

Chapter 2: EIA Methodology

INTRODUCTION

- 2.1 This chapter of the ES sets out the overall approach to, and methodology for, undertaking the EIA. It details the process for identifying the environmental issues (or ‘topics’) to be included in the EIA and the method of assessing the likely significant effects that have the potential to arise as a result of the Proposed Development, both during the demolition and construction works, and on completion and occupation of the Proposed Development.
- 2.2 Further detail on how the assessment methodology is applied to each topic is presented within the respective technical chapters of this **ES Volume 1, Chapters: 6 - 14.**

OVERVIEW OF THE PLANNING APPLICATION

Form of the Planning Application

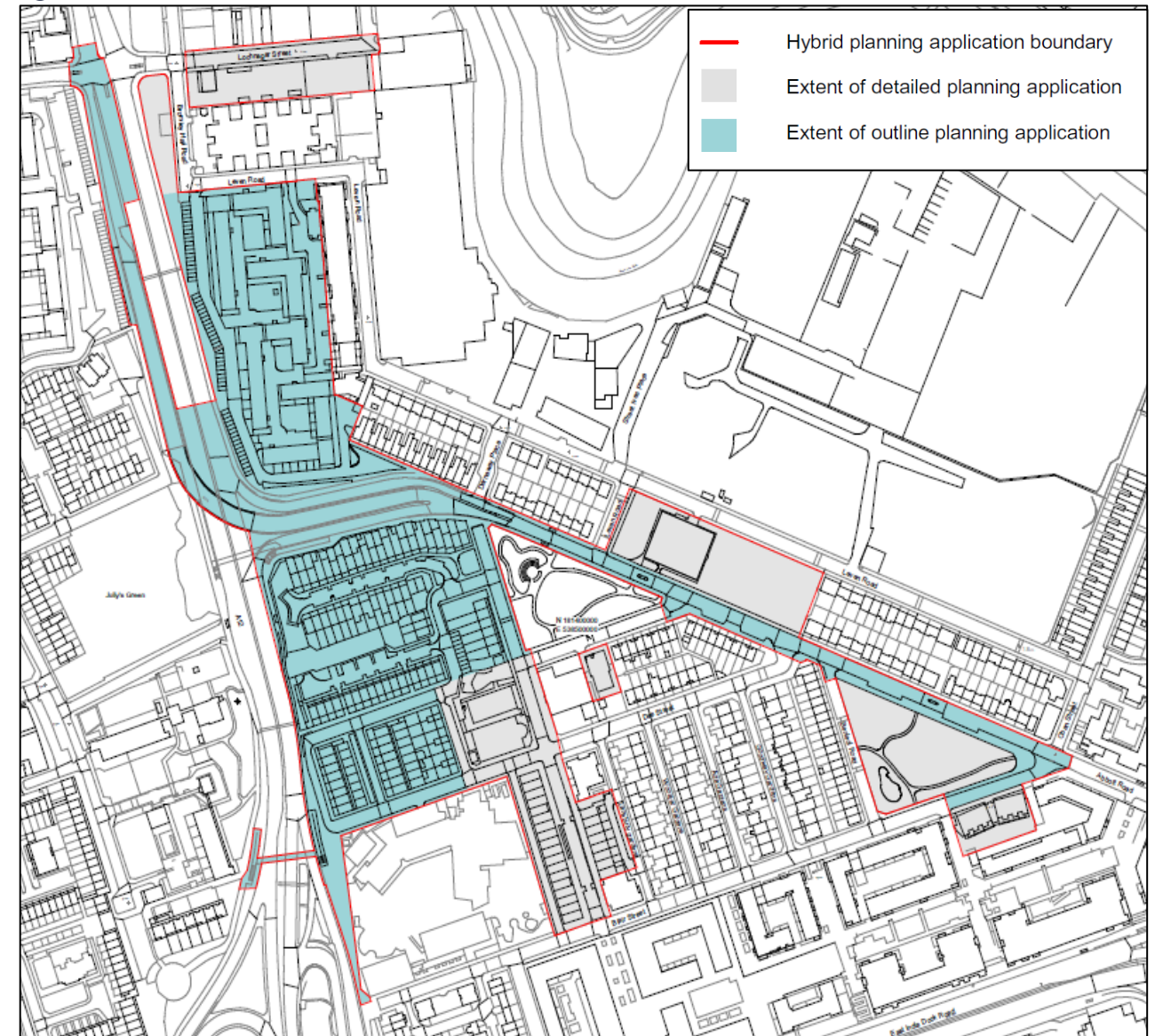
- 2.3 The Applicant is seeking permission for a Proposed Development that includes both outline and detailed Proposals. As such, the level of detail submitted as part of the planning application relating to each element of the Proposed Development varies.
- 2.4 The Proposed Development will be delivered across four phases; Phase A, B, C and D. Phase A involves demolition of all existing structures and comprises the detailed element of the Proposed Development (the ‘Detailed Proposals’), and Phases B, C and D forms the outline element of the planning application (the ‘Outline Proposals’). The boundaries of the Phases are illustrated on **Figure 2.1**. Refer to **ES Volume 1, Chapter 5: Demolition and Construction** for the Demolition Plan.
- 2.5 The Outline Proposals of the planning application reserve all matters for later approval by the LBTH through the submission of reserved matters applications (RMAs’).
- 2.6 The Town and Country (Development Management Procedure) (England) Order 2015 (‘DMPO’) sets out requirements and guidance for outline planning applications. In accordance with the DMPO, the following matters are reserved for later approval for the Outline Proposals:

- **Amount of Development** – The specifics in terms of exact amount of floorspace for each land use sought for approval is not provided at this stage. Instead, a defined maximum land use quantum proposed within allocated land parcels for each Use Class is provided. As further described within **ES Volume 1, Chapter 4: The Proposed Development**, the specific amount of development is set out for each land use class for the Detailed Proposals and specifies an ‘up to maximum’ amount of development for each land use class proposed for the Outline proposals. The Development Specification sets out the Land Use Quantum and Land Use Distribution across the Site;
- **Layout** – As defined in the DMPO “the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other” is reserved. Although reserved, the planning application seeks outline approval of parameters associated with the layout of the land uses and associated key open spaces and routes as set out in the Parameter Plans;
- **Scale** – As defined in the DMPO “the height, width and length of each building in relation to their surroundings” is reserved. However, in compliance with the DMPO, the planning application seeks approval for the maximum scale of the buildings from existing ground levels as shown on Parameter Plans;
- **Appearance** – As defined in the DMPO “the aspects of a building or place within the development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture” are reserved. However, the planning application seeks approval for a set of guiding design parameters through the Design Code, which will guide the detailed design and establish principles and/ or a framework in relation to the appearance of the buildings which are to be applied for at a reserved matters stage;
- **Landscaping** – As defined in the DMPO “the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes— (a) screening by fences, walls or other means; (b) the planting of trees, hedges, shrubs or grass; (c) the formation of banks, terraces or other earthworks; (d) the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and (e) the provision of other amenity features” is reserved. An illustrative

landscape masterplan is also submitted with the planning application which illustrates how the development may come forward in the future in terms of open space and landscaping. The illustrative masterplan is used for informative purposes only and is not used as the basis of assessment within the EIA; and

- **Access** – As defined in the DMPO “means the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network” is reserved. Primary, Secondary and Tertiary Routes (Pedestrian / Cyclist) within the site and Vehicle and Pedestrian Site Access locations to the site are defined for the Outline Proposals within the Parameter Plans.
- 2.7 The Outline Proposals of the planning application provide the Applicant with flexibility as to the uses that could be brought forward within this element of the Site. The Detailed Proposals of the planning application are seeking approval for detailed plans showing the layout, scale, appearance, landscape, access and a quantum of development.
- 2.8 An Illustrative Masterplan, inclusive of landscape character, has also been prepared to alongside the planning application. The Illustrative Masterplan encompasses the Detailed Proposals of the Proposed Development in combination with a deliverable scheme that could come forward within the parameters sought for approval in the Outline Proposals.
- 2.9 Further details of the Proposed Development sought for approval and assessed within this ES are presented within **ES Volume 1, Chapter 4: The Proposed Development.**

Figure 2.1 The Proposed Development Phase A (Detailed Proposals - Grey) Phases B, C AND D



Basis of Assessment

2.10 The assessments contained within each of the technical assessments (**ES Volume 1, Chapters 6 to 14 and in ES Volume 2**) are based on the Proposed Development sought for approval as illustrated on the Parameter Plans, Development Specification and Design Codes for the Outline Proposals and the detailed plans and Area and Accommodation Schedule sought for approval for the Detailed Proposals. The information assessed differs in each technical discipline but is set out clearly in each chapter.

Assessment of the Outline Proposals in the EIA – Phases B, C and D

2.11 The outline planning application includes a set of control documents which describe the principal components of the Outline Proposals of the Proposed Development, provide parameters that guide future RMAs, and act as controls to limit development within the parameters set. These documents set out the information required to allow the impacts of the outline proposals of the Proposed Development to be identified and assessed with sufficient certainty.

2.12 The Control Documents that comprise the Outline proposals and for which outline planning permission is sought are as follows:

- **Development Specification** – a document which defines and describes the principal components of the Proposed Development, including the form and content of the outline planning application as well as the parameters for future RMA's. The Development Specification outlines the maximum amount of development that could come forward across the site; land use quantum (maximum areas per non-residential Use Class) and distribution for both residential and non-residential uses, open space provision, access arrangements, building heights and density across the Proposed Development. The Development Specification includes the maximum number of residential units within the Outline Proposals and an indicative residential unit type and tenure mix based on the site wide affordable housing provision, illustrative masterplan and policy requirements. Land Use Classes which could be brought forward in each plot has also been specified, including potential flexibility for which uses come forward for each plot.
- **Parameter Plans** – present outline parameters associated with the scale, layout, uses, and access for the Proposed Development, comprising:

Parameter Plan	Drawing Reference
Site Location Plan	3663 - LB - ZZ - 00 - DR - A - 000001
Existing Site Plan	3664 - LB - ZZ - 00 - DR - A - 000002
Existing Buildings Plan	3665 - LB - ZZ - ZZ - DR - A - 000003
Existing Site Levels	3666 - LB - ZZ - 00 - DR - A - 000004
Existing Site Sections	3667 - LB - ZZ - XX - DS - A - 000005
Demolition Plan	3663 - LB - ZZ - 00 - DR - A - 000010
Indicative Construction Phasing	3663 - LB - ZZ - 00 - DR - A - 000011
Parameter Plan - Outline and Full Application Areas	3663 - LB - ZZ - 00 - DR - A - 000020
Parameter Plan - Building Plots	3663 - LB - ZZ - 00 - DR - A - 000021
Parameter Plan - Proposed Site Levels – Lower Ground Floor	3663 - LB - ZZ - 00 - DR - A - 000022
Parameter Plan - Proposed Site Levels – Basement Level	3663 - LB - ZZ - B1 - DR - A - 000023
Parameter Plan – Principal Public Realm Areas	3663 - LB - ZZ - 00 - DR - A - 000024
Parameter Plan – Access and Circulation	3663 - LB - ZZ - 00 - DR - A - 000025
Parameter Plan – Land Use Basement	3663 - LB - ZZ - 00 - DR - A - 000026
Parameter Plan – Land Use – Lower Ground Floor	3663 - LB - ZZ - 00 - DR - A - 000027
Parameter Plan - Land Use - Upper Ground Floor	3663 - LB - ZZ - 00 - DR - A - 000028
Parameter Plan - Land Use - First Floor	3663 - LB - ZZ - 00 - DR - A - 000029
Parameter Plan - Land Use – Upper Floors	3663 - LB - ZZ - 00 - DR - A - 000030
Parameter Plan – Building Heights	3663 - LB - ZZ - 00 - DR - A - 000031
Parameter Sections 01	3663 - LB - ZZ - 00 - DR - A - 000040

Parameter Sections 01	3663 - LB - ZZ - 00 - DR - A - 000041
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2.13 Design Code – provides a design framework to secure the vision, character and quality of the detailed design which will be sought for approval through subsequent RMA's. The Design Codes define a set of 'rules' that need to be applied to the detailed design of the Outline Proposals. Some of the guidelines within the Design Code are mandatory and will be followed in future RMAs, providing certainty with regards to the quality and character of the Proposed Development. Other guidelines (recommended) have a degree of flexibility so that alternative design solutions can be arrived at where they result in a high-quality outcome. Recommended guidelines can be expressed as preferable or optional. The planning application is submitted alongside an architectural Design Code prepared by the project architects. The Design Codes further refine the Parameter Plans and define the final form of the Proposed Development. The Design Codes have also been informed by the findings of the environmental assessment work –specifically, the EIA has identified likely **significant adverse effects** in respect of Air Quality, Noise and Vibration, Climate Change, Wind Microclimate, Daylight, Sunlight, Overshadowing and Townscape and Visual Impact Assessment. As such, mitigation measures in respect of these technical topics have been defined and are presented within the ES and Design Codes. This is to ensure that the detailed design incorporates the required measures to render any residual effects relating to these topics insignificant. Further detail is provided in **ES Volume 1, Chapter 3: Alternatives and Design Evolution** and **Chapter 4: The Proposed Development** as well as the technical chapters of this ES (**ES Volume 1, Chapter 6 - 14 and ES Volume 2**).

2.14 The Development Specification, Parameter Plans, and Design Codes set out the information required to allow the environmental and socio-economic impacts and effects of the Proposed Development to be identified with sufficient certainty for the Outline Proposals.

Maximum Scale of Development

2.15 As defined by the Development Specification, the planning application seeks approval for both residential and non-residential land uses across both components (outline and detailed plots) of the Proposed Development.

2.16 The massing related technical studies of the EIA (wind microclimate, daylight, sunlight, overshadowing, and (built) heritage, townscape and visual) provide an assessment of the likely environmental effects of the maximum scale and layout parameters sought for approval, as per the Parameter Plans and taking into consideration any controls specified within the Design Codes and as presented in a 3D massing model.

2.17 The maximum scale and layout parameters reflect the maximum built form of development being sought for approval across the Outline Proposals of the site where design parameters are applicable. The maximum (rather than the minimum) built form is the most likely development massing configuration for the Proposed Development. The likely environmental effects of the Proposed Development have been defined on the basis of the maximum built form of development as per the maximum scale and layout parameters for the Outline Proposals.

Illustrative Masterplan

2.18 An Illustrative Masterplan has also been included within the DAS, which exemplifies one way in which future development could come forward in accordance with the Parameter Plans and Design Code, for the Outline Element of the Proposed Development.

2.19 An assessment of the Illustrative Masterplan is not required with respect to the EIA as it shows only one way in which the Proposed Development could come forward, rather than being subject to the permission that is being sought (i.e., the maximum parameters).

2.20 However, for some technical assessments it is appropriate to also consider the Illustrative Masterplan. The Outline Parameters representing the maximum quantum have been assessed alongside the Illustrative Masterplan in the Wind Microclimate assessment, presented in **ES Volume 1: Chapter 13: Wind Microclimate**, and the Daylight, Sunlight and Overshadowing assessment presented in **ES Volume 1: Chapter 14: Daylight, Sunlight and Overshadowing**, to demonstrate that acceptable conditions in relation to these topics can be achieved in a scheme within the maximum outline parameters sought for approval, albeit the assessment of impacts and classification of effects are based on the Outline Proposals and Detailed Proposals.

2.21 The assessments undertaken of the Illustrative Masterplan do not form the main assessment in the EIA and are instead supplementary to the assessment of the parameters, provided purely for informative purposes for the LBE. The methodology for each respective assessment is provided within the relevant ES Chapter.

2.22 In addition, the socio-economic assessment applies the breakdown in the residential and non-residential units of the Illustrative Masterplan to allow a reasonable level of assessment to be undertaken. This is explained further below.

Quantum of Development

2.23 As defined by the Development Specification, the planning application seeks approval for both residential and non-residential land uses across the Proposed Development as a whole.

2.24 As such, the EIA has determined appropriate assessment scenarios that have been applied for the technical assessments which consider use classes and floorspace quantum, on a topic-by-topic basis, to ensure that a reasonable worst-case assessment is being undertaken and the likely significant environmental effects are identified and addressed.

2.25 In terms of traffic and transport (and the road traffic noise and air quality assessments), the EIA assesses the maximum amount of development across the entire Proposed Development and across the mix of uses sought for approval as a reasonable worst-case scenario. In terms of traffic and transport related effects, the upper limits on the amount of development sought for approval represents the worst case, as a greater amount of floorspace or number of residential units for example leads to a higher trip generation. Where flexible uses are proposed (i.e., the Use Class E, Use Class E (g)(i)) the use class which would generate the greatest number of trips has been used to define traffic and transport, air quality and noise effects.

2.26 In terms of socio-economics, the EIA also assesses the maximum amount of development across the entire Proposed Development and across the mix of uses sought for approval. However, the maximum quantum of development does not represent a reasonable worst case in relation to non-residential land uses which generate employment. Therefore, a minimum quantum of development for non-residential land uses which would generate employment has been defined within the Development Specification. Therefore, the EIA assesses the minimum amount of development for the employment in terms of the smallest area permissible as well as the least employment generating uses as a reasonable worst case. These areas are defined in **ES Volume 1, Chapter 6: Socio-Economics**.

2.27 In respect of the residential uses sought for approval across the outline component of the planning application, the socio-economics assessment assesses the land uses and floorspace areas as defined within the Development Specification that would generate the reasonable worst-case effects. When assessing the effects of the Proposed Development on social infrastructure, the majority of the assessments use the maximum unit number sought for approval, as a worst case to calculate the maximum population yields, applying the Illustrative Masterplan's unit and tenure mix as a reasonable assumption.

2.28 The potential effects where the maximum residential unit number is considered are the following:

- Demand for primary healthcare;
- Demand for primary school education;
- Demand for secondary school education; and
- Open space and play space.

2.29 The potential effects where the minimum residential unit number (Illustrative Masterplan's as presented within **ES Volume 1, Chapter 4: The Proposed Development**) is considered to understand the worse-case scenario are the following:

- Housing provision; and
- Residential expenditure.

Assessment of the Detailed Components of the Planning Application in the EIA – Detailed Proposals

2.30 The Detailed Proposals of the Planning Application (Phase A) is accompanied by a full set of detailed planning drawings including Demolition Plans; General Arrangement Plans, Site Sections, Façade drawings and Elevations of the various elements of the Detailed Proposals. It is also accompanied by Landscape drawings which include Ground Level, Podium Level and Roof Level General Arrangement Plans as well as a site wide Illustrative Landscape Masterplan. The Detailed Proposals of the Planning Application is also accompanied by

an Area Schedule which defines the fixed floorspace areas for the various land Use Classes proposed within Phase A, and an Accommodation Schedule with a total unit number and a proposed residential unit mix and tenure type. The EIA uses this information as the basis of assessment for the Detailed Proposals.

Assessment of Demolition and Construction

2.31 As the Proposed Development is phased, assessment scenarios have been considered within **ES Volume 1, Chapter 7: Traffic and Transport, Chapter 8: Air Quality, Chapter 10: Noise and Vibration, Chapter 13 Wind Microclimate and Chapter 14: Daylight Sunlight and Overshadowing** to determine any potential effects during periods of the construction of the Proposed Developments (such as peak period of construction activities associated with the construction of Phase A). Further information in regard to the phased delivery of the Proposed Development is defined within **ES Volume 1, Chapter 5: Demolition and Construction**.

2.32 The above chapters have considered the following assessment scenarios:

- Potential effects as result of demolition and construction activities;
- Potential effects as a result of a peak period of construction activities which coincide with the occupation of the Detailed Proposals whilst the Outline Proposals are still under construction (Year 4);
 - The Proposed Development is phased with Phase A (applied for in detail) to be constructed first and first occupation of the first buildings within Phase A will occur whilst construction activities for Phase B-D are underway. Therefore, an assessment of this period within the construction program has been considered where relevant for each technical assessment. This assessment scenario considers if any introduced sensitive receptors will experience potentially adverse effects as a result of ongoing construction activity across the Site. Given the uncertainty regarding the Outline Proposals this approach has been undertaken to capture the likely significant effects in relation to transport, air quality, noise and vibration and socio-economics.
 - The wind microclimate assessment considers the likely environmental effects of the Detailed Proposals (Phase A) as well as maximum scale and layout parameters sought for approval, as per the Parameter Plans and taking into consideration any controls specified within the Design Codes and as presented in a 3D massing model.
- Potential effects as a result of the fully complete and operational Proposed Development; and
- Potential cumulative effects as a result the Proposed Development and any defined cumulative schemes.

2.33 Further details in regard to each assessment scenario is described within each technical ES chapter.

EIA GUIDANCE AND POLICY

EIA Guidance

2.34 The EIA has been prepared in accordance with applicable legislation, guidance, and case law for the preparation of such documents. Specifically, this ES has been undertaken in accordance with the Institute of Environmental Management and Assessment (IEMA) Quality Mark indicator checklist and with due consideration to the following:

- At a European level, reference has been made to the European Commission's (EC) various EIA guidance documents available here: <http://ec.europa.eu/environment/eia/eia-support.html> ;
- At a domestic level, reference has been made to the Ministry of Housing for Communities and Local Government's overarching Planning Practice Guidance¹;
- In addition, the Department for Transport "Design Manual for Roads and Bridges, Sustainability and Environment²" has been referred to as applicable;
- In relation to publications from professional bodies, reference has been made to the IEMA publications as these include best practice/suggested improvements to the EIA process. This includes:

¹ <http://www.gov.uk/guidance/environmental-impact-assessment>

² Highways England, 2020. Design Manual for Roads and Bridges 'Sustainability and Environment' – LA104 Environmental assessment and monitoring.

- IEMA ES Review Criteria (COM3-6)³;
- IEMA 'Guidelines for Environmental Impact Assessment' (2004)⁴;
- IEMA 'Special Report into the State Environmental Impact Assessment Practice in the UK' (2011)⁵;
- IEMA 'Shaping Better Quality Development' (2015)⁶;
- IEMA 'Delivering Better Quality Development' (2016)⁷;
- IEMA 'Delivering Proportionate EIA' (2017)⁸;
- IEMA 'Materials and Waste in EIA' (2020)⁹;
- IEMA 'Major Accidents and Disasters in EIA: A Primer' (2020)¹⁰;
- IEMA 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (2017)¹¹; and
- IEMA 'Environmental Assessment of Road Traffic' (1993)¹².

2.35 Whilst primarily written for major infrastructure projects, reference is also made to guidance/advice notes published by the Planning Inspectorate in relation to National Infrastructure Planning¹³ where appropriate, as these can include relevant/helpful information.

Planning Policy

2.36 The EIA has considered relevant national, regional, and local planning policy and guidance as summarised below.

National Planning Policy and Guidance

2.37 The EIA has been undertaken having regard to the National Planning Policy Framework¹⁴ (NPPF). The NPPF sets out the Government's economic, environmental and social planning policies for England. The policies contained within the NPPF articulate the Government's vision of sustainable development, which are intended to be interpreted at a local level, to meet the requirements of local aspirations.

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

2.39 The EIA has also referred to the Planning Practice Guidance (PPG), which is an online resource. The PPG aims to make planning guidance more accessible, and to ensure that the guidance is kept up to date.

Strategic Planning Policy and Guidance

2.40 As relevant to the EIA technical topic scope, methodology or assessment of effects, the ES has regard to the following key strategic planning documents. Any additional regional planning policy and guidance documents considered relevant to the technical assessments will also be considered:

- The London Plan: The Spatial Development Strategy for Greater London (March 2021)¹⁵ – hereafter referred to as 'the London Plan'; and
- Supplementary Planning Guidance (SPG) (i.e. further guidance on policies in the London Plan that cannot be addressed in sufficient detail in the plan itself). The relevant SPG's are referenced accordingly throughout the technical topics.

Local Planning Policy and Guidance

2.41 As relevant to the EIA technical topic scope, methodology or assessment of effects, the ES has had to regard to the following key local planning policy and guidance documents.

London Borough of Tower Hamlet's (LBTH) Local Plan

2.42 The LBTH's new Local Plan¹⁶ was adopted by the Council in January 2020. The 'Local Plan 2031: Managing Growth and Sharing Benefits' supersedes the previous Local Plan 2010¹⁷, which consisted of the Core Strategy (2010)¹⁸ and Managing Development Document (2013)¹⁹.

2.43 The Local Plan 2031 is the principal document guiding development and growth within the LBTH, and provides spatial policies, development management policies and site allocations to guide development within the borough.

2.44 The Site is partially located within the Ailsa Street Site Allocation, as designated under the new Local Plan 2031¹⁶. The site allocation outlines a number of design principles and delivery considerations for new developments. The design principles include the provision of appropriate building heights, scale and massing and the avoidance of significant adverse environmental impacts. This includes the provision of an active and well-defined street frontage along Lochnagar Street and create a stronger east-west link between the River Lea and the Langdon Park DLR station and improve the quality and introduce an active square at the corner of the A12 and Lochnagar Street.

2.45 The Site is located within the Draft Leaside Area Action Plan (2021)²⁰ under Site: LS-A, which aims to improve the quality and connectivity of the area, encourage new employment, access to community facilities and policies relating to the type and quality of open spaces and homes in the area.

2.46 The Site is also located within the Poplar Riverside Opportunity area which is considered to have an indicative capacity of providing 9,000 homes and 3,000 jobs²⁰.

2.47 The Site is grouped under the Lower Lea Valley Opportunity Area, which across the area, has the potential capacity to provide a minimum of 32,000 new homes and 50,000 indicative employment capacity²¹.

2.48 Any additional planning policy and guidance documents considered relevant to the technical topics scope, methodology or assessment of effects which are covered by the EIA are also considered; these are identified in the relevant sections of this ES (**ES Volume 1, Chapters 6 - 14** and **ES Volume 2**).

2.49 In addition, where relevant to the assessment, the ES also presents a summary of any pertinent recognised industry guidance documents.

Other Guidance

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

EIA SCOPING AND CONSULTATION

Consultation

2.51 Consultation with the LBTH and public engagement has helped inform the design of the Proposed Development. **ES Volume 1, Chapter 3: Alternatives and Design Evolution** of this ES provides a review of the alternatives considered by the Applicant and the design evolution of the Proposed Development, specifically in relation to environmental considerations and the pre application consultation process and feedback.

2.52 The Planning Application is supported by a Planning Statement²² and a Statement of Community Involvement²³ which together summarise the wider consultation that has been undertaken with various consultees and local residents throughout the pre-application consultation process.

EIA Scoping

2.53 Scoping forms one of the first stages of the EIA process and it is through EIA scoping that the Local Planning Authority ('LPA') (in this case the LBTH) and other key statutory and non-statutory consultees are consulted on those environmental topics that should be included in the scope of the EIA.

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

⁴ Institute of Environmental Management and Assessment, 2004, Guidelines for Environmental Impact Assessment.

⁵ Institute of Environmental Management and Assessment, 2011. The State of Environmental Impact Assessment Practice in the UK.

⁶ Institute of Environmental Management and Assessment, November 2015. Shaping Better Quality Development.

⁷ Institute of Environmental Management and Assessment, 2016; Delivering Better Quality Development.

⁸ Institute of Environmental Management and Assessment, 2017; Delivering Proportionate EIA.

⁹ Institute of Environmental Management and Assessment, 2020; Materials and Waste in EIA.

¹⁰ IEMA, 2020, Major Accidents and Disasters Guidelines

¹¹ Institute of Environmental Management and Assessment, 2017, Assessing Greenhouse Gas Emissions and Evaluating their Significance'

¹² Institute of Environmental Management and Assessment, 1993 'Environmental Assessment of Road Traffic'

¹³ <https://infrastructure.planninginspectorate.gov.uk/>

¹⁴ DCLG, 2021; 'National Planning Policy Framework.'

¹⁵ GLA, 2021; 'The London Plan: The Spatial Development Strategy for Greater London - March 2021.'

¹⁶ London Borough of Tower Hamlets, 2020 Local Plan 2031: Managing Growth and Sharing Benefits

¹⁷ London Borough of Tower Hamlets, 2010, Local Plan

¹⁸ London Borough of Tower Hamlets, 2010, Core Strategy Development Plan Document, 2025

¹⁹ London Borough of Tower Hamlets, 2013, Managing Development Document – Development Plan Document

²⁰ GLA, 2021; 'The London Plan: The Spatial Development Strategy for Greater London - March 2021.'

²¹ Mayor of London, London Assembly, Lower Lea Valley Opportunity Area, Adopted 2007.

²² DP9, 2021, Aberfeldy New Village Planning Statement

²³ Lowick, 2021, Aberfeldy New Village Statement of Community Involvement

2.54 The process of EIA scoping and consultation is important to the development of a comprehensive and balanced ES. Views of consultees have helped to identify specific issues that require further investigation as part of the EIA process.

2.55 The main purpose of the EIA scoping process is to establish the approach to the EIA. This includes:

- Identification of the availability of existing baseline data and appropriate baseline surveys to be undertaken;
- Identification of sensitive receptors;
- Identification of potential environmental considerations and potential environmental effects;
- Identification of the topics to be included within the scope of the EIA and the methodology for assessment;
- Identification of any topics that can be scoped out of the EIA, with justification provided as to why likely significant residual environmental effects are not anticipated;
- Definition of the methodology for the assessment of the likely significant environmental effects; and
- Identification of other development schemes to be considered within a cumulative effects assessment.

2.56 A request for an EIA Scoping Opinion from the LBTH and statutory consultees in line with Regulation 18(4) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended in 2018 and 2020^[1] ('the EIA Regulations')²⁴ was submitted to the LBTH on 12th August 2021. The request was made in the form of a Scoping Report (Aberfeldy New Masterplan EIA Scoping Report).

2.57 The LBTH issued their Scoping Opinion on 8th September 2021. The Aberfeldy New Masterplan EIA Scoping Report, along with LBTH Scoping Opinion is provided in **ES Volume 3, Appendix: EIA Methodology – Annex 1**. The EIA Scoping process has informed the content of the ES. A response to the key components of the Scoping Opinion is provided in **ES Volume 3, Appendix: EIA Methodology – Annex 2**.

2.58 A summary of the key scoping consultation points have been presented within the introductory table of each technical chapter **ES Volume 1, Chapters 6 - 14**, with **ES Volume 2** providing an in text summary of the consultation undertaken.

2.59 The EIA Scoping Report was submitted with a redline boundary plan which included areas of land with the potential to be included within the planning application boundary. The final decision on their inclusion was taken prior to the receipt of the Scoping Opinion following agreement with the LBTH on the best approach in securing the delivery of works to those areas of land now not included within the redline boundary.

2.60 Also following the submission of the EIA Scoping Report, the maximum building height of the Proposed Development has increased from 96m AOD to 100m AOD. This increase will not result in any material change to the scope and approach of the technical environmental assessment and therefore the approach outlined within the EIA Scoping Report (and the LBTH EIA Scoping Opinion, as relevant) remains valid.

'Scoped-In' Aspects

2.61 The potentially significant environmental issues that were identified during the EIA Scoping process and that have been addressed within this EIA are listed below:

- Socio-economics; (ES Volume 1: Chapter 6).
- Traffic and Transport; (ES Volume 1: Chapter 7).
- Air Quality; (ES Volume 1: Chapter 8).
- Climate Change; (ES Volume 1: Chapter 9).
- Noise and Vibration; (ES Volume 1: Chapter 10).
- Archaeology (Buried Heritage); (ES Volume 1: Chapter 11).
- Water Resources, Flood Risk and Drainage (ES Volume 1: Chapter 12).
- Wind Microclimate; (ES Volume 1: Chapter 13).

- Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare; (ES Volume 1: Chapter 14).
- Built Heritage (ES Volume 3).
- Townscape and Visual Impact Assessment; (ES Volume 3).
- Health is addressed through a Health Impact Assessment that is presented as a stand-alone Health Impact Assessment. The Health Impact Assessment has been undertaken in accordance with the London Healthy Urban Development Unit Planning for Health Rapid Health Impact Assessment (HUDU Rapid HIA) tool which is the most appropriate guidance for such assessments. The Health Impact Assessment has not been fully integrated into the ES; primarily due to the differing methodologies and the approach to categorisation of likely effects. However, in acknowledgment of their interface and the need to consider impacts to population and human health, the main findings and conclusions of the Health Impact Assessment have been reviewed and the single significant effect identified (relating to the potential effect on healthcare services, i.e. GPs) is also reported in **ES Volume 1, Chapter 6: Socio-economics**, and so is also presented in **ES Volume 1, Chapter 16: Likely Significant Effects and Conclusions. Table 2.1** presents a wayfinding table of where the topic of human health has been considered within the ES and the Planning Application.

Table 2.1 Human Health Wayfinding Table

Topics	How the Human Health has been Considered
Air Quality	The ES has considered the potential impact of changes to air quality on human health (both receptors external to the Site, and for future occupants and visitors at ground floor within the Proposed Development), from dust generated during the enabling and construction works, and from introduced sources associated with the Proposed Development, including transport emissions (i.e. servicing) when operational.
Health	Health has been specifically considered with the Health Impact Assessment (HIA) which forms a standalone document submitted in support of the planning application.
Daylight, Sunlight and Overshadowing	The ES and planning application has considered the potential impact of the Proposed Development on human health from Daylight, Sunlight, Overshadowing and Solar Glare – particularly the effect of change in conditions at highly sensitive receptor locations within the Site (public amenity areas) and surrounding local area (refer to ES Volume 1, Chapter 14: Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution) and on future residents at the Site. An internal daylight sunlight assessment forms a standalone document submitted in support of the planning application.
Ground Conditions	Human Health is considered as a sensitive receptor within the Phase 1 Ground Conditions Report Refer to ES Volume 3, Appendix Methodology – Annex 2 .
Noise and Vibration	The ES has considered the potential impact of the Proposed Development on human health from noise and vibration – particularly the effect of the predicted change in noise and vibration levels at high sensitive receptor locations within the Site and surrounding local area and on future residents at the Site, from both the demolition and construction, and operational phases. Refer to ES Volume 1, Chapter 10: Noise and Vibration
Socioeconomics	The ES has considered the impact of the Proposed Development on the local social infrastructure arising from the new residential population, such as doctors (GPs), amenity and playspace areas, etc. Consideration is also given to other aspects that are linked to health, such as the local economy in terms of employment opportunities and local spending, which in turn has direct and indirect benefits on the population at the local and borough spatial levels, as well as new provision of public realm to benefit both future occupants and visitors to the Site, as well as the wider community. Refer to ES Volume 1, Chapter 6: Socio-Economics .
Traffic Transport	The ES has considered the impact of the Proposed Development on existing and future road users. The assessment also takes account of pedestrians along the surrounding road network, in terms of their amenity, fear and intimidation; their potential for severance from places and other people; and with regard to the risk for accidents and their safety. Refer to ES Volume 1, Chapter 7: Traffic and Transport .
Water Resources, Flood Risk and Drainage	The ES has considered the impact of the Proposed Development on the existing and proposed drainage network. The assessment also takes account of water quality and flood risk. Refer to ES Volume 3, Appendix Water Resources, Flood risk and Drainage – Annex 1 and Annex 2 .
Wind Microclimate	The ES has considered the wind microclimate interactions with human health through the assessment of safety breaches and comfort criteria for the Proposed Development. Refer to ES Volume 1, Chapter 13: Wind Microclimate .

²⁴ Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018

Topics	How the Human Health has been Considered
Demolition and Construction	A Construction Environmental Management Plan (CEMP) and Logistics Plan (CLP) would be adhered to in advance of works commencing on-site, to manage the potential impacts from the works (including those on human health) and subsequent construction of the Proposed Development. The CEMP would include key matters relating to health impact including public safety, and amenity and site security. An Outline CEMP has been produced to accompany this planning application. ES Volume 3, Appendix Demolition and Construction – Annex 1.

Scoped-Out Disciplines

2.62 The Scoping Report identifies the technical topics that have been scoped out of (i.e. excluded from) the EIA. The approach to these technical topics has been agreed with LBTH as part of the EIA scoping exercise. The justification for scoping out these topics from the EIA, as well as the points raised by the LBTH in respect of the approach can be found within the Scoping Report and Scoping Opinion presented in **ES Volume 3, Appendix: EIA Methodology – Annex 1 and Annex 2 and Annex 3**. The technical topics scoped out of the EIA and the justification for doing so are summarised below:

- **Ecology and Biodiversity:** A Preliminary Ecological Appraisal (PEA) has been prepared for the Site and will be presented as a stand-alone document to accompany the planning application. This concludes that the existing Site is of low ecological value and that there is low potential to support foraging, commuting and roosting bats, moderate potential to support nesting birds and no potential to support black redstart. However, the presence of invasive / non-invasive species (INNS), including Virginia Creeper and Buddleia has been confirmed. LBTH response to the Scoping Report identified that Ecology and Biodiversity should be included as a standalone aspect within the ES based on the PEA submitted alongside the scoping report, did not include the final application site boundary, therefore a proper assessment could not be provided by LBTH, resulting in their decision being to scope in this aspect. As the existing Jolly's Green open space is no longer 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. Further justification on the approach to the scoping out of ecology and biodiversity of the ES is provided within **ES Volume 3, Appendix Methodology – Annex 3**. Ecological enhancements included in the design of the Proposed Development are discussed in **ES Volume 1, Chapter 4: Proposed Development**.
- **Daylight, Sunlight and Overshadowing - Internal:** The potential for daylight and sunlight availability within the newly proposed residential units and within the newly created public realm is dependent on the design of the Proposed Development, and is a design consideration, rather than an EIA issue. Therefore, the assessment of daylight and sunlight availability (including overshadowing) within the Proposed Development itself will not form part of the ES but will be presented as a separate standalone report submitted in support of the planning application. This approach was agreed within the LBTH within the Scoping Opinion received 8th September 2021, as presented within **ES Volume 3, Appendix Methodology – Annex 3**.
- **Geoenvironmental (Ground Conditions, Groundwater and Land Take and Soils):** Based on the information and risk assessment obtained within the Phase A Preliminary Geo-Environmental and Geotechnical Risk Assessment which indicates that the risk to construction workers, future site users, neighbours and resources such as groundwater, is low to moderate. It is therefore considered that through the use of standard mitigation and monitoring measures, this topic can be Scoped Out of the ES. This was agreed with the LBTH through their Scoping Opinion, received 8th September 2021. The mitigation and management measures with respect to ground conditions, groundwater, land take and soils will be addressed in **ES Volume 1, Chapter 17: Mitigation and Monitoring**.
- **Project Vulnerability:** A review of the IEMA guidance (2020) 'Major Accidents and Disasters in EIA: A Primer'²⁵ 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 flooding (from either fluvial or pluvial) sources have been considered within **ES Volume 1, Chapter 12: Water Resources, Flood Risk and Drainage**. The potential for strong winds is considered within **ES Volume 1, Chapter 13: Wind Microclimate** and any potential for Solar Glare is considered within **ES Volume 1, Chapter 14: Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution**, as relevant. The potential for ground contamination and UXO risk has been considered as part of the ES and mitigation measures are provided within **ES Volume 1, Chapter 17: Mitigation and Monitoring Schedule**. As such, and in line with the approach followed during the preparation of the EIA Scoping Report, an assessment of the Proposed Development's vulnerability to major accidents and natural disasters has been screened out of further assessment in the EIA. This ES will therefore not specifically consider the issue of major accidents and natural disasters any further. This approach aligns with that of the view by LBTH that a stand-alone project vulnerability (major accidents and disasters) chapter is not necessary, and that the risks will be assessed across the other aspects of the ES.

- **Waste:** Waste has been scoped out of the EIA as no significant effects are anticipated on the local waste management infrastructure and landfill capacity and in line with IEMA Guidance³⁴. The approximate type and quantities / volumes of demolition and construction waste that are expected to be generated by the Proposed Development, the target value for re-use of demolition and construction waste and an outline of the relevant waste aspects of the CEMP will be provided. An Operational Waste Management Strategy (OWMS) will be prepared and submitted as a standalone document as part of the planning application. has also been prepared and submitted with the Planning Application. The approximate type and quantities / volumes of operational waste that are expected to be generated by the operational Proposed Development and an outline of CEMP is provided within **ES Volume 1, Chapter 5: Demolition and Construction, ES Volume 3, Appendix Demolition and Construction – Annex 1, and ES Volume 1: Chapter 17: Mitigation and Monitoring**. This approach was agreed with the LBTH within their Scoping Opinion received 8th September 2021, and presented within **ES Volume 3, Appendix Methodology – Annex 3**.
- **Materials:** LBTH response to the Scoping Report states that a materials assessment and associated chapter should be scoped into the ES (as provided within **ES Volume 3, Appendix EIA Methodology – Annex 2**), unless it can be adequately justified that no likely significant effects on materials will occur during the demolition and construction, and operation of the Proposed Development. Further justification on this point is therefore provided below:
 - 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'²⁶ and within the LBTH and London.
 - In accordance with IEMA's guide to Materials and Waste in Environmental Impact Assessment²⁷, 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."
 - 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:
 - Primary mitigation measures: are "an intrinsic part of the development, and do not require additional action to be taken"²⁸; for example, choosing to refurbish an existing building, rather than demolish it;
 - 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"²⁹; 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

²⁵ IEMA, 2020, Major Accidents and Disasters Guidelines

²⁶ 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.

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

²⁸ IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 19).

²⁹ IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 27).

considered standard practices used to manage commonly occurring environmental effects”³⁰; for example, sending waste to active and permitted waste management sites, which have to adhere to the requirements of the Environmental Permitting Regulations³¹, 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.

- 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:
 - 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 Specification³² 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.
 - 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.
 - On the basis of the above, an assessment of demolition and construction effects on materials is scope out; however, the ES sets out:
 - The approximate type and quantities / volumes of materials that are anticipated to be required for the construction of the Proposed Development;
 - The sustainability credentials of materials (if known); and
 - The commitment to undertaking the measures outlined above.
- 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.
- The EIA Scoping Opinion requested consideration of decommissioning of the Proposed Development. 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.

EIA METHODOLOGY

- 2.63** Detailed methodologies for the assessment of each of the environmental topic areas scoped into the EIA are provided within each technical ES Chapter (**ES Volume 1, Chapters: 6 - 14** and **ES Volume 2**), however, in general terms, the assessments have been based upon:
- Understanding the baseline condition, either through:
 - Desk-top studies;
 - Site surveys;
 - Understanding the policy context and the implications for assessment, including:
 - Consideration of relevant legislation;

- Consideration of relevant planning policies (national, regional and local);
- Identify potentially sensitive receptors that could be impacted by the Proposed Development;
- Identification of potential environmental impacts, with an evaluation of their likely magnitude, and resultant effects in terms of their nature, scale, geographic extent, duration and whether they are direct or indirect or transboundary, involving either:
 - The use of technical guidance and best practice; and/or
 - Expert opinion.
- Consideration of the requirement for any specific mitigation; and
- Consultation with any interested and affected parties.

- 2.64** How the Proposed Development might affect the environment relies on predictions about what impact a certain action will have. Some predictions can be made using mathematical or simulation models (i.e. quantitative assessment). Other impacts are less easy to predict in quantitative terms, and in such cases, the EIA attempts to quantify the anticipated scale of impact using professional judgement (i.e. qualitative assessment).
- 2.65** As part of the EIA, an iterative approach has been adopted where significant environmental effects have been identified and avoided where possible in the first instance through consideration of alternative design solutions and design refinements, as reported upon within **ES Volume 1, Chapter 3: Alternatives and Design Evolution**. Where able, opportunities to reduce or control impacts and effects have been identified and incorporated into the Proposed Development (i.e. primary mitigation³³). In addition, the design process seeks to promote opportunities to enhance the beneficial environmental effects of the Proposed Development.
- 2.66** Mitigation is the term used to refer to the process of avoiding where possible and, if not, minimising, controlling and/or off-setting potentially significant adverse effects of a development. Mitigation measures can relate to the masterplanning stage; detailed design stage; the construction stage; or the activities associated with the operation of the completed Proposed Development. Where mitigation has been embedded within the Proposed Development to avoid or reduce potentially significant effects, these are described within **ES Volume 1, Chapter 4: The Proposed Development**. Where relevant these measures are also described within the technical chapters of the ES (**ES Volume 1, Chapters: 6 to 14** and **ES Volume 2**).
- 2.67** In accordance with the EIA Regulations, as amended in 2018 and 2020, the method behind the EIA process generally considers the existing conditions of the area into which the Proposed Development is being introduced (the **baseline**), providing a **future baseline** in some cases where the area around the site is undergoing extensive, planned, change and is evolving rapidly, and makes reasonable predictions of the likely change (the **impact** – in terms of magnitude) that may occur, during both its construction and when the development is completed and operating as proposed. The predicted impact is considered in terms of key environmental and social aspects (**receptors**) found within the surrounding area, and based on their sensitivity to change, the scale of the resulting change experienced by the receptor / resource (the **effect**) is then determined along with a statement on whether the effect is significant or not.
- 2.68** Any mitigation measures required to reduce or eliminate significant adverse effects are then considered and assessed, with the resulting residual effect scale being determined. Effects resulting from a combination of the Proposed Development and other surrounding schemes (**cumulative schemes**) are also assessed. All the likely effects of the Proposed Development are reported (within this ES) and the likely significant effects are specifically highlighted. The ES is then considered by the relevant planning authority (in this case, the LBTH) when deciding whether to grant planning permission for the Proposed Development.

Baseline Conditions

- 2.69** The baseline comprises existing information, or information collected through baseline surveys undertaken during the course of the EIA process. This information has been used in the ES to present (within each of the individual technical ES Chapters (**ES Volume 1, Chapters: 6 to 14** and **ES Volume 2**)) an up to date description of the current baseline conditions of the site and surrounding area.
- 2.70** The purpose of the EIA is to predict how environmental conditions may change as a result of the Proposed Development. The assessment of the nature and scale of a predicted change is undertaken against a reference

³⁰ IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 20).

³¹ The Environmental Permitting (England and Wales) Regulations 2016

³² BRE, (2009); The Green Guide to Specification, Fourth Edition.

³³ IEMA July 2016, Environmental Impact Assessment Guide to: Developing Quality Development)

<https://www.iema.net/assets/newbuild/documents/Delivering%20Quality%20Development.pdf>.

condition, known as the 'baseline'. In most cases, the baseline represents the environmental condition of the site being assessed and the surrounding area at the time of the assessment.

- 2.71 For most technical disciplines, the baseline has been taken as the existing conditions within the site. However, in some cases it may be necessary to apply a 'future' baseline. This is relevant when considering the peak construction year once the development is open but not yet completed and fully occupied. A future baseline is also used for when considering potential effects when the development is complete and fully operational.
- 2.72 Where this is required, the approach to defining the future baseline has been explained (with reference to the assessment scenarios) within the relevant technical ES Chapter (for example **ES Volume 1, Chapter 7: Traffic and Transport, ES Volume 1, Chapter 8: Air Quality, ES Volume 1, Chapter 10: Noise and Vibration**).

Evolution of the Baseline

- 2.73 In accordance with the requirements of the EIA Regulations, as amended in 2018 and 2020, consideration as to how the existing baseline condition may evolve in the future in the absence of the Proposed Development. The EIA Regulations state (Schedule 4(3)):

“A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.”

- 2.74 This requirement has been addressed in the ES (within each of the individual technical ES Chapters (**ES Volume 1, Chapters: 6 to 14 and ES Volume 2**) under the heading 'Evolution of the Baseline Condition'. The description of the evolved baseline has been characterised by interpreting an indeterminate point in the future, for a scenario which assumes that all the committed developments are built³⁴, in the absence of the Proposed Development being implemented. For the Built Heritage, Townscape and Visual Impact Assessments, consideration has also been given to the natural evolution of relevant features, though this is considered in the context of the existing uses (both onsite and in the surrounding area) and their likeliness to affect any natural evolution.
- 2.75 The likely evolution of the baseline conditions will be quantified where possible. Where not possible, a qualitative review will be presented. The approach taken to providing an outline of the evolution of the baseline will be described within each of the individual technical ES Chapters (**ES Volume 1, Chapters: 6 - 14 and ES Volume 2**).

Sensitive Receptors

- 2.76 The EIA has identified and assessed the impacts to and effects on potential receptors which may arise from the demolition of the existing Site and construction of the Proposed Development, and once the Proposed Development is completed and operational.
- 2.77 Within each of the technical assessments (**ES Volume 1, Chapters 6 - 14 and ES Volume 2**), a list of receptors is presented, which are considered to have the potential to be affected by the Proposed Development.
- 2.78 The receptors identified within the technical assessments have been identified from a review of the available information collected as part of the description of the surrounding environmental and socio-economic context, and from historic and currently available information relating to the Site itself. Potential receptors have also been identified from a review of the description of the Proposed Development (**ES Volume 1, Chapter 4: The Proposed Development**) sought for approval and the potential impacts and resultant effects which may occur as a result of newly introduced receptors of the Proposed Development.

Covid-19

- 2.79 During the preparation of this ES, government measures implemented in response to the Covid-19 situation have limited / restricted the completion of some site visits, monitoring activities that would be typically undertaken, and potentially influenced the data obtained through surveys undertaken. Where relevant, this is reported in the individual technical ES Chapters (**ES Volume 1, Chapters: 6 - 14 and ES Volume 2**).
- 2.80 Published guidance applicable to an individual technical topic has been considered where relevant, which provides guidance as to undertaking assessments during the Covid-19 pandemic. Where this is available and relevant to the technical topic, this has been referenced within the technical chapter.

Impact Assessment

- 2.81 Impact assessments are undertaken for the following stages of the Proposed Development:
- During the demolition and construction works; and
 - Once the Proposed Development is complete and operational.

Demolition and Construction Effects

- 2.82 The **ES Volume 1, Chapter 5: Demolition and Construction** provides an outline of the anticipated demolition and construction programme, as well as related activities and aspects (i.e. enabling works, excavation volumes and construction material quantities, HGV movements and HGV routing). Demolition and construction assumptions were developed based on the Illustrative Masterplan in combination with professional judgment at this stage. The use of the Illustrative Masterplan for this purpose was considered appropriate and reasonable due to the similarities between the Illustrative Masterplan and the Maximum Parameters of the Outline Proposals of the Proposed Development.
- 2.83 The programme represented is based on reasonable assumptions in terms of the sequencing of the works and site logistics that will be implemented. The programme is considered achievable based on the current level of demolition and construction planning and anticipates the period of construction works are continuous across the Site.
- 2.84 The programme presents some overlapping construction activities both within and between the phases and therefore assumes multiple construction activities occurring across the site. It is also assumed that impacts of a higher magnitude over a shorter duration are considered to be potentially greater in terms of the likely effect on a receptor, than an impact of lower magnitude spread over a longer duration. The EIA, therefore, assesses the worst-case effects (in terms of magnitude of impact) as a result of multiple construction activities occurring on-site at any particular time.
- 2.85 Due to the proposed construction phasing, an interim assessment has been considered appropriate for some of the technical assessments. This seeks to identify potential significant effects to the new receptors (occupants) within the Detailed Proposals (Phase A) during the construction of the Outline Proposals. In summary, the ES includes a quantitative assessment of the phased construction related effects for the following technical topics: traffic, air quality, noise and vibration, socio-economics and wind microclimate. Further detail on the approach taken is identified within each technical chapter.
- 2.86 The information presented within **ES Volume 1, Chapter 5: Demolition and Construction** has informed the demolition and construction impact assessments of each technical ES Chapters (**ES Volume 1, Chapters: 6 to 14 and ES Volume 2**).
- 2.87 Within the construction impact assessments, standard environmental controls required under legislation and best practice guidance will be considered (i.e. embedded mitigation) and will be clearly presented within the respective technical ES Chapter as to how they are accounted for within the corresponding assessment and summarised within **ES Volume 1, Chapter 17: Mitigation and Monitoring**.
- 2.88 The construction assessments will also identify (where required) the need for any additional or bespoke environmental management or mitigation measures in order avoid, prevent, reduce or off-set any significant adverse effects identified.
- 2.89 A description of any proposed monitoring arrangements will also be identified and would define (where appropriate) the procedures regarding the monitoring of the relevant significant adverse effects, the types of parameters to be monitored and the monitoring duration.
- 2.90 All the measures proposed within the technical ES Chapters will be compiled and presented in a mitigation and monitoring schedule within **ES Volume 1, Chapter 17: Mitigation and Monitoring**.
- 2.91 It is anticipated that any required construction related environmental management / mitigation and monitoring measures identified within the ES would be secured and controlled through appropriate a Construction Environmental Management Plan (CEMP) and Construction Logistics Plan (CLP) (further discussed within **ES Volume 1, Chapter 17: Mitigation and Monitoring**). An outline CEMP is provided within **ES Volume 3, Appendix Demolition and Construction – Annex 1**, with the requirement for a final CEMP secured by means of a suitably worded planning condition to be attached to the planning permission. Key mitigation and management controls have been presented in this ES and these should be pulled through into the final CEMP.

³⁴ The approach adopts the rationale that if there are committed developments identified (i.e. existing and/or approved projects) to come forward in the future, this would account for a 'natural change' to the baseline scenario.

Completed and Occupied Development Effects

- 2.92** The ES presents a description of the Proposed Development in **ES Volume 1, Chapter 4: The Proposed Development** in order to provide suitable context to enable the assessment of potential and likely significant environmental effects. The impact assessment of the Proposed Development is based on the information contained within the Control Documents and Detailed Proposal Documents as described in **ES Volume 1, Chapter 4: The Proposed Development**. In addition, where necessary to inform the impact assessments, information on the illustrative masterplan has been taken from other documents that have been prepared for the purposes of and which, are submitted alongside the planning application, for example, the Design and Access Statement, Energy and Sustainability Strategy, Planning Statement and Transport Assessment. Where information from these documents have been relied upon, the information has been presented within the ES.
- 2.93** The impact assessment has been undertaken against an appropriate baseline condition for the technical topic in question. However, where relevant to an individual technical assessment, the Proposed Development has been assessed against a future baseline. This then means that the impact assessments account for potentially sensitive receptors found within the existing baseline conditions and any additional potentially sensitive receptors that may be apparent within the surrounding area in the future. The specific methodology for assessment of the Proposed Development (including the parameters assessed to predict a reasonable worst case assumption) has been set out within the technical chapters of **ES Volume 1 (Chapters 6-14 and ES Volume 2)**.
- 2.94** For traffic and transport alone, the Proposed Development has been assessed delivery of up to 2,997m² (GIA) of workspace. These areas are designed to be smaller units which could include incubators, maker spaces, studios, co-working and managed workspaces. The workspace floor area assessed includes the Phase A temporary marketing suite (Sui Generis), which is expected to revert to retail once its use as a marketing suite is no longer required. As the temporary marketing suite is expected to function more akin to an office, with peak hour employee trips and visitors throughout the day, it was considered by the transport consultants based on professional judgement that it is most appropriate to assess the use as part of the workspace trip generation. The socioeconomic assessment differs in approach where it assesses the temporary marketing suite as retail. Both assessments provide a reasonable worst case.

Cumulative Effects

Effect Interactions (Intra-project effects)

- 2.95** Intra-project cumulative effects from the Proposed Development itself on surrounding sensitive receptors during the construction works and also once the Proposed Development is completed are considered within this ES (**ES Volume 1, Chapter 15: Effects Interactions**). Effect interactions occur as interactions between effects associated with just one project, i.e. the combination of individual effects arising as a result of the Proposed Development, for example effects in relation to noise, airborne dust or traffic on a single receptor.
- 2.96** Effect interactions from the Proposed Development itself on particular receptors at the site and surrounds have been considered during the demolition and construction works and also once the Proposed Development is completed and operational. Dependent on the relevant sensitive receptors, the assessment focuses either on key individual receptors or on groups considered to be most sensitive to potential effect interactions. The potential interaction of residual effects that are of minor, moderate or major scale (see section 'Assessment Criteria' below for further details), are considered within this assessment. Based on the definitions of what negligible effects comprise for each of the technical assessments, these do not warrant further consideration in relation to cumulative effects and therefore are not pulled through into the assessment of effect interactions. Only residual effects described as minor and above are therefore considered in the assessment of effect interactions.
- 2.97** There is no established methodology for assessing the impact of cumulative effects on a particular receptor. Therefore, the interaction of a combination of individual effects are determined to be either 'not significant' or 'significant', and a scale of the combined effects (minor, moderate or major) is not applied. However, the European Commission has produced guidelines to assist EIA practitioners in developing an approach which is appropriate to a project. These guidelines³⁵ have been used to develop an approach which uses the defined residual effects of the Proposed Development (as presented within the technical chapters of the ES) to determine the potential for effect interactions. If one of the individual effects is significant the combination of effects would be regarded as 'significant'. If none of the individual effects are significant, consideration will be

given as to whether or not the combination of many not significant effects could result in a combined significant effect, based on professional opinion³⁶.

- 2.98** Consideration of effect interactions are presented within the ES in a separate chapter titled 'Effect Interactions' (**ES Volume 1, Chapter 15: Effect Interactions**).

Cumulative Effects with Other Committed Developments (Inter-project Effects)

- 2.99** The EIA Regulations, as amended in 2018 and 2020 require that, in assessing the effects of a particular development proposal, consideration should also be given to the likely significant effects arising from the "cumulation with other existing and/or approved projects" (Schedule 4, 5(e)).
- 2.100** Cumulative effects can occur as interactions between the effects associated with a number of projects in an area which may, on an individual basis be insignificant, but together (i.e., cumulatively), result in a significant effect. Cumulative effects arising from the Proposed Development in combination with 'other existing and / or approved projects' ('committed developments') will be considered throughout the ES. The potential for cumulative effects arising during the enabling and construction works, and once the Proposed Development is complete and operational, will be considered. Each individual technical chapter of the ES will present an assessment of the cumulative effects of the Proposed Development coming forward alongside the cumulative schemes.
- 2.101** The cumulative schemes that are considered within the ES are typically located within a 2km radius from the site, as this spatial extent is considered appropriate for determining cumulative effects in this locality. Additional cumulative schemes have been considered outside this radius as appropriate, considering the additional schemes requested by LBTH within their EIA Scoping Opinion.
- 2.102** With regards to traffic and transport considerations, major schemes beyond the 1km radius may also be accounted for to acknowledge the spatial connection with the Proposed Development via the local road network. It should be noted that the approach to the assessment of cumulative effects is synonymous with the impact assessment methodology by virtue of the fact that deriving a future road traffic baseline would account for road traffic movements associated with the cumulative schemes as background road traffic growth, many of which are likely to be more than 1km distant on the road network from the site. Cumulative schemes within the surrounding area for the purpose of the traffic and transport, air quality and noise and vibration assessment have been considered in regard to road traffic and its associated effects. This approach is entirely appropriate, given the potential for wider reaching traffic and transport impacts through the highway network.
- 2.103** Generally, the cumulative schemes to be included within a cumulative effects assessment will either have:
- Full planning consent, proposed schemes pending a decision, or a resolution to grant consent; and
 - Produce an uplift of more than 10,000 m² (Gross External Area (GEA)) of mixed-use floorspace, or over 150 residential units; or
 - Are office to residential conversions (granted under the General Permitted Development Order) giving rise to over 150 residential units.
- 2.104** These parameters have been set to allow for an initial screening exercise to determine the schemes that, based on the scale of redevelopment (amount and mix of uses), could potentially have a cumulative effect with the Proposed Development and should be considered further within the cumulative effects assessment of the EIA. By applying these parameters to all the schemes coming forward, the cumulative effects assessment of the EIA becomes more focused on the larger schemes (i.e. those with the potential to interact in a cumulative manner), rather than trying to assess all applications for planning permission, including proposals for smaller, domestic applications such as loft and garage conversions, or small scale changes of use.
- 2.105** The cumulative schemes considered within the EIA are included in **ES Volume 3, Appendix EIA Methodology – Annex 4** within this Chapter. Cumulative schemes to be assessed within the ES were presented within the EIA Scoping Report, additional cumulative schemes presented by LBTH have been included within this list as appropriate. Each technical chapter identifies which cumulative schemes have been considered, a table presenting this has been included within **ES Volume 3, Appendix EIA Methodology – Annex 5**. Where cumulative schemes have not been considered, justification has been provided.
- 2.106** The Townscape Visual Impact approach to the cumulative assessment focuses on the additional effects of the Proposed Development on top of the cumulative baseline (i.e. as if the cumulative schemes were in place).

³⁵ European Community (1999); Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions.

³⁶ The methodology for determining a significant in-combination effect has been defined by the HS2 Phase 2a: West Midlands – Crewe Scoping and Methodology Report (July 2017) and the published HS2 Phase 2a Environmental Statement Volume 1 Introduction and Methodology and

Volume 2 Community Area Reports (July 2017). The methodology for assigning significance to in combination effects has been specifically included in this ES to assess if there are any combination effects would result in a significant effect.

The GLVIA acknowledge this as one of two main assessment approaches which are acceptable. It is considered that this approach is best suited to an urban environment, in which the cumulative effects between the Proposed Development and other schemes can be complex (including situations in which the effect of the Proposed Development could be lessened or removed entirely by cumulative schemes) and because, as also acknowledged in the GLVIA, it may not be considered reasonable to assess the effect of many complex schemes other than the Proposed Development in the manner required by the alternative approach, known as the 'combined effects' approach.

Assessment Criteria

Terminology and Definitions

Reference to 'Impact' and 'Effect'

2.107 It is noted that the terms 'impact' and 'effect' are distinctly different. Having gained an understanding of the likely impact it is then important to know whether the change in environmental or socio-economic conditions results in a significant environmental effect. The impacts of the Proposed Development may or may not result in significant effects on the environment, depending on the sensitivity of the resource or receptor and potentially other factors (such as duration). The assessment of the likely significant effects of the development is a requirement identified by Schedule 4 of the EIA Regulations, as amended in 2018 and 2020.

Receptor Sensitivity and Magnitude of Impact

2.108 To achieve a consistent approach across the different technical topics addressed within this ES, assessments broadly define the **sensitivity of the receptors** that could be affected by the Proposed Development and the **magnitude of impact or change from the appropriate baseline conditions** to derive the **resultant effect**.

2.109 Terminology to describe the sensitivity of receptors and magnitude of impact or change from the baseline conditions is broadly as follows:

- High;
- Medium;
- Low;
- Negligible; and
- No Impact (in relation to magnitude of impact or change only).

2.110 Each of the technical assessments provide further detail on the definition of each of the above terms specific to the topic in question and also provides the criteria, including sources and justifications, for quantifying the different levels of receptor sensitivity and 'impact magnitude'. Where possible, this has been based upon quantitative and accepted criteria (for example, national standards for air quality and noise), together with the use of value judgement and expert interpretation.

Identification of an Effect Scale

2.111 The basis for determining the resultant effect generally considers the sensitivity of the receptor and magnitude of impact or change from the appropriate baseline conditions. A generic matrix that combines the sensitivity of the receptor and the magnitude of impact to identify the resultant effect is provided within **Table 2.2**. Where a technical topic area uses a different process for determining the scale of effect, it is noted within the relevant chapter.

Table 2.2 Scale Of Effects

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

2.112 Table 2.3 provides the broad definition of the 'scale' of the resultant effect i.e. definitions of Major, Moderate, Minor and Negligible effects. The definitions in **Table 2.2** may be adjusted to suit the technical topic in question; where this is the case revised definitions of effect scale are presented in the technical assessments of this ES.

2.113 Where there is 'No Effect' this is stated.

Table 2.3 Broad Definitions of The Scale of The Resultant Effect

Scale of Effect	Description
Major	These effects may represent key factors in the decision-making process. Potentially associated with sites and features of national importance or could be important considerations at a regional or district scale. Major effects may also relate to resources or features which are unique to a receptor and which, if lost, cannot be replaced or relocated.
Moderate	These effects, if adverse, are likely to be important at a local scale and on their own could have a material influence on decision-making.
Minor	These effects may be raised as local issues and may be of relevance in the detailed design of the project but, are unlikely to be critical in the decision-making process.
Negligible	Effects which are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error, these effects are unlikely to influence decision-making, irrespective of other effects.

Effect Nature

2.114 Table 2.4 provides a definition of the 'nature' of the resultant effect i.e. definitions of Adverse, Beneficial and Neutral. Effects that are major, moderator or minor in nature are defined in terms of nature, negligible effects are not defined.

2.115 Within the TVIA Effects are assessed as beneficial, adverse, or neutral. This is in line with guidance in the GLVIA³⁷ which states that a professional judgement should be made as to whether effects can be described as '...positive or negative (or in some cases neutral) ...' (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 development.

Table 2.4 Definition of The Nature Of The Resultant Effect

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

Geographic Extent of Effect

2.116 The ES (**Volumes 1 and 2**) identifies the geographic extent of the identified effects. At a spatial level, 'Site' or 'local' effects are those affecting the application site and neighbouring receptors, while effects upon receptors in the LBTH beyond the vicinity of the Site and its neighbours are at a 'district / borough' level. Effects affecting London are at a 'regional' level, whilst those which affect different parts of the country, or England, are considered being at a 'national' level.

Effect Duration

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

³⁷ Landscape Institute & Institute of Environmental Management and Assessment (2013); Guidelines for Landscape and Visual Impact Assessment: Third Edition, Routledge, London

Direct and Indirect

2.118 The ES identifies whether the effect is 'direct' (i.e. resulting without any intervening factors) or 'indirect' or 'secondary' (i.e. not directly caused or resulting from something else).

Residual Effects

2.119 Where mitigation measures are identified to either eliminate or reduce adverse effects, these will be incorporated into the ES, for example either through the design, or will be translated into construction commitments; or operational or managerial standards / procedures.

2.120 The ES will then highlight the 'residual' effects (those effects which remain following the implementation of suitable mitigation measures) and classifies these in accordance with the terminology defined above.

Effect Significance

2.121 Following identification of an effect, the effect scale, nature, geographic extent and duration and whether the effects are direct or indirect, using the above summarised terminology, a clear statement is then made within the ES as to whether the effect is significant or not significant. As a general rule, the following applies:

- 'Moderate' or 'major' effects are deemed to be 'significant';
- 'Minor' effects are 'not significant', although they may be a matter of local concern; and
- 'Negligible' effects are 'not significant' and not a matter of local concern.

STRUCTURE OF TECHNICAL ASSESSMENTS

2.122 This ES reports on the potential (before mitigation) and residual (after mitigation) environmental effects of the Proposed Development during the demolition and construction works and on subsequent completion and operation. The ES also concludes with a summary of the likely significant beneficial, neutral and adverse environmental effects of the Proposed Development (**ES Volume 1, Chapter 16: Likely Significant Effects and Conclusions**).

2.123 Each of the environmental topics considered in the EIA has been assigned a separate chapter in **ES Volume 1 (Chapter 6 to 14 inclusive)** and **ES Volume 2**. Within each of the **ES Volume 1** technical chapters the assessment is presented and reported in the following format:

- An Introductory Table - setting out the author of the technical topic assessment, identification of relevant appendices, key topic related considerations and consultation as part of the EIA Scoping Report / Opinion;
- Assessment Methodology – an explanation of the approach to defining the baseline conditions and assessment scenarios and evolved baseline conditions, the approach to undertaking the impact assessment (construction and operation, and any key assumptions made) and the definitions of the nature and scale of effect and what effects are deemed to be significant;
- Baseline Conditions – a description of the baseline conditions of the site and surrounding area (as relevant to the technical topic in question – may include / be based upon a future baseline);
- Receptors and Receptor Sensitivity – identification of the existing and introduced (new) receptors on the site and in the surrounding area that may be affected by the Proposed Development and identification of their sensitivity;
- Potential Effects – an assessment of the likely significant effects of the Proposed Development during demolition and construction and on completion, setting out the impacts and effects associated with each aspect of the assessment and an evaluation of their significance against defined criteria without the implementation of mitigation;
- Site Suitability – a description of site suitability assessments undertaken for the Proposed Development, included where relevant to the technical topic;
- Mitigation Measures, Monitoring and Residual Effects - a description of the mitigation measures that are being committed to and a summary of the residual effects of the Proposed Development;

- Assessment of Future Environment – an assessment of the likely significant effects of the Proposed Development in relation to both an evolution of the baseline conditions and any in combination effects with the agreed committed development; and
- Likely Significant Effects – a short statement confirming which residual effects are considered to be significant.

2.124 ES Volume 2 which comprises the Townscape, Visual Impact and Heritage Assessment, is structured as follows (noting that the assessment has been split into Part 1 – Townscape and Visual Impact, and Part 2 – Heritage):

Part 1: Townscape and Visual Impact Assessment

- Introduction - setting out the purpose of the volume;
- Planning Policy and Guidance - identification of relevant townscape and visual planning policy and guidance;
- Assessment Methodology - an explanation of the assessment framework, with reference to guidance relevant to townscape and visual assessments;
- Baseline Conditions - assessment of the current site condition and overview of the townscape baseline conditions;
- The Proposed Development - an assessment of the demolition and construction effects, and of the design quality of the completed Proposed Development;
- Views and Visual Impact Assessment - an assessment of the visual effects of the Proposed Development;
- Townscape Assessment - an assessment of the townscape effects of the Proposed Development;
- Mitigation – consideration of any mitigation measures;
- Cumulative Effects - an assessment of the effects of the Proposed Development in conjunction with relevant cumulative schemes;
- Residual Effects and Conclusion – a summary of the effects of the Proposed Development.

Part 2: Built Heritage Assessment

- Introduction - setting out the purpose of the volume;
- Legislation, Planning Policy and Guidance - identification of relevant heritage legislation, and planning policy and guidance;
- Assessment Methodology - an explanation of the assessment framework, with reference to guidance relevant to heritage assessments;
- Baseline Conditions - assessment of the current site condition and overview of the baseline heritage conditions;
- Potential Demolition and Construction Effects – an assessment of the effects of the construction of the Proposed Development on heritage receptors;
- Potential Completed Proposed Development Effects – an assessment of the effects of the completed Proposed Development on heritage receptors;
- Summary - a summary of the effects of the Proposed Development.

ASSUMPTIONS AND LIMITATIONS

2.125 The principal assumptions that have been made, and any limitations that have been identified, in undertaking the EIA are set out below. Assumptions specifically relevant to each technical topic have been set out in each technical chapter of the ES:

- Baseline conditions have been established from a variety of sources, including historical data, but due to the dynamic nature of certain aspects of the environment, conditions at the site and surrounding land uses may change;
- It is assumed that information received from third parties is accurate, complete and up to date;
- The assessments contained within each of the technical assessment chapters of the ES (**ES Volume 1, Chapters: 6 – 14** and **ES Volume 2**) are based on the assumption that mitigation measures are implemented – as set out in application drawings, through regulatory regimes or via the management controls, within **ES Volume 1, Chapter 4: The Proposed Development** and **ES Volume 1, Chapter 5: Demolition and Construction**, as well as the mitigation and monitoring measures outlined within **ES Volume 1, Chapter 17: Mitigation and Monitoring**;
- Demolition and construction works across the site would take place substantially in accordance with the programme of works described in **ES Volume 1, Chapter 5: Demolition and Construction**;
- The aim of the EIA is not to assess the Proposed Development's compliance / performance against planning policy, as this is considered within the Planning Statement that is submitted alongside the planning application. Instead reference is made to relevant national, regional and local policy and guidance to inform the scope of the assessment, the assessment methodologies applied, and the existence of any sensitive receptors to be considered;
- Where detailed information has not been available, reasonable assumptions have been made, and have been clearly set out, based on the professional experience of the author of the ES Chapter based on other developments of similar type and scale, to enable assessment of likely significant effects; and
- Cumulative Schemes identified are assumed to be implemented in accordance with the information that is publicly available and subject to the same regulatory regimes and good practice management controls as identified for the Proposed Development.