the determination of the scale of the effect, the significance (in EIA terms) of the resultant effect is defined. Effects that are negligible or minor in scale are considered 'not significant'. Effects that are moderate or major in scale are judged to be 'significant'.

44 Effects are assessed as beneficial, adverse, or neutral. The assessment as beneficial or adverse is a 'net equation', since with regard to the receptor that is being assessed, there may be both positive and negative effects as a result of the Proposed Development. A neutral effect is one in which there is no noticeable beneficial or adverse effect, or in which the effect is considered neither beneficial nor adverse overall, having made a 'net equation' judgment that takes into account both beneficial and adverse impacts. Any effect, including one that is significant (because of the combination of magnitude and sensitivity), may be neutral in respect of the qualitative effect on the receptor under consideration.



45 For each of the identified views in the assessment to be produced, there will be images of the view 'as existing' and 'as proposed'. 'As proposed' images are to be provided as 'Accurate Visual Representations' ('AVRs'). AVRs are provided either as rendered (photorealistic) images ('AVR3') or as 'wirelines' (diagrammatic representations showing the outline of the Proposed Development, 'AVR1'). Rendered and wireline images illustrate accurately the degree to which the Proposed Development will be visible, and its form in outline. Rendered images also show the detailed form and the proposed use of materials.

46 Where other developments in the wider area which are proposed or have been granted consent would be visible to a significant extent in the view, a further image showing these schemes together with the Proposed Development ('as proposed with cumulatives') will be produced as part of the cumulative assessment.

47 For each of the identified views, a description of the view as existing will be given, identifying its visual quality, sensitivity to change and reason for that sensitivity. A description of the view as proposed will then be given with an assessment, based on the method set out above, of the significance of the effect that the Proposed Development will have on the view. A further assessment will consider cumulative effects, if any, for each view ('as proposed with cumulatives' images will also be provided as AVRs). The approach to cumulative assessment for views and townscape will be to focus on the additional effects of the Proposed Development on top of the cumulative baseline.

Cumulative Assessment

48 An assessment will be given of cumulative effects, if any, for each heritage asset, view and townscape character area.

49 If construction of the cumulative schemes were to occur simultaneously with that of the Proposed Development, they would have the potential to result in the following effects:

- Temporary change in settings of heritage assets and townscape character areas during demolition and construction; and
- Temporary visual intrusion during the demolition and construction.

50 Any potential cumulative construction effects will be described within the HTVIA.

51 The approach to cumulative assessment for built heritage, townscape and views once the Proposed Development is completed and operational will be to focus on the additional effects of the Proposed Development on top of the cumulative baseline. 'As proposed with cumulatives' images will also be provided as AVRs for each viewpoint to show the visibility of any relevant cumulative schemes.



TOPIC SHEET

TRAFFIC AND TRANSPORT

Introduction

It is considered that there is the potential for likely significant effects relating to transport and so this topic shall be **SCOPED IN** to the EIA. The traffic and transport assessment will be undertaken by Arup.

The ES traffic and transport assessment shall:

- Define the transport baseline conditions;
- Identify relevant transport receptors;
- Assess:
 - a. the potential for transport impacts throughout the demolition and construction works and as a result of the completed development and resultant transport effects;
 - b. the likely significant transport effects;
 - c. any required mitigation or monitoring to address any likely significant adverse transport effects;
 - d. the potential for cumulative transport effects.

The planning application will also be supported by a Transport Assessment (TA). The Traffic and Transport assessment as part of the ES will draw upon information within the TA; all information relied upon in the preparation of the ES Chapter will be presented in **ES Volume 3, Appendix Traffic and Transport**.

The ES Chapter will be prepared on the basis of the TA, but this Chapter will provide sufficient information to enable the reader to understand the likely significant effects of the Proposed Development in relation to traffic and transport. The methodology to be applied in the TA is subject to separate but parallel scoping discussions. Pre-application consultation is ongoing with both Transport for London (TfL) and the LBS in order to agree the scope and approach to the TA.

Baseline Conditions

Current Baseline Conditions

- 1 Current baseline conditions will be defined through a combination of desktop study, review of past survey and studies, site visits, and the collection of new primary data where necessary. The full extent of the baseline study will be defined through the separate Transport Assessment (TA) scoping process but, relevant to the assessment of environmental effects, is expected to include:
 - A review of healthy mode networks including pedestrian and cycle facilities;
 - A review of existing public transport service networks including bus and rail;
 - A review of the existing vehicle (road) network; and
 - A review of existing network and site travel demand such as vehicle, pedestrian, cycle and public transport flows.

Future Baseline Conditions

- 2 Future baseline conditions will be defined through a combination of desktop study, review of cumulative scheme proposals, and a review of any changes committed to transport network infrastructure, demand or use. The full extent of the baseline study will be defined through the separate TA scoping process but, relevant to the assessment of environmental effects, is expected to include:
 - A review of cumulative developments, the demand arising from them, and if and how that may affect the study area for this assessment; and
 - A review of committed transport works and schemes, the changes to network capacity and conditions arising from them, and if and how that may affect the study area for this assessment.

Receptors

- 3 The potential receptors are those people making journeys within the relevant study area for each mode; pedestrians, cyclists, public transport users and road users. For each effect to be assessed, receptors will be identified within each study area; with each study area being defined by assessor judgement based on available data, forecasts and proposals and will be consistent with the TA. The study areas will include pedestrian, cycle, public transport and road networks and are described in the Assessment of Effects section of this Chapter.
- 4 The sensitivity of receptors within study areas will be defined with regard to **Error! Reference source not found..**

Table 1 Sensitivity of Receptors

Sensitivity	Typical description	Transportation approach
Very High	Very high importance and rarity, international scale and very limited potential for substitution.	Receptors travelling on internationally important routes/journeys (such as routes to ports) at significant volumes Receptors travelling on routes/journeys where there is no alternative (such as a single route across a railway line for a particular mode/group/town) at significant volumes Vulnerable road user Receptors travelling on networks at significant volumes (such as immediately outside schools or doctors' surgeries)
High	High importance and rarity, national scale, and limited potential for substitution.	Receptors travelling on nationally important routes/journeys (such as the national cycle network or motorways) at significant volumes Receptors travelling on routes/journeys where there is little alternative (such as multiple but infrequent routes across a railway line for a particular mode/group/town) at significant volumes Vulnerable road user Receptors travelling on networks at significant volumes (such as on main approaches to schools or doctors' surgeries)
Medium	High or medium importance and rarity, regional scale, limited potential for substitution.	Receptors travelling on routes/journeys important at a district level (such as a road or cycle route connecting two towns) at significant volumes Receptors travelling on routes/journeys where there is some alternative (such as a public right of way or footway forming part of a coarse wider network of routes) at significant volumes Vulnerable road user Receptors travelling on networks at a non-elevated rate (such as in a residential area away from schools and doctors' surgeries)
Low	Low or medium importance and rarity, local scale.	Receptors travelling on routes/journeys important at a town scale (such as local 'through' routes) at significant volumes Receptors travelling on routes/journeys where there is similar/equivalent alternatives (such as a local street in a network of connected streets) Vulnerable road user Receptors travelling on networks at a very low rate (such as a rural road away from schools and doctors' surgeries)
Negligible	Very low importance and rarity, local scale.	Receptors travelling on local estate level routes/journeys (such as residential streets not serving a significant 'through' function) Receptors travelling on routes/journeys where there is little demand for that route

- 5 For the purposes of the table above, vulnerable road users are pedestrians, cyclists, motorcyclists and horse riders, and in those particularly sensitive groups (as described in Effective Scoping of Human Health) including people of a young age (such as children, young adults, unborn children), of an older age (such as older people, and frail older people), with low income or insecure income or social disadvantage (such as social isolation; and people who experience discrimination), with health issues (such as poor physical or mental health, disabilities,



carers of people with poor health), and with vulnerability due to access and geographic factors (such as experiencing barriers in access to services/amenities, living in areas known to exhibit high deprivation or poor economic and/or health indicators).

- 6 The sensitivity of each receptor is specific to each location for each assessment and will be defined in each assessment presented in the ES chapter based on these criteria

Assessment of Effects

- 7 The proposed scope draws upon the guidance set out in the following documents:
- 'Guidelines for Environmental Impact Assessment, IEMA, 2004';
 - 'IEMA (2023) Environmental Assessment of Traffic and Movement (the IEMA Guidelines).
- 8 The proposed scope also draws on the following Design Manual for Roads and Bridges documents which provide some helpful guidance and reference, although not directly applicable to this EIA as the Proposed Development is not a motorway or all-purpose trunk road.
- 'LA 104 Environmental Assessment and Monitoring, Rev 1'
 - 'LA 112 Population and Human Health, Rev 1'
- 9 The methodology set out in this report gives strong regard to the IEMA Guidelines which states in paragraph 4.5:
- "...For many, effects there are no simple rules or formulae which define thresholds of significance and there is, therefore, a need for interpretation and judgement on the part of the assessor, backed-up by data or quantified information wherever possible..."

Policy and Legislation

- 10 The assessment of transport effects will be undertaken in the context of the following key transport policy and legislation:
- National Planning Policy Framework, MHCLG (now DLUHC), 2021;
 - Planning Practice Guidance, MHCLG (now DLUHC), 2014-2022;
 - London Plan, GLA, 2021;
 - Mayors Transport Strategy, GLA, 2018;
 - Southwark Plan, LBS, 2022;
 - Highways Act 1980 (as amended);
 - New Roads and Street Works Act 1991 (as amended);
 - Town and Country Planning Act 1990 (as amended).

Magnitude of Impact

- 11 For each effect to be assessed, criteria for assessing Magnitude of Impact are defined in this section. Broadly, the Magnitude of Impact will be defined as follows:
- **Very Large** – changes which are likely to be perceptible and which would severely change conditions which would otherwise prevail to the extent that it would severely affect travel behaviour (such as the closure of a major junction or road during peak times on an already congested network or the creation of a pedestrian new route across a railway line on a strong desire line).
 - **Large** – changes which are likely to be perceptible and which would significantly change conditions which would otherwise prevail to the extent that it would significantly affect travel behaviour (such as the night time closure of a road or the introduction of a new controlled pedestrian crossing on a busy road).
 - **Medium** – changes which are likely to be perceptible and which would materially change conditions which would otherwise prevail to the extent that it may affect travel behaviour to some degree (such as a change



in road network capacity which may lead to some rerouting or retiming of journeys, or creation of a secondary supplementary route servicing a similar function as an existing route); and

- **Small** – changes which are likely to be perceptible but not the extent that it would materially change conditions which would otherwise prevail (such as the introduction of a new site access junction or resurfacing of a footway); and
- **Negligible** – changes which are unlikely to be perceptible (such as a low change in traffic or pedestrian volumes).

Scale of Effects

- 12 The Scale of Effect is determined through the combination of Sensitivity of Receptor and Magnitude of Impact. **Error! Reference source not found.** below sets out how these categorisations will be combined.

Table 2 Scale of Effect

		Magnitude of Impact (Degree of Change)					
		No Change	Negligible	Small	Medium	Large	Very Large
Environmental Value (Sensitivity)	Very High	Neutral	Slight	Moderate or Major	Major or Very Major	Very Major	Very Major
	High	Neutral	Slight	Slight or Moderate	Moderate or Major	Large or Very Major	Very Major
	Medium	Neutral	Neutral or Slight	Slight	Moderate	Moderate or Major	Major
	Low	Neutral	Neutral or Slight	Neutral or Slight	Slight	Slight or Moderate	Moderate
	Negligible	Neutral	Neutral	Neutral or Slight	Neutral or Slight	Slight	Slight

- 13 Generally, a significant effect in EIA terms is one which is moderate beneficial/ adverse or above. An effect which is neutral or slight beneficial/ adverse is generally considered to be 'not significant' in EIA terms.

Assessment Scenarios

- 14 The assessment scenarios will be consistent with those considered in the Transport Assessment which is subject to separate parallel scoping discussions. The following broad baseline scenarios will be considered, the detail of which will be agreed through the TA scoping discussions.
- Do Minimum / Future Base – the reference scenario relative to which the changes arising from Proposed Development will be considered. This will include the existing/ surveyed conditions plus any changes which are committed or otherwise reasonably expected (as agreed) to take place to existing conditions by the future design year(s) (which will be consistent with the TA to be agreed through TA scoping).
- 15 This is the scenario against which the potential effects of the Proposed Development will be assessed.
- 16 The schemes which will be included in the baseline scenario will be agreed separately through the TA scoping discussions but are expected to include those near-by developments which have planning permission (or committee resolution to grant consent) and which the local planning authority and local highway authority reasonably expects will be constructed by the assessment year. It may also include other broad background growth and schemes as agreed as being necessary and appropriate and reasonably expected to arise by the assessment year such as wider Local Plan development.
- 17 The following broad development assessment scenarios will be considered, the detail of which will be agreed through the TA scoping discussions.
- Do Something / Future Base plus Development – this will include the 'Do Minimum / Future Base' scenario plus the Proposed Development in the future design year(s).
- 18 This will be considered for both operation and for demolition and construction of the Proposed Development as appropriate.



Potential Effects

19 The IEMA Guidelines set out a number of potential environmental impacts which may require assessment. Those which relate to the Transportation Chapter are summarised below.

- Severance of communities;
- Road vehicle driver and passenger delay;
- Non-motorised user delay;
- Non-motorised user amenity;
- Fear and intimidation;
- Accidents and Safety on and by road users;
- Road user and pedestrian safety; and
- Hazardous/large loads.

20 Non-motorised user amenity and Fear and intimidation on and by road users can be considered together as they are strongly interrelated. Each of the potential impacts are detailed below.

21 This section sets out whether each of the potential effects set out above are scoped in or scoped out and the basis for that judgement. It also defines broadly the geographical boundaries of the assessment; the study area. The IEMA Guidelines sets some useful criteria for determining a study area in paragraph 2.16 which has been used for context:

- “Rule 1: Include highway links where traffic flows will increase by more than 30% (or the number of HGVs will increase by more than 30%);
- Rule 2: Include any other specifically sensitive areas where traffic flows have increased by 10% or more.”

22 These criteria can similarly be applied to changes in other modes as useful context to inform an assessor’s judgement.

Severance of Communities

23 Severance is defined by the IEMA Guidelines in paragraph 4.273.13:

“Severance is the perceived division that can occur within a community when it becomes separated by a major traffic artery. The term is used to describe a complex series of factors that separate people from places and other people. Severance may result from the difficulty of crossing a heavily trafficked road or a physical barrier created by the road itself. It can also relate to quite minor traffic flows if they impede pedestrian access to essential facilities...”

Road Vehicle Driver and Passenger Delay

24 Drawing upon the IEMA Guidelines and professional experience, driver delay and delay to bus users may change where:

- Traffic flows change at junctions;
- New junctions are introduced;
- Existing junctions are changed;
- Speeds on existing links are changed;
- Existing links are closed;
- New links are opened;
- Frequency of use of controlled pedestrian or cycle crossings change; and
- New controlled pedestrian or cycle crossings are introduced.



25 Delay to bus users may also change where bus routes or bus stops are proposed to be changed or where demand for a bus exceeds capacity.

Non-Motorised User Delay

26 Drawing upon the IEMA Guidelines and professional experience, pedestrian and cyclist delay may change where:

- Pedestrians and cyclists cross existing roads where traffic flows are projected to change;
- Pedestrians and cyclists cross new roads;
- Existing roads which pedestrians and cyclists would have crossed are removed;
- Speed limit or prevailing speeds change;
- Pedestrian and cycle volumes change;
- New crossing facilities are provided; and
- Existing pedestrian crossing facilities change.

Rail Delay

27 Drawing upon the IEMA Guidelines and professional experience, rail delay (experienced by passengers of National Rail and London Overground services) may change where:

- Passenger areas within stations become congested; and
- Demand for a train exceeds capacity.

Non-Motorised User Amenity, Fear and Intimidation on and by Road Users

28 Amenity is defined in paragraph 3.29 of the IEMA Guidelines as follows:

“Pedestrian amenity is broadly defined as the relative pleasantness of a journey, and is considered to be affected by traffic flow, traffic composition and pavement width/separation from traffic. This definition also includes pedestrian fear and intimidation, and can be considered to be a much broader category including consideration of the exposure to noise and air pollution, and the overall relationship between pedestrians and traffic”.

29 The IEMA Guidelines further describe fear and intimidation on and by road users as being ‘created by all moving objects’ and goes on to note the following in the context of fear and intimidation on and by road users:

“While the traffic and movement assessment has to consider motorcycles, cars, lorries and buses, this scope of consideration is not exclusive – it also has to consider other modes of travel, including horses, cycles, mobility scooters, e-scooters and e-cycles, if appropriate”.

30 The IEMA Guidelines describe fear and intimidation on and by road users as being dependent on:

- The total volume of traffic;
- The heavy vehicle composition;
- The speed these vehicles are passing;
- The proximity of traffic to people – and/or the feeling of the inherent lack of protection created by factors such as a narrow pavement median, a narrow path or a constraint (such as a wall or fence) preventing people stepping further away from moving vehicles.

31 Non-motorised user amenity and fear and intimidation on and by road users may be considered for pedestrians, cyclists, bus passengers and rail passengers.



Road User and Pedestrian Safety

- 32 The key issue in assessing accidents and safety is in understanding the potential for change. There can be some small changes in prevailing road safety conditions arising simply as a result of having a greater number of journeys being made on a network; very simply, the more people that are travelling, the more people that are liable to become involved in an accident. By far the more important issue to consider is how travel and the design of the transport networks interrelate to affect prevailing road safety. In that context, prevailing road safety may change where:

- Fundamental changes are proposed to the form of nature of a transport network such as changes to the geometry of a junction or changing the form of a junction; and
- Fundamental changes are proposed to prevailing travel patterns on transport networks not designed to cater for them such as introducing a pedestrian demand on a rural road without footways or introducing a pedestrian demand across a heavily trafficked and high speed road without a suitable crossing provision.

Hazardous Loads

- 33 Hazardous/large loads are discussed in paragraph 3.49 of the IEMA Guidelines:

“Some developments may involve the transportation of dangerous or hazardous loads by road and this should be recognised within any traffic and movement assessment. Such movements should include specialist loads that might be involved in the construction or decommissioning phases of the development, in addition to movements associated with the operation of the establishment.”

- 34 Hazardous loads could include, for example:

- Explosives;
- Gases;
- Flammable liquid;
- Flammable solids;
- Oxidising substances;
- Toxic substances;
- Radioactive material; and
- Corrosive substances.

Demolition and Construction

Severance of Communities

- 35 During demolition and construction, the Proposed Development may result in changes which could significantly affect perceptions of severance. Whilst the level of construction traffic is likely to be modest throughout the demolition and construction works in general, and particularly in the context of the level of traffic and proportion of HGVs on Peckham High Street and Hanover Park, the short-term high intensity activity of exporting of earthworks is likely to generate a spike in HGV movement. The temporary control or diversion of existing pedestrian routes may also affect perceptions of severance. Severance is therefore **scoped in** for the demolition and construction stage assessment.

- 36 The study area for severance in the demolition and construction phase is proposed to be those locations where existing pedestrian routes may need to be closed temporarily and locations where earthworks excavation may increase the proportions of HGVs significantly which could include the following:

- Routes through the site;
- Hanover Park; and
- Clayton Road.



Road Vehicle Driver and Passenger Delay

- 37 During demolition and construction, the Proposed Development could result in changes which could significantly affect perceptions of road vehicle driver and passenger delay because of the implementation of works to the existing highway network which may require temporary traffic control or diversion. Driver/bus delay is therefore **scoped in** for the demolition and construction stage assessment. The study area for driver/bus delay in the demolition and construction phase is proposed to be as follows:

- Locations where works are proposed to the existing highway to be defined through the TA.

- 38 Road vehicle driver and passenger delay will be assessed qualitatively based on a review of the quantitative data available in the Transport Assessment. This will be assessed using assessor judgment in the context of the principles set out Paragraph 3.20 of the IEMA Guidelines including:

“delays are only likely to be significant when the traffic on the network surrounding the development is already at, or close to, the capacity of the system”

Non-Motorised User Delay

- 39 During demolition and construction, the Proposed Development could result in changes which could significantly affect perceptions of pedestrian and cyclist delay because of the implementation of works to the existing highway network and across the site which may require temporary control or diversion. Pedestrian and cyclist delay is therefore **scoped in** for the demolition and construction stage assessment. The study area for pedestrian and cyclist delay in the demolition and construction phase is proposed to be those locations where works are proposed to the existing highway and where temporary diversions and closures to routes within the site are proposed which could include the following:

- Routes through the site;
- Hanover Park;
- McKerrell Road;
- Rye Lane; and
- Peckham High Street.

- 40 Pedestrian & cyclist delay will be assessed qualitatively based on the nature of the Proposed Development demolition and construction proposals using assessor professional judgment.

Rail Delay

- 41 The Proposed Development is not expected to result in changes which could significantly affect perceptions of rail delay during demolition and construction because the Proposed Development does not propose any changes to railway infrastructure and because demolition and construction activities would not reasonably be expected to affect railway operations. Rail delay is therefore **scoped out** of the demolition and construction assessment.

Non-Motorised User Amenity, Fear and Intimidation on and by Road Users

- 42 During demolition and construction, the Proposed Development may result in changes which could significantly affect perceptions of amenity, fear and intimidation because, while the level of construction traffic is likely to be modest throughout demolition and construction in general and particularly in the context of the level of traffic and proportion of HGVs on Peckham High Street and Hanover Park, the short-term high intensity activity of exporting of earthworks is likely to generate a spike in HGV movement. Amenity, fear and intimidation is therefore **scoped in** for the demolition and construction stage assessment.

- 43 The study area for amenity, fear and intimidation in the demolition and construction phase is proposed to be locations where earthworks excavation may increase the proportions of HGVs significantly which could include the following:

- Routes through the site;



- Hanover Park; and
- Clayton Road.

44 Amenity, fear and intimidation will be assessed qualitatively based on a review of the quantitative data available in the Transport Assessment. This will be assessed using assessor professional judgment in the context of the principles set out in Paragraph 3.34 of the IEMA Guidelines including:

“there are no commonly agreed thresholds for estimating these levels of danger hence of fear and intimidation from known traffic and physical conditions... there will be a need for judgement to be exercised in determining the degree of fear and intimidation... Special consideration should be given to areas where there are likely to be particular problems such as high speed sections of road, locations of turning pints and accesses...”

Road User and Pedestrian Safety

45 The Proposed Development is not expected to result in changes which could significantly affect accidents and safety during demolition and construction because it is an explicit requirement of the highway authorities that any planning application proposals do not unacceptably increase safety risks. Accidents and safety is therefore **scoped out** for the assessment of the Proposed Development during demolition and construction. This will though be considered in the Transport Assessment as appropriate for that separate document (potentially including assessment of prevailing road safety patterns and Road Safety Audits of proposed infrastructure).

Hazardous Loads

46 The Proposed Development is not expected to generate or attract hazardous loads during demolition and construction. Hazardous loads are therefore **scoped out** of the assessment of the Proposed Development during demolition and construction.

Phasing

47 Forecasts for movements associated with demolition and construction activities will be considered for the full construction programme to identify those phases and periods which may result in significant effects. The implementation of specific transport interventions (such as highway works) which may result in significant effects will also be considered individually within the wider development phasing programme.

Completed Development

Severance of Communities

48 The Proposed Development could result in changes which could significantly affect perceptions of severance during operation because of the potential for changes to routes across the site and changes to highway infrastructure (such as new crossings). The Proposed Development is not expected result in increased traffic flows but may result in some reductions, however these are unlikely to significantly affect perceptions of severance. Severance is therefore **scoped in** for the assessment of the Proposed Development in operation. The study area for severance in the operational phase is proposed to be those locations where new routes and changes to routes across streets are proposed which could include the following:

- Routes through the site;
- Hanover Park;
- McKerrell Road;
- Rye Lane; and
- Peckham High Street.

49 Severance will be assessed qualitatively based on a review of the quantitative data available in the Transport Assessment. This will be assessed using assessor judgment in the context of the principles set out in Paragraphs 3.14 to 3.7 of IEMA Guidelines including:



“The correlation between the extent of severance and the physical barrier of a road is not clear and there are no predictive formulae which give simple relationships between traffic factors and levels of severance... Factors which need to be given attention in determining whether severance is likely to be an important issue include road width, traffic flow and composition, traffic speeds, the availability of crossing facilities and the number of movements that are likely to cross the affected route... The assessment of severance should pay full regard to specific local conditions, e.g. whether crossing facilities are provided or not, traffic signal settings etc”

Rad Vehicle Driver and Passenger Delay

50 The Proposed Development could result in changes which could significantly affect perceptions of driver/passenger delay during operation because of changes to the highway network and due to increased demand for bus services. The development is not expected to result increases in vehicle travel demand. Driver/bus delay is therefore **scoped in** for the assessment of the Proposed Development in operation. The study area for driver/bus delay in the operational phase is proposed to be bus services subject to increased loading and parts of the highway network subject to changes as a result of the development which could include the following:

- Peckham bus services;
- Hanover Park;
- McKerrell Road;
- Rye Lane; and
- Peckham High Street.

51 Driver and bus delay will be assessed qualitatively based on a review of the quantitative data available in the Transport Assessment. This will be assessed using assessor judgment in the context of the principles set out in Paragraphs 3.20 of the IEMA Guidelines including:

“delays are only likely to be significant when the traffic on the network surrounding the development is already at, or close to, the capacity of the system”

Non-Motorised User Delay

52 The Proposed Development could result in changes which could significantly affect perceptions of pedestrian and cyclist delay during operation because achieving good quality pedestrian and cycle connections to/from and within the site will be a core feature of the application scheme and may improve perceptions of delay. Pedestrian and cyclist delay is therefore **scoped in** for the assessment of the Proposed Development in operation. The study area for pedestrian and cyclist delay in the operational phase is proposed to be those locations where new routes and changes to routes are proposed which could include the following:

- Routes through the site;
- Hanover Park;
- McKerrell Road;
- Rye Lane; and
- Peckham High Street.

53 Pedestrian & cyclist delay will be assessed qualitatively based on the nature of the Proposed Development using assessor professional judgment.

Rail Delay

54 The Proposed Development may result in changes which could significantly affect perceptions of rail delay during operation because of the additional demand for rail services arising from the proposed development. Rail delay is therefore **scoped in** for the assessment of the Proposed Development in operation. The study area for rail delay in the operational phase is proposed to include Peckham Rye Station.



- 55 Rail delay will be assessed qualitatively based on a review of the quantitative data available in the Transport Assessment. This will be assessed using assessor judgment in the context of the principles set out in the IEMA Guidelines.

Non-Motorised User Amenity, Fear and Intimidation on and by Road Users

- 56 The Proposed Development could result in changes which could significantly affect perceptions of amenity, fear and intimidation during operation because of changes to traffic patterns and changes to highway infrastructure. Amenity, fear and intimidation is therefore **scoped in** for the assessment of the Proposed Development in operation. The study area for amenity, fear and intimidation in the operational phase is proposed to be as follows:

- Routes through the site;
- Hanover Park;
- McKerrell Road;
- Rye Lane; and
- Peckham High Street.

- 57 Amenity, fear and intimidation will be assessed qualitatively based on a review of the quantitative data available in the Transport Assessment. This will be assessed using assessor judgment in the context of the principles set out in the IEMA Guidelines including:

"there are no commonly agreed thresholds for estimating levels of danger, or fear and intimidation, from known traffic and physical conditions... there will be a need for judgement to be exercised in determining the degree of fear and intimidation... Special consideration should be given to areas where there are likely to be particular problems such as high speed sections of road, locations of turning pints and accesses..."

Road User and Pedestrian Safety

- 58 The Proposed Development is not expected to result in changes which could significantly affect accidents and safety during operation because it is an explicit requirement of the highway authorities that any planning application proposals do not unacceptably increase safety risks. Accidents and safety is therefore **scoped out** for the assessment of the Proposed Development during operation. This will though be considered in the Transport Assessment as appropriate for that separate document (potentially including assessment of prevailing road safety patterns and Road Safety Audits of proposed infrastructure).

Hazardous Loads

- 59 The Proposed Development is not expected to generate or attract hazardous loads during operation. Hazardous loads are therefore **scoped out** of the assessment of the Proposed Development during operation.

Assessment Scope Summary

- 60 The proposed assessment scope is summarised below in **Error! Reference source not found..**

Table 3 Assessment Scope Summary

Potential Effect	Demolition and Construction	Completed Development
Severance of Communities	✓	✓
Road Vehicle Driver and Passenger Delay	✓	✓
Non-Motorised User Delay	✓	✓
Rail Delay	✗	✓
Non-Motorised User Amenity, Fear and Intimidation on and by Road Users	✓	✓
Road User and Pedestrian Safety	✗	✗
Hazardous/Large Loads	✗	✗



Cumulative Assessment

- 61 All cumulative schemes relevant to the assessment of traffic and transport effects will be included in the future baseline assessment year. As such the assessment is inherently cumulative and no further cumulative assessment will be undertaken.



TOPIC SHEET

WASTE AND MATERIALS

Introduction

It is considered that significant effects relating to waste and materials are unlikely and as such this topic is **SCOPED OUT** of the EIA. The following sections provides a summary of the baseline conditions and the site and surrounding context with regards to waste and materials and clarifying why no likely significant effects are expected. This Topic Sheet has been prepared by Trium.

IEMA Guide – Identification of Sensitive Receptors

- 1 The sensitive receptor identified by the IEMA guidance¹ for waste is landfill void capacity, however, additional information on the local and regional (i.e., London) infrastructure has also been included to provide a robust comparison.
- 2 Waste arisings or material consumed from the extraction, processing and manufacturing of construction components and products have not been included in this scoping text. Therefore, this scoping text will only focus on providing information on the UK's available demand / consumption of construction materials. Although it should be noted that this will be covered within the Construction Environmental Management Plan (CEMP) which will be submitted in support of the planning application.

IEMA Guidance for Assessing Magnitude

Materials

- 3 The methodology for assessing the magnitude of effects from the materials consumed is provided in **Table 1**.

Table 1 Methodology for Assessing Magnitude for Materials

No Change	Negligible	Minor	Moderate	Major
No material is required	No individual material required is equal or greater than 1 % of the volume	One or more material is between 1-5% by volume of the availability	One or more material is between 6-10% by volume of the availability	One or more material is >10% by volume of the availability

Waste

- 4 Method W1 of the IEMA guidance has been used to assess the magnitude of effects from the waste generated. This is provided in **Table 2**.

Table 2 Methodology for Assessing Magnitude for Waste

No Change	Negligible	Minor	Moderate	Major
Zero waste generation and disposal from the development	Waste generated from the development will reduce landfill void capacity baseline by <1%	Waste generated from the development will reduce landfill void capacity baseline by 1-5%	Waste generated from the development will reduce landfill void capacity baseline by 6-5%	Waste generated from the development will reduce landfill void capacity baseline by >10%

Baseline Conditions

London Borough of Southwark (LBS) – Current Waste Arisings

Household, Commercial and Industrial (HC&I)

- 5 The London Borough of Southwark (LBS), through the Southwark Plan 2022, have established targets and goals for the management and minimisation of waste within the borough. It seeks to ensure that waste is collected and managed in a sustainable manner, in line with the principles of the waste hierarchy.
- 6 In order to achieve the council's strategic goals, the LBS entered into a 25-year contract in February 2008 with Veolia Environmental Services. Under the terms of the contract, Veolia undertake all waste and recycling collection, treatment and disposal operations. Prior to LBS's contract with Veolia, Southwark's Waste Minimisation Strategy (2007 – 2010) set out the proposals for addressing waste growth by primarily minimising household waste, other types of Municipal Solid Waste such as commercial waste were also considered. Veolia Environmental Services have assumed responsibility for the implementation and monitoring of the Strategy in the medium and longer term.
- 7 As part of its 25-year waste management contract with the LBS, Veolia constructed an Integrated Waste Management Facility ('IWMF'), off Old Kent Road which became operational in January 2012. The facility includes a Materials Recovery Facility and a Mechanical Biological Treatment facility, a public Reuse and Recycling Centre and an Education and Visitor Centre.
- 8 Waste has been identified as a key issue for management within the LBS. The Southwark Plan identifies the IWMF as the safeguarded waste site for the borough in order to contribute to meeting the borough's apportionment targets. The IWMF is of major strategic importance to the LBS as it provides the capacity to enable the LBS to manage its municipal waste arisings and enable the recycling and composting targets for the borough to be met in line with the Waste Management Strategy.
- 9 As detailed within the 'Southeast London Joint Waste Planning Technical Paper', the proportion of the IWMF's waste processing capacity which contributes to the borough's apportionment target was, in 2016, 104,850 tonnes per annum (tpa). The borough's prescribed apportionment target is 172,000tpa (including household and commercial and industrial waste), representing a shortfall of 67,150tpa in throughput capacity. According to the London Plan (March 2021), in 2041 the borough is required to have the capacity to meet an apportionment target of 159,000tpa (including household and commercial and industrial waste). The IWMF is able to process a maximum of 205,176 tonnes per annum (tpa), of which 111,150 tpa counts towards meeting the apportionment target. Therefore, there is anticipated to be a shortfall 135,850tpa. Details of the methodology are set out in the Joint South East London Waste Group Technical Paper evidence base document.
- 10 As detailed above, the London Plan (March 2021) also provides the current Household, Commercial and Industrial (HC&I) waste arisings and apportionment targets for the LBS and are provided in **Table 3**.

Table 3 LBS Operational C&I Apportionment Targets and Projections in the London Plan (March 2021)

Area	Arisings (tonne per annum (tpa))		Apportionment* Tonnage (tpa)	
	2021	2041	2021	2041
LBS	292,000	308,000	150,000	159,000

*apportionment = share of London's total waste to be managed by a borough

- 11 In line with the Southwark Plan, the IWMF will be protected for waste management purposes unless "the site is surplus to requirements; or another facility is provided that meets the same throughput as the existing site".

¹ Institute of Environmental Management and Assessment (IEMA), (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment, Guidance for a proportionate approach.



Additionally, the Southwark Plan states that new and extended waste management facilities should be permitted where “they are in a suitable location which does not cause unacceptable harm to residential amenity, the environment or transport network; and they are planned and designed according to the following principles of sustainable waste management”.

- 12 The LBS is one of six London boroughs that form the south-east London boroughs joint waste planning group (hereon referred to as the ‘Waste Planning Group’) which work together to identify and meet sub-regional requirements for waste management facilities. The Southeast London Joint Waste Planning Technical Paper demonstrates that the Waste Planning Group can expect a surplus over the apportionment targets set in the London Plan (March 2021).
- 13 It is, therefore, expected that these facilities and land suitable for new waste facilities combined would provide sufficient capacity within the waste planning group jurisdiction to manage the apportionment targets, up to 2036.

Construction, Demolition and Excavation Waste

- 14 The current CD&E waste arisings have been sourced using the Environment Agency’s (EA) Waste Data Interrogator (WDI). The CD&E waste arisings have been identified within the WDI under the European Waste Code (EWC) Chapter 17 (Construction and Demolition). The CD&E waste arisings recorded with an origin of South East of England 2020 have been provided in **Table 4**.

Table 4 CD&E Arisings in Southwark and South East London

Borough	Year	Quantity (Tonnes)
Southwark	2020	642.18
South East London		382,064.502

- 15 Uncontaminated soils excavated during the construction of a development which are to be reused on the same site for the purposes of construction, are not considered to be a waste and will therefore not be given an EWC code. If the soil is to be exported from the site (even to be reused as fill on another site), the soil must be classified using an EWC code. Hence, there may be some excavation waste generated from LBS, which is not received by waste management facilities and will therefore not be included in **Table 4**.

Current Regional Inert and Non-Hazardous Landfill Void Capacity

- 16 **Table 5** shows the remaining inert and non-hazardous landfill void capacity in the South East of England and London. The most recent data for the inert and non-hazardous regional landfill void capacity (i.e., 2020) has been used as a baseline for this assessment: 45,424,461 m³.

Table 5 Regional (South East of England) and Local Inert and Non Hazardous Landfill Void Capacity

Type	Landfill Void Capacity (m ³)		
	2018	2019	2020
Inert	30,285,261	29,177,494	27,751,909
Non-Inert	20,966,954	15,142,524	17,672,552
Total	51,252,215	44,320,018	45,424,461
Source: Waste Management 2018 in London and the South East ² , Waste Management 2019 in London and the South East ³ , Waste Management 2020 in London and the South East ⁴			

² Environment Agency, (2018); Remaining Landfill Capacity in South East and London Data Tables
³ Environment Agency, (2019); Remaining Landfill Capacity in South East and London Data Tables.
⁴ Environment Agency, (2020); Remaining Landfill Capacity in South East and London Data Tables.



Current National Hazardous Landfill Void Capacity

- 17 The national hazardous landfill void capacity in 2018, 2019 and 2020 is shown in **Table 6**. The most recent data for the hazardous landfill void capacity (i.e., 2020) has been used as a baseline for this assessment – 16,380,811m³.

Table 6 National (England) Hazardous Landfill Void Capacity

Type	Hazardous Landfill Void Capacity (m ³)		
Hazardous	19,210,846	18,443,160	15,571,171
Hazardous - Restricted	698,393	832,407	809,640
Total	19,909,239	19,275,567	16,380,811
Source: Waste Management 2018 in London and the South East, Waste Management 2019 in London and the South East, Waste Management 2020 in London and the South East			

Current UK Material Demand

- 21 Baseline information on national (UK) demand for material resources has been collected for the key raw materials: aggregates, concrete, asphalt, steel, wood, and glass, as shown in **Table 7**. These key materials are globally traded commodities with no known issues regarding UK supply and stock.

Table 7 National (UK) Demand for Material Resources

Material	UK Demand	Source
Steel	17 million tonnes	UK Steel Manifesto 2019: Laying the foundations for a vibrant UK steel industry ⁵ MPA: Profile of the UK Mineral Products Industry 2020 Edition ⁶
Aggregates (of which):	251 million tonnes	
Crushed Rock	117.3 million tonnes	
Sand and Gravel – land won	48.9 million tonnes	
Sand and Gravel – marine won	13.7 million tonnes	
Recycled and Secondary	71 million tonnes	
Ready-Mixed Concrete	54.2 million tonnes	
Concrete Products	32 million tonnes	
Asphalt	25.4 million tonnes	Forest Research: Forestry Statistics 2021 ⁷ British Glass: Glass Sector Net Zero Strategy 2050 ⁸
Wood	10.8 million tonnes	
Glass	3.5 million tonnes	

Discussion for Scoping Out

- 22 The Proposed Development’s environmental effects in relation to these aspects will be considered as part of the construction planning, design of the Proposed Development and summarised as part of the Design and Access Statement and other planning deliverables as appropriate, and planning condition(s) will be attached to the full planning permission (if consented) to secure the mitigation and management measures discussed within this planning application documents.
- 23 Furthermore, any impacts relating to the vehicle movements associated transportation of waste and materials (particularly during construction) will be dealt with where applicable in the traffic and transport ES Chapter (Refer to the Traffic and Transport Topic Sheet), and dust within the air quality ES Chapter (Refer to the Air Quality Topic Sheet).

⁵ Make UK, (2019); UK Steel – A new deal for steel: Laying the foundations for a vibrant UK steel industry
⁶ Mineral Products Association (MPA), (2018); Profile of the UK Mineral Products Industry (2018 Edition).
⁷ Forest Research, (2021); Forestry Statistics.
⁸ British Glass, Glass Sector Net Zero Strategy 2050



- 24 The following sections outline how waste and materials will be considered as part of the full planning application and provides justification as to why significant waste and materials effects are unlikely.

Waste

Demolition and Construction

- 25 The London Plan 2021 states that construction, demolition and excavation (CD&E) waste is re-used or recycled at a rate of between 85-95% for larger construction projects. Policy SI7 also provides a target of 95% for re-use and recycling of CE&D waste. It is anticipated that CE&D material unsuitable for re-use on site will be processed outside of the local waste management infrastructure.
- 26 During demolition and construction works, the greatest potential for waste arisings would be during demolition phases. Expected waste arising during the demolition and construction phases include inert materials, such as crushed concrete, hardcore and brick, as well as materials stripped out from the existing structures. The excavation phase would generate soil and rubble of varying classification, subject to physical and chemical analysis.
- 27 During demolition and construction, it is anticipated that any waste for recovery or waste for disposal generated from the site would be directed to active and permitted waste management sites within LBS and surrounding boroughs.
- 28 In accordance with IEMA's guide to Materials and Waste in Environmental Impact Assessment⁹, landfill capacity is considered to be a sensitive receptor. The types of waste (whether this be waste for recovery or waste for disposal) anticipated to be generated by the demolition and construction of the Proposed Development includes:
- Excavated soil and Made Ground;
 - Concrete;
 - Brick;
 - Glass;
 - Plastic and packaging;
 - Mixed metals;
 - Gypsum;
 - Mixed demolition and construction waste;
 - Canteen waste (e.g. foil, cardboard, plastic packaging, food waste etc.);
 - Card and paper; and
 - Hazardous waste (e.g. oils, paints, adhesives etc.).

- 29 Estimated volumes of material arising during these phases, as well as any specific mitigatory measures required will be presented within **ES Volume 1, Chapter 5: Demolition and Construction**. However, it is envisioned that majority of the waste generated during the construction, demolition and excavation phase will be either reused or recycled on site. Considering this and the available waste management infrastructure within the region to manage this type of waste, it can be established that the magnitude of impacts of this type of waste will be **negligible**.

Mitigation Measures

- 30 A CEMP (or equivalent) will be prepared and implemented throughout the construction works pursuant to a planning condition/s. The CEMP may be supported by a Site Waste Management Plan (SWMP)¹⁰ which would also be prepared and implemented throughout the construction works pursuant to a planning condition/s. Together, the measures defined within the CEMP and SWMP (if required) will minimise waste arising from

construction materials; example management measures include but are not limited to: avoiding the stockpiling of construction materials; preventing the overordering of construction materials by carrying out upfront cost analysis works; and storing the construction materials in an appropriate location that will minimise damage to materials.

- 31 Further to the above, additional mitigation measures that will be implemented include, but are not limited to, the following:
- Should hazardous or contaminated materials be identified, works in the area will temporarily stop, and the materials will be removed and disposed of in line with relevant legislation and guidance e.g. The Control of Asbestos at Work Regulation 2012 and Control of Substances Hazardous to Health Regulations (COSHH) 2002;
 - The setting of waste reduction targets and waste re-use / recycling targets prior to commencing works on-site and monitoring of such targets throughout the duration of the construction works; and
 - The implementation of waste segregation measures, whereby segregating the key / main waste streams, waste for recovery can be identified prior to leaving the site.
- 32 Considering the available capacity specified within the Local Plan for waste (including land suitable for new waste facilities) to accommodate the apportionment targets, and the adherence to mitigation measures pursuant to planning conditions, waste generated during the demolition and construction phases from the Proposed Development is not anticipated to cause strain to the borough's waste management facilities. Therefore, significant adverse effects on the local waste management infrastructure and landfill capacity, resulting from the waste expected to be generated during the demolition and construction of the Proposed Development, are considered unlikely.
- 33 On the basis of the above, it is proposed to scope out an assessment of the Proposed Development's construction effects on waste / landfill capacity; however, the ES will set out:
- The approximate type and quantities / volumes of construction waste that are expected to be generated by the Proposed Development;
 - The percentage or volumetric target for re-use of construction waste (for recovery) on-site; and
 - An outline of the waste aspects of the CEMP and / or SWMP (or equivalent).
- 34 The above mitigation measures will be summarised within **ES Volume 1, Chapter 17: Mitigation and Monitoring Schedule**.

Operational Development

- 35 During the operation of the Proposed Development, it is anticipated that any waste for recovery or waste for disposal generated from the site would be directed to active and permitted waste management sites within the LBS or London.
- 36 The key waste materials expected to be generated by the operational Proposed Development include:
- Commercial waste;
 - Organic / compostable waste;
 - Dry mixed recyclables;
 - Waste electrical and electronic equipment (WEEE) wastes;
 - Bulky waste; and
 - Residual waste.

⁹ IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment.

¹⁰ It is acknowledged that there is no longer a requirement to prepare a Site Waste Management Plan (SWMP) as part of the planning application, however discussions with the Council are ongoing as to the requirements for a waste strategy (or similar).





- 38 It is considered that operational waste arising from the Proposed Development will be **negligible**. Details of waste generated by the Proposed Development will be provided within **ES Volume 1, Chapter 4: The Proposed Development**.

Mitigation Measures

- 39 The design of the Proposed Development will ensure that there is sufficient storage and equipment / provisions (in accordance with the LBS requirements) in place to manage and direct the operational waste, expected to be generated by the Proposed Development, to the relevant storage areas provided. The design of the Proposed Development will also ensure there is sufficient space for the collection of waste to be relocated to the relevant active and permitted waste management sites.
- 40 Detailed information on the type and quantities / volumes of waste streams anticipated to be generated by the operational Proposed Development, along with how each waste stream will be managed will be set out within an Outline Waste Management Strategy (OWMS). The OWMS will also provide details on how waste will be reduced, minimised and recycled, where possible, in line with the Waste Hierarchy and the LBS's requirements. The preparation of an OWMS is likely to form a planning condition attached the planning permission (if granted).
- 41 Considering the available capacity specified within the Local Plan for waste to accommodate the apportionment targets, the available landfill void capacity and the adherence to mitigation measures pursuant to planning conditions, waste generated from the Proposed Development is not anticipated to cause strain to the borough's waste management facilities once operational. Therefore, significant adverse effects on the local waste management infrastructure and landfill capacity, resulting from the waste expected to be generated during the operation of the Proposed Development, are considered unlikely.
- 42 On the basis of the above, it is proposed to **scope out** an assessment of the Proposed Development's operational effects on waste / landfill capacity; however, the ES will set out:
- The approximate type and quantities / volumes of operational waste (for both the residential and commercial components) that are expected to be generated by the operational Proposed Development within **ES Volume 1, Chapter 4: The Proposed Development**; and
 - An outline of the OWMP (or equivalent).
- 43 The above mitigation measures will be summarised within the **ES Volume 1, Chapter 17: Mitigation and Monitoring Schedule**.

Materials

Demolition and Construction

- 44 During demolition and construction, it is anticipated that materials for constructing the Proposed Development will be sourced from the site, in terms of any 'waste for recovery'¹¹ and within the LBS and London, as far as reasonably practicable.
- 45 In accordance with IEMA's guide to Materials and Waste in EIA¹², materials are considered to be sensitive receptors and include *"physical resources that are used across the lifecycle of a development. Examples include concrete, aggregate, asphalt, bricks, ballast, mortar, glass and timber."*
- 46 Considering the extent of the Proposed Development, it is understood that the material use during the construction of the Proposed Development will be less than 1% of the National Material Demand. Therefore, the magnitude of the impacts on the materials are considered to be **negligible**.

¹¹ Defined by IEMA's guide to Materials and Waste in Environmental Impact Assessment (2020) as 'waste' materials that go through an acceptable recovery process, to lose their status as 'waste' and become materials for other uses.

¹² IEMA, (2020); Guide to Materials and Waste in Environmental Impact Assessment



Mitigation Measures

- 47 IEMA's guide to Materials and Waste in EIA refers to different types of mitigation measures to prevent or reduce adverse effects relating to materials and waste:
- 48 Primary mitigation measures: are *"an intrinsic part of the development, and do not require additional action to be taken"*¹³; for example, choosing to refurbish an existing building, rather than demolish it;
- 49 Secondary mitigation measures: are *"foreseeable actions brought out by the environmental assessment process, and that have not previously been achieved through primary and tertiary mechanisms"*¹⁴; for example, the implementation of a Procurements Strategy or Construction Environmental Management Plan (CEMP) (or equivalent) or Operational Waste Management Strategy; and
- 50 Tertiary mitigation measures: are *"those that are in place with or without the iterative EIA process"* and include *"those that will be undertaken to meet existing legislative requirements, of those that are considered standard practices used to manage commonly occurring environmental effects"*¹⁵; for example, sending waste to active and permitted waste management sites, which have to adhere to the requirements of the Environmental Permitting Regulations¹⁶, whereby carrying out certain types of activity (such as receiving waste for landfill) requires an active and permitted waste management site to hold an environmental permit to do so.
- 51 Mitigation measures (in line with the IEMA guidance set out above) will be implemented to avoid, remedy or mitigate adverse effects in terms of materials consumption during the demolition and construction and will likely include:
- Site Waste Management Plan (SWMP) will be conditioned and subsequently prepared, and submitted to the LBS, to address and control waste management during the construction period;
 - Construction Environmental Management Plan (CEMP) will be conditioned and subsequently prepared, and submitted to the LBS, which includes requirements to consider materials selection for the construction of the Proposed Development;
 - Materials sourced locally as far as reasonably practicable;
 - Reused, upcycled or recycled materials, where feasible;
 - Minimising the stockpiling of construction materials on site through the use of a 'just in time' delivery system, which provides benefits in terms of minimising the space required for storage, the potential for damage to materials (potentially resulting in materials subsequently unsuitable for their purposes), and minimises the potential for material spoiling due to adverse weather conditions;
 - The setting of waste reduction targets and waste reuse / recycling targets prior to commencing onsite works, to encourage transparency and accountability. These targets, and the waste data generated during the demolition and construction works, should be monitoring throughout the works; and
 - Other good practice management measures, including the potential reuse (off-site) of excavation materials were possible, should be implemented.
- 52 Measures such as the above shall be implemented pursuant to planning conditions. Through the implementation of mitigation measures, the consumption of materials will be undertaken sustainably and minimised where possible. Providing the measures included within the ES are enforced and adhered to via a condition, significant adverse effects on sensitive receptors, pertaining to the consumption of materials during the enabling and construction phase, are considered unlikely.
- 53 On the basis of the above, it is proposed to scope out an assessment of construction effects on materials; however, the ES will set out:
- The approximate type and quantities / volumes of materials that are anticipated to be required for the construction of the Proposed Development;
 - The sustainability credentials of materials (if known); and

¹³ IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 19).

¹⁴ IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 27).

¹⁵ IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 20).

¹⁶ The Environmental Permitting (England and Wales) Regulations 2016



- The commitment to undertaking the measures outlined above.

54 The above measures will be summarised within **ES Volume 1, Chapter 5: Demolition and Construction** and **Chapter 17: Mitigation and Monitoring Schedule**.

Completed Development

55 The materials anticipated to be required during the operation of the Proposed Development are expected to be primarily used for maintenance purposes. Given that:

- The quantities of materials to be used would be far less than that used during construction of the Proposed Development; and
- The scale and massing of the development (and so the expected maintenance required) would be typical for a mixed-use residential and commercial/business/service scheme, it is considered that significant adverse effects on materials due to the ongoing operation / use of the Proposed Development would be unlikely.

56 On the basis of the above, it is proposed to scope out an assessment of operational effects on materials.

Conclusion

57 In line with the above, it is considered that potential effects associated with waste and materials will be adequately managed throughout the lifetime of the project and significant effects are not likely. Therefore, it is proposed that waste and materials is scoped out of the EIA.

TOPIC SHEET

WATER RESOURCES, FLOOD RISK AND DRAINAGE

Introduction

It is considered that significant effects relating to water resources, flood risk and drainage are unlikely and as such this topic is **SCOPED OUT** of the EIA. The following section provides a summary of baseline conditions and clarifying why no significant effects are expected. This Topic Sheet has been prepared by RMA Environmental Ltd.

It has been undertaken with reference to the following key policy and guidance documents:

- National Planning Policy Framework (NPPF) (2023)¹ and Planning Practice Guidance (PPG) (initially issued March 2014 and updated in 2021)²;
- The London Plan (2021)³;
- The Southwark Plan (2022)⁴;
- Southwark Strategic Flood Risk Assessment (SFRA; 2017)⁵; and
- Other relevant planning policy and guidance documents.

The review has been undertaken in accordance with best practice guidance on the assessment of development projects with regard to the water environment, including that provided by the Institute of Environmental Management and Assessment (IEMA).

The impacts associated with water quality on groundwater and surface water have been covered in the Ground Conditions Topic Sheet of this scoping report.

Baseline Conditions

Flood Risk

- 1 The closest 'main river'⁶ is the Ravensbourne River which is located approximately 3.0km east of the site. The River Thames is located approximately 3.2km north of the site.
- 2 A 'lost watercourse'⁷ is located approximately 370m south of the site and known as the 'River Peck' which is culverted/ routed underground.

¹ Department for Levelling Up, Housing and Communities. (2023). *National Planning Policy Framework*

² Department for Levelling Up, Housing and Communities. (2021). *Planning Practice Guidance. Flood Risk and Coastal Change*. (Online). Available at: <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

³ Mayor of London. (2021) *The London Plan. The Spatial Development Strategy for Greater London Consolidated with Alterations Since 2011*.

⁴ London Borough of Southwark. (2022). *The Southwark Plan 2019-2036*.

⁵ London Borough of Southwark. (2017). *Strategic Flood Risk Assessment*.

⁶ Main Rivers described by the EA as the following "usually larger rivers and streams" the rest of which are described as Ordinary Watercourses.

⁷ Described as a covered channel in which water flows, typically known as a culvert.



- 3 The Environment Agency's (EA) Flood Map for Planning⁸ identifies that the site is located entirely within Flood Zone 1 (low risk). The Southwark Strategic Flood Risk Assessment (SFRA) identifies that the Thames Tidal Defence (TTD) system provides the borough with a significant standard of protection from combined fluvial and tidal flooding, up to the 1 in 1000-year event.
- 4 The EA's risk of flooding from surface water map⁹ shows that the majority of the site has a very low risk of flooding from this source, however there are isolated areas of ponding of up to high risk of flooding from this source within the south-western extent of the site.
- 5 The SFRA states that the site is located within a reservoir flood extent. The closest reservoir is located approximately 1.5km south-east and is known as Nunhead Reservoir.
- 6 The SFRA includes a figure (named Map A2 – Flooding History) showing localised groundwater flooding incidents and properties flooded by overloaded sewers. The figure shows that the site is located within a postcode area where only 1-2 properties have been flooded by overloaded sewers. In addition, there is a localised groundwater flood extent to the west of the site. However, the site is not within a groundwater flood extent according to Map A5 – Areas at risk of Flooding from Groundwater within the SFRA.

Surface Water Drainage

- 7 As defined within the SFRA, a Critical Drainage Area (CDA) is defined as “A discrete geographic area where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding during severe weather, affecting people, property or local infrastructure”.
- 8 The SFRA identified that the site is located within the East Southwark CDA. The general flow path is from south to north and flows along old watercourse of the River Peck.

Water Resources

- 9 A Phase 1 Land Contamination Desk Study Report (RMA Environmental; 2022), which includes a Groundsure Environ Insight and Geo Insight Report for the area, is included within **Annex E: Phase 1 Land Contamination Assessment** of this EIA Scoping Report and identifies that there are six active licensed groundwater abstractions within a 2km radius of the site, the closest of which is located 1.2km north of the site and is used for 'dewatering' with a maximum daily volume of 1,296m³.
- 10 There is one recorded active licenced potable abstraction within a 2km radius of the site. This is located approximately 1.9km south-east of the site and is used for 'Potable Water Supply - Direct' with a maximum daily volume of 4,546m³.
- 11 There are no records of surface water abstractions within 2km of the site.

Water Supply and Infrastructure

- 12 According to the EA's Water Stressed Areas report (2021)¹⁰, London is located in an area which is reported to suffer from 'serious water stress', i.e. the availability of mains drinking water supply is limited. Whilst it is the remit of Thames Water (and other water companies) to ensure that sufficient water supply is provided for new developments, sustainable design measures would need to be adopted to minimise the water demand of the Proposed Development.

Development Context

- 13 Sustainable Urban Drainage Systems (SuDS) will be incorporated into the design of the Proposed Development to ensure that surface water runoff is controlled, and that appropriate water quality treatment is applied to any runoff leaving the site.

⁸ Environment Agency (2021). Flood Map for Planning. (online). Available at: <https://flood-map-for-planning.service.gov.uk/>

⁹ GOV. (2019). Environment Agency 'Check for long term flood risk for an area in England'

¹⁰ Environment Agency. (2021). Water Stressed Areas – Final Classification



- 14 The design of the building will incorporate water efficiency measures and water-saving devices to reduce the water demand of the Proposed Development.

Discussion for Scoping Out

- 15 Due to the distance of the site from groundwater, potable and surface water abstractions, it is considered that the Proposed Development would not have an impact on any water supply in relation to the recorded abstractions within the area. It is therefore considered unlikely that any basement related works proposed at the site will cause significant disruption to the groundwater table that could result in water supply to local abstractions being inhibited.
- 16 As the site is currently brownfield, there will be no increase in impermeable surface areas and therefore it is unlikely that the Proposed Development will increase surface water runoff during the demolition and construction works and once complete and operational. In addition, during the demolition and construction works, the control of surface water runoff will be covered within the Construction Environmental Management Plan (CEMP). The CEMP will be submitted in support of the planning application and will specify mitigation measures to ensure that the demolition and construction works associated with the Proposed Development will not increase, or cause contamination of, surface water runoff within the site or elsewhere.
- 17 The site is located in Flood Zone 1 (low risk) and will be for its operational lifetime. The Proposed Development is classified as a major development and is larger than 1 hectare in area and therefore, in accordance with Southwark Validation Checklist for major planning applications and the NPPF, a Flood Risk Assessment (FRA) will be prepared for the Proposed Development and submitted in support of the planning application which will include the following:
 - Consultation with the Lead Local Flood Authority (LLFA) to identify any key issues in relation to flood risk;
 - Preliminary consultation with the EA regarding flood risk information for the site and surrounding area;
 - Review of the Council's Strategic Flood Risk Assessment (SFRA) to identify baseline information with regard to potential and actual sources of flood risk;
 - Review of national and local planning policies to ensure that the FRA addresses all relevant policies; and
 - Preparation of a stand-alone FRA report in accordance with the requirements of the NPPF, to include the following:
 - Details of any historical flooding events;
 - Acceptability of the proposed land use in relation to known flood zones;
 - Impacts/ benefits of any flood defences and an assessment of the effects of a breach scenario;
 - Access and egress arrangements; and
 - Climate change effects.
- 18 For the Proposed Development's operational phase, a conceptual surface water drainage strategy will be prepared and included within the FRA, which will be submitted in support of the planning application. This will ensure that surface water runoff is discharged appropriately and is compliant with target discharge rates. The London Plan states that development proposals should aim to achieve greenfield runoff rates and that drainage should be designed and implemented in ways that promote multiple benefits including water use efficiency, water quality and enhance biodiversity, urban greening, amenity and recreation.
- 19 In addition, the Department for Environment, Food & Rural Affairs' (Defra) Non-Statutory Technical Standards require that “for developments which were previously developed, the peak runoff rate from the development to any drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event must be as close as reasonable practical to the greenfield runoff rate from the development for the same rainfall event, but should never exceed the rate of discharge from the development prior to redevelopment for that event.”
- 20 The design principles set out in the surface water drainage strategy and its conclusions will be presented in the ES within **ES Volume 1, Chapter 4: The Proposed Development**.



- 21 There is the potential for increased water demand and wastewater flows during both the demolition and construction works and once the Proposed Development is complete and operational. Consultation will be undertaken with Thames Water and, if necessary, infrastructure improvements may be required to supply the Proposed Development. Consultation with Thames Water and details of water efficiency measures to reduce water usage will be summarised within the ES. For the Proposed Development, water demand is considered to have a target consumption of 105 litres or less per person per day (l/p/d). This is the requirement within The London Plan 'Policy SI 5 Water Infrastructure'.
- 22 A foul drainage strategy will be prepared and submitted in support of the planning application. This will include consultation with Thames Water at the outset of the project to determine whether there is capacity within the local foul sewerage network to supply the Proposed Development and, if necessary, what infrastructure improvements are required. The design principles set out in the foul drainage strategy and its conclusions will be presented in the ES (in **ES Volume 1, Chapter 4: The Proposed Development**).

Conclusion

- 23 As the planning application will be supported by an FRA, conceptual surface water, foul drainage strategy and a CEMP, it is considered that a Water Resources, Flood Risk and Drainage ES Chapter can be scoped out of the EIA as any significant effects are unlikely. An assessment of the risk of contamination of controlled waters (i.e. groundwater and surface water) is discussed in the Ground Conditions Topic Sheet of this Scoping Report.

TOPIC SHEET

WIND MICROCLIMATE

Introduction

- 1 It is considered that there is the potential for likely significant effects relating to the wind microclimate and so this topic shall be scoped into the EIA.
- 2 The assessment shall quantify potential changes to the wind microclimate due to the Proposed Development by carrying out wind tunnel testing. The testing shall identify if there are significant increases in wind speeds arising from the introduction of the Proposed Development to the site.
- 3 The ES wind microclimate assessment shall:
 - Define the existing wind microclimate conditions (baseline conditions);
 - Identify relevant receptors areas for wind microclimate assessment.
 - Assess:
 - a. the potential for wind microclimate impacts throughout the demolition and construction works, during phasing, and upon completion of the development.
 - b. the likely significant wind effects at the site and surrounds.
 - c. any required mitigation or monitoring to address significant adverse wind microclimate effects.
 - d. the potential for cumulative wind microclimate effects.

Baseline Conditions

Current Baseline Conditions

- 4 The prevailing winds for the London region are south-westerly. The surrounding context is predominately comprised of low to mid rise buildings and there are no tall buildings within the local area around the site. The wind conditions at the open site are likely to be safe and suitable for strolling during the windiest season (normally winter).
- 5 The baseline conditions across the Existing Site and the surroundings will be defined using wind tunnel testing to provide a detailed, quantitative assessment. Wind tunnel testing is one of the most well-established and robust means of assessing the pedestrian wind microclimate. Such testing allows the pedestrian level wind microclimate at and surrounding the site to be quantified and classified in accordance with the Lawson Criteria, which are well-established in the UK.
- 6 Mean and peak wind speeds will be determined for the worst-case and individual seasons. The wind conditions will be assessed for 36 wind directions (in 10° increments) within a 500m radius of the site. This is considered a large enough scale to ensure all wind effects are captured.
- 7 The wind tunnel model will include relevant buildings and other topographical features up to a 500m radius from the centre of the site. The existing baseline will comprise of some low-rise buildings on the site. The baseline