

Appendix: Methodology

Annex 1: EIA Scoping Report

Annex 2: EIA Scoping Opinion

Annex 3: EIA Scoping Opinion Response

Annex 4: Cumulative Schemes List and Map

Annex 5: Cumulative Schemes Assessment Matrix

Aberfeldy Village Masterplan EIA Scoping Opinion Response

Aberfeldy Village EIA Scoping Opinion Response

This EIA Scoping Opinion Response document constitutes the response of the Applicant to the EIA Scoping Opinion received from the London Borough of Tower Hamlets (LBTH) on the 8th September 2021 relating to the EIA for the redevelopment of the Aberfeldy Village. This document is structured as follows in accordance with the structure set out within the LBTHs' Environmental Impact Assessment (EIA) Scoping Opinion:

- **Table 1** EIA Scoping Opinion Response, Section 2 EIA Process Requirements;
- **Table 2** EIA Scoping – Topics Scoped In; and
- **Table 3** EIA Scoping – Topics Scoped Out.

The document only responds to any areas where further clarification or justification has been considered necessary by the Applicant's EIA Team, all other comments raised in the scoping opinion have been addressed directly through the ES (Volumes 1 and 2).

Table 1: EIA Scoping Opinion (SO) Response, Section 2 EIA Process Requirements

SO Section Ref.	Comment Within the LBTH Scoping Opinion	Applicant's EIA Team Response
2.0 The Proposed Development		
2.2 General Comments	Where different floorspace measurements are used e.g. Gross External Area (GEA), General Internal Area (GIA) and Net Internal Area (NIA), the ES should clearly identify how these have been calculated, based on which drawings and how the figures relate to one another.	This information is presented within ES Volume 1, Chapter 4: The Proposed Development and as appropriate within ES Volume 1, Chapter 5-14
	The ES should ensure consequential effects of plant are assessed as required, in terms of flue location and noise.	This has been assessed within ES Volume 1, Chapter 8: Air Quality and ES Volume 1, Chapter 10: Noise and Vibration.
	Soft landscaping should be prioritised within the Proposed Development which, where possible, should incorporate dual uses e.g. biodiversity benefits, flood attenuation/Sustainable Drainage Systems (SuDS), and wind mitigation.	The information is presented within ES Volume 1, Chapter 4: The Proposed Development and ES Volume 1, Chapter 8: Air Quality and ES Volume 1, Chapter 10: Noise and Vibration.
	The Applicant should take into account the locations of any utilities within or crossing the Application Site; should these need to be redirected or upgraded as a result of the Proposed Development, consultation should be undertaken with the relevant stakeholders.	The impact of any utilities within or crossing the Site have been considered as part of the Utilities Assessment and as appropriate considered within ES Volume 1, Chapter 5: Demolition and Construction.
2.3 Demolition and Construction	No reference is made within the Scoping Report to the lifespan (or decommissioning) of the Proposed Development. The intended lifespan of the Proposed Development is to be considered in the ES.	Consideration of the decommissioning of the Proposed Development is not a requirement of the EIA Regulations relevant to this project, and therefore has not been assessed in the EIA or discussed any further in this ES.
	Noting the 120-month construction period and as Paragraph 5 of the Scoping Report states that the Proposed Development would replace Phases 4 to 6 of the OPP, and Paragraph 86 of the Scoping Report refers to a phased construction and occupation of the Proposed Development, the Applicant should consider how a reasonable worst-case scenario can be identified and new sensitive receptors (i.e. residents) assessed and make clear how this has been considered. Any phasing as presented in the ES would then be fixed by planning condition.	A Phasing Parameter Plan has been submitted with the Planning Application. ES Volume 1, Chapter 2: Methodology presents how a reasonable worst-case scenario has been identified for each of the technical assessments.
	The Proposed Development should include a description of any temporary works (noting the 120-month construction phase) required to facilitate any partial use of the Application Site, prior to completion of the Proposed Development.	No temporary site uses are currently envisaged for the Proposed Development.
3.0 Review of the Methodology and Scope of the EIA		
3.2 Significance Criteria	Table 3 of the Scoping Report refers to classifying effects as adverse, beneficial, or neutral. LBTH consider that the classification of 'neutral' effects is to be used where there is no meaningful change to a receptor. However, LBTH do not consider it is appropriate to imply that neutral effects can be significant e.g. moderate neutral effect, as this counters the normal use of this word both in general usage and EIA practice. Although LBTH note that the Scoping Report only proposes to use the term neutral with regards to the Townscape and Visual Impact Assessment.	Noted, however, in relation to townscape visual impact effects are assessed as beneficial, adverse, or neutral. This is in line with guidance in the GLVIA which states that a professional judgement should be made as to whether effects can be described as <i>'...positive or negative (or in some cases neutral)...'</i> (see GLVIA paragraph 5.37 in reference to landscape/ townscape, and paragraph 6.29 (from which the preceding quoted extract is taken) for visual effects). The assessment as beneficial or adverse is a 'net equation', since with regard to the receptor that is being assessed, there may be both positive and negative effects as a result of the Proposed Development.

4.12 Cumulative Effects

<p>4.12.2</p>	<p>The cumulative effects assessments (both inter and intra-project assessment) should consider likely effects on specific receptors and or groups of receptors, in addition to general aspects of the environment. Cumulative effects assessments should not just consider whether the magnitude of effects is greater, but also other aspects such as whether the duration of effects on a receptor are increased.</p> <p>LBTH have reviewed the list of cumulative schemes provided in Appendix C of the Scoping Report and has identified the following schemes for inclusion / consideration in the cumulative effects assessment:</p> <ul style="list-style-type: none"> • Areas 7 and IC Barking Road, Canning Town - 11/00662/LTGDC (within the London Borough of Newham Planning permission granted) • Blackwall Reach - PA/12/02752, PA/14/02480, PA/16/01958/P3 (planning permission granted) and PA/20/02371 (likely to be determined before the Proposed Development); • Aberfeldy Estate – PA/11/02716, PA/11/03548, PA/13/01844, PA/15/00002, and PA/15/01826 (planning permission granted); • 116-118 Chrisp Street - PA/14/02928 (planning permission granted); • Bromley by Bow North - PA/11/02423 (planning permission granted); • 43-45 Gillender Street - PA/19/01628 (planning permission granted); • Goodluck Hope - PA/19/02773 (likely to be determined before the Proposed Development); • 160 Chrisp Street - PA/15/00039 (Planning permission granted); • Bow Common – PA/19/02379 (Resolution to grant planning permission); • Stroudley Walk - PA/19/02292 (planning permission granted); • Blackwall Jetty - PA/21/00288 (likely to be determined before the Proposed Development); • Mulberry Place - PA/21/01304 (Scoping Opinion requested); • Land under the DLR bounded by Scouler Street, Aspen Way and Prestage Way - PA/19/02292 (planning permission granted); • Global Switch - PA/21/00986 (Could be determined before the Proposed Development); • 1 Paul Julius Close (Reuters) - PA/13/01861/A1 (planning permission granted); • North Quay - PA/20/01421/A1 (likely to be determined before the Proposed Development); • Tower Hamlets College, 112 Poplar High Street - PA/19/02067/NC (scoping opinion issued); • Chrisp Street Market – PA/21/01975 (scoping opinion requested); • Trinity Buoy Wharf - PA/17/00729 and PA/19/00957 (planning permission granted); and • The Silvertown Tunnel Order (2018). 	<p>Where relevant the cumulative schemes assessment considers potential impacts that may arise during the Proposed Development's peak construction period in combination with other developments that are also under construction at the same time.</p> <p>A scoping exercise has been undertaken which has identified cumulative schemes likely to be under construction at the same time as the Proposed Development. Further details in regard to this scoping exercise is presented within the ES Volume 1, Chapter 2: Methodology.</p> <p>The following has been considered when undertaking the scoping exercise:</p> <ul style="list-style-type: none"> • The likelihood of the other cumulative schemes being constructed concurrently to the Proposed Development; • The likelihood that the same or similar HGV traffic routes as the Proposed Development will be used for the cumulative schemes; • The proximity of the cumulative schemes to the Proposed Development site and the potential for surrounding receptors to experience 'in combination' or 'cumulative' effects as a result of the Proposed Development being constructed concurrently with the cumulative schemes; and • The amount of information available to be assessed i.e. whether the cumulative schemes only have a scoping report and are therefore not able to be assessed in terms of massing studies. <p>These additional schemes have been considered and the below responses relate to those which are not considered to be cumulative schemes for this Site.</p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="text-align: left;">Scheme</th> <th style="text-align: left;">Response</th> </tr> </thead> <tbody> <tr> <td>Mulberry Place - PA/21/01304 (Scoping Opinion requested);</td> <td>Although the Scoping Opinion has been submitted, there is insufficient information available to undertake an assessment of the cumulative effects of this scheme.</td> </tr> <tr> <td>Global Switch - PA/21/00986 (Could be determined before the Proposed Development);</td> <td>Although the scheme is located nearby, the five level phased external plant has no cumulative interactions with the Proposed Development as it is not generating population or additional sensitive receptors. 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Table 2: EIA Scoping – Topics Scoped In

4.1 Air Quality		
4.1.2 General Comments	The ES is to ensure that realistic background air quality concentrations are used in the assessment, and a robust model verification exercise is undertaken. Any limitations should be clearly stated. It is considered that current baseline and future year projections are to be based on the LAEI (20 m2 grid reference) and Tower Hamlets monitoring data. LBTH notes that in addition to verifying modelling against existing monitoring data in the area, air quality monitoring for nitrogen dioxide will be undertaken at the Application Site (over a minimum period of three months), in order to provide further confidence in the modelled predictions. LBTH considers this to be appropriate.	During the assessment period between March 2020 and June 2021, travel had been significantly limited by restrictions that were implemented as part of the Government's response to the COVID-19 pandemic. Consequently this has affected transport movements at the time hence at the time of undertaking the baseline air quality work in early 2021, it was not considered representative to undertake air quality monitoring. Instead, existing LBTH monitoring data was used.
4.3 Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare		
4.3.2 General Comments	<p>It is noted that light pollution is included in the aspect chapter title in the Scoping Report; however, this matter is dealt with in Paragraph 169 of the Scoping Report which provides a discussion proposing to scope out an assessment of light pollution due to the residential nature of the Proposed Development. LBTH agrees that this is acceptable for the residential element of the Proposed Development; however, LBTH notes that approximately 7,500 sqm GIA of non-residential uses (including restaurant, retail and office (Use Class E(a), E(b) and E(g))) will be provided. Therefore, LBTH expects that a light pollution assessment should be undertaken for the non-residential uses of the Proposed Development or justification should be provided in the ES, if it is considered that such an assessment is not required.</p> <p>The study area and individual properties assessed should be clearly stated and justified within the ES and shown on a figure for ease of understanding. It is noted that a list of receptors to be considered has been provided in Paragraph 175 of the Scoping Report, however no figure is provided so the exact receptors to be assessed is not known. Reference is made to Aberfeldy Road, which is understood to refer to Aberfeldy Street, and Carndale House, which is understood to refer to Carradale House. Bromley Hall School, Poplar Baptist Church, River Thames and Tidal Tributaries SINC, and receptors on Brion Place should be identified as receptors.</p>	<p>Light pollution is defined as any light emitting from artificial sources into spaces where it is unwanted, such as spillage of light from office or commercial buildings onto residential accommodation, where this would cause nuisance to the occupants</p> <p>The elements of the Proposed Development which are detailed comprise primarily residential uses which are not considered to be a source of light intrusion and therefore do not require assessment. The commercial uses proposed are not considered likely to result in any significant light intrusion effects, owing to the relative distance from sensitive uses and are therefore not assessed.</p> <p>As a mixed-use scheme, there is the potential for the proposed residential elements to be located within 20 meters of commercial buildings and thus considered future sensitive receptors in terms of light pollution. However, the non-residential uses of Proposed Development comprising commercial uses are currently proposed in outline and as such no light pollution assessment can be undertaken at this time. An assessment of the light pollution effects relies on the detailed design of the scheme, for both the commercial buildings that would emit the artificial lighting and the apertures of the proposed residential buildings. Owing to the application for the Proposed Development being partly in outline, the façade materials, including glazing, as well as the lighting design, internal layouts and room uses are not yet known for the outline element. As such, a full detailed analysis for solar glare and light pollution cannot be undertaken at this stage in respect of the outline element. Any emerging lighting strategy will be designed with respect to the ILP Guidance Notes and will ensure that any significant effects are mitigated as part of the detailed design development</p> <p>A map of receptors with buildings, clearly identified, with naming corrections are provided within ES Volume 1, Chapter 12: Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare within Figures 12.1, 12.2 and 12.3.</p> <p>The additional buildings, Bromley Hall School, Poplar Baptist Church and receptors on Brion Place are considered in the Sensitive Receptors Section, with the likely significant effects considered in the Potential Effects Section.</p> <p>The River Thames is south of the Proposed Development and therefore not considered sensitive. Bow Creek / River Lea are Tidal Tributaries which are assessed as sensitive receptors.</p>
4.3.4 Operation	<p>The Applicant is also required to provide a summary table for daylight, which includes the following:</p> <ul style="list-style-type: none"> - The receptor (i.e. each building); - The number of windows / rooms in the receptor tested; - The number of windows / rooms which meet the BRE criteria; - The number of windows / rooms which do not meet the BRE criteria, split by minor, moderate and major significance, as per the criteria outlined above; - The number of dwellings affected; and - Commentary on minor, moderate and major sunlight and daylight losses. 	<p>Information about dwellings is not always available and as such reporting by dwellings is not a viable option.</p> <p>A summary table has been provided within the ES chapter detailing the number of windows/rooms tested and affected per receptor, split by minor, moderate and major effects. The daylight and sunlight technical results report on the specific windows and rooms which impacts occur, which are mapped on corresponding illustrations whereby the individual effects can be identified.</p>
4.5 Health		
4.5.2 General Comments	<p>The Applicant is advised to consider integrating the HIA into the EIA to minimise duplication and facilitate enhanced consideration of health within the EIA as well as meeting the requirements of both the HIA policy and the EIA Regulations.</p> <p>the introductory section of the ES should contain a table which provides a clear cross-reference to where the relevant information on human health is located in the ES, such as within the HIA, wind microclimate (including strong wind occurrences), daylight, sunlight and overshadowing, socio-economics, air quality, noise and vibration, transport aspect, ground conditions, water environment chapters of the ES.</p>	<p>A table is provided in ES Volume 1, Chapter 2: EIA Methodology which provides reference to relevant information on human health located in the ES</p> <p>The application is supported by a detailed Health Impact Assessment in accordance with LBTH policy D.SG3. The scope of the HIA has been agreed with LBTH Health Impact Assessment Officer. The HIA will</p>

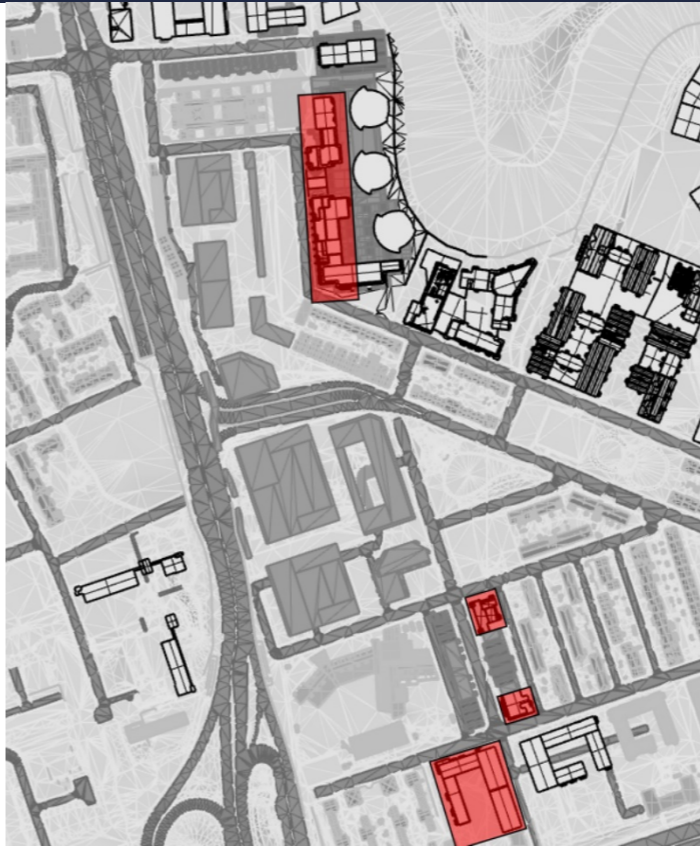
<p>In accordance with LBTH policy D.SG3, and policy within the NPPF and London Plan, a detailed HIA is to be submitted in support of the planning application. Any likely significant effects identified within the HIA should be further assessed as part of the EIA. It should be noted that the emerging policy requires <i>'Developments of a scale referable to the Greater London Authority (as set out in legislation) are required to complete and submit a detailed health impact assessment as part of the planning application'</i>. Detailed HIAs must be informed by sufficient consultation, in order to identify the relevant health determinants for the Proposed Development and assess their impact. It is noted from Paragraph 221 of the Scoping Report that the scope of the detailed HIA has been discussed with the LBTH's HIA Officer (in May 2021). The required consultation is to also be agreed with LBTH's HIA Officer.</p>	<p>include reference to supporting documents (such as ES Chapters) to further understand methodology, approach as agreed with LBTH Health Impact Assessment Officer.</p> <p>Any likely significant effects identified within the HIA are included in the ES.</p> <p>The HIA utilises the Sports England's Active Design to evaluate the design and layout principles of the proposal.</p>
<p>The HIA is to be structure around the following key themes, as identified within LBTH's HIA Guidance (2021):</p> <ul style="list-style-type: none"> • Delivering healthy layouts; • Promoting neighbourhood cohesion; • Enabling active living; and • Creating the healthiest of environments. 	<p>The Local Impact Area used in the HIA is commensurate with the appropriate impact areas used to assess the significance of effects across the range of health determinants and where possible is consistent with local impact areas used in the ES for such purposes.</p>
<p>The Applicant is reminded that all likely significant effects must be identified and assessed within the ES. The ES is to clearly state whether the HIA identified likely significant effects, and where such effects are assessed within the ES.</p>	
<p>Community engagement will offer a qualitative impact analysis of those who will experience living on or near the Application Site and who might suffer or benefit from its many features and their combined health impact. While it might be difficult to quantify the impact of any single risk factor/determinant of health (as per HUDU checklist), it is therefore important for the Applicant to take into account the experience of the local population. The criteria questions in the Tower Hamlets HIA guidance can help inform consultation on health.</p>	
<p>HIA has a broad remit to assess a number of determinants of health at building or site level including housing quality and design, access to healthcare and other social infrastructure, access to open space and nature, air quality, noise and neighbourhood amenity, active travel, community safety, access to healthy food, access to work and training, climate change. The HIA is to assess their impact on a range of health outcomes including physical, mental, environmental health as well as health equity and safety.</p>	
<p>With regards to the HIA, evidence shows that design and layout have an impact on behaviour pattern. While the Applicant cannot anticipate the ways buildings and spaces are used or other lifestyle factors of future residents, the Applicant must ensure that the proposed site layout maximises the health benefits, promotes communal/open space promoting cohesion, enables active living and contributes to environmental sustainability, all key factors for health. The Applicant is reminded that the way buildings and spaces are used is also determined by their availability, accessibility, design and maintenance, all of which can be considered at planning stage. The analysis of health risk factors at various relevant spatial scales (room, building, street, site and neighbourhood levels) is required as a range of smaller and consistent negative design issues can potentially affect human health.</p>	
<p>LBTH recommend the Applicant refers to Sports England's Active Design for instance to ensure that active design principles are embedded into the design and layout of their development to meet planning and transport objectives (see p. 56 Sports England's Active Design). Furthermore, the HIA will need to consider the impact not just on the Application Site but on the wider population. The Applicant must identify an impact area in view of the size of the development, the local demographics and existence of local infrastructure around the Application Site.</p>	

4.6 Socio-Economics		
4.6.2 General Comments	The Scoping Report does not identify whether the effects on dentists, nurseries, leisure and other community facilities will be considered within the ES. The ES should consider the potential effects on these or provide justification as to why not assessed. The Applicant is reminded it is not acceptable to scope out aspect or matters on the basis of difficulty undertaking the assessments.	Effects on dentists, nurseries, leisure and community facilities are considered in the ES chapter. Where available, capacity is assessed using local, regional or national benchmarks. If no published thresholds for capacity exist, a best-practice assessment has been used to determine assessment conclusions.
	Table 3 of the Scoping Report provides the matrix to determine effects for the socio-economic assessment. The matrix includes the classification that impacts of medium magnitude on assets of medium sensitivity, will result in a moderate effect. LBTH considers that this classification is proportionate. However, given this is in line with the overall methodology for the ES as set out in Table 2 (page 21) of the Scoping Report, the Applicant should consider the need for repeating matrix in the ES.	The level of affordable housing has been considered in line with LBTH's targets
	This assessment will need to include consideration of LBTH's affordable housing target i.e. a minimum of 35% (noting that sites on public land require a minimum of 50% to benefit from the fast track route, in accordance with the London Plan), and required housing mix i.e. 70% rented and 30% intermediate tenure split. Should the Proposed Development not meet LBTH's affordable housing target, this should be assessed as being an adverse effect as the Proposed Development has failed to meet the communities' minimum need. If the affordable housing provision changes after the planning application has been submitted, reassessment may be required as part of the ES. The assessment should ensure that the new site users have access to sufficient levels of social infrastructure, such as health, and recreation etc.	The ES Chapter includes a section on receptors and study area with descriptors and justification. Worst-case scenario has been used to assess all receptors within the Socio-economics ES Chapter, including assessment of employment generation
	The ES should clearly identify the receptors and study area in relation to socio-economics, surrounding and within the Application Site, and their sensitivity to potential construction and operation works. This should include a map and appropriate descriptors.	Data sources are fully referenced throughout ES Volume 1, Chapter 6: Socioeconomics
	The ES should clearly set out how all figures have been calculated (e.g. employment generation) and justified as appropriate, with reference to other relevant documents/aspect chapters where appropriate and ensure this represents the worst-case scenario. This is particularly relevant for the assessment of the non-residential uses proposed, and it must be ensured the worst case has been assessed.	Whilst it is recognised that the London Borough of Newham is geographically proximate to the site boundary, it is considered the inclusion of London Borough of Newham within the affected impact areas is for the most part, not appropriate. The boundary of the two Boroughs closest to the site, aligns with the River Lea which is considered to be a significant physical barrier with currently only two places for potential crossover of residents (one of which connects directly to a waste management service and is considered unlikely to be used by the wider population). Moreover, currently the vast majority of land uses across the river within the London Borough of Newham include industrial, commercial and logistics uses which are highly unlikely to have a permanent resident population. Whilst there may be some commercial activity which could occur between the two places, it is considered unlikely that the delivery of the Proposed Development will have any significant or permanent impacts on the population within the area that falls within the London Borough of Newham. As such, it is considered the inclusion of London Borough of Newham within the assessed impact areas of the Chapter is not appropriate. However, for receptors such as primary health care, where a radius is used, parts of this may fall within LB Newham – in which case this has been taken in to account.
	The data sources are to be fully referenced with relevant comments regarding the reliability of such data and any other limitations. Given the proximity of London Borough of Newham to the Application it is considered that local effects will affect areas within London Borough of Newham, and therefore the baseline and subsequent assessments are to consider London Borough of Newham in addition to LBTH.	Consultation emails will be sent out to relevant organisations, including Tower Hamlets Clinical Commissioning Group and LBTH's Education department to ensure data is up-to-date and consistent with latest trends.
	LBTH consider that consultation should be undertaken to ensure data utilised in the assessment is up to date, for example patient data for doctor's surgeries, and school place data. The socio-economic assessment should ensure the most up to date data informs the assessment and clearly state any assumptions and limitations. The ES should summarise any consultation activity that has been undertaken with appropriate organisations.	
4.6.3 Demolition and Construction	LBTH has an above average unemployment level within Greater London. LBTH will seek to ensure that jobs are provided for local people, both in the construction phase of the Proposed Development and by the end-users, where appropriate.	HCA's Employment Density Guide (2015) has been applied to estimate employment levels for the Proposed Development. Consideration has been given to any loss of existing employment on-site and if there is any potential displacement of business during construction & demolition phases.
	When calculating employment figures the Homes and Community Agency's (HCA) Employment Densities Guide should be used. Where there are a range of 'area per Full Time Equivalents (FTE)', information should be provided on why a specific figure has been used. It should be noted that the HCA guide references both GIA and NIA, and therefore the EIA should ensure that the correct figures are used for the correct land uses. Specific consideration should be given to the loss of current employment within the Application Site and the potential disruption of businesses adjacent to and in proximity of the Application Site during demolition and construction.	The LBTH Child Yield Calculator has been used to determine level of children to be generated by Proposed Development
	It is noted that Paragraph 240 of the Scoping Report states that the child yield anticipated to arise from the Proposed Development will be calculated based on the GLA Population Yield Calculator. LBTH requires that LBTH's Child Yield Calculator is used inform the socio-economic assessments.	Assessments of demand for community facilities has been included in the chapter including likely population increase from cumulative schemes where possible.
	The future baseline and cumulative effects will be an important assessment in relation to the socio-economic aspect chapter, and the assessment should ensure that the new site users have access to sufficient levels of social infrastructure, such as health, education, open space and play space on a phase-by-phase basis. Assessments of demand for community facilities should be supported quantitative information including likely population increase from cumulative schemes where possible.	Adverse effects are described and appropriate mitigation measures have been proposed

4.8 Traffic and Transport	
4.8.2	<p>Mitigation measures for buses, especially route 309 and any potential rerouting, should clearly identify how the measures will be secured and acknowledge where mitigation is within the Applicant's control and when it is not. Table 5 of the Scoping Report notes that during demolition and construction, severance and amenity, fear and intimidation will be assessed for local roads only. It also notes that severance, pedestrian and cyclist delay, vehicle and bus delay, amenity, fear and intimidation and accidents and safety will be assessed during operation. LBTH consider that pedestrian and cyclist delay, vehicle and bus delay, accidents and safety are to be scoped into the assessment during demolition, and construction. It is agreed that the assessment of hazardous loads can be scoped out of the ES on the basis on hazardous loads would be generated as a result of the Proposed Development.</p>
	<p>A Traffic and Transport ES chapter is required to comply with specific national guidelines as set out in DMRB LA104 and the Guidelines for the Environmental Assessment of Road Traffic (GEART). The specific impacts to be assessed are set out in the standards and are as follows:</p> <ul style="list-style-type: none"> • Severance • Driver Delay • Pedestrian Delay • Pedestrian Amenity • Fear and Intimidation • Accidents and Safety • Hazardous Loads <p>Specific EIA thresholds for these impacts exist so that the magnitude and significance of the environmental impact can be determined in line with DMRB and GEART. However, pedestrians, cyclists, drivers, and public transport passengers can be included as separate receptors as part of the assessment so that the impacts as set out above on each of these receptor groups can be determined.</p>
	<p>LBTH considers that rail delay and the effects on public transport should be assessed for operation and, therefore, must be scoped in. As part of the assessment of public transport, station capacity assessments for London Underground and DLR stations, and line loading assessments are to be undertaken and agreed with LBTH and TfL.</p>
	<p>Rail delay and "effects" on public transport are not included in national guidance and no EIA thresholds for these impacts exists. Therefore, they are not be included in the ES chapter. However, the impact of public transport demand on the capacity of the public transport network, including rail, forms part of the TA.</p>
	<p>No consideration has been given to junction capacity within the Scoping Report. This matter is considered to be scoped in unless it can be sufficiently justified that significant effects are not likely. The Applicant is advised to consult with LBTH and TfL in this regard.</p>
	<p>The Proposed Development will not result in an increase in vehicle trips on the network. It is acknowledged that the proposed closure of the underpass will result in redistribution of traffic on the strategic network but a reduction in traffic on B125 Abbott Road will occur as well. Strategic modelling has been undertaken and microsimulation is underway which will assess the junctions that will be impacted by the closure of the underpass. The result of this modelling informs the driver delay and severance environmental impact assessment.</p>
	<p>In addition to the above, appropriate consideration must be given to the timeframe of when Abbott Road diversions will be delivered. For example, if Abbott Road will be closed to vehicular traffic early during the construction phase, then this must also be assessed during construction.</p>
	<p>The peak construction traffic is expected to occur in April/May 2026 during Phase B. The underpass will not be closed until after the peak construction traffic has taken place. However the routing of vehicles will only change slightly with the closure of the underpass in future Phases with access from the A12 maintained via the re provided off-slip and egress from the site via B125 Abbott Road junction with the A13. The minor change in routing is not considered to have a material impact on construction traffic volumes along B125 Abbott Road, within other streets of the site or the strategic network.</p>
	<p>Proposed assessment scenarios set out:</p> <ul style="list-style-type: none"> • Existing baseline year • Assessment baseline (do nothing) • Assessment with development (do something) • Existing baseline plus peak hour construction vehicle movements • Interim scenario with partial occupation and partial construction of the development
	<p>While data from an existing baseline year has been used to establish the assessment future baseline year (2031), it has not been assessed separately against severance, delay, etc. as EIA is concerned with the impact or change of a proposal against a do-nothing baseline in the same year. Our proposed methodology is in line with BMRB LA104 and the 1993 IEMA guidelines.</p> <p>Peak construction in 2026 encompasses construction of Phase B of the Proposed Development. In this phase, the Detailed Proposals (Phase A) of the Proposed Development would be operational. However, as the Proposed Development will re-provide parking at a lower level than existing Site no increase in traffic is expected as a result of Phase A operation and therefore this has not been explicitly assessed as part of this scenario. For Phase B construction, construction vehicles will access and egress the site via the A12/Lochnagar Street junction. The Interim scenario year of 2026 has therefore been used to illustrate the partial occupation and partial construction.</p>
	<p>The detailed assessment methodology for this aspect chapter and the TA should be agreed in consultation with transportation officers at LBTH and TfL. Details of the consultation undertaken should be set out in the ES. The Applicant is advised to agree the trip generation and any modelling scope with LBTH and TfL, prior to submitting the application.</p>
	<p>Noted, extensive consultation has occurred and is ongoing with both LBTH and TfL.</p>

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4.8.3 Demolition and Construction	Cumulative impacts will be an important consideration given the location of the Proposed Development in an area of significant growth, particularly considering the cumulative schemes will introduce HGVs and construction traffic onto local streets at the same time as the Proposed Development.	An estimate of construction vehicle flows for nearby development has been included as part of the ES based on publicly available construction flows for those developments. It is noted that as the future year modelling is based on growth of existing traffic and existing traffic already includes some construction flows for construction around the area, some cumulative construction traffic will be inherent to the assessment.
4.8.4 Operation	The ES and TA must contain a multi-modal impact assessment including baseline and future vehicle (car, vans, Light Good Vehicles (LGVs) and Heavy Good Vehicles (HGVs)), public transport (bus, Crossrail, DLR, London Underground and Overground) and pedestrian and cycle trips and the overall mode share. Demand for individual mode of public transport should be assessed, and provide an estimate based on directions; this would enable determination of the need and size of mitigation required. A full multi-modal trip generation should be prepared using relevant data from TRICS and deriving mode share from recent proposals in similar locations.	The TA includes a multi-modal trip generation and capacity impact assessment, while the ES uses the vehicle trip generation from the TA to establish environmental effects as set out in DMRB LA104 and the 1993 GEART.
	Given the Mayoral focus on Healthy Streets, it would be useful to clearly integrate the Healthy Streets principles within the EIA and TA. Improvement measures where identified should be fully funded. Healthy Streets principles should be integrated into the ES. All streets in and around the Application Site should prioritise walking and cycling and, where vehicle access is necessary, streets should be designed for very low speeds where cars are guests. Active freight should be prioritised, and deliveries and servicing consolidated where possible. Bus priority should be improved to help maintain bus reliability and as an intrinsic element in the Healthy Streets Approach.	The TA has been produced in line with the Healthy Streets TA guidance and the proposed public realm improvements for the site have been developed in line with the Healthy Streets approach. Mitigation set out in the ES therefore includes Healthy Streets compliant measures.
	All servicing will be expected to take place within the boundaries of the Application Site, minimising the effect on the public highway. The way in which the Proposed Development is to be serviced should be clearly diagrammatised. The ES should also include specific details regarding the proposed delivery to and servicing of the Proposed Development (e.g. the location and capacity of loading facilities for deliveries, and the anticipated increases in Light Goods Vehicles (LGVs)) so that the relevant assessment can be provided and effects identified, where necessary.	The servicing strategy has been discussed with LBTH highways on several occasions and will be set out in full as part of the Transport Assessment and Delivery Servicing Plan. The EIA is not the appropriate place for this data to be repeated as it needs to be produced in line with national DMRB and IEMA guidelines.
	LBTH considers a commitment to using electric (or alternative technology) vehicles for servicing and delivery associated with the development should be made as part of the planning application, to be secured via s106 or condition.	The proposals will enable EV delivery and servicing through the provision of EV rapid charging and cargo cycle facilities. However, as deliveries, especially those to individual residents of the site such as grocery or parcel deliveries, are mostly outside of the developer's control a condition such as this is not deemed appropriate.
	Cumulative impacts will be an important consideration	An estimate of construction vehicle flows for nearby development will be included as part of the ES based on publicly available construction flows for those developments. It is noted that as the future year modelling is based on growth of existing traffic and existing traffic already includes some construction flows for construction around the area, some cumulative construction traffic will be inherent to the assessment.
	The ES and TA should include a multi-modal impact assessment.	The TA includes a multi-modal trip generation and capacity impact assessment, while the ES uses the vehicle trip generation from the TA to establish environmental effects as set out in DMRB LA104 and the 1993 GEART.
4.9 Wind Microclimate		
4.9.2 General Comments	Given the height of the Proposed Development, the assessment should consider wind speeds at elevated levels of the Proposed Development, as stated in Paragraph 332 of the Scoping Report. For the avoidance of doubt the assessment is to assess the wind microclimate to be experienced on any balconies, open space and roof terraces as appropriate, including those provided within the Proposed Development, as well as within surrounding buildings as required. The Applicant should review whether any such spaces are within the study area for assessment, and this should be confirmed in the ES.	<p>An assessment of the wind microclimate at all amenity space (including open space, rooftops and balconies) within the Proposed Development has been undertaken as appropriate. Elevated amenity levels of surrounding buildings have been included for sites in very close proximity to the Proposed Development. In the majority of cases, introduction of building massing would be anticipated to provide shelter to the surroundings, which is particularly applicable to elevated spaces which tend to be otherwise very exposed.</p> <p>RWDI have reviewed potential impacts to off-site balconies and the figure below shows the ones that are relevant from a Wind point of view are highlighted below:</p>

		
4.9.3	<p>As stated in Paragraph 335 of the Scoping Report, effects during demolition and construction are to be assessed using professional judgement (qualitatively) within the ES, which is considered acceptable. For the avoidance of doubt, the ES should provide assessment of wind effects during construction utilising the worst-case scenario, such as with cranes in situ. It should be clear where professional judgement has been applied.</p>	<p>Any others are unlikely to be affected by the development as they are too far away.</p> <p>Noted, however, the demolition and construction milestone of “with cranes in situ” may not reflect the worst-case scenario for a specific site. Appropriate judgements have been applied.</p>
4.9.4	<p>LBTH consider that City of London (CoL) Microclimate Guidelines (August 2019), should inform the assessment methodology given the location of the Application Site is adjacent to in a significant growth area (as per the site allocation in Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020)). However, it is not considered that Annex A of the CoL Microclimate Guidelines can be applied to LBTH as the guidelines confirm these parameters have been scaled specifically for CoL. LBTH consider that any dining areas should meet the City Lawson Criteria for frequent sitting i.e. 2.5m/s.</p> <p>LBTH expects an initial assessment of the Proposed Development should be undertaken using Computational Fluid Dynamics (CFD), and that the results of the CDF analysis contribute to the design of the Proposed Development and/or the mitigation measures which may be required to achieve suitable conditions for the proposed uses on-site. LBTH expects wind tunnel testing will then be undertaken on the final scheme to inform the wind microclimate aspect chapter.</p> <p>Wind tunnel testing will be undertaken to assess wind conditions at various receptors' location and the suitability of the intended uses. Scenarios to be tested are:</p> <ul style="list-style-type: none"> • Baseline (Existing Application Site + Existing Surrounding Context); • Proposed Development (detailed element only) + Existing Surrounding Context; • Proposed Development (detailed and outline elements) + Existing Surrounding Context; • Proposed Development (detailed and outline elements + Future Surrounding Context (cumulative schemes); and 	<p>The CoL WMG, including the criteria that are applied are derived specifically for the street-scape and uses of public realm within the City of London. This may be applicable to a certain extent in areas of LBTH such as Canary Wharf (i.e., predominantly office uses with small street patterns), however the Aberfeldy Estate has a very different environment. It is considered that the standard LDDC variant of the Lawson Comfort criteria, which already contains an appropriate threshold criteria for sitting use should be utilized.</p> <p>From a technical perspective, a number of the minimum technical requirements of the CoL guidelines are already considered in RWDI's wind tunnel methodology.</p> <p>Initial CFD was not undertaken, however early wind tunnel studies were undertaken to inform the massing design.</p> <p>The wind assessment has been undertaken based on the agreed configurations and also an assessment of the illustrative scheme to provide comfort on the outline maximum parameters assessment. Further explanation of this approach is presented within ES Volume 1, Chapter 2: Methodology.</p>

	<ul style="list-style-type: none"> • Future Baseline (Existing Application Site + Future Surrounding Context). 	
	<p>If mitigation measures are required to ensure wind conditions are suitable for their intended use, wind tunnel testing of these measures is to be undertaken and any results provided in the ES. The ES should set out exactly what measures are required for mitigation and how these will be secured. It must be ensured that all mitigation measures and landscaping proposed and tested in the wind microclimate aspect chapter are proposed within the landscaping strategy, as there are often discrepancies where required mitigation measures are not brought forward in other planning application documents.</p>	<p>Mitigation principles and/or broad strategies could be proven against the illustrative scheme, however it remains the case that details associated with the scheme geometry and specific target uses across the site would be subject to change to be determined at reserved matters stages. Where required the detailed elements of the Proposed Development will be mitigated.</p>
	<p>The ES should consider whether future monitoring is required to test actual conditions of the Proposed Development.</p>	<p>Monitoring is typically only conducted on localised areas where anecdotally, wind issues or adverse effects on the environment associated with wind have been witnessed. It is impractical to conduct monitoring over large areas, where pedestrians and/or vehicles would be frequent also. Wind assessments are conducted utilising a significant period of statistical wind data also, therefore the timelines associated with monitoring to gather appropriate data could be extensive. Fortunately, with robust wind assessments having been conducted such manifestations of adverse wind effects are very rare, and typically occur on schemes where no assessment was originally carried out prior to its construction. It is therefore not anticipated that any monitoring would be required.</p>
	<p>A study area covering a 450 m radius from the centre of the Application Site will be used, which LBTH considers to be acceptable.</p> <p>The following plans should be included in the ES:</p> <ul style="list-style-type: none"> • The intended uses of the Application Site (e.g. the open spaces, thoroughfares, entrances); • What conditions are being targeted (e.g. open space should be suitable for sitting); and • The mitigation measures relied upon. <p>This allows the reader to understand the basis of the assessment and provides the opportunity to contest the uses and anticipated wind categories. For the avoidance of doubt, results are to be presented for both the windiest season, and summer season.</p>	<p>Figures of the intended uses of the Proposed Development have been included within the ES for the outline elements (based on the illustrative scheme) and the detailed elements in particular, including seasonal considerations where applicable. Target criteria forms part of the methodology and discussion sections of the accompanying reporting. The mitigation measures to be relied upon have been clearly outlined within the ES Volume 1, Chapter 13: Wind Microclimate, notwithstanding the previously mentioned approach with regards to the maximum parameters.</p>
	<p>Any spaces that are proposed as part of the Proposed Development, and that are relied upon by the Applicant to provide amenity, should have wind conditions suitable for this use.</p>	<p>Amenity spaces within the Proposed Development have been assessed as part of the wind microclimate assessment, with a focus upon summer season conditions when these spaces are to be most frequently used. For these areas, a mixture of standing and sitting conditions is considered appropriate in more open amenity spaces, and for private balconies, standing is appropriate where no seating is provided. In all cases, these uses must be considered safe with no exceedances annually of the distress criteria for all seasons. Where seating is specifically provided, conditions suitable for sitting (during the summer season) will be sought.</p>
	<p>The assessment should demonstrate how climate change has been considered within the Wind Microclimate aspect chapter of the ES, noting that the UK Climate Projections 2018 (UKCP18) states “an increase in near surface wind speeds over the UK for the second half of the 21st century for the winter season [is predicted] when more significant impacts of wind are experienced. This is accompanied by an increase in frequency of winter storms over the UK” Whilst it is acknowledged that “the increase in wind speeds is modest compared to interannual variability for the PPE-15”, more extreme wind conditions are predicted overall.</p>	<p>In combination climate change effects are presented in ES Volume 1, Chapter 9: Climate Change. It is worth noting that the data used within the analysis does statistically identify trends over the period for when the data is collected. As such, consideration of these trends are inherently included within the wind microclimate assessment included within the ES. UKCP18 and not UKCP09, informs the climate change scenario, as noted.</p>
<p>4.11 Built Heritage</p>		
	<p>The Scoping Report includes a list of the heritage assets most directly affected by the Proposed Development within Paragraph 371 and 372 of the Scoping Report and shown within Figure 10, noting that all heritage assets to be assessed are yet to be agreed with LBTH. LBTH consider that a zone of visual influence is provided to inform the heritage assets to be scoped into the assessment. However, from an initial consideration it is considered that the following should also be assessed:</p> <ul style="list-style-type: none"> • Maritime Greenwich World Heritage Site and Scheduled Monument; • Three Mills Conservation Area; • Limehouse Cut Conservation Area; • Lansbury Conservation Area; • Naval Row Conservation Area; 	<p>Annex 6 of the ES Volume 2, Townscape Visual Impact Assessment and Built Heritage Assessment – Part 1 presents the Zone of Theoretical Visibility (ZTV), which has been used to establish heritage assets with the potential to be directly affected by the Proposed Development. The full list of heritage assets assessed within the ES are presented within ES Volume 2, Townscape Visual Impact Assessment and Built Heritage Assessment - Part 2</p>

	<ul style="list-style-type: none"> • All Saints Church Conservation Area; • Northern portal and parapet to the Blackwall Tunnel (Grade II); • East India Dock Wall and Gateway (Grade II); • Poplar Baths (Grade II); • Statue of Richard Green (Grade II); • Church of St Saviours (Grade II); • Twelvvetrees Crescent Bridge (Grade II); • Group of Gasholders former Bromley-by-Bow gasworks (Grade II); • Northern Ventilation Shaft to the Blackwall Tunnel (Grade II); • Dry Dock at Blackwall Engineering (Grade II); • Blackwall Pier (Grade II); • Trinity House (Grade II); • Royal Oak Public House (Grade II); • 162 St Leonards Road Locally listed building; • 159-167 St Leonards Road locally listed buildings; • Dowgate Wharf, 22 Gillender Street (Grade II) and 21-22 Gillender Street locally listed buildings • 18 Follet Street locally listed building; • Mission House locally listed building; • St Freideswide Halls locally listed building; and • Heritage assets within the identified Conservation Areas

Table 3: EIA Scoping – Topics Scoped Out

5.1 Ecology and Biodiversity		
5.1	<p>LBTH notes that the Preliminary Ecological Appraisal (PEA) (presented in Appendix E of the Scoping Report and upon which the above justification is based) was undertaken for a site area of 7.35 ha, rather than the 9.69 ha area of the Application Site, with the main section of the Application Site not having been included within the PEA being Jolly's Green. LBTH considers that whilst the wildlife habitat of Jolly's Green is unknown, it is by far the most biodiverse area within the Application Site boundary and the Applicant should note that there have been several recent biodiversity enhancement projects at Jolly's Green, led by Trees for Cities, working with the local community. LBTH considers that the Applicant should update the PEA with the correct Application Site boundary, to enable LBTH to successfully consider whether an Ecology and Biodiversity aspect chapter can be scoped out of the ES. Noting that the Scoping Report does not confirm whether the areas of open space within the Application Site are to be retained as part of the Proposed Development. LBTH therefore, requires an Ecology and Biodiversity aspect chapter to be scoped into the ES, unless the Applicant can provide the updated PEA including Jolly's green and further details regarding the proposals for the areas of open spaces to demonstrate likely significant effects are not likely to occur.</p>	<p>The PEA submitted alongside the scoping report did not include the final application site boundary. As the existing Jolly's Green open space is not included within the application site / red line boundary and the existing open spaces are to be improved, it is considered that there is no requirement for this aspect to be included within the ES. The Proposed Development is unlikely to result in significant effects. An updated PEA which reflects the final red line Site boundary has been prepared and is submitted in support of the planning application.</p>
	<p>The Proposed Development has the potential to enhance biodiversity and achieve biodiversity net gain through biodiverse roofs and other biodiversity enhancements, which will be required in accordance with the relevant planning policy. A Biodiversity Net Gain assessment is to be undertaken. Ecological enhancements should contribute to the local biodiversity action plan (LBAP).</p>	<p>The Biodiversity Net Gain Assessment has been prepared for the Site and accompanies the Planning Application.</p>
5.3 Geoenvironmental (ground conditions, groundwater, land take and soils)		
	<p>For the Proposed Development, key mitigation and management controls should form part of a CEMP for the demolition and construction works and it is noted that the Applicant states in Paragraph 217 of the Scoping Report that this would be prepared in advance of any works commencing on-site. This should be presented in the ES to help define the policies, procedures, and management framework for the implementation of any identified specific geoenvironmental management and mitigation controls and monitoring.</p>	<p>An Outline CEMP is appended to the ES within ES Volume 3, Appendix: Demolition and Construction – Annex 1.</p>
5.5 Project Vulnerability		
	<p>LBTH does not agree to scope out major accidents and disasters from the ES and that relevant risks of accidents and disasters, such as those referred to above, are to be assessed within the ES. However, it is considered that a standalone major accidents and disaster aspect chapter is not required given the nature and context of the Proposed Development and noting the Health and Safety Executive's consultation response confirms the Application Site does not lie within the consultation distance of a major hazard site or major accident hazard pipeline.</p>	<p>A review of the IEMA guidance (2020) 'Major Accidents and Disasters in EIA: A Primer has been undertaken, and the approach which was followed in the EIA Scoping Report is considered to align with this new guidance. As per the guidance, the Proposed Development has been screened to determine its potential to result in likely significant effects from major accidents and natural disasters. It is considered the Proposed Development would be unlikely to result in significant effects from most major accidents and natural disasters. The potential for strong winds is considered within ES Volume 1, Chapter 11: Wind Microclimate and any potential for Solar Glare is considered within ES Volume 1, Chapter 10: Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare as relevant)</p>
5.7 Waste		
5.7	<p>"... the Applicant is reminded that IEMA's Guide to: Materials and Waste in Environmental Impact Assessment considers materials to be a sensitive receptor, in addition to landfill capacity. Given that the Scoping Report does not consider materials, unless the Applicant can adequately justify that no likely significant effects will occur on materials during the demolition and construction of the Proposed Development, and once the Proposed Development is operational, LBTH considers that a Materials assessment and aspect chapter should be scoped into the ES.</p>	<p>Further justification on this point is therefore provided below:</p> <p>Demolition and Construction: During demolition and construction, it is anticipated that materials for constructing the Proposed Development will be sourced from the Site, in terms of any 'waste for recovery'¹ and within the LBTH and London.</p> <p>In accordance with IEMA's guide to Materials and Waste in Environmental Impact Assessment², materials are considered to be sensitive receptors and include "physical resources that are used across the lifecycle of a development. Examples include concrete, aggregate, asphalt, bricks, ballast, mortar, glass and timber."</p> <p>Mitigation: IEMA's guide to Materials and Waste in Environmental Impact Assessment refers to different types of mitigation measures to prevent or reduce adverse effects relating to materials and waste:</p> <ul style="list-style-type: none"> Primary mitigation measures: are "an intrinsic part of the development, and do not require additional action to be taken"³; for example, choosing to refurbish an existing building, rather than demolish it;

¹ Defined by IEMA's guide to Materials and Waste in Environmental Impact Assessment (2020) as 'waste' materials that go through an acceptable recovery process, to lose their status as 'waste' and become materials for other uses.

² IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment.

³ IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 19).

		<ul style="list-style-type: none"> • Secondary mitigation measures: are “foreseeable actions brought out by the environmental assessment process, and that have not previously been achieved through primary and tertiary mechanisms”⁴; for example, the implementation of a Procurements Strategy or Construction Environmental Management Plan (CEMP) (or equivalent) or Operational Waste Management Strategy; and • Tertiary mitigation measures: are “those that are in place with or without the iterative EIA process” and include “those that will be undertaken to meet existing legislative requirements, of those that are considered standard practices used to manage commonly occurring environmental effects”⁵; for example, sending waste to active and permitted waste management sites, which have to adhere to the requirements of the Environmental Permitting Regulations⁶, whereby carrying out certain types of activity (such as receiving waste for landfill) requires an active and permitted waste management site to hold an environmental permit to do so. <p>In view of the above, measures will be implemented to reduce the quantity of materials used during the construction of the Proposed Development. The key construction materials will be:</p> <ul style="list-style-type: none"> • Recovered from off-site sources (e.g. donor sites) as far as reasonably practicable; • Sourced locally as far as reasonably practicable; • Sourced in accordance with The Green Guide to Specification⁷ to reduce the environmental impact of the construction of the Proposed Development by an informed and responsible selection of construction materials and components (for example, for the floors, roofs, walls, windows, insulation and landscaping of the Proposed Development); • Reclaimed or recycled materials, where feasible; • Sourced via a defined Procurement Strategy, which will select materials with a percentage of recyclable content where feasible; • Managed via the implementation of a CEMP (or equivalent), which will include measures such as: • A ‘just-in-time’ material delivery system to avoid materials being stockpiled and spoiled during bad weather; • Consideration of material quantity requirement to avoid over-ordering and generation of waste materials; and • Designated storage area for new building materials, to reduce the risk of damage / spoiling. <ul style="list-style-type: none"> – Measures such as the above shall be implemented pursuant to planning conditions; therefore, it is considered that significant adverse effects of the demolition and construction of the Proposed Development on materials would be unlikely. <p>On the basis of the above, an assessment of demolition and construction effects on materials is scoped out; however, the ES sets out:</p> <ul style="list-style-type: none"> • The approximate type and quantities / volumes of materials that are anticipated to be required for the construction of the Proposed Development; • The sustainability credentials of materials (if known); and • The commitment to undertaking the measures outlined above. <p>Any necessary mitigation measures relating to the above points are included in ES Volume 1, Chapter 17: Mitigation and Monitoring. These measures could be secured through a condition by the LBTH.</p>
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⁴ IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 27).

⁵ IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 20).

⁶ The Environmental Permitting (England and Wales) Regulations 2016

⁷ BRE, (2009); The Green Guide to Specification, Fourth Edition.