

Elephant Park H1 Development

# Environmental Statement, Volume 3 – Appendices

May 2021

Prepared by Avison Young

**Prepared By: Kirsty Rimondi and Hannah Fiszpan**

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**For and on behalf of Avison Young**

## **Volume 3 - Contents**

Appendix 2.1:	EIA Scoping Report
Appendix 2.2:	EIA Scoping Meeting Minutes
Appendix 2.3:	Consultation to Agree Townscape Assessment Viewpoints
Appendix 2.4:	Updated Detailed Phasing Plan
Appendix 5.1:	Detailed Planning Application Drawings
Appendix 6.1:	Construction Environmental Management Plan
Appendix 8.1:	Legislative and Planning Policy Context
Appendix 8.2:	EPUK & IAQM Planning for Air Quality Guidance
Appendix 8.3:	Professional Experience
Appendix 8.4:	Modelling Methodology
Appendix 8.5:	London Vehicle Fleet Projections
Appendix 8.6:	Air Quality Neutral Methodology
Appendix 8.7:	Glossary.
Appendix 9.1:	Legislative and Planning Policy Context
Appendix 9.2:	Wind Microclimate Technical Report
Appendix 10.1:	Daylight and Sunlight Assessment
Appendix 10.2:	Overshadowing Assessment
Appendix 10.3:	Solar Glare Assessment
Appendix 10.4:	Light Pollution Assessment
Appendix 11.1:	Legislation, Policy and Guidance
Appendix 11.2:	ICE Carbon Coefficients and Calculations
Appendix 11.3:	Construction Traffic Data
Appendix 11.4:	Extract from Energy Statement
Appendix 11.5:	Extract from London Atmospheric Emissions Inventory

# Appendix 2.1

## EIA Scoping Report

# **Environmental Impact Assessment (EIA) Scoping Report**

## **Elephant Park Plot H1, Elephant and Castle, Southwark**

07 December 2020

## Contents

1.	Introduction .....	1
2.	An Introduction to EIA, the ES and the ES Scoping Process.....	3
3.	The Applicant’s EIA Team.....	5
4.	The Site and its Context .....	11
5.	Overview of the Development .....	20
6.	The Broad EIA Methodology .....	25
7.	Likely Significant Effects to be Addressed in the ES.....	33
8.	Insignificant Effects to be Scoped out of the ES .....	52
9.	Proposed Structure of the ES .....	67

## Appendices

- Appendix I Indicative Plot Construction Programme
- Appendix II Proposed Views
- Appendix III H1 Development Traffic Flows
- Appendix IV Preliminary Ecological Appraisal

Prepared By: Kirsty Rimondi and Hannah Fiszpan

Status: Version 2

Date: 07 December 2020

For and on behalf of Avison Young (UK) Limited

# 1. Introduction

## Background

- 1.1 In March 2013 Outline Planning Permission ('OPP') (reference: 12/AP/1092) was granted for a residential-led development known as Elephant Park (formerly referred to as the 'Heygate Masterplan'). The subject area of the OPP comprised an area of land occupying 9.71 hectares (the 'Masterplan Site'). At the time of achieving the OPP, the Masterplan Site comprised the Heygate Estate located to the west of Elephant and Castle Railway Station. The OPP comprised Plots H1 to H7, H10, H11a, H11b, H12, H13, PAV1 and a new park at its centre. Reserved Matters Applications (RMA) have been submitted and approved for all but Plot H1. As such, the 'Approved Development' comprises detailed permission for Plots H2 to H7, H10, H11a, H11b, H12, H13, and PAV1 and outline permission for Plot H1.
- 1.2 The Elephant Park OPP was subject to an Environmental Impact Assessment (EIA) and, therefore, was accompanied by an Environmental Statement (the 'March 2012 ES') and subsequently an ES Addendum (the 'September 2012 ES Addendum'). In addition, an Updated ES dated August 2020 (the 'August 2020 ES') was submitted in support of the submission of an Updated Detailed Phasing Plan for Elephant Park.
- 1.3 Lendlease (Elephant and Castle) Limited (the Applicant) intends to submit a stand-alone full 'drop-in' planning application (the 'Planning Application') in relation to land comprising Plot H1 of the OPP for an office-led building (the 'H1 Development'), as an alternative to developing Plot H1 under the OPP. The H1 Development would become part of the Elephant Park development alongside the remainder of the Approved Development.

## The Purpose of this Report

- 1.4 This report accompanies a written request for an Environmental Impact Assessment (EIA) Scoping Opinion from the London Borough of Southwark (LBS) pursuant to Regulation 15 of the 'Town and Country Planning (Environmental Impact Assessment) Regulations, 2017'<sup>1</sup> (the 'EIA Regulations'). The purpose of this report is to inform the request for an EIA Scoping Opinion in respect of the 'H1 Development', Elephant and Castle, Southwark (the Site) (see **Figure 1** in **Section 4**).
- 1.5 This report has been prepared by Avison Young on behalf of the Applicant. In accordance with Regulation 15(2) of the EIA Regulations this report provides:
- A plan sufficient to identify the land subject to the H1 Development (the Site) (refer to **Section 4**).
  - A brief description of the nature and purpose of the H1 Development (refer to **Section 5**).
  - An explanation of the likely significant effects of the H1 Development on the environment (refer to **Section 7**).

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

- Other relevant information the Applicant wishes to provide (refer to **Sections 1 - 3**, inclusive, **Section 6**, and **Sections 8 - 9** inclusive).

## 2. An Introduction to EIA, the ES and the ES Scoping Process

### The EIA

- 2.1 Underpinned by the aforementioned EIA Regulations, EIA is a formal process whereby the likely significant environmental effects of a project are identified, predicted and evaluated. The main purpose of the EIA process is to avoid and / or reduce significant environmental effects of a project via an iterative design process and to identify the likely residual environmental effects of a project so that they can be understood by planning decision makers and stakeholders.
- 2.2 The stand-alone Planning Application in relation to the H1 Development will be subject to EIA.
- 2.3 The Applicant has commissioned Avison Young as Lead EIA Consultant for the H1 Development. Accordingly, Avison Young's role is to lead the EIA process and to prepare an ES for the H1 Development.
- 2.4 Whilst the ES will be provided to accompany the H1 Development, it is recognised that the EIA Regulations require the identification of a project, which in this case is overall Elephant Park development including the H1 Development. Therefore, the EIA and ES will assess the H1 Development in the context of a 'likely future baseline' which will include all other elements of the Approved Development (i.e. the Approved Development except for Plot H1 in its outline consented form) as being completed and operational. **Section 4** and **Section 6** provides further details in relation to this approach.

### The ES

- 2.5 Applications for EIA development must be accompanied by an ES. The ES must contain all relevant information set out within Regulations 18(3) and, where relevant, Schedule 4 of the EIA Regulations.

### Scoping the ES

- 2.6 The EIA Regulations are clear in their intent which is to ensure only the "...likely significant environmental effects..." of a project are identified within an ES. This is echoed within the online Planning Practice Guidance (PPG)<sup>2</sup> which states:

*"Whilst every ES should provide a full factual description of the development, the emphasis should be on the 'main' or 'significant, environmental effects to which a development is likely to give rise. The ES should be proportionate and not be any longer than is necessary to assess properly those effects. Where, for example, only one environmental factor is likely to be significantly affected, the assessment should focus on that issue only. Impacts which have little or no significance*

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2 <https://www.gov.uk/guidance/environmental-impact-assessment#Preparing-an-Environmental-Statement1>

*for the particular development in question will need only very brief treatment to indicate that their possible relevance has been considered."*

2.7 In view of the above, scoping of the ES refers to the process of identifying the significant environmental effects which are likely to arise from a project. In this way, topics to be 'scoped into' and 'scoped out of' an ES can be identified and agreed with the relevant determining authority by way of an EIA Scoping Opinion (to be prepared by the relevant determining authority).

2.8 With regard to EIA Scoping Opinions, the online PPG further notes the need to be pragmatic:

*"...the opinion should be proportionate, tailored to the specific characteristics of the development and the main environmental features likely to be significantly affected."*

2.9 As noted in **Section 1**, this report has been prepared to inform the request for an EIA Scoping Opinion in respect of the H1 Development at the Site.

### 3. The Applicant's EIA Team

3.1 Regulation 18(5) of the EIA Regulations states:

*"In order to ensure the completeness and quality of the ES: (a) the developer must ensure that the ES is prepared by competent experts; and (b) the ES must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts."*

3.2 Although this EIA Scoping Report is not an ES, for completeness, the Applicant's EIA Team and relevant credentials are set out within **Table 1**. All EIA Team members have contributed to the preparation of this EIA Scoping Report.

**Table 1: The Applicant's EIA Team**

Name and Professional Title	Organisation	Project Role	Qualification(s)	Statement of Relevant Experience
Hannah Fiszpan, Director.	Avison Young.	EIA Project Director.	BSc (Hons). Practitioner Member of the Institute of Environmental Assessment and Management (IEMA).	19 years' experience managing, co-ordinating and directing EIAs, and preparing ESs for predominantly property and urban regeneration projects.
Kirsty Rimondi, Executive Consultant.	Avison Young.	EIA Project Manager.	BA (Hons) MSc. Member of the Institution of Environmental Science (MIEnvSc). Member of the Institute of Air Quality Management (MIAQM).	20 years' experience managing, co-ordinating and directing EIAs, and preparing ESs for predominantly property and urban regeneration projects.
Alice White, Senior Consultant.	Avison Young.	EIA Project Assistant.	BSc (Hons). MSc. Graduate Member of IEMA.	Over three years' experience co-ordinating and assisting with EIAs and preparing ESs for predominantly property and urban regeneration projects.
Ellie Evans, Partner.	Volterra Partners.	Socio-economics Project Director.	BA (Hons) Economics	Over 15 years' experience managing, co-ordinating and directing socio-economic

Name and Professional Title	Organisation	Project Role	Qualification(s)	Statement of Relevant Experience
			Member of the Institute of Economic Development.	impact assessments, and preparing ES chapters for commercial, residential and mixed-use property, urban regeneration projects.
Luke Thurley, Senior Consultant	Volterra Partners	Socio-economics Project Manager.	Bsc (Hons) Economics MRes Economics	Three years' experience managing, co-ordinating and preparing socio-economic assessments across a wide range of use classes, with a key focus on central London boroughs.
Elizabeth Bamford, Consultant.	Volterra Partners.	Socio-economics Project Lead.	BA (Hons)	Two years' experience co-ordinating and undertaking socio-economic assessments, across a wide range of use classes, with a key focus on central London boroughs.
Louise Newman, Director.	Tavenor Consultancy.	Townscape and Visual Consultant.	BA (Hons), DipArch, Architect.	Nine years' experience in the preparation of townscape, visual and built heritage assessments for projects across London including complex masterplans, tall buildings and interventions in sensitive historic environments.
Robert Elston, Head of Project Delivery	Cityscape Digital	Accurate Visual Representation.	BA Hons, interior design and Architecture	Over eight years' experience in Architectural Visualisation.
Anna Perela, Head of Planning.	Cityscape Digital	Accurate Visual Representations.	Member of Architects Registration Board Chartered Member RIBA	Over 10 years' experience in Architectural Visualisations
Laurence Caird, Associate Director	Air Quality Consultants Ltd (AQC).	Air Quality and Greenhouse Gas	BSc (Hons). MEarthSci.	Several years' experience in the field of air quality, GHG footprints and climate change.

Name and Professional Title	Organisation	Project Role	Qualification(s)	Statement of Relevant Experience
		(GHG) Project Director.	CSci (Chartered Scientist). Member of the Institute of Environmental Sciences (MIEnvSc). Member of the Institute of Air Quality Management (MIAQM).	Laurence has undertaken air quality assessment and developed GHG footprints for a range of projects including large-scale mixed-use urban developments, industrial sites, airport expansion projects and airspace change proposals.
Guido Pellizzaro, Associate Director.	AQC.	Air Quality and GHG Project Manager.	BSc (Hons). MIAQM. MIEnvSc. Practitioner Member of the Institute of Environmental Assessment and Management (IEMA).	Guido's main experience relates to managing and delivering air quality and GHG assessments for major planning applications and EIA development.
Jack Buckley, Consultant.	AQC.	Air Quality and GHG Project Consultant.	BSc (Hons). MSc. Associate Member of the Institute of Environmental Sciences (AMIEEnvSc). Associate Member of the Institute of Air Quality Management (AMIAQM).	Jack Buckley has undertaken numerous air quality and greenhouse gas assessments for a range of development inside and outside of London. He has completed a number of air quality assessment for large scale mixed-use developments throughout Greater London. Jack also has further experience of assessing carbon, climate resilience and in combination climate change impacts.
Krishan Jayyaratnam, Senior Engineer.	RWDI.	Senior Project Engineer/ Engineering Team Leader.	C.Eng MIMechE (Member of the Institution of Mechanical Engineers).	Six years' experience in wind microclimate consultancy and mitigation design guidance for several high-rise developments and

Name and Professional Title	Organisation	Project Role	Qualification(s)	Statement of Relevant Experience
			M.Eng – Aeronautics and Astronautics.	masterplans specifically in London and throughout the UK.
Lotte Tobermann	GIA	Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare EIA Coordinator	BA, MSC, Member of the Institute of Environmental Assessment and Management (IEMA).	Over two years' experience working on large scale EIA projects, coordinating and preparing Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution EIA scoping reports and ES chapters.
Jacopo Francisconi	GIA	Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare Senior Consultant	MSc ARB	Over four years' experience supporting developers' and architects' vision by optimising the quality of daylight and sunlight amenity, as well as working on a number of large scale EIA projects in relation to Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution.
Natalie Maynard, Associate.	Buro Happold	ES Transport Project Manager	HNC Civil Engineering Member of the Chartered Institution of Highways and Transportation (MCIHT).	Over 20 years' experience providing transport planning consultancy advice to private sector development planning projects in the UK, including the management and co-ordination of Transport Assessments and ES Transport Chapters.
Richard Evans, Senior Transport Consultant	Buro Happold	Project Transport Consultant	MEng. MSc. Member of the Chartered Institution of Highways and Transportation (MCIHT)	Nine years' experience in transport planning for a range of projects in the UK including the preparation of Transport Assessments and traffic data for EIAs.

Name and Professional Title	Organisation	Project Role	Qualification(s)	Statement of Relevant Experience
Stuart Berry, Senior Consultant	Entran Ltd	EIA Project Consultant. Noise & Vibration	BSc (Hons) MSc Member of the Institute of Acoustics (MIOA)	8 years' experience in conducting environmental noise and vibration impact assessments for a range of project types
Amber Perrett, Senior Ecologist	Tyler Grange	Ecology.	BSc (Hons) Associate member of CIEEM	Over five years' experience of preparing a broad range of ecology deliverables including preliminary ecological appraisal and reports to inform habitats regulations assessment.
Nathan Jenkinson, Associate Ecologist	Tyler Grange	Ecology.	BSc (Hons) MSc Full member of CIEEM	Over five years' experience of project management and preparing a broad range of ecology deliverables including reports to inform habitats regulations assessment
Cathy Cooke, Director	WYG	Ground Conditions	BSc (Hons), MSc. CEnv. Member of the Institution of Environmental Science (MIEnvSc), MIEMA.	22 years' experience assessing, investigating, remediating and mitigating contaminated land and undertaking EIAs.
Rob Bourn, Managing Director	Orion Heritage.	Archaeology.	BA (Hons) MA. Practitioner Member of the Chartered Institute of Archaeologists (CIfA).	25 years' experience undertaking heritage related assessments and heritage EIA assessments.
Dr Rob Murdock, Director.	RMA Environmental Ltd.	Flood Risk and Drainage Consultant.	PhD BSc (Hons) IEMA Member	Over 25 years of experience in the environmental industry including Flood Risk Assessments (FRAs), surface water drainage strategies and water quality impact

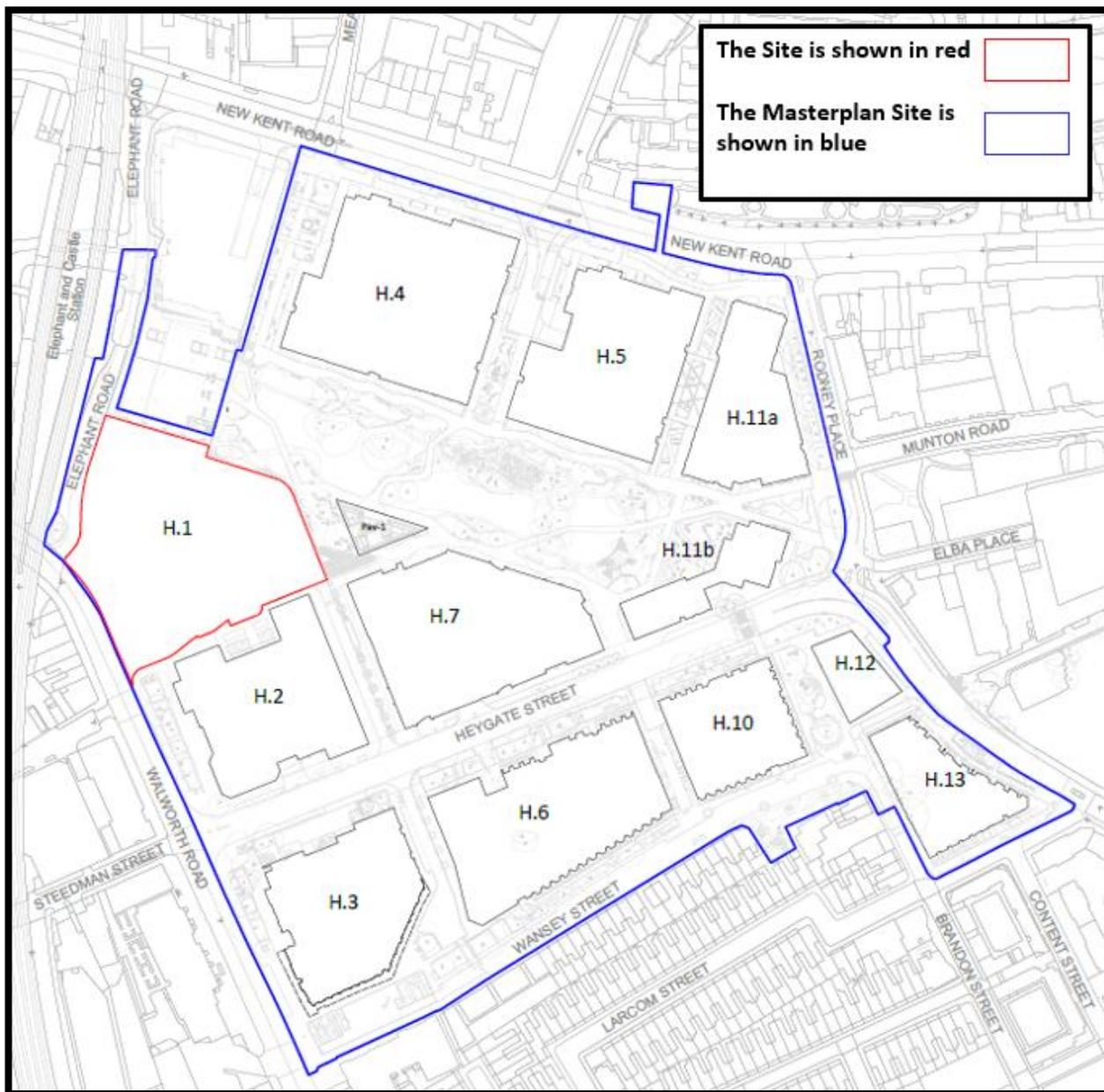
Name and Professional Title	Organisation	Project Role	Qualification(s)	Statement of Relevant Experience
Melissa Seymour, Environmental Consultant	RMA Environmental Ltd.	Flood Risk and Drainage Consultant.	BSc (Hons). Graduate Member of IEMA.	assessments including EIA on a variety of development projects in the UK and abroad.  Over three years' experience providing water resources, flood risk and drainage EIA scoping input, ES Chapters, FRAs and surface water drainage strategies for residential and commercial developments in the UK.

## 4. The Site and its Context

### Overview of the Site and Masterplan Site

4.1 The Site and the Masterplan Site, are located within the administrative boundary of LBS. As shown in **Figure 1** the Site is located on the western edge of the Masterplan Site.

**Figure 1: The Site and Masterplan Site**



4.2 The Site comprises an area of 0.77 ha and is bound by:

- Elephant Road and Walworth Road (A215) to the north-west and south-west respectively.

- Plot H2 (complete and occupied) of the Approved Development to the southeast which comprises predominantly residential accommodation, with retail and food and beverage uses at ground floor.
- A pavilion (PAV1, currently under construction) and the new park (under construction) of the Approved Development to the northeast.
- Castle Square to the north.

4.3 The Masterplan Site comprises an area of 9.71 ha and is bound by:

- New Kent Road (A201) to the north.
- Rodney Place and Rodney Road to the east.
- Wansey Street to the south.
- Walworth Road (A215) and Elephant Road to the west.

## A Brief History of the Site and Masterplan Site

- 4.4 The Heygate Estate was built on the site of Victorian tenements damaged and destroyed by World War Two (WWII) bombing. Following WWII, the London County Council (LCC) purchased the Masterplan Site with the intention for residential-led redevelopment, to include the Heygate Estate. Rebuilding began in the 1960's and was completed in 1974. However, due to the dissolution of the LCC prior to the completion, ownership of the Heygate Estate was passed on to LBS. The Heygate Estate, when fully operational, provided in the region of 1,100 residential units across several buildings up to 12 storeys in height. The Masterplan Site also comprised garages, play areas and open space, a petrol station, a small number of retail units and Crossway Church.
- 4.5 In the late 1990's and early 2000's, a number of options and studies were commissioned for the improvement of the Masterplan Site, predominantly focussing on the viability of either the refurbishment of the existing buildings or complete redevelopment of the Masterplan Site. The need for this arose from the fact the original concept for the Masterplan Site was never fully realised, resulting in the design of some elements of the estate facilitating crime and antisocial behaviour, together with wider and significant signs of 'wear and tear'. As such, following years of master planning for the Masterplan Site, the decant and demolition of the Masterplan Site began in 2007 to make way for the redevelopment of the Masterplan Site.
- 4.6 As outlined in **Section 1**, an OPP was approved in 2013, for the residential-led redevelopment of the Masterplan Site (planning application reference: 12/AP/1092). In addition, and again, with reference to **Section 1**, various RMAs have been submitted and approved for all but Plot H1. As such, the Approved Development comprises detailed permission for Plots H2 to H7, H10, H11a, H11b, H12, H13, PAV1 and outline permission for Plot H1.
- 4.7 Although construction works for the majority of the 'development plots' of the Approved Development have commenced or are completed and operational (refer to later in this Section), construction works have not yet commences on Plot H1 (the Site). However, in 2014, the western portion of the Site was the focus of a temporary use application (planning application reference: 13/AP/2927), referred to as the 'Artworks Elephant'. The temporary

(‘interim’) use comprised a community led space for local start-ups and small businesses but ceased to operate at the end of 2018.

## Predominant Existing Land Uses on the Site and Masterplan Site

- 4.8 As Outlined in **Section 1** the Masterplan Site is currently undergoing redevelopment in accordance with the Approved Development. **Figure 1** shows the layout of both the Site and the Masterplan Site.
- 4.9 The Site is void of permanent structures but currently accommodates a modular building for Masterplan Site welfare. This is associated with the on-going implementation of the Approved Development, including construction set-down and a small area of temporary public realm on south side of the Site, used as a meadow, pathways and seating areas.
- 4.10 In relation to the Masterplan Site, at the time of writing:
- Construction works are complete (and buildings are occupied) for Plots H2, H3, H6, H10, H12 and H13 of the Approved Development.
  - Construction is ongoing for Plots H4 and H5 including associated public realm, Plot H11a and PAV1.
  - Above ground work has not yet commenced in relation to Plots H7 and H11b, which are currently used for various temporary purposes including site offices, a construction compound and temporary landscaping.

## Predominant Existing Land Uses Surrounding the Masterplan Site

- 4.11 Existing land uses surrounding the Masterplan Site as are follows:
- Immediately to the north of the Masterplan Site, fronting New Kent Road, land uses are predominantly residential, comprising multi-storey buildings including Albert Barnes House, St. Matthews Court, Taven Court and Cartwright House. St. Mathews Church is also located to the northwest of the Masterplan Site, at the corner of Meadow Row and New Kent Road. Rachel McMillan College Annexe of South Bank University is located at the corner of Falmouth Road and New Kent Road.
  - To the east of the Masterplan Site, land uses are more varied. The dis-used Crown and Anchor Public House is located at the corner of New Kent Road and Rodney Place, which is now boarded up. Immediately adjacent to the public house there is an industrial unit, currently comprising the Drawing Room (part of Tannery Arts Ltd) which can be hired out as an exhibition space. There are also residential flats and green open space, Victory Community Park, fronting Rodney Road. Victory Primary School is located at the junction of Rodney Road and Heygate Place. Trafalgar Place (formerly referred to as ‘Phase 1 of the Heygate Regeneration’ and now complete and operational), on a site bounded by Rodney Road, Victory Place and Balfour Street, is located beyond the southernmost tip of the eastern boundary of the Masterplan Site.
  - Beyond the south-eastern boundary of the Masterplan Site the land use is predominantly residential with three storey houses and four to six storey residential buildings. Town Hall on Walworth Road is located directly

to the south of the Masterplan Site, at the corner of Wansey Street and Walworth Road. Newington Art Academy London is also located on Walworth Road beyond the south-western boundary.

- Along the south-western boundary of the Masterplan Site there is a mix of land uses including three to four storey buildings with retail on the ground floor and residential on the upper storeys. There is also a multi-storey residential building, Julian Markham House, providing student accommodation (Unite Students) with retail use on the ground floor. Retail, residential, hotel and office uses along Walworth Road also include Kwik Fit, Staysafe London, Eurotraveller Hotel Express and Dashwood Studios. The Mosaic Multicultural Church is also located on the south-western boundary of the Masterplan Site.
- To the west of the Masterplan Site, fronting Elephant Road, is the now closed Elephant and Castle Shopping Centre. Beyond the western boundary there are a number of retail uses including restaurants, a café, a night club and vehicle servicing companies accommodated in the railway arches. Elephant and Castle Overground Railway Station and associated railway lines are also located beyond the western boundary of the Masterplan Site. The Elephant and Castle Shopping Centre closed in September 2020, making way for a mixed-use redevelopment incorporating retail, leisure, residential and student accommodation (planning application reference: 16-AP-4458). However, at the time of writing, planning application reference: 16-AP-4458 had not commenced.

4.12 The primary land use surrounding the Masterplan Site is residential. Beyond the Masterplan Site boundary there are housing estates to the north, south and southwest, including the Draper, Newington and Alberta Housing Estates to the southwest, the Peabody Estate, Nelson and Browning Estates to the south, and Rockingham Estate to the north. Strata, which is 43 storeys in height, is also located beyond the western boundary of the Masterplan Site.

4.13 With regard to transport infrastructure within proximity of the Masterplan Site, two junctions (hereafter referred to as the 'Northern Roundabout' and the 'Southern Junction') are located to the north-west and south-west of the Site respectively. A pedestrian subway system is located beneath the Northern Roundabout, and the adjacent road. However, the Southern Junction includes the provision of surface pedestrian crossings. There is a raised railway viaduct located to the west of the Masterplan Site beyond Elephant Road.

4.14 Public transport facilities within the vicinity of the Masterplan Site include the following services:

- Southeastern and Thameslink services from Elephant and Castle Station located to the west of the Masterplan Site utilising the aforementioned raised railway viaduct. Destinations include Sevenoaks, London Blackfriars, Sutton and St Albans City.
- Northern Line and Bakerloo Line London Underground Limited (LUL) from Elephant and Castle London Underground Station with entrances located to the west of the Masterplan Site in two locations north and south of the Northern Roundabout.
- Numerous bus services.
- Santander cycle hire docking stations to the west of the Masterplan Site near the Southern Junction.

- 4.15 There are a number of retail and leisure facilities within the vicinity of the Masterplan Site. Retail uses, including pubs, restaurants, a night club and takeaway establishments are located to the south and north of the Masterplan Site, primarily on Walworth Road, Elephant Road in the railway arches and New Kent Road. Victory Park, located to the east of the Masterplan Site, also provides play space.
- 4.16 Education facilities surrounding the Masterplan Site include:
- Victory School to the east.
  - St. John's Walworth Church of England Primary School to the south.
  - Ark Globe academy to the north.
  - Crampton School to the south-west.
  - London College of Communication to the north-west.
  - London South Bank University to the north-west.
  - Notre Dame Roman Catholic Girls' School to the north-west.
- 4.17 There are light industrial uses, car parking, cafes, restaurants and a club within the arches beneath the railway viaduct to the west of the Masterplan Site, beyond Elephant Road. There are also office and business uses, including the Department of Health located within Skipton House to the north-east of the Masterplan Site.

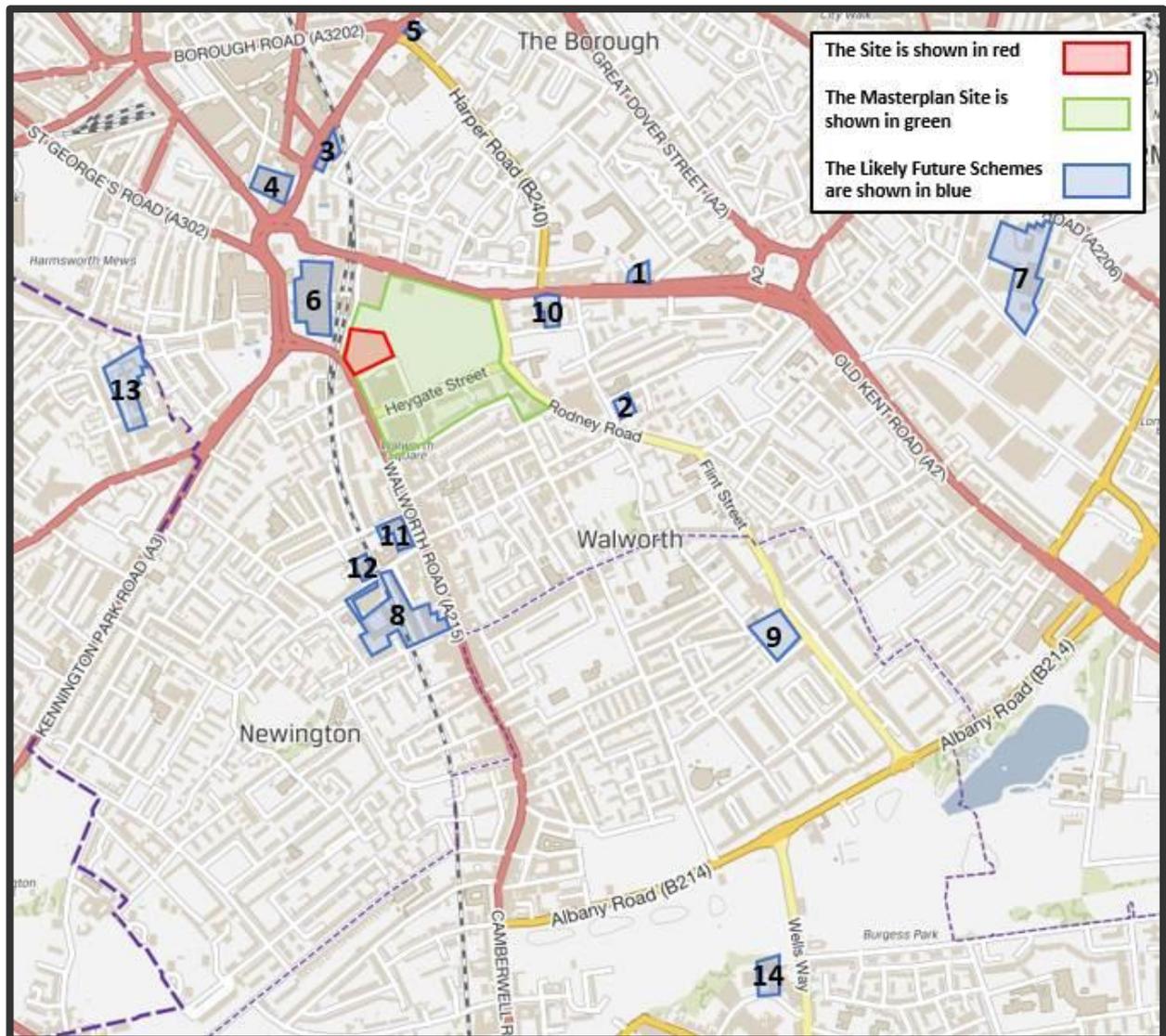
## Likely Future Land Uses within the Site and Masterplan Site

- 4.18 The H1 Development EIA and ES will reasonably assume that the Updated Detailed Phasing Plan for the Approved Development as considered in the August 2020 ES, will be approved. The proposed plot construction programme associated with the Updated Detailed Phasing Plan, presented in **Appendix I**, indicates that all other elements of the Approved Development will be complete and operational before Plot H1 is completed. In addition, as noted earlier, Plots H2, H3, H6, H10, H12 and H13 are already built out, completed and occupied, and construction has commenced in relation to Plots H4, H5, H11a and PAV1.
- 4.19 In view of the above, it is considered reasonable for the H1 Development EIA process to assess the likely significant effects of the H1 Planning Application in the context of a 'likely future baseline'. This likely future baseline will reasonably assume the completion and occupation of all other elements of the Approved Development ((i.e. the Approved Development except for Plot H1 in its outline consented form). Further detail regarding this approach and why it is considered reasonable to apply is provided within **Section 6**.
- 4.20 The likely future land uses within the Site (in the absence of the Plot H1 Development) are assumed to be the same as those currently existing within the Site as outlined above. That is, site offices, a construction compound and temporary landscaping.
- 4.21 The likely future land uses within the remainder of the Approved Development include residential, retail, business, community and cultural, and leisure uses, an energy centre and open spaces. **Section 5** provides further detail.

## Likely Future Land Uses Surrounding the Masterplan Site

4.22 A review of the August 2020 ES, in addition to a search of online databases<sup>3</sup> and planning portals<sup>4</sup>, was undertaken to identify significant schemes within 1.5 km of the Masterplan Site, which represent likely future land uses surrounding the Masterplan Site. **Figure 2** and **Table 2** show the results.

**Figure 2: Likely Future Schemes Within 1.5 km of the Masterplan Site**



<sup>3</sup> <https://maps.london.gov.uk/map/?ltd>

<sup>4</sup> <https://www.southwark.gov.uk/planning-and-building-control/planning-applications/planning-register-search-for-view-and-comment-on-planning-applications>

**Table 2: Likely Future Schemes within 1.5 km of the Masterplan Site**

Planning Application Reference and Address	Location Relative to the Masterplan Site	Description	Status
Ref: 19/AP/5389. 221 New Kent Road.	295 m east.  Labelled as '1' in <b>Figure 2</b> .	Demolition of existing warehouse building and erection of a part t, part 6 and part 9 storey building providing 200 hotel rooms (Class C1) and 1,354sqm of work / maker space at ground floor (and mezzanine) (Flexible Class B1) as well as ancillary café / restaurant and bar facilities (Class A3 / A4), along with associated landscaping, servicing yard and access works.	Submitted 25 <sup>th</sup> September 2019 and currently being determined.
Ref: 19/AP/1506. Salisbury Estate Car Park, Balfour Street, London, SE17 1PA.	175 m south-east.  Labelled as '2' in <b>Figure 2</b> .	Redevelopment of the existing car park to provide 26 residential units in a 5 storey block with maximum height of 21.8m AOD (5 x 3 bed 5 person flats, 9 x 2 bed four person flats & 9 x 1 bed 2 person flats, 2 x 2 bed wheelchair units and 1 x 1 bedroom wheelchair unit) together with new private amenity space located within a rear courtyard as well as improving the landscaping of the existing pedestrian link between Chatham Street and the open green space to the south of the site for public use. Two disabled parking spaces to be provided to the north of the site accessed off Chatham Street.	Approved: 12/11/2019.
Ref: 19/AP/0750. 5-9 Rockingham Street & 2-4 Tiverton Street, SE1 6PF.	300 m north-west.  Labelled as '3' in <b>Figure 2</b> .	Demolition of existing buildings and erection of a 21-storey building (max height 70.665m AOD) with basement and associated roof plant to provide 6,042.3sqm (GIA) of new commercial floor space and redevelopment of 3 railway arches to provide 340.1sqm of flexible commercial space (A1, B1, D1, D2) with associated cycle parking storage, waste / recycling stores and new public realm.	Approved: 31/01/2020.
Ref: 18/AP/4194. Skipton House, 80 London Road, London, SE1 6LH.	240 m north-west.  Labelled as '4' in <b>Figure 2</b> .	Part retention, part demolition, reconfiguration and re-cladding of existing building and extension to create six additional storeys to accommodate 41,750sqm office space (Use Class B1) at upper floor levels, a 780sqm gym (Use Class D2) and 993sqm flexible retail/commercial uses (Use Class A1/A2/A3) at ground floor level with associated cycle parking, landscaping, ancillary servicing and plant and all associated works.	Submitted on 24 <sup>th</sup> December 2018 and currently being determined.
Ref: 18/AP/0657. Land At 19 – 21 & 23 Harper Road, 325 Borough High Street & 1-5 & 7-11 Newington Causeway, London, SE1 6AW,	500 m north.  Labelled as '5' in <b>Figure 2</b> .	Demolition of existing buildings and redevelopment to provide construction of a part 5, part 7, part 8 and part 13 building a mixed-use development comprising 328 hotel rooms (Class C1) 20 no. residential dwellings (Class C3), offices, workspace and works.	Approved: 03/06/2020.
Ref: 16/AP/4458. Shopping Centre Site Elephant And Castle 26, 28, 30 & 32 New Kent Road, Arches 6 & 7 Elephant Road, * London College Of Communications, London SE1	70 m west..  Labelled as '6' in <b>Figure 2</b> .	Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys (with a maximum building height of 124.5m AOD) above multilevel and single basements, to provide a range of uses including 979 residential units (use class C3), retail (use Class A1-A4), office (Use Class B1), Education (use class D1), assembly and leisure (use class D2) and a new station entrance and station box for use as a London underground operational railway station; means of access, public realm and landscaping works, parking and cycle	Approved: 10/01/2019 (Awaiting ruling following judicial review).

Planning Application Reference and Address	Location Relative to the Masterplan Site	Description	Status
		storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures. In the Council's opinion the proposal may affect the setting of the following listed buildings and conservation areas: Metro Central Heights, Newington Causeway; Metropolitan Tabernacle, Newington Butts; Michael Faraday Memorial, Elephant and Castle; the Imperial War Museum, St George's Road; and the Obelisk at St George's Circus. Elliot's Row; St George's Circus and West Square Conservation Areas and the listed buildings therein, and the Walcot Square Conservation Area in Lambeth.	
Ref: 15/AP/2474. Rich Industrial Estate, Crimscott Street, London, SE1 5TE & Willow Walk, London, SE1.	1.3 km east.  Labelled as '7' in <b>Figure 2</b> .	Demolition of four existing buildings and electricity substation and the development of a phased mixed-use scheme ranging from 3-9 storeys plus basements (maximum height 34.03m AOD) comprising a series of new buildings and retained / refurbished / extended buildings to provide a total of 19,468sqm (GIA) of commercial, retail, art gallery and storage floorspace (Use Classes A1, A2, A3, B1, B8 and D1) and 406 residential units (Use Class C3) plus associated highway and public realm works, landscaping, car and cycle parking, infrastructure works and associated works.	Approved: 07/12/2017 (Under construction).
Ref: 15/AP/1062 Manor Place Depot Site, 17-21 & 33, Manor Place, SE17	260 m south.  Labelled as '8' in <b>Figure 2</b> .	Demolition and redevelopment to provide 270 residential units (Class C3) within new buildings ranging from 2 to 7 storeys, a refurbished 33 Manor Place (Grade II listed) and 17-21 Manor Place and 3,730sqm (GEA) of commercial floorspace, comprising 1,476sqm (Classes A1 / A2 / A3 / B1 / D1 / D2) within 9 refurbished railway viaduct arches and 2,254sqm (Class B1) within the refurbished Pool House and Wash House (Grade II Listed), with associated works including disabled car parking spaces, cycle parking, landscaping and access improvements.	Construction started in mid-2017.
Ref: 14/AP/3844. Aylesbury Estate. Land Bounded by Albany Road, Portland Street, Bagshot Street, Alvey Street, East Street & Dawes Street, London, SE17.	900 m south-east.  Labelled as '9' in <b>Figure 2</b> .	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.	Outline planning permission granted 05/08/2015 (In construction and applications being submitted pursuant to Reserved Matters).
Ref: 17/AP/3910 and 19/AP/7564. 136-142 New Kent Road, Southwark.	30 m east).  Labelled as '10' in <b>Figure 2</b> .	Demolition of the existing building and construction of a part 13 storey / part 9 storey block fronting onto New Kent Road and a part 6 storey / part 4-storey block fronting onto Munton Road, to provide a mixed-use development, with basement, providing 81 residential units, 1361sqm of flexible business floor space / non-residential institution (Use Class B1 / D1) and 448sqm of retail floor space (Use Class A1) with associated cycle parking, servicing, refuse and recycling, landscaping and private and communal residential amenity space. Minor material amendment (19/AP/7564) including (but not limited to):	Approved 24 <sup>th</sup> October 2017, minor material amendment under consideration.

Planning Application Reference and Address	Location Relative to the Masterplan Site	Description	Status
		<ul style="list-style-type: none"> <li>Increase in overall height from 46.8m AOD to 49.0m AOD (i.e. +2.2m); and</li> <li>Changes to the residential unit mix.</li> </ul>	
Ref: 13/AP/1122. Chatelain House, 182- 202 Walworth Road, London, SE17 1JJ.	150 m south..  Labelled as '11' in <b>Figure 2.</b>	Demolition of the existing building and erection of a building ranging in height from 4 storeys to 6 storeys (plus basement) comprising 4,945 sqm (GEA) of use Class A1 (shops), A3 (restaurants and cafes), D2 (Assembly and Leisure) and B1 (Business) floorspace and 54 residential units with associated landscaping, play space, cycle parking and 6 accessible car parking spaces.	Approved 23 <sup>rd</sup> December 2015, reserved matter applications under consideration.
Ref: 18/AP/0737. Kennington And Walworth Delivery Centre, 111-123 Crampton Street, London, SE17 3AA.	200 m south..  Labelled as '12' in <b>Figure 2.</b>	Demolition and redevelopment for a mixed use development in a part four-/five-/six- /seven-storey building consisting of 48 residential units (2 studios, 17 x 1-bedroom, 24 x 2-bedroom and 5 x 3-bedroom flats), 221sqm of commercial floorspace (Use Class B1 - office), creation of new public realm, provision of 3 wheelchair accessible car parking spaces and associated landscaping (amendments received).	Approved 1st March 2019.
Ref: 19/02696/FUL. Woodlands Nursing Home, 1 Dugard Way, London, SE11 4 <sup>TH</sup> .	510 m west..  Labelled as '13' in <b>Figure 2.</b>	Redevelopment of the former Woodlands and Masters House site retaining the Masters House and associated ancillary buildings; demolition of the former care home; the erection of 29 storeys building and peripheral lower development of 3/4 storeys, to provide 258 residential units, together with servicing, disabled parking, cycle parking, landscaping, new public realm, a new vehicular and pedestrian access, and associated works.	Appeal ongoing.
Ref: 19/AP/2011. 35-39 Parkhouse Street, London, SE5 7TQ.	1.38 km south..  Labelled as '14' in <b>Figure 2.</b>	Demolition of existing buildings and construction of a mixed-use building ranging from six to 10 storeys in height (35.15m AOD) comprising 100 residential units (Use Class C3) and 1,323 sqm (GIA) of Class B1/B2/B8 floorspace) with associated car parking.	Under consideration.

## 5. Overview of the Development

### The H1 Development

5.1 It is important to note that at the time of preparing this EIA Scoping Report, the design of the H1 Development is not yet fixed for the purposes of the Applicant's forthcoming Planning Application. However, the information provided to Avison Young by the Applicant in respect of the H1 Development (and summarised here) is considered adequate to establish the potential for likely significant environmental effects to arise as a result of the demolition and construction works required to facilitate the H1 Development (the "Works") and the operation of the completed H1 Development. Consequently, the information provided as follows is considered appropriate to robustly advise upon EIA scoping matters.

5.2 The completed and operational H1 Development will provide:

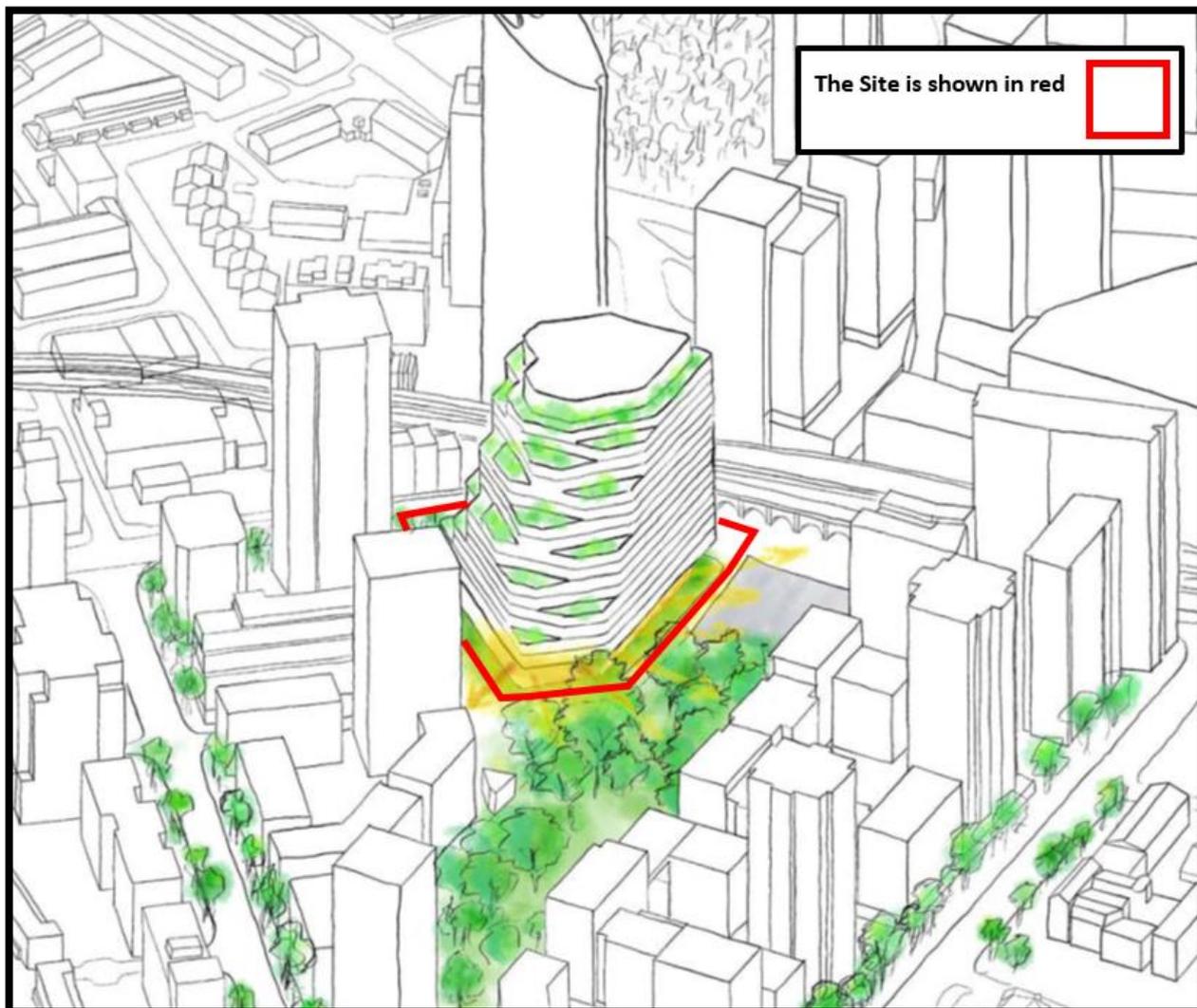
- One building of 18 floors (including ground) plus 2 floors of plant and one basement level.
- A total of approximately 64,000 sqm Gross External Area (GEA) of new floorspace, indicatively comprising 60,350 sqm of offices, 2,500 sqm of flexible offices /retail / services / food and drink and 1,150 sqm of flexible offices / medical and health floorspace. All proposed uses fall within Class E of the Use Classes Order 2020<sup>5</sup>.
- Public realm works, including hard and soft landscaping, and highway works to the neighbouring streets, principally to create Sayer Street North, with alterations to Deacon Street and incidental works to Elephant Road and Walworth Road.
- Servicing carried out from an internal loading dock, accessed from Deacon Street, with vehicles both entering and exiting from Walworth Road.
- A car free development other than allocated blue badge spaces to be located on Deacon Street.
- Cycle parking within the basement, accessed from Walworth Road.

5.3 **Figure 3** shows the indicative massing of the H1 Development.

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5 The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

**Figure 3: Indicative Massing of the H1 Development**



## The Approved Development

5.4 **Table 3** outlines the approved land uses and heights of the Approved Development plots, except for Plot H1 in its outline consented form, across the Masterplan Site and the current status of each plot

**Table 3 Land Uses and Heights of the Approved Development except for Plot H1 in its Outline Consented Form**

Plot	Land Uses	Approved Maximum Height in Storeys	Status
H2.	C3 Residential. A1-A5 Retail & Café / Restaurant.	Between 10 and 31 storeys.	Complete and occupied.
H3.	C3 Residential. A1-A5 Retail & Café / Restaurant.D1 Community.	Between five and 19 storeys.	Complete and occupied.

Plot	Land Uses	Approved Maximum Height in Storeys	Status
H4.	C3 Residential. A1-A5 Retail & Café / Restaurany.D2 Leisure.	Between eight and 25 storeys.	Under construction.
H5.	C3 Residential. A1-A5 Retail & Café / Restaurant. D2 Leisure.	Between eight and 25 storeys.	Under construction.
H6.	C3 Residential. A1-A5 Retail & Café / Restaurant.	Between three and 16 storeys.	Complete and occupied.
H7.	C3 Residential. A1-A5 Retail & Café / Restaurant. D2 Leisure.	Between nine and 25 storeys.	RMA consent achieved.
H10.	C3 Residential.	Between three and 10 storeys.	Complete and occupied.
H11a.	C3 Residential. A1-A5 Retail & Café / Restaurant. B1 Business.	Between 10 and 19 storeys.	Under construction.
H11b.	C3 Residential. A1-A5 Retail & Café / Restaurant.	Between 11 and 25 storeys.	RMA consent achieved.
H12.	D1 Community. Sui Generis Energy Centre & Ancillary Visitors / Café.	Four storeys.	Complete and occupied.
H13.	C3 Residential.	Between three and seven storeys.	Complete and occupied.
PAV1.	A1-A5 Retail & Café / Restaurant. D1 Community.	Single storey.	Under construction.

5.5 In addition, the Approved Development includes areas of open space, including a new park, gateway spaces, pocket parks and new streets.

5.6 **Figure 5** shows the layout of the Approved Development except for Plot H1 in its outline consented form. **Figure 6** shows an illustration of the indicative massing of the Plot H1 Development in the context of the Approved Development massing.

Figure 5: Layout of the Approved Development

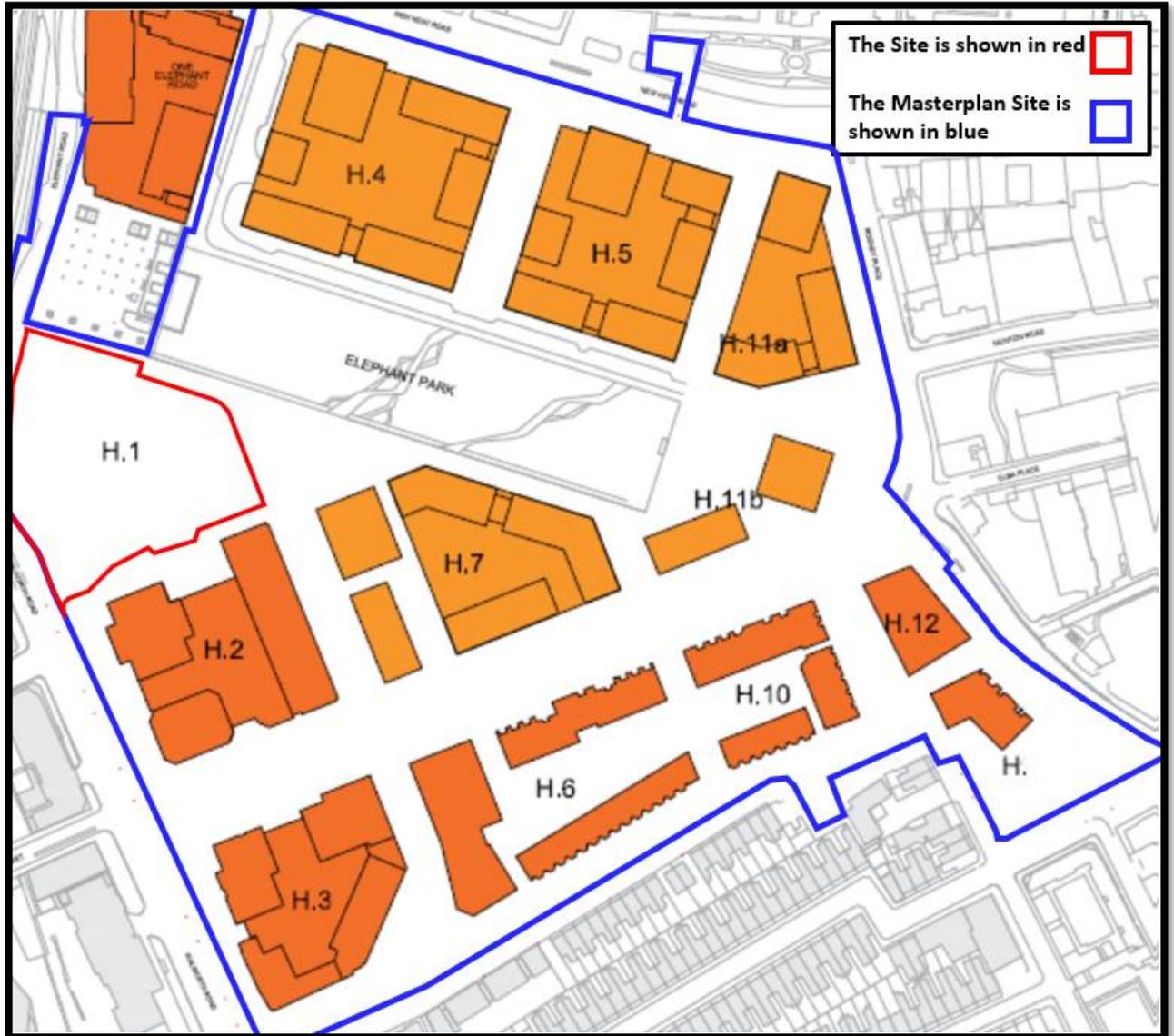
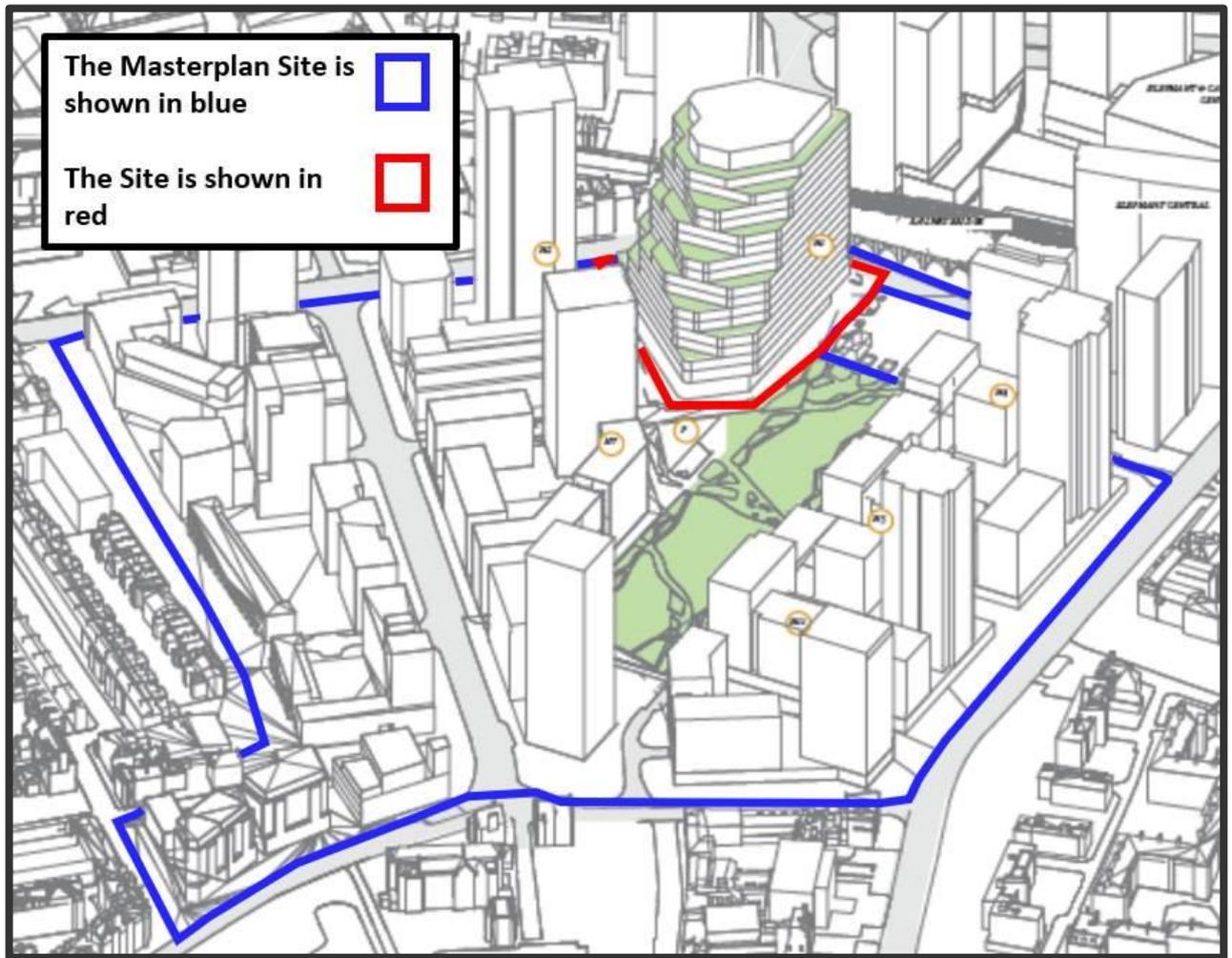


Figure 6: Indicative Massing of the H1 Development in the Context of the Approved Development Massing



## 6. The Broad EIA Methodology

### The EIA Regulations and Best-Practice Guidance

- 6.1 The EIA will be undertaken in accordance with the EIA Regulations and current EIA best-practice guidelines, as will the preparation of the of ES.
- 6.2 All environmental topics scoped into the ES will be assessed in line with relevant topic specific methodologies and best-practice guidelines (refer to **Section 7**).

### Consultation

- 6.3 Consultation with statutory and non-statutory consultees has been (and will continue to be) undertaken as part of the EIA process. Such consultation seeks to:
- Obtain views upon the likely significant environmental effects of the H1 Development.
  - Agree appropriate EIA related scopes of work and assessment methodologies.
  - Agree appropriate environmental mitigation and / or enhancement, where relevant.
  - Obtain any other relevant information held by statutory and non-statutory consultees that will facilitate undertaking the EIA and preparing the ES.
- 6.4 Key decision makers, statutory and non-statutory consultees relevant to the EIA process include:
- LBS.
  - The Greater London Authority (GLA).
  - Transport for London (TfL).
  - The Environment Agency (EA).
  - Historic England.
  - The London Wildlife Trust.
  - Natural England.
  - Local residents and neighbours.

## Establishment of the Relevant Environmental Baseline Conditions

- 6.5 In order to measure or judge the likely significant environmental effects of a project, the change brought about to the environment as a result of the project must be established. It is therefore necessary to establish the relevant environmental conditions that will exist at and around a site in the absence of the project (the baseline conditions). This information then serves to provide a datum against which environmental change is measured or judged.
- 6.6 As outlined in **Section 4** all other elements of the Approved Development will be complete and operational before Plot H1 is completed. In addition, the majority of the Approved Development is already built and occupied or under construction. This necessitates the following facts and reasonable assumptions to be applied to the EIA:
- The existing baseline conditions within the Masterplan Site are in a current state of flux and represent only temporary and interim conditions.
  - The pre-Elephant Park baseline conditions do not exist and cannot ever exist again.
  - The H1 Development is being designed on the basis of the presence and operation of the Approved Development except for Plot H1 in its outline consented form.
  - As a result of the above, the likely significant environmental effects resulting from the completed and operational H1 Development must be assessed against a set of 'likely future baseline' conditions which assume the full implementation of all other elements of the Approved Development. However, it is important to note that:
    - The likely significant effects associated with the Works necessary to implement the H1 Development will take into account any overlap in construction with other elements of the Approved Development, in accordance with the Updated Detailed Phasing Plan for the Elephant Park Development accompanied by the August 2020 ES.
    - The likely significant effects of the H1 Development will be assessed in the context of the Approved Development (except for Plot H1 in its outline consented form). This will allow for the identification of any new or additional significant environmental effects arising from the H1 Development upon receptors within the Approved Development, and / or as a combination of the H1 Development and the Approved Development in existence together. In this way, and as stated in **Section 2**, the EIA process and the resultant ES for the H1 Development will report upon the likely significant environmental conditions as a result of the Approved Development (except for Plot H1 in its outline consented form) and the H1 Development. However, the approach will avoid the duplication of identifying significant environmental effects which have already occurred as a result of the significantly complete and operational Approved Development and which now form part of the prevailing existing baseline and therefore, the likely future baseline conditions.

- 6.7 The above is a tried and tested EIA approach / strategy that has been successfully implemented elsewhere on other similar complex London-based urban regeneration EIA projects.
- 6.8 In view of the above, data and information was (and will continue to be) collated via various means in order to robustly identify and, where relevant, evaluate the relevant likely future baseline conditions. This will include specific environmental resources / 'receptors' or groups of resources / receptors that may be significantly affected by the H1 Development.
- 6.9 The collation of relevant baseline information may involve one or more of the following:
- Consultation with statutory and non-statutory consultees.
  - Establishment of an appropriate study area specific to the environmental topic area being studied.
  - Desk-based study, including review of the August 2020 ES where relevant.
  - Site surveys and investigations.
  - Technical modelling.

## An Iterative EIA and Design Process

- 6.10 The iterative EIA and design process begins with establishing the relevant environmental baseline conditions of a site and its surrounds (refer to above). This allows key environmental constraints and opportunities to be considered by a design team so that an emerging project design can respond appropriately to avoid or minimise likely significant adverse effects and encourage and maximise likely significant beneficial effects.
- 6.11 The iterative EIA design process will also be informed by on-going environmental technical assessments.

## The Study of Alternatives

- 6.12 In accordance with the EIA Regulations, the reasonable alternatives considered by an applicant must be studied and reported within an ES. As such, the ES will set out a description of such reasonable alternatives and an indication of the main reasons for the selection of the H1 Development, alongside a comparison of the likely environmental effects of the reasonable alternatives considered. The ES will therefore include a high-level and summary description of the following:
- **The 'do-nothing' scenario:** That is, the consequences of no development taking place on the Site and *"...an outline of the likely evolution thereof [the Site] without implementation of the development as far as natural changes from the baseline scenario can be assessed..."* Although not strictly a 'reasonable alternative' considered by the Applicant (the Site comprises land including the final plot within the wider Approved Development), the EIA Regulations state that the ES must set this information out.

- **The 'OPP' scenario:** that is Plot H1 as defined in the Approved Development (i.e. in its outline consented form).
- **Alternative designs:** A summary of the main alternatives considered, such as alternative mixes of land-uses, alternative building layouts, alternative building scales and other design matters resulting from the iterative EIA and design process.

6.13 Alternative sites have not been considered by the Applicant and so will not be considered in the ES.

## A Description of the Development

6.14 A robust EIA process requires the subject planning application (the H1 Development) to be fully understood and assessed for its likely significant environmental effects. Accordingly, and in line with the EIA Regulations, a comprehensive and factual description of the H1 Development as defined by the detailed planning application drawings, accommodation schedule and other information submitted for approval will be provided in the ES.

6.15 A factual description of the Approved Development, except for Plot H1 in its outline consented form which will form part of the likely future baseline, will also be provided in the ES.

## A Description of the Development Programme and Associated Works

6.16 The likely significant effects of a project include any significant effects likely to result from the works necessary to implement the project. For example, likely significant effects resulting from any demolition, construction and so on. The ES will therefore include the following information:

- A programme / timetable of the Works required to facilitate the H1 Development, together with details regarding any phasing of the Works.
- For completeness, a programme / timetable of the works for the Approved Development, allowing any overlap of works between Plots to be identified.
- Structures to be removed.
- Broad methods of demolition and construction.
- An outline Construction Environmental Management Plan (CEMP).

6.17 The outline CEMP will set out relevant construction environmental management measures, techniques and protocols. These will aim to regulate activities associated with the Works and minimise significant adverse effects upon the environment, including the local community in proximity to the Site. Such measures will be consistent with, and cognisant of, the requirements of the planning conditions attached to the OPP and accompanying Section 106 Agreement (S.106) obligations and will be assumed to be 'tertiary mitigation' (refer to below).

## Identification of Likely Significant Environmental Effects

- 6.18 The likely significant environmental effects of the H1 Development upon specific receptors or groups of receptors will be established for the Works and for the completed and operational H1 Development. This will be undertaken using information relating to:
- The relevant environmental baseline conditions.
  - The description of the H1 Development programme and associated Works, including the outline CEMP.
  - The description of the H1 Development.
- 6.19 As previously noted, this will allow for the identification for any new or additional significant environmental effects arising from the H1 Development upon receptors within the Approved Development, and / or as a combination of the H1 Development and the Approved Development in existence together. In this way, and as stated in **Section 2** the EIA process and the resultant ES for the Plot H1 Development will report upon the likely significant environmental conditions as a result of the Approved Development (except for Plot H1 in its outline consented form) and the H1 Development. The approach will avoid the duplication of identifying significant environmental effects which have already occurred as a result of the significantly complete and operational Approved Development and which now form part of the prevailing existing and therefore, the likely future baseline conditions
- 6.20 Assessments may be informed by professional and expert judgement, calculations and / or detailed, scientific modelling.
- 6.21 When identifying the likely significant environmental effects of the Works, in accordance with best-practice guidance, the outline CEMP will be considered as 'tertiary' mitigation. That is, mitigation which:
- "...will be required regardless of any EIA assessment, as is imposed, for example, as a result of legislative requirements and / or standard sectorial practices. For example, considerate contractor practices that manage activities which have potential nuisance effects."*<sup>6</sup>
- 6.22 When identifying the likely significant effects of the completed and operational H1 Development, only mitigation that is inherent to the design of the H1 Development will be considered.

## Defining the Significance of Effects

- 6.23 For each of the environmental topic areas assessed as part of the EIA process, and reported within the ES, an assessment will be made in relation to the relative significance of the likely environmental effects identified. This will be carried out with reference to definitive standards and legislation, where available. Where it is not possible

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<sup>6</sup> Institute of Environmental Management and Assessment (IEMA). Environmental Impact Assessment Guide to: Delivering Quality Development. 2016.

to quantify effects, qualitative assessments will be carried out, based on available knowledge and professional judgement.

6.24 The significance of predicted effects will be determined with reference to assessment criteria for each environmental topic considered. These criteria apply a common EIA approach of classifying effects according to whether they are major, moderate or minor effects that are adverse or beneficial, or they are insignificant.

6.25 Specific criteria for each issue will be developed, giving due regard to the following, as relevant:

- Extent and magnitude of the effect.
- Duration of the effect (short, medium or long-term).
- Permanence of the effect (temporary or permanent).
- Nature of the effect (direct or indirect, reversible or irreversible).
- Whether the effect occurs in isolation, is cumulative or interactive.
- Performance against environmental quality standards or other relevant pollution control thresholds.
- Sensitivity of the environmental resource / receptor.

6.26 In order to provide a consistent approach in reporting the outcomes of the various studies undertaken as part of the EIA, the following terminology will be used throughout the ES to describe the likely significance (or otherwise) of identified effects:

- **Insignificant:** No significant effect to an environmental resource or receptor.
- **Significant beneficial:** Advantageous or positive effect to an environmental resource or receptor.
- **Significant adverse:** Detrimental or negative effect to an environmental resource or receptor.

6.27 Whilst there is no recognised definition of what constitutes a 'significant' effect, it is good practice to identify the degree of significance or importance. It is therefore proposed that, where adverse or beneficial effects have been identified, they will be addressed as being of either:

- **Minor significance:** Slight, very short or highly localised effect.
- **Moderate significance:** Limited effect (by extent, duration or magnitude) which may be considered significant.
- **Major significance:** Considerable effect (by extent, duration of magnitude) of more than local significance or in breach of recognised acceptability, legislation, policy of standards.

6.28 For the avoidance of doubt, it should be noted that effects of minor, moderate and major significance will all be considered as 'significant effects'.

- 6.29 The specific criteria for identifying the degree of significance for each of the environmental topic areas assessed as part of the EIA process will be identified within the stated methodology for each of the environmental topic areas reported within the ES.

## Additional Mitigation Measures and / or Enhancement

- 6.30 Where significant adverse environmental effects are identified and attributable to the H1 Development, additional mitigation measures will be recommended and set out in the ES.
- 6.31 Where opportunities for further environmental enhancement exist to maximise significant beneficial effects, this will also be recommended and set out in the ES.
- 6.32 It is important to note that such mitigation and enhancement is different to, and additional to the inherent mitigation designed into the H1 Development for which detailed planning permission is sought and the tertiary mitigation previously described.
- 6.33 It is anticipated that such additional mitigation measures and / or enhancement will be transposed into appropriate planning conditions or other planning related legal agreements. In this way, implementation of the additional mitigation and / or enhancement can be ensured which then provides confidence in the resulting assessment of the likely significant residual effects of the H1 Development (refer to below).

## Identification of Likely Significant Residual Effects

- 6.34 The likely significant residual environmental effects of the H1 Development upon specific environmental resources / receptors or groups of resources / receptors will be established, again, for the Works and for the completed and operational H1 Development. This will be undertaken using information relating to:
- The likely significant effects of the H1 Development.
  - The implementation of additional mitigation measures and / or enhancement.
- 6.35 As for the identification of likely significant effects, assessments may be informed by professional and expert judgement, calculations and / or detailed, scientific modelling. Similarly, the significance of residual effects will be determined in line with the assessment criteria established for each environmental topic area assessed as part of the EIA process, and reported within the ES using the terminology provided earlier.

## Cumulative Effects

- 6.36 In line with Schedule 4 Paragraph 5(e) of the EIA Regulations, an ES must provide a description of the likely significant effects of a project on the environment resulting from:

*"...the cumulation of effects with other existing and / or approved projects..."*

- 6.37 Such effects are known as 'cumulative effects'.
- 6.38 In general terms, owing to the fragmented urban nature of the Site's environmental context, significant schemes need only be considered up to approximately 1.5 km from the Site boundary. With reference to **Section 4, Figure 2** and **Table 2**, a review of the August 2020 ES and a search of online databases and planning portals identified 14 schemes to be considered within the cumulative assessment.
- 6.39 It is recognised that the assessment of long-distance views may necessitate the consideration of schemes located in excess of 1.5 km from the Site boundary. Furthermore, new schemes may arise with time. Accordingly, the approach to the assessment of cumulative effects will be monitored and reviewed during the pre-application programme and, if necessary, tailored to the particular environmental topic being considered. Full justification will be provided within the ES.

## Effect Interactions

- 6.40 Although not required by the EIA Regulations, it is common practice for an ES to acknowledge effect interactions; that is, the combination of different environmental effects resulting from one project upon individual sensitive environmental resources / receptors, or a set of sensitive resources / receptors.
- 6.41 Again, likely effect interactions will be considered for the Works and for the completed and operational H1 Development. The assessment will be informed by the results of the EIA process in respect of the identified likely significant effects of the H1 Development (in isolation) for each topic area scoped into the ES.

## 7. Likely Significant Effects to be Addressed in the ES

### Socio-economics

#### Summary Baseline Information and Key Issues

- 7.1 As outlined in **Section 4**, the Site is void of permanent structures but currently comprises a modular building for Masterplan Site welfare. This is associated with the on-going implementation of the Approved Development.
- 7.2 In the likely future baseline situation, the majority of temporary employment currently supported by the Masterplan Site will no longer be supported. In addition, there will be an increase in both residential population and employment across the Masterplan Site as a result of the land uses associated with the Approved Development (refer to **Table 3**).
- 7.3 In 2019 LBS accommodated 254,000 workers, 50% of which were office based. Despite significant growth in office floorspace, LBS has challenging future floorspace targets, highlighting a substantial need for new office floorspace in the borough. Elephant and Castle is identified as an opportunity area which could provide 10,000 new jobs, but currently has an underdeveloped office offering relative to the adjacent areas of South Bank and Borough.
- 7.4 The H1 Development will contribute a significant quantity of commercial floorspace which could transform the office market in this location. It has the potential to generate employment opportunities both during the Works, but more importantly once fully completed and operational. The workers associated with the additional employment opportunities are expected to spend money in the local area. However, as explained in **Section 8**, this is not expected to be significant in the context of already existing levels of spending.

#### Likely Significant Effects to be Addressed in the ES

- 7.5 The likely significant socio-economic effects to be considered in the ES are as follows:
- Creation of new permanent employment opportunities (direct, indirect and induced) resulting from the completed and operational H1 Development.
  - The provision of office floorspace, including affordable workspace.
  - The provision of other land uses that may arise out of seeking planning permission for flexible land uses, which may include healthcare provision.
  - The creation of new and enhanced public realm and amenity space.
- 7.6 All such effects will be considered for the H1 Development in the context of the Approved Development (except for Plot H1 in its consented outline form), and together with relevant Cumulative Schemes.

7.7 It is intended that the following socio-economic elements be scoped out of the ES (refer to **Section 8** for further details):

- Employment associated with the Works.
- Construction worker spending.
- Residential and associated population effects.
- Completed and operational employment spend.

Effects of an increased Site workforce upon local healthcare provision.

## Summary Assessment Methodology

7.8 An appropriate socio-economic assessment will be undertaken by Volterra. A summary assessment methodology is set out as follows.

### Establishment of the Existing Baseline Conditions

7.9 The existing socio-economic baseline conditions will be established with reference to a policy review and a desk-top review. The policy review will outline the relevant local and regional, social and economic policies. This review will include (but may not be limited to) the following planning policy documents:

- The National Planning Policy Framework (2019)<sup>7</sup>.
- London Plan (2016)<sup>8</sup>.
- Intend to Publish London Plan (2019)<sup>9</sup>.
- The Southwark Core Strategy (2011)<sup>10</sup>.
- The New Southwark Plan (2019)<sup>11</sup>.
- The Elephant and Castle Supplementary Planning Document (SPD) (2012)<sup>12</sup>.

7.10 The desk-top review of the existing socio-economic conditions will be undertaken to establish the existing baseline conditions across the relevant study areas. This review will consider information from database records such as the Office for National Statistics (ONS), Greater London Authority (GLA), NOMIS, London Office Policy Review

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7 Revised National Planning Policy Framework, February 2019.

8 The London Plan, The Spatial Development Strategy for London consolidated with alterations since 2011, 2016.

9 The London Plan, Intend to Publish version, Spatial Development Strategy for Greater London, 2019.

10 Southwark Council, Core strategy, 2011.

11 New Southwark Plan, 2019.

12 Southwark Council, Mayor of London, Elephant and Castle Supplementary Planning Document (SPD) and Opportunity Area Planning Framework (OAPF), 2012.

(LOPR), Valuation Office Agency (VOA), the London Development Database (LDD), and relevant information from the Applicant. Such information will be processed utilising geographic information systems (GIS) methodology.

7.11 The existing baseline analysis will summarise the socio-economic context of the Site and the Masterplan Site under the broad heading of economy and labour market. This will include data regarding:

- Employment.
- Sectoral employment.
- Unemployment and claimant count.
- Labour skill levels.
- Economic activity.
- The provision of commercial space.

7.12 The most recent published sources will be used (anticipated to date to 2019). However, where this is not possible, the next best alternative (i.e. the most up to date data) will be used as a proxy. This will be clearly described in the ES.

### **Establishment of the Likely Future Baseline Conditions**

7.13 The likely future socio-economic baseline conditions will be estimated via the use of publicly available and widely accepted economic forecasts, borough and / or regional plans or policies, as relevant.

7.14 Specifically, in order to consider likely future baseline employment levels, the assessment will present LBS and / or GLA projections of employment for the future baseline assessment year. These forecasts implicitly account for changes as a result of other future developments being brought forward in the relevant areas (this will further be sense-checked in the assessment, particularly in respect of the Approved Development). The pipeline of commercial development, available from the LDD, will be utilised in order to project the likely future baseline in the context of commercial floorspace.

7.15 Where no projections, plans or policies are available in order to estimate the likely future baseline situation with regard to socio-economic factors, or the likely future baseline is not expected to change significantly from the existing baseline conditions, likely significant socio-economics effects will be assessed against the existing baseline situation. Where this is the case this will be clearly explained.

### **Assessment of Likely and Residual Significant Effects**

7.16 The assessment of likely and residual socio-economic effects will be undertaken quantitatively wherever possible, utilising appropriate guidance.

- 7.17 The Employment Densities Guide 3rd edition (2015)<sup>13</sup> published by the Homes and Communities Agency (HCA) was written to assist in estimating the employment generated by property development across different floorspace types based on 'employment density' ratios, which are generally expressed as the number of square metres per full-time employee. This will be used to provide an estimate of the direct Full Time Equivalent (FTE) jobs supported once the H1 Development is operational.
- 7.18 The Additionality Guide, Fourth Edition (2014)<sup>14</sup> was produced by the HCA and provides guidelines to assess the effects of a proposed development after accounting for displacement, multiplier and leakage impacts. Additionality is defined as *"...the extent to which activity takes place at all, on a larger scale, earlier or within a specific designated area or target group as a result of the intervention"*. This will be used to provide an estimate of the indirect and induced, net additional employment effects of the H1 Development once operational.
- 7.19 The magnitude of the impact will be assessed against the relevant baseline conditions. Impacts will be quantified and contextualised to inform the judgment of magnitude wherever possible (for example quantifying job numbers and placing them in the context of existing employment). Where qualitative judgments are required, they will be fully detailed and justified.
- 7.20 The magnitude of impact will be combined with the sensitivity of receptor (judged based upon professional judgement) to determine the significance of effects. However, there are no pre-defined quantitative thresholds which determine the significance of socio-economic effects. Accordingly, the significance of likely and residual effects will be determined based upon fully justified professional judgment.

## Townscape, Visual and Above Ground Heritage

### Summary Baseline Information and Key Issues

- 7.21 Buildings and structures surrounding the Site are generally low to medium rise with a cluster of towers located west of the Site. The likely future baseline will result in buildings across the Masterplan Site ranging from three to 31 storeys and therefore will not be dissimilar to existing massing in the area surrounding the Masterplan Site.
- 7.22 Elephant and Castle lies in the background of the London View Management Framework (LVMF)<sup>15</sup> Townscape View from the Serpentine Bridge in Hyde Park to the Palace of Westminster (Assessment Point 23A.1). This is an important consideration for the design of H1 Development.
- 7.23 The Site is not located within a conservation area and although several exist in the wider surrounding area of the Site, none are within proximity. All or part of the following conservation areas are within 250m of the Site:
- Larcom Street.

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<sup>13</sup> Homes and Communities Agency (2015), Employment Density Guide 3rd Edition 2015, HCA.

<sup>14</sup> Homes and Communities Agency (2014), Additionality Guide Fourth Edition 2014, HCA.

<sup>15</sup> London View Management Framework, Supplementary Planning Guidance, Mayor of London, March 2012.

- Pullens Estate.
- Walworth Road.

7.24 No listed buildings are present on-Site but there are a number of Grade II listed buildings within 250m of the Site, these include:

- Southwark Municipal Offices, Walworth Road.
- The Walworth Clinic, Walworth Road.
- Southwark Central Library and Cumings Museum, Walworth Road.
- Church of St John the Evangelist, Larcom Street.
- Numbers 140, 142, 150 and 152 Walworth Road.
- The Michael Faraday Memorial.
- Metropolitan Tabernacle.
- Metro Central Heights.
- Railings, gates and piers to Old St Mary's Churchyard.
- The Star and Cross Church, Falmouth Road.

7.25 The H1 Development will bring about a change to the built form, massing and land uses of the Site. Such changes have the potential to alter (improve) the existing townscape character and quality of the Site and its surrounds, together with views to and from the Site. In addition, the H1 Development has the potential to generate new local views. Furthermore, the H1 Development has the potential to affect the settings of statutory and non-statutory above ground heritage assets surrounding the Site.

### **Likely Significant Effects to be Addressed in the ES**

7.26 The assessment will separately consider the likely significant effects of the H1 Development on townscape character, visual amenity and the appreciation of the heritage significance of identified heritage assets in the vicinity of the Site.

7.27 Likely significant townscape, visual and above ground heritage effects to be addressed within the ES are set out as follows:

- Temporary visual intrusion during the Works.

- Changes to the townscape character, context and quality of the Site and its surrounds and resultant effects on identified townscape character areas, due to the presence of the completed and operational H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form), and in combination with relevant cumulative schemes.
- Changes to the settings of local designated heritage assets and resultant effects on the appreciation of the heritage significance of those heritage assets in the context of the Approved Development (except for Plot H1 in its outline consented form), and in combination with other relevant cumulative schemes.
- Effects on the LVMF designated view from Hyde Park to the Palace of Westminster (Assessment Point 23A.1) in the context of the Approved Development (except for Plot H1 in its outline consented form), and in combination with other relevant cumulative schemes.
- Effects upon a selection of non-statutory short, medium and long-range views (including the visual amenity experienced by people within the views) due to the presence of the completed and operational H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form), and in combination with other relevant cumulative schemes.

## Summary Assessment Methodology

- 7.28 A full townscape and visual and built heritage assessment will be undertaken by the Tavernor Consultancy. In-line with the aforementioned EIA strategy, the relevant baseline conditions will include the built form of the Approved Development (except for Plot H1 in its outline consented form). This assessment will take into account the existing and future baseline physical fabric of the area, the character and settings of designated heritage assets in the vicinity, the appropriateness of the Site for the H1 Development and the character of the proposed design. These issues are inter-related but can be broadly separated into townscape and visual and built heritage effects.
- 7.29 The townscape and visual assessments will be based upon the principles set out in Guidelines for Landscape and Visual Impact Assessment (GLVIA)<sup>16</sup>. Reference will also be made to relevant guidance and planning policies, as necessary.
- 7.30 The above ground heritage element of the assessment will be based upon guidance contained in the following documents:
- The Planning (Listed Buildings and Conservation Areas) Act 1990.
  - Section 16 of the National Planning Policy Framework (NPPF)<sup>17</sup>.
  - Relevant National Planning Practice Guidance (PPG).

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<sup>16</sup> Third Edition of Guidelines for Landscape and Visual Impact Assessment (GLVIA3), Landscape Institute and IEMA, 2013,

<sup>17</sup> National Planning Policy Framework, Ministry of Housing, Communities and Local Government, 2019.

- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017)<sup>18</sup>.
- Conservation Area Appraisal, Designation and Management (2019)<sup>19</sup>.

7.31 A combination of desk-based study and field survey will be undertaken to establish the relevant existing, and likely future, townscape, visual and above ground heritage baseline conditions of the Site and its surrounding context. This will include for the determination and evaluation of:

- The Zone of Theoretical Visibility (ZTV) of the Site with the H1 Development in place in the context of the Approved Development (except for Plot H1 in its outline consented form). The ZTV will be described and has already informed the study areas for the townscape, visual and above ground built heritage assessments.
- The townscape character of the Site and within a study area of 250m from the Site boundary, including its character, value, susceptibility to change and resulting sensitivity;
- The identification of appropriate short-, medium- and long-range representative views for assessment, including establishing their character and composition, value, the susceptibility of their likely visual receptors to change and the resulting sensitivity. The locations of proposed assessment viewpoints to be agreed with LBS officers are provided within **Appendix II**.
- Designated above ground heritage assets within 250m of the Site, or more distant where testing shows that due to the alignment of the townscape context they may be affected by the H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form) . Locally listed buildings adjacent to the Site will also be considered. The value of each heritage asset, the contribution of the setting to the appreciation of its heritage significance and the resulting susceptibility of its setting; combining those judgements its sensitivity will be assessed.

7.32 Each of the agreed assessment views will be photographed using a precise methodology to produce fully verified and accurate images in accordance with the Landscape Institute Technical Guidance Note 06/19, Visual Representation of Development Proposals.

7.33 A 3D model of the H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form) and then with relevant cumulative schemes will be modelled in wireline or fully rendered form within the verified baseline photography to produce Accurate Visual Representations (AVRs) of both scenarios within the assessment viewpoints. In consultation with LBS a set of views and a split of wireline and fully rendered views for assessment has been agreed. The AVRs will be appraised to determine:

- The likely scale and nature of effects of the completed and operational H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form) upon the character, composition and visual amenity of agreed views.

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<sup>18</sup> Historic Environment Good Practice Advice in Planning Note 3 (2nd Edition): The Setting of Heritage Assets, Historic England 2017.

<sup>19</sup> Conservation Area Appraisal, Designation and Management, Historic England, 2019.

- The likely scale and nature of effects of the completed and operational H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form) together with relevant cumulative schemes upon the character, composition and visual amenity of agreed views.
- 7.34 The AVRs will also inform the assessment of the scale and nature of effects on townscape character and the effects on the setting of the identified heritage assets.
- 7.35 In the assessment of effects structured, informed and reasoned professional judgement will be used to take account of quantitative and qualitative factors. It is recognised that the character of London is one of contrasts, of historic and modern buildings, and that modern buildings of high design quality do not necessarily or by definition harm the settings of heritage assets or the character of historic townscape or views.
- 7.36 Effects will be categorised as causing no change (no effect), having an almost imperceptible (insignificant) effect or a minor, moderate or major scale of effect. For effects judged to be minor, moderate or major in scale the nature of that effect will be further assessed as beneficial, neutral or adverse. A neutral effect is one where, regardless of the scale of the effect, the nature of the change has no qualitative effect on the receiving environment. This could mean, for example, that there is a change to the character or composition of a view, but that the quality of the visual experience is neither better nor worse than the existing condition or that the balance of adverse and beneficial effects is finely balanced. Adverse effects are those that detract from the value of the resource affected. Beneficial effects are those that contribute to the value of the resource. Major and moderate effects are considered to be 'significant'.
- 7.37 It should be noted that the assessment of all likely significant townscape, visual and above ground heritage effects associated with the Works will be based upon qualitative judgement only.

## Air quality

### Summary Baseline Information and Key Issues

- 7.38 In accordance with the 'UK Air Quality Strategy'<sup>20</sup> and Part IV of the 'Environment Act'<sup>21</sup>, the LBS has, and will, continue to review the ambient air quality within its administrative boundary.
- 7.39 Work to date has concluded that the Borough-wide levels of nitrogen dioxide (NO<sub>2</sub>) and fine particulate matter are not meeting the Air Quality Strategy Objectives<sup>20</sup>. As such, in 2003 the LBS declared the entire Borough an Air Quality Management Area (AQMA) for NO<sub>2</sub> and particulate matter measuring less than ten micrometres or less in diameter, (PM<sub>10</sub>) attributed to road traffic emissions<sup>22</sup>. Accordingly, an Air Quality Strategy was produced setting out policies and measures to be implemented to improve air quality in the Borough.

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<sup>20</sup> DEFRA. The Air Quality Strategy for England, Scotland, Wales & Northern Ireland. 2007.

<sup>21</sup> Office of the Deputy Prime Minister (ODPM). The Environment Act. 1995.

<sup>22</sup> Southwark Council, Air Quality Annual Status Report, 2019

- 7.40 Based on the air quality assessments within the March 2012 ES, September 2012 ES Addendum and the August 2020 ES, the predominant source of air pollution in the local area is from existing vehicle emissions on the surrounding road network, including Walworth Road.
- 7.41 Considering the above, key air quality issues in respect of the H1 Development relate to ensuring ambient air quality is not significantly worsened by any aspect of the H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form) and ensuring that future users of the H1 Development are appropriately protected against poor air quality.

## Likely Significant Effects to be Addressed in the ES

- 7.42 The likely significant air quality effects to be considered within the ES are as follows:
- Emissions to the air (and associated effects to local air quality at receptors surrounding the Site including those in the Masterplan Site) via changes in NO<sub>2</sub> and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) from vehicle emissions generated by the H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form).
  - Effects on future users of the H1 Development arising from local air emissions sources, including likely future baseline conditions associated with emissions arising from the Approved Development (except for Plot H1 in its outline consented form) including the Approved Development's Energy Centre.
- 7.43 Relevant receptor locations within the H1 Development will be selected at locations that represent relevant exposure to the air quality objectives. The annual mean objectives do not apply at the H1 Development as the H1 Development will comprise offices, retail and public realm, which are not relevant exposure to the annual mean air quality objectives as defined in Box 1.1 of Defra's Air Quality Technical Guidance TG(16)<sup>23</sup>. The publicly accessible areas of the H1 Development (i.e. the retail and public realm) will represent relevant exposure to the 1-hour mean NO<sub>2</sub> objective and 24-hour mean PM<sub>10</sub> objective.
- 7.44 Construction related air quality effects are intended to be scoped out of the ES. Further detail is provided in **Section 8**.

## Summary Assessment Methodology

- 7.45 It is anticipated that the assessment will comprise the following:
- Identification of potentially sensitive existing and future receptor locations which could be affected by changes in air quality resulting from the operation of the completed H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form).

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<sup>23</sup> Defra. Local Air Quality Management Technical Guidance (TG16). February 2018. Available: <https://laqm.defra.gov.uk/technical-guidance/>.

- Establishment of the relevant existing air quality baseline conditions via a review of relevant LBS air quality review documents and data from the LBS monitoring network. As the LBS undertakes air quality monitoring across the Borough, additional monitoring is deemed unnecessary and will not be undertaken. This is consistent with the approach taken in the August 2020 ES.
- Application of the ADMS-5 air quality dispersion model, using data from the Applicant's Building Services Consultant, to assess the likely future baseline conditions from the emissions from the Approved Development Energy Centre. The H1 Development will link into this Energy Centre.
- Application of the ADMS-Roads air quality dispersion model, using data from the Applicant's Transport Consultant (BuroHappold), to determine the likely impacts and effects of the operation of the H1 Development on concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> from H1 Development-generated road traffic emissions in the proposed year of opening.
- The ADMS-Roads and ADMS-5 air quality models will also consider conditions at the proposed retail units introduced as part of the H1 Development.
- Comparison of the predicted pollutant concentration with the Air Quality Strategy Objectives and determination of the significance of impacts upon nearby residents based on the Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) significance criteria<sup>24</sup>.
- Formulation of appropriate mitigation measures, where necessary.

7.46 In-line with the EIA strategy, the air quality dispersion modelling will include emissions associated with the Approved Development (except for Plot H1 in its outline consented form) in the likely future baseline scenario.

7.47 In addition to the above, the London Plan<sup>25</sup> requires that new developments within London are 'air quality neutral'. To demonstrate this, the operational H1 Development will be assessed against the Emission Benchmarks as set out within the SPG<sup>26</sup>. The findings will be reported in an Air Quality Neutral Assessment. The Air Quality Neutral Assessment will be appended to the ES and referenced, as appropriate, in the air quality assessment. Any additional technical data relevant to the assessment provided will also be appended to the ES.

## Wind Microclimate

### Summary Baseline Information and Key Issues

7.48 Based on combined wind climate statistics from Heathrow, Stanstead and Gatwick, the prevailing winds at the Site blow from the south-westerly sector, with wind speeds being greater in the winter months when the most frequent

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<sup>24</sup> EPUK and IAQM. Land-Use Planning & Development Control: Planning for Air Quality. 2017.

<sup>25</sup> The London Plan, The Spatial Development Strategy for London (consolidated with alterations since 2011), Mayor of London, 2016

<sup>26</sup> Mayor of London (2014); The Control of Dust and Emissions during Construction and Demolition – Supplementary Planning Guide, July 2014

strong winds blow from the west-south-west. Wind speeds are generally lower during the summer. North-east winds are common during spring but are generally lighter than south-westerly winds.

- 7.49 Existing pedestrian level wind conditions in and immediately around the Site are expected to be dictated by the Site's exposure to prevailing south-westerly winds. The surrounding buildings are of low to medium rise in height, with a cluster of towers located west of the Site. Consequently, the existing surrounding and on-Site built form is unlikely to create any significant localised wind effects.
- 7.50 In the likely future baseline situation, the Masterplan Site will comprise buildings ranging in height from three to 31 storeys. These will be located to the north-east and south-east of the Site. Accordingly, the prevailing south-westerly winds are expected to remain consistent within the likely future baseline situation. However, the presence of the Approved Development (except for Plot H1 in its outline consented form) can be expected to affect north-easterly and south-easterly winds. This was demonstrated within the March 2012 ES, the September 2012 ES Addendum and the August 2020 ES.
- 7.51 The H1 Development will give rise to a new Site layout and massing which has the potential to alter prevailing wind conditions. In particular, the overall increased massing of built form within the Site may give rise to areas of locally accelerated winds.
- 7.52 The H1 Development will give rise to a new pedestrian usage of the Site, with pedestrian routes, public open space and private amenity space. Amenity uses, in particular, will require relatively calm wind conditions in order for the intended pedestrian activity to be comfortable, useable and safe during appropriate times of the year. The achievement of a suitable wind microclimate both in and surrounding the Site (including the Masterplan Site) is therefore paramount to good design.

## Likely Significant Effects to be Addressed in the ES

- 7.53 The likely significant wind microclimate effects to be considered in the ES relate to:
- Temporary and transient changes in the local wind environment both on and off-Site during the Works together with any associated effects to pedestrian comfort and safety giving due consideration to the type of pedestrian activity likely to occur at specific locations and specific seasons.
  - Long-term changes in the local wind environment both on and off-Site once the H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form) is completed and operational and any associated effects to pedestrian comfort and safety giving due consideration to the type of pedestrian activity likely to occur at specific locations and specific seasons.

## Summary Assessment Methodology

- 7.54 As the Works progress, the conditions on and around the Site would be expected to gradually transition between those of the likely future baseline (in the absence of the H1 Development) and the final completed H1 Development

in the context of the Approved Development (except for Plot H1 in its outline consented form). As per standard practice, a qualitative approach will be taken to the assessment of the Works.

- 7.55 Full wind tunnel testing will be undertaken for the following test configurations:
1. The existing Site + the Approved Development (except for Plot H1 in its outline consented form) + all significant existing features outside of the Masterplan Site.
  2. The H1 Development + the Approved Development (except for Plot H1 in its outline consented form) + all significant existing features outside of the Masterplan Site.
  3. The H1 Development + the Approved Development (except for Plot H1 in its outline consented form) + relevant cumulative schemes (refer to **Section 4**) + remaining significant existing features outside of the Masterplan Site.
- 7.56 For all test configurations a 1:300 physical scale model will be constructed extending to 360 m from the centre of the Site.
- 7.57 The above will determine the likely pedestrian level wind conditions in and around the Site at specific locations such as main pedestrian routes, building entrances and amenity spaces for all relevant scenarios.
- 7.58 The results of the wind tunnel testing will then be combined with long-term wind climate statistics, corrected to apply at the Site, and benchmarked against the commonly used Lawson Comfort Criteria (LDDC Variant). Such criteria identify the wind conditions and thresholds for a range of pedestrian activities such as sitting, strolling, business (fast) walking and so on. In this way, the results of the wind tunnel testing can be used to determine the comfort and safety of the wind microclimate in relation to the expected pedestrian activities at and surrounding the Site for all relevant test scenarios.
- 7.59 Should the preliminary results of the wind tunnel testing for test configuration 2 or, if necessary configuration 3 reveal unacceptably uncomfortable or unsafe wind conditions then the design of the H1 Development will be refined and further wind tunnel testing undertaken to quantify the effectiveness of such 'mitigation by design'.
- 7.60 The conclusions of the wind tunnel testing will be summarised in the ES, with all technical details appended to the ES.

## Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare

### Summary Baseline Information and Key Issues

- 7.61 As noted in **Section 4**, the Site is currently void of permanent structures but currently comprises a modular building for Masterplan Site welfare, a small area of temporary public realm on south side of the Site, used as a meadow, pathways and seating areas. Accordingly, the existing Site does not cause significant daylight, sunlight or overshadowing issued to surrounding sensitive receptors.

- 7.62 In the likely future baseline situation, the Masterplan Site will comprise buildings ranging from three to 31 storeys. This Masterplan Site massing will give rise to likely future daylight, sunlight and overshadowing conditions consistent with those anticipated for an area undergoing such substantial and large-scale redevelopment. Indeed, this has been proven as part of the aforementioned March 2012 ES, September 2012 ES Addendum and August 2020 ES.
- 7.63 The change in on-Site massing brought about by the H1 Development will have the potential to obstruct and reduce levels of daylight and sunlight to residential receptors and increase overshadowing of amenity spaces surrounding the Site. In addition, it has the potential to lead to solar glare and light pollution effects.

### Likely Significant Effects to be Addressed in the ES

- 7.64 The likely significant daylight, sunlight, overshadowing, solar glare and light pollution effects to be considered in the ES are:
- Temporary and transient changes to levels of daylight and sunlight to residential properties surrounding the Site (including those within the Masterplan Site) during the Works.
  - Temporary and transient changes to incidences of overshadowing to amenity areas surrounding the Site (including those within the Masterplan Site) during the Works.
  - Temporary and transient changes to solar glare at sensitive viewpoints (road users and train drivers) surrounding the Site (including those within the Masterplan Site) during the Works.
  - Temporary and transient changes to light pollution at residential properties surrounding the Site during the Works.
  - Long-term changes to the duration and quantum of daylight and sunlight to existing residential properties surrounding the Site (including those within the Masterplan Site) as a result of the completed H1 Development.
  - Long-term changes to the duration and quantum of sunlight amenity to public and private amenity spaces surrounding the Site (including those within the Masterplan Site) as a result of the completed H1 Development.
  - Long-term changes to solar glare at sensitive viewpoints (road users and train drivers) surrounding the Site (including those within the Masterplan Site) as a result of the completed H1 Development.
  - Long-term changes to light pollution experiences at residential properties surrounding the Site (including those within the Masterplan Site) as a result of the completed H1 Development.

### Summary Assessment Methodology

- 7.65 In-line with the aforementioned EIA strategy, the relevant baseline conditions for the daylight, sunlight and overshadowing assessment will include the built form of the Approved Development (except for Plot H1 in its outline consented form). Accordingly, the assessment of daylight, sunlight and overshadowing will examine the following test configurations:

1. The existing Site + the Approved Development (except for Plot H1 in its outline consented form) + all significant existing features outside of the Masterplan Site.
2. The H1 Development + the Approved Development (except for Plot H1 in its outline consented form) + all significant existing features outside of the Masterplan Site.
3. The H1 Development + the Approved Development (except for Plot H1 in its outline consented form) + relevant cumulative schemes (refer to **Section 4**) + remaining significant existing features outside of the Masterplan Site.

- 7.66 It should be noted that light pollution and solar glare are not comparative assessments. As such, their existence in the baseline does not validate their occurrence as a result of the H1 Development being built. These will therefore be assessed in absolute terms.
- 7.67 The more specific methodologies to be employed in the assessment of daylight, sunlight, overshadowing, solar glare and light pollution are as follows.

### Daylight, Sunlight, Overshadowing

- 7.68 A daylight, sunlight and overshadowing assessment will be undertaken, following the principles set out in the Building Research Establishment (BRE) guidance 'Site Layout Planning for Daylight and Sunlight' (2011)<sup>27</sup>, and will include consideration and assessment of the potential for significant effects arising from the H1 Development on surrounding sensitive receptors (including those within the Masterplan Site). These will include residential properties with windows facing the Site and amenity areas such as parks and gardens. Cumulative effects and effects on future receptors within cumulative schemes will also be considered.
- 7.69 In line with the BRE Guidelines, vertical sky component (VSC), no-sky line (NSL) and average daylight factor (ADF) (where relevant) assessments will be undertaken for the H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form) for the relevant sensitive receptors identified above.
- 7.70 The sunlight amenity to the surrounding relevant receptors will be considered by reference to the annual probable sunlight hours (APSH) method of assessment. Due to the southerly rotation of the sun, this assessment will consider those rooms with windows facing the site and oriented within 90 degrees of due south.
- 7.71 The nature (beneficial or adverse), scale (insignificant, minor, moderate or major) and ultimately the significance of daylight and sunlight amenity effects will be determined using professional judgement and by reference to Appendix I of the BRE Guidelines.
- 7.72 The overshadowing analysis on the surrounding areas of amenity space will be undertaken by reference to the Transient Overshadowing (TOS) method of assessment.

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<sup>27</sup> Site Layout Planning for Daylight and Sunlight, Paul Littlefair, 2011

7.73 For the TOS assessment, the path of shadow will be mapped for the H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form) on the following dates as suggested by the BRE Guidelines:

- 21st March (Spring Equinox).
- 21st June (Summer Solstice).
- 21st December (Winter Solstice).

7.74 The nature (beneficial or adverse), scale (insignificant, minor, moderate or major) and ultimately the significance of overshadowing effects will be determined using professional judgement and by reference to Section 3 of BRE guidance.

7.75 Residential receptors identified on nearby roads / streets that are considered sensitive in relation to daylight and sunlight and will therefore be included within the assessments. Therefore, the following sensitive receptors include but are not limited to:

- Relevant residential buildings within the Approved Development.
- Existing residential properties along Walworth Road.
- Julian Markham House.
- Strata Tower.

7.76 Areas of amenity space are considered most sensitive to overshadowing effects resulting from the H1 Development in the context for the Approved Development (except for Plot H1 in its outline consented form). Owing to the southerly location of the sun path, only open space areas located from north west through to north east of the site require consideration in relation to overshadowing. Therefore, the following sensitive receptors include but are not limited to:

- The new park associated with the Approved Development.
- Castle Square.

### Solar Glare

7.77 The assessment of solar glare will consider potentially sensitive viewpoints for road users and train drivers surrounding the site. The viewpoints will be selected once the detailed elements of the H1 Development are finalised. For road users, viewpoints are generally located at the minimum stopping distance and at the driver's eye level with the focal point being a relevant traffic element, such as signals or incoming traffic and pedestrian crossings. For train users, viewpoints are generally located on a number of representative locations along the rail tracks at driver's eye level. Should detail of signals be available, these would be considered within the assessment.

- 7.78 The BRE guidelines provide that glare or solar dazzle can occur when sunlight is reflected from a façade or area of metal cladding. This is considered an issue in relation to road users whereby an instance of reflection can obscure the view of traffic signals and thus have the potential to cause an accident.
- 7.79 The assessment of solar glare identifies the time of the day and year that solar reflections will be visible from the assessed viewpoints, as well as their relationship to a driver's line of sight. However, the assessment does not measure the intensity of the reflection, but merely the occurrence and duration.
- 7.80 The nature (adverse), scale (insignificant, minor, moderate or major) and ultimately the significance of solar glare effects will be determined using professional judgement and taking into consideration the duration of solar reflections, location of these in relation to a driver's line of sight and the probability of these occurring.
- 7.81 Solar glare assessments consider potentially sensitive viewpoints for road users and train drivers surrounding the site. The viewpoints will generally be located at the minimum stopping distance and at the driver's eye level with the focal point being a relevant traffic element, such as signals or incoming traffic.
- 7.82 Solar glare assessments are undertaken where the façade detailing is known and the potential for reflections occur on areas of glazed materials. Sensitive viewpoints where the H1 Development is visible within the drivers field of view will therefore be assessed.

### Light Pollution

- 7.83 Light pollution is typically considered an issue where light is emitted from artificial sources, such as highly glazed commercial offices, into residential accommodation where this would cause a nuisance to occupants.
- 7.84 The assessment of light pollution will focus on the effects of light egress from within the glazed office spaces and the subsequent light intrusion on the neighbouring residential receptors (including those within the Masterplan Site). As per standard practice, in the absence of a detailed lighting design, the study will assume an average illuminance level of 500 lux at the working plane as per the Lighting of Workplaces, British Standard (BS) 12464-2:2002.
- 7.85 The ILP Guidance Notes 2011<sup>28</sup> set out numerical criteria for light intrusion before and after curfew (11 pm) based on the lighting environment of the surrounding context. As the Site and the Masterplan Site is located in central urban location, this would be considered an area of high district brightness, equating to Environmental Zone 4 within the ILP Guidance Notes. Where the light levels exceed the recommended levels, a nuisance may occur. The nature (adverse), scale (negligible, minor, moderate or major) and ultimately the significance of Light Pollution effects will be determined using professional judgement and by reference to the ILP Guidance.

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28 Guidance Note for the Reduction of Obtrusive Light, Institution of Lighting Professionals, GN01: 2011

7.86 Light pollution receptors include any residential properties or otherwise sensitive locations which are located within approximately 20 metres of any commercial element of the H1 Development (including those within the Masterplan Site) where potential sources of light intrusion may occur.

## Greenhouse Gasses

### Summary Baseline Information and Key Issues

7.87 Greenhouse gas (GHG) emissions from the current Site are currently unknown. However, in consideration of the existing land-uses of the Site, they are highly likely to be very low. This situation is likely to remain consistent in the likely future baseline situation (in the absence of the H1 Development).

7.88 The H1 Development has the potential to emit GHGs resulting from indirect activities and processes associated with the Works and from its direct operation once fully completed and occupied. This, in theory, may contribute to the effects of global climate change. However, as acknowledged in **Section 8** climate change is global in cause and effect. It therefore follows that by virtue of the scale and nature of the H1 Development, its implementation and operation will not significantly contribute to global climate change. This reasonable assumption is based upon professional judgement and opinion giving due regard to GHG assessments undertaken for projects of a similar scale and nature.

7.89 Despite the above, in view of the political sensitivity regarding GHG emissions, and the fact that at this stage in the planning process, sufficient information does not exist to quantify the GHG emissions likely to arise from the H1 Development, the ES intends to demonstrate and quantify that GHG emissions from the H1 Development will likely be insignificant.

7.90 With further reference to **Section 8**, the following will not be examined within the GHG assessment and are intended to be scoped out of the ES:

- Emissions from specific Works activities associated with the H1 Development,
- Emissions from waste disposal activities associated with the H1 Development (both for the Works and the completed and operational H1 Development).
- Emissions from water use associated with the H1 Development (both for the Works and the completed and operational H1 Development).

### Likely Effects to be Addressed in the ES

7.91 As noted above and within **Section 8**, it is not expected that the H1 Development will significantly contribute to GHG emissions such that significant environmental effects (including climate change effects) will result. However, in view of the political sensitivity regarding GHG emissions, and the fact that at this stage in the planning process,

sufficient information does not exist to quantify the GHG emissions likely to arise from the H1 Development, for completeness, the ES intends to demonstrate and quantify that GHG emissions arising from:

- Embedded carbon associated with the Works, including GHG emissions arising from the manufacture and production of construction materials.
- Carbon emissions from construction traffic associated with the Works.
- Carbon emissions from traffic generated by the completed and operational H1 Development. In the context of the Approved Development (except for Plot H1 in its consented form).
- Carbon emissions associated with the repair, maintenance and refurbishment of the completed and operational H1 Development's built form during its lifetime.
- GHG emissions from the completed and operational energy consumption of the H1 Development.

7.92 In view of the above, the GHG assessment will calculate the GHG emissions (as carbon dioxide equivalent (CO<sub>2</sub>e) for the Works and GHG emissions from the completed and operational H1 Development (referred to as a 'carbon footprint' or 'inventory'). The calculated carbon footprint will be compared to appropriate benchmarks (including Greater London and National GHG emissions) in order to provide context to the scope of the H1 Development's carbon footprint.

## Summary Assessment Methodology

7.93 The assessment will be undertaken in line with the IEMA guidelines<sup>29</sup>, taking account of all relevant national, regional and local policies relating to GHG emissions and climate change, and will include a summary of any inherent mitigation measures designed into the H1 Development to prevent, reduce and offset its GHG emissions.

7.94 The assessment of the Works will utilise the following approaches:

- The embedded carbon from the Works will be calculated using carbon factors published by the University of Bath<sup>30</sup>, which are applied to the individual construction materials used. This will include GHG emissions arising from the manufacture and production of construction materials. This can be used to identify potential low-carbon alternatives, which may be applied as additional mitigation. If the quantum of construction materials is not known at the planning application stage, the embedded carbon emissions will be estimated based on carbon factors published by the Royal Institution of Chartered Surveyors<sup>31</sup>, which will consider the scale and nature of the H1 Development. The assessment of embedded carbon covers 'cradle to gate' emissions (i.e. carbon emissions from the extraction of raw materials through to finished construction products).
- Carbon emissions from construction traffic will be estimated based on predicted construction traffic volumes and average travel distances, or using factors published by the BRE based on project value, depending on the

<sup>29</sup> IEMA, 2017, Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance ([https://www.iaia.org/pdf/wab/EIA%20Guide\\_GHG%20Assessment%20and%20Significance\\_IEMA\\_16May17.pdf](https://www.iaia.org/pdf/wab/EIA%20Guide_GHG%20Assessment%20and%20Significance_IEMA_16May17.pdf))

<sup>30</sup> University of Bath, 2019, Inventory of Carbon and Energy Version 3.0

<sup>31</sup> RICS, 2012, Methodology to calculate embodied carbon of materials, 1st edition.

level of detail in terms of construction traffic volumes and origin / destination available at the time of the assessment.

7.95 The assessment of the completed and operational H1 Development will utilise the following approaches:

- GHG emissions from operational transport will be calculated using the Department of Business, Energy and Industrial Strategy carbon factors for public transport modes<sup>32</sup>, based on passenger km travelled, taking account of more detailed tools for road transport, including Defra's Emissions Factors Toolkit (EFT)<sup>33</sup> and Highway's England Webtag tool<sup>34</sup>.
- Estimating carbon emissions associated with the repair, maintenance and refurbishment of the building during its lifetime, based on data from Royal Institution of Chartered Surveyors<sup>35</sup>.
- GHG emissions from operational energy consumption will be obtained from the stand alone Energy Strategy prepared for the H1 Development, which will be based on the predicted energy consumption (electricity and gas) of the H1 Development.

7.96 In accordance with the aforementioned IEMA guidelines, to provide a conservative assessment, a worst-case approach will be adopted. This will consider the baseline GHG emissions associated with transport and energy from the existing Site to be zero. Accordingly, for the purposes of this assessment, consideration of, and assessment against a set of likely future baseline conditions is not relevant and the maximum carbon footprint of the completed and operational H1 Development will be calculated. Furthermore, a total annual and whole lifetime carbon footprint for the H1 Development will be established.

7.97 The approach to defining the likely significance of effects will be carried out in three steps:

- The first step is to compare the H1 Development's GHG emissions in the opening year to the relevant baseline GHG emissions (refer to above).
- The second step is to compare the calculated change in emissions to local and regional GHG emissions for context.

7.98 The third step applies expert judgment on the significance of those emissions taking into account the changes in emissions, their contribution to local and regional GHG emissions, their consistency with relevant policy, and an evaluation of the mitigation measures proposed to avoid, reduce and compensate and significant GHG emissions.

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32 BEIS, 2020, Greenhouse gas reporting: conversion factors 2020 (<https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2020>)

33 Defra, 2020, Emissions Factors Toolkit (EFT) Version 10.1 (<https://laqm.defra.gov.uk/review-and-assessment/tools/emissions-factors-toolkit.html>)

34 Department for Transport, 2019, Transport Analysis Guidance, TAG Unit A3 Environmental impact appraisal.

35 RICS, 2017, Whole life carbon assessment for the built environment, 1st Edition

## 8. Insignificant Effects to be Scoped out of the ES

### Socio-Economics (Selected Elements Only)

8.1 As noted in **Section 7**, it is proposed to scope the following socio-economic considerations out of the ES.

#### Employment Associated with the Works

8.2 Whilst the employment opportunities created during construction of the H1 Development are likely to be beneficial, they are unlikely to be significant. This is because the construction workforce is highly mobile. Across London construction workers travel on average 16 miles to work. Very few of London's construction workforce live and work in the same borough as a particular construction site. With specific reference to the LBS, the borough is home to a construction workforce of 6,000 workers, and 11,000 residents who work in construction. 67% of LBS's construction workforce commute from across London, and only 10% of those workers based within LBS commute also live within the LBS. This highlights the mobility of the construction workforce in LBS and more generally across London. For this reason, when considering construction effects, the relevant study area is the whole region of London. In 2019 London accommodated 204,500<sup>36</sup> construction workers.

8.3 Based on the same methodology employed within the August 2020 ES<sup>37</sup>, the H1 Development is anticipated to support 1,300 job years during the Works, with an average of 430 workers on-Site over the period of the Works<sup>38</sup>. Only 45 of these workers would reasonably commute from within the LBS (equating to <0.5% of LBS's residents who work in construction). In total around 300 construction workers would commute from across London.

8.4 The August 2020 ES concluded that the 9,208 gross construction job years, equating to 544 net additional FTEs across the economy once leakage, displacement, and multiplier factors have been considered, would equate to a short-term beneficial impact of minor significance.

8.5 These equivalent figures for the H1 Development are around 14% of the Approved Development estimates, and thus, whilst beneficial in nature, are unlikely to be significant in the context of existing levels of construction workers either within the borough, or within London.

8.6 In view of the above, it is considered appropriate to scope out an assessment of construction employment effects from the ES.

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<sup>36</sup> ONS BRES, 2019.

<sup>37</sup> The August 2020 ES used the standard assumption of project capital cost divided by output per construction workforce in order to estimate construction job years supported by the Works. This assessment has used the same approach.

<sup>38</sup> The approximate period of the Works was provided by the Applicant and is assumed to be just under 3 years.

## Construction Worker Spending

- 8.7 Construction workers associated with the H1 Development would spend money locally. However, the 2015 Southwark Retail Study<sup>39</sup> explains the definition of the combined Elephant and Castle and Walworth Road areas to form a Major Centre in the context of retail provision across LBS. This study estimates there to be comparison and convenience retail spending of over £250m within this Major Centre by 2021.
- 8.8 The spending of the construction workforce would be a temporary effect, estimated at approximately £0.5m per annum over the construction period<sup>40</sup>. This would be insignificant (0.2%) in the context of the levels of retail spending in the local area.
- 8.9 In view of the above, it is considered appropriate to scope out and assessment of construction worker spending from the ES.

## Residential and Associated Residential Population Effects

- 8.10 The H1 Development is an entirely commercial scheme. There can therefore be no possibility of any residential effects arising, or effects associated with a new resident population. This includes for effect to local community infrastructure including schools and healthcare facilities.
- 8.11 In view of the above, it is considered appropriate to scope out an assessment of residential and associated residential population effects from the ES.

## Completed and Operational Employment Spending

- 8.12 The H1 Development will generate significant new employment once operational. These workers will spend money locally. A high-level estimate is that they will spend approximately £5.3m<sup>41</sup> each year in the local area. Whilst this will be beneficial to local retailers, in the context of the existing spending levels identified above, this is also likely to be insignificant (a 2% increase).
- 8.13 In view of the above, it is considered appropriate to scope out an assessment of the effects of operational worker spending from the ES.

## Effects to Local Healthcare Provision

- 8.14 Workers can register with local General Practices (GPs) and can also place additional pressure on local Accident and Emergency (A&E) departments. However, most individuals register with a GP near to their place of residence

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39 Nathaniel Lichfield & Partners, Southwark Retail Study, Final Report 2015,

40 This figure has been estimated based on average spending per worker (YouGov), adjusted for construction worker earnings, and average working days.

41 Based on emerging floorspace schedule, HCA employment densities guide (see footnote 7), and YouGov worker spending patterns (refer to footnote 13).

rather than their place of work. Furthermore, GPs can refuse to accept new local workers as patients if they do not have capacity to serve them.

- 8.15 The August 2020 ES identified three hospitals within a 2 km radius of the Site, with one offering an A&E department with sufficient capacity to accommodate growth in patient numbers. When considering this, together with the A&E attendance rates per worker<sup>42</sup>, even in the absence of any new healthcare provision which may be realised by seeking planning approval for land use Class E, it is not anticipated that there will be any significant additional pressure placed upon local healthcare facilities.
- 8.16 In view of the above, an assessment of the additional pressure and likely effects upon healthcare services is proposed to be scope out of the ES.

## Traffic and Transport

- 8.17 The construction of the H1 Development would inevitably lead to additional construction vehicle movements on the highway network and short-term traffic and transport disruption. However, the overall volume of construction traffic is expected to be small in the context of the relevant likely future baseline traffic flows on the surrounding road network. In addition, an outline Construction traffic Logistics Plan (CLP) will be submitted as part of the planning application, which provides a framework to control and manage construction traffic to minimise the impact of construction on the surrounding community. Measures within the CLP will be consistent with, and cognisant of, the requirements of the planning conditions attached to the OPP and accompanying S.106 obligations. As a result, the magnitude of change / impact and therefore effects during the construction phase is predicted to be insignificant, as shown in the traffic and transport assessment in the August 2020 ES.
- 8.18 Given that the increased traffic levels during the Works would be temporary and the mitigation measures to be implemented by managing construction traffic through the implementation of the CLP (secured by planning condition), effects on road users related to delay, safety and amenity are unlikely to be significant.
- 8.19 Once the H1 Development is completed and operational, the majority of person trips to / from the Site will be by public transport and other sustainable travel modes (such as walking and cycling). This is due to the H1 Development being a car free development (other than allocated blue badge spaces to be located on Deacon Street) and excellent accessibility to public transport with a Public Transport Accessibility Level (PTAL) of 6b.

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42 Labour Force Survey (LFS) Estimated incidence and rates of self-reported workplace non-fatal injury sustained in current or most recent job, by industry, for people working in the last 12 months Great Britain (2016/17-2018/19). Office based sectors M Professional, scientific and technical activities and N Administrative and support service activities incidences were 720 and 1,390 per 100,000 workers respectively (data unavailable for industries J, K and L). Weighted by existing employment in Southwark in 2019 (BRES) of 58,000 (M) and 30,000 (N) provides an office worker-based accident rate of 835 accidents per 100,000 workers each year in Southwark. Based on the emerging floorspace schedule and HCA employment densities guide this would result in <50 workplace-based injuries. It is highly unlikely that they would all result in visits to A&E. NHS Digital Hospital Accident & Emergency Activity 2018-19 reports that the Guy's and St Thomas' NHS Foundation Trust had 176,545 A&E attendances in 2018-19. The <50 maximum potential workplace-based injuries would result in an increase of <0.05%.

- 8.20 The Planning Application will be supported by a standalone Transport Assessment (TA), which will provide details of the anticipated total person trips for the H1 Development together with a full multi-modal impact assessment on all transport infrastructure in the vicinity of the Site. A Travel Plan will also be submitted, which would seek to have a beneficial effect on influencing sustainable travel modes at the Site particularly as it will seek to encourage a modal shift from public transport to healthy modes of travel such as walking and cycling.
- 8.21 The increase in operational traffic associated with the H1 Development, on the basis of the areas outlined in **Section 5**, compared against the 2026 likely future baseline traffic flows is shown in **Appendix III** (2026 consistent with the completed Approved Development assessment year considered in the August 2020 ES). For the avoidance of doubt, the likely future baseline traffic flows include for traffic generated by the Approved Development (except for Plot H1 in its outline consented form) and the relevant cumulative schemes as outlined in **Section 4**.
- 8.22 With reference to **Appendix III**, the increase in total vehicles and Heavy Goods Vehicles (HGVs) is shown to be less than 1% on all road links, with the exception of Rodney Place, Deacon Street and Sayer Street, which represents a negligible change in relation to the baseline traffic flows since, in practice, changes of this magnitude would be difficult to differentiate from typical daily/hourly fluctuations in background traffic (the magnitude of change is based on IEMA guidance<sup>43</sup> and professional judgments as per the criteria used in the August 2020 ES).
- 8.23 Rodney Place, Deacon Street and Sayer Street (all identified as low sensitivity receptors in the August 2020 ES) are shown to have larger increases in traffic with the H1 Development in place. However, this is due to the low likely future baseline traffic flows on these roads. Deacon Street and Sayer Street in particular provide the main vehicular access routes to / from the Site. As such, all operational traffic would arrive / depart via these roads. In real terms, these increases are well within the road's capacity.
- 8.24 Given the above, the overall volume of traffic generated by the completed and operational H1 Development, in the context of the Approved Development (except for Plot H1 in its outline consented form) is not expected to give rise to significant traffic and transport effects including severance, driver / pedestrian delay, pedestrian / cycle amenity, fear and intimidation and accidents and highway safety.
- 8.25 In addition to the above, a number of changes to the highway surrounding the Site and the Masterplan Site have already been implemented via the Approved Development. These including the provision of new cycle and pedestrian crossings on Walworth Road, Heygate Street and Rodney Road, which would assist in creating a safer road environment for all road users. The Approved Development also proposes (although not yet implemented) various improvements along Rodney Place such as narrowing the road and the provision of a raised table crossing, which all seek to improve the environment and facilities for pedestrians and cyclists. As such, no significant effects on pedestrian / cycle connectivity and accessibility are anticipated to arise from the H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form).
- 8.26 In view of the above, it is considered appropriate to scope the topic of transport and access out of the ES.

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43 Institute of Environmental Management. Guidelines for the Environmental Assessment of Road Traffic. 1993.

## Air Quality Associated with the Works

- 8.27 The IAQM Guidance for the assessment of construction dust<sup>44</sup> outlines that with the implementation of appropriate mitigation measures for construction sites, impacts from construction dust are not anticipated to result in significant effects. As outlined in **Section 6** a CEMP will be devised and implemented during the Works, which will be secured through a planning condition. This will incorporate appropriate mitigation measures to control construction dust generation, and air quality monitoring during construction, as detailed in guidance<sup>4,45</sup> [Such mitigation measures will be consistent with, and cognisant of, the requirements of the planning conditions attached to the OPP and accompanying S.106 obligations.
- 8.28 As set out in the Traffic and Transport section above, likely traffic effects associated with the Works are unlikely to be significant. In addition, a CLP will be developed as part of the Planning Application which provides a framework to control and manage construction traffic to minimise the impact of construction on the surrounding community.
- 8.29 In view of the above, it is considered appropriate to scope out an air quality assessment of the Works from the ES.

## Noise and Vibration

- 8.30 In line with the DMRB<sup>46</sup>, an increase in traffic flows of 25% / reduction in traffic flows of 20% is likely to result in a change of 1 decibel (dB) at receptors, where road traffic noise is dominant. An increase of 1 dB is adopted to indicate a 'slight' (non-intrusive) change in noise level, with consideration to the Institute of Environmental Management and Assessment (IEMA) guidance<sup>47</sup>. In addition, a change of 3 dB or greater is considered to be 'moderate' (intrusive), which would represent an increase in traffic flows of 100%.
- 8.31 As set out in the Traffic and Transport section above, likely effects from construction traffic during the Works are unlikely to be significant. In addition, the likely percentage change in traffic flows arising from the completed and operational H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form) is anticipated to be significantly less than the 25% threshold on the road network surrounding the Site. This is demonstrated and quantified within **Appendix III**.
- 8.32 A CLP will be developed as part of the Planning Application which provides a framework to control and manage construction traffic to minimise the impact of construction on the surrounding community, and a Travel Plan will also be submitted, which would seek to have a beneficial influence on public transport by encouraging modal shift to healthy modes of travel such as walking and cycling.

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44 Institute of Air Quality Management. Guidance on the Assessment of Dust from Demolition and Construction. 2014

45 Institute of Air Quality Management. Guidance on Monitoring in the Vicinity of Demolition and Construction Sites. 2018

46 Highways England. DMRB Volume 11 Section 3 Part 7 Noise and Vibration (HA213/11). 2011.

47 IEMA. Guidelines for Environmental Noise Impact Assessment. IEMA. 2014.

- 8.33 As such, no significant road traffic noise effects are likely to result from the Works or the completed and operational H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form). Such matters will therefore be scoped out of the ES.
- 8.34 Regarding noise associated with the physical Works required to implement the H1 Development, a CEMP would be secured through a planning condition and will include best practice mitigation measures to ensure that noise and vibration impacts during the Works on surrounding receptors are adequately controlled. Such mitigation measures will be consistent with, and cognisant of, the requirements of the planning conditions attached to the OPP and accompanying S.106 obligations. As such matters will therefore be scoped out of the ES.
- 8.35 Other noise may be associated with the building services plant and the operation of any proposed commercial, retail or open spaces, including any food or drink establishments. Any such uses will generally be located away from existing receptors and will be designed and managed such that sound levels are kept to a practicable minimum. Where necessary, it is assumed that the sound from any such spaces (whether internal or external) would be addressed via planning conditions or LBS's licencing application process. Therefore, plant and non-plant noise-related effects associated with the operation of the H1 Development are not considered to be significant and will be scoped out of the ES.
- 8.36 There are no significant vibration sources on the Site or in sufficient proximity to the Site that give rise to noticeable incidences of existing on-Site vibration, as confirmed in the August 2020 ES. Furthermore, no significant sources of vibration will be introduced by the completed and operational H1 Development. Accordingly, the assessment of vibration in relation to the completed and operational H1 Development will be scoped out of the ES.

## Ground Conditions and Contamination

- 8.37 Existing information pertaining to ground conditions and contamination in relation to the Site and Masterplan Site were established via many assessments undertaken in relation to the OPP, including:
- Multiple Ground Contamination Desk Study and Preliminary Risk Assessments associated with the March 2012 ES, the September 2012 ES Addendum and the August 2020 ES.
  - Intrusive investigations and Geotechnical & Geoenvironmental Interpretive Reports produced in accordance with the OPP planning conditions, such as the Card Geotechnics Limited (CGL) Reports in 2013<sup>48</sup> and 2014<sup>49</sup>.
  - Remediation Strategy, Framework Implementation and Verification Plan published by Peter Brett Associates (PBA) in 2014<sup>50</sup>, and the WYG Letter Reports published between 2016 and 2018.
- 8.38 With reference to this work, a summary of relevant ground conditions and contamination information in relation to the Site is provided as follows.

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48 The Heygate Estate, Elephant and Caste, Geotechnical and Geoenvironmental Interpretive Report, Card Geotechnics Limited, June 2013

49 The Heygate Estate, Main Site, Geotechnical & Geoenvironmental Interpretive Report, Card Geotechnics Limited, September 2014

50 Heygate Estate, Elephant and Castle, Remediation Strategy, Framework Implementation and Verification Plan, PBA May 2014

- 8.39 The combined assessments, including intrusive investigations, identified a variable thickness of Made Ground beneath the Site, underlain by a combination of superficial deposits, comprising potential Alluvium in the north-east area and Kempton Park Gravel across the rest. These superficial materials, in turn, overlie the London Clay Formation (LCF). The desk-based assessments suggest that at depth, the LCF is underlain by the Harwich Formation, the Lambeth Group, the Thanet Formation and the White Chalk Subgroup.
- 8.40 The Kempton Park Gravel Member and the Lambeth Group are classified by the EA as Secondary A Aquifers, which are defined as 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.
- 8.41 The desk-based assessments show that, historically, the Site has featured mixed land use. In the 1800's, the Site was in use as residential premises, before citing a school until the southern part of the Site was redeveloped, between the 1940s - 1960s as an engineering works ('Bedstead Works') and later included a car and lorry park. The Site was returned to residential land use as part of the Heygate Estate in the 1970s - 1980s. The Site is also shown as being at High risk of potential UXO according to freely available online Zetica UXO Risk Maps<sup>51</sup>.
- 8.42 Environmental assessment of samples taken during intrusive investigations identified that there were exceedances of lead in soils across the Masterplan Site as well as copper and asbestos in some locations. Concentrations of selenium and sulphate exceeded criteria in some groundwater monitoring locations, whilst gas screening values were found to correspond to Characteristic Situation CS2. Location TP204B, on the Site boundary, exceeded for a range of determinants including lead, selenium and sulphate, in the vicinity of the historic engineering works.
- 8.43 In view of the above, and in common with the Masterplan Site, hot spots of contamination are likely to be present beneath the Site. However, such issues are common to almost all urban redevelopment projects. Furthermore, legislation dictates that all redevelopment must not adversely impact human health or the wider environment due to ground contamination. As such, all contamination and UXO risks (and associated effects) can be successfully managed and mitigated via various standard means including:
- Further Site Investigation (SI), if necessary, to further investigate, qualify and quantify the potential for contamination at the Site.
  - Based on the SI findings, if necessary, the preparation of an appropriate remediation strategy to be agreed in conjunction with the LBS and the EA to ensure the Site is entirely appropriate for its end-use and causes no contaminative risks (and therefore effects) to human health and the environment.
- A Remediation Strategy (PBA, 2014)<sup>50</sup> was prepared for the Masterplan Site. This is summarised as follows and it is envisaged that any necessary Remediation Strategy for the Site will be similar:
- The Remediation Strategy was designed to break the pathway between source and receptor e.g. provision of hard surfacing or capping measures to soft landscaping, gas protection to buildings, protective design measures in construction of structures and infiltration drainage systems (SUDs).

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51 <https://zeticauxo.com/downloads-and-resources/risk-maps/>

- The Remediation Strategy proposed a reactive approach to earthworks to allow for any unforeseen significant contamination that may be encountered to be appropriately dealt with under the guidance of a qualified and competent contaminated land consultant.
- The selection and employment of construction techniques that minimise contaminative risks, particularly with regard to intrusive works such as piling. In addition, any construction and remedial works will need to be carried out without creating new hazards to the operational areas of the site, with residents now occupying the buildings.
- Adherence to relevant legislative and best practice construction mitigation measures to ensure a well-managed operation which minimises potential environmental risks to all receptors. To this end, a CEMP will be devised and implemented during the Works. As previously noted, the CEMP will be consistent with, the requirements of the planning conditions attached to the OPP and accompanying S.106 obligations. As such, it will outline management procedures for pollution prevention, hazardous materials storage, requirements for risk assessments and method statements (accounting for UXO matters), use of materials on-Site and the disposal of materials from the Site. The CEMP would outline health and safety requirements for workers who may encounter contaminants. As noted within **Section 6**, an outline CEMP will be included within the E S.
- Implementation of a surface water drainage strategy, including petrol / sediment interceptors.

8.44 All of the above can be secured by standard planning conditions and would be expected to be so in line with the requirements of the planning conditions attached to the OPP and accompanying S.106 obligations. As such, and based upon the tried and tested effectiveness of the above, and in view of the fact that the completed and operational H1 Development will not introduce contaminative land uses or activities to the Site, it is not anticipated that the H1 Development will give rise to significant contamination risk or effects.

8.45 In view of the above, it is considered appropriate to scope out an assessment of ground conditions and contamination from the ES. Nonetheless, to adhere with planning (not EIA) requirements, a Phase 1 Geo-Environmental Assessment for the Site will be submitted in respect of the detailed Planning Application for the H1 Development.

## Archaeology (Below Ground Heritage)

8.46 Existing information pertaining to archaeology (below ground heritage) in relation to the Site and the Masterplan Site were established via various assessments undertaken in relation to the OPP, including:

- Multiple Archaeological Desk Based Assessments associated with the March 2012 ES, the September 2012 ES Addendum and the August 2020 ES.
- Watching briefs and archaeological evaluation in accordance with the OPP planning conditions.

8.47 With reference to this work, a summary of relevant archaeological (below ground heritage) information in relation to the Site is provided as follows.

- 8.48 There are no known designated or non-designated archaeological remains within the Site. The Site does not lie within or adjacent to an Archaeological Priority Area (APA). Furthermore, there are no known archaeological remains within the Site.
- 8.49 The Site is located within the Thames floodplain in the early prehistoric period. However, no brickearth / alluvial horizons were noted in borehole data from the Site and its surrounds (including within the Masterplan Site). The recording of Made Ground deposits directly above London Clay or River Terrace Gravels indicates truncation of the prehistoric horizon in the post-medieval period. This supports the archaeological findings immediately north of the Site which suggest the Terrace Gravels slope down from south to north, with preserved prehistoric deposits towards the north (towards New Kent Road). As such, there is considered to be a low potential for buried prehistoric remains within the Site.
- 8.50 There is a theoretical potential for Roman remains beneath the Site due to the presence of the Roman road located approximately 120 m west of the Site. However, no Roman burials were recorded during the 2011 archaeological investigations immediately north of the Site (summarised in the March 2012 ES<sup>52</sup>). A significant cut feature was identified to the north of this Site, with a single possible ditch terminus in the south of the Site. A single fragment of tegula was recovered from the fill and was the only datable find from the feature. Taking into consideration the aforementioned slope of the Terrace Gravels and the results of the borehole data, there is considered low potential for Roman occupation evidence within the Site. However, the presence of truncated / isolated landscape features of local significance, similar to the possible ditch terminus recorded to the north, cannot be ruled out entirely.
- 8.51 There is considered to be low potential for in situ remains of early medieval or medieval date, due to 19th century development, which was comprehensive across the Site.
- 8.52 There is high potential for archaeological remains from the post-medieval – modern period to survive within the Site. Remains are likely to comprise demolition layers associated with the Victorian residential, retail and industrial buildings which stood the Site and Masterplan Site prior to the Heygate Estate. These are unlikely to comprise in situ foundations / ground surfaces and are therefore not considered to be heritage significance. Considering the density of Victorian development within the Site, the potential for well-preserved remains pre-dating the mid-19<sup>th</sup> century is likely to be low.
- 8.53 The resulting groundworks associated with the H1 Development will involve the removal of late post-medieval demolition layers of negligible heritage value. The H1 Development may also result in the loss of truncated / isolated Roman landscape features of local significance, although the potential for such remains is considered low.
- 8.54 Intrusive activities associated with the Works could have the potential to truncate and / or remove archaeological remains. However, as identified above, the archaeological potential of the Site is considered to be low. Consequently, further archaeological works are considered to be unnecessary.

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52 MOLA 2011 Oakmayne Plaza (Formerly Elephant Road) London SE1 (Site Code ERD07): A report on the archaeological evaluation

8.55 It is therefore proposed to scope an assessment of archaeology out of the ES. Nonetheless, to adhere with planning (not EIA) requirements, an Archaeological Desk Based Assessment for the Site will be submitted in respect of the Planning Application for the H1 Development.

## Water Resources and Flood Risk

8.56 There are no surface water features within or in proximity to the Site. The closest main river to the site is the River Thames which is located approximately 1.3 km north of the Site. According to the EA, the Site is located within Flood Zone 3 (high risk of flooding). However, it is shown to lie within an area benefitting from the River Thames Flood Defences. From reviewing detailed flood data provided by the EA for the Site, it is confirmed that the western part of the Site is located within the modelled breach zone for the year 2100 (in accordance with Thames Tidal Breach Inundation Modelling Study 2017 completed by Atkins (May 2017)).

8.57 The EA's surface water (pluvial) flood risk mapping<sup>53</sup> identifies that the Site has a very low to low risk of flooding from this source.

8.58 Southwark's Strategic Flood Risk Assessment (SFRA)<sup>54</sup> includes a map of areas at risk of groundwater flooding which indicates that the Site has the potential for groundwater flooding to occur at surface. Groundwater flood risk will relate to shallow perched groundwater within the Kempton Park Gravels and Alluvium beneath the Site.

8.59 A review of the SFRA and EA flood maps, has identified that there are no other significant sources of flooding at the Site, i.e. from reservoirs or sewers.

8.60 According to the SFRA, a Critical Drainage Area (CDA) is a "...discrete geographic area (usually a hydrological catchment) where multiple and interlinked sources of flood risk cause flooding in one or more Local Flood Risk Zones during severe weather thereby affecting people, property or local infrastructure". However, from reviewing the SFRA, it has been concluded that the Site is not located in a CDA.

8.61 The implementation of an appropriate Surface Water Drainage Strategy (to be developed as part of the normal design process for the H1 Development by the Applicant's Drainage Consultant (Robert Bird Group)) will seek to reduce the risk of surface water flooding as part of the H1 Development. This H1 Development Surface Water Drainage Strategy will be cognisant of the wider Approved Development Surface Water Drainage Strategy so that both can work together across the totality of the Site and the Masterplan Site. Run-off will be managed by the collection of surface water, attenuation and controlled discharge at agreed rates, with an allowance for climate change in line with policy and best practice guidance. This will aim to provide a betterment in surface water run-off rates when compared with the existing situation.

8.62 A CEMP will be implemented during the Works which will set out key controls / management practices (including measures such as Flood Management / Evacuation Plan), to ensure the safety of construction workers on-Site.

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<sup>53</sup> <https://flood-warning-information.service.gov.uk/long-term-flood-risk>

<sup>54</sup> London Borough of Southwark Strategic Flood Risk Assessment, January 2017

Such measures will be consistent with, and cognisant of, the requirements of the planning conditions attached to the OPP and accompanying S.106 obligations. As part of the completed H1 Development, standard flood resilience measures will be included such as those detailed within British Standard 85500:2015. As noted within **Section 6**, an outline CEMP will be included within the ES.

- 8.63 There is the potential for increased water demand during both the construction and operational phases of the H1 Development. However, it is considered that this would not be significant in the context of the water demand within the LBS. In addition, it is the duty of Thames Water, as the statutory provider, to ensure adequate supply / capacity. As such, effects related to water supply are not considered to be significant.
- 8.64 In terms of wastewater infrastructure it is also the statutory duty of Thames Water to ensure that adequate wastewater capacity / infrastructure is provided for the H1 Development. It is anticipated that the increase in foul flows in relation to the foul sewerage capacity as a result of the H1 Development would not be significant in the context of the current foul water flows generated by the land-uses within the surrounding area. In addition, the environmental effects of the increase in foul water will be controlled through the discharge consent or permit associated with the local sewer treatment works. As such, effects related to foul water are not considered to be significant.
- 8.65 In line with policy requirements, a National Planning Policy Framework (NPPF) compliant Flood Risk Assessment (FRA) will be undertaken to support the Planning Application. The FRA will include the following:
- Details of any historical flooding events (from all sources).
  - Acceptability of the proposed land use in relation to known flood zones, breach zones and proximity to watercourses with appropriate mitigation measures outlined as necessary.
  - Effects to / benefits of flood defences including assessment of breach scenarios.
  - Volume of surface water runoff likely to be generated by the H1 Development.
  - Details of existing and proposed sustainable drainage systems (SuDS) including appropriate water quality requirements.
  - Safe access and egress arrangements.
  - Climate change effects.
- 8.66 The FRA will demonstrate the most appropriate Sustainable Urban Drainage Systems (SuDS) for the H1 Development. The FRA and Surface Water Drainage Strategy will be informed by detailed consultation with the LBS, the EA and Thames Water.
- 8.67 Based on the evidence to date, effects relating to water resources and flood risk are not considered to be significant. As such, it is considered appropriate to scope this topic out of the ES. However, as noted above, to accord with planning policy requirements, an FRA and Surface Water Drainage Strategy will be produced as a stand-alone report to support the Planning Application. Furthermore, details of the Surface Water Drainage Strategy will be set out within **ES Volume 1, Chapter 5: The Development**.

## Ecology

- 8.68 A Preliminary Ecological Appraisal (PEA) of the Site comprising an ecological data search, an 'Extended' Phase 1 Habitat Survey and Preliminary Bat Roost Assessment (PBRA) was completed in November 2020 by the Applicant's ecologist (Tyler Grange Ltd). The results of this work are included within the Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment Report 13526/R01 presented within **Appendix IV**. A summary of results is as follows.
- 8.69 The Site does not comprise any statutory or non-statutory sites of nature conservation. Twelve non-statutory sites designated Sites of Importance for Nature Conservation (SINCs) are located within 1km of the Site. The closest SINC to the Site is Victory Park and Elba Place Nature Garden, located approximately 0.2km east of the Site. The Site is not covered or directly adjacent to any statutory or non-statutory designated sites
- 8.70 All of the statutory and non-statutory sites are separated from the Site by significant built form and transport infrastructure, with no connecting habitats. It is considered that any increases in noise, light or air pollution as a result of the H1 Developments would be localised and would not be significant in the context of the wider urban area. As such, it is considered that the statutory and non-statutory designated sites will not be affected by the H1 Development in the context of the Approved Development (except for Plot H1 in its outline consented form), which is consistent with conclusions of the August 2020 ES.
- 8.71 With regard to habitats on the Site, the 'Extended' Phase 1 Habitat Survey identified the dominant habitats within the Site comprised buildings, hardstanding and bare ground with smaller areas of introduced shrub, scattered scrub, tall ruderal, improved grassland and scattered trees.
- 8.72 The scattered scrub and scattered trees have potential to support small numbers of nesting birds. Any potential conflict with breeding birds during the Works can be avoided via the removal of vegetation outside of the primary bird nesting period (i.e. between the beginning of September and the end of February). Alternatively, vegetation could be removed during the bird nesting season, but only following a survey undertaken by a suitably qualified ecologist to confirm that active nests are not present. Such avoidance mechanisms can be controlled by standard planning conditions.
- 8.73 Given the extent and type of habitats on Site, invertebrate assemblages are considered likely to be limited to common invertebrate species only and / or of insufficient size or diversity for significant effects to occur.
- 8.74 All structures and trees within the Site are considered to be of negligible suitability for roosting bats following the PBRA and habitats within the Site offer limited foraging opportunities for bats.
- 8.75 The Site is generally considered to offer limited opportunities for notable and legally protected species.
- 8.76 Considering all information presented above, it is highly unlikely that the works will give rise to any significant effects on ecological features. As such, it is considered appropriate to scope out the topic of ecology from the ES.

However, in order to accord with planning policy (not EIA) requirements, the Planning Application will be supported by an Ecological Impact Assessment, accounting for the full details of the final and fixed H1 Development.

## Greenhouse Gasses (Selected Elements Only)

8.77 As noted in **Section 7**, it is proposed to scope the following GHG considerations out of the ES.

### Emissions from Specific Works Activities

8.78 Estimating carbon emissions from the Works, including the energy and fuel use associated with construction plant and facilities is acknowledged to be uncertain and only forms a small component of a development's lifetime carbon emissions. Emissions from specific Works activities associated with the H1 Development are therefore intended to be scoped out of the assessment.

### Emissions from Waste Disposal Activities Associated with the Works and the Completed and Operational H1 Development

8.79 GHG emissions from the treatment and disposal of waste materials during both construction and operation are a very small component of the carbon footprint of a development in general and will be minimised via standard best practice including the implementation of Site Waste Management Plans (SWMPs) which will be consistent with, and cognisant of, the requirements of the planning conditions attached to the OPP and accompanying S.106 obligations. Such plans will encourage the use of the Waste Hierarchy approach to reduce waste being sent to landfill and prioritise the reuse of material. Accordingly, it is intended to scope out waste disposal emissions from the assessment.

### Emissions from Water Use Associated with the Works and the Completed and Operational H1 Development

8.80 The carbon footprint also excludes GHG emissions associated with water use (including water treatment and supply (pumping)) as emissions are expected to result in very small contributions to the total carbon footprint (small contributions less than 5% of a development's carbon footprint can be omitted<sup>29</sup>).

## Climate Change

8.81 Climate change is a global issue in cause and effect. It therefore follows that by virtue of the scale and nature of the H1 Development, its implementation and operation will not significantly contribute to global climate change. However, as far as practicably possible the H1 Development will be designed to minimise GHG emissions and to ensure resilience to climate change.

- 8.82 As outlined in **Section 7** and above, an appropriately scoped GHG assessment will be included within the ES. However, this assessment is only being scoped into the ES due to the political sensitivity associated with GHG emissions, and the fact that at this stage in the planning process, sufficient information does not exist to quantify the GHG emissions likely to arise from the H1 Development. However, based upon professional judgement and opinion, giving due regard to GHG assessments undertaken for projects of a similar scale and nature, it is fully expected that the GHG assessment will demonstrate no significant GHG emissions or associated effects, including climate change effects.
- 8.83 With regard to climate change resilience, as noted earlier in this section the Applicant's Flood Risk and Surface Water Drainage Consultant (RMA Environmental) is informing the design of the H1 Development to ensure inherent design measures will safeguard against flooding risks and effects at the Site and elsewhere, even accounting for climate change. Accordingly, the ES will include a summary description of such inherent design features as part of the description of the H1 Development (refer to **Section 6**).
- 8.84 In view of the above, the H1 Development is not anticipated to significantly affect climate change. However, the description of the H1 Development to be provided within the ES will set out how the H1 Development will be designed to ensure resilience to climate change.

## Risk of Major Accidents and Disasters

- 8.85 The Site and its environs are situated in an area with a maximum radon potential of less than 3%<sup>55</sup> (with no protective measures required for new properties) and are not affected by historic coal mining<sup>56</sup>. The Site is also not subject to any high-pressure gas mains<sup>57</sup> or within three miles of a Control of Major Accidents and Hazards (COMAH) site.
- 8.86 Implementation of a CEMP and adherence to legislative requirements will ensure the Works do not give rise to significant risks associated with contamination (including UXO) and flooding. In addition, all works will be undertaken in line with the Construction (Design and Management) Regulations 2015<sup>58</sup>.
- 8.87 In addition to the above, the completed and operational H1 Development does not propose any land uses that will increase the risk of major accidents and disasters. In this respect, the H1 Development will be designed in accordance with all relevant health and safety requirements and, as previously noted will ensure no significant contamination risk or flood risk to future on and off-Site receptors.

## Health and Wellbeing

- 8.88 During the Works, all best-practice and legislative requirements necessary to protect the environment and human health will be implemented. This will include mandatory adherence to a CEMP (refer to **Section 6**). It therefore

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55 <https://www.ukradon.org/information/ukmaps>

56 <http://mapapps2.bgs.ac.uk/coalauthority/home.html>

57 <https://www.nationalgrid.com/uk/about-grid/our-networks-and-assets/gas-network-route-maps>

58 Health and Safety Executive (HSE). The Construction (Design and Management) Regulations. 2015.

follows that the health and wellbeing of construction workers, local residents, local workers and visitors to the locality is unlikely to be significantly affected by the Works.

8.89 Via the iterative EIA and design process (refer to **Section 6**) the Applicant is committed to achieving the most practicable sustainable design including minimising the likely significant adverse environmental effects of the H1 Development and maximising the likely significant beneficial effects of the H1 Development. Part of this work will focus on ensuring:

- The H1 Development is suitable for its intended land-use from a ground conditions and contamination perspective (refer to above).
- The H1 Development provides acceptable air quality conditions to on and off-Site human receptors.
- The H1 Development provides acceptable noise and vibration conditions.
- The H1 Development provides a comfortable and safe wind microclimate.
- The H1 Development provides acceptable daylight, sunlight and overshadowing conditions.

8.90 In addition to the above, with reference to **Section 5**, the H1 Development will include the provision of public realm / open space within the Development which will allow for physical activity.

8.91 Whilst all of the above can contribute to promoting and encouraging healthy lifestyles and wellbeing, there is currently no widely accepted methodology for the assessment of health and wellbeing and no known robust methodology to benchmark quantify and qualify the implications of the above upon health and wellbeing. That said, it is reasonable to assume that the implications of the completed and operational H1 Development upon health and wellbeing will be no worse than insignificant. Consequently, the ES will not provide an impact assessment of human health and wellbeing. However, **ES Volume 1, Chapter 5: The Development** will provide a factual description of all inherent features of the H1 Development that will likely contribute to the promotion and encouragement of healthy lifestyles.

## 9. Proposed Structure of the ES

9.1 The proposed structure of the ES is set out as follows:

- ES Volume 1 - Main Text and Figures:** This will contain the key findings of the EIA process undertaken in respect of the H1 Development. Based upon the EIA Regulations, best-practice and the ES scoping analysis presented in this EIA Scoping Report, the content of ES Volume 1 is anticipated to be as shown in **Table 4**.
- ES Volume 2 - Townscape, Visual and Above Ground Heritage Effects:** This will contain the key findings of the townscape, visual and heritage (above ground setting) effects assessment undertaken by Tavernor Consultancy, supported by Cityscape. The assessment will be presented in its own ES Volume due to the size and presentational requirements of the assessment.
- ES Volume 3 - Appendices:** Volume 3 of the ES will provide the detailed supporting data, information and the full text of all relevant technical assessments undertaken as part of the EIA process.
- ES Volume 4 - Non-Technical Summary:** The Non-Technical Summary (NTS) will provide an accurate, balanced and non-technical account of the key information provided in the ES. The NTS will be produced as a stand-alone document suitable for public dissemination.

**Table 4: The Proposed Structure of ES Volume 1**

ES Chapter (within ES Volume 1)	Author
1. Introduction.	Avison Young.
2. EIA Methodology.	Avison Young.
3. Existing and Likely Future Land Uses and Activities.	Avison Young.
4. Alternatives and Design Evolution.	Avison Young and the Design Team.
5. The Development.	Avison Young and the Design Team.
6. The Works.	Avison Young and the Applicant.
7. Socio-economics.	Volterra.
8. Air Quality.	Air Quality Consultants.
9. Wind Microclimate.	RDWI.
10. Daylight, Sunlight and Overshadowing	GIA.
11. Greenhouse Gasses.	Air Quality Consultants.

ES Chapter (within ES Volume 1)	Author
12. Effect Interactions	Avison Young

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# Appendix I

## Indicative Plot Construction Programme

**Table A1: Indicative Plot Construction Programme**

	Phase					
	Mp1	Mp2	Mp3	Mp4	Mp5a	Mp5b
<b>Plots</b>	H6	H2	H4	H11a	H7	H1
	H10	H3	H5	H11b		
	H12		PAV.1			
	H13					
<b>Park delivery</b>	Temporary Park		Park Phases 1 and 2	Park Phase 3		Park Phase 4
<b>Anticipated construction timescales</b>	Q1 2015 – Q3 2018	Q1 2016 – Q2 2019	Q4 2018 – Q4 2022	Q1 2020 – Q4 2024	Q3 2021 – Q3 2024	Q4 2022 – Q4 2025
<b>Cumulative residential units</b>	360 units	955 units	1,784 units	2,265 units	2,689 units	2,689 units

This phasing plan is currently under determination by LBS, the H1 Development EIA and ES will take into account the final approved version of the plan once it is determined.

Appendix II  
Proposed Views

## Elephant Park H1: Proposed townscape views for assessment V6

<b>View</b>	<b>Description</b>	<b>Render/Wireline/Appendix (unverified test views)</b>
1	1 Alexandra Palace (LVMF London Panorama 1A.2)	A
2	2 Kenwood (LVMF London Panorama 3A.1)	A
3	3 Parliament Hill (LVMF London Panorama 2A.2)	A
4	4 Primrose Hill (LVMF London Panorama 4A.2)	A
5	5 Serpentine Bridge, Hyde Park (LVMF Townscape View 23A.1)	W
5.2	5.2 Serpentine Bridge Kinetic Sequence position 2	W
5.3	5.3 Serpentine Bridge Kinetic Sequence position 3	W
5.4	5.4 Serpentine Bridge Kinetic Sequence position 4 (Winter)	R
7	Waterloo Bridge (LVMF River Prospect LVMF15b.1)	A
12	Borough High Street, Junction with Newcommen Street	A
14	Trinity Church Square	A
17	Newington Gardens	W
18	New Kent Road	W
25	Camberwell Road South	A
27	Walworth Road at the Junction with Manor Place	R
28	Walworth Road at the Junction with Browning Street	A
29	Pasley Park (Surrey Gardens)	W
30	Penton Place	R
34	Walcot Square	A
35	Brook Drive	W
38	Westminster Bridge Road	A
39	St Georges Road	W
40	Waterloo Road	A
41	St George's Circus	R
50	London Road	W
51	Elephant Road	R
55	Heygate St, junction with Rodney Place	R
57	Walworth Road, junction with Steadman Street	R
58	St Mary's Churchyard	R

# Appendix III

## H1 Development Traffic Flows

## Elephant Park Plot H1 Traffic Data

### Change in Traffic Flows (2026 AADT)

Road Link	2026 AADT Baseline		Development Trips		% Increase	
	Total Vehs	HGVs	Total Vehs	HGVs	Total Vehs	HGVs
St George's Road **	11,079	1,555	23	5	0.2%	0.3%
London Road	11,560	4,838	22	5	0.2%	0.1%
Newington Causeway **	13,353	3,139	20	4	0.1%	0.1%
Meadow Row	2,119	355	0	0	0.0%	0.0%
Falmouth Road	859	70	0	0	0.0%	0.0%
Harper Road **	3,216	974	0	0	0.0%	0.0%
Rodney Rd (N of Balfour St) **	6,537	1,642	34	8	0.5%	0.5%
Rodney Rd (S of Balfour St)	8,967	2,120	34	8	0.4%	0.4%
Munton Road	2,224	184	0	0	0.0%	0.0%
Rodney Place	1,636	83	13	3	0.8%	<b>3.9%</b>
Balfour Street	950	162	0	0	0.0%	0.0%
Walworth Rd (N of Heygate St)	16,093	4,505	101	21	0.6%	0.5%
Walworth Rd (S of Heygate St)	11,887	2,020	47	11	0.4%	0.5%
Heygate Street	6,747	1,041	47	11	0.7%	1.0%
Steedman Street	1,512	103	0	0	0.0%	0.0%
Hampton Street	875	153	0	0	0.0%	0.0%
Kennington Park Road	23,794	1,590	18	4	0.1%	0.2%
Kennington Lane	16,740	857	18	4	0.1%	0.4%

Newington Butts	35,437	2,628	37	7	0.1%	0.3%
Elephant and Castle	37,581	5,648	72	14	0.2%	0.3%
New Kent Rd (W of Elephant Rd)	33,478	3,516	33	7	0.1%	0.2%
New Kent Rd (W of Rodney Pl)	33,554	3511	33	7	0.1%	0.2%
Wadding Street	2,992	298	0	0	0.0%	0.0%
Stead Street	2,862	241	0	0	0.0%	0.0%
New Kent Road (west of A2)	33,414	3,527	20	4	0.1%	0.1%
Old Kent Rd (N of Mandela Wy)	37,619	3,725	7	1	0.0%	0.0%
Tower Bridge Road	25,148	1,440	7	1	0.0%	0.1%
Great Dover Street	13,292	838	7	1	0.0%	0.2%
Elephant Road **	1,416	109	0	0	0.0%	0.0%
Walworth Road (North of Deacon Street)	16,093	4,505	109	21	0.7%	0.5%
Deacon Street	307	0	186	43	<b>60.7%</b>	<b>100.0%</b>
Sayer Street	307	0	16	0	5.1%	0.0%

\*\*Medium sensitivity

## Change in Traffic Flows (2026 AAWT)

Road Link	2026 AAWT Baseline		Development Trips		% Increase	
	Total Vehs	HGVs	Total Vehs	HGVs	Total Vehs	HGVs
St George's Road **	9 849	1,360	31	7	0.3%	0.5%
London Road	10,277	4,232	30	6	0.3%	0.1%
Newington Causeway **	11,876	2,746	27	5	0.2%	0.2%
Meadow Row	1,991	329	0	0	0.0%	0.0%
Falmouth Road	810	65	0	0	0.0%	0.0%
Harper Road **	2,940	863	0	0	0.0%	0.0%
Rodney Rd (N of Balfour St) **	6,055	1,518	46	10	0.8%	0.7%
Rodney Rd (S of Balfour St)	8,468	1,977	46	10	0.5%	0.5%
Munton Road	2,040	168	0	0	0.0%	0.0%
Rodney Place	1,526	69	17	4	1.1%	<b>6.3%</b>
Balfour Street	868	148	0	0	0.0%	0.0%
Walworth Rd (N of Heygate St)	13,795	3,796	136	29	1.0%	0.8%
Walworth Rd (S of Heygate St)	9,417	1,548	63	15	0.7%	0.9%
Heygate Street	6,268	945	63	15	1.0%	1.5%
Steedman Street	1,413	97	0	0	0.0%	0.0%
Hampton Street	788	141	0	0	0.0%	0.0%
Kennington Park Road	21,149	1,390	25	5	0.1%	0.4%
Kennington Lane	14,883	748	25	5	0.2%	0.7%
Newington Butts	31,506	2,295	50	10	0.2%	0.4%
Elephant and Castle	33,418	4,934	97	19	0.3%	0.4%
New Kent Rd (W of Elephant Rd)	29,769	3,066	44	10	0.1%	0.3%

New Kent Rd (W of Rodney PI)	29,836	3,062	44	10	0.1%	0.3%
Wadding Street	2,830	281	0	0	0.0%	0.0%
Stead Street	2708	246	0	0	0.0%	0.0%
New Kent Road (west of A2)	29,691	3,084	27	5	0.1%	0.2%
Old Kent Rd (N of Mandela Wy)	33,421	3,259	9	2	0.0%	0.1%
Tower Bridge Road	22,343	1,259	9	2	0.0%	0.1%
Great Dover Street	11,811	732	9	2	0.1%	0.2%
Elephant Road **	1,236	92	0	0	0.0%	0.0%
Walworth Road (North of Deacon Street)	13,795	3,796	147	29	1.1%	0.8%
Deacon Street	261	0	251	58	<b>96.2%</b>	<b>100.0%</b>
Sayer Street	261	0	21	0	8.1%	0.0%

\*\* Medium sensitivity

Appendix IV

Preliminary Ecological Appraisal



Preliminary Ecological Appraisal and Preliminary Bat Roost  
Assessment Report

**H1, Elephant Park**

<b>Report No:</b>	<b>Date</b>	<b>Revision</b>	<b>Author</b>	<b>Checked</b>
13526_R01	24 <sup>th</sup> November 2020	a	Amber Perrett BSc ACIEEM	Nathan Jenkinson MSc MCIEEM

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## Contents

Summary	
Section 1: Introduction and Site Context	1
Section 2: Methods	2
Section 3: Ecological Features and Evaluation	6
Section 4: Preliminary Bat Roost Assessment	14
Section 5: Discussion and Recommendations	21
Section 6: Conclusions	23
References	24

## Appendices

Appendix 1: Site and Masterplan Site Boundaries

Appendix 2: Planning & Legislative Context

Appendix 3: Ecology Survey Planner

## Plan

Habitat Features and Preliminary Bat Roost Assessment Plan: 13526/P01

## Summary

- S.1. This report has been prepared by Tyler Grange Group Limited on behalf of Avison Young. It sets out the findings of an update Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) of a parcel of land (Plot H1) hereafter referred to as 'the Site located within the Elephant Park Masterplan Site,'.
- S.2. The purpose of this report is to set out the ecological baseline of the Site and outline any ecological considerations in the context of the construction works, hereafter referred to as 'the Works', which involves the construction of a multi-storey commercial building.
- S.3. A data search was completed by obtaining biological records from Greenspace information for Greater London (GiGL) and freely available online datasets. The data search confirmed that the Site is not covered or directly adjacent to any statutory or non-statutory designated sites. No impacts on designated sites are anticipated as a result of the Works.
- S.4. The data search returned a small number of records of protected and notable bat, bird, invertebrate and plant species within the search area. No records were returned from within the Site and the Site provides limited opportunities for protected and notable species. A small number of records of invasive species were recorded approximately 0.1km from the Site. An Environmental Statement prepared by Greengate Environmental Ltd in August 2020 for the Masterplan Site conclude that further development will have a negligible impact on the existing habitats within the Masterplan Site and designated sites in the wider area.
- S.5. An extended Phase 1 habitat survey and Preliminary Bat Roost Assessment (PBRA) was completed on 05th November 2020. The extended Phase 1 habitat survey identified that the Site is predominately formed of hardstanding and bare ground, with small areas of improved grassland, scattered scrub, introduced shrub and seven scattered broadleaved trees. One species listed on the London Invasive Species initiative was noted within the Site (*Buddleija davidii*).
- S.6. All structures and trees within the Site were assessed as being of negligible suitability for roosting bats. Small areas of the Site are considered suitable for nesting birds and common and widespread invertebrate species. Therefore, recommendations are made to comply with legislation relevant to nesting birds are made.
- S.7. Enhancements may be made by retaining log piles and existing trees where possible, planting of native shrubs and trees, removing of invasive species and incorporating nest boxes for birds and bats into designs where possible, in alignment with the Southwark Local Plan. It is expected that such measures will be covered within a Construction Environment Management Plan (CEMP) which will be prepared for the Site.

# Section 1: Introduction and Site Context

## Introduction

- 1.1 This Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) report has been prepared by Tyler Grange Group Ltd on behalf of Lendlease Ltd in relation to plot H1, a parcel of land within the wider Elephant Park Masterplan Site, London. Plot H1 is hereafter referred to as 'the Site'. The Site is centred on Ordnance Survey (OS) grid reference TQ 32127 78855 and is approximately 0.7 hectares in size. The extent of the Site is indicated by a red line in **Appendix 1**, in addition to the Masterplan Site boundary (indicated by a blue line) which includes other development plots.
- 1.2 The proposed development is for construction of a multi-storey commercial building within the Site. Outline Planning Permission ('OPP') (reference: 12/AP/1092) was granted for the Elephant Park Masterplan Site in March 2013. Reserved Matters Applications (RMA) have been approved for all but the Site. In the OPP the Site was identified as a residential plot but with retail/business, community, leisure permitted at lower levels. The Site is the last plot to be approved in detail and it is proposed that this will now be an entirely commercial plot. Permission will be applied for through a new 'drop-in' application for the Site. This report therefore focusses on the Site (plot H1) although information on the wider Masterplan Site was sought for background context, see below.
- 1.3 An Environmental Statement (ES) (2020) (hereafter referred to as the August 2020 ES), PEA (2019) and monitoring reports (2016-2019) relating to bats, birds and invertebrates, all prepared by Greengage Environmental Ltd for the Masterplan Site, were reviewed. The August 2020 ES and PEA report focusses on the entire Masterplan Site while the monitoring reports focus solely on those areas of the Masterplan Site which have been developed.
- 1.4 The Ecology chapter of the Greengage Environmental Ltd August 2020 ES report concluded that *"a local permanent positive impact of minor significance was anticipated for bat, bird and invertebrate species within the Masterplan Site. The construction works associated with the future plots of the development will have a negligible (insignificant) impact on the existing habitats on Site as well as the nearby SINC."*

## Purpose

- 1.5 The purpose of this report is to set out the ecological baseline of the Site and outline any ecological considerations that are required in relation to the Site's future development. This report:
- Forms a PEA and PBRA report, presenting the results of an extended Phase 1 habitat survey, PBRA and a review of available background data to describe and evaluate the ecological features present within and surrounding the Site;
  - Describes actual or potential ecological issues and opportunities that might arise as a result of demolition and construction activities, hereafter referred to as 'the Works'; and
  - Where appropriate, makes recommendations for mitigation of adverse effects and ecological enhancement, to ensure conformity with policy and legislation.
- 1.6 This assessment and the terminology used are consistent with the 'Guidelines for Ecological Impact Assessment in the UK and Ireland' (CIEEM, 2019).

## Section 2: Methodology

### Data Search

- 2.1. The aim of the data search is to collate existing ecological records for the Site and the surrounding area. Obtaining existing records is an important part of the assessment process as it provides information on issues that may not be apparent during a single survey, which provides only a 'snapshot' of the ecology of a given site.
- 2.2. Biological records of protected or notable species and non-statutory designated sites were purchased from Greenspace information for Greater London (GiGL) within a 1km radius of the Site boundary which is considered an appropriate radius within central London. Records were provided with location records of varying degrees of accuracy (100m<sup>2</sup>, 1km<sup>2</sup> and 10km<sup>2</sup> respectively) therefore only records of 100m<sup>2</sup> accuracy are included in this assessment. Records of 1km<sup>2</sup> and 10km<sup>2</sup> accuracy may lie outside of the 1km search area and are therefore discounted. Only records returned from the last 10 years are considered relevant for the purposes of this assessment.
- 2.3. In addition, the following online resources were reviewed to supplement the TVERC data:
  - The Multi-Agency Geographic Information for the Countryside (DEFRA 2020) website was accessed for information on the location of statutory designated nature conservation sites within a 10km radius for European designated sites and a 1km search radius for nationally designated sites. Information regarding European Protected Species licence applications within 1km of the Site was also reviewed;
  - Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 for habitats and species of principle importance in England, subject to conservation action, to assist with the evaluation of ecological resources;
  - Southwark Council Local Plan which is currently made of the Saved Southwark Plan (2007) and the Core Strategy (2011) (REF). It is understood that this will be superseded by New Southwark Plan (2020) once it is finalised and adopted.; and
  - The Southwark Biodiversity Action Plan (BAP) known as The Southwark Nature Action Plan (SNAP) 2020.

### Extended Phase 1 Habitat Survey and Protected Species Assessment

- 2.4. An 'extended' Phase I habitat survey was undertaken on 5th November 2020 by Amber Perrett, an experienced senior ecologist and associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM). The weather conditions for the survey were sunny and dry with a temperature of 6°C.
- 2.5. The technique was based on best practice Phase I survey methodology (JNCC, 2010). Note was taken of the more conspicuous fauna and an assessment was made based on any evidence of, or the potential for, the presence of protected and notable flora and fauna. A basic inventory of the habitats and a representative plant species list was produced. Where access allowed, habitats adjacent to the Site and within the wider Masterplan Site area were also considered to provide background context.
- 2.6. The assessment of habitat suitability for protected and notable fauna was based on professional experience and judgement and supplemented by best practice guidance on habitat suitability assessment for key faunal groups including: birds (Gilbert et al., 1998 and Bibby et al., 2000), great crested newt (Gent and Gibson, 2003 and Oldham et al. 2000); reptiles (Froglife, 1999 and Gent and Gibson, 2003); bats (Collins, 2016 and Mitchell-Jones, 2004); badger (Harris et al., 1991 and

Roper, 2010); hazel dormouse (English Nature, 2006); otter (Chanin, 2003); water vole (Dean et al., 2016) and invertebrates (Drake et al., 2007 and Kirby, P,2001).

- 2.7. Invasive species were recorded, where visible including those listed under Schedule 9 of the Wildlife and Countryside Act (WCA) 1981 and plants listed on the London Invasive Species initiative (LISI). It is an offence to plant or otherwise cause to grow in the wild any plant which is included in Part II of Schedule 9 of the WCA 1981.

## Preliminary Bat Roost Assessment

- 2.8. A preliminary bat roost assessment (PBRA) of the trees and structures present within the Site was completed to assess their potential to support roosting bats. The PBRA was undertaken alongside the extended Phase 1 habitat survey on 05th November 2020 and followed standard methodologies for PBRA (Mitchell-Jones, A.J., 2004; Mitchell-Jones, A.J. and McLeish, A.P., 2004; Collins, 2016) as summarised below.
- 2.9. The PBRA for structures comprised an external, and where possible, an internal inspection of all buildings present on- Site to assess their potential to support roosting bats. In summary, this entailed the following:
- A ground level visual inspection of the exterior of the structures within the Site, examining features such as brickwork, cladding, and roofs for evidence of, or potential use by, bats including the presence of bat droppings, feeding remains, staining from fur-oil or urine, or even bats themselves; and
  - Consideration of a number of factors including the presence or absence of features suitable for use by crevice dwelling bats, proximity to foraging habitats or cover, and potential for disturbance from lighting and other sources.
- 2.10. The PBRA of trees comprised a ground level inspection of all trees within the Site to determine the respective suitability of each tree for roosting bats. Potential Roost Features (PRFs) that may be used by bats, as defined within the Bat Conservation Trust (BCT) best practice guidelines (Collins, 2016), were sought. Types of PRF may include the following:
- Woodpecker holes, rot holes, knot holes arising from naturally shed branches and man-made holes;
  - Hazard beams and other vertical or horizontal cracks and splits (such as frost-cracks) in stems or branches;
  - Partially detached platey bark;
  - Cankers;
  - Other hollows or cavities, including butt-rots;
  - Partially detached ivy with stem diameters in excess of 50mm; and
  - Bird, bat or dormouse boxes.
- 2.11. Evidence of the presence of bat roosts was also sought where PRFs were present. These signs include:
- Bat droppings in, around or below a PRF;
  - Odour emanating from a PRF; and
  - Visible staining below a PRF.
- 2.12. The potential of each structure or tree within the Site to support roosting bats was then categorised against the criteria described in **Table 2.1** below.

**Table 2.1: Roost assessment criteria (adapted from BCT guidelines, Collins 2016)**

Suitability	Description of Roosting Habitats
<b>Negligible</b>	Negligible habitat features likely to be used by roosting bats.
<b>Low</b>	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation).  A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.
<b>Moderate</b>	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
<b>High</b>	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection conditions and surrounding habitat.

## Evaluation

- 2.13. The evaluation of habitats and species is defined in accordance with published guidance (CIEEM, 2019). The level of importance of specific ecological features is assigned using a geographic frame of reference, with international being most important, then national, regional, county, borough, local and lastly, within the boundaries of the Site only.
- 2.14. Evaluation is based on various characteristics that can be used to identify ecological features likely to be important in terms of biodiversity. These include site designations (such as Sites of Species Scientific Interest (SSSIs), or for undesignated features, the size, conservation status (locally, nationally or internationally), and the quality of the ecological feature. In terms of the latter, quality can refer to habitats (for instance if they are particularly diverse, or a good example of a specific habitat type), other features (such as wildlife corridors or mosaics of habitats) or species populations or assemblages.

## Relevant Legislation and Policy

- 2.15. The appraisal has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in England. The context and applicability of each item is explained as appropriate in the relevant sections of the report and additional details are presented in **Appendix 2**.
- The Conservation of Habitats and Species Regulations 2018 (Habitats Regulations);
  - The Wildlife and Countryside Act 1981 (as amended) (WCA);
  - Countryside Rights of Way Act 2000;
  - The Natural Environment and Rural Communities (NERC) Act 2006;
  - The Protection of Badgers Act 1992;
  - The Hedgerow Regulations 1997;
  - The Wild Mammals (Protection) Act 1996;
  - The UK Post-2010 Biodiversity Framework (2011-2020) (Joint Nature Conservation Committee and DEFRA, 2012);

- Biodiversity 2020: A strategy for England's wildlife and ecosystem services (DEFRA, 2011);
- UK Biodiversity Action Plan (UKBAP);
- The National Planning Policy Framework (NPPF) 2019; and
- The London Plan 2016: The Spatial Development Strategy for London,
- Southwark Local plan (made of the saved Southwark Plan, 2007 and Core Strategy, 2011).

## **Limitations**

- 2.16. Owing to the timing of the Phase 1 habitat survey, some plant species may not have been visible. This may have a minor impact on the classification of habitat areas at the Site. However, given the urban nature of the Site and the types of habitats present, this limitation is not considered likely to affect the conclusions of this report.
- 2.17. The Site was accessible and was thoroughly inspected (shown in Figure 1 and Plan 13526/P01). It was not possible to access the entirety of the wider Masterplan Site due to multiple plots being active construction areas. However, the majority of the Masterplan Site was accessible, and this limitation is not considered likely to affect the conclusions of this report.

## **Quality Control**

- 2.18. All ecologists at Tyler Grange Group Ltd are members of CIEEM and abide by the Institute's Code of Professional Conduct.

## Section 3: Ecological Features and Evaluation

### Desk Study

#### *Statutory Designated Sites: European Designated Sites*

- 3.1. Two European designated sites were identified within the 10km search area, both sharing the same boundary and located approximately 9.3km north of the Site: The Lee Valley Special Protection Area (SPA) and Ramsar site.
- 3.2. The Lee Valley SPA qualifies under Article 4.1 of the Birds Directive 2009/147/EC for over-wintering populations of Eurasian bittern *Botaurus stellaris* and Article 4.2 over-wintering populations of northern shoveler *Anas clypeata* and gadwall *Anas strepera*. This site is considered to be of **international importance**.
- 3.3. The Lee Valley Ramsar site is qualifies under Ramsar Criterion 2 for supporting the plant species whorled water-milfoil *Myriophyllum verticillatum* and a waterboatman, *Micronecta minutissima*. The Ramsar site also qualifies under Ramsar criterion 6 for over-wintering populations of gadwall and northern shoveler. This site is considered to be of **international importance**.

#### *Statutory Designated Sites: Nationally Designated Sites*

- 3.4. No nationally designated sites were identified within the search area.

#### *Non-statutory Designated Sites*

- 3.5. In London, non-statutory sites designated for their biodiversity importance are known as Sites of Importance for Nature Conservation (SINCS). SINCS are recognised by the Greater London Authority and London Borough Councils as important wildlife sites. SINCS are broken down into three tiers dependent on the geographic scale at which they are of importance, and these are, from most to least important:
  - Sites of Metropolitan Importance;
  - Sites of Borough Importance (borough grade I and borough grade II); and
  - Sites of Local Importance
- 3.6. Twelve SINCS were identified within the 1km search area are shown in **Table 3.1** below.

**Table 3.1: Non-statutory designated sites within the search area**

Site name	Designation	Approximate distance and direction from the Site	Site description
<b>Victory Park and Elba Place Nature Garden</b>	Local	0.2km east of the Site	A community park with hedges, climbing plants and grassland with small areas of scrub and young woodland.
<b>Dickens Square Park (Rockingham Park)</b>	Local	0.4km north of the Site	Small park containing woodland, grassland with 11 bird species recorded.

Site name	Designation	Approximate distance and direction from the Site	Site description
<b>Geraldine Mary Harmsworth Park</b>	Local	0.5km north east of the Site	A park containing amenity grassland and scattered trees with recent planting of native tree species.
<b>Surrey Gardens</b>	Local	0.6km south west of the Site	A small park containing amenity grassland, scattered trees, woodland, and semi-improved neutral grassland.
<b>Walworth Garden Farm</b>	Borough Grade II	0.6km south west of the Site	A horticultural city farm with a nature area at one edge of the farm containing a small pond, surrounded by vegetation and a few trees and shrubs.
<b>Surrey Square Park</b>	Local	0.7km south east of the Site	A small park containing an area of grassland and a chalk bank, surrounded by scrub.
<b>Tabard Gardens</b>	Local	0.8km north east of the Site	A small park containing amenity grassland, scattered trees and scrub.
<b>Kennington Park</b>	Local	0.9km south west of the Site	A Victorian park, with a collection of mature trees and a 'flower garden' with a range of species.
<b>Lambeth Walk Doorstep Green</b>	Local	0.9km west of the Site	Most of the site consists of amenity grassland with small areas which have been sown with wildflower mixes.
<b>Leathermarket Gardens &amp; Community Park</b>	Local	0.9km north east of the Site	A small park with formal gardens and mature trees. A recently created community park contains many young trees and shrubs.
<b>Roots and shoots nature garden</b>	Borough Grade I	0.9km west of the Site	Habitats include a small area of hazel <i>Corylus avellana</i> coppice, grassland, areas of tall herbaceous species, young trees and shrubs, climbing plants, and a pond.
<b>Burgess Park</b>	Borough Grade II	1km south of the Site	Habitats include a lake containing a diverse fish population. The north

Site name	Designation	Approximate distance and direction from the Site	Site description
			bank supports reeds and other emergent vegetation, with trees, providing cover for nesting waterfowl.

## Habitats and Flora

- 3.7. Three records of notable plant species were returned within the search area: long-stalked crane's bill *Geranium columbinum*, dittander *Lepidum latifolium* and large-leaved lime *Tilia platyphyllos*. The closest of these records was large-leaved lime, at approximately 0.26km north west of the Site. None of these species were recorded within the Site during the extended Phase 1 Habitat survey.
- 3.8. The Site is located within an urban setting and is primarily composed of hardstanding and bare ground. The majority of the Site was not publicly accessible and was surrounded by wooden fencing, with the southern portion of the Site used as a public walkway with improved grassland and introduced shrub present. Habitats identified within the Site during the Phase 1 habitat survey area detailed in **Table 3.2** below and are shown on plan 13526/P01.
- 3.9. The wider Masterplan Site is primarily formed of areas of hardstanding and several multi-storey residential and commercial buildings, with associated ornamental planting. A park area is present in the approximate centre which is partly under construction and is comprised of amenity grassland, introduced shrub and mature trees. Numerous scattered trees are located within the area.

**Table 3.2: Phase 1 habitats present within the Site**

Phase 1 Habitat type and code	Habitat description	Ecological importance	Photograph of habitat type
<b>A2.2 Scrub - scattered</b>	A small area of scattered scrub was present with small areas of bare ground. The scrub was dominated by bramble <i>Rubus fruticosus</i> with occasional <i>Buddleja davidii</i> .	Scrub is common in the wider landscape but does represent one of the more valuable habitats at the Site relative to others present. As such, the scrub is considered to be of <b>site ecological importance</b> .	
<b>A3.1 Scattered broadleaved trees</b>	Two trees were present within the enclosed area of the Site (indicated by the fence shown in plan 13526), with an additional five trees present in the southern, publicly accessible portion of the Site. Species were predominately: London plane <i>Platanus x acerifolia</i> and sycamore <i>Acer pseudoplatanus</i> .	Broadleaved trees are prevalent throughout the wider Masterplan Site area and the surrounding landscape but do offer value to the ecological resource at the Site. As such, the trees are considered to be of <b>site ecological importance</b> .	

Phase 1 Habitat type and code	Habitat description	Ecological importance	Photograph of habitat type
<b>C3.1 Other tall herb and fen - ruderal</b>	Small areas of tall ruderal vegetation were present within the enclosed area of the Site, between patches of bare ground. Dominant species were: common nettle <i>Urtica dioica</i> and Canadian fleabane <i>Erigeron canadensis</i> .	The tall ruderal vegetation is considered to be of little ecological value and so is of <b>negligible ecological importance</b> .	
<b>B4 Improved grassland</b>	Small areas of improved grassland were present in the southern, publicly accessible portion of the Site. Species included perennial ryegrass <i>Lolium perenne</i> , common daisy <i>Bellis perennis</i> , and common dandelion <i>Taraxacum officinale</i> .	The improved grassland habitat is considered to be of little ecological value and so is of <b>negligible ecological importance</b> .	
<b>J1.4 Introduced shrub</b>	Areas of planted ornamental shrub of various species are present within the publicly accessible southern portion of the Site.	The areas of introduced shrub are considered to be of little ecological value and so is of <b>negligible ecological importance</b> .	

Phase 1 Habitat type and code	Habitat description	Ecological importance	Photograph of habitat type
<b>J3.6 Buildings</b>	Nine buildings were present within the Site, formed predominately of temporary metal-walled structures.	The buildings are of no inherent ecological value and so are considered to be of <b>negligible ecological importance</b>	
<b>J4 Bare ground</b>	Large areas of bare ground are present within the Site, comprised of gravel and sandy soils.	Bare ground is of no inherent ecological value and so is of <b>negligible ecological importance.</b>	
<b>(no code) Hardstanding</b>	A significant portion of the Site is formed of hardstanding.	Hardstanding is of no inherent ecological value and so is of <b>negligible ecological importance.</b>	

## Protected and Priority Fauna

- 3.10. Habitats within the Site may offer opportunities for the following species groups. Species which are considered likely absent from the Site and for which no records were returned from the data search, are not discussed.

### Bats

- 3.11. The following bat species records were returned from the data search: *Nyctalus* bat species, Leisler's bat *Nyctalus leisleri*, noctule *Nyctalus noctula*, pipistrelle species *Pipistrellus* sp., Nathusius' pipistrelle *Pipistrellus nathusii*, soprano pipistrelle *Pipistrellus pygmaeus*, common pipistrelle *Pipistrellus pipistrellus* and unidentified bat species. The closest records were of common pipistrelle and noctule, located approximately 0.37km east of the Site.
- 3.12. Greengage Environmental Ltd monitoring survey reports (2016-2019) in relation to bats recorded at relatively low numbers, with the majority of passes attributed to common pipistrelles. A total of six species have been confirmed as present across the Masterplan Site. The Greengage Environmental Ltd ES report concluded that a local permanent positive impact of minor significance was anticipated for bat species.
- 3.13. Trees and scrub may be utilised by foraging bats. However, these habitat types occupy only small areas within the Site and are subject to significant light and noise disturbance, likely to discourage bat activity. Bat roost potential of trees and structures is discussed further in Section 4 below.

### Birds

- 3.14. Records of 12 species were returned in the search area: black redstart *Phoenicurus ochruros*, meadow pipit *Anthus pratensis*, herring gull *Larus argentatus*, lesser black-backed gull *Larus fuscus*, grey wagtail *Motacilla cinerea*, dunnock *Prunella modularis*, goldcrest *Regulus regulus*, kestrel *Falco tinnunculus*, peregrine falcon *Falco peregrinus*, swift *Apus apus*, woodcock *Scolopax rusticola*, and fieldfare *Turdus pilaris*. The closest records to the Site were of meadow pipit, dunnock and grey wagtail, at approximately 0.92km north west of the Site.
- 3.15. Greengage Environmental Ltd monitoring survey reports (2016-2019) in relation to birds within the developed areas of the Masterplan Site recorded generally low levels of bird activity. A total of 20 species were recorded including house sparrow *Passer domesticus*, starling *Sturnus vulgaris*, song thrush *Turdus philomelos* and sparrowhawk *Accipiter nisus*. The Greengage Environmental Ltd ES report concluded that a local permanent positive impact of minor significance was anticipated for bird species.
- 3.16. One wren *Troglodytes troglodytes* and one dunnock were observed foraging in the scattered scrub within the Site during the survey. Dunnock is Amber listed under the Birds of Conservation Concern 4: The Red List for Birds (Eaton *et al.* 2015) and is listed as a priority species in the Southwark BAP.
- 3.17. Trees and the small area of scrub offer foraging and nesting opportunities for birds. Disused bird nests were observed within one London plane tree within the Site (T4 on plan 13526/P01) and in several other trees in the wider area, indicating that some bird species nest in the area and are likely to be habituated to high levels of noise disturbance. No optimal habitat for breeding birds listed on Schedule 1 of the WCA 1981 (as amended) such as peregrine falcon and black redstart, was observed within the Site.

### *Invertebrates*

- 3.18. Records of three invertebrate species were returned from the data search: stag beetle *Lucanus cervus*, Jersey tiger moth and *Volucella zonaria*, a fly species. The closest of these records was of a Jersey tiger moth, located approximately 65km east of the Site.
- 3.19. Greengage Environmental Ltd monitoring survey reports (2016-2019) in relation to invertebrates recorded over 200 species utilising green roofs within the Masterplan Site. The Greengage Environmental Ltd ES report concluded that a local permanent positive impact of minor significance was anticipated for bird species.
- 3.20. Several log piles were present within the Site, which were tightly bundled and raised on wooden pallets (see Target note 1, Plan 13526/P01) and could offer limited suitable habitat for some invertebrate species. Other habitats present within the Site are likely to support low numbers of common and widespread invertebrate species only.

### *Other Notable Species*

- 3.21. There is no suitable habitat for great crested newt *Triturus cristatus* or other aquatic species, badger *Meles meles* or reptiles and no records were returned of these species. As such, these species are considered likely to be absent from the Site and are not discussed further within this report.
- 3.22. Four records of West European hedgehog *Erinaceus europaeus* were returned, located approximately 0.35km east of the Site. Habitats within the Site offer limited suitability for hedgehog. However, access to the Site is limited, with wooden boarding surrounding the majority of the Site and with limited connectivity to other areas of suitable habitat. Hedgehogs are therefore considered likely absent from the Site.

### **Invasive Species**

- 3.23. One LISI species was identified within the Site, *Buddleja davidii*. This species is an invasive non-native.
- 3.24. No other invasive plant species were observed within the Site during the extended Phase 1 habitat survey and the closest records of invasive plant species were the LISI listed *Buddleja davidii*, cotoneaster *Cotoneaster* sp., Goat's-rue *Galega officinalis*, green alkanet *Pentaglottis sempervirens* and False-acacia *Robinia pseudoacacia*, all located approximately 0.1km east of the Site. There is, therefore, potential for further invasive species to colonise the Site.

## Section 4: Preliminary Bat Roost Assessment Results

- 4.1 The Greengate Environmental Ltd August 2020 ES report did not identify roosting bats within the Masterplan Site. However, it acknowledges that the survey methodology employed by Greengate Environmental Ltd would be unlikely to identify roosting bats, and focussed primarily on bat activity, as discussed in paragraph 2.3 above.
- 4.2 Seven trees and nine structures were located within the Site boundary and were subject to PBRA, as shown on the Habitat Features and PBRA plan (13526/P01). None of the trees or structures assessed appeared to contain any features suitable for roosting bats. The results of the assessment are shown below in **Table 4.1** and **Table 4.2** below.

**Table 4.1: PBRA results - trees**

Tree number	Tree species common name	Approximate OS grid reference	Potential roost features description (if present)	Suitability	Photograph
T1	Sycamore	TQ 32098 78823	None visible	Negligible	

Tree number	Tree species common name	Approximate OS grid reference	Potential roost features description (if present)	Suitability	Photograph
T2	Unknown species	TQ 32093 78828	None visible	Negligible	
T3	London plane	TQ 32100 78819	None visible	Negligible	

Tree number	Tree species common name	Approximate OS grid reference	Potential roost features description (if present)	Suitability	Photograph
T4	London Plane	TQ 32101 78816	None visible	Negligible	
T5	Sycamore	TQ 32102 78813	None visible	Negligible	

Tree number	Tree species common name	Approximate OS grid reference	Potential roost features description (if present)	Suitability	Photograph
T6	London plane	TQ 32104 78810	None visible	Negligible	
T7	London plane	TQ 32108 78802	None visible	Negligible	

**Table 4.2: PBRA results - structures**

Structure number	Structure description	Approximate OS Grid reference	Potential roost features description (if present)	Suitability	Photograph
S1	Large temporary office structure. Single layered walls with flat roof.	TQ 32159 78857	None visible	Negligible	
S2	Small temporary container structure with corrugated metal single layered walls with flat roof.	TQ 32137 78843	None visible	Negligible	
S3	Small temporary container structure with corrugated metal single layered walls with flat roof.	TQ 32132 78851	None visible	Negligible	

Structure number	Structure description	Approximate OS Grid reference	Potential roost features description (if present)	Suitability	Photograph
S4	Brick-built structure of unknown type, a portion of a demolished structure. Internal void open and exposed with no PRFs visible.	TQ 32130 78848	None visible	Negligible	
S5	Disused building of wooden boarding construction with a flat roof.	TQ 32114 78854	None visible	Negligible	
S6	Small temporary container structure with corrugated metal single layered walls with flat roof.	TQ 32111 78877	None visible	Negligible	

Structure number	Structure description	Approximate OS Grid reference	Potential roost features description (if present)	Suitability	Photograph
S7	Small unit structure with open glass window.	TQ 32106 78885	None visible	Negligible	
S8	Small temporary container structure with corrugated metal single layered walls with flat roof.	TQ 32098 78860	None visible	Negligible	
S9	Small temporary container structure with corrugated metal single layered walls with flat roof.	TQ 32182 78854	None visible	Negligible	

## Section 5: Discussion and Recommendations

### Potential Impacts and Recommendations

- 5.1 Where there are potential impacts to the ecological features described above during either the construction or operational phases of the development they are described below. Where impacts would trigger legislation or planning policy (as set out in **Appendix 2**), the requirement for mitigation is noted.
- 5.2 It is understood that a CEMP will be prepared in due course, outlining best practice principles and construction working methods. It is recommended that measures set out below in relation to nesting bird protection are incorporated into the CEMP as appropriate.

#### *Designated Sites*

- 5.3 All statutory sites are considered to be sufficiently distant from the Site that the Works will result in no negative impacts upon them. It is considered that any minor increase in pollution, noise and light levels that occur due to the Works will be localised and minor in the existing urban context of the wider London area. Furthermore, no habitat types similar to those within statutory designated sites are present within the Site and there is no habitat connectivity between the Site and statutory designated sites.
- 5.4 The Site is not subject to a conservation designation and it is considered that no non-statutory sites are likely to be affected by the Works due to their distance from the Site and existing urban context. Therefore, no impacts on designated sites are anticipated as a result of the Works.

#### *Bats*

- 5.5 All trees and structures present within the Site at the time of survey were subject to PBRA and all were found to be of negligible suitability for roosting bats. Habitats within the Site offer limited potential for bat foraging and are subject to significant noise and light disturbance. It is therefore considered that no significant impacts will occur on bat populations as a result of the Works.
- 5.6 It is possible to enhance the Site for bats through retainment of existing trees, planting of native species and incorporation of bat boxes into the design where possible.

#### *Birds*

- 5.7 Trees and scrub within the Site offer small areas of suitable habitat which birds may utilise for foraging, roosting and nesting. The habitats within the Site are likely to be utilised by common and widespread bird species.
- 5.8 All breeding birds, their nests, eggs and young are protected under the WCA Act 1981 (as amended), which makes it illegal to knowingly damage or destroy the nest site while it is in use or being built. It is therefore recommended that any required vegetation clearance works are completed outside of the breeding bird season (March-August inclusive). Where this is not possible, a pre-clearance nesting bird check should be completed by a suitably experienced ecologist. If nesting birds are found to be present, a buffer zone will be instated, and no works should be undertaken within the

buffer zone until the chicks have fledged. A repeat visit by the ecologist will be required to determine if the chicks have fledged.

- 5.9 Providing the above measures to avoid harm and disturbance to nesting birds are followed, it is considered that no significant impacts will occur on bird populations as a result of the Works.
- 5.10 Bird boxes can be incorporated into the scheme designs, such as swift boxes, where possible, to represent an enhancement to the resource at the Site for birds. Trees should be retained where possible and new planting incorporating native species could also provide benefits for birds.

#### *Invertebrates*

- 5.11 Habitats within the Site offer limited potential for invertebrates and it is therefore considered that no significant impacts will occur on invertebrate populations as a result of the Works.
- 5.12 While the Site is currently unlikely to support protected or notable species, deadwood habitats are beneficial for a range of invertebrates. In order to provide enhancements for invertebrates, it is recommended that the log piles currently stored within the Site (TN1) are placed on the ground within suitable areas, such in undisturbed and vegetated areas of the central park area, which lies adjacent to the Site.

#### *Invasive Species*

- 5.13 The *Buddleja davidii* located within the Site is listed on the London Invasive Species Initiative (LISI) should be carefully and wholly removed from Site as part of the works.

## Section 6: Conclusions

- 6.1. The Site is considered to be sufficiently distant from both Statutory and non-statutory designated sites that no impacts on designated sites are anticipated.
- 6.2. Habitats present within the Site are of limited ecological value, predominately formed of hardstanding and bare ground. Habitats present within the site are common and widespread within the wider area and no significant impact is anticipated on these habitats as a result of the Works.
- 6.3. The Site holds limited potential to support protected and notable species. Recommendations are made to avoid impacts on nesting birds (Paragraph 2.19), which are protected under the WCA 1981 (as amended). Providing these recommendations are followed, a negligible impact on ecological receptors is anticipated as a result of the Works.
- 6.4. Opportunities for enhancement are present by retaining log piles and existing trees where possible, planting native species, incorporating bird or bat boxes into building design and removing *Buddleja davidii* from the Site. Such enhancements align with the targets of the Southwark Local plan which aims to increase trees and vegetated areas while improving the quality of open spaces and may benefit species listed on the Southwark BAP. The CEMP to be prepared should incorporate the above recommendations, detail any proposed enhancements and should be adhered to throughout the construction phase.

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## Appendix 2: Planning & Legislative Context

### Legislation

- A2.1. Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:
- The Wildlife and Countryside Act (WCA) 1981 (as amended);
  - The Conservation of Habitats and Species Regulations 2018;
  - The Countryside and Rights of Way (CRoW) Act 2000;
  - The Natural Environment and Rural Communities Act (NERC) 2006;
  - The Hedgerows Regulations 1997; and
  - The Protection of Badgers Act 1992.
- A2.2. The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The Birds Directive (formally known as Council Directive 2009/147/EC on the conservation of wild birds) was also adopted in 2009. These directives have been transposed into UK law through The Conservation of Habitats and Species Regulations 2017 (as amended).
- A2.3. In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.
- A2.4. The CRoW Act 2000 strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.

### National Planning Policy

#### *National Planning Policy Framework (NPPF), February 2019*

- A2.5. The National Planning Policy Framework (NPPF) was published in February 2019 and sets out the Government's planning policies for England and how these should be applied. It replaces the first National Planning Policy Framework published in March 2012.
- A2.6. Paragraph 11 states that:  
*"Plans and decisions should apply a presumption in favour of sustainable development."*
- A2.7. Section 15 of the NPPF (paragraphs 170 to 177) considers the conservation and enhancement of the natural environment.

A2.8. Paragraph 170 states that planning and decisions should contribute to and enhance the natural and local environment by:

- a) *“protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and*
- c) *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”.*

A2.9. Paragraph 171 states that plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

A2.10. Paragraph 174 states that in order to protect and enhance biodiversity and geodiversity, plans should:

- a) *“Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b) *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

A2.11. When determining planning applications, Paragraph 175 states that local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- a) “if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons<sup>58</sup> and a suitable compensation strategy exists; and
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.”

A2.12. As stated in paragraph 176 the following should be given the same protection as habitats sites:

- a) *“potential Special Protection Areas and possible Special Areas of Conservation;*
- 
- b) *listed or proposed Ramsar sites; and*
- 
- c) *sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.”*

A2.13. Paragraph 177 states that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.

## **Local Planning Policy**

### *London Plan*

A2.14. The London Plan 2016: The Spatial Development Strategy for London, consolidated since 2011 forms the current local plan. Relevant policies relating to ecology and nature conservation are set out below.

A2.15. Policy 5.10 ‘Urban Greening’ states:

#### *“Strategic*

*The Mayor will promote and support urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change.*

*The Mayor seeks to increase the amount of surface area greened in the Central Activities Zone by at least five per cent by 2030, and a further five per cent by 2050[1].*

#### *Planning decisions*

*Development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping. Major development proposals within the Central Activities Zone should demonstrate how green infrastructure has been incorporated.*

*Local Development Framework (LDF) preparation*

*Boroughs should identify areas where urban greening and green infrastructure can make a particular contribution to mitigating the effects of climate change, such as the urban heat island.”*

A2.16. Policy 5.11 ‘Green roofs and development site environs’ states:

*“Planning decisions*

*Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible, to deliver as many of the following objectives as possible:*

- *adaptation to climate change (i.e. aiding cooling);*
- *sustainable urban drainage;*
- *mitigation of climate change (i.e. aiding energy efficiency);*
- *enhancement of biodiversity;*
- *accessible roof space;*
- *improvements to appearance and resilience of the building; and*
- *growing food.*

*LDF preparation*

*Within LDFs boroughs may wish to develop more detailed policies and proposals to support the development of green roofs and the greening of development sites. Boroughs should also promote the use of green roofs in smaller developments, renovations and extensions where feasible.“*

A2.17. Policy 5.3 ‘Sustainable design and construction’ states:

*“Strategic*

*The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.*

*Planning decisions*

*Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.*

*Major development proposals should meet the minimum standards outlined in the Mayor’s supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles:*

- *minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems);*
- *avoiding internal overheating and contributing to the urban heat island effect;*

- *efficient use of natural resources (including water), including making the most of natural systems both within and around buildings;*
- *minimising pollution (including noise, air and urban runoff);*
- *minimising the generation of waste and maximising reuse or recycling*
- *avoiding impacts from natural hazards (including flooding);*
- *ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions;*
- *securing sustainable procurement of materials, using local supplies where feasible; and*
- *promoting and protecting biodiversity and green infrastructure.*

#### *LDF preparation*

*Within LDFs boroughs should consider the need to develop more detailed policies and proposals based on the sustainable design principles outlined above and those which are outlined in the Mayor's supplementary planning guidance that are specific to their local circumstances."*

A2.18. Policy 7.19 'Biodiversity and Access to nature' states:

#### *"Strategic*

*The Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy. This means planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans.*

*Any proposals promoted or brought forward by the London Plan will not adversely affect the integrity of any European site of nature conservation importance (to include special areas of conservation (SACs), special protection areas (SPAs), Ramsar, proposed and candidate sites) either alone or in combination with other plans and projects. Whilst all development proposals must address this policy, it is of particular importance when considering the following policies within the London Plan: 1.1, 2.1-2.17, 3.1, 3.3, 3.7, 5.4A, 5.14, 5.15, 5.17, 5.20, 6.3, 6.9, 7.14, 7.15, 7.25 – 7.27 and 8.1. Whilst all opportunity and intensification areas must address the policy in general, specific locations requiring consideration are referenced in Annex 1.*

#### *Planning decisions*

*Development Proposals should: a wherever possible, make:*

- *positive contribution to the protection, enhancement, creation and management of biodiversity*
- *prioritise assisting in achieving targets in biodiversity action plans (BAPs), set out in Table 7.3, and/or improving access to nature in areas deficient in accessible wildlife sites*
- *not adversely affect the integrity of European sites and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.*

*On Sites of Importance for Nature Conservation development proposals should:*

- *give the highest protection to sites with existing or proposed international designations<sup>1</sup> (SACs, SPAs, Ramsar sites) and national designations<sup>2</sup> (SSSIs, NNRs) in line with the relevant EU and UK guidance and regulations<sup>3</sup>*
- *give strong protection to sites of metropolitan importance for nature conservation (SMIs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance*
- *give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.*
- *When considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest, the following hierarchy will apply:*
  - *avoid adverse impact to the biodiversity interest*
  - *minimize impact and seek mitigation*
  - *only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.*

#### *LDF preparation*

*In their LDFs, Boroughs should:*

- *use the procedures in the Mayor's Biodiversity Strategy to identify and secure the appropriate management of sites of borough and local importance for nature conservation in consultation with the London Wildlife Sites Board.*
- *identify areas deficient in accessible wildlife sites and seek opportunities to address them*
- *include policies and proposals for the protection of protected/ priority species and habitats and the enhancement of their populations and their extent via appropriate BAP targets*
- *ensure sites of European or National Nature Conservation Importance are clearly identified*
- *identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites."*

### **The London Plan, The Spatial Development Strategy for Great London, Draft published in July 2019**

A2.19. The London Local Plan (Intend to Publish) December 2019 has yet to be adopted by London Council, however, as the consultation stage has closed and the inspector's comments have been incorporated, it may be a consideration for future developments. Policies relating to ecology and nature conservation can be found in Chapter 8: Green Infrastructure and Natural Environment, which are summarised as follows:

#### *Policy G1 Green infrastructure*

- A2.20. London's network of green and open spaces, and green features in the built environment should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.
- A2.21. Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A.

- A2.22. Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:
- identify key green infrastructure assets, their function and their potential function; and
  - identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
  - Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

*Policy G5 Urban Greening*

- A2.23. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage;
- A2.24. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses); and

*Policy G6 Biodiversity and access to nature*

- A2.25. Sites of Importance for Nature Conservation (SINCs) should be protected.
- A2.26. Boroughs, in developing Development Plans, should:
- use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
  - identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
  - support the protection and conservation of priority species and habitats that sit outside of the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
  - seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
  - ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.
  - Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
    - avoid damaging the significant ecological features of the site
    - minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
  - deliver off-site compensation of better biodiversity value.
- A2.27. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

A2.28. Proposals which reduce deficiencies in access to nature should be considered positively.

*Policy G7 Trees and woodlands*

A2.29. London urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest –the area of London under the canopy of trees.

A2.30. In their Development Plans, boroughs should:

- protect 'veteran' trees and ancient woodland where these are not already part of a protected site
- identify opportunities for tree planting in strategic locations.
- Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments –particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

### **Southwark Local Plan**

A2.31. Southwark Local plan is currently made of the Saved Southwark Plan (2007) and Core Strategy (2011). These plans are going to be superseded by New Southwark Plan (2020) which has not yet been finalised or adopted.

A2.32. The saved Southwark Plan states under Policy 3.28 Biodiversity: *“The LPA will take biodiversity into account in its determination of all planning applications and will encourage the inclusion in developments of features which enhance biodiversity, requiring an ecological assessment where relevant. Developments will not be permitted which would damage the nature conservation value of Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves (LNRs) and/or damage habitats, populations of protected species or priority habitats/species identified in the United Kingdom, London or the Southwark Biodiversity Action Plan. Where, exceptionally, such developments are permitted, the Council will seek mitigation and/or compensation for the damage to biodiversity.”*

A2.33. The Southwark Core Strategy 2011 states under Strategic Objective 2F: *“Open spaces and biodiversity will be protected, made more accessible and improved.”* It also sets out the following targets under Strategic Policy 11:

- Improve quality of open spaces;
- Increase in trees, woodlands and vegetated areas;
- No loss or damage to SINCs;
- Improvement in priority habitats'
- Everyone within walking distance of a quality natural space.

## Southwark Biodiversity Action Plan

A2.34. The Southwark Draft BAP 2020, known as The Southwark Nature Action Plan (SNAP) 2020 has been adopted by cabinet and identifies the following species or species groups as notable in Southwark:

- Bats
- Stag beetle
- Common lizard *Zootoca vivipara*
- Slow-worm *Anguis fragilis*
- West European Hedgehog
- Common frog *Rana temporaria*
- Common toad *Bufo bufo*
- Smooth newt *Lissotriton vulgaris*
- Black poplar *Populus nigra*
- Mistletoe *Viscum album*
- White Letter Hairstreak butterfly *Satyrrium w-album*
- House Sparrow *Passer domesticus*
- Swift
- Peregrine Falcon
- Bumble Bee species
- Corky Fruited Water Dropwort *Oenanthe pimpinelloides*
- Native Bluebell *Hyacinthoides non-scripta*

A2.35. Species action plans are set out within the SNAP 2020 for: hedgehog, stag beetle, amphibians and odonata, bats, birds, native trees and woodland flora, pollinators.

# Appendix 3: Ecology Survey Planner

Birmingham  
t. 0121 773 0770

Cotswolds  
t. 01285 831 804

Exeter  
t. 01392 447 588

Manchester  
t. 0161 236 8367

London  
t. 020 3934 9470

e. [info@tylergrange.co.uk](mailto:info@tylergrange.co.uk)  
w. [tylergrange.co.uk](http://tylergrange.co.uk)

<sup>1</sup> Internal building searches for evidence of bats can be undertaken at any time; winter is the best time for assessing trees for roosting potential, with further work to confirm potential undertaken in spring / summer.

<sup>2</sup> The timing of detailed flora surveys, such as those to inform planning and Biodiversity Net Gain, are dependent on the specific habitat type to be investigated.

<sup>3</sup> Timing is dependent on target species/group.

<sup>4</sup> Surveys are required in both the early and late seasons.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Badgers	Sub-optimal											
Bats activity	Optimal	Optimal	Optimal	Sub-optimal								
Bats <sup>1</sup> roost identification	Sub-optimal											
Birds breeding	Sub-optimal											
Birds winter	Sub-optimal											
Crayfish	Sub-optimal											
Dormouse	Sub-optimal											
Great Crested Newts breeding ponds	Sub-optimal											
Habitats / Detailed Flora <sup>2</sup>	Sub-optimal											
Hedgerows	Sub-optimal											
Otter	Sub-optimal											
Reptiles	Sub-optimal											
Terrestrial / Freshwater Invertebrates <sup>3</sup>	Sub-optimal											
Water Voles <sup>4</sup>	Sub-optimal											

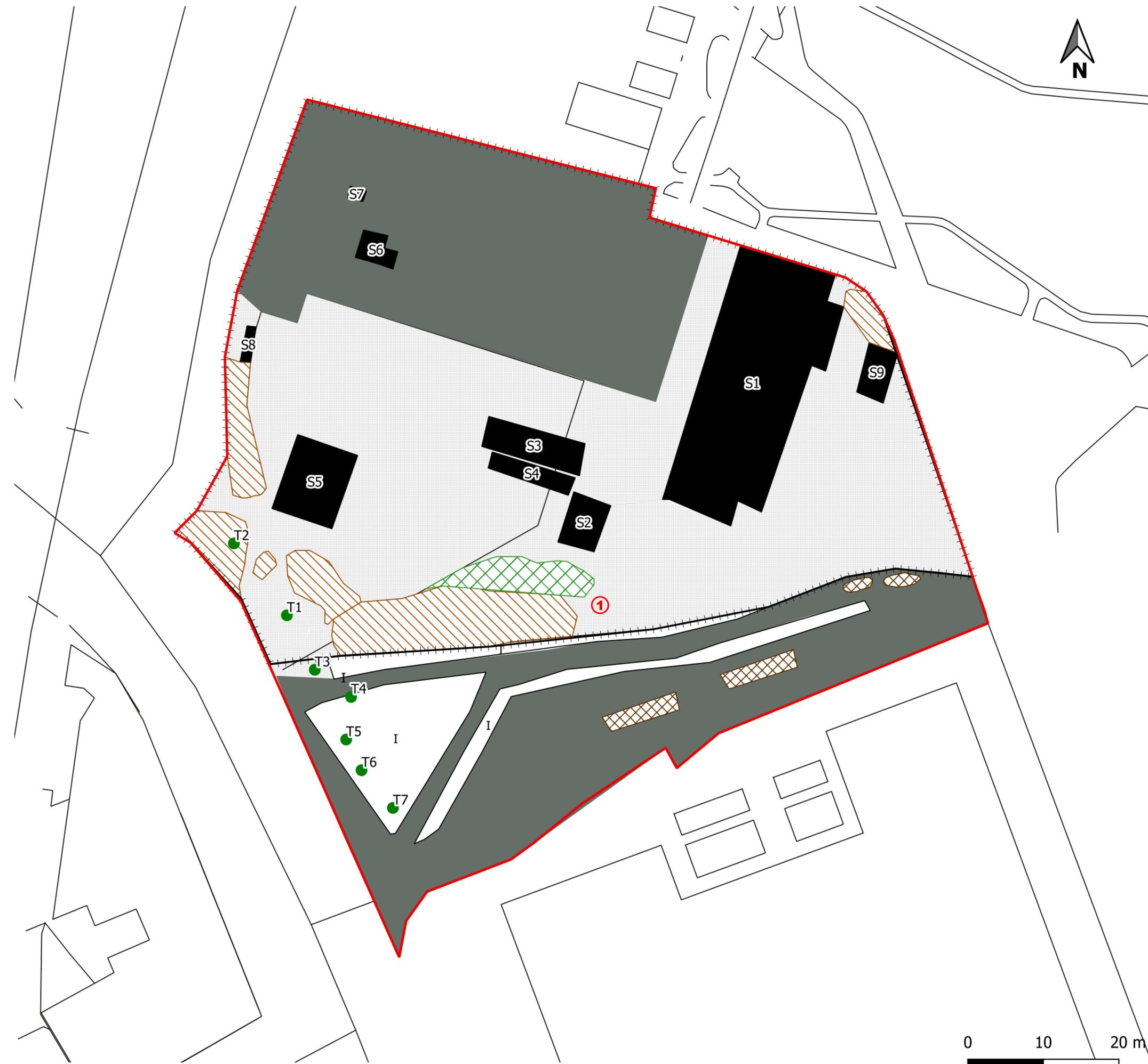
Surveys optimal
  Surveys sub-optimal
  Surveys cannot be undertaken / results unreliable



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# Habitat Features and PBRA Plan 13526/P01



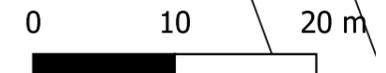


- Site boundary
- Phase 1 habitat types:
- A3.1 Scattered broadleaved trees
- A2.2. Scrub - scattered
- I B4 Improved grassland
- C3.1 Other tall herb and fen - ruderal
- J1.4 Introduced shrub
- J2.4 Fence
- J4 Bare ground
- Structures
- Hardstanding
- ① Target note

Project | Elephant Park  
 Drawing Title | **Habitat Features and Preliminary Bat roost Assessment Plan**  
 Scale | As Shown (Approximate)  
 Drawing No. | 13526/P01  
 Date | 17/11/2020  
 Checked | AP/NJ



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## **Appendix 2.2**

### EIA Scoping Meeting Minutes

# Minutes of Meeting

## 17<sup>th</sup> December 2020

<b>Purpose of Meeting:</b>	To discuss and agree (in principle) the approach to, and content of, the Applicant's 'Environmental Statement (ES) as outlined in the 'Environmental Impact Assessment (EIA) Scoping Report, Elephant Park Plot H1, Elephant and Castle, Southwark' dated 7 <sup>th</sup> December 2020.			
<b>Location of Meeting:</b>	On-line.			
<b>Date of minutes:</b>	5 <sup>th</sup> January 2021.		210105 EP H1 Minutes of Meeting Held 17 <sup>th</sup> December 2020 FINAL (HF - KR)	<b>Meeting No:</b> N/A

<b>Details:</b>			
<b>Attendees present</b>			
Jonathan Pinkney	JP	Lendlease	LL
Angela Brennan	AB	Lendlease	LL
Jonathan Smith	JS	DP9	DP9
David Shiels	DS	DP9	DP9
Hannah Fiszpan	HF	Avison Young	AY
Kirsty Rimondi	KR	Avison Young	AY
Victoria Crosby	VC	London Borough of Southwark	LBS
Jon Grantham	JG	Land Use Consultants	LUC
Sarah Cane-Ritchie	SCR	Land Use Consultants	LUC

<b>Sending apologies</b>			
N/A	N/A	N/A	N/A

<b>Distribution, those above plus</b>

Meeting Minutes

Meeting Reference: 210104 EP H1 Minutes of Meeting  
Held 17th December 2020 DRAFT  
V2 (HF - KR)5<sup>th</sup> January 2021

Meeting Number: N/A

N/A	N/A	N/A	N/A
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Meeting Items		Action
<b>1.0</b>	<b>Introductions</b>	
1.1	Round table introductions were made.	<b>N/A</b>
<b>2.0</b>	<b>Purpose of the Meeting</b>	
2.1	It was confirmed that seeking an EIA Scoping Opinion from a determining authority was not a mandatory requirement of the relevant EIA Regulations, and that the Applicant will not be requesting a formal EIA Scoping Opinion from LBS. However, it was explained that the purpose of the meeting was to gain in principle agreement from LUC (on behalf of LBS) to the EIA strategy and broad scope of the forthcoming ES as set out in the Applicant's 'Environmental Impact Assessment (EIA) Scoping Report, Elephant Park Plot H1, Elephant and Castle, Southwark' dated 7 <sup>th</sup> December 2020 (the 'December 2020 EIA Scoping Report').	<b>N/A</b>
2.2	In view of the above, JG noted concern that statutory consultees will not have an opportunity to provide their view on the content of the December 2020 EIA Scoping Report which could carry risk.	<b>N/A</b>
2.3	HF reiterated that the proposed EIA Strategy and scope of the ES, as outlined in the December 2020 EIA Scoping Report, was informed by substantial expert opinion in the field of urban regeneration EIA and, in particular being cognisant of all EIA work undertaken in respect of the wider Elephant and Castle regeneration of which HF and KR have been involved with since 2011. HF also reiterated that consultation with statutory consultees (as relevant) will occur as part of the overall EIA process which should reduce the risk noted in item 2.2. Where this is the case, this will be noted / explained in the final ES.	<b>N/A</b>
	<b>Post meeting note:</b> The December 2020 EIA Scoping Report has undergone a thorough legal review and health-check with the Applicant's Planning Lawyers (Pinsent Masons (PM)). PM are satisfied with the content of the December 2020 EIA Scoping Report.	
2.4	Although a formal EIA Scoping Opinion will not be sought from LBS, it was agreed minutes of the meeting would be circulated for agreement between all. This process will be described in the ES. The December 2020 EIA Scoping Report and final meeting minutes will be appended to the ES to provide an audit trail in relation to the informal EIA Scoping process between the Applicant and LBS.	<b>AY and all</b>
<b>3.0</b>	<b>Planning Overview</b>	
3.1	JS provided an overview on the status of the currently under determination amendment to the Phasing Plan application (accompanied by a separate ES managed and coordinated by Greengage (the 'September 2020 ES'). This application is related to the entire Elephant Park masterplan and subject to concluding the final discussions in one area should be recommended for approval.	<b>N/A</b>

Meeting Minutes

Meeting Reference: 210104 EP H1 Minutes of Meeting  
Held 17th December 2020 DRAFT  
V2 (HF - KR)5<sup>th</sup> January 2021

Meeting Number: N/A

Meeting Items		Action
3.2	JS provided an overview of the Applicant's forthcoming drop-in detailed planning application for Plot H1 (the subject of the forthcoming ES managed and coordinated by AY). It was noted that this application should be considered as a separate application to the wider approved Elephant Park masterplan, albeit that the drop-in detailed planning application is being worked up to be entirely cognisant and complementary to the wider approved Elephant Park masterplan.	N/A
3.3	HF and KR reiterated that the September 2020 ES together with LUC's independent review of the September 2020 ES was thoroughly reviewed in order to feed into the proposed EIA strategy and scope set out in the December 2020 EIA Scoping Report.	N/A
<b>4.0</b>	<b>Overview of the Proposed EIA Strategy</b>	
4.1	Consistent with the content of the December 2020 EIA Scoping Report, HF provided an overview of the intended EIA strategy (and its rationale) to be applied to the forthcoming ES.	N/A
4.2	Following discussion and debate with all meeting attendees, JG noted that the intended EIA strategy (and its rationale) was considered to be well thought out, consistent with other examples of similar types of projects and acceptable.	N/A
<b>5.0</b>	<b>Broad Scope of the ES</b>	
5.1	KR provided a run through of the proposed broad scope of the ES as set out within the December 2020 EIA Scoping Report. Focus was placed on the topic areas intended to be 'scoped out' of the ES.	N/A
5.2	Following discussion and debate with all meeting attendees, JG noted that the proposed broad scope of the ES as set out within the December 2020 EIA Scoping Report appeared to be acceptable; the rationale for scoping topics out of the ES were noted to be common sense and acceptable.	N/A
5.3	KR noted that at the current time, there is uncertainty on whether the topic of solar glare can robustly be scoped out of the ES. The December 2020 EIA Scoping Report therefore currently includes this topic area within the scope of the forthcoming ES. KR explained that when further detail on façade treatment is made available, it may be possible to justify scoping an assessment of solar glare out of the forthcoming ES. If this is the case, this will be fully explained and justified within the ES. JG confirmed that this is a sensible way to proceed.	HF / KR
5.4	JG noted that care should be taken when undertaking the assessment of above ground heritage assets as part of the proposed townscape, visual and above ground heritage assessment. JG commented that sometimes a 'combined' assessment often 'glosses' over the likely significant effects of a project upon the setting of above ground heritage assets, that said, the assessment within the September 2020 ES was noted to be 'ok'.	N/A

Meeting Minutes

Meeting Reference: 210104 EP H1 Minutes of Meeting Held 17th December 2020 DRAFT V2 (HF - KR)

5<sup>th</sup> January 2021

Meeting Number: N/A

Meeting Items		Action
5.5	HF and KR noted that the proposed townscape, visual and above ground heritage assessment will be undertaken by the same competent expert who undertook the assessment for the September 2020 ES. As such, based on the comments above, and in knowledge of LUC's independent review comments made in respect of the September 2020 ES, there should be no reason why the forthcoming assessment would be lacking. JG did note that he would be happy to liaise with the townscape consultant in the first instance to ensure the assessment is prepared in line with LUC expectations.	
5.6	JG noted that proposed viewpoints for townscape, visual and above ground heritage assessment were included within Appendix II of the December 2020 EIA Scoping Report. However, if a formal EIA Scoping Opinion is not to be obtained, how would these be agreed with relevant statutory consultees? KR and DS noted that dialogue has occurred with LBS Officers regarding the selection of assessment viewpoints. Agreement of LBS to the proposed viewpoints will be confirmed, with consultation appended to the forthcoming ES if necessary.	<b>DS</b>
	<i><b>Post meeting note:</b> The Candidate Views Study setting out the proposed townscape views has since been reissued to LBS for agreement.</i>	
<b>6.0</b>	<b>LBS Comments</b>	
6.1	VC provided a run through of various comments and noted the applicant has chosen not to go through the formal scoping process. It was acknowledged that these comments would not alter the proposed EIA strategy and broad scope of the forthcoming ES as set out in the December 2020 EIA Scoping Report (for example, a graphical error in Figure 5 of the December 2020 EIA Scoping Report, incorrect date quoted for the New Southwark Plan at paragraph 7.9 of the December 2020 EIA Scoping Report, the possibility of a new Conservation Area in proximity to the Site but with no known timescale on the certainty of implementation etc). However, all such observations will be considered (as necessary) in the detailed reporting of the forthcoming ES. VC also noted that the recently expanded new park within Elephant Park may need to be considered in ecology as would not have been in place in November. For daylight and sunlight, given GIA's work on comparing current H1 impacts with approved parameters, VC questioned where that comparison commentary would sit if it is not within the ES.	<b>HF / KR</b>
6.2	VC requested that the forthcoming ES provide a rationale as to why its scope will be different to any previous ES undertaken for the wider Elephant Park masterplan. HF explained that this all forms part of the EIA Scoping process and is already explained and justified within the December 2020 EIA Scoping Report. However, in addition, HF noted that comparisons between the scope of the forthcoming ES and the scope of any previous ES undertaken for the wider Elephant Park masterplan is not necessary to meet the EIA Regulations. The December 2020 EIA Scoping Report and final minutes of the meeting held on 17 <sup>th</sup> December 2020 (these minutes) will be appended to the forthcoming ES to provide a full audit trail and justification of the scope of the forthcoming ES. This can be summarised and referred to in the forthcoming ES, but unnecessary repetition will not be provided. VC queried whether there can there be a simple table that identifies the thread of topics from 2013 to 2020 to now (separate to the formal ES).	<b>HF / KR</b>

Meeting Minutes

Meeting Reference: 210104 EP H1 Minutes of Meeting  
Held 17th December 2020 DRAFT  
V2 (HF - KR)

5<sup>th</sup> January 2021

Meeting Number: N/A

Meeting Items		Action
6.3	VC noted that the location plan only identifies one part of the E&C Shopping Centre Site. VC queried whether it had been implemented, and queried the criteria for including surrounding development. The ES should reflect the latest H1 site condition (inc. urban farm). Will H4 and H5 be completed by the time we submit – JP confirmed that it would likely be completed. That would leave the construction phase overlapping with later plots. Section 6 suggests all OPP mitigation will be in place, however there are current discussions on highway works in particular which suggest this will not be the case.	<b>HF / KR</b>
	<i>Post meeting note: Further comment from VC that section 6.30 says only effects attributable to H1 will be mitigated, however the ES for the revised phasing plan stated that H1 will pick up mitigation for the OPP on wind levels. As one example where the two ESs need to align, and there may be more, to ensure full mitigation across the whole development is included.</i>	
<b>7.0</b>	<b>Any Other Business</b>	
7.1	Not applicable.	

## **Appendix 2.3**

### Consultation to Agree Townscape Assessment Viewpoints

**From:** [Crosby, Victoria](#)  
**To:** [David Shiels](#)  
**Subject:** RE: H1 - Candidate View Point Study  
**Date:** 02 February 2021 16:26:56  
**Attachments:**

---

Hi David,  
Ah yes, you're right, in the DAS will be ok.  
Thanks  
Victoria

---

**From:** David Shiels  
**Sent:** Tuesday, February 02, 2021 10:27 AM  
**To:** Crosby, Victoria  
**Subject:** RE: H1 - Candidate View Point Study

Hi Victoria

Just checking whether the view of the north elevation would be required as a separate townscape render if its already covered off in the DAS? I don't recall discussing its inclusion in the TVIA.

Thanks

David

**David Shiels**

Associate

**DP9 Ltd**

---

**From:** Crosby, Victoria  
**Sent:** 01 February 2021 12:25  
**To:** David Shiels  
**Subject:** RE: H1 - Candidate View Point Study

Hi David,

We didn't have any more suggestions for extra views for the TVIA (with the added view from the north to show the full width that came up in one of the later meetings), and the split of wireline and render seems ok.

Thanks

Victoria

---

**From:** David Shiels  
**Sent:** Thursday, December 17, 2020 12:06 PM  
**To:** Crosby, Victoria  
**Subject:** RE: H1 - Candidate View Point Study

Hi Victoria – as just discussed, I believe the emails below were the last in relation to the

views for H1. As an update, Walcot Square has now been included, and views 27 and 41 have been rendered.

Are there any further comments, or shall we assume this is now agreed?

Thanks

David

**David Shiels**

Senior Planner

---

**From:** David Shiels

**Sent:** 04 March 2020 20:20

**To:** Crosby, Victoria ; [Tsoukaris, Michael](#)

**Cc:** Gambill, Vendela ; Lawless, Ewan

**Subject:** RE: H1 - [Candidate View Point Study](#)

Hi Victoria

Tavernors have advised that they omitted the view from Walcot Square (view 34) because the impact would be negligible to none. They have suggested that it is included as an appendix view.

They also advised that H1 would not be highly visible in views 27 and 41, hence they were included as wirelines, but we can of course render these if required.

Thanks

David

**David Shiels**

Senior Planner

---

**From:** Crosby, Victoria  
**Sent:** 17 February 2020 16:11  
**To:** David Shiels ; [Tsoukaris, Michael](#)

**Cc:** Gambill, Vendela ; [Lawless, Ewan](#)

**Subject:** RE: H1 - Candidate View Point Study

Hi David,

Thanks for the draft study – our two points of feedback are that the view from Walcot Square Conservation Area (in Lambeth) is missing, and secondly that views 27 and 41 should also be rendered (rather than wireline).

Having the VuCity model would be really useful to check whether any further views are needed.

Thanks

Victoria

---

**From:** David Shiels  
**Sent:** Thursday, January 30, 2020 9:57 AM  
**To:** Crosby, Victoria; Tsoukaris, Michael  
**Cc:** Gambill, Vendela; Lawless, Ewan  
**Subject:** RE: H1 - Candidate View Point Study

Hi Victoria/Michael

Please find below a link to the updated CVS.

---

Any issues, please let me know.

Thanks

David

**David Shiels**

Senior Planner

---

**From:** Crosby, Victoria  
**Sent:** 14 January 2020 09:23  
**To:** David Shiels ; [Tsoukaris, Michael](#)

<

**Cc:** Gambill, Vendela ; [Lawless, Ewan](#)

**Subject:** RE: H1 - Candidate View Point Study

Hi David,

Can I check I am reading this correctly. View 5 is the LVMF 23A.1 view location, and the other sequence positions are close to but not the official viewpoint?

We had asked in the meeting for the red box of the protected vista to be added – please can this be done to the formal LVMF point.

cid:image001.png@01D5E72A.1D539FC0



Having the 3D model to put into VuCITY would be really helpful for both these long views and more local views.

Thanks  
Victoria

---

**From:** David Shiels

**Sent:** Wednesday, January 08, 2020 3:46 PM

**To:** Crosby, Victoria; Tsoukaris, Michael

**Subject:** H1 - Candidate View Point Study

Victoria/Michael

In the following [link](#), please find the updated Candidate View Point Study for H1.

This should also address some of your comments from yesterday's meeting regarding the Serpentine viewpoints.

Please let us know your thoughts once you've had a chance to review.

Thanks  
David

**David Shiels**

Senior Planner

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## **Appendix 2.4**

### Updated Detailed Phasing Plan

## Updated OPP Phasing Plan

	Phase					
	Mp1	Mp2	Mp3	Mp4	Mp5a	Mp5b
<b>Plots</b>	H6	H2	H4	H11a	H7	H1
	H10	H3	H5	H11b		
	H12		PAV.1			
	H13					
<b>Park delivery</b>	Temporary Park		Park Phases 1 and 2	Park Phase 3		Park Phase 4
<b>Anticipated construction timescales</b>	Q1 2015 – Q3 2018	Q1 2016 – Q2 2019	Q4 2018 – Q4 2022	Q1 2020 – Q4 2024	Q3 2021 – Q4 2025*	Q4 2022 – Q4 2025
<b>Cumulative residential units</b>	360 units	955 units	1,784 units	2,265 units	2,689 units	2,689 units

Notes: \*Plot H7 is anticipated to complete in Q3 2024, with the Highways Works A1, X1, CH1 and CH5 anticipated to complete in Q4 2025.

A1 (Crossing – Walworth Road); X1 (Footway Surfacing – Elephant Road / Walworth Road); CH1 and CH5 (Cycle Hire Docking Station – Elephant Road)