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Environmental Statement Addendum

ABERFELDY VILLAGE MASTERPLAN

Aberfeldy New Masterplan ES Addendum

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ABERFELDY ES ADDENDUM

Introduction

- 1.1 In October 2021, Aberfeldy New Village LLP (the ‘Applicant’) submitted a hybrid planning application (reference: PA/21/02377/A1) to the London Borough of Tower Hamlets (‘LBTH’) for the redevelopment of an 8.14-hectare site into a mixed-use residential scheme of 24 buildings between 2 to 28 storeys, containing up to 1,628 units. An Environmental Statement (ES) was submitted to accompany the planning application (hereafter referred to as the October 2021 ES). As part of the determination process, LBTH appointed Temple Group Ltd (‘Temple’) to undertake an independent review of the October 2021 ES. Temple has set out its considerations within an Interim Review Report (‘IRR’), which was received by Trium Environmental Consulting, the Applicant’s EIA Coordinator, on the 20th January 2022.
- 1.2 The IRR sets out items within the October 2021 ES which Temple recommend be clarified, as well as identifying those items which have the potential to be considered Regulation 25 requests. Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 relates to the provision of further information to that provided within the October 2021 ES. Should Regulation 25 issues be confirmed, associated further information requires re-consultation as part of the planning determination process for a minimum of 30 days.
- 1.3 The Applicant was given the opportunity to respond to the clarifications and potential Regulation 25 issues raised by Temple, prior to the final review report (FRR) being prepared. As such an IRR Response document has been prepared in addition to this ES Addendum to respond to the various points raised in the IRR.
- 1.4 Since the submission of the outline planning application (PA/21/02377/A1) in October 2021, post planning discussions have been held with the LBTH and statutory consultees. Following review of the LBTH comments on the application and discussions with Planning Officers at the LBTH, the redline boundary of the Proposed Development has been amended and some minor alterations to the Proposed Development have been made. The full list of the alterations is set out below under ‘Amended Proposed Development’. These are hereinafter referred to as the ‘Proposed Amendments’, forming the ‘Amended Proposed Development’. An updated redline boundary is included within **Appendix 4**.
- 1.5 As such, this report, which comprises an Environmental Statement (ES) Addendum (‘ES Addendum’) has been prepared on behalf of the Applicant to:
 - Provide further information in response to some of the items raised within the IRR; and
 - Consider the Proposed Amendments, as set out below.
- 1.6 This ES Addendum has been undertaken in accordance with the statutory procedures set out in The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as amended¹ (‘the EIA Regulations’) and should be read in conjunction with the October 2021 ES.
- 1.7 This ES Addendum builds on the analysis and assessments presented in the October 2021 ES to provide information necessary to assess the likely significant effects of the Amended Proposed Development as a whole (i.e. the complete scheme with all design changes incorporated).
- 1.8 The assessment presented in this ES Addendum is focused on updating the October 2021 ES to reflect the Proposed Amendments and any changes to the conclusions of the October 2021 ES that may occur as a result of the Amended Proposed Development, in addition to a number of the clarification and potential Regulation 25 points of the IRR. Any elements of the October 2021 ES not amended by this ES Addendum are considered to remain valid.
- 1.9 For ease of reference, Table 1.1 provides wayfinding to the replacement ES documents, and plans included as sections within this report or appendices to this report and their brief reason for inclusion, including the associated IRR reference, where relevant.
- 1.10 The IRR Response Document produced sets out each of the points of clarification and potential Regulation 25 issues of the IRR in turn, followed by the response to each item as provided by the Applicants project team. The IRR Response document is provided within **Appendix 5**.

Table 1.1 ES Addendum IRR Wayfinding

IRR Reference	Wayfinding	Reason for inclusion within this document
ES Addendum Main Document		
5	Design Evolution and Amended Proposed Development (Chapter 3 and 4) Addendum (See paragraphs 1.18 to 1.31)	As briefly described above the redline boundary of the Proposed Development has been altered to include Jolly’s Green to the west of the previous redline boundary as well as other minor alterations. This section sets out the changes that form the Amended Proposed Development now sought for approval. This sections also seeks to clarify discrepancy within Chapter 4: Proposed Development of the October 2021 ES.
n/a	Demolition and Construction (Chapter 5) (See paragraphs 1.32 to 1.39)	The demolition remains as set out in the October 2021 ES, but the sections within the Demolition and Construction (Chapter 5) addendum have been updated where necessary to present minor changes to the demolition and construction programme, demolition, and construction HGV/LGV forecast and an increase in bulk waste quantities to account for the Proposed Amendments.
5, 11	Socio-economics (Chapter 6) Addendum section (see paragraphs Error! Reference source not found. to Error! Reference source not found.)	The socio-economic section (see paragraphs Error! Reference source not found. to Error! Reference source not found.) has been updated to reflect the alterations to the cumulative assessment within the chapter, as a result of the additional cumulative schemes at Mulberry Place (PA/21/02182), Global Switch (PA/21/02777/A1) and Stroudley Walk (PA/20/01696). In addition to these cumulative schemes identified in the IRR, consideration has also been given to the recent planning application for the Ailsa Wharf scheme to the north of the site (PA/22/00210/A1). The socio-economic section has also sought to clarify discrepancy within Chapter 4: Proposed Development of the October 2021 ES is limited to the presentation of the indicative mix in Chapter 4, and that the relevant assessments in the ES are based on the correct maximum indicative mix.
Appendix 1: ES Addendum Appendix Replacement Chapters to the October 2021 ES		
33, 34, 35	Replacement Chapter 11: Archaeology	This chapter has been replaced to reflect consultee comments including those received from GLAAS and comments within the IRR (Points 33, 34 and 35).
36,37	Replacement Chapter 12: Water Resources, Drainage and Flood Risk	This chapter has been replaced in response to the comments within the IRR in relation to: Water Resources, Drainage and Flood Risk (Points 36 and 37) and comments from the Environment Agency.
56,57	Replacement Chapter 14: Daylight, Sunlight, Overshadowing	An updated chapter has been provided in the ES Addendum which includes a qualitative assessment of light pollution for the Proposed Development and addresses relevant points made in the IRR and some of the comments made in the separate review of the chapter (and appendices) undertaken by Delva Patman on behalf of the LBTH.
n/a	Replacement Chapter 15: Effect Interactions	This chapter has been updated to account for changes to the chapters as set out above.
Appendix 2: Replacement Appendices to the October 2021 ES		
11	Cumulative Scheme List and Map	This document has been updated to reflect the inclusion of Mulberry Place (PA/21/02182), Global Switch (PA/21/02777/A1) and Stroudley Walk (PA/20/01696) and Ailsa Wharf scheme (PA/22/00210/A1) cumulative schemes.
35	Revised Archaeological Desk Based Assessment	This document has been updated to address the comments within the IRR in relation to Archaeology (Points 35) and comments from GLAAS.
35	Geoarchaeological Assessment	This document has been provided to address the comments within the IRR in relation to Archaeology (Points 35) and comments from GLAAS.
38	Flood Risk Assessment and Drainage Strategy	This document has been updated in response to the comments within the IRR in relation to flood risk (Points 38) and comments from the Environment Agency. The SuDS proforma was previously provided twice, within the Drainage Strategy and within Annex 4 of Appendix Water Resources, Drainage and Flood Risk . To avoid replication it has been included only once within the drainage strategy
38	Replacement SuDS Proforma (within the Drainage Strategy)	This document has been updated in response to the comments within the IRR in relation to Ecology (Points 38) and comments from the Environment Agency.
Appendix 3: Replacement NTS		

¹ Statutory Instruments, 2017, No. 571, Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as Amended

IRR Reference	Wayfinding	Reason for inclusion within this document
10, 11	Replacement Non-Technical Summary	This replacement ES Non-Technical Summary has been produced to reflect all changes to the ES as amended by the clarifications and Regulation 25 requests set out above, as well as the Amended Proposed Development.
Appendix 4: Supplementary Documents		
n/a	Revised Redline	The updated redline boundary to reflect alternations made.
7	Winter Garden Plan	A figure showing the location of the winter gardens is provided to address the request set out in the IRR.
16	Playspace Plan	A Phase A Play Space plan is provided in the ES Addendum and has been submitted to the LBTH as a planning drawing for approval.
n/a	Revised Principal Public Realm Areas Map	A figure showing the location of the Revised Principal Public Realm Areas is provided to address the request set out in the IRR.
n/a	Revised Indicative Demolition and Construction Programme	The revised Indicative Demolition and Construction Programme (Figure 5.3 of the October 2021 ES) updated to reflect alternations made to the redline boundary and the Amended Proposed Development
n/a	Wind Microclimate Note	A note provided by RWDI which considers the Amended Proposed Development and the additional cumulative schemes, as set out below.
n/a	Jolly's Green Ecology Addendum	This addendum has been prepared in response to the changes to the planning application boundary
n/a	Climate Change Note	Climate Change Technical Note has been prepared to explain the changes in methodology and EIA significance and resultant implications.
n/a	Revised Cumulative ZVI	A figure showing the revised cumulative scenario following the additional cumulative schemes identified as part of the IRR and Ailsa Wharf.
n/a	Air Quality Technical Notes	These technical notes were produced in response to comments made by the Principal Air Quality Officer (PAQO) in December 2021 and February 2022.
Appendix 5: ES Interim Review Report Response Document		
all	IRR Response Document	A document collating each of the responses to points of clarification and potential Regulation 25 issues of the IRR in turn. The responses provided within (and associated appendices) relate to the Proposed Development and associated red line boundary as assessed within the October 2021 ES, for consistency and ease of reviewing the responses against the various points of the IRR. For clarity, notes have been added where relevant information has now been superseded by the Amended Proposed Development, as set out in the main body of the ES Addendum report

1.11 There has been a change in the technical EIA team since the production of the October 2021 ES. Archaeological consultancy MOLA have since been appointed to progress with the archaeology chapter, desk based assessment and geoarchaeological model. The lead archaeologist from MOLA is Rupert Featherby, his statement of competence has been included below:

- **Rupert Featherby** - Lead Archaeological Consultant Rupert Featherby has over 25 years' experience as a professional archaeologist and has specialised in archaeological assessments and EIAs for 11 years.

Additional Cumulative Schemes

1.12 The IRR raised a clarification relating to the absence of 1 Paul Julius Close (PA/13/01861/A1), Stroudley Walk (PA /20/01696) as cumulative schemes, as well as rationale for scoping out Global Switch (PA/21/02777/A1). The IRR has also requested that Mulberry Place (PA/21/02182) be considered as a cumulative scheme. 1 Paul Julius Close (PA/13/01861/A1) had already been considered as part of the baseline assessment, as it is built out. The remainder of the requested cumulative schemes have been considered below.

1.13 As such, the cumulative effects of Mulberry Place (PA/21/02182), Global Switch (PA/21/02777/A1) and Stroudley Walk (PA/20/01696) cumulative schemes have been considered as part of this ES Addendum. The additional cumulative schemes are provided within a revised cumulative scheme list and map appended to this report. Further detail on the cumulative schemes is provided in the replacement cumulative scheme list.

1.14 In addition to these cumulative schemes identified in the IRR, consideration has also been given to the recent planning application for the Ailsa Wharf scheme to the north of the site (PA/22/00210/A1). Clearance of the site

was completed in September 2021. Extensive remediation works started in October 2021 and are due to be completed in 2022. Amendments as a result of this application will mainly focus on the riverside section of the site (Buildings A, B, C and D) and the parcel of land occupied by the previously approved Building M (Phase 2). The approved courtyard buildings (blocks I, J, K, L and E, F, G, H comprising Phase 1) will remain broadly unchanged.

1.15 The inclusion of these four schemes has resulted in changes to the results of the cumulative assessment of socio-economics, however they have resulted in no changes to the conclusions or reported effects. Further detail is provided within the Review of Technical ES Chapters: Chapter 6: Socio-economics.

1.16 The wind microclimate, daylight, sunlight, overshadowing and solar glare, built heritage and townscape visual impacts specialists concluded that Mulberry Place (PA/21/02182), Global Switch (PA/21/02777/A1) and Stroudley Walk (PA/20/01696) cumulative schemes would not result in any additional or different cumulative effects to those already reported in the October 2021 ES. The Ailsa Wharf scheme (PA/22/00210/A1) has been assessed qualitatively (and in the case of built heritage and townscape visual supported by ZVI study) for these topics and resulted in no changes to the conclusions or reported effects. Further detail is provided within the relevant sections of 'Review of Technical ES Chapters' below.

1.17 Furthermore, the schemes were considered by the specialist's consultant responsible for the assessments on traffic and transport, air quality, climate change, noise and vibration, archaeology and water resources and flood risk. These specialists concluded that the additional cumulative schemes would not result in any additional or different cumulative effects to those already reported in the October 2021 ES.

Design Evolution and Amended Proposed Development (Chapter 3 and 4)

Alternatives and Design Evolution

1.18 No alternatives or locations have been considered as part of this ES Addendum, as the site remains the preferred choice for development as set out in the October 2021 ES. Furthermore, the site remains a viable redevelopment opportunity in line with current relevant planning policy,

1.19 As part of the design development the proposals have been amended to respond to conversations between the Applicant and LBTH relating to the red line boundary. As such, this Amended Proposed Development represents the next stage in the design evolution.

Amended Proposed Development

1.20 As briefly described above the redline boundary of the Proposed Development has been altered to include Jolly's Green to the west of the previous redline boundary. The following amendments form the Proposed Development now sought for approval:

- –Minor change to the extent of the Phase A boundary west of Plot F (no impact on the overall red line);
- The bike store within H1/2 relocated externally adjacent to the school boundary (two 42.64 m² bike store spaces) and 108.2 sqm (GIA) internal amenity provided within Plot H1/2;
- The location of Plot F's temporary play provision has moved from Jura House to Kilbrennen House;
- Extension of the application 'red line' boundary to include Jolly's Green to facilitate the delivery of the pedestrianisation of the Abbott Road underpass;
- Direct link and connection from the pedestrian and cyclist underpass into Jolly's Green and associated tree removal and level changes;
- Landscaping and works to Jolly's Green (with a specification in line with the proposals at Leven Rd Open Space, Braithwaite Park and Millennium Green); and
- Provision of play space in Jolly's Green.

Changes to Open Space and Play Space

1.21 The landscaping areas submitted for approval as part of the October 2021 ES will continue to be provided, as set out in the Parameter Plans.

- 1.22 The area known as Jolly's Green to the west of the Site will now be included as part of the Proposed Development and is included within the extended planning application boundary. Similar to the approach proposed for Leven Road Open Space and Braithwaite Park, the park will be re-designed - building upon and improving the parks existing assets with the addition of a few further design moves.
- 1.23 The most notable new design move to Jolly's Green is the connection to the new pedestrian under bridge that provides a 6m wide east-west connection across the A12 for use by pedestrians and cyclists.
- 1.24 The existing woodland to the east of the park against the A12 will mostly be retained and new planting will also be provided, including along the edge of the path adjacent to residents' back gardens. The existing gym equipment in the park will be relocated, and added to, in the form of an exercise trail along the woodland edge.
- 1.25 The delivery of Jolly's Green will sit within Phase B, and will form part of the Outline Proposals of the Proposed Development.
- 1.26 A Phase A Play Space plan is provided in **Appendix 4** and has been submitted to the LBTH as a planning drawing for approval. **Appendix 4** details an updated Principal Public Realm Areas map across the Outline Proposals of the Proposed Development.

Corrections

Homes to be Demolished

- 1.27 A review of the demolition information determined that there were a number of minor errors relating to homes that will be demolished, resulting in a reduction of 4 habitable rooms to be demolished. As a result, the following corrections have been considered:
 - 1 no. 3 bed house changed to a 2 bed house;
 - 1 no. 4 bed house changed to a 2 bed house; and
 - 1 no. 4 bed flat changed to a 3 bed flat.
- 1.28 Although there has been a reduction in the number of exiting habitable rooms, the total number of existing dwellings to be demolished remains 330.

Area Schedule

- 1.29 A review of the area schedules presented within Table 4.6 of **ES Volume 1, Chapter 4: Proposed Development** of the October 2021 ES indicated some minor typos in the illustrative housing mix for the Outline Proposals of the Proposed Development. The changes are shown in the amended Table 4.6 below with additions made in green and strikeouts used to indicate the previously presented information.

Table 4.6 of the October 2021 ES Outline Proposals - Illustrative Housing Mix

Unit Type	No. of Private	No. of Socially Rented	No. of Intermediate	Total
Studio	102	-	-	102
1 Bedroom	406	81	44	531
2 Bedroom	494	66	26	586
3 Bedroom	13	106	-	119
4 Bedroom	-	12	-	12
5 Bedroom	-	-	-	0
6 Bedroom	-	1	-	1
TOTAL	Up to 1015	Up to 226	Up to 70	Up to 1,351

- 1.30 A review of the area schedules presented within Table 4.13 of **ES Volume 1, Chapter 4: Proposed Development** of the October 2021 ES identified some minor typos in the housing mix of the Illustrative Scheme. The changes are shown in the amended Table 4.13 below in red with strikeouts used to indicate the previously presented information.

Unit Type	No. of Private	No. of Socially Rented	No. of Intermediate	Total
Studio	117	-	-	117
1 Bedroom	446	72	40	558
2 Bedroom	583 582	109	36 37	728
3 Bedroom	29	130	-	159
4 Bedroom	-	29	-	29
5 Bedroom	-	-	-	-
6 Bedroom	-	4	-	4
TOTAL	1,175 1,174	344	76 77	1,595

Table 4.13 of the October 2021 ES Illustrative Scheme Housing Mix (Illustrative Outline + Detailed)

Design Code and Design and Access Statement

- 1.31 The Design code, and Design and Access Statement have been updated (and submitted) to reflect the Amended Proposed Development set out above.

Demolition and Construction (Chapter 5)

- 1.32 As a result of the Amended Proposed Development, there have been some minor changes to the construction works set out in the October 2021 ES, specifically **ES Volume 1, Chapter 5: Demolition and Construction**.
- 1.33 The overall demolition and construction programme and conclusions remain as set out in the October 2021 ES, but the changes to demolition and construction information are summarised below:
 - Demolition and construction programme;
 - Demolition and construction HGV/LGV forecast; and
 - Increase in bulk waste quantities.

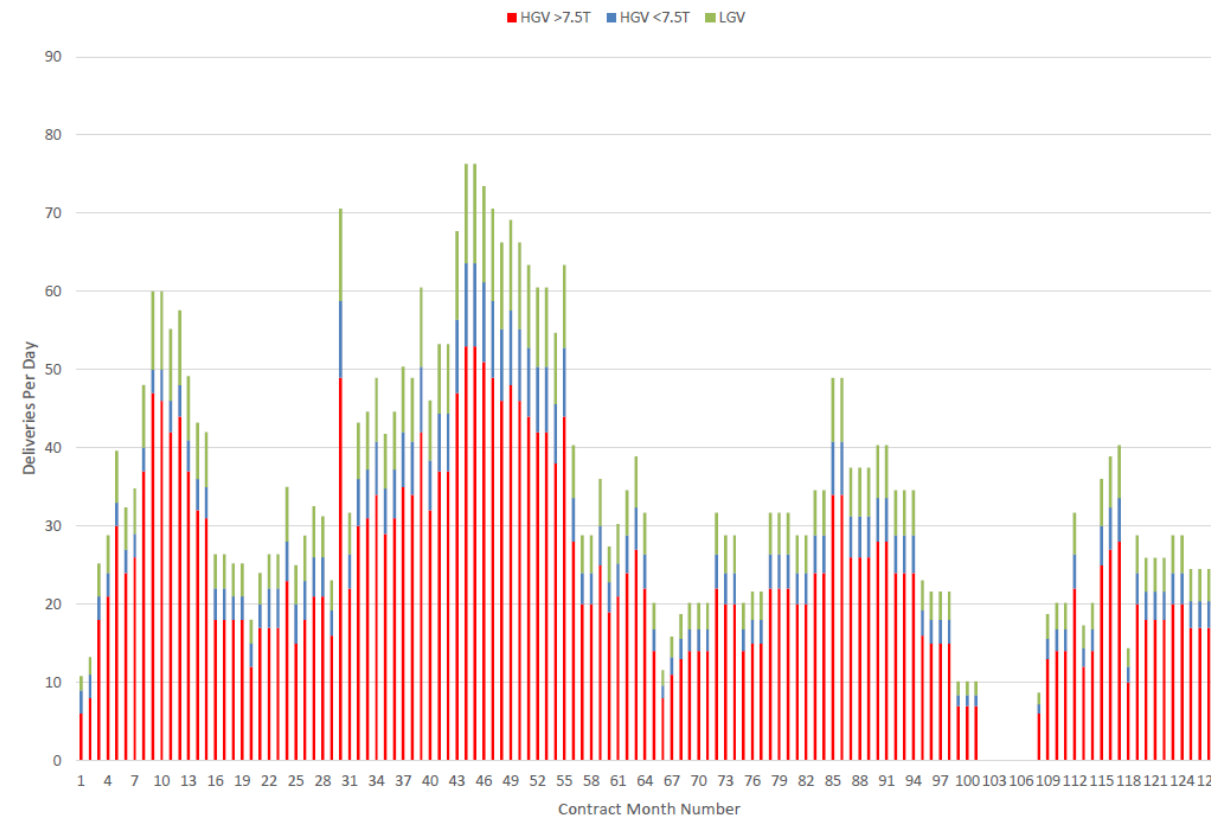
Programme

- 1.34 The October 2021 ES set out a programme with works relating to the underpass connecting Jolly's Green to the east of the site occurring across a 12-month period (Q1 Year 6 and Q4 Year 6). The landscaping works for Jolly's Green will occur across a 7-month period (Q2 Year 6 to Q4 Year 6). The works relating to Jolly's Green and the underpass will all occur within Phase B. A revised Indicative Demolition and Construction Programme has been appended to this ES Addendum (**Appendix 4**).

Demolition and Construction HGV/LGV forecast

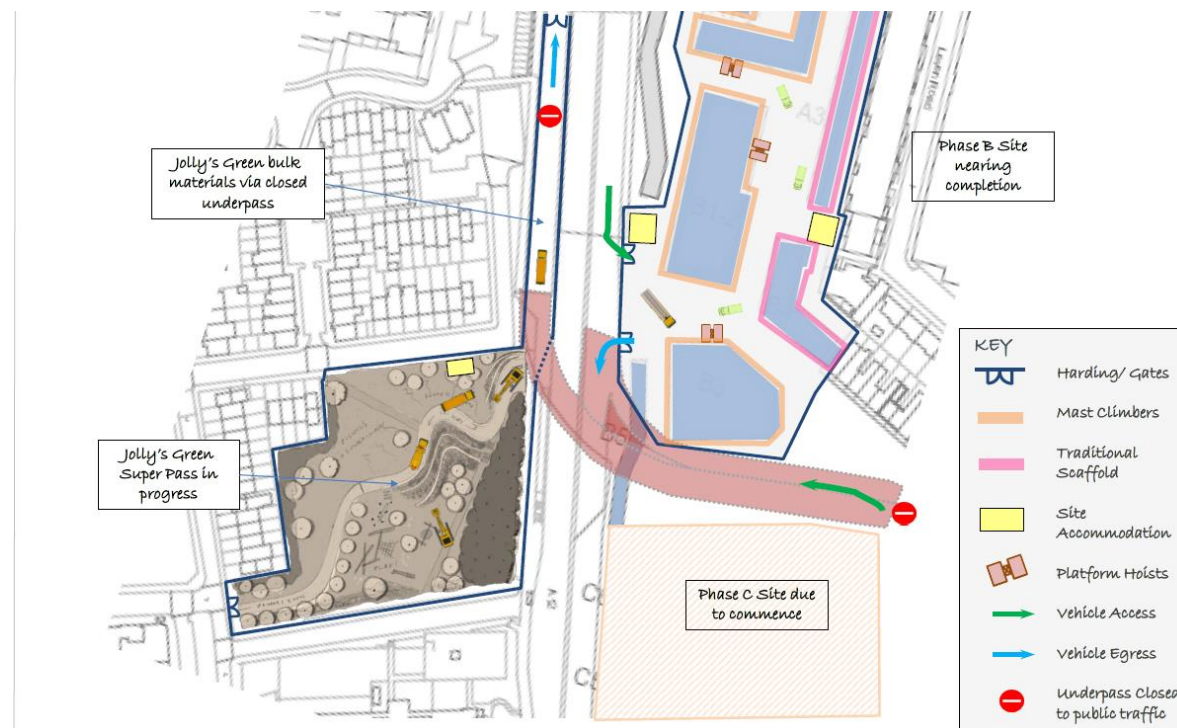
- 1.35 The October 2021 ES included an estimated peak number of vehicles across the programme – shown in Figure 5.15 of the October 2021 ES. The number of vehicles accessing the site (two-way trips) was estimated according to each of the defined stages of the programme.
- 1.36 It is noted that additional vehicles associated with the landscaping and works to the underpass could change the split across the years as presented in **Figure 1.1**. However, the October 2021 ES considered the peak number of vehicles – this was estimated to peak during months 44 and 45 of the construction period. This peak equates to 64 HGVs per day, or 98 vehicle movements. Works relating to the Jolly's Green underpass are expected to occur between months 60 and 72, the additional vehicles associated with Jolly's Green underpass will therefore not change this peak. The increase in waste quantities could affect (increase) vehicle numbers – however this change is considered to be very small, and therefore it is considered appropriate to continue to assess the peak included in the October 2021 ES, as a reasonable worst-case scenario.

Figure 1.1 Aberfeldy Village HGB/LGB Forecast – Amended Proposed Development



Drawing

1.37 The October 2021 ES (*Volume 1, Chapter 5: Demolition and Construction*) included a description of the following roads and footpaths that are likely to be affected and possibly the subject of future Temporary Traffic Regulation Orders and/ or Hoarding & Scaffold Licence Applications within the Construction & Demolition areas indicated in Figure 5.3 to Figure 5.13 of Chapter 5. An updated Figure 5.10 of Chapter 5 of the October 2021 ES is provided below.



Quantum / Materials

1.38 The waste quantities generated will be increased as a result of the increase in size of the redline and the Proposed Amendments. To address this, a revised 'Estimates of Key Construction Quantities' (Table 5.3 of Chapter 5 of the October 2021 ES) has been included below – the changes are shown in green with strikeouts used to indicate the previously presented information.

Materials Delivered	Quantities
Concrete in Piles	17,259m ³
Concrete to foundations and substructures	6,100m ³
Concrete in Superstructures	74,100m ³
Substructure Rebar	6,300T 6,350T
Superstructure rebar	8,800T
Structural Steel	4,020T 1,030T
Façade Cladding and Glazing	88,500m ²
Roof finishes	9,545m ²
Blockwork Walls	126,100m ²
Internal Walls	201,990m ²
Ceilings	11,590m ²
Wall Finishes	264,500m ²
Floor Finishes	62,000m ²
Hard and Soft Landscaping	5,300m² 6,500m ²

1.39 Arisings from excavations of basements, foundations and groundworks have increased from 21,300m³ and are estimated to be in the order of 23,250m³.

Review of Scope of the EIA

1.40 Having considered the Amended Proposed Development, a review of the scope of the EIA was undertaken. In light of these changes the following topics previously scoped out of the EIA were re-considered:

- Ecology:** A Phase 1 preliminary site survey has been undertaken for the additional area (Jolly's Green). Jolly's Green is dominated primarily by amenity grassland with a band of woodland along the A12. The survey identified low potential for bat roosting and foraging bats given the location being well lit. Jolly's Green is not subject to any statutory or non-statutory designations. The Amended Proposed Development is therefore considered unlikely to result in significant effects and the topic of 'ecology' continues to be scoped out of the ES. An addendum to the previously submitted Preliminary Ecology Appraisal is being submitted to the LBTH and has been included within **Appendix 4**.
- 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. The full Daylight and Sunlight Amenity within the Site Report was submitted alongside the October 2021 planning application and summarised within the Daylight, Sunlight, Overshadowing ES Chapter. This approach was previously agreed with LBTH within the Scoping Opinion received on the 8th September 2021. A review of the proposed revised design of Blocks A and D of the Ailsa Wharf development currently under consideration (ref. PA/22/00210/A1) was undertaken and it is not considered that the results of the daylight, sunlight and overshadowing assessments within the Proposed Development would change significantly from those previously reported.
- Geoenvironmental (Ground Conditions, Groundwater and Land Take and Soils):** The Preliminary Geo-Environmental and Geotechnical Risk Assessment has been reviewed to consider the Amended

Proposed Development, no changes have been required, with the risk to construction workers, future site users, neighbours and resources such as groundwater, remaining low to moderate. It is therefore considered that through the use of standard mitigation and monitoring measures, this topic can remain scoped out of the ES. This approach was previously agreed with LBTH within the Scoping Opinion received on the 8th September 2021.

- **Project Vulnerability:** The extension of the redline has no repercussions in terms of Project vulnerability. As such, the justification for scoping out Major Accidents and Disasters remains as out set out within the October 2021 ES.
- **Waste:** The extension of the redline has no repercussions in terms of Waste. As such, the justification for scoping out Waste remains as out set out within the October 2021 ES.
- **Materials:** The extension of the redline has no repercussions to the justification provided for scoping out materials assessment and an associated chapter. As such, the justification for scoping out materials remains as out set out within the October 2021 ES.

Review of Technical ES Chapters

Socioeconomics (Chapter 6)

- 1.41 Consideration has been made to the changes to the Amended Proposed Development and the corrections set out above, and these are not considered to result in any changes to the conclusions of **ES Volume 1, Chapter 6: Socio-economics** of the October 2021 ES.
- 1.42 The following changes are expected to result from the additional cumulative schemes discussed above:
- **Housing Targets** – Considering the additional cumulative schemes discussed earlier in this document, the Amended Proposed Development alongside cumulative schemes would result in the delivery of circa 18,500 new residential units, up from 17,200 previously reported. This would represent an increase of 172% over the current baseline within the LIA rather than 154% as previously reported and 18 % rather than 16% over the current baseline at a borough level. As such the effect (**Major Beneficial, Significant**) on housing targets will remain as presented within the October 2021 ES.
 - **Population and Labour Market** – The additional dwellings delivered by the Amended Proposed Development and cumulative schemes will accommodate 42,960 residents an increase of 2,360 above the 40,500 previously reported. The LIA's population will therefore increase by 101% rather than 95%, at a borough level this equates to 13% rather than 12%. As such the effect (**Major Beneficial, Significant** at a LIA level and **Moderate Beneficial, Significant** at a borough level) on the population and labour market will remain as presented within the October 2021 ES.
 - **On-Site Employment** – The Amended Proposed Development and cumulative schemes will have the potential to support between 40,500 and 43,500 FTE jobs once operational an uplift from previous values of 40,000 and 43,000. The increase in net additional jobs is estimated to represent an increase of around 407% - 437% over the current baseline within the LIA, an uplift from the previous range of 400% to 430%. As such the effect (**Major Beneficial, Significant** at a LIA level and **Moderate Beneficial, Significant** at a borough level) on On-Site Employment will remain as presented within the October 2021 ES.
 - **Off-site/ Wider Employment** - A further 20,300 - 21,900 jobs have potential to be supported indirectly off-Site an uplift from the previous range of between 20,000 -21,500. Together, the direct and indirect jobs supported add up to over 65,400 additional jobs an uplift from previous values of 64,000 additional jobs. As such the effect (**Minor Beneficial, Not Significant**) on/off site / wider employment will remain as presented within the October 2021 ES.
 - **Local Economy, increased local expenditure** – The Amended Proposed Development and cumulative schemes will generated an annual household expenditure totalling around £451 million an increase over the £411 million. As such the effect (**Major Beneficial, Significant**) on Local Economy due to increased local expenditure will remain as presented within the October 2021 ES.
 - **Local Economy, increased GVA** – The increase in on-Site employment delivered as part of the Proposed Development and cumulative schemes would result in an additional 40,500-43,500 gross FTE jobs an uplift from 40,000-43,000 gross FTE jobs. These additional jobs have the potential to generate

£5.5b in gross GVA an increase above the previous values of £5b in gross GVA. As such the effect effect (**Major Beneficial, Significant** at a LIA level and **Moderate Beneficial, Significant** at a borough level) on local economy due to increased GVA will remain as presented within the October 2021 ES.

- **Community and Leisure Centres** – The increase in local population will see demand for community centres within the LIA increase. The baseline assessment identified there is currently one community centre per 6,000 population within the LIA. The additional population of 42,960 (up from 40,500) new residents is going to significantly increase the demand (with over 600%). However, as part of relevant mitigation measures, the majority of cumulative schemes are contributing to the delivery of new community and leisure space across the LIA – over 37,900m² (up from 36,000 m²) of community floorspace will be provided as part of the delivery of the cumulative schemes. As such the effect (**Minor Beneficial, Not Significant**) on community and leisure centres will remain as presented within the October 2021 ES.

- 1.43 Changes to the ecology assessment, urban greening factor and design and access statement, have resulted in minor changes to the HIA in addition to those described above within the socio-economic assessment. An updated HIA capturing these revisions will be submitted, however, the conclusions of the HIA remain as stated within the October 2021 HIA.

Traffic and Transport (Chapter 7)

- 1.44 Consideration has been made to the changes to the Amended Proposed Development and the corrections as set out above, and these are not considered to result in any changes the conclusions of **ES Volume 1, Chapter 7: Traffic and Transport** of the October 2021 ES.
- 1.45 The change of use of the underpass has been identified as having a Major beneficial effect on severance for Pedestrians and Cyclists, which are identified as receptors with High sensitivity. As the benefit has already been identified as Major Beneficial (**significant**) there is no scope to further improve the effect.
- 1.46 In terms of delay for pedestrians and cyclists, it had already been identified that the effect would not be significant due to the existing pedestrian subway adjacent to the underpass. The inclusion of Jolly's Green is considered beneficial however, it would not change the magnitude of the effect.
- 1.47 As such, no change to the significance of effects reported in the October 2021 ES is likely to arise in relation to Traffic and Transport due to the Amended Proposed Development.

Air Quality (Chapter 8)

- 1.48 Consideration has been made to the changes to the Amended Proposed Development and the corrections as set out above, and these are not considered to result in any changes the conclusions of **ES Volume 1, Chapter 8: Air Quality** of the October 2021 ES.
- 1.49 Given that the nearest residential receptors of the Proposed Development have not changed since the October 2021 ES, it can remain that, with the implementation of the recommended mitigation measures including standard mitigation controls secured via a CEMP, no additional significant effects would arise regarding air quality during demolition and construction.
- 1.50 Therefore it is considered that no changes are anticipated to the significance of effects likely to arise in relation to air quality due to the Amended Proposed Development, as reported in the October 2021 ES.

Climate Change (Chapter 9)

- 1.51 The Climate Change chapter of the October 2021 ES has been reviewed in the context of the Amended Proposed Development to determine if the conclusions of this assessment remain valid. As with the other topics any updates and/ or changes to the baseline, legislation, planning policy and guidance and assessment methodology have been reviewed. Since the submission of the planning application, IEMA published new

guidance in February 2022², as a result minor adverse effects are no longer considered significant. A climate change note to support this has been produced and provided within **Appendix 4**.

1.52 The Amended Proposed Development has been reviewed and they do not alter the assessment as presented in the October 2021 ES. Consideration has also been given to the four additional cumulative schemes. As set out within the October 2021 ES, the residual cumulative GHG emission from the cumulative schemes and Proposed Development will likely be small in the context of regional and national GHG emissions, but as part of the wider cumulative effects of GHG emissions from all local, regional, national, and global sources. In addition, each cumulative scheme will prepare their own Whole Life-Cycle Carbon Assessments, Sustainability Statements, Energy Strategies, Transport Assessments and Travel Plans which will set out mitigation in accordance with national, regional and local policy to reduce the magnitude of greenhouse gas emissions.

Noise and Vibration (Chapter 10)

1.53 Given that the nearest residential receptors of the Proposed Development have not changed since the October 2021 ES, it can remain that, with the implementation of the recommended mitigation measures includes standard mitigation controls secured via a CEMP, no additional significant effects would arise regarding noise and vibration.

1.54 The Proposed Amendments will not increase the proposed car parking spaces proposed, it is unlikely that additional vehicle movements associated with either the construction or occupation of the Amended Proposed Development would result in any significant noise effects to existing receptors.

1.55 Additionally, as demonstrated in the updated Transport Assessment produced by Velocity, any small changes in local traffic flow would not have the potential to increase the already elevated level of noise in the local area due to constant traffic on the A12.

1.56 It is assumed that reasonable planning conditions will be imposed on any planning decision relating to this development or subsequent reserve matters applications, relating to background noise levels, emergency generators, sound insulation and anti-vibration mounts and silencing of machinery are unlikely to change for the Amended Proposed Development. These would mitigate any significant adverse effects with relation to noise and vibration. Planning conditions relating to plant noise are to be discharged prior to installation.

1.57 No change to the significance of effects is therefore likely to arise in relation to noise and vibration due to the Amended Proposed Development.

Archaeology (Chapter 11)

1.58 The revised archaeology chapter has been reviewed in the context of the Amended Proposed Development to determine if the conclusions of this assessment remain valid. In addition, consideration has been given to the response received from GLAAS (dated 14/02/2022) and the associated points raised in the IRR. As such a replacement Chapter 11: Archaeology to the October 2021 ES is provided in **Appendix 1**. An updated Desk Based Assessment report and a Geo-archaeological Model report are also provided within **Appendix 2**. Amendments to these assessments are also reflected in the subsequent Effect Interactions and Likely Significant Effects sections below and in the updated NTS within **Appendix 3**.

1.59 Previously the October 2021 ES noted that once appropriate mitigation measures are adopted, there are no predicted significant effects from the Proposed Development on archaeological assets within the Site. However, MOLA's revised assessment has noted that following the implementation of a programme of mitigation approved by the GLAAS, there would remain significant residual effects from the proposed piling and basement construction for extensive strata of peat or other organic materials and prehistoric cut features, revetments, etc. All other effects on the remaining identified assets are anticipated to be not significant.

Water Resources, Drainage and Flood Risk (Chapter 12)

1.60 The Water Resources, Drainage and Flood Risk chapter of the October 2021 ES has been reviewed in the context of the Amended Proposed Development to determine if the conclusions of this assessment remain valid. In addition, consideration has been given to the initial responses received from the GLA (dated 22/12/21) and the GLA stage 1 report (dated 07/03/22), the Environment Agency (dated 21/12/21) and the associated points raised in the IRR. As such a replacement Chapter 12: Water Resources, Flood Risk and Drainage to the October 2021 ES is provided in **Appendix 1**, in addition to an updated Flood Risk Assessment and Drainage

Strategy provided in **Appendix 2**. Amendments to this assessment are also reflected in the subsequent 'Conclusions' section below and in the Updated NTS.

1.61 Within the revised chapter the following updates have been made:

- Inclusion of an assessment of dewatering impacts on ground water;
- Consideration of piling impacts prior to the implementation of mitigation (i.e. a piling risk assessment);
- Consideration of sewer flood risk;
- Updates to the Drainage Strategy and Flood Risk assessment;
- Clarification on the significant beneficial effects on flood risk to site occupants and off-site receptors; and
- Consideration of cumulative effects on ground water (in conjunction with other cumulative schemes in the area).

1.62 It is considered that no changes are anticipated to the significance of effects likely to arise in relation to water resources, drainage, and flood risk due to the Amended Proposed Development.

Wind Microclimate (Chapter 13)

1.63 The Wind Microclimate chapter of the October 2021 ES has been reviewed in the context of the Amended Proposed Development to determine if the conclusions of this assessment remain valid. The following clarifications have been made as a result of the review:

- The Amended Proposed Development would be unlikely to substantially influence wind conditions at Jolly's Green, however, the proposed reduction in trees along the eastern boundary of the space would be expected to increase windiness relative to those in the context of the current Site when winds are blowing from north-easterly directions. Wind conditions on Jolly's Green will be quantified through further testing at RMA stage, with input to the landscaping and tree planting proposals, as necessary.
- Wind conditions in the assessed and the proposed Plot F play spaces would be similar throughout the year. As such, no additional significant effects are anticipated, and the outcomes of Chapter 13 of the October 2021 ES remain valid.

Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare (Chapter 14)

1.64 The Daylight, Sunlight, Overshadowing chapter of the October 2021 ES has been reviewed in the context of the Amended Proposed Development to determine if the conclusions of this assessment remain valid. In addition, consideration has been given to the associated points raised in the IRR (and in the separate Delva Patman report). As such a replacement Chapter 14: Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare to the October 2021 ES is provided in **Appendix 1**. Amendments to this assessment are also reflected in the subsequent 'Conclusions' section below and in the Updated NTS.

1.65 Within the revised chapter the following updates have been made:

- A qualitative assessment of light pollution has been included at paragraphs 14.639 -14.641 (in response to IRR Ref. 57).
- Table 14.11 Residual Effects has been updated to capture the qualitative assessment of potential solar glare and light pollution effects for the outline components of the Proposed Development.
- The Likely Significant Effects summary has been updated to include the potential solar glare and light pollution effects for the outline components of the Proposed Development.
- Amended paragraph references to those which have shifted as a result of additional text provided in this updated ES.

1.66 The changes to the chapter centre around the consideration of light pollution from the Outline Proposals. A qualitative assessment of the outline Plots A-E has been undertaken in relation to light pollution. At this stage, a technical assessment cannot be undertaken, as the detailed design is not yet known. The future detailed

² IEMA, 2022. 'Assessing Greenhouse Gas Emissions and Evaluating their Significance', 2nd Edition

design (and associated lighting) of buildings coming forward within Plots A-E at the RMA stage would be designed with respect to the ILP Guidance Notes to ensure that any significant effects are mitigated. A full detailed light pollution assessment secured by reasonable condition will be undertaken at this stage, resulting in negligible residual effects on light pollution.

Chapter 15 Effect Interactions

- 1.67 As a result of inclusion of the Geoarchaeological Report additional effects are expected during demolition and construction works. The chapter has also been updated to reflect the changes to methodology and effect significance following IEMA new guidance². No additional effect interactions are expected to result and as such remain the same as those described in the October 2021 ES.

Likely Significant Effects (Chapter 16)

- 1.68 As a result of inclusion of the Geoarchaeological Report additional likely significant effects are expected during demolition and construction works. Unless stated below all other likely significant effects, are the same as those described in the October 2021 ES.
- **Archaeology (Prehistoric remains)** - Following the implementation of a programme of mitigation approved by the GLAAS, there would remain significant residual effects between Negligible (not significant) to Moderate Adverse (**significant**) from the proposed piling and basement construction for extensive strata of peat or other organic materials and evidence of prehistoric occupation, e.g., cut features, revetments, fishtraps, jetties, revetments etc.

- 1.69 Once the Amended Proposed Development is fully complete and occupied, the likely significant effects are the same as those described in the October 2021 ES.

Mitigation and Monitoring Schedule (Chapter 17)

- 1.70 Consideration has been made to the changes to the Amended Proposed Development and Revised ES Chapters. These Revised ES Chapters are not considered to result in substantial changes to the schedules presented within **ES Volume 1, Chapter 17: Mitigation and Monitoring Schedule** of the October 2021 ES.

- 1.71 The following additional archaeological mitigation and monitoring measures are anticipated:
- The most appropriate form of archaeological evaluation could comprise a geoarchaeological purposive borehole survey followed by archaeological evaluation trenches based on the results of the survey. This will help confirm the extent, nature and significance of archaeological remains within each area of development. The results of the evaluation will enable an informed decision in respect of an appropriate mitigation strategy for any significant archaeological assets. This might comprise targeted excavation for remains of high or medium significance, a watching brief during ground works to ensure that archaeological assets of lesser significance are not removed without record or no further work.
 - A public engagement strategy will most likely comprise one or a combination of the following: Presenting the history of the site and area, as well as the results of the archaeological investigation on the demolition and construction hoarding; and/or presenting the history of the site and area, as well as the results of the archaeological investigation on a permanent public display board; and/or one or two archaeologists would share information through social media about the archaeological story unfolding from the site in the form of short stories; and
 - Any archaeological work, including any public engagement, would need to be undertaken in accordance with an approved Written Scheme of Investigation (WSI).

- 1.72 Given the altering of the archaeological mitigation and monitoring measures, the following two have been removed:
- Any work would need to be undertaken in accordance with an approved Written Scheme of Investigation (WSI), approved by the Greater London Archaeology Advisory Service (GLAAS) compliant with the relevant 'Standards and Guidance' issued by the Chartered Institute for Archaeologists. Such fieldwork should also be monitored by GLAAS; and
 - Prior to any works on-site, archaeological mitigation measures will need be secured, as are detailed below.

Townscape, Visual, Impact Built Heritage Assessment (Chapter 14)

- 1.73 Consideration has been made to the changes to the Amended Proposed Development and the corrections set out above, and these are not considered to result in any changes to the conclusions of **ES Volume 2, Townscape, Visual, Impact Built Heritage Assessment** of the October 2021 ES.
- 1.74 Four additional cumulative schemes have been identified for inclusion within the ES Addendum. These additional cumulative schemes have been incorporated within an updated cumulative ZVI image (provided within **Appendix 4**). Having reviewed the ZVI the assessment the conclusions of the October 2021 TVIHA remain valid in the context of the updated cumulative condition.