# 2.0 Scoped Out Topics

## 2.1 Introduction

2.1.1 The 2019 ESA assessed the maximum and minimum parameters associated with the consented scheme to ensure that a worst-case scenario was assessed in each case. The details submitted as part of this RMA for Plot 1 and the amended construction programme would not have any implications for the findings of some of these technical assessments. As such the following topics have not been considered as standalone chapters within this ECR.

- Waste;
- Ground Conditions;
- Water Resources and Flood Risk;
- Archaeology;
- Ecology – in light of updated survey information; and
- Socio-Economics.

2.1.2 The justification for this approach is discussed below.

## 2.2 Waste

2.2.1 The 2019 waste chapter identified that both LBTH and the North London Waste Authority have sufficient capacity to manage their respective share of the apportioned waste targets. It was determined that over the 13-year construction programme approximately 7,303 tonnes of waste would be generated per annum, while during the operational phase approximately 7,813 tonnes would be generated per annum.

2.2.2 Both a Site Waste Management Plan and Operational Waste Management Strategy have been proposed as mitigation measures and it was concluded that once implemented, the residual effects of waste and recycling will be negligible. As such, no additional mitigation measures are necessary.

2.2.3 Since the assessment was undertaken, the Institute for Environmental Management and Assessment has released guidance[1] on the assessment of waste in EIA. In addition, the North London Waste Plan[2] has been adopted by the London Borough of Hackney. This aims for net self sufficiency for all waste streams in North London, with waste management capacity to be developed for all anticipated waste within the boroughs covered by the Plan. The Plan notes the following rates of export to landfill per waste stream – 8 % for Local Authority Collected Waste (LACW), 33 % for

1 IEMA Guide to Materials and Waste in Environmental Impact Assessment (2020)

[2] North London Waste Plan (Adopted 2022)

Commercial and Industrial Waste (C&I) and 7 % for Construction and Demolition Waste (C&D). However, Plan targets for 2036 include a 1 % landfill rate for LACW, and maximum 4 % for C&I. Under these targets effects arising from waste would be negligible when the IEMA landfill diversion method for assessing effects from waste is used.

2.2.4 A Circular Economy Statement has been produced to support the Reserved Matters Application. Key commitments to reduce waste over the lifespan include:

- Aim for net-zero import/export of soil and incorporation of demolition and excavation material on Site as far as possible, subject to a pre-demolition audit;
- Minimising concrete as far as practicable;
- Lean design principles to reduce façade weight;
- Avoiding speculative finishing of retail spaces
- Design of the building to easily replace key components, flexible floorplates to allow easy reconfiguration, and materials chosen for durability;
- Standardised and modular components, offsite fabrication and minimal packaging as far as possible; and
- An 'end of life' strategy.

2.2.5 The North London Waste Plan includes projections of waste production that incorporate anticipated development within the relevant boroughs. There are therefore no further cumulative effects arising from the additional schemes included in the cumulative effects assessment.

2.2.6 Therefore no changes to the residual effects, including cumulative effects, or mitigation measures from those reported in the 2019 ESA are anticipated as a result of the confirmed details for Plot 1 or the changes in the construction programme and this has not been considered further in this report.

## 2.3 Ground Conditions

2.3.1 The 2019 ground conditions chapter identified that the surface level consists of Made Ground and the area was previously heavily bombed and asbestos surveys and abatement have previously taken place on Site. As such there could be contamination from previous site use. However, it was noted that the baseline assessment carried out for the 2015 application identified and described occasional low levels of ground contamination only.

2.3.2 Mitigation measures were considered for ground conditions via the CoCP, which would ensure that construction activities follow procedures than minimise harm from both existing contamination on site and any new contamination that could be introduced as a result of construction activities. It was concluded that the likely residual effects on site workers, nearby residents, site users, groundwater beneath the site, and on-site and nearby buildings are considered negligible in all cases.

2.3.3 Since the 2019 ES, the CLR11 guidance has been superseded by 'Land Contamination: Risk Management'. The basic principles of assessment of contaminated land remain as previously set out, including the source-pathway-receptor approach, and this updated guidance has no implications for the findings of the assessment.

2.3.4 An updated Phase 1 Land Quality Preliminary Risk Assessment has been undertaken in September 2023 to provide an updated land contamination focussed desk study. Based on the findings of the desk study and current Site use, an assessment of land quality has been undertaken in accordance with current guidance and best practice.

2.3.5 On this basis, the potential risk to human health is considered to be moderate. The potential risk to the wider environment is assessed to be moderate to low on the basis it is underlain by secondary and principal aquifers with high vulnerability.

2.3.6 The extent and depth of the basement would be within the parameters set out in the 2019 ESA. The piling operations would be as set out in the 2019 ESA, with bored piles using bentonite fluid to stabilise the bore shaft, extending into the Thanet Sand. The shortened construction programme would have no implications for the ground conditions effects of the Proposed Development as reported in the 2019 ESA.

2.3.7 Since the 2019 ESA, a planning application has been submitted and approved for the adjacent Huntingdon Industrial Estate. The Environmental Statement submitted in support of the Huntingdon Industrial Estate application identified no significant effects associated with ground contamination - all effects would be negligible or minor beneficial with the application of mitigation measures. It is therefore concluded that the cumulative effects assessment with relation to ground conditions remains valid.

2.3.8 Therefore no changes to the residual effects, including cumulative effects, or mitigation measures from those reported in the 2019 ESA are anticipated as a result of the confirmed details for Plot 1 or the changes in the construction programme and this has not been considered further in this report.

## 2.4 Water Resources

2.4.1 The 2019 water resources chapter identified that the Site is at a low risk of flooding by rivers but there is a risk of limited flooding from surface water at present. It was determined that the construction phase could give rise to water and/or groundwater pollution and that once operational could change the surface water runoff from the Site. It was also stated that the development would increase water demand and the production of effluent from the Site and that pollution leaks and spillages may contaminate the drainage system.

2.4.2 Mitigation measures were considered for water resource via a Drainage Strategy that will reduce surface water run-off by holding and treating water on site and the residential development will be equipped with efficient water devices to reduce water usage per inhabitant. It was concluded that, once operational, there is likely to be a

permanent improvement to surface water runoff quantity and a reduction in the possibility of flooding on the Site and in the surrounding area; this is due to the creation of a modern drainage system on site.

2.4.3 The construction methodology would be in line with that set out in the 2019 ESA, including the necessary mitigation, and as such the shortened construction programme would have no implications for the finding of the construction phase assessment.

2.4.4 The Drainage Strategy will be updated and submitted prior to construction of each phase as secured by condition 25 (LBH) and 24 (LBTH). This will include consideration of the changes to climate change allowances that have been introduced since the 2019 ESA. The level of hardstanding and landscaping, and the drainage strategy, remain as per the 2019 ESA. There is therefore no change to the conclusions of the operational phase effects.

2.4.5 The Environmental Statement submitted in support of the Huntingdon Industrial Estate application did not scope in water resources. It is therefore concluded that the cumulative effects assessment with relation to water resources remains valid.

2.4.6 Therefore no changes to the residual effects, including cumulative effects, or mitigation measures from those reported in the 2019 ESA are anticipated as a result of the confirmed details for Plot 1 or the changes in the construction programme and this has not been considered further in this report.

## 2.5 Archaeology

2.5.1 The 2019 archaeology chapter identified that the Site has a low potential to contain prehistoric, Roman or Saxon remains; a moderate potential to contain later medieval remains; a high potential to contain post-medieval remains of medium significance and a very high potential to contain 19th century railway remains of medium significance. It was stated that the effects of construction and demolition are likely to be greatest at Plots 1 and 2, which will have accompanying basements. A permanent, direct, major-moderate adverse effect before mitigation was anticipated for post-medieval and 19th century remains in this area, representing the greatest potential impact on the site pre-mitigation.

2.5.2 Mitigation measures were considered for archaeology via targeted archaeological excavation in advance of preliminary ground works and the excavations for basements and foundations, as well as an archaeological watching brief in areas not affected by deep ground intrusions. With the implementation of the proposed mitigation, the residual effects would be a mix of negligible and minor adverse.

2.5.3 The archaeological desk based assessment has been updated to support the RMA. It is supported by an updated Greater London Historic Environment Record (GLHER) search and also considers the implications of changing policy, including changes to the National Planning Policy Framework and the adoption of the London Plan and the

LB Hackney Local Plan. It concludes that the findings of the ES chapter would not be materially affected by the updated baseline presented in the 2023 archaeological desk based assessment.

2.5.4 The Environmental Statement submitted in support of the Huntingdon Industrial Estate application did not scope in archaeology. It is therefore concluded that the cumulative effects assessment with relation to archaeology remains valid.

2.5.5 Therefore no changes to the residual effects, including cumulative effects, or mitigation measures from those reported in the 2019 ESA are anticipated as a result of the confirmed details for Plot 1 or the changes in the construction programme and this has not been considered further in this report.

## 2.6 Ecology

2.6.1 The 2019 ecology chapter identified six non-statutory designated sites for nature and ecology within 1 km of the Site, with the closest being Spitalfields City Farm and Allen Gardens SINC, which is 100 m to the east of the Site and is designated as important at the Borough level. A Phase 1 Habitat Survey was undertaken and surveys were carried out for bat roosting and activity, black redstart, terrestrial invertebrates and reptiles. The invertebrate and black redstart populations are important at the metropolitan/borough level. The nesting bird and foraging bat populations were assessed as important at the local level only. All other habitats and species present were assessed as of importance in the vicinity of the Site only. The Site is of negligible importance for roosting bats.

2.6.2 Mitigation measures were considered for ecology such as avoiding accidental spillage of chemicals; timing the removal of scrub, shrubs and trees outside of the bird breeding season; the provision of bird boxes; the planting of hedges and trees; and the creation of living roofs, new open mosaic habitat; species rich lawn and additional landscape planting of wildlife value. Additionally, appropriate mitigation was proposed for bats to ensure no net loss of roost sites. Inclusive of mitigation, the assessment of impact would lead to a non-significant minor adverse effect on invertebrates during the construction phase, with negligible effects during construction or operation on the rest of the ecology of the Site.

2.6.3 An updated PEA was undertaken in September 2022 which determined that the Site is in a highly urban area and the habitats on the Site were of moderate ecological value. The habitats on the Site have largely stayed the same except for 'Open Mosaic' habitats which have been reduced significantly due to scrub encroachment. The Site could support nesting birds (non-Schedule 1) in the old brick walls of the archways and within scattered trees and scrub vegetation. Black redstart (Schedule 1 species), could utilise the on-site habitats if they are left undisturbed.

2.6.4 The archways, tunnels and the building on-site also supported the potential for roosting bats, as well as the continuous scrub on site and a railway corridor on the

southern boundary offering good foraging and commuting habitat for bats. The Site has previously been surveyed for reptiles and they were found to be absent, it is unlikely that reptiles are present but precautionary measures should be undertaken when clearing the Site. This invasive plant species (listed on Schedule 9 of the WCA) has been recorded on the Site.

2.6.5 In an updated bat survey undertaken in September 20022 it was determined that no bats were recorded emerging or re-entering from the Site during the presence / absence surveys. Therefore, it can be concluded that summer roosting bats are likely absent from the development site. Five species of bat were recorded during the static bat surveys: common pipistrelle, Soprano pipistrelle, Nathusius' pipistrelle, Serotine and Myotis spp. The majority of registrations were not close to dawn or dusk time and therefore are thought to be using the Site for foraging and commuting rather than roosting.

2.6.6 The confirmed details in this RMA have no implications for the findings of the 2019 ESA for ecology. The 2019 ESA identified that Plot 1 provided opportunities for landscaping predominantly in the form of accessible roof and terrace gardens, with small areas of biodiverse roof. A greater area of biodiverse roof is provided than originally proposed in 2019. In addition, street trees at Shoreditch High Street and on Middle Street are proposed, not identified in the 2019 ESA. Plot 1 achieves an Urban Greening Factor score of 0.15 with a site-wide Urban Greening Factor score of 0.3 anticipated and Biodiversity Net Gain of 261.82%.

2.6.7 The shortened construction programme will mean a reduced construction duration, however a greater amount of simultaneous construction work will be undertaken.

2.6.8 The Environmental Statement submitted in support of the Huntingdon Industrial Estate application did not scope in ecology. It is therefore concluded that the cumulative effects assessment with relation to ecology remains valid.

2.6.9 Therefore no changes to the residual effects, including cumulative effects, or mitigation measures from those reported in the 2019 ESA are anticipated as a result of the confirmed details for Plot 1 or the changes in the construction programme and this has not been considered further in this report.

## 2.7 Socioeconomics

2.7.1 The 2019 socioeconomics chapter identified that the sensitivity with a projected surplus of primary school places, a shortfall of secondary school places, sufficient capacity for healthcare, childcare and community facilities, but with limited nearby open and play space and a high level of crime and anti-social behaviour.

2.7.2 This baseline remains broadly the case in 2023, however a new secondary school (Shoreditch Park Academy) has since opened 1.9 km walking distance from the Site, reducing the sensitivity of secondary schools by providing further places.

2.7.3 It was stated that there were non-significant minor adverse effects from the additional population on childcare and education provisions. A significant beneficial effect was also stated for the housing stock in LBTH from the 346-500 dwellings (inclusive of affordable housing) being introduced. During the operational phase the increase in employment was considered a moderate-minor beneficial effect, as was the impact of increased housing supply. The scheme was cited as having the potential to increase the absolute crime rate but was deemed unlikely to increase the relative crime rate and could reduce it due to the Secured by Design measures.

2.7.4 Mitigation measures were considered for socioeconomics via a Community Infrastructure Levy (CIL) payment to be made to both LBH and LBTH, which could be used to fund a wide range of infrastructure (including childcare, education, healthcare and community facilities). Crime related mitigation measures included securing the Site to prevent unauthorised access during construction and Secured by Design measures taken in the design. With the implementation of the crime mitigation, the residual effects would be negligible.

2.7.5 Plot 1 provides only commercial space, and therefore the only operational effects that have the potential to be altered by the confirmed details would be operational job creation. The total commercial floorspace is 48,227 $m^2$ (GIA) which is within the parameters for Plot 1 assessed in the 2019 ESA. There would therefore be no changes to the conclusions on operational employment from the details of Plot 1.

2.7.6 Nonetheless, operational employment has been estimated for Plot 1 in isolation. In order to estimate the operational jobs, the former Homes & Communities Agency (HCA) Employment Density Guide 3rd Edition has been used. This Guide provides an employment density ratio for each class use based on the average floorspace (in $m^2$) per FTE member of staff. Worst case densities have been applied.

**Table 2.1 Gross Operational employment – Plot 1 in isolation**

| Use type | Floorspace ($m^2$ NIA) | Employment Density ($m^2$/FTE) | Gross Employees (FTE) |
|---|---|---|---|
| Offices | 36,623 | 13 | 2,817 |
| Retail | 648 | 20 | 32 |
| Total | | | 2,849 |

**Table 2.2 Net Operational Employment**

| Adjustment Factors | |
|---|---|
| Gross direct jobs | 2,849 |
| Leakage, 10% | -285 |
| Gross local direct jobs | 2,564 |
| Displacement -25% | -641 |
| Net local direct jobs | 1,923 |
| Multiplier, +30% | 577 |
| Net additional employment | 2,500 |

2.7.7 As Plot 1 would not introduce any new residential receptors into the Site, the confirmation of details of Plot 1 would have no implications for impact on housing

demand or any of the assessments driven by estimates of population and child yield, such as increased labour supply and skills, education demand, community and recreational facilities, open and play space, and health services and facilities.

2.7.8 Plot 1 currently holds temporary retail, food and drink and entertainment commercial uses within the Box Park Shoreditch meanwhile development. Plot 1 would introduce 702 $m^2$ (GIA) of retail uses at ground floor, which would be expected to be of a similar nature to that provided by the Box Park with similar employment opportunities.

2.7.9 Plot 1 would also introduce an additional 48,227 $m^2$ (GIA) of office use. Plot 1 is situated in the west of the wider Bishopsgate Goodsyard site, adjacent to Shoreditch High Street. This is a central location within the City Fringe Opportunity Area, designated for housing and office space to support London's financial and business services as well as digital-creative businesses. A number of office-led developments in the immediate area are currently under construction including the Blossom Street, Huntingdon Estate, 201-207 Shoreditch High Street, GFI House and Shoreditch Village developments, and Plot 1 would be expected to contribute towards this uplift in office space in the vicinity of Shoreditch High Street and Commercial Road. As Plot 1 is introducing employment uses into the immediate surroundings that reflect those already provided or being provided in the surrounding area there is not expected to be any implications for community cohesion.

2.7.10 The amended construction programme would reduce the duration of all construction effects however as there is minimal change to the construction methodology the expected job creation will remain similar. In short, a greater number of jobs would be created in a reduced timeframe. The findings of the 2019 ESA would remain valid.

2.7.11 The Environmental Statement submitted in support of the Huntingdon Industrial Estate application identified major beneficial significant effects associated with socio-economics for employment opportunities - all effects would be negligible or minor to major beneficial with the application of mitigation measures. It is therefore concluded that the cumulative effects assessment with relation to socio-economics remains valid as no additional adverse effects were identified.

2.7.12 Therefore, no changes to the residual effects, including cumulative effects, or mitigation measures from those reported in the 2019 ESA are anticipated as a result of the confirmed details for Plot 1 or the changes in the construction programme and this has not been considered further in this report.

2.7.13 The details submitted as part of this RMA for Plot 1 and the amended construction programme would not have any implications for the findings of some of these technical assessments. As such the following topics have not been considered as standalone chapters within this ECR.

- Waste;
- Ground Conditions;
- Water Resources and Flood Risk;

- Archaeology;
- Ecology – in light of updated survey information; and
- Socio-Economics.