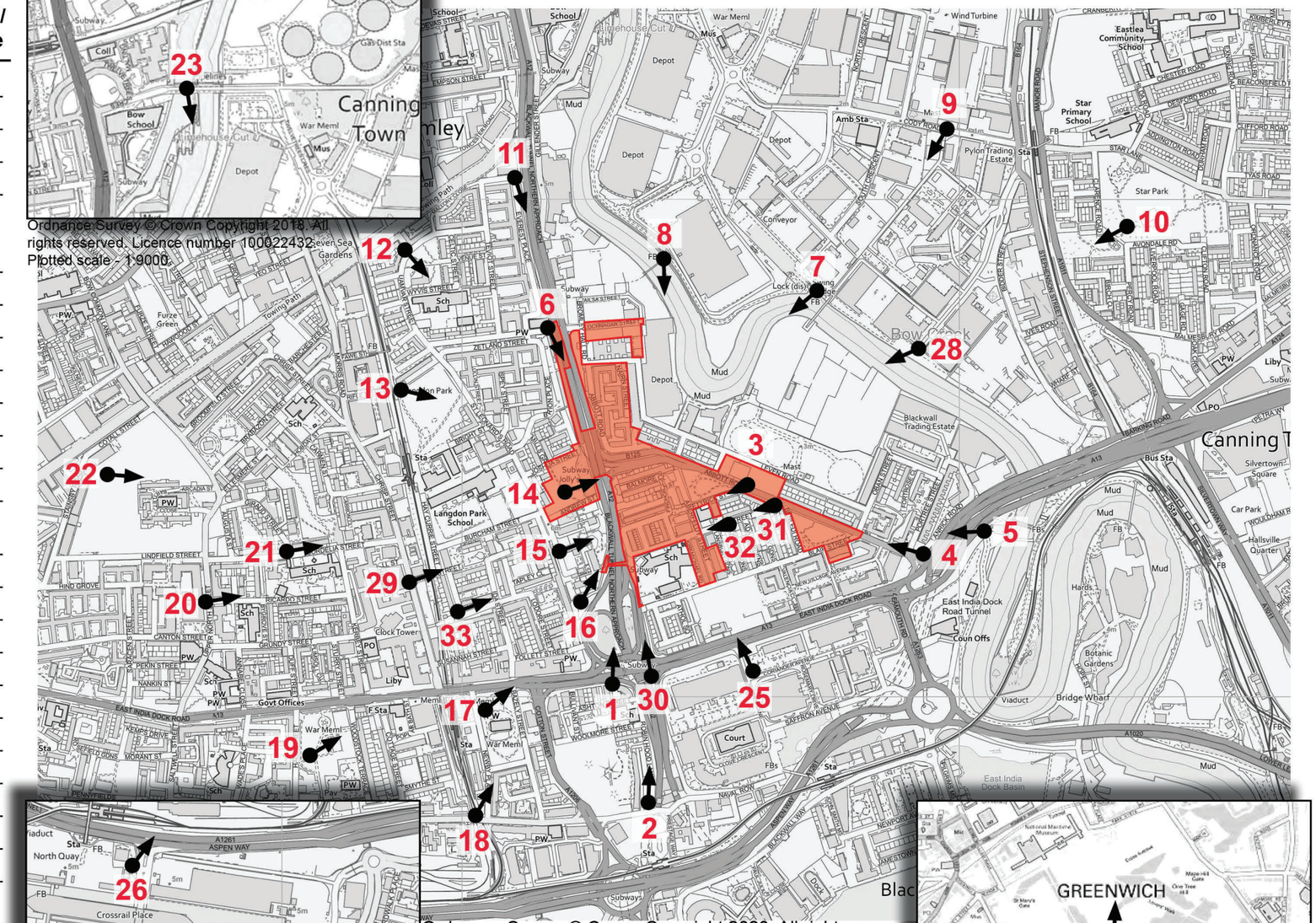
PSC view no.	Location	Render / Wireline
1	South of East India Dock Road	W
2	Junction of A102 and Poplar High Street	W
3	Abbott Road / Ettrick Street	R+W
4	Abbot Road, junction with East India Dock Road	W
5	LBTH borough designated view 6: View from East India Dock Road to Balfron Tower & Canary Wharf in the back-ground	W
6	A12, junction with Zetland Street	R+W
7	Riverside footpath north of River Lea / Bow Creek	W
8	Bow Creek River Lea bridge	W
9	Cody Road	W
10	Star Lane Park	W
11	A12, junction with Teviot Street	W
12	Uamvar Street	W
13	LBTH borough designated view 5: View from Langdon Park to Balfron Tower & Canary Wharf in the background	W
14	Jolly's Green	W
15	St Leonards Road	W
16	Pedestrian path from A102 / St Leonards Road	W
17	All Saints Churchyard, inside west entrance gates	W
18	Poplar High Street, bridge over railway tracks	W
19	Poplar Recreation Ground	W
20	Upper North Street	W
21	Cordelia Street	W
22	Bartlett Park	W
23	Twelvetrees Crescent, bridge over River Lea and Bow Creek	W
24	LVMF 5A.1 – Greenwich Park: the General Wolfe statue – at the orientation board	W
25	Nutmeg Lane	W
26	Upper Bank Street	W
27	Trafalgar Way	W
28	Bidder Street / Bow Creek	W
29	Chrisp Street, looking along Willis Street	W
30	A12, junction with East India Dock Road, looking north	W
31	Dee Street / Abbott Road	R+W
32	Dee Street, midway	R+W
33	Brownfield Street, outside no.30	W



Notes:

Viewpoint locations are approximate - exact locations, taking into account conditions on the ground, to be determined on site with PSC.

Approximate site boundary marked in red for indicative purposes only.

Where a view type is indicated as 'R+W', buildings applied for in detail will be illustrated in rendered form, and buildings applied for in outline will shown in wireline form.

PETER STEWART CONSULTANCY

Aberfeldy Village
Draft viewpoint map for Townscape and Visual Impact Assessment

Revision no: 8
Date: July 2021

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Appendix: Methodology

Annex 1: EIA Scoping Report
Annex 2: EIA Scoping Opinion
Annex 3: EIA Scoping Opinion Response
Annex 4: Cumulative Schemes List and Map
Annex 5: Cumulative Schemes Assessment Matrix

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Clare.Richmond@towerhamlets.gov.uk

8 September 2021

My ref: PA/21/01820

Dear Holly Farrow,

Environmental Impact Assessment Scoping Opinion
The Town and Country Planning (Environmental Impact Assessment) Regulations 2017(as amended)

Location: Aberfeldy Estate, Abbott Road, Land to the north of East India Dock Road (A13) London E14

Proposal: Request for an Environmental Impact Assessment (EIA) Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), in respect of a hybrid planning application for the demolition of existing buildings and the redevelopment of the site to comprise approximately 1,600 residential units, 7,500sqm of non-residential uses, new and improved access arrangements, associated servicing and landscaping, and public open space. Full planning permission will be sought for approximately 270 residential units and 2,500sqm of non-residential uses.

Please find attached the London Borough of Tower Hamlets' Environmental Impact Assessment (EIA) Scoping Opinion under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for the proposed development.

Please note that the Environmental Statement (ES) will form part of the planning application relating to the proposed development, and as such the planning application cannot be validated until the Council is in receipt of the ES.

If you require any further assistance, please do not hesitate to contact the EIA Officer (Clare Richmond) on telephone 020 7364 3620 or email Clare.Richmond@towerhamlets.gov.uk.

Yours sincerely,

Jennifer Peters, Divisional Director, Planning and Building Control

EIA SCOPING OPINION UNDER

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED)

In respect of the:

Request for an EIA Scoping Opinion as to the information to be contained within an Environmental Impact Assessment in support of a hybrid planning application for the demolition of existing buildings and the redevelopment of the Application Site to provide approximately 1,600 residential units, 7,500sqm of non-residential uses. Full planning permission will be sought for approximately 270 residential units and 2,500sqm of non-residential uses. PA/21/01820/NC.

Located at:

Aberfeldy Estate, Abbott Road, Land to the north of East India Dock Road (A13), London, E14

Adopted by:

LONDON BOROUGH OF TOWER HAMLETS

FOREWORD

This opinion has been prepared by the London Borough of Tower Hamlets with all reasonable skill, care and diligence.

It is based on the information provided to London Borough of Tower Hamlets on behalf of the Applicant and the comments and opinions resulting from consultation with internal/external consultees prior to adopting this opinion.

The fact that London Borough of Tower Hamlets has given this opinion shall not preclude them from subsequently requiring the developer to submit further information in connection with any submitted development application to the Council.

1. INTRODUCTION

1.1 Context

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (hereafter referred to as 'the EIA Regulations') require that for certain planning applications, an Environmental Impact Assessment (EIA) is undertaken, and an Environmental Statement (ES) produced.

EIA is a procedure which serves to provide information about the likely effects of a proposed project on the environment, so as to inform the process of decision-making as to whether the project should be allowed to proceed, and if so on what terms.

Schedule 1 of the EIA Regulations lists developments that always require EIA, and Schedule 2 lists developments that may require EIA if it is considered that they could give rise to significant environmental effects by virtue of factors such as its nature, size or location. Where a Proposed Development is determined to be an 'EIA development' the Applicant can ask the relevant planning authority for advice on the scope and content of the EIA (an EIA Scoping Opinion).

The Applicant has determined that the Proposed Development has the potential to generate significant environmental effects and therefore constitutes 'EIA Development'.

A request for an EIA Scoping Opinion was received by the London Borough of Tower Hamlets (LBTH) as the 'relevant planning authority' from DP9 on behalf of Ecoworld and Poplar Harca ('the Applicant') on 12th August 2021.

This requested an EIA Scoping Opinion for the demolition of existing buildings and the redevelopment of the Application Site to provide approximately 1,600 residential units and 7,500 square metres (sqm) Gross Internal Area (GIA) of non-residential floorspace, in buildings ranging from 7 m to 96 m in height; new and improved access arrangements; associated servicing facilities and ancillary plant space; associated landscaping; new vehicular access onto the Application Site, north of Blair Street and a new A12/Abbott Road junction, moved further north; and new public open space. Hybrid planning permission will be sought by the planning application, seeking full planning permission for approximately 270 residential units and 2,500sqm of non-residential uses.

The statutory 5-week deadline for the adoption of the EIA Scoping Opinion 16th September 2021.

This document constitutes LBTH's formal EIA Scoping Opinion.

1.2 Planning History

Paragraphs 33 - 37 of the Scoping Report present the planning history of the Application Site. It is noted that the Application Site has been subject to two planning applications, including:

- An outline planning application (PA/11/02716/PO) for the redevelopment of the existing Aberfeldy estate comprising:

  Outline planning application (all matters reserved) for the mixed-use redevelopment of the existing Aberfeldy estate comprising: Demolition of 297 existing residential units and 1,990 sq m of nonresidential floorspace, including shops (use class A1), professional services (use class A2), food and drink (use class A3 and A5), residential institution (use class C2), storage (use class B8), community, education and cultural (use class D1); and Creation of 1,176 residential units (Use Class C3) in 15 new blocks between 2 and 10 storeys in height plus 1,743sqm retail space (Use Class A1), professional services (Use Class A2), food and drink (Use Classes A3 and A5) and 1,786 community and cultural uses (Use

Class D1) together with a temporary marketing suite (407sqm), energy centre, new and improved public open space and public realm, semi-basement, ground and on-street vehicular and cycle parking and temporary works or structures and associated utilities/services

Outline Planning Permission (OPP) was granted in June 2012 and is hereafter referred to as the '2012 OPP';

- A full planning application (PA/11/03548) which was granted planning June 2012 for phase one of the Aberfeldy New Villages comprising:

  Erection of three blocks between 4 and 10 storeys on the corner of Abbott Road and East India Dock Road to provide 342 new residential units, 352 sq.m. new retail floorspace (Use Classes A1 and A3), a marketing suite of 407 sq.m. (Use Class A2), semi-basement and ground floor parking, cycle parking, landscaped public open space and private amenity space and other associated works.

  Proposal constitutes Phase 1 of application PA/11/02716.

- A minor material amendment application (PA/15/00002) which primarily sought permission for extending the development contained within the consented Phase 3 of the 2012 OPP to include sections of the consented Phase 4, increasing the maximum parameter heights of the buildings in Phase 3 by 2.5m (to allow for additional storeys to certain blocks, thereby enabling an increase in the number of dwellings in Phase 3 whilst not impacting upon the consented total number of residential units or floorspace brought forward across all 6 phases of the consented scheme), clustering the retail uses to the intersection between Aberfeldy Street and Blair Street, and expanding the floor area allocated to the community centre and health centre (to respond to projections of increased demand for these facilities). This application was granted planning permission in July 2015.

- Two reserved matters applications have been permitted for Phase 2 (PA/13/01844 - permitted on 27th March 2014), and Phase 3 (PA/15/01826 - permitted 13th November 2015) of the OPP as amended by the minor material amendment application. These comprised the following:

  PA/13/01844 - *Submission of reserved matters to condition 1 (details of siting, layout, scale, design and external appearance of the building, the means of access thereto and landscaping of the site) and condition 43 (reserved matters further information) for the development of Phase 2 of the Aberfeldy New Village Outline Planning Permission (PA/11/2716) approved on 20 June 2012 comprising demolition of Helen Mackay House, Jervis Bay House, Gaze House and Richie House and creation of two residential blocks between 4 to 8 storeys , with a total of 219 new dwellings (16 x studio; 97 x 1 bed; 92 x 2 bed; 7 x 3 bed; 2 x 4 bed; 5 x 5 bed), new public open space, car parks, cycle parking and temporary works of structures and associated utilities/services required by the development*.

  PA/15/01826 - *Submission of reserved matters pursuant to Condition 1 (details of siting, layout, scale, design and external appearance of the buildings, the means of access thereto and landscaping of the site), and partial approval of details pursuant to Condition 43 - (titled reserved matters further information) Sub-sections (a), (b) , (c), (d) (e), (f), (h) and (i) and partial discharge of Condition 25 (land contamination) Sub-Sections (a), (b),*

and (c) for the development of Phase 3 of the Aberfeldy New Village Outline Planning Permission (PA/15/00002) approved in June 2015 comprising demolition of Arapiles House, Athenia House, Jones House, Adams House, Sam March House, Theseus House and Trident House and creation of four residential blocks between 3 to 10 storeys, with a total of 344 new dwellings (21 x studio, 122 x 1 bed, 162 x 2 bed, 30 x 3 bed, 4 x 4 bed, 3 x 5 bed and 2 x 6 bed), a health centre facility, a pharmacy, a community/youth centre facility, retail spaces (618sq.m) and energy centre, public open space, car parks, cycle parking and new public open space, car parks, cycle parking and temporary works or structures and associated utilities/services required by the development.

For the purposes of this Scoping Opinion, the permissions above are collectively referred to as the 'OPP'. The Proposed Development would replace Phases 4 to 6 of the OPP, to provide a new residential-led mixed-use development. Phase 1 and 3 have been constructed or are under construction currently.

1.3 EIA Scoping Opinion

This EIA Scoping Opinion outlines LBTH's opinion on the proposed scope of the EIA (based on the information provided to date) and identifies any amendments and/or concerns.

In addition to the information provided by the Applicant, this EIA Scoping Opinion has had reference to the following:

- National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG);
- The London Plan (Greater London Authority (GLA), 2021);
- Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020);
- Institute of Environmental Management and Assessment (IEMA), Delivering Quality Development (2016);
- Consultation with internal LBTH consultees and external consultees;
- Relevant Application Site history, including the previous planning applications and permissions for the Application Site;
- Case law; and
- LBTH's interactive map.

Issuing this EIA Scoping Opinion does not prevent the planning authority from requesting "further information" at a later stage under Regulation 25 of the EIA Regulations.

No indication of the likely success of an application for planning permission for the Proposed Development is implied in the expression of this EIA Scoping Opinion.

Matters and aspect chapters are not considered to be 'scoped out' unless specifically confirmed by LBTH. Where LBTH has not accepted that certain matters or aspect chapters can be 'scoped out' of the assessment, the Applicant may agree with relevant consultees on the provision that further evidence has been provided to justify this approach. However, the ES should clearly explain the reasoning for scoping out such matters and aspect chapters, and justify the approach taken, and this will not prevent LBTH requesting further information at a later stage under Regulation 25 of the EIA Regulations.

It should be noted that the EIA Regulations require the ES to "*be based on the most recent Scoping Opinion or Direction issued (so far as the Proposed Development remains materially the*

same as the Proposed Development which was subject to that opinion or direction)". The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development as described in the Scoping Report.

It is recommended that the Applicant uses a table within the ES to demonstrate, how the ES has been based on this Scoping Opinion.

1.4 EIA Scoping Report Regulatory Requirements

Table 1.1 below assesses whether the request for an EIA Scoping Opinion meets the requirements as set out in the EIA Regulations (Regulation 15).

Table 1.1: Review of the request for an EIA Scoping Opinion in respect to the EIA Regulations

EIA Regulation Requirement	Requirement met in request for an EIA Scoping Opinion?
A plan sufficient to identify the land	Figure 1, Figure 2 and Appendix A of the Scoping Report.
A brief description of the nature and purpose of the development, including its location and technical capacity	A description of the Site and its context if provided in Paragraphs 23 to 31, Table 1 and Figure 3 of the Scoping Report. A description of the Proposed Development is provided in Paragraphs 38 to 50 of the Scoping Report.
An explanation of the likely significant effects of the development on the environment	An explanation of potentially significant environmental effects associated with the Proposed Development is provided in Paragraphs 127 to 385 of the Scoping Report.
Such other information or representations as the person making the request may wish to provide or make	As appropriate.

1.5 Report Structure

The contents of the remainder of this EIA Scoping Opinion are set out below:

- Section 2 details LBTH's understanding of the Proposed Development including demolition and construction;
- Section 3 reviews the overall approach to the EIA in the context of prevailing EIA legislation and guidance;
- Section 4 provides a review of the proposed scope and approach to each aspect proposed by the Applicant to be scoped in; and
- Section 5 considers those aspects proposed by the Applicant to be scoped out of the EIA.

1.6 Consultation

The EIA Regulations require that the local planning authority seeks the view of *"consultation bodies"* prior to issuing an EIA Scoping Opinion. LBTH has therefore consulted both internal and external consultees as part of the preparation of this EIA Scoping Opinion. The internal and external responses that have been received are integrated into the main text as appropriate, and the external responses are available on the LBTH's planning register using the following reference number: PA/21/01820.

Subsequent advice regarding the scope of the EIA and engagement with LBTH officers is provided through LBTH's pre-app service, subject to the relevant officer's availability.

1.7 Submission Documents

In accordance with the temporary Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020, it may not be reasonably practicable to make a hard copy of the ES available to the public at the time of submission of the planning application, for reasons connected to the effects of coronavirus, including restrictions on movement. In addition, during this time, a hard copy does not need to be provided to LBTH's EIA Consultants.

However, LBTH require agreement that a hard copy of the ES will be submitted to LBTH should it be reasonably practicable to make a hard copy available to the public during the assessment of the planning application.

In addition, as the submission date of this planning application is not known, nor is the nature and duration of restrictions on movement as a result of coronavirus, LBTH reserves the right to require the following at any time during the application process and within reason:

- A copy of the ES, both as a hard copy and an electronic copy. A minimum of one copy of the ES will need to be provided to LBTH; and
- A further copy (both hard and electronic) of the ES should be sent directly to the LBTH's EIA Consultants – address to be supplied separately on the request of the Applicant.

2. THE PROPOSED DEVELOPMENT

2.1 The Proposed Development

Paragraphs 38 to 50 of the Scoping Report describe the Proposed Development. The Proposed Development is understood to comprise the demolition of the existing structures on-site and the construction of a residential-led mixed-use scheme, in plots up to 96 m in height, providing:

- Approximately 1,600 residential units;
- Approximately 7,500 sqm GIA of non-residential uses, including restaurant, retail and office (Use Class E(a), E(b) and E(g));
- New and improved access arrangements, include pedestrianisation of Abbot Road vehicle underpass;
- Associated servicing facilities and ancillary plant space and associated landscaping;
- New vehicular access onto the Application Site north of Blair Street and a new A12/Abbott Road junction moved further north. The existing vehicular underpass is proposed to be converted into a pedestrian and cycle route, connecting Jolly's Green with the Application Site; and
- New public open space.

It is understood that the hybrid planning application will be based upon the following description of the Proposed Development:

- In outline: Demolition of existing buildings and the provision of:
    - Approximately 1,330 residential units;
    - Approximately 5,000 sqm GIA of non-residential restaurant, retail and office uses (Class E(a), E(b) and E(g));
    - New buildings up to 96 m in height;
    - Cycle and pedestrian routes through the Application Site;

- An approximately 1,200 sqm residents hub; and
- Internal vehicle access routes.

- In detail: Demolition of existing buildings and the provision of four residential areas comprising:
  - Approximately 270 residential units;
  - Building heights ranging between approximately 7 m and 42 m in height; and
  - Approximately 2,500 sqm GIA of non-residential restaurant and retail uses (Class E(a) and E(b)).

LBTH notes that the Proposed Development will also provide a new significant public open space at the centre of the Application Site between the A12 and Abbott Road, along with a number of smaller open spaces and a new public square in front of St Nicolas Church. Car parking is proposed to be provided within three podium car parks and on-street. Provision for electrical car charging points will also be made by the Proposed Development.

It is understood that the Application Site covers a total area of 9.69 hectares (ha) and is bordered by:

- Industrial areas and Ailsa Street to the north. Bromley Hall School is between two areas of the Application Site in the north;
- B125 Abbott Road and Leven Road to the east;
- Culloden Primary School and residential areas off Blair Street to the south; and
- The Blackwall Tunnel Northern Approach (A12), beyond which are residential areas.

It is understood the Application Site currently consists of 330 homes, a retail and commercial element (along Aberfeldy Street), Aberfeldy Neighbourhood Centre, Aberfeldy (GP) Practice, and an area of brownfield land. The Application Sites also comprises public realm, containing soft landscaping, Aberfeldy Millennium Green, Leven Road Green, Braithwaite Park, Jolly's Green and a hard standing Multi Use Games Area (MUGA).

2.2 General Comments

There are some uncertainties in the project description in the Scoping Report that should be addressed in the ES, as follows:

- Appendix A and Figure 1 of the Scoping Report provide the planning application boundary for the Application Site. However, some areas within the Application Site are labelled as 'land with the potential to be included in the application boundary'. For the avoidance of doubt this Scoping Opinion has been undertaken on the basis of the maximum extent of the Application Site as shown in Appendix A and Figure 1 of the Scoping Report. The ES should confirm the application boundary and any delivery mechanisms relied on to implement associated works within these areas should they not form part of the Proposed Development and Application Site. In addition it is noted that Paragraph 441 incorrectly states the Application States is 17.4 hectares.
- It is not understood whether affordable housing is intended to be provided as part of the Proposed Development. The ES should clearly set out what affordable housing is proposed and provide the relevant assessment.
- Paragraph 40 of the Scoping Report notes that the Proposed Development will provide car parking however the proposed quantity of car parking has not been provided. No

reference to cycle parking has not been made. The ES should clearly set out the number of car and cycle parking spaces proposed and provide the relevant assessment.

- It is unclear if basements form part of the Proposed Development, as although basements are referred to within the Scoping Report, these are not described within the description of the Proposed Development. The ES will need to outline the extent, depth and location of the proposed basements are including any below ground works. The maximum basement provision must be assessed accordingly in the ES including, for example, variations to site set-up, construction compound locations, materials arising, dewatering and traffic volumes.
- Where appropriate, the ES must assess the maximum parameters of the Proposed Development in accordance with the Rochdale envelope, and these parameters should be clearly set out and sufficiently secured within any given planning permission.
- The ES should also provide information on massing (including sections/elevations), the location of uses within the Proposed Development, the location and nature of public spaces and pedestrian routes, proposals for soft and hard landscaping including ecological enhancements, highway works, access and servicing arrangements, drainage strategy, waste management proposals, sustainability and climate change resilience measures.
- Where different floorspace measurements are used e.g. Gross External Area (GEA), General Internal Area (GIA) and Net Internal Area (NIA), the ES should clearly identify how these have been calculated, based on which drawings and how the figures relate to one another.
- The ES should ensure consequential effects of plant are assessed as required, in terms of flue location and noise.
- Soft landscaping should be prioritised within the Proposed Development which, where possible, should incorporate dual uses e.g. biodiversity benefits, flood attenuation/Sustainable Drainage Systems (SuDS), and wind mitigation.
- The Applicant should take into account the locations of any utilities within or crossing the Application Site; should these need to be redirected or upgraded as a result of the Proposed Development, consultation should be undertaken with the relevant stakeholders.

2.3 Demolition and Construction

The Scoping Report includes information on demolition and construction in Paragraph 49. The Scoping Report states the construction period is anticipated to take place over 120 months (i.e. 10 years) and that the demolition and construction programme to be assessed will be presented within the ES.

Paragraph 71 of the Scoping Report states that the ES (within a non-technical chapter titled 'Demolition and Construction') will include a description of the programme and anticipated related activities and aspects, such as the proposed demolition and construction works, demolition waste volumes and construction material quantities, construction traffic movements and construction traffic routing. It is expected that the demolition and construction chapter will also provide information regarding the anticipated durations of the methods of demolition and construction, site preparation and construction logistics (including site access and egress for construction vehicles), types and depth of piling and foundations likely to be employed and working hours.

Paragraph 72 of the Scoping Report states that this chapter will inform the demolition and construction assessments set out within each aspect chapter. LBTH consider this to be

appropriate.

The ES must detail the demolition and construction information that has formed the basis of assessment. This should include:

- A construction programme (including overlapping activity), proposed construction activities (including any remaining demolition and enabling works), typical plant and methods (including piling) and their anticipated durations;
- A phasing plan that clearly demarcates the locations of the two construction phases;
- The anticipated peak daily construction vehicle movements, construction traffic access and egress, and any temporary road, footpath or cycleway closures;
- The location of construction compounds, including a figure; and
- Information regarding any temporary road, footpath or cycleway closures over the demolition and construction period.

The demolition and construction programme should be sufficiently detailed in the ES to accurately inform the assessments.

Mitigation measures to avoid / reduce / offset adverse demolition and construction effects as far as possible are to be explored in each aspect chapter.

No reference to LBTH's Code of Construction Practice (CoCP) is made in the Scoping Report. Reference must be made to LBTH's CoCP in the ES which includes information on standard hours of working etc., which should inform the EIA.

No reference is made within the Scoping Report to the lifespan (or decommissioning) of the Proposed Development. The intended lifespan of the Proposed Development is to be considered in the ES.

Noting the 120-month construction period and as Paragraph 5 of the Scoping Report states that the Proposed Development would replace Phases 4 to 6 of the OPP, and Paragraph 86 of the Scoping Report refers to a phased construction and occupation of the Proposed Development, the Applicant should consider how a reasonable worst-case scenario can be identified and new sensitive receptors (i.e. residents) assessed and make clear how this has been considered. Any phasing as presented in the ES would then be fixed by planning condition.

The Proposed Development should include a description of any temporary works (noting the 120-month construction phase) required to facilitate any partial use of the Application Site, prior to completion of the Proposed Development.

An assessment has been carried out with respect to Cadent Gas Limited, National Grid Electricity Transmission and National Grid Gas Transmission. The searches identified apparatus in the vicinity of the Proposed Development. As such, the contractor should contact Plant Protection before any works are carried out to ensure the apparatus is not affected by any of the proposed works. The Applicant's attention is drawn to the consultation response from Cadent Gas in this regard.

3. REVIEW OF METHODOLOGY AND SCOPE OF THE EIA

This section comments on the overarching approach to the EIA, as described in the Scoping Report.

3.1 General Comments

In preparing the ES, the Applicant should be mindful of the requirement placed on LBTH as the

local planning authority by the EIA Regulations, in determining applications for EIA Development, LBTH must examine the environmental information to reach a reasoned conclusion on the significant effects of the Proposed Development on the environment. As such, the ES should include the information reasonably required by the planning authority to reach this reasoned conclusion.

The Applicant must ensure all guidance used is relevant, up to date and clearly referenced. A reference list detailing the sources used for the descriptions and assessments must be included in the ES.

The study area for each aspect should be clearly stated in the ES and fully justified. This should be supported by a figure for ease of understanding. It is noted that the study area for matters assessed within each aspect may differ, and where this applies, it should be clearly stated.

To support quality and completeness in the EIA process, Regulation 18(5) requires the developer to ensure that it is undertaken by competent experts. The ES must be accompanied by a statement that outlines the qualifications and relevant experience of the technical experts that have contributed to the ES, including the EIA project team as confirmed in Paragraph 11 of the Scoping Report.

In accordance with Schedule 4(3) of the EIA Regulations, each technical assessment within the ES should consider how the environmental baseline is likely to evolve should the Proposed Development not proceed i.e. the future baseline as confirmed in Paragraph 67 of the Scoping Report.

The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil, and subsoil pollution during the demolition / construction and operation phases, where relevant.

The ES must include a reference list that clearly states which documents / figures / drawings have been relied upon for the description and assessment included in the ES, and where these are located. It is also important for the ES to stipulate whether the information relied upon is for approval, or if it is for information purposes only (e.g. Design and Access Statement (DAS)). This is important so that the reader is aware what is secured through the planning application, and what would need to be secured through a planning condition and/or financial contribution.

The Applicant is advised to ensure that the Proposed Development assessed within the ES correlates to the planning drawings as there are often discrepancies which result in the requirement for clarification / potential Regulation 25 requests during the ES review process, for example different maximum heights stated between the planning application documents and the ES, and wind mitigation relied on in the ES not included within landscape drawings submitted for approval.

It is important that all aspect chapters of the ES assess the various elements of the Proposed Development consistently, where possible. It is acknowledged that in some instances the worst-case scenario may differ between aspect chapters, however this should be clearly stated and justified within the ES.

The ES should consider the effects of the Proposed Development on both existing and new receptors where significant effects are likely, including future site users. LBTH requires the sensitive receptors used in each assessment to be clearly identified throughout the ES.

Paragraphs 77 to 86 of the Scoping Report, which states that the assessment of the detailed part of the Proposed Development will be based on detailed design information (including, but not limited to, fixed area schedules, floor plans, layouts, elevations and massing) and the assessment of the outline parts of the Proposed Development will be based on the maximum amount of

development sought for approval. The worst-case scenario for each technical assessment is to be assessed and must be clearly outlined in the relevant aspect chapters of the ES and sufficiently secured within any given planning permission.

With a scheme of the size and scale of that proposed it is worth noting the responsibilities of the Applicant to provide sufficient information to allow for the determination of likely significant environmental effects at the time the planning application is determined.

Please note the following advice from the Planning Inspectorate on this "Rochdale Envelope" approach (advice note written for Development Consent Order projects, but relevant in this case):

"Establishing a robust worst-case scenario(s) for the purposes of assessment is a particular challenge where there is a large degree of uncertainty and extensive flexibility in the (application) is sought. Applicants should carefully consider the approach to assessing uncertainty and understand how this will influence the complexity of their assessment in the ES. The characteristics of the Proposed Development that are yet to be finalised should be clearly identified in the description of the development in the ES. The Applicant should consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the development in the ES must not be so wide that it is insufficiently certain to comply with requirements of the EIA Regulations".

(PINS Advice Note 9, para.4.12)

The ES must therefore be sufficiently detailed to provide a robust basis for assessment. The Applicant is reminded that the description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with requirements of the EIA Regulations.

It is considered that a part occupation and part construction assessment is undertaken i.e. interim construction, as referred to in Paragraph 86 of the Scoping Report.

It must be ensured that the worst-case scenario is assessed for each aspect, which may not be the maximum development scenario, for example some building orientations and designs within the maximum envelope may result in the worst effects on wind.

It must be ensured the assessments considers all locations within the Proposed Development which could provide residential accommodation, with regards to site suitability

The ES should include details of any assumptions, difficulties and any limitations encountered compiling the required information and the main uncertainties involved, such as technical deficiencies, lack of knowledge, or unavailable data.

In accordance with Schedule 18(3) of the EIA Regulations, the Applicant should provide a Non-Technical Summary that clearly summarises all aspects of the ES, not just the residual effects.

The Applicant is reminded of the requirement for all the relevant environmental information in an ES to be comprehensive and easily accessible, noting that the public are an intended audience of the ES and Non-Technical Summary. LBTH considers that sections should be provided in the ES to aid navigation and to ensure text, paragraph numbers, tables and figure headings are searchable in the pdf tool functions.

3.2 Significance Criteria

Table 2 of the Scoping Report provides an example of the general approach followed to determine 'resultant effects' i.e. the significance of effects, within the resulting ES. The matrix includes the classification that impacts of medium magnitude on assets of medium sensitivity, will result in a moderate effect. In general, LBTH considers that this classification is proportionate.

The ES should clearly state which effects are 'significant' and 'non-significant' for the purposes of the EIA, as provided in Paragraph 124 of the Scoping Report. However, Paragraph 124 of the

Scoping Report states this classification of significance is a general rule, and therefore it must be clear where this methodology is deviated from in the ES. The Applicant is reminded that the Non-Technical Summary of the ES must also state the effects which are considered to be significant, and ensure all likely significant effects are stated.

It is noted that individual aspect chapters will follow discipline specific methodology. All matrices for determining significance of effects are to ensure that the assessment of effects is representative and does not understate adverse or overstate beneficial effects. If aspect chapters deviate from the overall classification of effects, this is to be highlighted in the front end of the ES, for example if any aspect chapters consider minor effects to be significant.

The ES should clearly state how value / sensitivity of receptors and magnitude of impact have been classified within each aspect chapter of the ES e.g. resource value of each heritage asset.

In addition, it should be clearly stated in the ES where professional judgement has been applied and the justification for such judgement. It is essential that the pre-mitigation impact is reported in addition to the residual effect, to ensure the assumed effectiveness of any proposed mitigation can be understood.

The ES should clearly illustrate the effects identified. For example, highlighting the effect in bold can assist the reader in identifying the effects of the Proposed Development quickly and easily e.g. **minor adverse.**

Table 3 of the Scoping Report refers to classifying effects as adverse, beneficial, or neutral. LBTH consider that the classification of 'neutral' effects is to be used where there is no meaningful change to a receptor. However, LBTH do not consider it is appropriate to imply that neutral effects can be significant e.g. moderate neutral effect, as this counters the normal use of this word both in general usage and EIA practice. Although LBTH note that the Scoping Report only proposes to use the term neutral with regards to the Townscape and Visual Impact Assessment.

LBTH require at the end of each aspect chapter, a table is included summarising the impacts, mitigation measures and residual effects (i.e. results of pre- and post-mitigation assessments).

3.3 Alternatives Assessment

The Scoping Report states in Paragraph 109 that the ES will include consideration of the reasonable alternatives and the evolution of the design, and how environmental considerations influenced the design. The Scoping Report also states in Paragraph 68 that the ES will include consideration of the consequence of no development taking place on the Application Site (i.e. the 'do nothing' scenario).

LBTH expects a comprehensive consideration of alternatives to be undertaken as part of the ES, in accordance with the Scoping Report. LBTH also expect consideration to be given to how the Proposed Development compares to previous schemes (i.e. consented schemes) in terms of environmental effects.

LBTH expects that the evolution of the design will include an explanation of how the proposals have developed in response to initial EIA findings. With reference to Schedule 4(2) of the EIA Regulations, this should include a comparison of the predicted environmental effects of each of the design alternatives that have been studied and then rejected.

3.4 Mitigation / Monitoring

The ES should make clear how mitigation measures are to be implemented, and how they relate to the emerging design. Primary or embedded mitigation measures are encouraged and should be identified. Where mitigation should be secured by planning condition or section 106 agreement, this should be made clear. This is necessary to ascertain the reliance that can be placed on the residual effects identified, and the extent to which mitigation measures will be

effective, in accordance the EIA Regulations.

The Proposed Development should seek to enhance the Application Site and surrounding area, in accordance with LBTH policy, in addition to merely mitigating adverse effects. Mitigation will need to be identified to mitigate (avoid, prevent, reduce or off-set) all adverse effects, not just significant, as far as possible, and any beneficial effects enhanced as far as possible.

It is noted that Paragraph 75 and Paragraph 508 confirm a mitigation and monitoring schedule will be provided as part of the ES as a separate chapter. It is imperative that mitigation as outlined in the Scoping Report is secured within any given planning consent, which is particularly relevant for the mitigation relied upon to scope out certain aspect chapters from the ES. It is to be detailed within this chapter how measures are proposed to be secured; for example, embedded into planning drawings or by condition.

Paragraph 72 of the Scoping Report states that for the assessment of demolition and construction it will be assumed that '*standard environmental controls required under legislation and best practice guidance are met as a matter of course*'. The Applicant is advised to refer to relevant case law including, Squire R v Shropshire Council, 24 May 2019. Any relevant control mechanisms to mitigate adverse effects as far as possible are to be clearly stated in the ES.

3.5 Figures and Drawings

Plans and drawings submitted with the planning application are very important in helping the reader quickly and easily understand the Proposed Development and its effects.

The ES is to include figures and drawings presented with a high quality of graphics. It is preferable if key figures are presented in each aspect chapter that references them, and not located in Appendices. Any in-text figures should be provided at a readable scale, with legible notation and labelling. Colour palettes should also be appropriate to the scale of the figure and allow for accurate reproducibility at a page-size scale.

Any drawings that are referred to should be clearly cross-referenced, so that they are easy to locate within the submission.

It is considered helpful if the ES provides the following:

- A plan showing the extent of the study area and the location of the sensitive receptors (clearly labelled) relevant to each aspect chapter e.g. those properties surrounding the Application Site whose daylight and sunlight could be affected by the Proposed Development.
- A plan showing the location of any monitoring undertaken e.g. noise and vibration monitoring.
- A plan of the construction phasing (if appropriate).
- A plan of the operational Proposed Development (internal and external, as needed) showing those elements relevant/relied upon (specific to each discipline) e.g. location of entrances, amenity spaces, thoroughfares etc. for the wind assessment, or flue location for the air quality assessment.
- A plan showing the positioning/location of any necessary mitigation e.g. noise barriers.

4. REVIEW OF ASPECT CHAPTERS PROPOSED BY THE APPLICANT TO BE SCOPED IN TO THE ES

The Applicant is proposing that the following aspects are scoped into the ES:

- Air Quality;
- Climate Change;
- Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare;
- Noise and Vibration;
- Health;
- Socio-economics;
- Townscape and Visual Impact Assessment;
- Traffic and Transport;
- Wind Microclimate;
- Archaeology (Buried Heritage); and
- Built Heritage.

LBTH's comments on each proposed aspect chapter are provided below.

4.1 Air Quality

4.1.1 Proposed Approach

Paragraph 133 of the Scoping Report states that the Air Quality aspect chapter of the ES will include an assessment of effects from a temporary increase in dust generated by construction works; effects from an increase in particulate matter (PM_{10}) concentrations generated during demolition and construction works; effects from an increase in air pollutants (nitrogen dioxide (NO_2) and PM_{10}) generated by demolition and construction plant and vehicle exhaust emissions; and effects from the completed Proposed Development, due to emissions (NO2, PM10 and PM2.5) from road traffic and an energy centre / combined heat and power (CHP) (where one is proposed).

The Scoping Report also states that an Air Quality Neutral Assessment will be undertaken.

4.1.2 General Comments

For the avoidance of doubt the assessment of vehicle emissions is to include assessment of NO_2, PM_{10}, and $PM_{2.5}$, noting that $PM_{2.5}$ which is not referred to with regards to the demolition and construction assessment within the Scoping Report.

As stated in Paragraph 130 of the Scoping Report, the whole of the LBTH has been designated as an Air Quality Management Area (AQMA). This means that even small increases in emissions can lead to significant effects. It should also be noted that part of the Application Site is located within an area identified as having substandard air quality in LBTH, as shown within Figure 14 of Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020).

Given that the Application Site is adjacent to the Blackwall Tunnel Northern Approach and East India Dock Road, LBTH expects the applicant to consider the layout of the Proposed Development to limit the potential exposure to unacceptable air quality. This accords with the requirement to consider alternatives within EIA Regulations.

The ES is to ensure that realistic background air quality concentrations are used in the assessment, and a robust model verification exercise is undertaken. Any limitations should be clearly stated. It is considered that current baseline and future year projections are to be based on the LAEI (20 m^2 grid reference) and Tower Hamlets monitoring data. LBTH notes that in

addition to verifying modelling against existing monitoring data in the area, air quality monitoring for nitrogen dioxide will be undertaken at the Application Site (over a minimum period of three months), in order to provide further confidence in the modelled predictions. LBTH considers this to be appropriate.

Meteorological data from London City Airport should also be used to inform the assessment, along with the most recent local monitoring data.

The Scoping Report does not clearly state the scenarios will be assessed. For ease, these scenarios must be clearly differentiated (i.e. current baseline, future baseline, and opening year). The dispersion modelling must enable the future baseline with and without the Proposed Development to be understood, and in accordance with Paragraph 6.20 of the Institute of Air Quality Management (IAQM) guidance 'Planning for Air Quality' (2017), comparison should also be provided against the existing baseline. The ES should also include an assessment of the worst case (peak) demolition and construction effects, and an interim construction and operation effects of the Proposed Development.

The ES must ensure the spatial extent of the assessment of vehicle emissions is sufficient, to ensure the likely significant effects of the Proposed Development can be understood. There may be a requirement to obtain further traffic modelling beyond what is required to inform the traffic and transport, and noise and vibration aspect chapters of the ES.

The ES is to illustrate the location of air quality receptors, their use type (e.g. school, nursery, residential) and their sensitivity to poor air quality/changes in air quality. The ES should include a figure(s) showing the location of identified air quality receptors, as well as the background monitoring stations utilised in the assessment.

The ES shall have regard to the GLA Supplementary Planning Guidance (SPG) on Sustainable Design and Construction with regards to impacts on future users of the building and the impact of emissions from the building on both the Proposed Development itself and surrounding areas.

The Applicant should also have regard to the London Plan with particular reference to Policy SI 1, the London Mayor's Environment Strategy with particular reference to Policy 4.3.3a, with regards to new developments being 'air quality positive', and the air quality recommendations in the Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020) in particular policy ES2 - improving air quality.

An air quality neutral assessment should be carried out following the methodology outlined in the GLA Sustainable Design and Construction Supplementary Planning Guidance (SPG). In addition, the Air Quality Neutral Planning Support Update (2014) should be used to inform the assessment as referenced in the Scoping Report. The Air Quality Neutral Assessment should include the following:

- Determine the relevant Building Emission Benchmarks (BEBs) for NO2 and PM10 for the development, based on its land use-class and location (see Appendices 5 and 6 in the Sustainable Design and Construction SPG 2014 Mayor of London and the GLA's Air Quality Neutral Planning Support Update);
- Calculate the site's NOx and PM10 emissions from buildings and compare then with the BEB(s);
- Determine the relevant transport emission benchmarks (TEBs) for NOx and PM10 for the site;
- Calculate the sites NOx and PM10 emissions from transport and compare them with the TEBs;
- The BEBs and the TEBs should both be met, for both NOx and PM10, to achieve the air quality neutral requirement. In-line with the policy context in London, the development shall

be at least 'air quality neutral'. Developers shall mitigate the residual impacts and provide local mitigations to deal with any adverse air quality impacts associated with development proposals, including if the development fails to meet one or more of the AQN (Air Quality Neutral) benchmarks.

4.1.3 Demolition and Construction

Given the 120-month construction programme and phased occupation of the Proposed Development, the demolition and construction assessment should include a worst-case assessment in which the effects of construction on new on-site receptors (e.g. residents) are considered.

The ES should clearly set out the definition of 'temporary' effects as, whilst the Scoping Report refers to 'temporary generation of dust from construction works' and 'temporary changes in traffic related emissions during the construction works', the demolition and construction programme is anticipated to be ten years in duration; therefore, it is likely that that demolition and construction related effects are long term.

It is likely that air quality monitoring will be required during the demolition and construction works should the Proposed Development be granted planning permission.

The ES should also consider the potential effects arising from any required remediation of the Application Site, which can result in emissions to air and as a result, risk to human health and nuisance.

The Air Quality (Dust) Risk-Assessment (AQDRA) is to provide a detailed risk-assessment for each construction sub-phase as outlined in the Control of Dust and Emissions During Construction SPG 2014, Mayor of London. The ES should identify adherence to the GLA Control of Dust and Emissions SPG as a mitigation measure to be secured within any given planning permission.

The potential for cumulative construction traffic effects is to be sufficiently considered and assessed as required. The approach to determining cumulative construction effects should be based on the anticipated number of demolition and construction trips of each cumulative scheme considered. The projected traffic flows from cumulative schemes should be gathered based on information available in the public domain.

4.1.4 Operation

LBTH expects that should the air quality assessment identify levels of air pollution above the National Air Quality Objective levels, mitigation is to be provided, noting that the use of filtered inlet air is not normally considered to be acceptable. Occupants of the proposed residential units are not to be exposed to air in excess of the UK air quality objectives, the effect on future on-site receptors is to be assessed as confirmed in Paragraph 134 of the Scoping Report. Mitigation measures such as greenery (landscape, living green walls, trees, etc.), and winter gardens instead of balconies/terraces on certain floors should be considered. Given LBTH's understanding of Air Quality in the area of the Application Site, there may need a need to limit residential uses and balconies on the lower floors. It is recommended that modelling is undertaken early in the design process to ensure the Air Quality within the Application Site is taken into account within the design of the Proposed Development.

It is noted that Paragraph 133 of the Scoping Report refers to *"an energy centre / CHP (where one is proposed)"*. LBTH expects the ES to confirm the on-site (or any off-site) energy sources to be utilised, the location/s and emissions arising from these. LBTH considers that the use of any boilers or CHP units should be assessed if back-up or temporary generators/boilers are to be assessed.

The Scoping Report confirms that open space is proposed as part of the Proposed Development. The position of such space, including any play space, should be considered in the ES in relation to air quality, to avoid adverse effects.

The ES is to provide a transparent account of the modelling undertaken, all assumptions made and all input data used, including datasets used, methodologies (monitoring, modelling, and scenarios), meteorological data, background concentrations, traffic data (flow, speeds, etc.), dispersion model type.

Given the height of the Proposed Development, the Air Quality aspect chapter will need to assess the effects at various heights and identify at which levels mitigation is required. If mechanical ventilation is required, the ES should specify at what level/location air of a suitable quality can be utilised and ensure the ventilation strategy is consistent between the overheating strategy and noise assessments i.e. whether other assessments are relying on open or closed windows.

LBTH considers that a commitment to using electric (or other technology) vehicles for servicing and delivery associated with the Sainsbury's and retail elements of the Proposed Development should be made within the planning application which can be secured within any given consent.

4.2 Climate Change

4.2.1 Proposed Approach

Paragraph 145 of the Scoping Report states that a climate change resilience assessment and greenhouse gas (GHG) assessment will be undertaken. The associated aspect chapter will consider the climate change resilience of the Proposed Development; any in-combination climate impacts associated with the Proposed Development (whereby climate change events alter the significance of environmental effects identified in other aspect assessments); and the impact of the Proposed Development on climate change.

4.2.2 General Comments

Paragraph 165 of the Scoping Report states that no detailed assessment is proposed to be provided for inter-project cumulative effects. LBTH agrees that a detailed assessment accounting for all proposed developments in the area that may have a cumulative effect with the Proposed Development is not required. Given that the level of significance of effect should be determined against local emissions targets and compared against UK wide budgets, LBTH expects cumulative schemes to be assessed qualitatively, based on a broad assumption that by their nature, the cumulative schemes are expected to be major developments of a similar scale to the Proposed Development. This will enable a cumulative effects assessment based on a worst-case scenario.

The Applicant presents the UK Climate Change Projections 2018 (UKCP18) future climate change projections relative to the 1981-2000 baseline period under RCP8.5 within Table 4 of the Scoping Report. LBTH expects that the RCP8.5 emissions scenario of UKCP18 will be used in the assessment. In accordance with guidance, the consideration of climate change should use RCP8.5 emissions scenario, at a 50% certainty level.

All climate change resilience and adaption measures should be included within the 'Mitigation and Monitoring Schedule' chapter of the ES, and consideration should be given to producing a Climate Change Resilience and Adaptation Plan in accordance with IEMA EIA Guide to Climate Change Resilience and Adaptation (2020).

The Applicant should assess GHG emissions quantitatively; any use of professional judgement to assess significance should be fully justified. All references to carbon emissions should refer to carbon dioxide, CO_2, carbon dioxide equivalent, or CO_2e and not carbon alone.

In accordance with IEMA Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating Their Significance (2017), all GHG emissions are to be considered as significant. The level of significance of effect should be determined against local emissions targets and compared against UK wide budgets, based upon professional judgement. The Applicant is reminded that all likely significant effects must be stated in the Non-Technical Summary.

The GHG assessment is to cover all phases of the project lifespan, from demolition and enabling works through to end of life (including decommissioning as the end-of-life stage). Where professional judgement has been used, this should be made clear with any assumptions and reasoning explicitly stated.

Any further guidance published before submission of planning application, in addition to the guidance referenced within the Scoping Report, should be considered within the assessment.

Mitigation measures to meet adopted and any emerging policy and will need to be secured within any given planning consent. Particular attention should be made to ensuring emission reduction measures are integrated and delivered through the construction and operation phases (e.g. selection of construction methodologies, selection and use of construction equipment and vehicles, and selection and transport of materials that have low embodied GHG emissions). As a Greater London Authority (GLA) referable scheme subject to London Plan Policy SI 2 and Policy SI 7, the findings of the Proposed Development's Whole Life Cycle Carbon Assessment and Circular Economy Statement should be referred to in the assessment.

For the GHG emission assessment of the Proposed Development's operational phase, the EIA should set out how the Proposed Development will be net zero carbon on-site in 2050, as required by the Climate Change Act 2008 (as amended) and London Plan Policy SI 2. It should be noted that Policy D.ES7 within Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020) requires residential development to achieve zero carbon. Reference in the ES should be made to whether the national, regional and local policy requirements in relation to energy and GHG are satisfied by the Proposed Development.

It is noted that since January 2019 the GLA has encouraged the use of Standard Assessment Procedure (SAP) 10 carbon emission factors to estimate the carbon produced by new buildings in addition to Part L of the Building Regulations 2013.

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

4.3.1 Proposed Approach

Paragraph 166 of the Scoping Report states that a Daylight, Sunlight, Overshadowing and Solar Glare Assessment will be undertaken, and Paragraph 168 of the Scoping Reports states that the aspect chapter will consider the potential for likely significant effects as a result of the Proposed Development on daylight, sunlight and overshadowing to existing, neighbouring residential properties, as well as existing open space and public amenity areas. Paragraph 168 of the Scoping Report further states that given the proximity of sensitive viewpoints to the Application Site, a Solar Glare Assessment will be undertaken.

It is noted that Paragraph 412 of the Scoping Report proposes to scope out assessment of Daylight, Sunlight, and Overshadowing within the Proposed Development from the ES and this aspect is dealt with in Section 5.2 of this Scoping Opinion.

4.3.2 General Comments

It is noted that light pollution is included in the aspect chapter title in the Scoping Report; however, this matter is dealt with in Paragraph 169 of the Scoping Report which provides a discussion

proposing to scope out an assessment of light pollution due to the residential nature of the Proposed Development. LBTH agrees that this is acceptable for the residential element of the Proposed Development; however, LBTH notes that approximately 7,500 sqm GIA of non-residential uses (including restaurant, retail and office (Use Class E(a), E(b) and E(g))) will be provided. Therefore, LBTH expects that a light pollution assessment should be undertaken for the non-residential uses of the Proposed Development or justification should be provided in the ES, if it is considered that such an assessment is not required.

LBTH notes that Paragraph 178 of the Scoping Report states that *"At distances greater than 500m from the Proposed Development, instances of solar glare would be unlikely to occur. Given the close proximity of the railway line from Kentish Town in relation to the Proposed Development, viewpoints along this railway line may need to be assessed"*. LBTH considers this to be an error, given that Kentish Town Station is located approximately 10 km to the north-west of the Application Site and would, therefore, unlikely be affected by any potential instances of solar glare from the Proposed Development.

The study area and individual properties assessed should be clearly stated and justified within the ES and shown on a figure for ease of understanding. It is noted that a list of receptors to be considered has been provided in Paragraph 175 of the Scoping Report, however no figure is provided so the exact receptors to be assessed is not known. Reference is made to Aberfeldy Road, which is understood to refer to Aberfeldy Street, and Carndale House, which is understood to refer to Carradale House. Bromley Hall School, Poplar Baptist Church, River Thames and Tidal Tributaries SINC, and receptors on Brion Place should be identified as receptors.

The effects on and from cumulative schemes must be assessed such as Leven Road Gas Works (PA/18/02803), Leven Road Bus Depot (PA/19/02148), Islay Wharf (PA/19/01760) and Ailsa Wharf (PA/18/03461 and PA/21/01739), in addition to Phase 1-3 of Aberfeldy Masterplan.

4.3.3 Demolition and Construction

The approach set out in Paragraph 180 of the Scoping Report regarding assessment during demolition and construction is agreed, which confirms a qualitative assessment of the demolition and construction stage will be undertaken. This assessment should consider, at least qualitatively, likely effects from construction equipment, such as with cranes in situ.

4.3.4 Operation

The overall effect at each receptor (i.e. each residential dwelling) must be based on an overall view of the impacts to individual windows and rooms as set out in the significance of assessments with guidance from "*Appendix I: Environmental Impact Assessment of the BRE guidelines*". LBTH will not accept mitigation factors such as "external balconies" or "single aspect rooms deeper than 5M" being used as reasons to downgrade significance of effects from say "Moderate" to "Minor". These can be stated as possible reasons for light loss but not as mechanisms to change the banding of effect.

For neighbouring properties, the tests carried out should be Vertical Sky Component (VSC) and No Sky Line (NSL). This should include NSL contour plans which clearly show which rooms have been modelled from plans and which rooms are assumed, this can simply be done using a colour coded key. The numerical classifications that should be used for categorisation of VSC and NSL impacts are:

- Reduction of under 20% or in the case of VSC retained VSC at 27% or more - Negligible significance;
- Reduction of 20% or more but under 30% – Minor significance;
- Reduction of 30% or more but under 40% – Moderate significance; and

- Reduction of 40% or more – Major significance.

For sunlight, the Annual Probability of Sunlight Hours (APSH) in summer and winter should be assessed for windows that face within 90 degrees of due south. The numerical classifications that should be used for categorisation of APSH are:

- Achieves at least 25% APSH for annual sunlight hours with 5% APSH in the winter months or reduction in light is no greater than 20% of the existing condition (meets the BRE Guidelines) - Negligible;
- Reduction of 20% or more but under 30% - Minor Adverse;
- Reduction of 30% or more but under 40% - Moderate Adverse; and
- Reduction of 40% or more - Major Adverse.

The two-hour sun contour test (overshadowing) test is to be undertaken. The numerical classifications that should be used for the overshadowing tests are:

- Achieves at least two hours of sun two 50% of its area on 21st March or reduction of under 20% of the existing condition (meets the BRE Guidelines) - Negligible;
- Reduction of 20% or more but under 30% - Minor Adverse;
- Reduction of 30% or more but under 40% - Moderate Adverse; and
- Reduction of 40% or more - Major Adverse.

Two-hour sun contour drawings on the 21st March and transient overshadowing diagrams should be provided for open space provided as part of the Proposed Development and surrounding the Application Site. The position of amenity space should be carefully considered in relation to daylight and sunlight and assessed accordingly.

The assessment should assess the change in daylight/sunlight provision, but also whether the conditions that remain are suitable.

Depending on the proximity of final cumulative schemes identified, it is requested that an additional scenario is tested, which shows the existing scenario with cumulative schemes but without the Proposed Development. This will help the Council understand more clearly what the effects of the Proposed Development itself are, and effects of cumulative schemes.

The effects on cumulative developments, including those not yet constructed, as a result of the Proposed Development must be assessed.

Layouts for rooms in neighbouring properties are to be researched on the statutory planning register, estate agents' websites or land registry. The use of properties i.e. residential needs to be cross referenced with the council tax band government website: http://cti.voa.gov.uk/cti/inits.asp, this will show accurately which properties are residential and therefore need to be tested for the EIA.

The Applicant is also required to provide a summary table for daylight, which includes the following:

- The receptor (i.e. each building);
- The number of windows / rooms in the receptor tested;
- The number of windows / rooms which meet the BRE criteria;
- The number of windows / rooms which do not meet the BRE criteria, split by minor, moderate and major significance, as per the criteria outlined above;

- The number of dwellings affected; and
- Commentary on minor, moderate and major sunlight and daylight losses.

LBTH can provide an example summary table on request.

4.4 Noise and Vibration

4.4.1 Proposed Approach

The Scoping Report states that the noise and vibration aspect chapter of the ES will consider:

- Changes in noise levels at existing sensitive receptors as a result of traffic and plant noise generated by the Proposed Development during demolition and construction;
- Changes in noise levels at existing sensitive receptors as a result of traffic and plant noise generated by the Proposed Development during operation; and
- Suitability of the proposed Application Site uses in relation to the noise environment.

4.4.2 General Comments

In addition to the proposed effects proposed to be assessed as outlined above, the assessment is to consider potential vibration effects.

Given that the application site is adjacent to the Blackwall Tunnel Northern Approach and East India Dock Road, LBTH expects the Applicant to consider the layout of the Proposed Development to limit the potential exposure to unacceptable noise levels. This accords with the requirement to consider alternatives within EIA Regulations.

The Applicant should note that LBTH is particularly concerned with the potential cumulative effects during demolition, construction and operation of the Proposed Development. The ES must ensure the cumulative effects are sufficiently established, specifically in relation to simultaneous cumulative effects but also the accumulated effect over time.

Noise monitoring and sensitive receptors should be agreed with LBTH's Environmental Health Officer. LBTH's minimum requirement is for noise monitoring to be undertaken continuously for 7 days and nights.

Sufficient details of the noise and vibration monitoring and surveys should be provided within the ES to enable the reader to understand the conditions during the monitoring / surveys and whether this may have affected the results. In addition, the ES should identify the specific locations where monitoring has been undertaken, explain how these locations were selected, confirm when this monitoring was undertaken and the time period covered.

The ES should clearly identify the receptors and study area in relation to noise and vibration surrounding and the Application Site, and their sensitivity to potential construction and operation of the Proposed Development. A map should be provided to support this and appropriate descriptors. The ES should ensure all receptors likely to be significantly affected are identified and assessed, and to ensure the planning requirements are met in addition to the EIA requirements, LBTH will need to understand the extent of adverse effects from the Proposed Development.

No reference is made to the Significant Observed Adverse Effect Level (SOAEL) and Lowest Observed Adverse Effect Level (LOAEL). The LOAEL and SOAEL should be defined for all of the construction and operational noise and vibration matters assessed (e.g. airborne noise, groundborne vibration etc.) and these thresholds should be used to determine the significance of absolute noise levels. The determination of these thresholds should be clearly explained in

relation to the Local Plan, standards, guidelines or other reliable point of reference.

LBTH expects the Applicant to ensure the assessment is undertaken with reference to NPPF (2019) the Noise Policy Statement for England (NPSE) (2010), relevant British Standards, and LBTH policy and guidance, in addition to the guidance referenced in Paragraph 207 of the Scoping Report. The ES should ensure all guidance used to inform the assessment is relevant and extant, and ensure that all references are provided in full, are correct and included in reference list.

4.4.3 Demolition and Construction

Given the 120-month construction programme and phased occupation of the Proposed Development, the demolition and construction assessment should include a worst-case interim assessment in which the effects of construction on new on-site receptors (e.g. residents) are considered.

Reference must be made in the ES to LBTH's Code of Construction Practice (CoCP), which includes information on hours of working etc. and consideration should be given to the Considerate Contractors scheme.

For reference LBTH requires that noise levels measured 1 metre from the façade of any occupied building neighbouring the site shall not exceed 75dB(A) at residential and commercial properties, and 65dB(A) at schools and hospitals (LAeq,T where T = 10 hours Monday to Friday and 5 hours for Saturday) during demolition and construction of the Proposed Development.

The assessment of demolition and construction is to be undertaken in accordance with the ABC methodology as set out in BS 5228-2:2009+A1:2014.

The guidance in DMRB should be considered in the assessment of demolition and construction traffic noise.

LBTH also expects the Applicant to commit to a thorough ongoing monitoring program throughout the construction period, with sufficient controls in place should noise levels, and as appropriate vibration levels, exceed agreed standards.

4.4.4 Operation

The Application Site suitability assessment must include, but not be limited to, the effects of noise and vibration arising from road traffic and air traffic. For reference LBTH requires that internal ambient noise levels in habitable rooms except bedrooms do not exceed 35dB LAeq,16 hour, between the hours 07:00 - 23:00 and within bedrooms do not exceed both 30 dB LAeq, 8 hour and LAmax 45 dB more than 10 times between the hours 23:00 - 07:00.

The positioning of any proposed noise sensitive uses e.g. amenity space associated with the Proposed Development should be carefully considered in relation to noise and assessed accordingly. The ES should demonstrate suitable target levels for internal noise levels are met in properties during operation of the Proposed Development.

Assessment is required with regards to the effect from operational noise associated with the Proposed Development, including noise from mechanical plant as proposed in Paragraph 201 of the Scoping Report. In the control of noise from fixed building services plant, that plant that may be introduced as part of the Development should be designed to a level 10 dB below the lowest existing background noise level at a position 1 m from the façade of the nearest sensitive receptors (i.e. Plant LAeq,T = -10 dB LA90,T), in accordance with LBTH policy D.ES9.

The Acoustics Ventilation and Overheating (AVO) Guide should be referenced with the assessment so that the approach to the acoustic assessment takes due regard of the interdependence of provisions for acoustics, ventilation, and overheating. Application of the AVO Guide is intended to demonstrate good acoustic design as described in the ProPG: Planning &

Noise, May 2017 when considering internal noise level guidelines. The Applicant must ensure that any mitigation of adverse effects related to noise and vibration and air quality is compatible with any overheating strategy proposed in the application.

It should be noted that the Proposed Development will be subject to the agent of change principle, in accordance with London Plan Policy D13. This places the responsibility for mitigating the impact of noise and vibration firmly on the Proposed Development. This means that where new developments are proposed close to existing noise-generating uses, Applicants will need to design them in a way to avoid significant adverse noise and vibration impacts on the new occupiers, including residents. Whilst this may be achieved through the provision of improved noise insulation measures within the Proposed Development, there may be parts of it where residential use would be considered inappropriate because significant effects would still be likely to occur despite them.

The agent of change principle works both ways. If a new noise-generating use is proposed close to existing noise-sensitive uses, such as residential development or businesses; the onus is on the new user to ensure its building or activity is designed to protect existing users or residents from noise impacts.

4.5 Health

4.5.1 Proposed Approach

The Scoping Report states that human health will be assessed within the relevant aspect chapters as set out in Paragraph 216 and within a Health Impact Assessment will be submitted with the planning application, and that no standalone health aspect chapter will be provided within the ES.

4.5.2 General Comments

The Applicant is advised to consider integrating the HIA into the EIA to minimise duplication and facilitate enhanced consideration of health within the EIA as well as meeting the requirements of both the HIA policy and the EIA Regulations.

For clarity, the introductory section of the ES should contain a table which provides a clear cross-reference to where the relevant information on human health is located in the ES, such as within the HIA, wind microclimate (including strong wind occurrences), daylight, sunlight and overshadowing, socio-economics, air quality, noise and vibration, transport aspect, ground conditions, water environment chapters of the ES.

In accordance with LBTH policy D.SG3, and policy within the NPPF and London Plan, a **detailed** HIA is to be submitted in support of the planning application. Any likely significant effects identified within the HIA should be further assessed as part of the EIA. It should be noted that the emerging policy requires *'Developments of a scale referable to the Greater London Authority (as set out in legislation) are required to complete and submit a **detailed** health impact assessment as part of the planning application'*. Detailed HIAs **must be informed by sufficient consultation**, in order to identify the relevant health determinants for the Proposed Development and assess their impact. It is noted from Paragraph 221 of the Scoping Report that the scope of the detailed HIA has been discussed with the LBTH's HIA Officer (in May 2021). The required consultation is to also be agreed with LBTH's HIA Officer.

The HIA is to be structure around the following key themes, as identified within LBTH's HIA Guidance (2021):

- Delivering healthy layouts;
- Promoting neighbourhood cohesion;

- Enabling active living; and
- Creating the healthiest of environments.

A key aspect of the HIAs will be identifying whether any vulnerable groups could be disproportionally affected as a result of the Proposed Development, and how the development might actively address and reach out to benefit population groups who are identified as suffering from inequality of health outcomes.

The Applicant is reminded that all likely significant effects must be identified and assessed within the ES. The ES is to clearly state whether the HIA identified likely significant effects, and where such effects are assessed within the ES.

Community engagement will offer a qualitative impact analysis of those who will experience living on or near the Application Site and who might suffer or benefit from its many features and their combined health impact. While it might be difficult to quantify the impact of any single risk factor/determinant of health (as per HUDU checklist), it is therefore important for the Applicant to take into account the experience of the local population. The criteria questions in the Tower Hamlets HIA guidance can help inform consultation on health.

Please see Ben Cave's A Review Package for Health Impact Assessment reports of development projects(https://www.researchgate.net/publication/237489850_A_Review_Package_for_Health_Impact_Assessment_Reports_of_Development_Projects) for guidance on how to develop and present the detailed HIA.

HIA has a broad remit to assess a number of determinants of health at building or site level including housing quality and design, access to healthcare and other social infrastructure, access to open space and nature, air quality, noise and neighbourhood amenity, active travel, community safety, access to healthy food, access to work and training, climate change. The HIA is to assess their impact on a range of health outcomes including physical, mental, environmental health as well as health equity and safety.

With regards to the HIA, evidence shows that design and layout have an impact on behaviour pattern. While the Applicant cannot anticipate the ways buildings and spaces are used or other lifestyle factors of future residents, the Applicant must ensure that the proposed site layout maximises the health benefits, promotes communal/open space promoting cohesion, enables active living and contributes to environmental sustainability, all key factors for health. The Applicant is reminded that the way buildings and spaces are used is also determined by their availability, accessibility, design and maintenance, all of which can be considered at planning stage. The analysis of health risk factors at various relevant spatial scales (room, building, street, site and neighbourhood levels) is required as a range of smaller and consistent negative design issues can potentially affect human health.

LBTH recommend the Applicant refers to Sports England's Active Design for instance to ensure that active design principles are embedded into the design and layout of their development to meet planning and transport objectives (see p. 56 Sports England's Active Design). Furthermore, the HIA will need to consider the impact not just on the Application Site but on the wider population. The Applicant must identify an impact area in view of the size of the development, the local demographics and existence of local infrastructure around the Application Site.

4.6 Socio-economics

4.6.1 Proposed Approach

The Scoping Report states that the socio-economics aspect chapter of the ES will assess employment opportunities and loss of existing employment and residential accommodation during

construction and operation, operational employment and spending, provision of commercial floorspace, housing and affordable housing provision, effects on social infrastructure (specifically primary healthcare, early years, primary and secondary education, open space provision and child play space provision), and effects on crime, deprivation and social cohesion.

4.6.2 General Comments

The Scoping Report does not identify whether the effects on dentists, nurseries, leisure and other community facilities will be considered within the ES. The ES should consider the potential effects on these or provide justification as to why not assessed. The Applicant is reminded it is not acceptable to scope out aspect or matters on the basis of difficulty undertaking the assessments.

Table 3 of the Scoping Report provides the matrix to determine effects for the socio-economic assessment. The matrix includes the classification that impacts of medium magnitude on assets of medium sensitivity, will result in a moderate effect. LBTH considers that this classification is proportionate. However, given this is in line with the overall methodology for the ES as set out in Table 2 (page 21) of the Scoping Report, the Applicant should consider the need for repeating matrix in the ES.

This assessment will need to include consideration of LBTH's affordable housing target i.e. a minimum of 35% (noting that sites on public land require a minimum of 50% to benefit from the fast track route, in accordance with the London Plan), and required housing mix i.e. 70% rented and 30% intermediate tenure split. Should the Proposed Development not meet LBTH's affordable housing target, this should be assessed as being an adverse effect as the Proposed Development has failed to meet the communities' minimum need. If the affordable housing provision changes after the planning application has been submitted, reassessment may be required as part of the ES. The assessment should ensure that the new site users have access to sufficient levels of social infrastructure, such as health, and recreation etc.

The ES should clearly identify the receptors and study area in relation to socio-economics, surrounding and within the Application Site, and their sensitivity to potential construction and operation works. This should include a map and appropriate descriptors.

The ES should clearly set out how all figures have been calculated (e.g. employment generation) and justified as appropriate, with reference to other relevant documents/aspect chapters where appropriate and ensure this represents the worst-case scenario. This is particularly relevant for the assessment of the non-residential uses proposed, and it must be ensured the worst case has been assessed.

The data sources are to be fully referenced with relevant comments regarding the reliability of such data and any other limitations. Given the proximity of London Borough of Newham to the Application it is considered that local effects will affect areas within London Borough of Newham, and therefore the baseline and subsequent assessments are to consider London Borough of Newham in addition to LBTH.

LBTH consider that consultation should be undertaken to ensure data utilised in the assessment is up to date, for example patient data for doctor's surgeries, and school place data. The socio-economic assessment should ensure the most up to date data informs the assessment and clearly state any assumptions and limitations. The ES should summarise any consultation activity that has been undertaken with appropriate organisations.

4.6.3 Demolition and Construction

LBTH has an above average unemployment level within Greater London. LBTH will seek to ensure that jobs are provided for local people, both in the construction phase of the Proposed Development and by the end-users, where appropriate.

When calculating employment figures the Homes and Community Agency's (HCA) Employment Densities Guide should be used. Where there are a range of 'area per Full Time Equivalents (FTE)', information should be provided on why a specific figure has been used. It should be noted that the HCA guide references both GIA and NIA, and therefore the EIA should ensure that the correct figures are used for the correct land uses. Specific consideration should be given to the loss of current employment within the Application Site and the potential disruption of businesses adjacent to and in proximity of the Application Site during demolition and construction.

4.6.4 Operation

Refer to the text above on employment calculations.

It is noted that Paragraph 240 of the Scoping Report states that the child yield anticipated to arise from the Proposed Development will be calculated based on the GLA Population Yield Calculator. LBTH requires that LBTH's Child Yield Calculator is used inform the socio-economic assessments.

The future baseline and cumulative effects will be an important assessment in relation to the socio-economic aspect chapter, and the assessment should ensure that the new site users have access to sufficient levels of social infrastructure, such as health, education, open space and play space on a phase-by-phase basis. Assessments of demand for community facilities should be supported quantitative information including likely population increase from cumulative schemes where possible.

Where adverse effects are identified the Applicant is to identify mitigation as confirmed in Paragraph 240 of the Scoping Report. This should include consideration of providing facilities that are over capacity and adversely affected by the Proposed Development.

4.7 Townscape and Visual Impact Assessment

4.7.1 Proposed Approach

Paragraph 241 of the Scoping Report states that the Townscape and Visual Impact Assessment (TVIA) will consider effects on townscape and visual amenity, as a result of the Proposed Development during demolition and construction, and operation.

4.7.2 General Comments

The Scoping Report states that the general approach and methodology of the TVIA will be based on Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA 3) and the London View Management Framework (LVMF).

The ES should clearly identify the receptors considered within the TVIA and their sensitivity to the demolition and construction, and operation of the Proposed Development. This should be supported by a clear map outlining the receptors and study area, such as the figure provided in Appendix G of the Scoping Report.

All judgements on the significance and direction of effects on views and townscape need to be fully explained and justified.

The assessment of townscape character should have regard to the location and sensitivity of affected townscape character areas (with reference to the Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020), Urban Structure and Characterisation Study and other relevant guidance, such as Conservation Area appraisals, design guides, supplementary planning documents and the Tower Hamlets Conservation Strategy), in addition to such documents adopted by the London Borough of Newham.

A list and map of proposed views has been provided within the Scoping Report in Appendix G. This will need to be discussed and agreed with LBTH's Urban Designer through a site visit, a VU City Model and / or an initial assessment. It is helpful if photos with wirelines of the Proposed Development are provided in the first instance to inform the identification of rendered views.

From an initial consideration LBTH consider the following viewpoints should also be assessed in the townscape and visual aspect chapter:

- Viewpoints to demonstrate how the setting of Grade II* listed Balfron Tower and associated Conservation Area is affected by the Proposed Development, to include a view from Brownfield Street;
- Viewpoint from Royal Oak Public House (Grade II) on Barking Road;
- Viewpoint from Memorial Recreation Ground.
- Locally (Royal Borough of Greenwich) designated views (as identified in policy DH(g) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies):
  - View 7: Thames side panorama from the Thames Barrier open space.
  - View 9: Docklands Panorama from the Wolfe Monument; and
  - View 11: 02 from Central Park.

The Applicant is advised to consult with the Twentieth Century Society and Historic England regarding the viewpoints proposed to ensure the effects on Balfron Tower and Carradale House listed buildings can be sufficiently understood, The Applicant is advised to refer to the Twentieth Century Society's and Historic England's consultation response in this regard.

The Applicant should consider whether the Proposed Development would be visible in LVMF views and Borough designated views (as identified in Figure 6 of policy D.DH4 of the Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020).

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.

The TVIA methodology should accord with the GLVIA3 methodology as described within the Scoping Report. It is therefore understood that the TVIA will highlight the 'residual' likely significant effects for townscape and views (those effects which remain following the implementation of suitable mitigation/iterative design measures). The TVIA should clearly establish which levels of effect are deemed significant, with clear justification as to the nature (adverse, beneficial or neutral) of effect.

As a part of the hybrid planning application, LBTH understands that accurate visual representations (AVRs) will be included within the ES. The Scoping Report states that this will include for fully rendered (photorealistic) (AVR3) and wireline images (AVR1) to show the outline of the development, as set out in Paragraph 263 of the Scoping Report, produced at a level of detail appropriate to the particular view in question.

Images should be prepared in accordance with the Landscape Institute's Technical Advice Note 06/19 'Visual Representation of Development Proposal'. Visualisations are required to be undertaken in accordance with Type 4, as described on Page 11, and Pages 21-24. The presentation of AVRs should reference the latest Landscape Institute Guidance on visualisations (TGN 06/19) and should include a detailed description of the AVR production methodology.

The ES should contain a detailed methodology, which demonstrates that the views can be relied on as a fair representation of the impacts of the Proposed Development. The assessment should not focus on only any beneficial effects of the Proposed Development.

It should be noted that whilst townscape, views and built heritage are interrelated, each matter should be clearly defined and dealt with appropriately in order to comply with the current guidelines e.g. its own methodology, and effects identified. Some guidance on links to cultural heritage assessments is provided at paragraphs 5.7-5.11 of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA 3). The townscape and visual assessments in the TVIHA should be informed by the built heritage assessment, especially in relation to sensitivity and value of heritage assets and provide clear cross-reference as appropriate.

All cumulative schemes identified for assessment should be clearly identified on a plan showing their location relative to the Proposed Development and for each viewpoint by an AVR illustration where they would be in view, to show how the cumulative effects assessment has been determined.

4.7.3 Demolition and Construction

The ES should confirm details of any construction compounds and Application Site hoarding and provide assessment within the TVIA as required. The TVIA should also consider the programme of work, including any phasing of construction.

4.7.4 Operation

The ES should assess winter views so that vegetation is not screening the Proposed Development. In views where there is no vegetation, summer visualisations may be used.

4.8 Traffic and Transport

4.8.1 Proposed Approach

The Scoping Report states that the traffic and transport aspect chapter of the ES will consider the potential effects of the Proposed Development during demolition, construction on severance, and amenity, fear and intimidation, and during operation on severance, pedestrian and cyclist delay, vehicle and bus delay, amenity, fear and intimidation, and accidents and safety during operation.

4.7.2 General Comments

With regards to Paragraph 284 of the Scoping Report, the scope of the assessment should be agreed with LBTH Highways in addition to Transport for London (TfL). The scope of trip generation and traffic modelling is to be agreed with LBTH and TfL prior to submission.

Cyclists must be assessed appropriately and separately from pedestrians, recognising that cycling amenity and infrastructure and effects on cyclists are not always the same as pedestrians. Areas where cyclists must dismount must not be included as cyclist amenity spaces. If people cannot cycle, then the facility is not a cyclist amenity. The ES must clearly identify how cyclists may use the repurposed Abbott Road vehicular underpass, and any other proposed embedded or enhanced mitigation measures for cyclists. In addition, consideration should be given to how cyclists will connect with Cycle Superhighways 2 and 3.

Mitigation measures for buses, especially route 309 and any potential rerouting, should clearly identify how the measures will be secured and acknowledge where mitigation is within the Applicant's control and when it is not. Table 5 of the Scoping Report notes that during demolition and construction, severance and amenity, fear and intimidation will be assessed for local roads only. It also notes that severance, pedestrian and cyclist delay, vehicle and bus delay, amenity, fear and intimidation and accidents and safety will be assessed during operation. LBTH consider that pedestrian and cyclist delay, vehicle and bus delay, accidents and safety are to be scoped into the assessment during demolition, and construction. It is agreed that the assessment of hazardous loads can be scoped out of the ES on the basis on hazardous loads would be

generated as a result of the Proposed Development.

LBTH considers that rail delay and the effects on public transport should be assessed for operation and, therefore, must be scoped in. As part of the assessment of public transport, station capacity assessments for London Underground and DLR stations, and line loading assessments are to be undertaken and agreed with LBTH and TfL.

No consideration has been given to junction capacity within the Scoping Report. This matter is considered to be scoped in unless it can be sufficiently justified that significant effects are not likely. The Applicant is advised to consult with LBTH and TfL in this regard.

LBTH considers that diverting traffic from the existing Abbott Road vehicular underpass has the potential to result in likely significant adverse effects on existing users of adjacent roads (including non-drivers through fear and intimidation, and severance in other areas). The implementation of pedestrian and cyclist connectivity through the Abbot Road underpass may reduce severance in this area but may also introduce adverse impacts in other areas. It will be important for the ES to present the changes to other areas in a balanced way.

In addition to the above, appropriate consideration must be given to the timeframe of when Abbott Road diversions will be delivered. For example, if Abbott Road will be closed to vehicular traffic early during the construction phase, then this must also be assessed during construction.

Appropriate consideration must also be given to the timeframe for delivery of any other mitigation measures which may be proposed to address the significant adverse effects on adjacent roads from diversion of traffic. For example, there may be a time where the underpass is closed to vehicles (with adverse effects on the road network) and not yet open to pedestrians and cyclists (no beneficial effect).

LBTH consider that changes to access and servicing to the Proposed Development and effects on nearby properties should also be considered and assessed.

No scenarios for assessment are set out in the Scoping Report. These should include:

- Existing baseline year;
- Assessment baseline (opening year) without the Proposed Development i.e. Do Nothing;
- Assessment (opening year) with the Proposed Development i.e. Do Something;
- Existing baseline year plus peak hour construction vehicle movements associated with the Proposed Development; and
- A key relevant interim scenario with partial occupation and partial construction of the Proposed Development.

It must be ensured that the traffic scenarios to be assessed are appropriate to support the consideration of all environmental aspects, particularly given the hybrid nature of the planning application.

Where the future baseline incorporates transport capacity improvements and environmental gains, from which the Proposed Development potentially benefits, these must be clearly identified and where there is uncertainty about their future realisation, sensitivity testing should be undertaken to show the likely effect in their absence. This applies equally to the noise and vibration and air quality assessments where they rely on the transport modelling. It must be ensured that cumulative developments are factored into the transport modelling.

Where there are shortfalls in the IEMA guidance, the TfL Healthy Streets Approach should be used.

The TA should be produced in line with TfL's Transport Assessment Best Practice Guidance. The

Applicant should be aware that as part of TfL's ongoing work embedding Healthy Streets in London's planning system, TfL are providing new guidance and resources for planning Applicants at the TfL website, including Vision Zero and Road Safety Audit recommendations, a new Healthy Streets TA template and advice on when and how Healthy Street tools and guidance documents apply to planning applications and policy.

The Applicant is encouraged to use TfL's Transport Classification of Londoners to help inform expected transport mode shares.

It is not clear from the Scoping Report whether there may be temporary or permanent road or path closures during construction and operation. Any temporary or permanent closures are to be assessed in the ES as part of the severance assessment. If any roads or paths are to be closed, a figure should be provided which clearly shows any road or path closures proposed as part of the Proposed Development.

The Applicant should confirm that long and short stay cycle parking provision will be provided in line with the minimum standards set out in the London Plan and designed in accordance with the London Cycle Design Standards. The Applicant should demonstrate as part of the TA how the Proposed Development will link to the strategic cycle network.

The ES should clearly identify the study area and receptors in relation to highways and transport surrounding and within the Application Site, and their sensitivity to demolition and construction, and operation works. The study area should be detailed on a map. It should be clear how any professional judgement has been applied in the ES.

The detailed assessment methodology for this aspect chapter and the TA should be agreed in consultation with transportation officers at LBTH and TfL. Details of the consultation undertaken should be set out in the ES. The Applicant is advised to agree the trip generation and any modelling scope with LBTH and TfL, prior to submitting the application.

All modelling assumptions and limitations should be clearly stated and justified; similarly, where professional judgement has been employed, this should be justified, and assumptions explained.

LBTH expects that all mitigation measures relied upon in the ES are clearly stated, it is not sufficient for mitigation measures to be only detailed within the TA; it is noted that the relevant documents which secure such mitigation measures e.g. a DSP and Travel Plan are to be submitted as part of the planning application.

4.8.3 Demolition and Construction

The ES must include construction vehicle numbers, Heavy Goods Vehicles (HGVs) numbers and likely traffic routing. Assessment of demolition and construction must compare HGVs from the demolition and construction phase to HGVs in the baseline. It is not acceptable to compare only total vehicles, as the effects on, for example, fear and intimidation are greater from HGVs.

Cumulative impacts will be an important consideration given the location of the Proposed Development in an area of significant growth, particularly considering the cumulative schemes will introduce HGVs and construction traffic onto local streets at the same time as the Proposed Development.

All vehicle parking associated with the construction will be expected to be accommodated within the Application Site, minimising the impact on the local area.

An outline Construction Logistics Plan (CLP) is to be submitted as part of the planning application and should be prepared in accordance with TfL guidance, which is available at: http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf. The CLP should assess the impact of the Proposed Development traffic in relation to other developments and infrastructure projects that are within close proximity of the Application Site.

a CLP/CEMP can act as mitigation, it does not eliminate adverse effects, and the effects must be appropriately assessed within the ES. The CLP/CEMP should not be over-relied upon as mitigation.

4.8.4 Operation

The ES and TA must contain a multi-modal impact assessment including baseline and future vehicle (car, vans, Light Good Vehicles (LGVs) and Heavy Good Vehicles (HGVs)), public transport (bus, Crossrail, DLR, London Underground and Overground) and pedestrian and cycle trips and the overall mode share. Demand for individual mode of public transport should be assessed, and provide an estimate based on directions; this would enable determination of the need and size of mitigation required. A full multi-modal trip generation should be prepared using relevant data from TRICS and deriving mode share from recent proposals in similar locations.

Peak hour demand split out by mode and direction of travel will be required to make a full assessment of the scheme impacts and determine any necessary mitigation.

Given the Mayoral focus on Healthy Streets, it would be useful to clearly integrate the Healthy Streets principles within the EIA and TA. Improvement measures where identified should be fully funded. Healthy Streets principles should be integrated into the ES. All streets in and around the Application Site should prioritise walking and cycling and, where vehicle access is necessary, streets should be designed for very low speeds where cars are guests. Active freight should be prioritised, and deliveries and servicing consolidated where possible. Bus priority should be improved to help maintain bus reliability and as an intrinsic element in the Healthy Streets Approach.

In accordance with Policy T4 of the London Plan, a Residential Travel Plan is proposed to support sustainable and active travel. This should be prepared in accordance with TfL guidance. A draft Delivery Service Plan (DSP) is also to be submitted as part of the planning application, and the DSP should reflect the need for robust safety standards from freight operators and encourage the consolidation of deliveries to minimise impact on the highway network. Measures to reduce peak-time freight trips would be most welcome.

All servicing will be expected to take place within the boundaries of the Application Site, minimising the effect on the public highway. The way in which the Proposed Development is to be serviced should be clearly diagrammatised. The ES should also include specific details regarding the proposed delivery to and servicing of the Proposed Development (e.g. the location and capacity of loading facilities for deliveries, and the anticipated increases in Light Goods Vehicles (LGVs)) so that the relevant assessment can be provided and effects identified, where necessary.

LBTH considers that a commitment to using electric (or other technology) vehicles for servicing and delivery associated with the Proposed Development should be made within the planning application which can be secured within any given consent.

An Active Travel Zone (ATZ) assessment should be provided in line with TfL guidelines, and the scope of these agreed with both LBTH and TfL. In line with TfL's recently published guidance, the ATZ methodology should be followed to assess key walking and cycling routes in the vicinity of the Application Site. In line with London Plan policy T2, proposals to enhance local walking and cycling routes should come forward through this ATZ assessment process. The ATZ map should include an overlay of KSIs (Killed or seriously injured) and any TfL Safer Junctions schemes. For any clusters (one or more killed, two or more seriously injured) along key routes in the ATZ assessment, changes must be suggested that would make these routes safer using the Healthy Streets approach. The ATZ assessment should take account of people from all walks of life and identify opportunities for increasing inclusive travel.

Any Application Site-specific measures related to borough and TfL infrastructure and services must be secured with the s106 agreement.

4.9 Wind Microclimate

4.9.1 Proposed Approach

The Scoping Report states that the Wind Microclimate aspect chapter of the ES will qualitatively consider effects of wind speeds during construction and will quantitatively assess effects of wind speeds (comfort and safety) as a result of the Proposed Development during operation.

4.9.2 General Comments

Given the height of the Proposed Development, the assessment should consider wind speeds at elevated levels of the Proposed Development, as stated in Paragraph 332 of the Scoping Report. For the avoidance of doubt the assessment is to assess the wind microclimate to be experienced on any balconies, open space and roof terraces as appropriate, including those provided within the Proposed Development, as well as within surrounding buildings as required. The Applicant should review whether any such spaces are within the study area for assessment, and this should be confirmed in the ES.

4.9.3 Demolition and Construction

As stated in Paragraph 335 of the Scoping Report, effects during demolition and construction are to be assessed using professional judgement (qualitatively) within the ES, which is considered acceptable. For the avoidance of doubt, the ES should provide assessment of wind effects during construction utilising the worst-case scenario, such as with cranes in situ. It should be clear where professional judgement has been applied.

4.9.4 Operation

LBTH consider that City of London (CoL) Microclimate Guidelines (August 2019), should inform the assessment methodology given the location of the Application Site is adjacent to in a significant growth area (as per the site allocation in Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020)). However, it is not considered that Annex A of the CoL Microclimate Guidelines can be applied to LBTH as the guidelines confirm these parameters have been scaled specifically for CoL. LBTH consider that any dining areas should meet the City Lawson Criteria for frequent sitting i.e. 2.5m/s.

LBTH expects an initial assessment of the Proposed Development should be undertaken using Computational Fluid Dynamics (CFD), and that the results of the CDF analysis contribute to the design of the Proposed Development and/or the mitigation measures which may be required to achieve suitable conditions for the proposed uses on-site. LBTH expects wind tunnel testing will then be undertaken on the final scheme to inform the wind microclimate aspect chapter.

Wind tunnel testing will be undertaken to assess wind conditions at various receptors' location and the suitability of the intended uses. Scenarios to be tested are:

- Baseline (Existing Application Site + Existing Surrounding Context);
- Proposed Development (detailed element only) + Existing Surrounding Context;
- Proposed Development (detailed and outline elements) + Existing Surrounding Context;
- Proposed Development (detailed and outline elements + Future Surrounding Context (cumulative schemes); and
- Future Baseline (Existing Application Site + Future Surrounding Context).

Given the proximity of cumulative schemes located to the north, east and south (presented within Appendix C of the Scoping Report) of the Application Site, LBTH considers that the existing baseline scenario with future surrounds (i.e. cumulative schemes) but without the Proposed Development will help to differentiate the effects from the Proposed Development and those from nearby cumulative schemes, which is understood to be proposed as the future baseline scenario.

If mitigation measures are required to ensure wind conditions are suitable for their intended use, wind tunnel testing of these measures is to be undertaken and any results provided in the ES.

The ES should set out exactly what measures are required for mitigation and how these will be secured. It must be ensured that all mitigation measures and landscaping proposed and tested in the wind microclimate aspect chapter are proposed within the landscaping strategy, as there are often discrepancies where required mitigation measures are not brought forward in other planning application documents.

The ES should consider whether future monitoring is required to test actual conditions of the Proposed Development.

A study area covering a 450 m radius from the centre of the Application Site will be used, which LBTH considers to be acceptable.

The following plans should be included in the ES:

- The intended uses of the Application Site (e.g. the open spaces, thoroughfares, entrances);
- What conditions are being targeted (e.g. open space should be suitable for sitting); and
- The mitigation measures relied upon.

This allows the reader to understand the basis of the assessment and provides the opportunity to contest the uses and anticipated wind categories. For the avoidance of doubt, results are to be presented for both the windiest season, and summer season.

Any spaces that are proposed as part of the Proposed Development, and that are relied upon by the Applicant to provide amenity, should have wind conditions suitable for this use.

The location of any strong winds should be clearly annotated on a plan, noting that all strong winds are to be mitigated to safe levels. LBTH considers that all instances of strong wind are to be identified as a significant effect and are to be reported in the ES and Non-Technical Summary accordingly.

Whilst the Applicant is reminded that any significant beneficial effects are to be assessed within the ES, it should be noted that a failure to achieve wind conditions suitable for their intended use is more significant and cannot be offset by locations where wind conditions are better than required for their intended use. It is considered that beneficial effects should not be considered significant, unless they lead to acceptable conditions off-site where conditions were previously not acceptable.

The assessment should demonstrate how climate change has been considered within the Wind Microclimate aspect chapter of the ES, noting that the UK Climate Projections 2018 (UKCP18) states "*an increase in near surface wind speeds over the UK for the second half of the 21st century for the winter season [is predicted] when more significant impacts of wind are experienced. This is accompanied by an increase in frequency of winter storms over the UK"* Whilst it is acknowledged that *"the increase in wind speeds is modest compared to interannual variability for the PPE-15"*, more extreme wind conditions are predicted overall.

4.10 Archaeology (Buried Heritage)

4.10.1 Proposed Approach

The Scoping Report states that an Archaeology Desk-Based assessment will be undertaken, and an Archaeology aspect chapter will be prepared, which will consider the following of the Proposed Development on archaeology assets:

- Site set-up works, including contractors compound set-up and associated temporary services levelling work and other preparatory ground works including remediation for unexploded ordnance (UXO) and chemical contaminants;
- Construction, including foundation excavation or pile installation, service installation, road construction;
- Landscaping, including ground reduction or levelling and creation of attenuation tanks and ponds;
- Compression of buried remains from vehicle movement, construction of spoil tips, bunds or raised landscape areas; and
- De-watering of waterlogged or organic archaeological remains through alterations to the level of groundwater across the Application Site.

4.10.2 General Comments

Paragraphs 354 to 355 of the Scoping Report proposes to scope out the assessment of operation effects from the Archaeology aspect chapter. The assessment should consider, where appropriate, the likelihood of alterations to existing drainage and groundwater patterns that might lead to *in situ* change, decomposition and/or destruction of below ground archaeological remains and deposits, which can also lead to subsidence of buildings.

The Application Site is within Lea Valley Tier 3 Archaeological Priority Area (APA) which has potential to contain both palaeoenvironmental evidence and evidence of prehistoric human activity such as that identified at earlier stages of the Aberfeldy redevelopment where a picture of prehistoric human land management along the Lea has emerged in the limited trenching so far undertaken.

The Applicant is reminded that The Greater London Archaeology Advisory Service (GLAAS) provide LBTH's archaeology advice. The Applicant is advised to refer to Policy S.DH3 of Tower Hamlets Local Plan 2031 (2020).

It is noted that Paragraph 360 of the Scoping Report refers to 'basements', though it is unclear as to the depth or extent of these. The effect of any basement levels as part of the Proposed Development are to be assessed with regards to archaeology, based on a clear identification of the depth and extent of the basement works including construction methodology and any associated dewatering required.

The ES should clearly identify the receptors and study area in relation to archaeological resources, and their sensitivity. The ES should be supported by an up-to-date archaeological desk-based assessment, a geoarchaeological model of the Application Site and its surroundings, created from available geotechnical and geoarchaeological data, by a recognised geoarchaeological specialist. The model should then be used to assess the impact of the Proposed Development in terms of depth and extent of impact on potentially sensitive deposits. The impact assessment should include application of the 2019 Historic England piling impact guidance.

The ES must also be informed by the results of any further pre-submission work, as agreed with GLAAS following the completion of the model and impact assessment. The Applicant should refer

to GLAAS's consultation response in this regard.

The Applicant is remined that conclusions must be informed by, and compliant with, up to date planning policy and Historic England technical guidance on archaeology and development. The Applicant is to take account of the following guidance within the Archaeology aspect chapter and Archaeological Desk Based Assessment:

- English Heritage (2008), Conservation principles, policies and guidance.
- Chartered Institute for Archaeologists (2014), Standard and guidance for commissioning work or providing consultancy advice on archaeology and historic environment.
- Historic England (2017), Land Contamination and Archaeology. To ensure buried remains are considered when creating and managing the conceptual site model and remediation programme.
- Historic England's Piling and Archaeology Guidelines and Good Practice document (2019).
- Historic England (2020), Deposit Modelling and Archaeology: Guidance for Mapping Buried Deposits.

The Archaeology aspect chapter of the ES should be informed by the below listed elements. The Applicant's attention is drawn to the consultation response from Historic England in this regard.

- An up-to-date Archaeological Desk Based Assessment;
- A geoarchaeological model of the Application Site and surroundings, using existing data and prepared by a recognised geoarchaeological specialist;
- An assessment of the Proposed Development's impact using the Desk Based Assessment and the geoarchaeological model;
- Results of any further pre-submission fieldwork, as agreed with GLAAS following the completion of the geoarchaeological model and impact assessment and
- A mitigation programme that includes appropriate public benefits.

The ES should outline the measures required to preserve and present the Application Site's archaeology heritage as part of the Proposed Development.

The Applicant is advised to carefully consider the residual effects of the Proposed Development. Often residual effects are referred to a negligible, when archaeology assets are permanently harmed and / or destroyed which underplays the likely effects of the Proposed Development.

4.10.3 Demolition and Construction

The ES should confirm the piling methodology proposed to facilitate the Proposed Development e.g. depth of piles, type of piling and area of piling. Potential effects on archaeology as a result of piling should be clearly presented within the ES, as well as any assumptions made when assessing effects as a result of piling.

4.10.4 Operation

As raised above, the assessment is to consider, where appropriate, the likelihood of alterations to existing drainage and groundwater patterns that might lead to *in situ* change, decomposition and/or destruction of below ground archaeological remains and deposits, which can also lead to subsidence of buildings and monuments.

4.11 Built Heritage

4.11.1 Proposed Approach

The Scoping Report states that the Built Heritage aspect chapter will consider effects of the Proposed Development on built heritage receptors (designated and non-designated assets), including their heritage significance and the contribution made to that significance by their setting during demolition and construction, and operation of the Proposed Development.

4.11.2 General Comments

The built heritage assessment must provide assessment of all built heritage assets likely to be significantly affected; in addition, it may be necessary to assess effects not likely to be significant to ensure the planning requirements are fulfilled, in addition to the ES requirements. It must be ensured, that the study area is based on the zone of visual influence of the Proposed Development, noting the anticipated maximum height of the Proposed Development at 96 m.

The Scoping Report includes a list of the heritage assets most directly affected by the Proposed Development within Paragraph 371 and 372 of the Scoping Report and shown within Figure 10, noting that all heritage assets to be assessed are yet be agreed with LBTH. LBTH consider that a zone of visual influence is provided to inform the heritage assets to be scoped into the assessment. However, from an initial consideration it is considered that the following should also be assessed:

- Maritime Greenwich World Heritage Site and Scheduled Monument;
- Three Mills Conservation Area;
- Limehouse Cut Conservation Area;
- Lansbury Conservation Area;
- Naval Row Conservation Area;
- All Saints Church Conservation Area;
- Northern portal and parapet to the Blackwall Tunnel (Grade II);
- East India Dock Wall and Gateway (Grade II);
- Poplar Baths (Grade II);
- Statue of Richard Green (Grade II);
- Church of St Saviours (Grade II);
- Twelvetrees Crescent Bridge (Grade II);
- Group of Gasholders former Bromley-by-Bow gasworks (Grade II);
- Northern Ventilation Shaft to the Blackwall Tunnel (Grade II);
- Dry Dock at Blackwall Engineering (Grade II);
- Blackwall Pier (Grade II);
- Trinity House (Grade II);
- Royal Oak Public House (Grade II);
- 162 St Leonards Road Locally listed building;
- 159-167 St Leonards Road locally listed buildings;
- Dowgate Wharf, 22 Gillender Street (Grade II) and 21-22 Gillender Street locally listed buildings;

- 18 Follet Street locally listed building;
- Mission House locally listed building;
- St Freideswide Halls locally listed building; and
- Heritage assets within the identified Conservation Areas

The Application Site itself contains a portion of the Grade II listed Bromley Hall School site, any direct effects on Bromley Hall school should be fully considered assessed in addition to the effects on the setting.

The Applicant is advised to consult with the Twentieth Century Society, with particular regard to the effects of the Proposed Development on Balfron Tower and Carradale House listed buildings. The Applicant is advised to refer to the Twentieth Century Society's consultation response in this regard. Given the height of the Proposed Development and the surrounding landscape character, the Proposed Development is likely to be visible across a very large area and could, as a result, affect the significance of heritage assets at some distance from the Application Site itself. The ES must demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by the Proposed Development have been included and can be properly assessed. The ES must be supported by a figure which clearly identifies all built heritage receptors that have been assessed, similar to that provided to Figure 10 of the Scoping Report.

It is considered that non-designated features of historic, architectural, archaeological or artistic interest should also be identified as receptors for, in addition to designated heritage assets and locally listed structures. Since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. It is noted that non-designated heritage assets should not just be limited to locally listed buildings.

The assessment should be undertaken with reference to various Historic England guidance such as *The Setting of Heritage Assets*, GPA 3 (December 2017) and *Tall Buildings*, Advice Note 4 (December 2015), which is due to be updated in the near future.

A clear analysis of the heritage significance of each affected heritage asset, including the contribution of its setting to heritage significance, should be provided. All judgements on the significance and direction of effects on heritage assets need to be fully explained and justified.

The ES assessment should provide consideration of Section 184 to 202 of the NPPF regarding the levels of harm the Proposed Development is likely to result in.

The ES is to provide reference to all guidance that has informed the assessment. Reference should be made to LBTH Character Appraisals and Management Guidelines for relevant Conservation Areas, in addition to such document adopted by the London Borough of Newham.

It should be noted that whilst townscape, built heritage and views are interrelated, each matter should be clearly defined and dealt with appropriately in order to comply with the current guidelines e.g. its own methodology, and effects identified. Some guidance on links to cultural heritage assessments is provided at paragraphs 5.7-5.11 of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA 3).

4.11.3 Demolition and Construction

The ES should confirm details of any construction compounds and provide assessment as required.

The Applicant is reminded that demolition and construction effects, although temporary, can still be significant in terms of EIA and the relevant residual effects must be reported as such.

4.11.4 Operation

LBTH has no specific comments to make on this element of the assessment at this time.

4.12 Cumulative Effects

4.12.1 Proposed Approach

The Scoping Report states that the ES will assess potential cumulative effects as a result of the interaction of individual effects resultant from the Proposed Development on a receptor ('intra-project cumulative effects') and from the Proposed Development interacting with other developments ("inter-project cumulative effects"). A provisional list of cumulative developments is provided in Appendix C of the Scoping Report.

It is understood from Paragraph 102 of the Scoping Report that the assessment of inter-project cumulative effects will be assessed in each aspect chapter, and from Paragraph 107 of the Scoping Report that intra-project effect interactions will be provided as a separate ES chapter.

4.12.2 General Comments

The intra-project cumulative effects assessment should conclude whether effects on receptors are considered to be significant and this should be clearly stated within the ES and NTS. The assessment should not be limited to stating the range of effects on each receptor as reported within each aspect chapter as, for example, several minor effects on a receptor may result in a moderate i.e. significant effect which would not be identified if only a range of effects is presented. In addition, the intra-project cumulative effect assessment should not only consider individually significant effects from the aspect chapters as a number of insignificant effects on the same receptor, can cumulatively result in a significant effect. The ES should clearly state the methodology for assessment of intra-project effects. The ES should clearly state the methodology for assessment of effect interactions and must clearly state whether interactions are significant or insignificant.

It should also be noted that effects can accumulate over-time to result in a cumulatively significant effect and this aspect should be considered in addition to effects that occur simultaneously. This should be taken into account within both the inter and intra cumulative effects assessments.

The cumulative effects assessments (both inter and intra-project assessment) should consider likely effects on specific receptors and or groups of receptors, in addition to general aspects of the environment. Cumulative effects assessments should not just consider whether the magnitude of effects is greater, but also other aspects such as whether the duration of effects on a receptor are increased.

The inter-project assessment should be quantitative, where possible, utilising the relevant data from the corresponding planning applications. It is not appropriate to undertake a qualitative assessment where data is publicly available. LBTH expects that the cumulative schemes are reviewed throughout the EIA process to ensure the cumulative effects assessment, includes submitted, approved, and existing developments that may give rise to significant cumulative effects. Through the Scoping Report, the Applicant seeks to agree the cumulative schemes to be assessed; whilst this is welcomed, cumulative schemes for assessment must still be reviewed throughout the EIA process.

Cumulative effects will be an important consideration when determining the planning application. The EIA will need to carefully assess the effect that the Proposed Development has both on, from and with, cumulative schemes.

The Scoping Report states that cumulative schemes over 10,000 sqm (GEA) and over 150

residential units have been considered. Whilst LBTH agrees that schemes of this scale are more likely to give rise to cumulative effects, cumulative effects can arise from smaller scale developments e.g. several smaller scale developments within the vicinity of the Proposed Development may, in cumulation with the Proposed Development, result in significant effects, as well as larger developments which are further than 1 km from the Application Site.

It should be noted that approved projects at the time of determination are to be assessed; therefore, it may be appropriate to include projects which are likely to be approved prior to the determination of the Proposed Development to avoid delays determining the planning application for the Proposed Development. This is particularly relevant in light of the Pearce v Secretary of State for Business Energy and Industrial Strategy (BEIS) (2021) case law, and therefore LBTH would expect schemes to be considered whether granted or not. LBTH encourages the Applicant to contact relevant developers of cumulative schemes to obtain required information if such information is not yet publicly available. This is particularly relevant for the Proposed Development, given the number of cumulative schemes proposed on sites adjacent and surrounding the Application Site.

The Applicant should provide a clear figure within the ES of cumulative schemes scoped in or out of the assessment and the study area/s, as provided in Figure C1 of Appendix C of the Scoping Report.

LBTH requires the current status of all cumulative schemes to be provided in the ES, as is provided in Table C1 of Appendix C of the Scoping Report.

LBTH have reviewed the list of cumulative schemes provided in Appendix C of the Scoping Report and has identified the following schemes for inclusion / consideration in the cumulative effects assessment:

- Areas 7 and IC Barking Road, Canning Town - 11/00662/LTGDC (within the London Borough of Newham Planning permission granted)
- Blackwall Reach - PA/12/02752, PA/14/02480, PA/16/01958/P3 (planning permission granted) and PA/20/02371 (likely to be determined before the Proposed Development);
- Aberfeldy Estate – PA/11/02716, PA/11/03548, PA/13/01844, PA/15/00002, and PA/15/01826 (planning permission granted);
- 116-118 Chrisp Street - PA/14/02928 (planning permission granted);
- Bromley by Bow North - PA/11/02423 (planning permission granted);
- 43-45 Gillender Street - PA/19/01628 (planning permission granted);
- Goodluck Hope - PA/19/02773 (likely to be determined before the Proposed Development);
- 160 Chrisp Street - PA/15/00039 (Planning permission granted);
- Bow Common – PA/19/02379 (Resolution to grant planning permission);
- Stroudley Walk - PA/19/02292 (planning permission granted);
- Blackwall Jetty - PA/21/00288 (likely to be determined before the Proposed Development);
- Mulberry Place - PA/21/01304 (Scoping Opinion requested);
- Land under the DLR bounded by Scouler Street, Aspen Way and Prestage Way - PA/19/02292 (planning permission granted);
- Global Switch - PA/21/00986 (Could be determined before the Proposed Development);

- 1 Paul Julius Close (Reuters) - PA/13/01861/A1 (planning permission granted);
- North Quay - PA/20/01421/A1 (likely to be determined before the Proposed Development);
- Tower Hamlets College, 112 Poplar High Street - PA/19/02067/NC (scoping opinion issued);
- Chrisp Street Market – PA/21/01975 (scoping opinion requested);
- Trinity Buoy Wharf - PA/17/00729 and PA/19/00957 (planning permission granted); and
- The Silvertown Tunnel Order (2018).

The Crossrail Act (2008). The Crossrail Hybrid Bill was enacted on 22nd July 2008 when it completed all the Parliamentary stages and received Royal Assent to become The Crossrail Act (2008).

For the avoidance of doubt, developments which are essentially completed should be assessed as part of the baseline where relevant, as confirmed in Paragraph 103 of the Scoping Report. However, it must be ensured that the effects of cumulative schemes which are 'essentially complete' but not yet operational are taken into account, as for example if not yet fully operational, the transport movements will not be included at the time of baseline surveys, and therefore trip generation data from the essentially complete cumulative schemes will still need to be added in the future baseline scenario.

Reserved Matter applications and Minor Material Amendment applications are to be considered and reviewed in relation to the schemes identified for inclusion in the inter-project cumulative effects assessment. This is particularly relevant for EIA developments as these applications can give rise to additional significant effects. It is noted that all references to Reserved Matter applications and Minor Material Amendment applications relevant to the cumulative schemes as proposed in Appendix A have not been identified.

The Applicant must provide sufficient justification, to scope out any of the schemes identified above, in relation to likely significant effects.

The Applicant should consider the Planning Inspectorate's Advice Note 17 which provides a best practice approach to Cumulative Effect Assessment.

For the avoidance of doubt LBTH considers that the cumulative construction and operational effects can result in significant effects and are to be assessed within the ES.

4.12.3 Demolition and Construction

LBTH will require the overlapping construction periods of nearby committed developments and resulting consequential effects to be assessed.

Standard, generic mitigation measures (normally included within a Construction Environmental Management Plan (CEMP)) do not always provide adequate and sufficient mitigation. The ES will therefore need to identify site-specific but achievable measures with reference to how these can be secured and implemented. The construction timelines and routes of such cumulative schemes are to be assessed in the ES in the relevant aspect chapters, and it should not be assumed that all cumulative developments adopting best practice measures would avoid construction effects occurring.

It is requested that an outline CLP is submitted as part of the ES, which should make reference from TfL's CLP Guidance (2017). Importantly, Page 31 of Tfl's CLP Guidance states that that, *"Where there is a concentration of construction activity, it is good practice to set up a construction working group, with representatives from all interested parties, including TfL and the Local Planning Authority. The working group should share the results of the CLPs, broken down so that*

people can see the impact for each individual development phase and the numbers and types of vehicles in use. There is an expectation that the contractor will participate and work together with others in the area to minimise impacts".

4.12.4 Operation

LBTH considers that operational effects should be considered and assessed within both the intra-project cumulative assessment and inter-project cumulative assessment, as noted above.

5. REVIEW OF ASPECT CHAPTERS PROPOSED BY THE APPLICANT TO BE SCOPED OUT OF THE ES

It is noted that the Applicant is seeking to scope the following aspect chapters out of the EIA because they consider they are unlikely to generate any significant environmental effects:

- Ecology and Biodiversity;
- Daylight, Sunlight and Overshadowing – Internal;
- Geoenvironmental (Ground Conditions, Groundwater and Land Take and Soils;
- Water Resources, Drainage and Flood Risk;
- Project Vulnerability;
- Electronic Interference; and
- Waste; and

LBTH's position on each of the aspect chapters proposed to be scoped out of the ES is provided below.

It is noted that aviation has not been considered within the Scoping Report, LBTH has therefore provided consideration of these aspects within Section 5.8 Scoping Opinion.

5.1 Ecology and Biodiversity

The Scoping Report proposes to scope out an assessment of Ecology from the ES, on the basis that the Preliminary Ecological Appraisal (PEA) (Appendix E of the Scoping Report) which details the results of an ecological data search and an Extended Phase 1 Habitat Survey, found the Application Site has limited ecological value. The Scoping Report also states there is low potential on the Application Site to support foraging, commuting and roosting bats, moderate potential to support nesting birds and no potential to support black redstart. Presence of invasive/non-native species (INNS), including Virginia creeper and Buddleia has been confirmed.

No statutory or non-statutory designated sites were recorded within the Application Site boundary and the Proposed Development is not expected to have an impact on statutory and non-statutory designated sites within 2 km of the Application Site with the adoption of a CEMP and noting the limited public access to such sites.

In addition to the above, it was identified that whilst the Epping Forest Special Area of Conservation (EFSAC) lies approximately 6.4 km to the north of the Application Site, based on the information currently available, it is anticipated that the Proposed Development will have no likely significant effects on the SAC. This is due to the Proposed Development sitting outside of the *"6.2km Zone of Influence buffer detailed within the EFSAC Interim Mitigation Strategy and the net increase in vehicle trips as a result of the Proposed Development are considered to be negligible beyond the local road network (see Transport Scoping Report for the proposed development)"*.

LBTH notes that the PEA (presented in Appendix E of the Scoping Report and upon which the above justification is based) was undertaken for a site area of 7.35 ha, rather than the 9.69 ha area of the Application Site, with the main section of the Application Site not having been included within the PEA being Jolly's Green. LBTH considers that whilst the wildlife habitat of Jolly's Green is unknown, it is by far the most biodiverse area within the Application Site boundary and the Applicant should note that there have been several recent biodiversity enhancement projects at Jolly's Green, led by Trees for Cities, working with the local community. LBTH considers that the Applicant should update the PEA with the correct Application Site boundary, to enable LBTH to successfully consider whether an Ecology and Biodiversity aspect chapter can be scoped out of the ES. Noting that the Scoping Report does not confirm whether the areas of open space within the Application Site are to be retained as part of the Proposed Development. LBTH therefore, requires an **Ecology and Biodiversity aspect chapter to be scoped into the ES**, unless the Applicant can provide the updated PEA including Jolly's green and further details regarding the proposals for the areas of open spaces to demonstrate likely significant effects are not likely to occur.

It should be noted that all ecology surveys should be valid at the time of determination, and all required further must be undertaken and submitted to support the planning application. The Applicant is advised to refer to CIEEM's Advice Note on the lifespan of ecological reports and surveys (2019).

The Proposed Development has the potential to enhance biodiversity and achieve biodiversity net gain through biodiverse roofs and other biodiversity enhancements, which will be required in accordance with the relevant planning policy. A Biodiversity Net Gain assessment is to be undertaken. Ecological enhancements should contribute to the local biodiversity action plan (LBAP).

5.2 Daylight, Sunlight and Overshadowing – Internal

Paragraph 412 Scoping Report proposes to scope out an aspect chapter on daylight, sunlight and overshadowing within the proposed residential units and within the new public realm on the basis that is considered a design consideration rather than an environmental consideration.

It is noted in Paragraph 412 of the Scoping Report states that daylight, sunlight and overshadowing within the proposed residential units will be assessed and presented as separate standalone report submitted in support of the planning application.

LBTH agrees **Daylight, Sunlight and Overshadowing – Internal, new receptors within the Proposed Development can be scoped out of the ES** as an aspect chapter on the basis that a standalone report is submitted in support of the planning application and the results of this report are summarised in the Daylight, Sunlight, Overshadowing and Solar Glare aspect chapter, supported by a summary/conclusion paragraph of the daylight and sunlight levels.

The overshadowing of public amenity spaces to be provided within the Proposed Development is to be assessed in the ES to ensure such spaces are suitable for the intended use. Two-hour sun contour drawings on the 21st March and transient overshadowing diagrams should be provided for all open space provided as part of the Proposed Development.

5.3 Geoenvironmental (Ground Condition, Groundwater and Land Take and Soils)

Paragraphs 413 to 437 of the Scoping Report propose to scope out a Geoenvironmental assessment on the basis that the Proposed Development is unlikely to give rise to significant residual adverse effects in respect of land contamination, ground conditions, groundwater and

land take. This is supported by a Phase 1 Report which is presented in Appendix F of the Scoping Report.

The Phase 1 Report has identified the likely source-pathway-receptor pollutant linkages and provides a qualitative indication of the level of risk posed by potential ground contamination at the site. Specifically, Paragraph 428 of the Scoping Report states that *"the Phase 1 concludes that the general risk of contamination of receptors (i.e. construction works, future on-site users, neighbours) and resources (i.e. groundwater) is considered to be mostly low to moderate, with a moderate risk identified for volatile inhalation from groundwater"*. From this preliminary assessment, the Applicant has identified recommendations for further surveys and reporting. These include, but are not limited to, the following:

- Undertaking an intrusive Site Investigation (involving laboratory testing) subsequent to planning determination, followed by further stages of investigation and site remediation agreed through planning conditions.
- The Intrusive Investigation will include a risk assessment of the contamination at the Application Site, which would be undertaken by comparing measured levels of soil contamination with generic assessment criteria established through industry guidance and best practice.
- Should significant areas of contamination be identified during the further site survey/investigation work, a Remedial Strategy (including options appraisal) will be undertaken. Remediation strategies for soil include:
    - The remediation of soils on-site;
    - A strategy for ensuring separation between source and receptors via structural slabs, membranes and soil capping layers (as appropriate);
    - Off-site treatments (where practicable); and/or
    - The disposal of soil off-site.
- The appropriate Remedial Strategy will be agreed as appropriate in advance of any remediation work. The remediation framework will identify remediation requirements for the protection of human health and controlled waters, as well as identifying any areas that require remediation to be undertaken.
- Should a Remedial Strategy by implemented, a verification process will be undertaken to confirm that the strategy has remediated the soils to a level acceptable for the intended end use of the site (based on site specific criteria).
- An assessment for the potential for ground gas will be completed during further intrusive site investigation work.

Paragraph 431 of the Scoping Report concludes that, overall*, "the proposed ground works across the site, associated with the preparatory ground works and foundation excavations during the construction of the Proposed Development, will result in the appropriate treatment of the identified areas of contamination (i.e. soils and materials). This will result in residual beneficial effects to the local environment, through reducing the net contaminant loading at the site and surrounding area"*.

Whilst the Scoping Report has not considered the implications of the proximity of the Application Site to the former Leven Road Gas Works, though it is noted the gas works is considered within Appendix F of the Scoping Report, and the potential contamination associated with the gas works in detail, it is noted (in Appendix C – Cumulative Schemes – of the Scoping Report) that a hybrid planning application was submitted to the LBTH in 2018 for a residential-led mixed-use

development on the former gas works site. The project was subsequently granted planning permission in October 2019 and it is understood that regeneration works have since commenced. LBTH considers, therefore, that the requisite demolition and construction related environmental management/mitigation and monitoring measures for the former gas works development have been secured and controlled through an appropriate CEMP (or equivalent) and that this has been secured via planning condition(s). Consequently, the former gas works site, as a potential source of contamination, is less of a risk now and in future.

For the Proposed Development, key mitigation and management controls should form part of a CEMP for the demolition and construction works and it is noted that the Applicant states in Paragraph 217 of the Scoping Report that this would be prepared in advance of any works commencing on-site. This should be presented in the ES to help define the policies, procedures, and management framework for the implementation of any identified specific geoenvironmental management and mitigation controls and monitoring.

In view of the above, LBTH considers that a **Geoenvironmental assessment and aspect chapter can be scoped out of the ES**. The Applicant is reminded that all mitigation measures relied upon for scoping Geoenvironmental (Ground Conditions, Groundwater and Land Take and Soils) out of the ES must be referenced within the Mitigation and Monitoring Schedule chapter of the ES, which must include all measures stated in the Scoping Report.

It should be noted that within Policy D.DH8 of Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020), Paragraph 8.89 requires daylight assessments to follow the methodology set out in the most recent British Standard for daylighting.

5.4 Water Resources, Drainage and Flood Risk

The Scoping Report proposes to scope out an assessment of Water Resources, Drainage and Flood Risk from the ES. This is on the basis of the basis that a Flood Risk Assessment and Drainage Strategy will be submitted as part of the application, which will meet planning policy requirements, in addition it is stated that wastewater capacity will be confirmed with Thames Water should planning permission be granted, and water demand is considered to be taken into account with Thames Waters Water Resource Management Plans. Unspecified water efficiency measures are proposed.

The Application Site is in Flood Zone 3, but benefits from flood defences. The Application Site is primarily located within an area with very low and low risk of surface water flooding, with areas of medium and high flood risk along the existing roads within the Application Site. The Application is also at risk of reservoir flooding.

The Application Site lies within a Critical Drainage Area (as illustrated in Figure 15 of the Tower Hamlets Local Plan 2031), with the potential for hydraulic connectivity between the Application Site and the former gas works site. Given the nature, scale and context of the Proposed Development LBTH considers that **Water Resources, Drainage and Flood Risk aspect chapter is to be scoped into the ES** as it is considered the Proposed Development is likely to result in significant effects on water resources, drainage and flood risk, and an aspect chapter is to be provided within the ES.

The Flood Risk Assessment (FRA) and Surface Water Drainage Strategy are to form the basis for this assessment and will need to be submitted with the application; the mitigation measures secured as part of these documents should be clearly stated in the ES.

LBTH expect the Water Resources, Drainage and Flood Risk aspect chapter to be informed by contaminated land assessments.

If the Proposed Development requires dewatering as a result of the construction of any basements or groundworks, the ES should consider and assessment the potential for this activity to effect on water quality and / or groundwater flows occur.

The ES should assess whether the demand for water supply and sewage treatment of the Proposed Development can be met and that there is sufficient capacity in the utility networks to meet the predicted demand both on and offsite before occupation of the Proposed Development. A cumulative assessment is required in this regard. Consultation with Thames Water on clean and wastewater capacity should be undertaken prior to the submission of the application, to determine what measures are required to mitigate a development of this scale (including cumulatively). Details of the water consumption rate and sewerage discharge rate should be provided within the ES.

The Integrated Water Management Plan (IWMP) for the Isle of Dogs and South Poplar (October 2020) (Available here: https://data.london.gov.uk/dataset/isle-of-dogs-and-south-poplar-integrated-water-management-plan), sets out a hierarchy of requirements that the Proposed Development should adhere to. The Applicant must refer to the IWMP and incorporate IWMP requirements to avoid likely significant cumulative effects, which should be clearly set out in the ES. It should be noted that measures set out in the IWMP may have consequential effects on other sensitive receptors, and if these are proposed, consequential effects may need to be assessed in the ES.

LBTH's Sustainable Drainage Proforma must be submitted as part of the planning application. LBTH considers that habitat creation incorporating Sustainable Drainage Systems (SuDS) within the Proposed Development to be a mandatory requirement.

The Applicant is advised that the Application Site is within a LBTH Critical Drainage Area (CDA), as per Figure 15 of the LBTH's Local Plan. Therefore, the Proposed Development must achieve greenfield runoff rates as per the Local Plan policy as this is a mandatory requirement within a CDA.

The updated Environment Agency climate change allowances (2020) should be considered as part of the assessment and modelling undertaken. The FRA must include an assessment of the latest River Thames Tidal Upriver flood modelling (2017) to inform the sequential and exception tests, set finished floor levels, and access and egress routes. The latest River Thames Tidal Upriver flood modelling (2017) can be obtained by contacting HNLenquiries@environment-agency.gov.uk. It should be demonstrated that the Application Site passes the Flood Risk Sequential Test, and it is advised that consultation is undertaken with the Environment Agency regarding the FRA requirements and the need to ensure the Proposed Development provides safe access in the event of a flood. LBTH considers that the drainage strategy should be designed to accommodate the 1 in 100-year event + 40% climate change.

Finished floor levels are required to be above the TE2100 breach event, and provide safe access and egress in such events and the Proposed Development should contribute to the delivery of the vision of the Thames Estuary 2100 Plan (TE2100), and follow the specific recommendations on how to manage tidal flood risk. This should be considered and assessed in the ES.

5.5 Project Vulnerability

Paragraphs 466 to 474 of the Scoping Report propose to scope out an assessment of risk of major accidents and/or disasters (i.e. project vulnerability) from the ES, on the basis that there are no relevant risks, that aren't otherwise managed and assessed, which may give rise to major accidents and disasters. It is noted that vulnerability of the Proposed Development will be

assessed with regards to food risk and wind microclimate.

It is considered that the ES should include a description and assessment of the potential vulnerability of the Proposed Development to risks of major accidents and disasters, which are relevant to the Proposed Development, including vulnerability to climate change and flood risk. Measures to prevent or mitigate significant adverse effects of such events should be provided in the ES where relevant.

It is important that the introductory section(s) of the ES sign-post to where accidents and disasters have been assessed in the ES, such as flood risk, wind microclimate, transport, and construction. Where Geoenvironmental (Ground Conditions, Groundwater and Land Take and Soils) is scoped out of the ES, this should be explained within the introductory section(s) of the ES, in terms of how contaminated land (including UXO) would not pose a risk to major accidents and/or disasters.

For clarity, **LBTH does not agree to scope out major accidents and disasters from the ES and that relevant risks of accidents and disasters, such as those referred to above, are to be assessed within the ES. However, it is considered that a standalone major accidents and disaster aspect chapter is not required** given the nature and context of the Proposed Development and noting the Health and Safety Executive's consultation response confirms the Application Site does not life within the consultation distance of a major hazard site or major accident hazard pipeline.

The Applicant's attention is drawn to the IEMAs Major Accidents and Disasters in EIA Guide (2020), and the ES should align with the approaches set out within the guide, such as identifying source-pathway-receptor linkages of relevant topics.

5.6 Electronic (TV and Radio) Interference

The Scoping Report proposes to scope out assessment of Electronic (TV and Radio) Interference from the ES. This is on the basis that standard measures are deal with the relevant effects.

Given the number of TV transmitters and mobile network transmitters in the area, and that much of the surrounding area is taken up by industrial uses and by the River Lea, LBTH considers that there is unlikely to be significant effects on television and radio reception received within the surrounding area of the Application Site. Therefore, LBTH considers that a **Telecommunications assessment can be scoped out of the ES**.

Mitigation measures as referred to in Paragraph 475 of the Scoping Report to avoid likely significant effects must be clearly stated in the ES.

5.7 Waste

Paragraph 476 of the Scoping Report proposes to scope out an assessment of waste. This is on the basis that:

- Significant adverse effects on the local waste management infrastructure and landfill capacity (resulting from the waste expected to be generated during the demolition and construction of the Proposed Development) are considered unlikely, due to:
    - Mitigation measures (such as the provision of a CEMP and Site Waste Management Plan to include waste reduction and management objectives will be provided) that will be presented within the Demolition and Construction chapter of the ES; and
    - There being available capacity specified existing facilities and land suitable for new

waste facilities to provide sufficient capacity within the borough to manage waste apportionment targets (as set out within Paragraph 483 of the Scoping Report);

- Significant adverse effects on local waste management infrastructure and landfill capacity (resulting from the waste expected to be generated during the operation of the Proposed Development) are considered unlikely, due to:
    - A separate Operational Waste Management Strategy that will be prepared and submitted as a standalone document as part of the planning application; and
    - There being available capacity specified existing facilities and land suitable for new waste facilities to provide sufficient capacity within the borough to manage waste apportionment targets (as set out within Paragraph 483 of the Scoping Report).

Given the above, LBTH considers that a **Waste assessment and aspect chapter can be scoped out of the ES**. Noting that adherence to London Plan Policy SI7 diverting 95% of demolition and construction waste results in a negligible effect in accordance with IEMA guidance, and the operation of the Proposed Development is unlikely to significant effect landfill supply.

However, the Applicant is reminded that IEMA's Guide to: Materials and Waste in Environmental Impact Assessment considers materials to be a sensitive receptor, in addition to landfill capacity. Given that the Scoping Report does not consider materials, unless the Applicant can adequately justify that no likely significant effects will occur on materials during the demolition and construction of the Proposed Development, and once the Proposed Development is operational, LBTH considers that a **Materials assessment and aspect chapter should be scoped into the ES**.

All mitigation measures relied upon to avoid likely significant effects must be clearly stated in the ES.

The Applicant is reminded that the EIA Regulations require an estimate, by type and quantity, of expected residues and emissions, which includes quantities and types of waste produced during the demolition / construction and operation phases. This should be provided in introductory chapter of the ES, in addition to the mitigation measures included as part of the application to avoid significant effects in relation to waste as stated in the Scoping Report.

The Applicant should produce a Circular Economy Statement using the guidance in the London Plan Policy SI7. Adopting this approach will play a significant role in promoting resource efficiency and addressing the challenge of the climate emergency. Consideration should be given to the LBTH Waste Management Strategy 2018-2030.

5.8 Aviation

LBTH notes that the Scoping Report does not include a section on aviation a considering the Proposed Development potential effects on aviation safety, however Paragraph 41 of the Scoping Report states the Proposed Development is situated in a London City Airport safeguarding zone.

The Application Site is located approximately 3 km to the north west of London City Airport, and the maximum height of the Proposed Development is 96 m AOD, and therefore the Proposed Development is not anticipated to affect the current use of approach and/or departure procedures for London City Airport and **therefore Aviation can be scoped out of the ES**.

An aerodrome safeguarding report is to be prepared and submitted with the planning application to support the process of statutory consultation associated with the identified safeguarding requirement. This should assess physical safeguarding (buildings and cranes), and technical

safeguarding (communication, navigation and surveillance equipment), lighting, cranes and bird strike hazard.

Appendix: Methodology

Annex 1: EIA Scoping Report
Annex 2: EIA Scoping Opinion
Annex 3: EIA Scoping Opinion Response
Annex 4: Cumulative Schemes List and Map
Annex 5: Cumulative Schemes Assessment Matrix

Aberfeldy Village EIA Scoping Opinion Response

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

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

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

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

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

4.12 Cumulative Effects		
4.12.2	The cumulative effects assessments (both inter and intra-project assessment) should consider likely effects on specific receptors and or groups of receptors, in addition to general aspects of the environment. Cumulative effects assessments should not just consider whether the magnitude of effects is greater, but also other aspects such as whether the duration of effects on a receptor are increased. LBTH have reviewed the list of cumulative schemes provided in Appendix C of the Scoping Report and has identified the following schemes for inclusion / consideration in the cumulative effects assessment: • Areas 7 and IC Barking Road, Canning Town - 11/00662/LTGDC (within the London Borough of Newham Planning permission granted) • Blackwall Reach - PA/12/02752, PA/14/02480, PA/16/01958/P3 (planning permission granted) and PA/20/02371 (likely to be determined before the Proposed Development); • Aberfeldy Estate – PA/11/02716, PA/11/03548, PA/13/01844, PA/15/00002, and PA/15/01826 (planning permission granted); • 116-118 Chrisp Street - PA/14/02928 (planning permission granted); • Bromley by Bow North - PA/11/02423 (planning permission granted); • 43-45 Gillender Street - PA/19/01628 (planning permission granted); • Goodluck Hope - PA/19/02773 (likely to be determined before the Proposed Development); • 160 Chrisp Street - PA/15/00039 (Planning permission granted); • Bow Common – PA/19/02379 (Resolution to grant planning permission); • Stroudley Walk - PA/19/02292 (planning permission granted); • Blackwall Jetty - PA/21/00288 (likely to be determined before the Proposed Development); • Mulberry Place - PA/21/01304 (Scoping Opinion requested); • Land under the DLR bounded by Scouler Street, Aspen Way and Prestage Way - PA/19/02292 (planning permission granted); • Global Switch - PA/21/00986 (Could be determined before the Proposed Development); • 1 Paul Julius Close (Reuters) - PA/13/01861/A1 (planning permission granted); • North Quay - PA/20/01421/A1 (likely to be determined before the Proposed Development); • Tower Hamlets College, 112 Poplar High Street - PA/19/02067/NC (scoping opinion issued); • Chrisp Street Market – PA/21/01975 (scoping opinion requested); • Trinity Buoy Wharf - PA/17/00729 and PA/19/00957 (planning permission granted); and • The Silvertown Tunnel Order (2018).	Where relevant the cumulative schemes assessment considers potential impacts that may arise during the Proposed Development's peak construction period in combination with other developments that are also under construction at the same time. A scoping exercise has been undertaken which has identified cumulative schemes likely to be under construction at the same time as the Proposed Development. Further details in regard to this scoping exercise is presented within the **ES Volume 1, Chapter 2: Methodology**. The following has been considered when undertaking the scoping exercise: • The likelihood of the other cumulative schemes being constructed concurrently to the Proposed Development; • The likelihood that the same or similar HGV traffic routes as the Proposed Development will be used for the cumulative schemes; • The proximity of the cumulative schemes to the Proposed Development site and the potential for surrounding receptors to experience 'in combination' or 'cumulative' effects as a result of the Proposed Development being constructed concurrently with the cumulative schemes; and • The amount of information available to be assessed i.e. whether the cumulative schemes only have a scoping report and are therefore not able to be assessed in terms of massing studies. These additional schemes have been considered and the below responses relate to those which are not considered to be cumulative schemes for this Site. **Scheme** / **Response** Mulberry Place - PA/21/01304 (Scoping Opinion requested); — Although the Scoping Opinion has been submitted, there is insufficient information available to undertake an assessment of the cumulative effects of this scheme. Global Switch - PA/21/00986 (Could be determined before the Proposed Development); — Although the scheme is located nearby, the five level phased external plant has no cumulative interactions with the Proposed Development as it is not generating population or additional sensitive receptors. Noise generated from the external plant is considered too far to lead to an increase in dB when considering the noise environments between the Site and the cumulative scheme. Tower Hamlets College, 112 Poplar High Street - PA/19/02067/NC (scoping opinion issued); — Although the Scoping Opinion has been submitted, there is insufficient information available to undertake an assessment of the cumulative effects of this scheme. Chrisp Street Market – PA/21/01975 (scoping opinion requested); — Although the Scoping Opinion has been submitted, there is insufficient information available to undertake an assessment of the cumulative effects of this scheme.

Table 2: EIA Scoping – Topics Scoped In

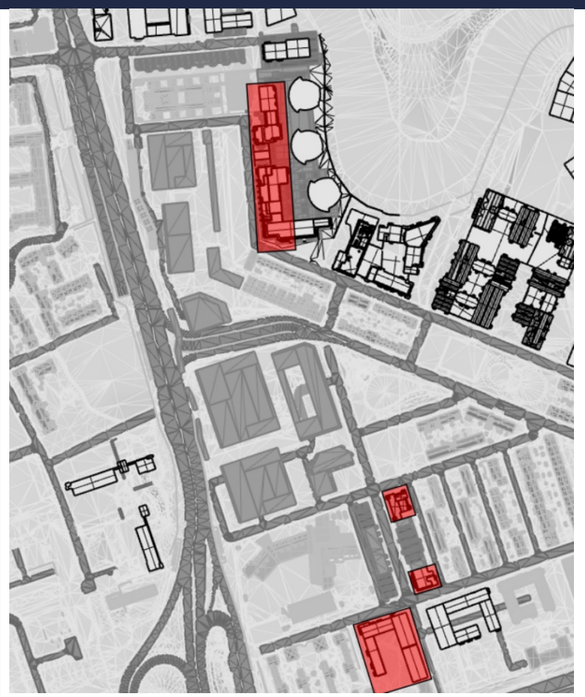
4.1 Air Quality		
4.1.2 General Comments	The ES is to ensure that realistic background air quality concentrations are used in the assessment, and a robust model verification exercise is undertaken. Any limitations should be clearly stated. It is considered that current baseline and future year projections are to be based on the LAEI (20 m2 grid reference) and Tower Hamlets monitoring data. LBTH notes that in addition to verifying modelling against existing monitoring data in the area, air quality monitoring for nitrogen dioxide will be undertaken at the Application Site (over a minimum period of three months), in order to provide further confidence in the modelled predictions. LBTH considers this to be appropriate.	During the assessment period between March 2020 and June 2021, travel had been significantly limited by restrictions that were implemented as part of the Government's response to the COVID-19 pandemic. Consequently this has affected transport movements at the time hence at the time of undertaking the baseline air quality work in early 2021, it was not considered representative to undertake air quality monitoring. Instead, existing LBTH monitoring data was used.
4.3 Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare		
4.3.2 General Comments	It is noted that light pollution is included in the aspect chapter title in the Scoping Report; however, this matter is dealt with in Paragraph 169 of the Scoping Report which provides a discussion proposing to scope out an assessment of light pollution due to the residential nature of the Proposed Development. LBTH agrees that this is acceptable for the residential element of the Proposed Development; however, LBTH notes that approximately 7,500 sqm GIA of non-residential uses (including restaurant, retail and office (Use Class E(a), E(b) and E(g))) will be provided. Therefore, LBTH expects that a light pollution assessment should be undertaken for the non-residential uses of the Proposed Development or justification should be provided in the ES, if it is considered that such an assessment is not required.	Light pollution is defined as any light emitting from artificial sources into spaces where it is unwanted, such as spillage of light from office or commercial buildings onto residential accommodation, where this would cause nuisance to the occupants The elements of the Proposed Development which are detailed comprise primarily residential uses which are not considered to be a source of light intrusion and therefore do not require assessment. The commercial uses proposed are not considered likely to results in any significant light intrusion effects, owing to the relative distance from sensitive uses and are therefore not assessed. As a mixed-use scheme, there is the potential for the proposed residential elements to be located within 20 meters of commercial buildings and thus considered future sensitive receptors in terms of light pollution. However, the non-residential uses of Proposed Development comprising commercial uses are currently proposed in outline and as such no light pollution assessment can be undertaken at this time. An assessment of the light pollution effects relies on the detailed design of the scheme, for both the commercial buildings that would emit the artificial lighting and the apertures of the proposed residential buildings. Owing to the application for the Proposed Development being partly in outline, the façade materials, including glazing, as well as the lighting design, internal layouts and room uses are not yet known for the outline element. As such, a full detailed analysis for solar glare and light pollution cannot be undertaken at this stage in respect of the outline element. Any emerging lighting strategy will be designed with respect to the ILP Guidance Notes and will ensure that any significant effects are mitigated as part of the detailed design development
	The study area and individual properties assessed should be clearly stated and justified within the ES and shown on a figure for ease of understanding. It is noted that a list of receptors to be considered has been provided in Paragraph 175 of the Scoping Report, however no figure is provided so the exact receptors to be assessed is not known. Reference is made to Aberfeldy Road, which is understood to refer to Aberfeldy Street, and Carndale House, which is understood to refer to Carradale House. Bromley Hall School, Poplar Baptist Church, River Thames and Tidal Tributaries SINC, and receptors on Brion Place should be identified as receptors.	A map of receptors with buildings, clearly identified, with naming corrections are provided within **ES Volume 1, Chapter 12: Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare** within Figures 12.1, 12.2 and 12.3. The additional buildings, Bromley Hall School, Poplar Baptist Church and receptors on Brion Place are considered in the Sensitive Receptors Section, with the likely significant effects considered in the Potential Effects Section. The River Thames is south of the Proposed Development and therefore not considered sensitive. Bow Creek / River Lea are Tidal Tributaries which are assessed as sensitive receptors.
4.3.4 Operation	The Applicant is also required to provide a summary table for daylight, which includes the following: - The receptor (i.e. each building); - The number of windows / rooms in the receptor tested; - The number of windows / rooms which meet the BRE criteria; - The number of windows / rooms which do not meet the BRE criteria, split by minor, moderate and major significance, as per the criteria outlined above; - The number of dwellings affected; and - Commentary on minor, moderate and major sunlight and daylight losses.	Information about dwellings is not always available and as such reporting by dwellings is not a viable option. A summary table has been provided within the ES chapter detailing the number of windows/rooms tested and affected per receptor, split by minor, moderate and major effects. The daylight and sunlight technical results report on the specific windows and rooms which impacts occur, which are mapped on corresponding illustrations whereby the individual effects can be identified.
4.5 Health		
4.5.2 General Comments	The Applicant is advised to consider integrating the HIA into the EIA to minimise duplication and facilitate enhanced consideration of health within the EIA as well as meeting the requirements of both the HIA policy and the EIA Regulations.	A table is provided in ***ES Volume 1, Chapter 2: EIA Methodology*** which provides reference to relevant information on human health located in the ES
	the introductory section of the ES should contain a table which provides a clear cross-reference to where the relevant information on human health is located in the ES, such as within the HIA, wind microclimate (including strong wind occurrences), daylight, sunlight and overshadowing, socio-economics, air quality, noise and vibration, transport aspect, ground conditions, water environment chapters of the ES.	The application is be supported by a detailed Health Impact Assessment in accordance with LBTH policy D.SG3. The scope of the HIA has been agreed with LBTH Health Impact Assessment Officer. The HIA will

	In accordance with LBTH policy D.SG3, and policy within the NPPF and London Plan, a **detailed** HIA is to be submitted in support of the planning application. Any likely significant effects identified within the HIA should be further assessed as part of the EIA. It should be noted that the emerging policy requires *'Developments of a scale referable to the Greater London Authority (as set out in legislation) are required to complete and submit a **detailed** health impact assessment as part of the planning application'*. Detailed HIAs **must be informed by sufficient consultation**, in order to identify the relevant health determinants for the Proposed Development and assess their impact. It is noted from Paragraph 221 of the Scoping Report that the scope of the detailed HIA has been discussed with the LBTH's HIA Officer (in May 2021). The required consultation is to also be agreed with LBTH's HIA Officer.	include reference to supporting documents (such as ES Chapters) to further understand methodology, approach as agreed with LBTH Health Impact Assessment Officer. Any likely significant effects identified within the HIA are included in the ES. The HIA utilises the Sports England's Active Design to evaluate the design and layout principles of the proposal. The Local Impact Area used in the HIA is commensurate with the appropriate impact areas used to assess the significance of effects across the range of health determinants and where possible is consistent with local impact areas used in the ES for such purposes.
	The HIA is to be structure around the following key themes, as identified within LBTH's HIA Guidance (2021): • Delivering healthy layouts; • Promoting neighbourhood cohesion; • Enabling active living; and • Creating the healthiest of environments.	
	The Applicant is reminded that all likely significant effects must be identified and assessed within the ES. The ES is to clearly state whether the HIA identified likely significant effects, and where such effects are assessed within the ES.	
	Community engagement will offer a qualitative impact analysis of those who will experience living on or near the Application Site and who might suffer or benefit from its many features and their combined health impact. While it might be difficult to quantify the impact of any single risk factor/determinant of health (as per HUDU checklist), it is therefore important for the Applicant to take into account the experience of the local population. The criteria questions in the Tower Hamlets HIA guidance can help inform consultation on health.	
	HIA has a broad remit to assess a number of determinants of health at building or site level including housing quality and design, access to healthcare and other social infrastructure, access to open space and nature, air quality, noise and neighbourhood amenity, active travel, community safety, access to healthy food, access to work and training, climate change. The HIA is to assess their impact on a range of health outcomes including physical, mental, environmental health as well as health equity and safety.	
	With regards to the HIA, evidence shows that design and layout have an impact on behaviour pattern. While the Applicant cannot anticipate the ways buildings and spaces are used or other lifestyle factors of future residents, the Applicant must ensure that the proposed site layout maximises the health benefits, promotes communal/open space promoting cohesion, enables active living and contributes to environmental sustainability, all key factors for health. The Applicant is reminded that the way buildings and spaces are used is also determined by their availability, accessibility, design and maintenance, all of which can be considered at planning stage. The analysis of health risk factors at various relevant spatial scales (room, building, street, site and neighbourhood levels) is required as a range of smaller and consistent negative design issues can potentially affect human health.	
	LBTH recommend the Applicant refers to Sports England's Active Design for instance to ensure that active design principles are embedded into the design and layout of their development to meet planning and transport objectives (see p. 56 Sports England's Active Design). Furthermore, the HIA will need to consider the impact not just on the Application Site but on the wider population. The Applicant must identify an impact area in view of the size of the development, the local demographics and existence of local infrastructure around the Application Site.	

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

4.8 Traffic and Transport		
4.8.2	Mitigation measures for buses, especially route 309 and any potential rerouting, should clearly identify how the measures will be secured and acknowledge where mitigation is within the Applicant's control and when it is not. Table 5 of the Scoping Report notes that during demolition and construction, severance and amenity, fear and intimidation will be assessed for local roads only. It also notes that severance, pedestrian and cyclist delay, vehicle and bus delay, amenity, fear and intimidation and accidents and safety will be assessed during operation. LBTH consider that pedestrian and cyclist delay, vehicle and bus delay, accidents and safety are to be scoped into the assessment during demolition, and construction. It is agreed that the assessment of hazardous loads can be scoped out of the ES on the basis on hazardous loads would be generated as a result of the Proposed Development.	A Traffic and Transport ES chapter is required to comply with specific national guidelines as set out in DMRB LA104 and the Guidelines for the Environmental Assessment of Road Traffic (GEART). The specific impacts to be assessed are set out in the standards and are as follows: • Severance • Driver Delay • Pedestrian Delay • Pedestrian Amenity • Fear and Intimidation • Accidents and Safety • Hazardous Loads Specific EIA thresholds for these impacts exist so that the magnitude and significance of the environmental impact can be determined in line with DMRB and GEART. However, pedestrians, cyclists, drivers, and public transport passengers can be included as separate receptors as part of the assessment so that the impacts as set out above on each of these receptor groups can be determined.
	LBTH considers that rail delay and the effects on public transport should be assessed for operation and, therefore, must be scoped in. As part of the assessment of public transport, station capacity assessments for London Underground and DLR stations, and line loading assessments are to be undertaken and agreed with LBTH and TfL.	Rail delay and "effects" on public transport are not included in national guidance and no EIA thresholds for these impacts exists. Therefore, they are not be included in the ES chapter. However, the impact of public transport demand on the capacity of the public transport network, including rail, forms part of the TA.
	No consideration has been given to junction capacity within the Scoping Report. This matter is considered to be scoped in unless it can be sufficiently justified that significant effects are not likely. The Applicant is advised to consult with LBTH and TfL in this regard.	The Proposed Development will not result in an increase in vehicle trips on the network. It is acknowledged that the proposed closure of the underpass will result in redistribution of traffic on the strategic network but a reduction in traffic on B125 Abbott Road will occur as well. Strategic modelling has been undertaken and microsimulation is underway which will assess the junctions that will be impacted by the closure of the underpass. The result of this modelling informs the driver delay and severance environmental impact assessment.
	In addition to the above, appropriate consideration must be given to the timeframe of when Abbott Road diversions will be delivered. For example, if Abbott Road will be closed to vehicular traffic early during the construction phase, then this must also be assessed during construction.	The peak construction traffic is expected to occur in April/May 2026 during Phase B. The underpass will not be closed until after the peak construction traffic has taken place. However the routing of vehicles will only change slightly with the closure of the underpass in future Phases with access from the A12 maintained via the re provided off-slip and egress from the site via B125 Abbott Road junction with the A13. The minor change in routing is not considered to have a material impact on construction traffic volumes along B125 Abbott Road, within other streets of the site or the strategic network.
	Proposed assessment scenarios set out: • Existing baseline year • Assessment baseline (do nothing) • Assessment with development (do something) • Existing baseline plus peak hour construction vehicle movements • Interim scenario with partial occupation and partial construction of the development	While data from an existing baseline year has been used to establish the assessment future baseline year (2031), it has not been assessed separately against severance, delay, etc. as EIA is concerned with the impact or change of a proposal against a do-nothing baseline in the same year. Our proposed methodology is in line with BMRB LA104 and the 1993 IEMA guidelines. Peak construction in 2026 encompasses construction of Phase B of the Proposed Development. In this phase, the Detailed Proposals (Phase A) of the Proposed Development would be operational. However, as the Proposed Development will re-provide parking at a lower level than existing Site no increase in traffic is expected as a result of Phase A operation and therefore this has not been explicitly assessed as part of this scenario. For Phase B construction, construction vehicles will access and egress the site via the A12/Lochnagar Street junction. The Interim scenario year of 2026 has therefore been used to illustrate the partial occupation and partial construction.
	The detailed assessment methodology for this aspect chapter and the TA should be agreed in consultation with transportation officers at LBTH and TfL. Details of the consultation undertaken should be set out in the ES. The Applicant is advised to agree the trip generation and any modelling scope with LBTH and TfL, prior to submitting the application.	Noted, extensive consultation has occurred and is ongoing with both LBTH and TfL.

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

		 Any others are unlikely to be affected by the development as they are too far away.
4.9.3	As stated in Paragraph 335 of the Scoping Report, effects during demolition and construction are to be assessed using professional judgement (qualitatively) within the ES, which is considered acceptable. For the avoidance of doubt, the ES should provide assessment of wind effects during construction utilising the worst-case scenario, such as with cranes in situ. It should be clear where professional judgement has been applied.	Noted, however, the demolition and construction milestone of “with cranes in situ” may not reflect the worst-case scenario for a specific site. Appropriate judgements have been applied.
4.9.4	LBTH consider that City of London (CoL) Microclimate Guidelines (August 2019), should inform the assessment methodology given the location of the Application Site is adjacent to in a significant growth area (as per the site allocation in Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020)). However, it is not considered that Annex A of the CoL Microclimate Guidelines can be applied to LBTH as the guidelines confirm these parameters have been scaled specifically for CoL. LBTH consider that any dining areas should meet the City Lawson Criteria for frequent sitting i.e. 2.5m/s.	The CoL WMG, including the criteria that are applied are derived specifically for the street-scape and uses of public realm within the City of London. This may be applicable to a certain extent in areas of LBTH such as Canary Wharf (i.e., predominantly office uses with small street patterns), however the Aberfeldy Estate has a very different environment. It is considered that the standard LDDC variant of the Lawson Comfort criteria, which already contains an appropriate threshold criteria for sitting use should be utilized. From a technical perspective, a number of the minimum technical requirements of the CoL guidelines are already considered in RWDI’s wind tunnel methodology.
	LBTH expects an initial assessment of the Proposed Development should be undertaken using Computational Fluid Dynamics (CFD), and that the results of the CDF analysis contribute to the design of the Proposed Development and/or the mitigation measures which may be required to achieve suitable conditions for the proposed uses on-site. LBTH expects wind tunnel testing will then be undertaken on the final scheme to inform the wind microclimate aspect chapter. Wind tunnel testing will be undertaken to assess wind conditions at various receptors’ location and the suitability of the intended uses. Scenarios to be tested are: • Baseline (Existing Application Site + Existing Surrounding Context); • Proposed Development (detailed element only) + Existing Surrounding Context; • Proposed Development (detailed and outline elements) + Existing Surrounding Context; • Proposed Development (detailed and outline elements + Future Surrounding Context (cumulative schemes); and	Initial CFD was not undertaken, however early wind tunnel studies were undertaken to inform the massing design. The wind assessment has been undertaken based on the agreed configurations and also an assessment of the illustrative scheme to provide comfort on the outline maximum parameters assessment. Further explanation of this approach is presented within ***ES Volume 1, Chapter 2: Methodology***.

	• Future Baseline (Existing Application Site + Future Surrounding Context).	
	If mitigation measures are required to ensure wind conditions are suitable for their intended use, wind tunnel testing of these measures is to be undertaken and any results provided in the ES. The ES should set out exactly what measures are required for mitigation and how these will be secured. It must be ensured that all mitigation measures and landscaping proposed and tested in the wind microclimate aspect chapter are proposed within the landscaping strategy, as there are often discrepancies where required mitigation measures are not brought forward in other planning application documents.	Mitigation principles and/or broad strategies could be proven against the illustrative scheme, however it remains the case that details associated with the scheme geometry and specific target uses across the site would be subject to change to be determined at reserved matters stages. Where required the detailed elements of the Proposed Development will be mitigated.
	The ES should consider whether future monitoring is required to test actual conditions of the Proposed Development.	Monitoring is typically only conducted on localised areas where anecdotally, wind issues or adverse effects on the environment associated with wind have been witnessed. It is impractical to conduct monitoring over large areas, where pedestrians and/or vehicles would be frequent also. Wind assessments are conducted utilising a significant period of statistical wind data also, therefore the timelines associated with monitoring to gather appropriate data could be extensive. Fortunately, with robust wind assessments having been conducted such manifestations of adverse wind effects are very rare, and typically occur on schemes where no assessment was originally carried out prior to its construction. It is therefore not anticipated that any monitoring would be required.
	A study area covering a 450 m radius from the centre of the Application Site will be used, which LBTH considers to be acceptable. The following plans should be included in the ES: • The intended uses of the Application Site (e.g. the open spaces, thoroughfares, entrances); • What conditions are being targeted (e.g. open space should be suitable for sitting); and • The mitigation measures relied upon. This allows the reader to understand the basis of the assessment and provides the opportunity to contest the uses and anticipated wind categories. For the avoidance of doubt, results are to be presented for both the windiest season, and summer season.	Figures of the intended uses of the Proposed Development have been included within the ES for the outline elements (based on the illustrative scheme) and the detailed elements in particular, including seasonal considerations where applicable. Target criteria forms part of the methodology and discussion sections of the accompanying reporting. The mitigation measures to be relied upon have been clearly outlined within the **ES Volume 1, Chapter 13: Wind Microclimate**, notwithstanding the previously mentioned approach with regards to the maximum parameters.
	Any spaces that are proposed as part of the Proposed Development, and that are relied upon by the Applicant to provide amenity, should have wind conditions suitable for this use.	Amenity spaces within the Proposed Development have been assessed as part of the wind microclimate assessment, with a focus upon summer season conditions when these spaces are to be most frequently used. For these areas, a mixture of standing and sitting conditions is considered appropriate in more open amenity spaces, and for private balconies, standing is appropriate where no seating is provided. In all cases, these uses must be considered safe with no exceedances annually of the distress criteria for all seasons. Where seating is specifically provided, conditions suitable for sitting (during the summer season) will be sought.
	The assessment should demonstrate how climate change has been considered within the Wind Microclimate aspect chapter of the ES, noting that the UK Climate Projections 2018 (UKCP18) states “an increase in near surface wind speeds over the UK for the second half of the 21st century for the winter season [is predicted] when more significant impacts of wind are experienced. This is accompanied by an increase in frequency of winter storms over the UK” Whilst it is acknowledged that “the increase in wind speeds is modest compared to interannual variability for the PPE-15”, more extreme wind conditions are predicted overall.	In combination climate change effects are presented in **ES Volume 1, Chapter 9: Climate Change.** It is worth noting that the data used within the analysis does statistically identify trends over the period for when the data is collected. As such, consideration of these trends are inherently included within the wind microclimate assessment included within the ES. UKCP18 and not UKCP09, informs the climate change scenario, as noted.
4.11 Built Heritage		
	The Scoping Report includes a list of the heritage assets most directly affected by the Proposed Development within Paragraph 371 and 372 of the Scoping Report and shown within Figure 10, noting that all heritage assets to be assessed are yet be agreed with LBTH. LBTH consider that a zone of visual influence is provided to inform the heritage assets to be scoped into the assessment. However, from an initial consideration it is considered that the following should also be assessed: • Maritime Greenwich World Heritage Site and Scheduled Monument; • Three Mills Conservation Area; • Limehouse Cut Conservation Area; • Lansbury Conservation Area; • Naval Row Conservation Area;	**Annex 6** of the **ES Volume 2, Townscape Visual Impact Assessment and Built Heritage Assessment – Part 1** presents the Zone of Theoretical Visibility (ZTV), which has been used to establish heritage assets with the potential to be directly affected by the Proposed Development. The full list of heritage assets assessed within the ES are presented within **ES Volume 2, Townscape Visual Impact Assessment and Built Heritage Assessment - Part 2**

	• All Saints Church Conservation Area; • Northern portal and parapet to the Blackwall Tunnel (Grade II); • East India Dock Wall and Gateway (Grade II); • Poplar Baths (Grade II); • Statue of Richard Green (Grade II); • Church of St Saviours (Grade II); • Twelvetrees Crescent Bridge (Grade II); • Group of Gasholders former Bromley-by-Bow gasworks (Grade II); • Northern Ventilation Shaft to the Blackwall Tunnel (Grade II); • Dry Dock at Blackwall Engineering (Grade II); • Blackwall Pier (Grade II); • Trinity House (Grade II); • Royal Oak Public House (Grade II); • 162 St Leonards Road Locally listed building; • 159-167 St Leonards Road locally listed buildings; • Dowgate Wharf, 22 Gillender Street (Grade II) and 21-22 Gillender Street locally listed buildings • 18 Follet Street locally listed building; • Mission House locally listed building; • St Freideswide Halls locally listed building; and • Heritage assets within the identified Conservation Areas	

Table 3: EIA Scoping – Topics Scoped Out

5.1 Ecology and Biodiversity		
5.1	LBTH notes that the Preliminary Ecological Appraisal (PEA) (presented in Appendix E of the Scoping Report and upon which the above justification is based) was undertaken for a site area of 7.35 ha, rather than the 9.69 ha area of the Application Site, with the main section of the Application Site not having been included within the PEA being Jolly's Green. LBTH considers that whilst the wildlife habitat of Jolly's Green is unknown, it is by far the most biodiverse area within the Application Site boundary and the Applicant should note that there have been several recent biodiversity enhancement projects at Jolly's Green, led by Trees for Cities, working with the local community. LBTH considers that the Applicant should update the PEA with the correct Application Site boundary, to enable LBTH to successfully consider whether an Ecology and Biodiversity aspect chapter can be scoped out of the ES. Noting that the Scoping Report does not confirm whether the areas of open space within the Application Site are to be retained as part of the Proposed Development. LBTH therefore, requires an **Ecology and Biodiversity aspect chapter to be scoped into the ES**, unless the Applicant can provide the updated PEA including Jolly's green and further details regarding the proposals for the areas of open spaces to demonstrate likely significant effects are not likely to occur.	The PEA submitted alongside the scoping report did not include the final application site boundary. As the existing Jolly's Green open space is not included within the application site / red line boundary and the existing open spaces are to be improved, it is considered that there is no requirement for this aspect to be included within the ES. The Proposed Development is unlikely to result in significant effects. An updated PEA which reflects the final red line Site boundary has been prepared and is submitted in support of the planning application.
	The Proposed Development has the potential to enhance biodiversity and achieve biodiversity net gain through biodiverse roofs and other biodiversity enhancements, which will be required in accordance with the relevant planning policy. A Biodiversity Net Gain assessment is to be undertaken. Ecological enhancements should contribute to the local biodiversity action plan (LBAP).	The Biodiversity Net Gain Assessment has been prepared for the Site and accompanies the Planning Application.
5.3 Geoenvironmental (ground conditions, groundwater, land take and soils)		
	For the Proposed Development, key mitigation and management controls should form part of a CEMP for the demolition and construction works and it is noted that the Applicant states in Paragraph 217 of the Scoping Report that this would be prepared in advance of any works commencing on-site. This should be presented in the ES to help define the policies, procedures, and management framework for the implementation of any identified specific geoenvironmental management and mitigation controls and monitoring.	An Outline CEMP is appended to the ES within ES Volume 3, Appendix: Demolition and Construction – Annex 1.
5.5 Project Vulnerability		
	LBTH does not agree to scope out major accidents and disasters from the ES and that relevant risks of accidents and disasters, such as those referred to above, are to be assessed within the ES. However, it is considered that a standalone major accidents and disaster aspect chapter is not required given the nature and context of the Proposed Development and noting the Health and Safety Executive's consultation response confirms the Application Site does not life within the consultation distance of a major hazard site or major accident hazard pipeline.	A review of the IEMA guidance (2020) 'Major Accidents and Disasters in EIA: A Primer has been undertaken, and the approach which was followed in the EIA Scoping Report is considered to align with this new guidance. As per the guidance, the Proposed Development has been screened to determine its potential to result in likely significant effects from major accidents and natural disasters. It is considered the Proposed Development would be unlikely to result in significant effects from most major accidents and natural disasters. The potential for strong winds is considered within **ES Volume 1, Chapter 11: Wind Microclimate** and any potential for Solar Glare is considered within **ES Volume 1, Chapter 10: Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare** as relevant)
5.7 Waste		
5.7	"… the Applicant is reminded that IEMA's Guide to: Materials and Waste in Environmental Impact Assessment considers materials to be a sensitive receptor, in addition to landfill capacity. Given that the Scoping Report does not consider materials, unless the Applicant can adequately justify that no likely significant effects will occur on materials during the demolition and construction of the Proposed Development, and once the Proposed Development is operational, LBTH considers that a **Materials assessment and aspect chapter should be scoped into the ES**.	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'[1] and within the LBTH and London. In accordance with IEMA's guide to Materials and Waste in Environmental Impact Assessment[2], 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"*[3]; for example, choosing to refurbish an existing building, rather than demolish it;

[1] Defined by IEMA's guide to Materials and Waste in Environmental Impact Assessment (2020) as 'waste' materials that go through an acceptable recovery process, to lose their status as 'waste' and become materials for other uses.
[2] IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment.
[3] IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 19).

		• Secondary mitigation measures: are “foreseeable actions brought out by the environmental assessment process, and that have not previously been achieved through primary and tertiary mechanisms”[4]; for example, the implementation of a Procurements Strategy or Construction Environmental Management Plan (CEMP) (or equivalent) or Operational Waste Management Strategy; and • Tertiary mitigation measures: are “those that are in place with or without the iterative EIA process” and include “those that will be undertaken to meet existing legislative requirements, of those that are considered standard practices used to manage commonly occurring environmental effects” [5]; for example, sending waste to active and permitted waste management sites, which have to adhere to the requirements of the Environmental Permitting Regulations[6], 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 Specification[7] 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 scoped 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.

[4] IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 27).
[5] IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 20).
[6] The Environmental Permitting (England and Wales) Regulations 2016
[7] BRE, (2009); The Green Guide to Specification, Fourth Edition.

Appendix: Methodology

Annex 1: EIA Scoping Report
Annex 2: EIA Scoping Opinion
Annex 3: EIA Scoping Opinion Response
Annex 4: Cumulative Schemes List and Map
Annex 5: Cumulative Schemes Assessment Matrix

APPENDIX C– Cumulative Schemes

Cumulative Scheme List

Table C1 Cumulative Schemes

Ref.	Name/Address	Application Number	Scheme Description	Status
1	Blackwall Reach The Robin Hood Gardens Estate together with land south of Poplar High Street and Naval Row, Woolmore School and land north of Woolmore Street bounded by Cotton Street, East India Dock Road and Bullivant Street	PA/12/00001/P0	Outline application for alterations to and demolition of existing buildings, site clearance and ground works and redevelopment to provide: Up to 1,575 residential units (up to 191,510m^2 GEA - Use Class C3); Up to 1,710 m^2 (GEA) of retail floorspace (Use Class A1-A5); Up to 900m^2 of office floorspace (Use Class B1); Up to 500m^2 community floorspace (Use Class D1); Replacement school (up to 4,500m^2 GEA - Use Class D1); Replacement faith building (up to 1,200m^2- Use Class D1) The application also proposes an energy centre (up to 750m^2 GEA); associated plant and servicing; provision of open space, landscaping works and ancillary drainage; car parking (up to 340 spaces in designated surface, podium, semi-basement and basement areas plus on-street); and alterations to and creation of new vehicular and pedestrian access routes. All matters associated with details of appearance, landscaping, layout and scale and (save for the matters of detail submitted in respect of certain highway routes, works and/or improvements for the use by vehicles, cyclists and pedestrians as set out in the Development Specification and Details of Access Report) access are reserved for future determination and within the parameters set out in the Parameter Plans and Parameter Statements	Permission Granted by LBTH March 2012 Commenced
		PA/12/02752	Submission of reserved matters pursuant to condition E5 of outline planning permission dated 30th March 2012, reference PA/12/00001 for 98 new homes; 500m^2 community centre; 838m^2 office space and a 954m^2 mosque (i.e. for building parcels A1, A2 and B within Development Zone 1, excluding Parcel R 'Phase 1A') comprising layout, scale and appearance of the buildings, the means of access thereto and the landscaping as well as approval of details of vehicular and cycle parking provision, servicing and refuse collection and associated ancillary development.	Decided Permit
		PA/14/02480	PA/14/02480/P2 | Reserved matters application pursuant to condition L5 of outline planning permission dated 30th March 2012 (PA/12/00001/LBTH) for 242 new homes, 635m^2 of commercial floorspace (Use Class A1 and A3) (i.e. for building parcels G, H and L within Development Zone 3 "Phase 1B"), comprising layout, scale and appearance of the buildings, the means of access thereto and landscaping and refuse collection and associated ancillary development.	Decided Permit
		PA/16/01958/P3	Details of all reserved matters (Access, Appearance, Landscaping, Layout and Scale) pursuant to outline planning permission ref PA/12/00001, dated 30/03/2012, relating to the following areas of the Blackwall Reach development: i) Building Parcels C1, C2, C3 and D within Development Zone 2 ii) Landscaping and public realm within Development Zone 2, including works to the retained Millennium Green Comprising 268 residential units (Use Class C3) within	Decided Permit

			4 buildings of up to 10 storeys in height, with associated landscaping, public realm and other ancillary works.	
		PA/20/02371	Details of all reserved matters (Access, Appearance, Landscaping, Layout and Scale) pursuant to outline planning permission ref. PA/12/00001, dated 30th March 2012, relating to Phase 3 and the following areas of the Blackwall Reach Regeneration Project: i.Building Parcels E1, E2, E3, E4, F1, F2 and F3; ii.Landscaping, Playspace and Public Realm Works within Development Zone 2, including works to the retained Millennium Green Comprising 315 new residential homes, a café/restaurant, concierge and ancillary gymnasium for residents within 2 main building parcels between 6 and 12 storeys in height with landscaping, children's playspace, public realm, car and cycle parking, refuse and recycling facilities and other associated works. This application is accompanied by an Environmental Statement Addendum | Blackwall Reach Phase 3 (Building Parcels E1, E2, E3, E4, F1, F2, and F3 of Development Zone 2) Robin Hood Gardens East, Robin Hood Lane, London E14	Registered
2	Castle Wharf Esso Petrol Station, Leamouth Road, London, E14 0JG	PA/16/01763/A1	Redevelopment of the former Service Station site with a residential led mixed use development, comprising residential units, together with 295m^2 of D1 floorspace, 81m^2 of flexible non-residential floorspace (Use Classes A1, A2, A3, B1, D1 and D2), 36m^2 café floorspace (Use Class A3), set across two main buildings including a 24 storey tower with stepped blocks of 20, 17, 11 and 8 storeys, linked by a 2 storey podium at ground level, with a single basement level, landscaping and associated amenities.	Permission Granted October 2017 by LBTH Under Construction
3	Ailsa Wharf, Ailsa Street, London	PA/16/02692 & PA/18/03461	Demolition of existing structures/buildings and the redevelopment of the site for a mixed-use scheme providing 785 residential units (C3) and 2,954m^2 GIA commercial floorspace (A1/A3/B1/D2) within a series of thirteen building blocks varying between 3 and 17 storeys (Maximum AOD height of 59.9); the creation of a new access road and the realignment of Ailsa Street; the provision of cycle and car parking spaces; and associated site-wide landscaping and public realm works.	Permission Granted October 2018 by LBTH Commenced
4	Imperial 2 (formerly Clockhouse and Access House), Bromley by Bow, London, E3 3AE	17/00364/FUL 18/00572/NMA, & 18/00575/NMA 17/00344/FUL	Full planning application for the demolition of the existing buildings on site and the construction of a residential-led mixed use scheme comprising a series of buildings ranging from one to 27 storeys in height to provide 3,570m^2 of flexible community, commercial and retail floorspace (Use Classes A1, A2, A3, A4, B1 and/or D1) at ground and mezzanine floor level, 491 residential units (Use Class C3) on the upper floors, parking/refuse/servicing at basement and ground floor, energy centre, communal amenity areas, and all associated landscaped public open space.	Permission Granted September 2018 by LLDC Under Construction
5	Chrisp Street Market, Chrisp Street, London	PA/16/01612/A1	Comprehensive redevelopment of the site (including existing car park) comprising the demolition of existing buildings with the exception of the Festival of Britain buildings, Clock Tower and Idea Store; erection of 19 new buildings ranging from 3 to 25 storeys (up to a maximum AOD height of 88m) providing 643 residential units (C3 Use Class) (including re-provision of 124 affordable residential units); existing market enhancement, including new canopy and service building; refurbishment of retained Festival of Britain buildings; reconfiguration and replacement of existing and provision of new commercial uses including new cinema (D2 use class); alterations and additions to existing Idea Store for community use and multi-function space (D1 Use Class); flexible affordable workspace/ community space (B1/D1 Use Class); office space (B1 use class); retail, financial and professional services and cafe/ restaurant floor space (A1 - A3 Use Class), including A1 food store; public house (A4 Use Class); hot food takeaway floor space (A5 Use Class); upgrade and provision of new public open space including child play space; new public realm, landscaping works and new lighting;	Permission Granted March 2019 by LBTH Not Commenced

			cycle parking spaces (including new visitor cycle parking); and provision of disabled car parking spaces. (Reconsultation due to revised submission documents that take in to account Grade II Listed status of the clock tower and the Festival Inn pub. Also changes to housing mix and child play space. Additional documents uploaded since the last letter was sent.) The application is accompanied by an Environmental Impact Assessment.	
		PA/14/02928/A1	Demolish Public House (Class A.4) and Former Tyre and Exhaust Centre Building Class B.1/B.2), Erect Mixed-Use Development Comprising Part 5, Part 10, Part 13 Storey Block of 53 Flats (Class C.3) with Ground Floor Commercial Unit (Flexible Permission - Classes A1/A2/A3/A4), and Associated Cycle and Refuse Storage Facilities, Lay Out Amenity Areas and Electricity Sub-Station, Stop Up Existing Accesses, Form New Vehicular and Pedestrian Accesses onto Chrisp Street, and Create 3 Accessible Parking Spaces on Chrisp Street.	Permission granted by LBTH Decided Permit
		PA/15/00039/A1	Demolition of existing buildings on the site and redevelopment to provide new buildings ranging from three to twelve storeys to provide 254 residential units (comprising 99 x 1 bed; 100 x 2 bed; 51 x 3 bed: 4 x 4 bed), together with associated car parking, amenity space, child playspace and infrastructure works.	Permission granted by LBTH Decided Permit
		PA/21/01975	This application is not currently on the planning portal	N/A At this point it cannot be assessed as no information is available
6	Barrett Industrial Estate, 20-22 Gillender Street, London	PA/18/00528/A1 & PA/19/00914	Demolition of the existing buildings, with the exception of 21-22 Gillender Street (Magnolia House), and redevelopment of the site to provide 307 residential units (Use Class C3), 1,815m^2 of commercial floorspace (Use Class B1) and 100m^2 of flexible commercial/retail floorspace (Use Class A1/A3/B1) within three buildings of 8 storeys (42.9m AOD), 17 storeys (67.0m AOD) and 20 storeys (78.5m AOD) with public and private amenity spaces, together with disabled car parking, cycle parking and associated landscaping.	Permission granted November 2018 by LBTH Commenced
		PA/18/00520/NC (related listed building consent)	Listed Building Consent for remedial works to Grade II listed wall that forms the north wall of the Dowgate Wharf P B Burgoyne and Company Limited Warehouse (List Entry UID: 1065050) in association with redevelopment of the site at 20 -22 Gillender Street for demolition of the existing buildings, with the exception of 21-22 Gillender Street (Magnolia House), and redevelopment of the site to provide 307 residential units (Use Class C3), 1,815m^2 of commercial floorspace (Use Class B1) and 100m^2 of flexible commercial/retail floorspace (Use Class A1/A3/B1) within three buildings of 8 storeys (42.9m AOD), 17 storeys (67.0m AOD) and 20 storeys (78.5m AOD) with public and private amenity spaces, together with disabled car parking, cycle parking and associated landscaping.	
7	Hercules Wharf, Castle Wharf and Union Wharf, Orchard Place, London, E14	PA/14/03594/A1, PA/17/02292 & PA/18/02805	Demolition of existing buildings at Hercules Wharf, Union Wharf and Castle Wharf and erection of 16 blocks (A-M) ranging in height from three-storeys up to 30 storeys (100m) (plus basement) providing 834 residential units; Retail / Employment Space (Class A1 - A4, B1, D1); Management Offices (Class B1) and Education Space (Class D1); car parking spaces; bicycle parking spaces; hard and soft landscaping works including to Orchard Dry Dock and the repair	Permission granted September 2016 by LBTH Under Construction

			and replacement of the river wall. Listed Building Consent application - Works to listed structures including repairs to 19th century river wall in eastern section of Union Wharf; restoration of the caisson and brick piers, and alteration of the surface of the in filled Orchard Dry Dock in connection with the use of the dry docks as part of public landscaping. Works to curtilage structures including landscaping works around bollards; oil tank repaired and remodelled and section of 19th century wall on to Orchard Place to be demolished with bricks salvaged where possible to be reused in detailed landscape design. The application is accompanied by an Environmental Impact Assessment Amended proposal: A reduction of storeys to Blocks B, C, E, F and J, a reduction in number of residential units to 804, an increase in commercial floorspace, alterations to the mix of proposed residential units including a reduction in studio and one bed units and an increase in 3 and 4 bed units. Further integration of door step play space and mitigation measures in relation to Orchard Wharf including the change of use of three town houses in Block M from residential to commercial floor space and the addition of panels to the south and south-west balcony sides on Blocks J and K.	
		PA/19/02773	Minor material amendment to condition no. 2 (Approved Documents and Plans) of planning permission ref: PA/17/02292, Dated 08/05/2018 Amendments include Condition 2 - Approved Documents and Plans	Permission granted by LBTH Registered
8	Cody Dock 11c South Crest, Canning Town, London, E16 4TL	17/03659/OUT	Outline planning permission (with all matters reserved) for up to 1,500m^2 of employment floorspace (Use Class B1 b/c), up to 500m^2 of employment floorspace (Use Class B2), up to 50m^2 ancillary community and exhibition space (Use Class D1), up to 200m^2 ancillary restaurant/cafe space (Use Class A3), public toilets, dockside storage space, boat parking, car parking, cycle parking, and ancillary hard and soft landscaping. Full planning permission for up to 500m^2 employment floorspace (Use Class B1 b/c), up to 60m^2 employment floorspace (Use Class B2), up to 700m^2 work/live mooring space (Use Class Sui Generis) and ancillary access pontoon, up to 50m^2 ancillary community space (Use Class D1), a pedestrian footbridge, one mooring for a commercial passenger vessel, two moorings for visitor vessels, a composter, and ancillary hard landscaping and soft landscaping.	Permission Granted April 2019 by LBN Not Commenced
9	Former Parcel Force Depot, Street, Canning Town, London, E16 4SB [2.5km from site]	17/01847/OUT	Hybrid planning application comprising: Detailed planning application for Phase 1 with works to include: The proposed demolition of existing buildings and structures, The erection of buildings, including tall buildings, comprising: 1,020 Residential Units (Use Class C3) 689m^2 (GEA) of Business Floorspace (Use Class B1); 5,400m^2 (GEA) of Retail Floorspace (Use Class A1-A4); and 12,004m^2 (GEA) of Community and Leisure Floorspace including a Secondary School (Use Class D1 and D2). Associated infrastructure, including a new bridge connection to West Ham Station and two footbridges across Manor Road; Alterations to the existing access road and vehicle bridge; Streets, open spaces, landscaping and public realm; Car, motorcycle and bicycle parking spaces and servicing spaces; Utilities including energy centre and electricity substations; and Other works incidental to the proposed development Outline planning application (all matters reserved) for the balance of the site for: The proposed demolition of existing buildings and structures; The erection of buildings, including tall buildings, comprising: Residential Units (Use Class C3); Business Floorspace (B1); Retail (A1-	Permission Granted August 2018 by LBN Commenced

			A4); Community and Leisure (D1 and D2); and Associated infrastructure; Streets, open spaces, landscaping and public realm; Car, motorcycle and bicycle parking spaces and servicing spaces; Utilities including electricity substations; and Other works incidental to the proposed development.	
10	Anchorage House, 2 Clove Crescent, London, E14 2BE	PA/16/01061/A1	Change of use at part ground floor level from Class B1 Office to a mix of flexible Class B1, A1, A3, A4 and D2 uses, the infill of the ground floor colonnades and the construction of a two storey podium at the south east corner of the building providing additional Class B1 Office space at first floor level, and associated alterations and landscaping.	Permission Granted July 2016 by LBTH Not Commenced
11	Wood Wharf, Prestons Road	PA/13/02966/P0	Outline planning permission for comprehensive mixed use redevelopment of Wood Wharf comprising: Demolition of existing buildings and structures, including dwellings at Lovegrove Walk; The erection of buildings, including tall buildings, and basements comprising: Up to 3,610 residential units (C3); Hotel (C1); Business floorspace (B1); Retail (A1-A5); Community and Leisure (D1 and D2); Sui Generis uses including Conference Centres, Theatres, Launderettes, and Data Centres Minimum commercial floorspace would be 165,000m^2 GIA; Associated infrastructure, including the creation of structures in Blackwall Basin, the Graving Dock, and South Dock; Streets, open spaces, landscaping and public realm; Bridge links; Car, motorcycle, and bicycle parking spaces, servicing; Utilities including energy centres and electricity substation(s); and Other works incidental to the proposed development.	Permission granted December 2014 by LBTH Under Construction
12	Brunel Street Works, Canning Town Area 8 Bounded by Peto Street North and Victoria Dock Road Sivertown Way, Canning Town	16/03428/FUL	Detailed planning permission for mixed use development to provide 975 residential units (Use Class C3), A 152 bedroom hotel (Use Class C1), A 3,000m^2 (GIA) of flexible commercial floor space (Use Classes B1 (A,B&C), A1-A4, D2 and a nursery within Use Class D1) including a foodstore of up to 550m^2, An enhanced public realm with cycle ways, tree planting and public squares, amenity space, car parking, cycle parking, refuse stores and servicing arrangements and all associated works. Relocation of existing electricity substation. (This major application is accompanied by an Environmental Statement for the purposes of Environmental Impact Assessment)	Permission granted October 2017 by LBN Under Construction
13	Leven Road Gasworks, Poplar Gas Works, Leven Road, London	PA/18/02803/A1	A hybrid planning application (part outline/part full) comprising: 1.) In Outline, with all matters reserved apart from access, for a comprehensive mixed-use development comprising a maximum of 195,000m^2 (GEA) (excluding basement and secondary school) of floorspace for the following uses: Residential (Class C3); Business uses including office and flexible workspace (Class B1); Retail, financial and professional services, food and drink uses (Class	Permission granted October 2019 by LBTH Commenced

			A1, A2, A3 & A4); Community, education and cultural uses (Class D1); A secondary school (Class D1) (not included within the above m^2 GEA figure); Assembly and leisure uses (Class D2); Public open space including riverside park and riverside walk; Storage, car and cycle parking; and Formation of new pedestrian and vehicular access and means of access and circulation within the site together new private and public open space. 2. In Full, for 66,600m^2 (GEA) of residential (Use Class C3) arranged in four blocks (A, B, C and D), ranging from 4 (up to 23m AOD) 5 (19.7m AOD), 6 (up to 26.9m AOD), 8 (up to 34.1m AOD), 9 (up to 36.3m AOD) 12 (up to 51.3m AOD) and 14 (57.6m AOD) storeys in height, up to 2700m^2 GIA of office and flexible workspaces (Class B1), up to 500m^2 GIA community and up to 2000m^2 GIA leisure uses (Class D1 & D2), up to 2500m^2 GIA of retail and food and drink uses (Class A1, A2, A3 and A4) together with access, car and cycle parking, energy centre, associated landscaping and new public realm, and private open space. Further explanation (not forming part of the formal description of development set out above): Further details submitted with the application explain that the Proposed Development could deliver up to 2,800 new homes of which 577 new homes are included in the Full component of the Application (Phase 1), at least 1ha Public Park; and a maximum of 0.5 hectares of land secured for a secondary school. The application is accompanied by an Environmental Statement.	
14	267-269 East India Dock Road, London, E14 0EG	PA/19/01838/A2	Internal and external alterations to the existing residential units at no. 267 East India Dock Road and proposed erection of a 163-bedroom hotel (C1 use class) comprising of a part four, and part-eighteen storey building over basement, with associated roof top plant room, ground floor servicing, car and bike parking and landscaping.	Permission granted November 2020 by LBTH Not commenced
15	(Former Poplar Bus Depot), Leven Road, London, E14 0LN	PA/19/02148/A1	Part retention, part alteration, and part demolition of the existing boundary walls and the former tram shed depot arches, and retention of the three storey office building. Demolition of the remainder of the existing warehouse and the redevelopment of the site to provide 547 residential units (Class C3), 3,492m^2 (GIA) of flexible space comprising of a mix of: office; retail; professional services; restaurant/bar; community space; and leisure space (Classes B1, A1, A2, A3, A4, D1 and D2) within buildings ranging from 3 storeys (20.2m AOD) to 20 storeys (72.7m AOD), with associated parking, landscaping, public realm and all associated works. This application is accompanied by an Environmental Statement.	Permission granted October 2020 by LBTH Not commenced
16	Islay Wharf, Lochnagar Street	PA/19/01760	Demolition of existing warehouse building and redevelopment of the site for mixed use development comprising two blocks ranging in height between 12 storeys and 21 storeys, accommodating 351m^2 of flexible uses classes (Class A1, A2, B1, D1, D2) on ground floor and mezzanine with associated public realm works and residential accommodation (Class C3) on the upper floors providing 133 residential units.	Permission granted November 2020 by LBTH Not commenced
17	London Docklands Travelodge Hotel, Coriander Avenue, London, E14 2AA	PA/18/03088/A1	Outline application (with all matters reserved) for the demolition of existing Travelodge Hotel (Use Class C1) and erection of a data centre (Use Class B8).	Permission granted December 2019 by LBTH Not commenced
18	Site north west of Leamouth Road Roundabout, Leamouth Road, London	PA/18/03089	Erection of 19 storey building (up to maximum height of 64.250 metres AOD) to provide a new 350 room hotel (Use Class C1) together with ancillary restaurant and bar, car parking, cycle parking and landscaping.	Permission granted December 2019 by LBTH Commenced

19	300 Manor Road, Land Comprising Former HSS Site And 300 Manor Road Canning Town London	18/03506/OUT	Redevelopment of land bounded by Manor Road, (i) outline planning permission for up to 449 dwellings (Class C3), up to 1,845m^2 of commercial (Class B1) and retail (Class A1/A2/A3/A4) floorspace; car parking, open space and associated infrastructure works; (ii) full planning permission for Phase 1 for 355 dwellings (Class C3), 555m^2 of commercial (Class B1) and retail (Class A1/A2/A3/A4) floorspace; car parking, open space and associated infrastructure works. This application is accompanied by an Environmental Statement for the purposes of Environmental Impact Assessment under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017	Permission granted November 2020 by LBN Not commenced
20	Aberfeldy Estate, Abbott Road, London, E14	PA/11/02716/P0	Outline planning application (all matters reserved) for the mixed-use redevelopment of the existing Aberfeldy estate comprising: Demolition of 297 existing residential units and 1,990m^2 of non-residential floorspace, including shops (use class A1), professional services (use class A2), food and drink (use class A3 and A5), residential institution (use class C2), storage (use class B8), community, education and cultural (use class D1); and creation of 1,176 residential units (Use Class C3) in 15 new blocks between 2 and 10 storeys in height plus 1,743m^2 retail space (Use Class A1), professional services (Use Class A2), food and drink (Use Classes A3 and A5) and 1,786 community and cultural uses (Use Class D1) together with a temporary marketing suite (407m^2), energy centre, new and improved public open space and public realm, semi-basement, ground and on-street vehicular and cycle parking and temporary works or structures and associated utilities/services.	Permission granted June 2021 by LBTH Commenced Phases 1-3a of the Aberfeldy Village masterplan complete Phase 3b works commenced
		PA/11/03548/P1	Erection of three blocks between 4 and 10 storeys on the corner of Abbott Road and East India Dock Road to provide 342 new residential units, 352m^2. new retail floorspace (Use Classes A1 and A3), a marketing suite of 407m^2. (Use Class A2), semi-basement and ground floor parking, cycle parking, landscaped public open space and private amenity space and other associated works. Proposal constitutes Phase 1 of application PA/11/02716.	Permission granted under appeal (LBTH) Decided Permit
		PA/13/01844/P2	Submission of reserved matters to condition 1 (details of siting, layout, scale, design and external appearance of the building, the means of access thereto and landscaping of the site) and condition 43 (reserved matters further information) for the development of Phase 2 of the Aberfeldy New Village Outline Planning Permission (PA/11/2716) approved on 20 June 2012 comprising demolition of Helen Mackay House, Jervis Bay House, Gaze House and Richie House and creation of two residential blocks between 4 to 8 storeys , with a total of 219 new dwellings (16 x studio; 97 x 1 bed; 92 x 2 bed; 7 x 3 bed; 2 x 4 bed; 5 x 5 bed), new public open space, car parks, cycle parking and temporary works of structures and associated utilities/services required by the development.	Permission granted under appeal (LBTH) Decided Permit
		PA/15/00002/S	Minor Material amendment through variation of conditions No 3 (Approved Parameters Plans), 4 (Phasing Plan), 5 (Total Floor Space Areas) and 6 (Phase-by-phase Floor Space Areas), of Outline Planning Permission granted 20th June 2012 (Ref: PA/11/02716) "For the mixed-use redevelopment of the existing Aberfeldy estate comprising: Demolition of 297 existing residential units and 1,990m^2 of non-residential floorspace, including shops (use class A1), professional services (use class A2), food and drink (use class A3 and	Permission granted under appeal (LBTH) Decided Permit

			A5), residential institution (use class C2), storage (use class B8), community, education and cultural (use class D1); and Creation of 1,176 residential units (Use Class C3) in 15 new blocks between 2 and 10 storeys in height plus up to 1,743m^2 retail space (Use Class A1), professional services (Use Class A2), food and drink (Use Classes A3 and A5) and 1,256m^2 community and cultural uses (Use Class D1), health centre (Use Class D1), together with a temporary marketing suite (407m^2), energy centre, new and improved public open space and public realm, semi-basement, ground and on-street vehicular and cycle parking and temporary works or structures and associated utilities/services." (Further information submitted in connection with Supplementary Environmental Statement)	
		PA/15/01826/P3	Submission of reserved matters pursuant to Condition 1 (details of siting, layout, scale, design and external appearance of the buildings, the means of access thereto and landscaping of the site), and partial approval of details pursuant to Condition 43 - (titled reserved matters further information) Sub-sections (a), (b) , (c), (d) (e), (f), (h) and (i) and partial discharge of Condition 25 (land contamination) Sub-Sections (a), (b), and (c) for the development of Phase 3 of the Aberfeldy New Village Outline Planning Permission (PA/15/00002) approved in June 2015 comprising demolition of Arapiles House, Athenia House, Jones House, Adams House, Sam March House, Theseus House and Trident House and creation of four residential blocks between 3 to 10 storeys, with a total of 344 new dwellings (21 x studio, 122 x 1 bed, 162 x 2 bed, 30 x 3 bed, 4 x 4 bed, 3 x 5 bed and 2 x 6 bed), a health centre facility, a pharmacy, a community/youth centre facility, retail spaces (618m^2) and energy centre, public open space, car parks, cycle parking and new public open space, car parks, cycle parking and temporary works or structures and associated utilities/services required by the development.	Permission granted under appeal (LBTH) Decided Permit
		PA/11/03375	Demolition of existing buildings and redevelopment of the site to provide a mixed use scheme of between 3 and 22 storeys comprising 8,104m^2 business accommodation (Use Class B1), 392 residential units (Use Class C3), associated parking and landscaping. This application is accompanied by an Environmental Impact Assessment	Permission granted under appeal (LBTH) Commenced
21	Poplar Business Park, 10 Prestons Road, London, E14 9RL	PA/11/03375	Demolition of existing buildings and redevelopment of the site to provide a mixed use scheme of between 3 and 22 storeys comprising 8,104 m^2 business accommodation (Use Class B1), 392 residential units (Use Class C3), associated parking and landscaping. This application is accompanied by an Environmental Impact Assessment	Permission granted under appeal (LBTH) Commenced
22	Land at Blackwall Yard, Blackwall Way, London, E14 2EH	PA/20/02509/A1	Phased redevelopment of the site and construction of 5 buildings (with maximum heights of between 9 and 39 storeys) comprising residential dwellings of mixed tenure, primary school & nursery, commercial, business & service floorspace, communal floorspace, public house, realignment of & environmental improvements to Blackwall Way, associated car & cycle parking, landscaping & public realm works (including alterations to the existing graving dock), installation of plant and associated works. External repairs and alterations to Grade II listed graving dock. This application is accompanied by an Environmental Statement.	Under determination
		PA/21/00288/A1	Full planning permission for a riverboat station, jetty and associated works at Blackwall Yard. This application is accompanied by an Environmental Statement.	Registered

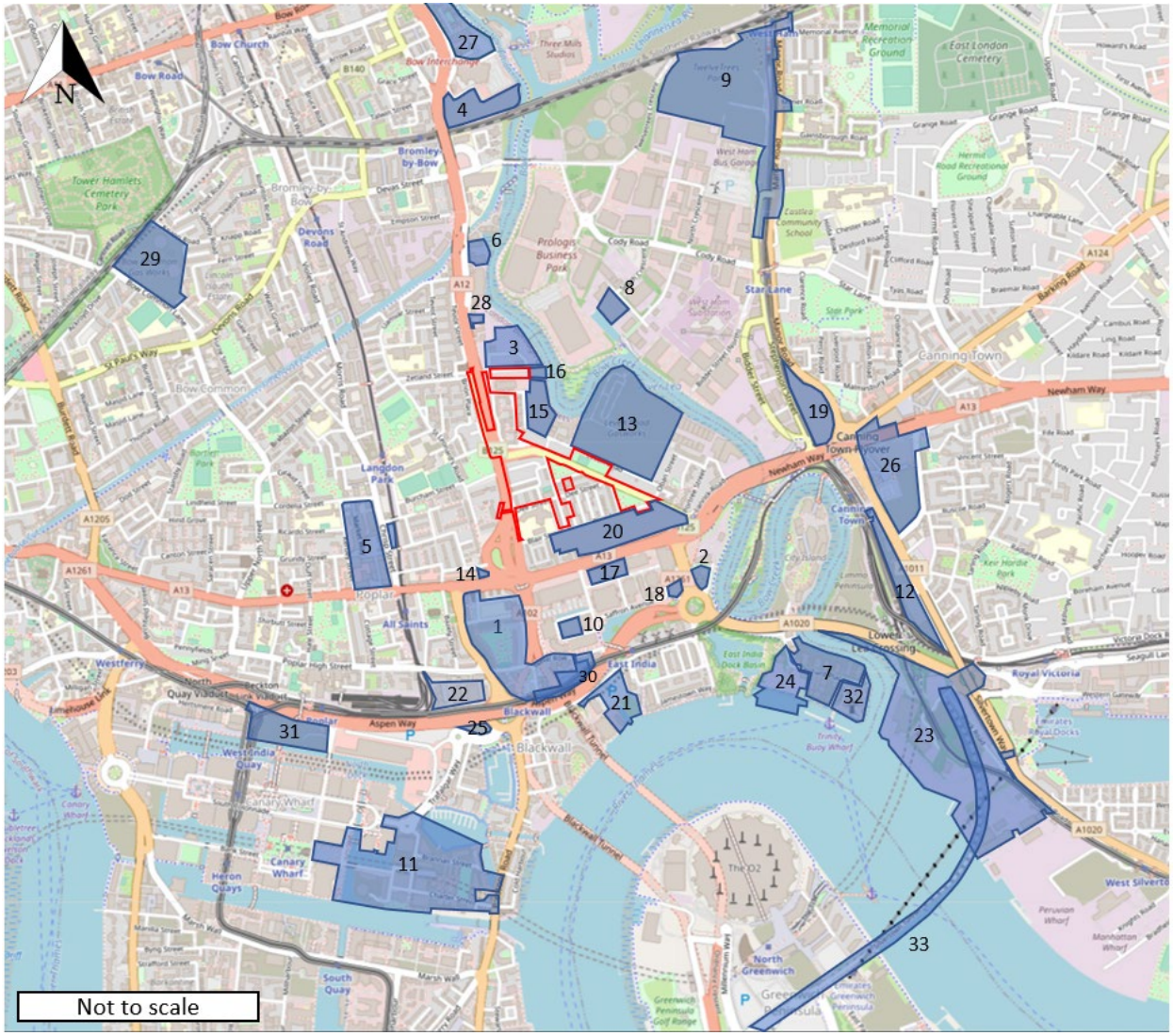
23	Land At Thameside West And Carlsberg Tetley Dock Road Silvertown London	PA/19/00292/NC	Phased Hybrid Planning Application Part A - Full planning application for redevelopment of site following demolition of all existing buildings and enabling works to provide a mixed-use development consisting of the erection of five buildings between 15 and 30 storeys (56.6 m AOD and 103.75 m AOD) above a raised safeguarded wharf box (15.5m AOD) and one standalone 20 storey building (68.9 m AOD) which would deliver: (i) a total of up to 826 dwellings (Class C3) and ancillary accommodation; (ii) up to 8,212m^2 gross internal area (GIA) of General Industrial / Storage or Distribution floorspace (Class B2/B8) including ancillary office accommodation; and (iii) 135m^2 (GIA) of flexible commercial floorspace (Class E). Associated works include hard and soft landscaping; private amenity space; vehicular access and servicing facilities; car parking and cycle parking; and other works incidental to the proposals including works to the River Wall; and Part B - Outline planning application for external waterborne freight infrastructure and all other related works (including marine works) for which all matters are reserved. This application is accompanied by an Environmental Statement.	Application under determination by LBTH Under determination
24	Orchard Wharf, Orchard Place, London	PA/20/02488/A1	Redevelopment of the site to provide a new mixed use building including student accommodation units and associated uses (Sui Generis), residential units (Class C3), office (Class B1), shops/cafes (Class A1/A3) and a restaurant/takeaway (Class A3/A5) arranged over a 4 storey podium with three taller elements of 46, 36 and 28 storeys (with roof-top plant and basements), alongside parking, landscaping, public realm and other associated works. This application is accompanied by an Environmental Statement.	Application under determination by LBTH Under determination
25	2 Trafalgar Way, London, E14 5SP	PA/20/01402/A2	Redevelopment of the site to provide a new mixed use building including student accommodation units and associated uses (Sui Generis), residential units (Class C3), office (Class B1), shops/cafes (Class A1/A3) and a restaurant/takeaway (Class A3/A5) arranged over a 4 storey podium with three taller elements of 46, 36 and 28 storeys (with roof-top plant and basements), alongside parking, landscaping, public realm and other associated works. This application is accompanied by an Environmental Statement.	Application under determination by LBTH Under determination
26	Areas 7 and IC Barking Road, Canning Town	11/00662/LTGDC	Outline planning permission (with all matters except for access reserved) for the comprehensive redevelopment of the land known as Areas 7 and 1C of the Canning Town and Custom House Masterplan to comprise a mixed use scheme including the demolition of existing buildings and associated structures, the alteration of the highways, engineering and construction of new buildings and structures to provide a total of 191,530m^2 (excluding basement) comprising retail use (Class A1/2/3/4/5), including a foodstore, residential dwellings (Class C3), leisure (Class D2) and health (Class D1), offices (Class B1a), live/work units (Sui Generis), research and development/light industry (Class B1b/c), a hotel (Class C1), student accommodation (Sui Generis), and energy centre, creation of basement and semi-basement car parking, landscaping, creation of new public realm and associated works with detailed planning permission for the development of Phase 1 (including Plot A) of Area 7 and 1C to comprise a foodstore (Class A1) of 8,200m^2 (GEA), a retail unit (Classes A1/2/3) of 425m^2 (GEA) and associated servicing areas, 179 residential dwellings (Class C30, and energy centre, a basement car park comprising 224 spaces and 238 temporary car parking spaces to be provided at grade adjacent to the foodstore, public realm works and associated works	Permission granted by LBN

27	Bromley by Bow North, Hancock Road, London	PA/11/02423/P1	Hybrid planning application for residential-led mixed-use redevelopment of the site comprising: Outline Application; All matters reserved (except for access) Demolition of all existing buildings; Development of 522 residential units (Use Class C3) (3 - 9 storeys, Blocks S1, S2, S3, S4, S5, S6, S7, S8, R5, R6, R7, and R9); 2,490.6 m² (GIA) Flexible Business Space (Use Class B1) (Ground and mezzanine levels in Blocks R5, S3 and S4); 6,299.2 m² (GIA) Car Dealership (Sui Generis) (4 - 8 storeys); 471 m² (GIA) Flexible Restaurant (Use Class A3) or Public House (Use Class A4) (2 storeys within Block S7) Associated highway infrastructure including creation of new access/egress arrangements along Hancock Road, access to Free Wharf; 133 residential car parking spaces (including 10 disabled car parking spaces); 16 commercial car parking spaces (including 3 disabled car parking spaces); together with 13 motorcycle spaces, 23 mobility scooter spaces, and 511 bicycle parking spaces; Public open space; and Landscaping and associated upgrade works to the River Lea towpath. Full details Demolition of all existing buildings; Development of 219 residential units (Use Class C3) (3 - 9 storeys, Blocks R1, R2, R3 and R4); 1,021 m² (GIA) Flexible Business Space (Use Class B1) (Ground and mezzanine levels in Block R4); Associated highway infrastructure including creation of new access/egress arrangement along Hancock Road, and temporary road for delivery and servicing to Block R4; 59 residential car parking spaces (including 4 disabled car parking spaces); together with 3 motorcycle, 3 mobility scooter spaces, and 291 bicycle parking spaces; Communal amenity space and temporary public open space; and Landscaping and associated upgrade works to the River Lea towpath.	Permission granted by LBTH Decided External Decision – Approved (GLA/CLG/L)
28	43 - 45 Gillender Street, London, E14 6RN	PA/19/01628/A1	Demolition of an existing container building, demolition of an existing extension to Bromley Hall (Grade II* Listed), erection of two blocks between 3 and 5 storeys to provide 22 residential units and 587m^2. office space (Use Class B1), minor alterations to Old Poplar Library (Grade II Listed) and Bromley Hall (Grade II* Listed).	Permission granted by LBTH Decided Permit
29	Bow Common Gas Works, Bow Common Lane, London	PA/19/02379	n Outline, with all matters reserved, for a comprehensive phased mixed-use development comprising demolition of existing buildings and structures, for the following uses: Residential (Class C3); Business uses including office and flexible workspace (Class B1); Retail, financial and professional services, food and drink uses (Class A1, A2, A3 & A4); Community, education and cultural uses (Class D1);	Resolution to grant planning permission Registered

			A sixth form centre (Class D1); Assembly and leisure uses (Class D2); Public open space including Bow Common and public realm; Storage, car and cycle parking; Formation of new pedestrian and vehicular access and means of access and circulation within the site together with new private and public open space and site preparation works; and Sustainable energy measures. In Full, for a comprehensive phased development comprising demolition of existing buildings and structures, and residential (Use Class C3) flexible residential facilities and commercial uses (Use Classes A1, A2, A3, A4, B1, C3, D1 and D2) together with public open space; public realm works and landscaping; car and cycle parking; servicing arrangements; sustainable energy measures; formation of new pedestrian and vehicular access and means of access and circulation within the site; and site preparation works. The application is accompanied by an Environmental Statement.	
30	Land Under The DLR Bounded By Scouler Street And Aspen Way And Prest30age Way, Aspen Way, London	PA/19/02292	342-room, part-24 part-17 storey, apart-hotel (C1 Use Class), eight workspace units (B1 Use Class), new bus loop/stand, new youth play area, and public realm works	Permission granted by LBTH Decided Permit
31	North Quay, Aspen Way, London, E14	PA/20/01421/A1	Application for outline planning permission (all matters reserved) for the redevelopment of the North Quay site for mixed use comprising: Demolition of existing buildings and structures; Erection of buildings and construction of basements; The following uses: - Business floorspace (B1) - Hotel/Serviced Apartments (C1) - Residential (C3) - Co-Living (C4/Sui Generis) - Student Housing (Sui Generis) - Retail (A1-A5) - Community and Leisure (D1 and D2) - Other Sui Generis Uses - Associated infrastructure, including a new deck over part of the existing dock; - Creation of streets, open spaces, hard and soft landscaping and public realm; - Creation of new vehicular accesses and associated works to Aspen Way, Upper Bank Street, Hertsmere Road and underneath Delta Junction;	Registered

			- Connections to the Aspen Way Footbridge and Crossrail Place (Canary Wharf Crossrail Station); - Car, motorcycle, bicycle parking spaces, servicing; - Utilities including energy centres and electricity substation(s); and - Other minor works incidental to the proposed development. This application is accompanied by an Environmental Statement. [For consultation purposes only: Proposal within 8 development zones for a maximum of 355,000m^2 of floorspace (GIA) in multiple buildings up to a maximum height of 225m AOD (above basement level) comprising: Business floorspace (B1) of between 150,000m^2 and 240,000m^2 (GIA) Residential (C3), up to a total maximum of 150,000m^2 (GIA) Co-Living (C4/Sui Generis), & Student Housing (Sui Generis) uses, up to a total maximum of 100,000m^2 (GIA) Hotel/Serviced Apartments (C1) up to 150,000m^2 (GIA) Retail (A1-A5) & Community and Leisure (D1 and D2) of between 10,000m^2 and 60,000m^2 (GIA) Other Sui Generis Uses up to 25,000m^2 (GIA) New streets, open space, public realm, landscaping, and other associated infrastructure]	
32	Trinity Buoy Wharf, 64 Orchard Place, London	PA/17/00729/A1	Outline planning application with all matters reserved for demolition of building(s), additional creative SME Use class B1 workspace; relocation and additional floor space for a School (Use Class D1) and additional floors pace to studios to the Royal Drawing School (Use Class D1).	Decided Permit
		PA/19/00957	Application for the approval of reserved matters in respect of Phase One Royal Drawing School (Building N) conditions no.1 (Reserved Matters) of planning permission ref: PA/17/00729; Dated 14/12/2018.	Decided Permit
33	The Silvertown Tunnel Order (2018).			

Figure C1 Cumulative Schemes Map



Appendix: Methodology

Annex 1: EIA Scoping Report
Annex 2: EIA Scoping Opinion
Annex 3: EIA Scoping Opinion Response
Annex 4: Cumulative Schemes List and Map
Annex 5: Cumulative Schemes Assessment Matrix

Scoping of 'Other Developments' in the Technical Assessment of Cumulative Effects

The following table presents a list of the cumulative schemes that have been considered for each of the technical assessments of the EIA. The table sets out how/if each scheme has been included within the assessment of cumulative effects for each of the technical assessments, denoted by a tick '✓' or a cross 'x'. Where a cumulative scheme has been excluded, a short explanation for this is provided.

Table / Map Ref	Development Name	Technical ES Chapter										
		Socio Economics	Traffic and Transport[1]	Air Quality[3, 4]	Noise and Vibration[3]	Climate Change[5]	Archaeology[5]	Water Resources, Drainage and Flood Risk	Daylight, Sunlight, Overshadowing[6, 7]	Wind Microclimate[7]	Built Heritage[8]	TVIA
1	Blackwall Reach The Robin Hood Gardens Estate together with land south of Poplar High Street and Naval Row, Woolmore School and land north of Woolmore Street bounded by Cotton Street, East India Dock Road and Bullivant Street	✓	x	x	x	✓	✓	✓	x	x	x	✓
2	Castle Wharf Esso Petrol Station, Leamouth Road, London, E14 0JG	✓	x	x	x	✓	✓	✓	x	x	x	✓
3	Ailsa Wharf, Ailsa Street, London	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4	Imperial 2 (formerly Clockhouse and Access House), Bromley by Bow, London, E3 3AE	✓	x	x	x	✓	✓	✓	x	x	x	✓
5	Chrisp Street Market, Chrisp Street, London	✓	x	x	x	✓	✓	✓	x	x	x	✓
6	Barrett Industrial Estate, 20-22 Gillender Street, London	✓	x	x	x	✓	✓	✓	x	x	x	✓
7	Hercules Wharf, Castle Wharf and Union Wharf, Orchard Place, London, E14	✓	x	x	x	✓	✓	✓	x	x	x	✓
8	Cody Dock 11c South Crest, Canning Town, London, E16 4TL	✓	x	x	x	✓	✓	✓	x	x	x	✓
9	Former Parcel Force Depot, Stephenson Street, Canning Town, London, E16 4SB	✓	✓	✓	✓	✓	✓	✓	x	✓	x	✓
10	Anchorage House, 2 Clove Crescent, London, E14 2BE	✓	x	x	x	✓	✓	✓	x	x	x	x This scheme does not result in any massing changes to the existing building and so the massing will remain as it appears in the photos.
11	Wood Wharf, Prestons Road	✓	x	x	x	✓	✓	✓	x	x	x	✓
12	Brunel Street Works, Canning Town Area 8 Bounded by Peto Street North and Victoria Dock Road Sivertown Way, Canning Town	✓	x	x	x	✓	✓	✓	x	x	x	✓
13	Leven Road Gasworks, Poplar Gas Works, Leven Road, London	✓	x	x	x	✓	✓	✓	x	x	x	✓
14	267-269 East India Dock Road, London, E14 0EG	✓	x	x	x	✓	✓	✓	x	x	x	✓

Table / Map Ref	Development Name			Technical ES Chapter								
		Socio Economics	Traffic and Transport[1]	Air Quality[3, 4]	Noise and Vibration[3]	Climate Change[5]	Archaeology[5]	Water Resources, Drainage and Flood Risk	Daylight, Sunlight, Overshadowing[6, 7]	Wind Microclimate[7]	Built Heritage[8]	TVIA
15	(Former Poplar Bus Depot), Leven Road, London, E14 0LN	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
16	Islay Wharf, Lochnagar Street	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
17	London Docklands Travelodge Hotel, Coriander Avenue, London, E14 2AA	✓	x	x	x	✓	✓	✓	x	x	x	✓
18	Site north west of Leamouth Road Roundabout, Leamouth Road, London	✓	x	x	x	✓	✓	✓	x	x	x	✓
19	300 Manor Road, Land Comprising Former HSS Site And 300 Manor Road Canning Town London	✓	x	x	x	✓	✓	✓	x	x	x	✓
20	Aberfeldy Estate, Abbott Road, London, E14[2]	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
21	Poplar Business Park, 10 Prestons Road, London, E14 9RL	✓	x	x	x	✓	✓	✓	x	x	x	✓
22	Land at Blackwall Yard, Blackwall Way, London, E14 2EH	✓	x	x	x	✓	✓	✓	x	x	x	✓
23	Land At Thameside West And Carlsberg Tetley Dock Road Silvertown London	✓	x	x	x	✓	✓	✓	x	x	x	✓
24	Orchard Wharf, Orchard Place, London	✓	x	x	x	✓	✓	✓	x	x	x	✓
25	2 Trafalgar Way, London, E14 5SP	✓	x	x	x	✓	✓	✓	x	x	x	✓
26	Areas 7 and IC Barking Road, Canning Town	✓	x	x	x	✓	✓	✓	x	x	x	✓
27	Bromley by Bow North, Hancock Road, London	✓	x	x	x	✓	✓	✓	x	x	x	✓
28	43 - 45 Gillender Street, London, E14 6RN	✓	x	x	x	✓	✓	✓	x	x	x	✓
29	Bow Common Gas Works, Bow Common Lane, London	✓	x	x	x	✓	✓	✓	x	x	x	✓
30	Land Under The DLR Bounded By Scouler Street And Aspen Way And Prestage Way, Aspen Way, London	✓	x	x	x	✓	✓	✓	x	x	x	✓
31	North Quay, Aspen Way, London, E14	✓	x	x	x	✓	✓	✓	x	x	x	✓
32	Trinity Buoy Wharf, 64 Orchard Place, London	✓	x	x	x	✓	✓	✓	x	x	x	✓
33	The Silvertown Tunnel Order (2018).	✓	x	x	x	✓	✓	✓	x	x	x	x

Notes: 1. The cumulative schemes included within the traffic and transport assessment were agreed separately with TfL and LBTH through the Transport Assessment scoping process.
2. This scheme is built out/near completion and therefore is considered within the baseline assessments.

3. The operational assessment is based on the assumptions for the traffic data as set out in point 1 above. Consideration has also been given to the potential for cumulative effects during the demolition and construction phase with these same cumulative schemes as they are closest to the Site.
4. Receptors from cumulative schemes have not been included in the air quality as there are sufficient existing receptors along roads affected by the Proposed Development already included in the assessment to be able to determine the likely effects at these introduced receptors (negligible).
5. Qualitative consideration only.
6. Aberfeldy Village Masterplan and Ailsa Wharf are under construction and included in the baseline condition as fully built out.
7. All other cumulative schemes are located too far from the Site to be affected and therefore have not been included within the assessment.
8. It is not expected that there will be a cumulative effect from the other cumulative schemes due to their distance from the heritage receptors scoped into the Built Heritage assessment and the intervening townscape (ES Volume 2).

Appendix: Demolition and Construction

Annex 1: Outline Construction Environmental Management Plan (CEMP)

Appendix: Demolition and Construction

Annex 1: Outline Construction Environmental Management Plan (CEMP)

CONTENTS

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1.0 INTRODUCTION

This outline Construction Environmental Management Plan (CEMP) has been prepared by Blue Sky Building and is submitted in support of a hybrid planning application for the Aberfeldy Village Masterplan. The hybrid planning application is made in relation to the north of East India Dock Road (A13), east of the Blackwall Tunnel Northern Approach Road (A12) and to the southwest of Abbot Road (the “Site”) on behalf of The Aberfeldy New Village LLP’ (“The Applicant”). The hybrid planning application is formed of detailed development proposals in respect of Phase A for which no matters are reserved ("Detailed Proposals"), and outline development proposals for the remainder of the Site, with all matters reserved ("Outline Proposals"). The Detailed Proposals and Outline Proposals together are referred to as the “Proposed Development”.

The Proposed Development comprises the comprehensive redevelopment of the Site. The Proposed Development will provide new retail and workspace floorspace along with residential dwellings and the pedestrianisation of the A12 Abbott Road vehicular underpass to create a new east to west route. The Development will also provide significant, high quality public realm, including a new Town Square, a new High Street and a public park.

The purpose of the CEMP is to outline how the Aberfeldy Village Masterplan construction project will avoid, minimise or mitigate effects on the environment and surrounding area.

It is anticipated that the Final CEMP will be considered a ‘living’ document. As such, the document will be subject to regular reviews and updates to reflect the actual activities associated with the construction works, particularly where they change throughout the works. This will be prepared by the appointed Contractors.

Framework of this Outline CEMP

This Outline CEMP aims to provide an overarching and strategic framework for the management of environmental effects and the implementation of measures prior to, and during, the construction phase of the Proposed Development. It is based on the London Borough of Tower Hamlets (LBTH) Code of Construction Practice and established good management principles. It includes the following information:

- Information pertaining to data management, roles and responsibilities, structure, mitigation and monitoring, auditing, and non-compliance and corrective actions;
- Information pertaining to staff training, health and safety, community liaison;
- Information relating to the Site and the Proposed Development;
- Outline of the construction works, timing and duration;
- Environmental management measures, for the following elements:
  - Transport;
  - Noise and Vibration;
  - Air Quality;
  - Waste;
  - Ground Conditions;
  - Ecology;
  - Surface Water Management; and
  - Schedule of Environmental Legislation.

2.0 THE FINAL CEMP

Principal Contractor Requirements

The Contractor will identify in the Final CEMP how compliance with the requirements of LBTH Code of Construction Practice (CoCP) will be achieved.

There is a large body of environmental and safety requirements relevant to construction projects, in the form of primary legislation (Acts of Parliament), secondary legislation (Statutory Instruments, including Regulations and Orders), statutory guidance and Codes of Practice. The Contractors will be responsible for identifying new legislation and regulation and complying with all prevailing legislation at the time of construction including any requirements under Health and Safety regulations.

In addition to the environmental requirements described, the Contractors will be responsible for obtaining licences from LBTH before erecting any scaffolding, hoardings, gantries, temporary crossings or fences or depositing a skip on the highway.

A suitably qualified environmental professional will be appointed by the Principal Contractor to prepare the Final CEMP.

Document Control

The Final CEMP will be held and maintained electronically, with the latest revisions identified with a document reference.

Site Management – Roles and Responsibilities

An outline of the anticipated key roles and responsibilities are listed overleaf in Table 1.

Mitigation and Management Measures

The mitigation and management measures outlined in the following sections are to be included within the Principal Contractor's CEMP unless measures which have a greater level of environmental protection are proposed.

Table 1 Summary of Anticipated Key Roles and Responsibilities relating to the Implementation of the CEMP

Role	Key Responsibilities
The Aberfeldy New Village LLP. (Client)	Responsibility for appointment / allocation of the Principal Contractor, Project Manager and Environmental Manager,
TBA (Principal Contractor)	Responsibility for the enabling and construction activities and holds overall responsibility for the activities on site and implementation of the Final CEMP. Responsibilities include: ▪ Ensuring that the works are carried out in accordance with the Final CEMP and contract documentation, including the implementation of mitigation and management measures, environmental monitoring, environmental auditing, and other matters covered in this Outline CEMP; ▪ Ensuring the appointed contractors / subcontractors are appropriately qualified and competent; ▪ Ensure environmental awareness training for all workers, including an induction for all site workers / contractors which includes environmental elements pertaining to the implementation of the Final CEMP; ▪ Monitor the performance of contractors / sub-contractors and provide direction as necessary; ▪ Liaise regularly with the Environmental Manager; ▪ Complete a monthly audit of the Final CEMP and report findings, with follow up on identified actions as required; and ▪ Undertaking corrective actions in the event of breaches of the CEMP or applicable environmental legislation. ▪ Ensuring that resources are appropriately allocated to allow for the inclusion of the actions included in the Final CEMP for the duration of the project. ▪ Responsible for the actions of management of contractors / sub-contractors associated with the construction works and ensuring that they appropriately comply with the requirements of the Final CEMP and applicable environmental legislation.
Environmental Manager	Co-ordinate monitoring and reporting of the Final CEMP implementation, through liaison with the Principal Contractor and other parties as appropriate, to ensure that the works are implemented in accord with the commitments in the Final CEMP. Responsibilities include: ▪ Undertake environmental monitoring and reporting as specified in the Final CEMP; ▪ Undertaking environmental audits in conjunction with the Principal Contractor as specified in the Final CEMP. Reporting of audit findings is to occur on a monthly basis. ▪ Regularly review the Final CEMP to ensure it accurately reflects the construction works occurring on site, at a frequency of no less than six months (unless significant changes to the enabling and construction methodology occurs); ▪ Ensure that all relevant environmental consents, licences, permits etc. are in place prior to the commencement of the relevant works. Ensure the requirements of these permits are included in the Final CEMP and are adhered to; ▪ Act as the first point of contact for environmental issues associated with the Proposed Development; ▪ Undertake environmental training (including toolbox talks) as required, to ensure that enabling and construction staff are aware of the environmental requirements; ▪ Ensure that the objectives of the Final CEMP are being achieved and that

	are not contrary to any relevant legal requirements; ▪ Engage with the Principal Contractor on environmental issues identified during the construction works, and issue Corrective Notices where required. Follow-up on such notices is to be undertaken in conjunction with the Principal Contractor to ensure non-compliances have been appropriately rectified.
Environmental Consultant	Advise Client on environmental related matters as requested.
Contractor(s) / Sub-Contractor(s)	▪ Work to agreed plans, methods and procedures to minimise environmental impacts; ▪ Commit to undertaking works associated with the Project in accordance with the Final CEMP; ▪ Undertake the site induction training (which is to include an environmental management element); ▪ Report all environmental incidents immediately to their line manager; and ▪ Monitor the workplace for potential environmental risks and alert their line manager if any are observed.

Key Contacts

The following Table outlines the Key Contacts for Aberfeldy Village Development.

Table 2 Key Project Contacts

Role	Name	Contact Details
The Aberfeldy New Village LLP (Client)	TBC	TBC
(Principal Contractor)	TBC	TBC
Structural Engineer	TBC	TBC
Environmental Consultant	TBC	TBC
Project Manager	TBC	TBC
Site Manager	TBC	TBC
Environmental Manager	TBC	TBC
Health and Safety Officer	TBC	TBC
Community Liaison Manager	TBC	TBC

3.0 GENERAL FRAMEWORK AND ADMINISTRATION

Public Liaison

The Contractor should provide LBTH Environmental Health Department with a full programme of key activities for the development before it starts.

The specific measures to be implemented by the Contractor will include:

- The Contractor will liaise with LBTH Environmental Health Department on a regular basis, agreeing routine arrangements for each site's activities and ensuring compliance with the Final CEMP.
- The Contractor will be responsible for establishing and maintaining contact with LBTH and local residents; keeping them informed of construction matters likely to affect them.
- This liaison will include the regular and frequent distribution of Newsletters and attendance at meetings at the request of LBTH with representatives of local businesses and residents' groups. (See under community relations below).
- The Contractor will provide an information and reporting telephone 'Hot Line' staffed throughout working hours. Information on this facility shall be prominently displayed on site hoardings. The Contractors' nominated persons will attend monthly reviews with LBTH Environmental Health Department, or otherwise as requested.
- The Contractor will facilitate LBTH Environmental Inspectors to undertake regular planned inspections of the site to check compliance and associated records.
- The Contractor will provide LBTH with a full programme, providing detail on the nature and timing of the main site activates. The contents of this programme are specified in the following section.

Community Liaison

Contact with neighbours and the public throughout the construction programme will be pro-actively maintained, with regular update meetings on no less than a quarterly basis and the issuing of a brief news sheet on progress. Update sheets will be displayed on site hoardings.

The Contractors will nominate community relations personnel, who will be focussed on engaging with the local community. The Contractor will ensure that occupiers of nearby properties and residents are informed in advance of works taking place,

including the estimated duration. The Contractor will inform local businesses and residents likely to be affected by such activities at least 14 days prior to undertaking the works, as well as applying for the appropriate permits and licences, (e.g. hoardings and crossovers).

Neighbour and Public Relations Strategy
To successfully develop and implement a 'Neighbour and Public Relations Strategy', the following actions will be undertaken:

- Initial Contact: Once full planning permission has been obtained and contractors have been appointed, formal contact will be established with the nearest neighbours and those who could potentially be affected by the construction works; and

- Contact during Works Period: A single point of contact for neighbour and public relations will be established, with a senior member of the project staff nominated for the role. Contact details for this single point of contact will be displayed on the site hoarding. Outside normal working hours, site security will act as the main point of contact via a dedicated phone number. Security will alert the staff contact if necessary (available 24 hours). Should there be any complaints, these will be logged, fully investigated and reported to the relevant department within LBTH as soon as possible. The complainant will be informed as to what action has been taken.

Emergency Incident Communication

In the case of work required in response to an emergency, LBTH and all neighbours will be advised as soon as reasonably practicable that emergency work is taking place. Potentially affected occupiers will also be notified of the 'hotline' number, which will operate during working hours.

Construction Staff and Training

All site construction staff to be made aware of the requirements of the CEMP and will be made responsible for its implementation. Regular training is to be implemented where deemed appropriate, and in response to non-compliance incidents.

Health and Safety

The Principal Contractor will prepare and implement a project specific Construction Phase Plan, in accordance with The Construction (Design and Management) Regulations (CDM Regulations). This Plan is to be provided to, and agreed with, LBTH (and other relevant parties as required).

4.0 PROJECT OUTLINE

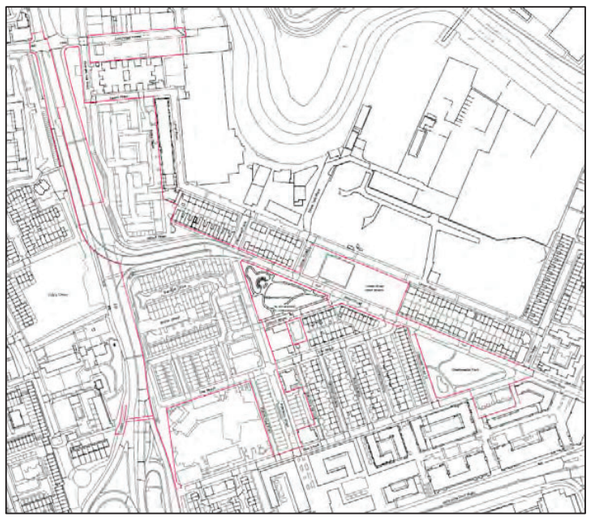
The Site

The Proposed Development is located on Land to the north of East India Dock Road (A13), east of the Blackwall Tunnel Northern Approach Road (A12) and to the southwest of Abbot Road.

The Site is located in Poplar, within the administrative boundary of the London Borough of Tower Hamlets. The Site is 8.14 hectares (approx. 20 acres) in total and comprises:

- Abbott Road;
- Aberfeldy Street;
- Balmore Close;
- Blairgowrie Court;
- Heather House;
- Jura House;
- Tartan House;
- Thistle House;
- Kilbrennan House;
- Nos. 33-35 Findhorn Street;
- 2a Ettrick Street;
- 384 Abbott Road;
- Lochnagar Street;
- Aberfeldy Neighbourhood Centre;
- Nairn Street Estate; and
- Leven Road Open Space and Braithwaite Park are included for their enhancement.

Location Plan



Overview of the Proposed Development

The Aberfeldy Village Masterplan aims to deliver, up to 1628 new homes, new workspace, a new high street, new and improved open space and the pedestrianisation of the A12 Abbott Road vehicular underpass.

The anticipated works comprise residential development and associated demolition and public realm improvements to be delivered in four phases. The works are summarised as:

Phase A – Buildings H1 to H3, I and J (the Detailed Proposals);
Phase B – Buildings A1 to A3, B1 to B5, and extensive highways and public realm alterations;
Phase C – Buildings C1 to C4 and E1 to E3;
Phase D – Buildings D1 to D4; and

Public realm works to be delivered in each phase.

Construction Sequence

The Proposed Development is expected to be completed in four construction phases, sequenced to suit a phased completion and occupation. The proposed development is currently planned to be completed and occupied in the sequence: Phase A-B-C-D.

Public realm and highways works will be completed within each phase to suit the occupation sequence with the larger elements of highways alterations planned with Phase B.

Project Programme

The current expectation is that the demolition and construction works would take approximately 128 months (10 years 8 months). Phases may be constructed in an overlapping sequence. The Contractor is to provide the Environmental Health Department with a full programme. This will include:

- detailed method statement for works and activities affecting the highway
- detailed method statements for specific/special activities in line with the principles identified in this report
- details of site traffic movements showing the projected number of vehicles; what is being delivered, when peaks in activities occur, traffic marshalling arrangements.
- routes to site for deliveries.
- The Contractor will agree detailed schedules of work with the Inspectors acting on behalf of LBTH prior to commencement of development to assess the potential for nuisance.

Indicative Construction Timetable

Construction Task / Activity	Duration	Start Date (Quarter and Year)	Completion Date (Quarter and Year)
Phase A Site Establishment & Demolition	5 months	Year 1 Q3	Year 2 Q1
Phase A Construction.	28 months	Year 1 Q3	Year 3 Q4
Phase B Demolition	5 months	Year 3 Q3	Year 3 Q4
Phase B Construction	36 months	Year 4 Q1	Year 6 Q4
Highways: A12/ B125 Junction	15 months	Year 3 Q4	Year 4 Q4
Highways: B125 realignment	12 months	Year 5 Q1	Year 5 Q4
Public Realm: Underpass Pedestrianisation and landscape	12 months	Year 6 Q1	Year 6 Q4
Phase C/ D Demolition	7 months	Year 6 Q3	Year 6 Q4
Phase C Construction	36 months	Year 7 Q1	Year 9 Q4
Phase D Construction	22 months	Year 10 Q3	Year 12 Q2

5.0

CONSTRUCTION OVERVIEW

This section of the document will identify the expected construction methodology of the project. Much of the design is at an early stage and more detailed construction planning will be carried out as the individual building designs become more advanced

The construction of the Proposed Development will comprise the following key stages, overlapping across the phased construction sequence.:

1. Site establishment;
2. Demolition and site Preparation;
3. Substructures/ Foundations;
4. Superstructures;
5. Building Envelope;
6. Fitting Out; and
7. Landscaping (sequenced to suit the completion of each phase).

Pre-construction Planning

Prior to commencement of works on site a period of pre-construction planning and activities are required to ensure works can commence.

- Production of a detailed CEMP including:
- Neighbour liaison before the commencement on site to explain the nature of works.
- Liaison with the project teams of potentially ongoing local developments to agree shared and combined logistics issues.
- Condition survey of boundary walls and fences.
- Condition survey of highways.
- Existing statutory services surveys.
- Ecological surveys to facilitate site clearance.
- Unexploded ordnance checks.
- Formulation of project Construction Phase Plan and risk assessments.
- Formulation of detailed Site Waste Management Plans and environmental plans as per the current DEFRA guidelines.
- Development of project specific method statements.
- Production of detailed works programmes and sequencing.
- Hoarding and scaffold licences for works on the perimeter boundary.
- Section 80 demolition notices.
- Construction notices.
- Notices for works on the highway in accordance with the Highways Act 1980 and Road Traffic Act 1998.

- Connections to existing statutory services and main sewers.
- Licence for discharge of water from the site into the public sewer
- baseline movement & environmental monitoring establishment
- Submission of section 61 Prior Consent application
- Register the project under the Considerate Constructors Scheme.
- Mobilisation of selected plant and operators

Site Establishment

One of the first site activities as each phase starts will be to establish the area as a construction site. The working areas will be secure, and the general public will be separated from the works. The construction site areas will be secured prior to works commencing with solid and well maintained, 2.4m high hoarding. Secure access points with wheel cleaning facilities will be established at the access and egress locations. Pedestrian access points for operatives and staff will generally be located close to the main vehicular access gates with separate pedestrian gates and footpaths provided.

The project offices are proposed to be established in Jura House (subject to planning permission), a residential building within the phase D site. Welfare and individual site offices will be located in temporary modular buildings on each phase. Temporary accommodation and welfare facilities will be adapted as required as demolition and construction processes.

Specific Site Establishment activities will include:

- Hoardings will be 2.4m high, decorated, with clear pedestrian warning signs and the required notices of Contractors Contact details. Bulkhead lighting to be provided in accordance with LBTH licence.
- Vehicle and pedestrian access to the works will be via separate entrances controlled by fully trained gatemen and traffic marshals.
- Installation of site temporary electrics, lighting, water and fire alarms. The site will operate from connections to the permanent utility supplies rather than generators.
- Establishment of site security provisions to ensure that the site is protected against unauthorised or unlawful entry and potential theft from site.
- Wheel cleaning facilities will be established at all site access and egress locations.
- Establish project offices in temporary cabins located inside the construction boundary hoardings.

Site Establishment

Construction site areas will be made safe and secure prior to works commencing and the general public will be separated from the works, with the use of solid and well maintained, 2.4m high hoardings. Secure access points with wheel cleaning facilities will be established at all site access and egress locations. Pedestrian access points for operatives will generally be located close to the main vehicular access gates with separate pedestrian gates and footpaths provided. Public access to neighbouring buildings will be safeguarded and will be entirely separate from construction areas.

In addition to the proposed use of Jura House subject to planning permission as the main Project Office, site offices and associated welfare facilities for the workforce will be provided for each site. Temporary accommodation and welfare facilities will be established in temporary cabins as works progress. The locations will be identified in advance and agreed with the LBTH as part of the detailed construction and demolition logistics programming and approval of the DMS, CMS and CEMP. It is anticipated that further information and details on this will be submitted, pursuant to planning conditions in relation to construction and demolition management.

Perimeter scaffolding with Monarflex sheeting will be designed to ensure that safe access for both pedestrians and vehicles accessing the retained neighbouring buildings and surrounding streets.

Demolition

Two methods of demolition will be adopted and will be refined following further risk assessment of the individual sites and surrounding areas. Taller buildings that lie alongside congested areas and public highways will be demolished using a “Top Down” method. ‘Top-Down’ demolition offers more control and accuracy over standard mechanical demolition methods. The Blair Street site where Building I is proposed in Phase one is an example where “Top Down” would be appropriate. The majority of buildings, where a safe buffer zone exists within the site boundary, will be demolished by “High Reach” machines. This dual approach to demolition will ensure that high reach plant operated at a considerable distance from the public and is contained within the central areas of the site. Further details of the methods to be applied follow below.

The first demolition areas will focus on both the Phase A construction areas The site for the terrace “J” has been previously demolished and once secured will be investigated and cleared of vegetation and below ground obstructions. Sites of buildings F, H and I will be secured, hoarded and prepared for demolition by top down or high reach methods.

A “Soft Strip” will entail the removal of all internal furnishings, windows and roof plant, and will include the safe removal of asbestos within the existing buildings by a specialist contractor. Advanced building surveys will be carried out as part of the pre-demolition process following vacant possession of each building, including a full Refurbishment & Demolition (R&D) survey of materials containing asbestos. Waste arising from the soft strip will be separated on site into recyclable waste streams for processing off site.

Top-Down demolition is undertaken by encapsulating the building with scaffolding and Monarflex, back propping the floors where required (subject to engineer’s report) and lifting smaller machines into the building by crane. The building is then reduced a floor at a time. The arisings from the demolition shall either be loaded down stripped out lift shafts or lifted down in bins using a crane.

For High Reach demolition of the central areas of the site, buildings are demolished in a step like manner working through the structural bays on each floor using excavators fitted with long reach arms. Arisings on the floors will be scraped off periodically to keep the weight on the slabs to a minimum. Independent scaffolding and Monarflex will be used on key elevations and water hoses fed up through the machine arm assists dust suppression. Arisings on the ground will be processed for crushing using standard height machines.

The buildings will primarily be dismantled using a combination of machine mounted pulverisers, crushers and shears. Water dousing will be carried out using recycled water where possible, to control dust. Noise levels will be controlled using best practice controls and management including the provision of screening where required. It is anticipated that the concrete materials recovered from the demolition process will be crushed, graded and stockpiled on site, and then ultimately reused on site. In the event of contaminated material being identified, the contaminated material will be segregated and removed from site to a suitable landfill.

Various utilities and services exist on the site. To eliminate the risks associated with live services, existing services will be identified and terminated prior to demolition commencing. Temporary services will be installed in advance of these terminations as necessary. All new cables and services will be clearly marked, located and identified.

Substructure/ Foundations

All of the proposed buildings are founded at ground level with the exception of Building B3 in Phase B which has a single level basement.

New piled foundations will be required to support the new construction. Design is at an early stage and remains subject to further site investigations, but current expectation is that piles for Phase A Buildings will be Continuous Flight Auger (CFA), 600mm diameter and up to 20m deep.

When demolition is complete to each site a piling platform will be constructed using compacted crushed demolition arisings that will have been stockpiled for this purpose. Pile probing for below ground obstructions will be undertaken prior to forming the piling platform.

Piling will be undertaken from a piling platform at the existing ground level. Excavation for below ground drainage, ground beams and pile caps will follow piling operations. Basement (B3 only) and ground level slabs will then be cast.

A single piling rig is likely to be on site for each of the buildings in Phase A, although multiple rigs may operate on the larger phases in the future. Piling will be serviced by small crawler cranes and 360º excavators. Concrete will be delivered by ready mix trucks and placed directly from the vehicle's placement chute where possible.

Fixed tower cranes, needed for building each superstructure, will be erected during the piling works and will be used to service the remaining substructure construction. Cranes will generally be positioned within the footprint of each of the taller buildings. Low rise structure will be constructed using smaller mobile cranes.

Superstructure

The proposed superstructures to the residential buildings will be reinforced concrete framed with ribbon columns and flat slab floors. The concrete cores may be constructed ahead of the main frame by slip-forming or jump-forming. Consideration will be given in the detailed construction planning to utilising prefabricated elements, such as columns and staircases. Balconies will need to be carefully considered as the final detailing can dictate method and sequencing of the superstructure frames. It is envisaged that the final balconies design will allow a 'clip-on' approach, fixed to the external cladding.

Fixed tower cranes will be used to assist with construction of the superstructures in a conventional manner on a floor-by-floor basis. Concrete will be placed by concrete pumps and placing booms.

Access and edge protection will be incorporated in the design of the falsework system which could include climbing screens to contain construction operations for the taller buildings.

The lifting equipment (e.g. mobile cranes, tower cranes, other lifting equipment such as elevated working platforms or forklifts etc) that will be required throughout the construction works is yet to be determined in detail. However, as part of the DMS and CMS, a lifting strategy will be developed and prepared in accordance with the detailed design and statutory obligations. The LBTH will be consulted throughout preparation of the lifting strategy to ensure an appropriate proposal is put forward for consent. All necessary permits and licenses (e.g. permits and over sailing licenses (where applicable) for tower cranes) will be secured, and risk assessments and safe working instructions prepared and approved, ready for implementation by the contractor prior to the use of this type of equipment on site.

Building Envelope

The new cladding will be a mixture of components for which specific methodologies will be developed once the design has been further developed. For the purposes of construction planning for we have assumed that the inner skin of the perimeter walls to residential blocks would ideally be a Metsec, or similar SFS (steel framing system) which will allow earliest creation of a watertight environment for fit out works to commence.

For the low-rise buildings traditional scaffolding would be erected as concrete frames near completion for the construction of SFS, windows and membranes; followed by hand laid brickwork, or rendered rainscreen panels. For the taller buildings mast climber platforms may be used for access rather than scaffolding.

Materials will be transported vertically by platform hoists. Mortar would be delivered as dry ready mix and stored on site in silos for daily preparation and use.

The final operations for tower cranes will be to deliver roof materials, plant and equipment, after which they will be dismantled and removed. External hoists will remain in position throughout the envelope construction and to move fit out materials. Hoists will remain in position until permanent lifts are operational.

Fitting Out

Finishes and services fit out will commence once a level of temporary or permanent water tightness has been achieved, working from the lower floors upwards. The fit-out works will comprise the complete installation of finishes and services to the residential units, common areas and cores.

Plant will be installed when plant rooms become available, and services distribution will then proceed. Prefabrication of

components will be adopted wherever practical in order to reduce site time and numbers of deliveries.

As each building nears completion the construction site area will be reduced, and the local hard and soft landscaping areas released. Finally, the temporary site facilities and hoardings will be cleared, and the final landscaping completed for the public realm.

Highways

The proposed project includes the realignment of the junction of the B125 (Abbott Road) and A12 including the pedestrianisation and landscaping of the current northbound underpass. The Highways alterations will mostly be undertaken in Phase B. The junction and underpass will remain open throughout the demolition and construction to help mitigate the additional traffic flows. Early construction of the new junction (in year 4) will provide a direct construction access to Phase B from the A12.

The new alignment of Abbott Road will be constructed through the Phase B site in parallel to construction of the buildings in year 5 and the underpass would be closed around the end of that year. The pedestrianisation and landscaping of the underpass would then be concluded in year 6, the final year of Phase B works.

6.0 THE CONSTRUCTION SITE

This section outlines the requirements relating to site management practices, ranging from the location of accommodation and equipment to the operation of equipment on site. It outlines procedures that should be implemented during site operations. These relate to working hours, site layout & appearance, and good housekeeping.

Representatives from the Contractors and LBTH should regularly inspect the construction site to ensure that these procedures are followed. The Contractors must follow a ‘good housekeeping’ policy at all times.

The specific measures to be implemented by the Contractors will include:

Working hours

Working Hours will be in accordance with LBTH’s CoCP:

08.00 to 18.00 Monday to Friday
08.00 to 13.00 Saturday
No working on Sundays, Bank or Public Holidays

To ensure that the impact of the enabling and construction is kept to a minimum we propose that the contractors should submit a Section 61 Prior notice application to LBTH.

Good housekeeping

The Contractors will:

- ensure considerate site behaviour of the Contractors’ staff;
- ensure the noise from lorry reversing alarms and the like are kept to minimum levels;
- prohibit open fires;
- ensure that appropriate provisions for dust control and road cleanliness are implemented;
- remove rubbish at frequent intervals, leaving the site clean and tidy;
- frequently inspect, repair and re-paint as necessary all site hoardings to comply with the conditions of LBTH Licence – all flyposting and graffiti is to be removed as soon as reasonably practicable and within 24 hours of notice from authorities;
- maintain toilet facilities and other welfare facilities for its staff;
- remove food waste;

- prevent vermin and other infestations; and
- undertake all loading and unloading of vehicles inside the site boundary.

Public information

The site hoarding will display all necessary health & safety material.

Security

The Contractors will ensure that the site is secure and will prevent unauthorised entry to or exit from the site. Site gates will be closed and locked when there is no site presence. Alarms will incorporate an appropriate cut-out period. Access and egress will be via controlled security gates.

Hoardings, site layout and facilities

The site will be completely secure to deter public access. The proposed hoarding line and gates, all of which will be in accordance with LBTH licencing requirements, are shown on the logistics plans in section 7. It is intended to provide protection from noise and dust at all times through the erection of encapsulating scaffolds, climbing screens and physical barriers as appropriate to the task.

Site welfare arrangements will be maintained in temporary accommodation in modular cabins.

Emergency planning and response

The Contractors will develop a plan for emergencies to incorporate:

- Emergency procedures including emergency pollution control to enable a quick response.
- Emergency phone numbers and the method of notifying LBTH and statutory authorities. Contact numbers for the key staff of the Contractors will also be included. The Contractors will display a ‘contact board’ on the hoarding identifying key personnel with contact addresses and telephone numbers, so that members of the public know who to contact in the event of a report or query.
- London Fire Commissioner requirements for the provision of site access points.
- Site Fire plan and management controls to prevent fires.
- A plan to reduce fire risk and potential fire load during construction, operation and subsequently during maintenance or repair. The project will comply with any third-party requirements as may be appropriate.

Access and Egress Gates

The main site access gates will be located as indicated on the logistics plans in section 7.

Materials Handling & Cranes

Materials handling is a major logistics exercise for large projects. Prefabrication will be adopted extensively with components being brought to site in large sections where possible. Large volumes of materials will be required at times calling for the highest levels of delivery and handling management. Delivery vehicles will enter the sites as shown on the site logistics drawing and leave in forward gear.

LBTH approvals will be sought for tower crane locations. Luffing jib cranes will be used such that oversailing of neighbouring property can be ruled out by computer limiter. Cranes will be positioned ensuring that out of service radii do not extend beyond the site boundary.

Considerate Constructors Scheme

The site will be registered with the ‘Considerate Constructors Scheme’. This scheme ensures that contractors carry out their operations in a safe and considerate manner with due regard to neighbours, passing pedestrians and road users.

7.0 SITE LOGISTICS

The efficient management of the site logistics will be vital to the success of the project. A key strategy of logistics for a construction project is to ensure that the products and materials arrive on site at the time and in the quantities that are required.

The Contractor will ensure that the necessary pre-planning is undertaken and that the quality of the communication between those planning the project and those supplying the products and materials is maintained throughout the duration of the project.

The drawings overleaf illustrate the proposed overall logistics plan for the sites that incorporates the following key features:

- Sites are fully hoarded throughout the construction periods;
- Safe segregated access to adjacent properties maintained;
- All vehicle access via gates as indicated;
- All loading and unloading to be within the site boundary;
- Access and egress to be controlled by fully manned security gates;
- Tower cranes to be selected and located to ensure no oversailing outside the site boundaries.

Please refer to Phasing and Logistics drawings BSB-AV-001-010 overleaf

Lochnagar Street

J

Bromley Hall Road

A 12

Leven Road

Compound/
Landscaping

Self Erecting
Crane
(Indicative)

KEY

- Harding/ Gates
- Traditional Scaffold
- Crane
- Site Accommodation
- Traffic Marshal
- Wheel wash
- Vehicle Access
- Vehicle Egress

BLUE SKY BUILDING
founded on excellence

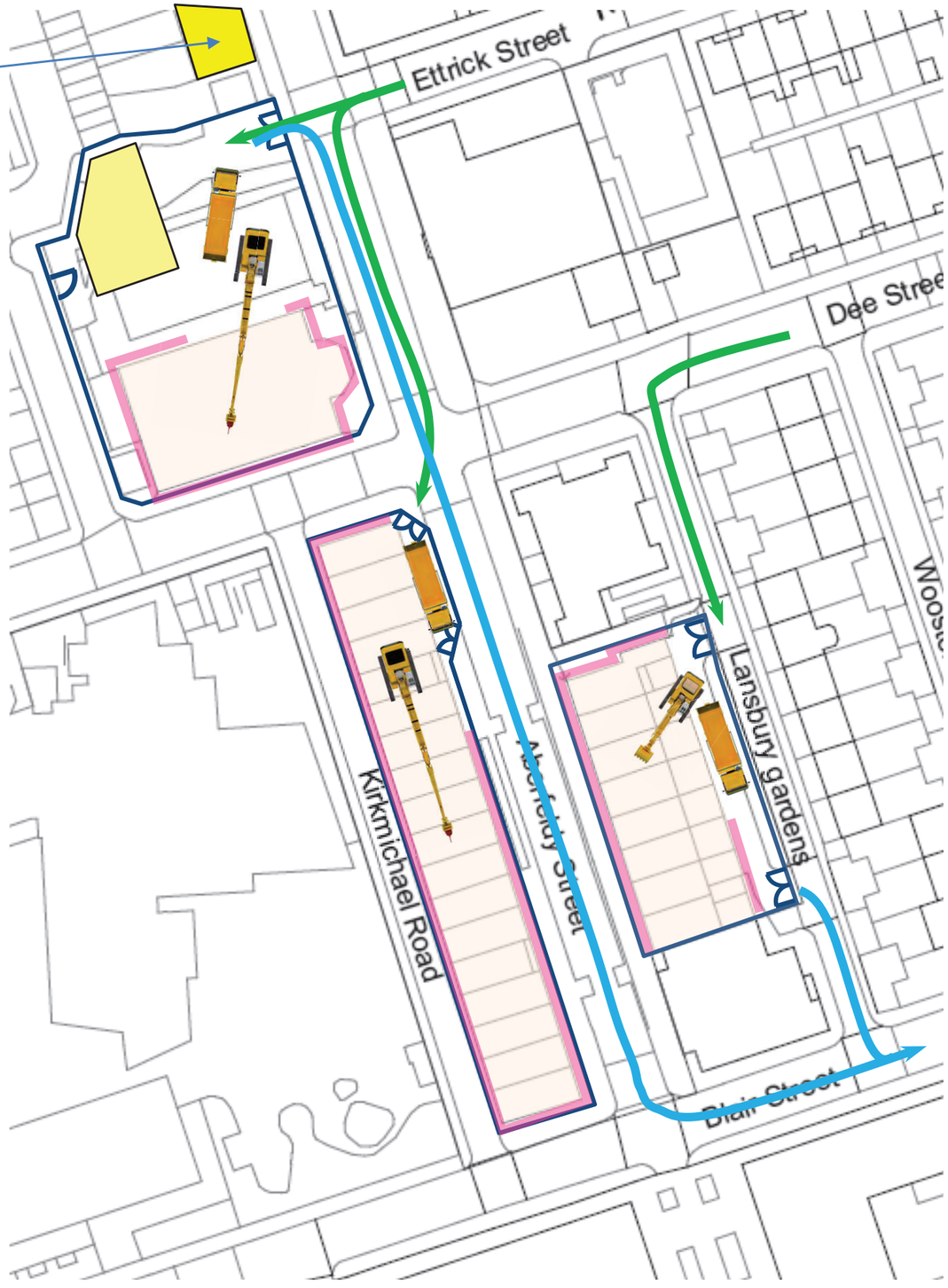
PROJECT: Aberfeldy Village
CLIENT: EcoWorld

TITLE: **Phase A. J1. Construction Logistics**

DRAWING NO.: BSB-AV-001

REVISION NO. & DATE: Rev 0 – 24/09/2021

Jura House –
Project Office



KEY

- Harding/ Gates
- Traditional Scaffold
- Long Reach Excavator
- Site Accommodation
- Traffic Marshal
- Vehicle Access
- Vehicle Egress

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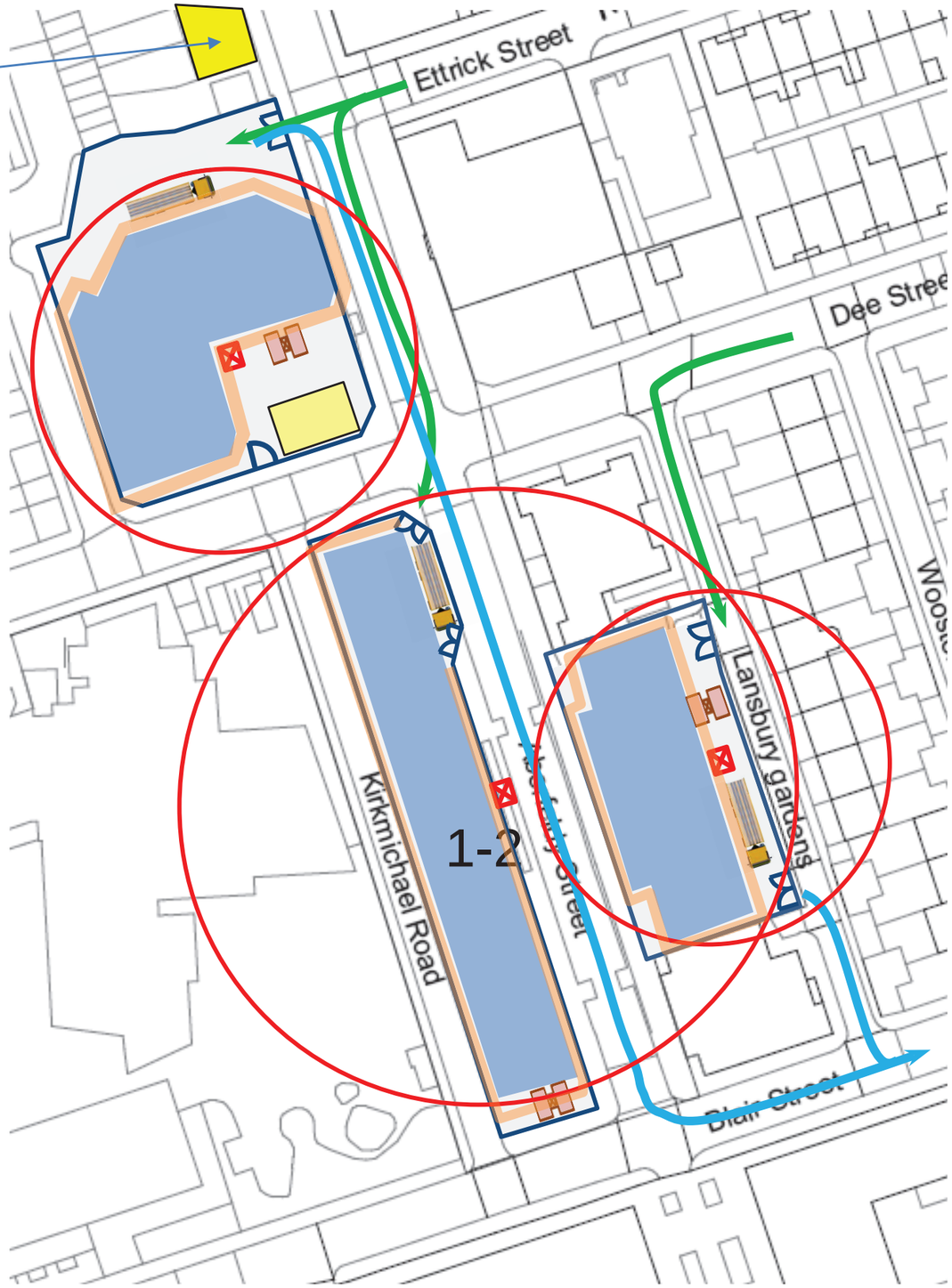
PROJECT: Aberfeldy Village
CLIENT: EcoWorld

TITLE: Phase A. F1 & H1-3. Demolition Logistics

DRAWING NO.: BSB-AV-002

REVISION NO. & DATE: Rev 0 – 24/09/2021

Jura House –
Project Office



KEY

- Harding/ Gates
- Mast Climbers
- Luffing Jib Tower Crane
- Site Accommodation
- Platform Hoists
- Vehicle Access
- Vehicle Egress

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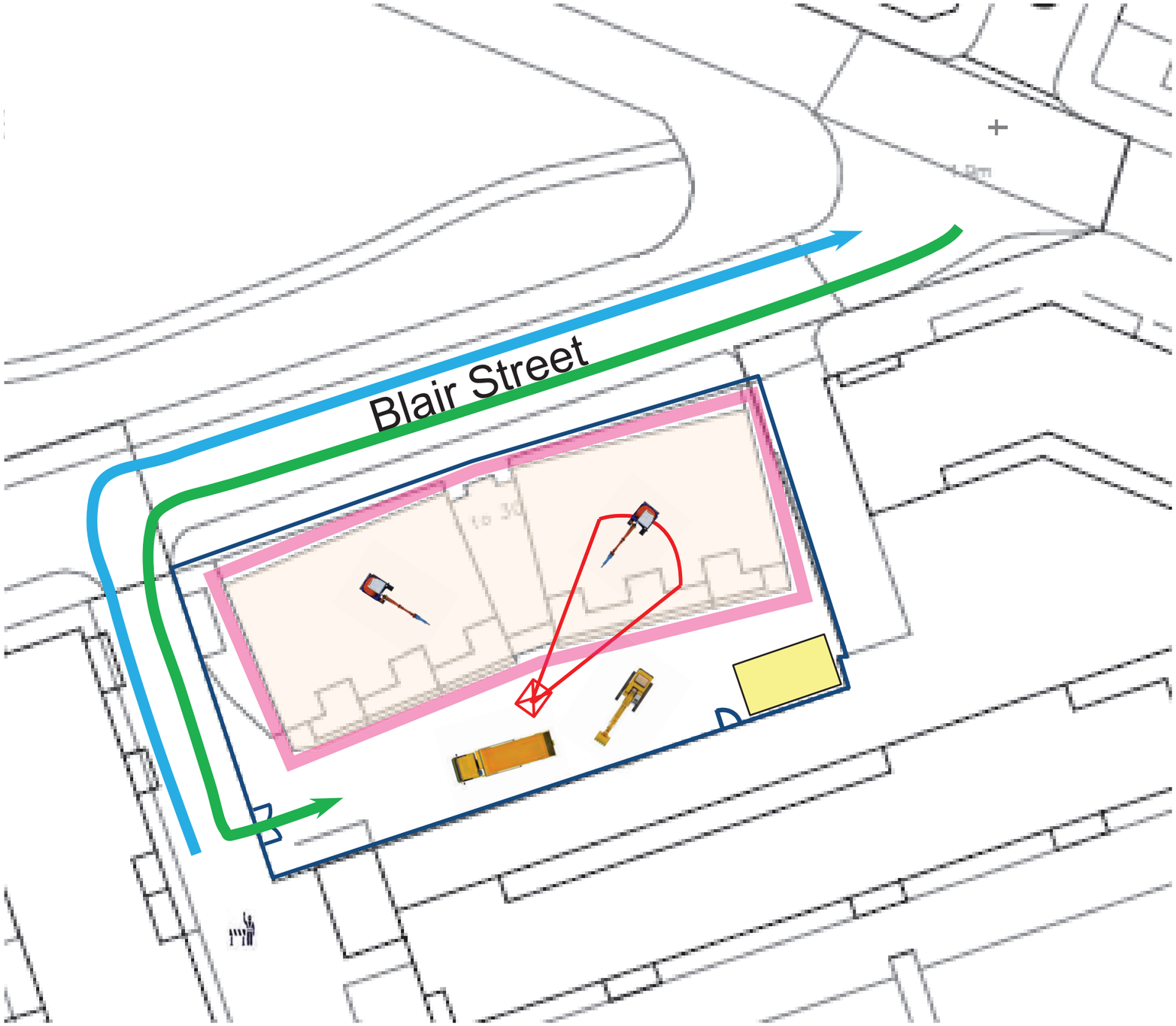
PROJECT: Aberfeldy Village
CLIENT: EcoWorld

TITLE: Phase A. F1 & H1-3. Construction Logistics

DRAWING NO.: BSB-AV-00

REVISION NO. & DATE: Rev 0 – 24/09/2021



KEY

- Harding/ Gates
- Traditional Scaffold
- Mini Excavator/ Breaker
- Site Accommodation
- Traffic Marshal
- Vehicle Access
- Vehicle Egress

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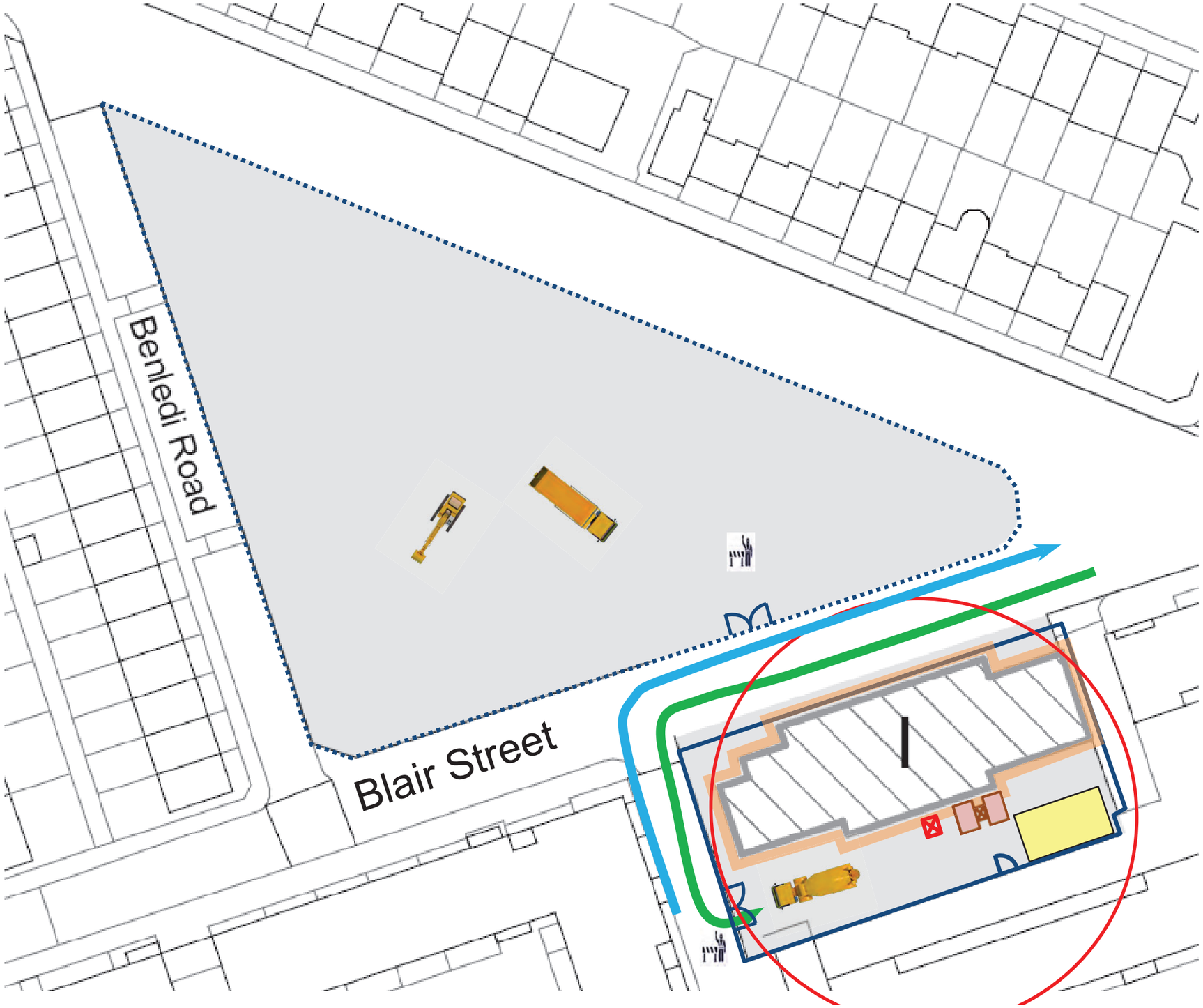
PROJECT: Aberfeldy Village
CLIENT: EcoWorld

TITLE: **Phase A. I1. De olition Logistics**

DRAWING NO.: BSB-AV-004

REVISION NO. & DATE: Rev 0 – 24/09/2021



KEY

- Harding/ Gates
- Heras Fence
- Mast Climbers
- Luffing Jib Tower Crane
- Platform Hoists
- Site Accommodation
- Traffic Marshal
- Vehicle Access
- Vehicle Egress

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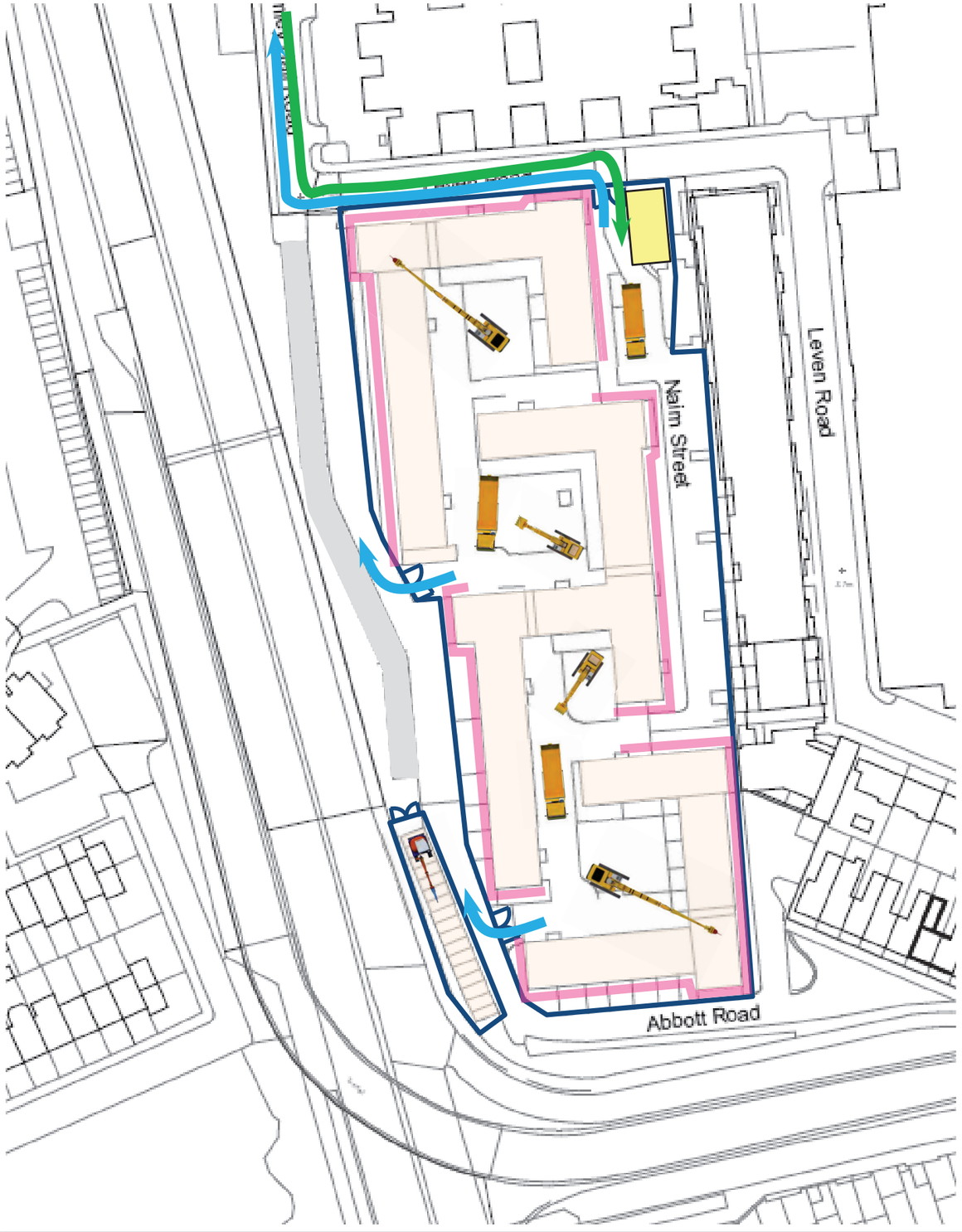
PROJECT: Aberfeldy Village
CLIENT: EcoWorld

TITLE: Phase A. I1. Construction Logistics

DRAWING NO.: BSB-AV-00

REVISION NO. & DATE: Rev 0 – 24/09/2021



Jura House – Project Office

KEY

Harding/ Gates

Traditional Scaffold

Long Reach Excavator

Loader Excavator

Mini Excavator

Site Accommodation

Vehicle Access

Vehicle Egress

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PROJECT: Aberfeldy Village
CLIENT: EcoWorld

TITLE: Phase B. A1-3 B1- . Demolition Logistics

DRAWING NO.: BSB-AV-00

REVISION NO. & DATE: Rev 0 – 24/09/2021

New junction to be constructed and used for construction vehicles until through road available

Existing road layout maintained until new route fully available

Jura House – Project Office

KEY

- Harding/ Gates
- Mast Climbers
- Traditional Scaffold
- Luffing Jib Tower Crane
- Mobile Crane
- Site Accommodation
- Platform Hoists
- Vehicle Access
- Vehicle Egress

BLUE SKY BUILDING
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PROJECT: Aberfeldy Village
CLIENT: EcoWorld

TITLE: Phase B. A1-3 B1- Construction Logistics

DRAWING NO.: BSB-AV-00

REVISION NO. & DATE: Rev 0 – 24/09/2021