

Chapter 2: EIA Methodology

INTRODUCTION

- 2.1** This chapter of the ES sets out the overall approach to and methodology for undertaking the EIA. It details the process for identifying the environmental issues (or 'topics') to be included in the EIA and the method of assessing the likely significant effects that have the potential to arise as a result of the Proposed Development (reference to the Proposed Development throughout this chapter unless specified otherwise refers to the 'October 2021 scheme'), both during the demolition and construction works, and on completion and occupation of the Proposed Development.
- 2.2** The methodology is in accordance with applicable legislation, guidance, and case law and has been tailored to each topic covered by the EIA using industry standard methods and criteria and professional opinion where appropriate. Further detail on how the assessment methodology is applied to each topic is presented within the respective technical chapters of **ES Volume 1** and in **ES Volume 2**.
- 2.3** This chapter is accompanied by several appendices within **ES Volume 3 and ES Volume 4**, these are referenced as relevant throughout this chapter and the remainder of **ES Volume 1**.

EIA GUIDANCE AND POLICY

- 2.4** The ES has been prepared in accordance with applicable legislation, guidance, and case law. Specifically, this ES has been undertaken in accordance with the Institute of Environmental Management and Assessment (IEMA) Quality Mark indicator checklist and with due consideration to the following:
- At a European level, reference has been made to the European Commission's (EC) various EIA guidance documents <http://ec.europa.eu/environment/eia/eia-support.htm>;
 - At a domestic level, reference has been made to the Ministry of Housing for Communities and Local Government's overarching Planning Practice Guidance¹;
 - In addition, the Department for Transport 'Design Manual for Roads and Bridges - Sustainability and Environment, Environmental Assessment'² has been referred to as applicable;
 - In relation to publications from professional bodies, reference has been made to the Institute of Environmental Management and Assessment (IEMA) publications as these include best practice/suggested improvements to the EIA process. This includes:
 - IEMA ES Review Criteria (COM3-6)³;
 - IEMA 'Guidelines for Environmental Impact Assessment' (2004)⁴;
 - IEMA 'Special Report into the State Environmental Impact Assessment Practice in the UK' (2011)⁵;
 - IEMA 'Shaping Quality Development' (2015)⁶;
 - IEMA 'Delivering Quality Development' (2016)⁷;
 - IEMA 'Delivering Proportionate EIA' (2017)⁸; and
 - IEMA 'Major Accidents and Disasters in EIA: A Primer' (2020)⁹.
 - Whilst primarily written for major infrastructure projects, reference is also made to guidance/advice notes published by the National Infrastructure Planning¹⁰ where appropriate, as these can include relevant/helpful information.

Planning Policy

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

National Planning Policy and Guidance

- 2.6** The ES has had regard to the National Planning Policy Framework¹¹ (NPPF). The NPPF sets out the Government's economic, environmental and social planning policies for England. The policies contained within the NPPF articulate the Government's vision of sustainable development, which are intended to be interpreted at a local level, to meet the requirements of local aspirations.
- 2.7** As relevant to the EIA, specifically to the scope, methodology and assessment of effects for the EIA technical topics, the NPPF has been considered throughout the undertaking of the EIA and preparation of the ES.
- 2.8** The EIA has also referred to the National Planning Practice Guidance¹² (PPG), which is an online resource which adds further context to and should be read alongside the NPPF. The PPG aims to make planning guidance more accessible, and to ensure that the guidance is kept up to date.

Strategic Planning Policy and Guidance

- 2.9** The ES has had regard to the following key regional strategic planning documents. Any additional regional planning policy and guidance documents considered relevant to the technical assessments will also be considered:
- The London Plan – The Spatial Development Strategy for Greater London (March 2021)¹³ – hereafter referred to as 'the London Plan'; and
 - Supplementary Planning Guidance (SPG) (i.e. further guidance on policies in the London Plan that cannot be addressed in sufficient detail in the plan itself).

Local Planning Policy

- 2.10** Key local planning policy documents making up the borough's Development Plan that will be considered throughout preparation of the ES include:
- Local Plan – the current Local Plan is comprised of:
 - Core Strategy (2011)¹⁴ – this document sets out Southwark's long-term spatial strategy and strategic policies up to the year 2026, and forms the key document within the suite of planning documents called the 'local development framework'. The Core Strategy sets out the framework for policies used to make decisions on planning applications. Some of the Southwark Plan (2007) has been replaced by the Core Strategy, and eventually all of the Southwark Plan (2007) will be replaced by policies and guidance in the local development framework.
 - Saved Southwark Plan Policies (2007)¹⁵ – a number of policies of the previous Southwark Plan have been saved to be accounted for as part of the current Local Plan;
 - Draft Local Plan, which is comprised of:
 - The New Southwark Plan (NSP) will be a new borough-wide planning and regeneration strategy up to 2033. The LBS submitted the NSP¹⁶ to the Secretary of State for examination on the 16th January 2020. The 'Examination in Public' hearing sessions for the NSP process ended on Friday 30 April 2021. Thereafter, the Council consulted on main modification to the NSP between 7 August 2021 and 24 September 2021. Once finalised and adopted, the NSP will replace the saved Southwark Plan policies and the Core Strategy.
 - The NSP identifies a number of areas for development, providing strategic vision for development opportunities to come forward by way of discrete sites (i.e. site allocations). The site falls within the wider 'London Bridge Area Vision' (AV.11), and forms part of proposed site allocation 'NSP 51: Land between St Thomas Street, Fenning Street, Melior Place and Snowfields', which encompasses a wider area than the site referred within this ES. The strategic vision for the site

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

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

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

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

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

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

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

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

⁹ IEMA, 2020, Major Accidents and Disasters Guidelines

¹⁰ Website - <https://infrastructure.planninginspectorate.gov.uk/>

¹¹ DCLG, 2021; 'National Planning Policy Framework.'

¹² Website - <https://www.gov.uk/government/collections/planning-practice-guidance>

¹³ GLA (2021), The London Plan: The Spatial Development Strategy for Greater London

¹⁴ LBS, (2011); The Core Strategy Development Plan Document 2025

¹⁵ LBS, (2007); Saved Southwark Plan Policies

¹⁶ London Borough of Southwark (2020), New Southwark Plan Proposed Submission Version (<https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/new-southwark-plan?chapter=3>)

allocation includes: re-provide employment floorspace; provide a new north-south link, and high quality public realm, open space and active frontages (along St Thomas Street).

- It is noted this is still a draft emerging development and therefore due weight has been given to this planning policy document where deemed appropriate based on professional judgement, and has been considered throughout the EIA and technical assessments where relevant.
 - Supplementary Planning Documents (SPD) – these documents contain guidance that expands on the policies within the Local Plan. The detailed guidance shows how the council expects the planning policies to be addressed by planning applications; and how the policies will be implemented by the council when making decisions on planning applications.
 - Draft ‘Bankside, Borough and London Bridge SPD (2010)’ (draft BBLB SPD) – prepared to provide guidance for the ‘Opportunity Area’¹⁷, as designated by the London Plan. The document sets out the overall plan and detailed guidance for how development in Bankside, Borough and London Bridge area should occur. The site falls within the London Bridge area of the draft BBLB SPD. The draft BBLB SPD was consulted in 2010 but was put on hold in 2011 to provide support to the local community in preparing a Neighbourhood Plan. The LBS is now in the process of preparing new policies for the BBLB area and the borough as a whole as part of the draft NSP.
 - Neighbourhood Plan:
 - The site is not located within an area designated for a Neighbourhood Plan but is located adjacent to the northern boundary of an area (labelled as ‘Area A’) covered by the ‘Old Bermondsey Neighbourhood Forum’ (OBNF). A application was granted in October 2020 for the designation renewal of the OBNF.
- 2.11 Any additional regional planning policy and guidance documents considered relevant to the technical assessments which are covered by the EIA will also be considered within the respective technical ES Chapter.
- 2.12 In addition, where relevant to the assessment, the technical ES Chapters will also present a summary of any pertinent recognised industry guidance documents.

St Thomas Street East Framework Area – Draft Proposals for Development

- 2.13 The Framework¹⁸ is an initiative by four major individual landowners¹⁹ on St Thomas Street that seeks to agree and develop a cohesive strategy for a series of sites identified for redevelopment within LBS’s current and emerging planning policy. The Framework itself is not adopted policy and is only considered as an initiative reflecting the proponents proposed vision for the area. The initiative has been developed in discussions with LBS in an effort to deliver their aspirations for the area, by providing a joined-up approach to both physical development as well as social and economic regeneration.
- 2.14 The Framework landowners have held five public consultation events since September 2018 to exhibit the ‘framework’ proposals for four potential developments and their immediate surroundings, and how they could further transform St Thomas Street. The last of these consultation events were held over the first half of 2019 and their results were used to feed into the Design Framework document (version 3.0)²⁰. The Framework has been further updated in May 2021 by the Framework landowners to reflect the focused adjustments to the Vinegar Yard scheme and updates to the other developments being progressed on St Thomas Street East. Further details of the Framework are considered within **ES - Chapter 3: Alternatives and Design Evolution (Volume 1)**, with regard to how it has been taken into consideration as part of the design evolution of the Proposed Development.

¹⁷ Designated areas identified having significant capacity for development, such as housing or commercial use, and existing public transport access.

¹⁸ St Thomas Street East Design Framework. Website: <https://stthomasstreteast.co.uk/> (accessed September 2021).

¹⁹ The individual landowners comprise CIT, Greystar, Columbia Threadneedle and Sellar.

EIA SCOPING AND CONSULTATION

Consultation

- 2.15 Consultation is an ongoing process and has been fed back into the design of the Proposed Development. **ES Chapter 3 - Alternatives and Design Evolution (Volume 1)** of this ES provides a review of the consultation undertaken in respect of the alternatives considered by the Applicant and the design evolution of the Proposed Development (including the design response to LBS’s proposed reason for resolving to refuse the December 2018 Application, specifically in relation to environmental considerations).
- 2.16 The planning application is supported by a Planning Statement²¹ and a Community Update Report²² which together summarise the wider consultation that has been undertaken with various consultees throughout the pre-application consultation process.

EIA Scoping

- 2.17 Scoping forms one of the first stages of the EIA process and it is through EIA scoping that the Local Planning Authority (LPA) are consulted on those environmental topics that should be included in the scope of the EIA.
- 2.18 Through the scoping process, a number of matters and issues are addressed, including:
- Identification of the availability of baseline data and appropriate surveys to be undertaken;
 - Identification of sensitive receptors;
 - Identification of potential environmental considerations and potential environmental effects;
 - Identification of the topics to be included within the scope of the EIA and the methodology for assessment;
 - Identification of any topics that can be scoped out of the EIA, with justification provided as to why likely significant environmental effects are not anticipated;
 - Definition of the methodology for the assessment of the likely significant environmental effects; and
 - Identification of other development schemes to be considered within a cumulative effects assessment.
- 2.19 In respect of the proposals as they were in 2018, the Applicant prepared and submitted informally to the LBS an EIA Scoping Report for discussion (the ‘informal Scoping Report’) on the 24th September 2018. The EIA Scoping Report requested feedback on the proposed scope of the EIA for the 2018 scheme for the site, including the proposed approach to the assessments for the technical topics scoped in for the EIA.
- 2.20 Feedback on the informal Scoping Report was received from the LBS (29th November 2018) in the form of a high level review (the ‘LBS Review’) of the content within the report submitted and with recommendations for consideration within the ES. A copy of the informal Scoping Report is provided in **ES Volume 3 – Appendix: EIA Methodology, Annex 5**.
- 2.21 Following the Application’s recovery by the Mayor, the GLA is now the Local Planning Authority. The scoping process for the 2018 scheme was undertaken in detail and has provided the Applicant and Trium with sufficient knowledge of the site and the surrounding area to be able to determine the scope of the EIA for the Proposed Development. In addition, although the Proposed Development is different to the 2018 scheme, the Proposed Development still presents an urban redevelopment scheme with a tall building component and comprising of non residential land uses. While it is acknowledged that the surrounding development context is evolving (through the submission of planning applications for neighbouring and nearby land), the development that is now to be sought for approval, in EIA terms, is not fundamentally different to the 2018 Proposed Development.
- 2.22 It was therefore not considered, by the Applicant and Trium, necessary to re-scope the EIA for either the December 2020 ES or the October 2021 ES and to broadly base the EIA scope on the following:
- The 2018 informal EIA Scoping Report;

²⁰ KPF Associates (for STSE Landowners), May 2019. St Thomas Street East - Design Framework 3.0. Available: https://stthomasstreteast.co.uk/wp-content/uploads/2019/06/190516_STSE_Design-Framework-KPF_3.0_00_lowres.pdf (accessed November 2020).

²¹ Planning Statement: Montagu Evans; 2021

²² Community Update Report: Four Communications; 2021.

- The LBS high level review of the 2018 informal EIA Scoping Report (informal Scoping Opinion);
 - The 2018 Environmental Statement (ES) and 2019 Supplementary Cumulative Effects Assessment ES Addendum that was undertaken as part of a Regulation 25 Request from the LBS during the validation of the planning application for redevelopment at this site in 2018 (planning reference number: 18/AP/4171²³); and
 - The Land Use Consultants (LUC) review of the 2018 ES and 2019 Supplementary Cumulative Effects Assessment ES Addendum, and Trium's subsequent response document to the ES Review.
- 2.23** This approach was agreed with the GLA (an EIA Approach Note was issued on 21st October 2020 and during an EIA scoping discussion on 8th September 2021). The 2018 informal EIA Scoping Report, LBS High Level Review of the 2018 informal EIA Scoping Report and LUC Review of the ES and 2019 Supplementary Cumulative Effects Assessment ES Addendum and Trium's subsequent response document to the ES Review can be found in **ES Volume 3 – Appendix: EIA Methodology – Annex 6**. The EIA Approach Note issued in October 2020 can also be found in **ES Volume 3 – Appendix: EIA Methodology – Annex 4**.
- 2.24** Since the EIA Scoping exercise was undertaken in 2018, a series of design changes have been made to the Proposed Development (as set out within **ES Chapter 0 – Preface (Volume 1)**) and in acknowledgement of this, a meeting was held with the GLA officers on 8th September 2021 to confirm the approach to the EIA in light of these design changes, specifically in relation to the assessment of the flexible use class options and the massing changes.
- 2.25** It was agreed that those topics whose assessments use the area schedule and therefore rely on the type and quantum of specific use classes (i.e. Traffic and Transport, Socio-economics, Air Quality, Noise and Vibration and Greenhouse Gas Emissions) will assess both Option 1 and Option 2 as discussed in **ES Chapter 0 – Preface (Volume 1)** and presented in **ES Chapter 1 – Introduction (Volume 1)** and, therefore, two separate impact assessments will be presented unless stated otherwise.
- 2.26** In terms of the massing related topics, Wind, Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution assessments were undertaken in December 2020 for the December 2020 scheme. The further design changes made since these December 2020 assessments were undertaken have been reviewed by the technical specialists. The design changes of relevance have been summarised below and are described in further detail within **ES Chapter 3 – Alternatives and Design Evolution (Volume 1)**:
- A reduction in massing to the eastern part of the Main Building resulting in the introduction of a terrace at Level 13;
 - The relocation of affordable workspace entrance to align with the masterplan east – west route;
 - An additional entrance along the northern elevation on ground level to the retail hall and two additional entrances along the southern elevation on ground level to the retail hall; and
 - Minor amendments to the landscaping and urban greening factor as a result of the additional terrace at Level 13.
- 2.27** Upon review of these further design changes by the technical specialists, it was considered that they were not materially different enough to warrant a rerun of these assessments and, therefore, the changes have instead been assessed qualitatively. This approach was agreed with the GLA at the meeting on 8th September 2021.
- 2.28** For further details refer to **ES Chapter 11: Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution (Volume 1)** and **ES Chapter 10: Wind Microclimate (Volume 1)** for more information.
- 2.29** In addition to these topics, it was also agreed with the GLA at the meeting on 8th September 2021 that due to the sensitivity of townscape, heritage and visual receptors, a full update to the December 2020 Built Heritage, Townscape and Visual Impact Assessment would be undertaken and is provided in **ES Volume 2** of this ES. It is important to note that this ES is a comprehensive 'update' of the ES that was originally submitted in support of this planning application (Southwark Ref. 18/AP/4171, and now GLA ref. GLA/6913/S2) that was submitted by the Applicant to the LBS in 2018. This 'updated' 2021 ES replaces, in its entirety, the December 2018 ES. A full replacement ES has been provided so that the environmental information now before the decision maker in respect of this planning application (ref. GLA/6913/S2) is comprehensive in that it address not only the

amendments made to the Proposed Development but also relevant baseline conditions, potentially sensitive receptors, the emerging site context as well as legislative and planning policy requirements.

'Scoped In' Disciplines

- 2.30** Following a review of the informal EIA Scoping process undertaken in 2018, and new and emerging policy, the following environmental disciplines have been identified to potentially give rise to likely significant effects and have therefore been addressed in this ES:
- Demolition and Construction;
 - Socio-economics;
 - Traffic and Transport;
 - Air Quality;
 - Noise and Vibration;
 - Wind Microclimate;
 - Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution;
 - Archaeology;
 - Heritage, Townscape and Visual Impact Assessment;
 - Climate Change - In accordance with Schedule 4, paragraph 5(f) of the EIA Regulations, to consider "the impact of the project on climate" and "the vulnerability of the project to climate change", consideration is given within this ES to greenhouse gases that would be generated by the Proposed Development (presented as a standalone report included in **ES Volume 3**), as well as the Proposed Development's resilience to climate change (addressed across the ES as a whole, and discussed in more detail below); and
 - Health (the topic of health is discussed in greater detail below).

Effects of Climate Change on the Proposed Development

- 2.31** The approach to assessing the potential impact of climate change on the Proposed Development has been undertaken in accordance with the IEMA guidance '*Climate Change Resilience and Adaption*' (2020)²⁴, which presents a framework for the consideration of climate change resilience and adaption in the EIA process. It recognises a need for a proportionate approach to the assessment, due to the uncertainties associated with predicting how the environment will respond to climate change.
- 2.32** Consistent with the guidance, the ES describes a future climate scenario (**ES Volume 3 – Appendix: EIA Methodology- Annex 3**) which has been developed through the use of the future climate projections published by the Met Office (through the UK Climate Projections (UKCP18) website). The results include projections for variables including annual mean temperatures, and annual changes in summer and winter precipitation.
- 2.33** Each technical chapter within this ES has considered, using the UKCP18 scenario, the potential for any additional or different impacts and associated effects of climate change on the Proposed Development. This has been quantified where possible, and, where not possible, a qualitative review has been presented.
- 2.34** The ES presents the adaption and resilience measures proposed as part of the description of the Proposed Development (**ES Chapter 4 - The Proposed Development (Volume 1)**), and where relevant within the technical ES Chapters.

Health

- 2.35** The EIA Regulations requires that the EIA must '*...identify, describe and assess in an appropriate manner... the significant effects of the proposed development [in terms of] - human health,...*' (Regulation 4(2) and Schedule 4(4)).

²³ The 2018 ES and 2019 Supplementary Cumulative Effects Assessment ES Addendum can be found on the LBS planning portal at the following link: <https://planning.southwark.gov.uk/online-applications-old/>

²⁴ Institute of Environmental Management and Assessment, (2020); Environmental Impact Assessment Guide to: Climate Change Resilience and Adaptation.

- 2.36 The LBS high level review of the informal EIA Scoping Report in 2018 agreed that due to the Proposed Development delivering commercial uses (and not residential), a full health impact assessment was not considered necessary to warrant consideration within the socio-economic chapter.
- 2.37 However, in order that the scheme's assessment appropriately addresses emerging policy aspirations, a Rapid Health Impact Assessment (HIA) has been undertaken and can be found in **ES Volume 3 – Appendix: Health**. In addition, the health effects identified within the HIA have been included within the assessment of effect interactions within this ES (**ES Chapter 13 - Effect Interactions (Volume 1)**) and health is also considered within the chapter of this ES that concludes on the likely significant effects of the Proposed Development and the overall conclusions of the EIA (**ES Chapter 14 - Likely Significant Effects and Conclusions (Volume 1)**). Furthermore any mitigation measures relating to health will be reported within **ES Chapter 15 – Mitigation and Monitoring Schedule (Volume 1)** and summarised within the Non-Technical Summary submitted as a separate document alongside the ES. This approach ensures that health is proportionately addressed throughout the ES.

Topics Scoped Out of the EIA

- 2.38 The EIA Scoping process in 2018 identified several environmental topic areas which are not likely to give rise to significant environmental effects and therefore would not need to be assessed further as part of the EIA. Full details of the justification for scoping these topics out can be found within Annex A of this ES Chapter as well as the 2018 informal EIA Scoping Report and Trium's Response to the review of the 2018 ES and 2019 Supplementary Cumulative Effects Assessment ES Addendum, both of which are presented in **ES Volume 3 - Appendix: EIA Methodology – Annex 5**.
- 2.39 In summary, the topics scoped out of the EIA include:
- Water Resources, Drainage and Flood Risk;
 - Ecology (however biodiversity is addressed in **ES Chapter 4 – The Proposed Development (Volume 1)** and **ES Volume 3 – Appendix: Ecology**;
 - Geoenvironmental (Land Contamination, Ground Conditions and Groundwater);
 - Electronic Interference;
 - Waste;
 - Project Vulnerability; and
 - Land Take and Soils.

ENVIRONMENTAL IMPACT ASSESSMENT METHODOLOGY

- 2.40 The method behind the EIA process generally considers the existing conditions of the area into which the development is being introduced (**the baseline**), providing a future baseline context for assessments where relevant, and makes reasonable predictions of the likely change (**the impact – in terms of magnitude**) that may occur, during both its construction and when the development is completed and operating as proposed. The predicted impact is considered in terms of key environmental and social aspects (**receptors**) found within the surrounding area, and based on their sensitivity to change, the scale of the resulting change experienced by the receptor / resource (**the effect**) is then determined along with a statement on whether the effect is significant or not.
- 2.41 Any mitigation measures required to reduce or eliminate adverse effects are then considered and assessed, with the resulting residual effect scale being determined as significant or not.
- 2.42 Effects resulting from a combination of the Proposed Development and other surrounding schemes (**cumulative schemes**) are also assessed. All the likely effects of the Proposed Development are reported (**within this environmental statement**) and the likely significant effects are specifically highlighted.

Baseline Conditions

- 2.43 The purpose of the EIA is to predict how environmental conditions may change as a result of the Proposed Development. The assessment of the nature and scale of a predicted change is undertaken against a reference condition, known as the 'baseline'. In most cases, the baseline represents the environmental condition of the site and the surrounding area at the time of the assessment. However, the Traffic and Transport, Air Quality and Noise and Vibration assessments include projected future environmental condition(s) (e.g. future road traffic flows). The anticipated future baseline/opening year for the Proposed Development is 2025 (**ES Chapter**

5 - Demolition and Construction (Volume 1)). Further details on the methodology for defining the future environmental conditions are provided within the relevant technical chapters (**ES Chapter 7 - Traffic and Transport; ES Chapter 8 - Air Quality; and ES Chapter 9 - Noise and Vibration (Volume 1)**).

- 2.44 Baseline assessments utilise any existing and available information, as well as new information either collected through baseline surveys undertaken during the course of the EIA process or additional information provided as part of the EIA Scoping and the consultation process. This information has been used to present within the ES (within the individual technical chapters) an up to date description of the current baseline conditions of the site and surrounding area. For some topics however, such as traffic and transport and noise and vibration, the baseline data has been obtained from that used to assess the 2018 scheme and has not been updated. This is due to the impact of Covid-19 on the ability to currently collect representative data. It is therefore considered that the 2018 data is a representative data set. For other topics, that require qualitative review of desktop third party data (such as ecology, archaeology and socio-economics) to form their baseline, these have been updated to reflect the 2021 (or nearest year of available data) conditions.

Evolution of the Baseline

- 2.45 In accordance with the requirements of the EIA Regulations, consideration is given as to how the existing baseline condition may evolve in the future in the absence of the Proposed Development. The EIA Regulations state that an ES should provide (Schedule 4(3)):

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

- 2.46 This requirement is presented within each of the individual technical ES Chapters under the heading 'Evolution of the Baseline Scenario'. The evolved baseline is a baseline condition at an indeterminate point in the future and assumes that the site, has naturally evolved in the absence of the Proposed Development being implemented. In most cases this is a qualitative approach (based on professional opinion), but in some instances may be quantitative.
- 2.47 The approach taken to providing an outline of the evolution of the baseline is described within each of the individual technical ES Chapters (**ES Chapters 6 to 12 (Volume 1)**, and **ES Volume 2**).

Potentially Sensitive Receptors

- 2.48 When undertaking an EIA, it is important to identify key potential receptors from the surrounding baseline context which may be impacted by the Proposed Development and may need to be considered as part of the assessment.
- 2.49 Within each of the technical ES Chapters (**ES Chapters 6 to 12 (Volume 1)**, and **ES Volume 2**), a list of sensitive receptors is presented which are considered to have the potential to be affected by the Proposed Development.
- 2.50 The sensitive receptors identified within the technical ES Chapters have been identified from a review of the available information collected as part of the description of the surrounding environmental and socio-economic context, as well as from historic and currently available information relating to the site itself. Potentially sensitive receptors have also been identified from a review of the Proposed Development sought for approval (see **ES Chapter 4 - The Proposed Development (ES Volume 1)**) and the potential impacts and resultant effects which may occur as a result of the Proposed Development.

IDENTIFICATION OF IMPACTS, EFFECTS AND EFFECT SIGNIFICANCE

Terminology and Definitions

Reference to 'Impact' and 'Effect'

- 2.51 The terms 'impact' and 'effect' are distinctly different. Having gained an understanding of the likely impact it is then important to know whether the change in environmental or socio-economic conditions results in a significant environmental effect. The impacts of the Proposed Development may or may not result in significant effects on the environment, depending on the sensitivity of the resource or receptor and potentially other factors

(such as duration). The assessment of the likely significant effects of the development is a requirement identified by Schedule 4 of the EIA Regulations.

Receptor Sensitivity and Magnitude of Impact

2.52 To achieve a consistent approach across the different technical disciplines addressed within the ES, assessments broadly define the sensitivity of the receptors that could be affected by the Proposed Development and the magnitude of impact or change from the baseline conditions in order to derive the resultant effect. Technical specialists have used their own approach or amended the approach stated below based on what is appropriate for their assessments.

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

- High;
- Medium;
- Low; or
- Negligible.

2.54 Where there is no impact/change, no assessment will be required due to there being no potential for significant effects.

2.55 Each of the technical assessment chapters of the ES (*ES Chapters 6 to 12 (Volume 1)*, and *ES Volume 2*) provide further detail on the definition of each of the above terms specific to the topic in question and also provide the criteria, including sources and justifications, for quantifying the different levels of receptor sensitivity and 'impact magnitude'. Where possible, this is based upon quantitative and accepted criteria (for example, national standards for air quality and noise), together with the use of value judgement and expert interpretation.

Likely Significant Effects

Identification of a Resultant Effect

2.56 The basis for determining the resultant effect generally takes into account the sensitivity of the receptor and magnitude of impact or change from the baseline conditions. A generic matrix that combines the sensitivity of the receptor and the magnitude of impact to identify the resultant effect is provided within **Table 2.1** (although where this differs for a technical topic, this has been clearly stated in the topic's methodology).

Table 2.1 Resultant Effects

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

Identification of Scale of Effect

2.57 The categories and definitions of the 'scale' of the resultant effect i.e. definitions of Major, Moderate, Minor and Negligible effects. The definitions may be adjusted to suit the technical topic in question; where this is the case revised definitions of effect scale are presented in the technical assessment chapters (*ES Chapters 6 to 12 (Volume 1)*, and *ES Volume 2*).

2.58 Where there is no impact to a receptor and therefore no effect, this is stated.

Effect Nature

2.59 **Table 2.2** provides a definition of the 'nature' of the resultant minor, moderate or major effect²⁵, i.e. through definitions of Adverse, Beneficial and Neutral/Balanced.

Table 2.2 Definition of the Nature of the Effect

Nature of Effect	Description
Adverse	Detrimental or negative effects to an environmental / socio-economic resource or receptor. The quality of the environment is diminished or harmed.
Beneficial	Advantageous or positive effect to an environmental / socio-economic resource or receptor. The quality of the environment is enhanced.
Neutral/Balanced	Either there is no noticeable beneficial or adverse effect, or the effect is considered neither beneficial nor adverse overall, having made a 'net equation' judgment that takes into account both beneficial and adverse impacts.

Geographic Extent of Effect

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

Effect Duration

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

Direct and Indirect Effects

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

Significance of Effect

2.63 Following identification of an effect and the implementation of mitigation measures, the residual effect's scale, nature, geographic extent and duration and whether the effects are direct or indirect, using the above summarised terminology, has been summarised in a clear statement within *ES Volume 1* and *ES Volume 2* and used to ascertain as to whether the residual effect is significant or not significant. Each technical assessment determines at what scale an effect is deemed to be significant, as this varies depending on the topic.

2.64 As a general rule, the following applies (although where this differs for a technical topic, this has been clearly stated in the topic's methodology):

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

2.65 Where mitigation measures are identified to either eliminate or reduce potential adverse effects, these have been incorporated into the ES, for example either through the design, or will be translated into demolition and construction commitments; or operational or managerial standards / procedures. It should be noted that mitigation is not required for effects that are deemed to be negligible as the effect will be imperceptible.

²⁵ As negligible effects are defined as being imperceptible, the nature of the effect is not relevant. However, where a technical author considers that applying a nature to a negligible / imperceptible effect would benefit the assessment, this has been done in the relevant technical chapters (e.g. in *ES Chapter 7 - Traffic and Transport (Volume 1)* and *ES Volume 2*)

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

2.67 In addition, each technical ES Chapter provides a comparison of the likely significant environmental effects defined within this ES with the likely significant environmental effects defined in the 2018 ES in respect of the earlier proposals for this site's redevelopment.

Impact Assessment – General Methodology

2.68 Detailed methodologies for the assessment of each of the environmental topic areas scoped into the EIA are provided within each technical chapter of **ES Volume 1** and in **ES Volume 2**, however, in general terms, the assessments have been based upon (as appropriate):

- Desk-top studies;
- Site surveys;
- Consideration of relevant legislation;
- Consideration of relevant planning policies (national, regional and local);
- Consideration of potentially sensitive receptors that could be affected by the Proposed Development;
- Identification of likely environmental impacts, with an evaluation of their likely magnitude, and resultant effects in terms of their nature, scale, geographic extent, duration and whether they are direct or indirect or transboundary;
- Consideration of the requirement for any specific mitigation;
- Expert opinion;
- The use of technical guidance and best practice; and
- Specific consultations with appropriate organisations.

2.69 Mitigation is the term used to refer to the process of avoiding where possible and, if not, minimising, controlling and/or off-setting potentially significant adverse effects of a development. Mitigation measures can relate to the design stage; the demolition and construction stage; or the activities associated with the operation of the completed Proposed Development.

2.70 As part of the EIA, an iterative approach has been adopted where significant environmental effects have been avoided where possible in the first instance through design refinements and iterations, as reported upon within **ES Chapter 3 - Alternatives and Design Evolution (Volume 1)**. Where adverse environmental effects were identified through early assessment work, opportunities to reduce or control impacts and effects have been identified and incorporated into the Proposed Development. In addition, opportunities to enhance the beneficial environmental effects of the Proposed Development have also been sought and incorporated into the Proposed Development.

2.71 Within each technical chapter of this ES, the assessment of the potential effects that are likely to arise because of a potential impact/change to receptors from the Proposed Development is initially presented. If any mitigation measures are required, further to that already integrated into the Proposed Development throughout its evolution, these are incorporated, and the Proposed Development is reassessed to ascertain the likely residual effects and any which are significant. This is reported on within each technical chapter of this ES (**Volumes 1 and 2**).

2.72 How the Proposed Development might affect the environment, relies on predictions about what impact a certain action will have. Some predictions can be made using mathematical or simulation models. Other impacts are less easy to predict in quantitative terms. In such cases, the EIA attempts to quantify the anticipated scale of impact using professional judgement.

Assessment Scenarios

2.73 Each of the technical topic areas that have the potential for significant effects consider the following scenarios within their assessments:

- The demolition and construction works associated with the Proposed Development;
- The completed and operational Proposed Development; and

- Cumulative – the Proposed Development with other surrounding development schemes, often referred to as 'cumulative schemes.'

2.74 To establish the cumulative massing effects of the emerging schemes along St Thomas Street, a number of further cumulative scenarios have been undertaken for the wind microclimate, daylight, sunlight and overshadowing assessments as well as the visual impact assessment within **ES Volume 2**. The cumulative schemes include the approved Capital House scheme at 40 – 46 Weston Street (ref. 18/AP/0900), the scheme referred to as the 'Edge' scheme at 60 – 68 St Thomas Street (ref. 20/AP/0944) which has Resolution to Grant and the undetermined scheme known as the 'Sellar' scheme at 40-44 Bermondsey Street (ref. 19/AP/0404). These additional scenarios are set out as per the following:

- Proposed Development with the 'Capital House' scheme;
- Proposed Development with the 'Capital House' scheme + 'The Edge' scheme and 'Sellar' scheme; and
- Proposed Development with the 'Capital House' scheme + 'The Edge' scheme and 'Sellar' scheme + any other cumulative schemes further afield within the relevant study area radius.

2.75 As discussed earlier at **Paragraph 2.26**, the Wind and Daylight, Sunlight and Overshadowing assessments were undertaken in 2020 in relation to the December 2020 scheme. At the time of this assessment, the Edge scheme was undetermined and had therefore been assessed as such as per the scenarios above alongside the other schemes yet to be determined. Although it is acknowledged that the scheme now had Resolution to Grant, the change in status does not have any implication on the outcomes of the wind and daylight, sunlight and overshadowing cumulative assessments as the scheme was considered regardless as part of the cumulative assessments.

Demolition and Construction

2.76 The **ES Chapter 5 – Demolition and Construction (Volume 1)** provides an outline of the anticipated demolition and construction programme, as well as related activities and aspects (i.e. demolition works, substructure works, superstructure works etc., excavation volumes and construction material quantities, HGV movements and HGV routing).

2.77 The programme represented is based on reasonable assumptions in terms of the sequencing of the works and site logistics that will be implemented. The programme is considered achievable based on the current level of demolition and construction planning and anticipates the period of demolition and construction works are continuous. The programme presents an overlap of construction activities with other stages of work and therefore assumes multiple construction activities occurring across the site. It is also assumed that impacts of a higher magnitude over a shorter duration are considered to be potentially greater in terms of the likely effect on a receptor, than an impact of lower magnitude spread over a longer duration. The EIA, therefore assesses the worst case effects (in terms of magnitude of impact) as a result of multiple construction activities occurring on-site at any particular time.

2.78 The construction materials, waste quantities and vehicle movement figures for assessment are based on the December 2020 scheme which assumed that 13,868m² GEA of floorspace of the Main Building would comprise D1 medical use (similar to the use class breakdown under Option 1 for the Proposed Development). It is considered that the Proposed Development will either generate the same material and waste quantities and resultant vehicle movements as the December 2020 scheme or the Proposed Development will result in no more than a 5% reduction in line with the minor massing change. Therefore, using the materials, waste quantities and vehicle movements associated with the December 2020 scheme represents a worst-case assessment approach.

2.79 The information presented will inform the demolition and construction impact assessments of each technical ES Chapters (**ES Chapters 6 to 12 (Volume 1)**, and **ES Volume 2**).

2.80 Within the construction impact assessments, standard environmental controls required under legislation and best practice guidance will be considered (i.e. embedded mitigation) and will be clearly presented within the respective technical ES Chapter as to how they are accounted for within the assessment (i.e. pre and post mitigation).

2.81 The construction assessments will also identify where required the need for any additional or bespoke environmental management or mitigation measures in order avoid, prevent, reduce or off-set any significant adverse effects identified.

- 2.82** Where required, a description of any proposed monitoring arrangements will also be presented and would define (where appropriate) the procedures regarding the monitoring of the relevant significant adverse effects, the types of parameters to be monitored and the monitoring duration.
- 2.83** All the measures proposed within the technical ES Chapters will be compiled and presented in a mitigation and monitoring schedule within **ES Chapter 15 – Mitigation and Monitoring (Volume 1)**.
- 2.84** It is anticipated that any required construction related environmental management / mitigation and monitoring measures identified within the ES would be secured and controlled through appropriate Construction Environmental Management Plan (CEMP) (or equivalent) and it is proposed that the requirement for these documents be secured by means of suitably worded planning conditions to be attached to the permissions (if granted). Key mitigation and management controls that would later form part of a CEMP will be presented in the ES and particularly in **ES Chapter 5 - Demolition and Construction** and **ES Chapter 15 - Mitigation and Monitoring (Volume 1)**, to help define the policies, procedures and management framework for the implementation of any identified specific environmental management and mitigation controls and monitoring.

Completed and Occupied Development

- 2.85** The ES presents a description of the Proposed Development in **ES Chapter 4 - Proposed Development (Volume 1)** in order to provide suitable context to enable the assessment of potential and likely significant environmental effects. Sufficient information on the Proposed Development, in terms of the key aspects (as listed below), will be presented to allow an understanding of the development being proposed, in order to enable the assessment of potential and likely significant environmental effects of the completed and occupied development. Any assumptions made will be clearly presented in the narrative.
- 2.86** Information on the details of the Proposed Development sought for approval are provided in **ES Chapter 4 - Proposed Development (Volume 1)** and include but are not limited to:
- Layout – building footprints;
 - Scale – the massing, specifically heights of buildings;
 - Quantum– floor areas and use classes;
 - Appearance – architectural detail and materiality;
 - Access and egress – vehicular, pedestrian and cyclist accessibility into, out of and around the site;
 - Parking provision – specifically cycle;
 - Deliveries and servicing strategy – including overview of estimates of the types and quantities of waste anticipated and strategy for waste storage, handling and collection;
 - Proposed energy strategy; and
 - Landscaping – including planting strategy, species and habitats.

CUMULATIVE EFFECTS

- 2.87** The EIA Regulations require that, in assessing the effects of a particular development proposal, consideration should also be given to the likely significant effects arising from the “*cumulation with other existing and/or approved projects*” (Schedule 4, 5(e)).
- 2.88** Cumulative effects can occur as interactions between the effects associated with a number of projects in an area which may, on an individual basis be insignificant, but together (i.e. cumulatively), result in a significant effect. Cumulative effects arising from the Proposed Development in combination with other reasonably foreseeable existing or approved development schemes (‘cumulative schemes’) has been considered throughout the ES. The potential for cumulative effects arising during the construction works and once the Proposed Development is complete and operational is considered.
- 2.89** Each individual technical chapter of the ES presents an assessment of the cumulative effects of the Proposed Development coming forward alongside other surrounding cumulative schemes.
- 2.90** Cumulative effects arising from the Proposed Development in combination with other surrounding development schemes or ‘cumulative schemes’ during the construction works and also once the Proposed Development is complete are considered by the EIA. The EIA Regulations require an assessment of potentially significant

cumulative effects of the Proposed Development along with other developments. There are no legislative or policy requirements which set out how a cumulative impact assessment should be undertaken.

- 2.91** The cumulative schemes that are considered within the ES are typically located within a 1km radius from the centre of the site as this spatial extent is considered appropriate for determining cumulative effects in this locality based on experience and professional judgement.
- 2.92** This catchment area has been set to provide a reasonable study area for the assessment of cumulative effects. It is acknowledged that for certain topics of the EIA (specifically townscape and visual), there is a need to consider more distant schemes within the cumulative effects assessment. This is appropriate, given the view locations associated with the townscape and visual impact assessment.
- 2.93** The criteria for the cumulative schemes included within the cumulative effects assessment include the following:
- Are located within a 1km radius from the center of the Proposed Development;
 - Have full planning consent, a resolution to grant consent, or are applications that have been submitted but not yet determined;
 - Produce an uplift of more than 10,000 m² (Gross External Area (GEA) of mixed-use floorspace), or over 150 residential units; and
 - Any office to residential conversions (granted under the General Permitted Development Order) giving rise to more than 150 residential units.
- 2.94** The criteria listed above have been set to allow all the schemes coming forward within the LBS (and adjacent boroughs of the City of London and Tower Hamlets) to be subject to an initial screening exercise to determine the schemes that, based on the scale of redevelopment (amount and mix of uses), could potentially have a cumulative effect with the Proposed Development and should be considered further within the cumulative effects assessment of the EIA.
- 2.95** By applying these criteria to all the schemes coming forward, the cumulative effects assessment of the EIA becomes more focused on the schemes which, based on the scale of redevelopment (amount and mix of uses) and location relevant to the site, have more potential to interact in a cumulative manner. Each technical chapter of the ES will be clear on the cumulative schemes that have been considered within the cumulative effects assessment of the topic in question, including a reasoning behind their inclusion. Where cumulative schemes are ‘screened out’ of the cumulative effects assessment, the reasoning for doing so will be presented.
- 2.96** In some instances, schemes that are under construction, where the construction works are significantly progressed or where early phases are occupied, will be factored into the baseline conditions. If relevant, this is clearly set out within each individual topic’s cumulative assessment methodology text.
- 2.97** The schemes identified for inclusion in the cumulative assessment and are listed below (the corresponding reference number presented in **Figure 2.1** is also provided within the below list for ease of reference):
- 1 - 1 Bank End;
 - 2 - 133 Park Street and 105 Sumner Street;
 - 3 - 151-157 Tower Bridge Road;
 - 4 - Southwark Fire Station, 94 Southwark Bridge Road, Grotto Place and Grotto Podiums;
 - 5 - Capital House, 40 – 46 Weston Street;
 - 6 - 185 Park Street;
 - 7 - Guinness Court, Snowfields Street;
 - 8 - 2-4 Melior Place London;
 - 9 - Rich Industrial Estate, Crimscott Street and Willow Walk;
 - 10 - Royal Mint Court;
 - 11 - 47-49 Tanner Street;
 - 12 - Boland house and Counting House, St Thomas street, London SE1;

- 13 - 153-159 Borough High Street;
- 14 - 67-71 Tanner Street, London, SE1 3PL;
- 15 - 130 Fenchurch Street;
- 16 - Site Bounded by King William Street, Cannon Street, Abchurch Lane & Nicholas Lane. Incorporating 10 King William Street, 12 Nicholas Lane, 14 Nicholas Lane, 135-141 Cannon Street, 143-149 Cannon Street & 20 Abchurch Lane;
- 17 - Seal House 1 Swan Lane London EC4R 3TN;
- 18 - 40-44 Bermondsey Street Vinegar Yard Warehouse 9-17 Vinegar Yard And Land Adjacent To 1-7 Snowfields SE1 (Sellar Scheme);
- 19 - New City Court, 4-26 St Thomas Street London SE1 9RS;
- 20 - Kings College London, Land Rear of 89-111 Borough High Street London SE1;
- 21 - Landmark Court, Land bounded by Southwark Street, Redcross Way and Cross Bones Graveyard, London SE1;
- 22 - Becket House 60-68 St Thomas Street London Southwark SE1 3QU (Edge Scheme);
- 23 - 67-71 Tanner Street, London, SE1 3PL (different application at the same site as scheme 16);
- 24 - Land at 19-23 Harper Street, 325 Borough High Street and 1-5 and 7-11 Newington Causeway, London SE1 6AW; and
- 25 – Colechurch House, London Bridge Walk, London, Southwark.

2.98 Figure 2.1 presents the locations of the above identified cumulative schemes in relation to the Proposed Development.

2.99 Further details of the cumulative schemes are located within *ES Volume 3 – Appendix: EIA Methodology – Annex 2*.

2.100 The consideration of cumulative effects is provided in each of the technical chapters of the *ES (ES Volume 1: Chapters 6 to 12)* and *ES Volume 2*.

Effect Interactions

2.101 Effect interactions from the Proposed Development itself on surrounding sensitive receptors during the construction works and also once the Proposed Development is completed are considered within this *ES (ES Chapter 13 - Effects Interactions (Volume 1))*.

2.102 The assessment has focused on key individual receptors and receptor groups considered to be most sensitive to potential interacting effects.

2.103 Only residual effects that are minor, moderate or major in scale have been considered within this assessment, as negligible effects are, by definition, imperceptible in their scale.

2.104 Professional judgement has been used to determine whether the residual effects of the Proposed Development could interact to result in a potential in-combination effect or effect interaction on the receptor in question.

2.105 The scale of an effect interaction is not assigned as part of this assessment; however, whether the effect interaction is considered to be significant or not is identified. For example, when one or more residual significant effects (i.e. effects that are moderate or major in scale) from different EIA topics (i.e. air quality, noise and vibration, HGV traffic or visual impact) coincide on a receptor, the effect interaction has been identified as significant²⁶.

2.106 Further information on the methodology and the results of the effect interactions assessment are presented within the *ES Chapter 13 - Effects Interactions (Volume 1)*.

Key Assumptions and Limitations

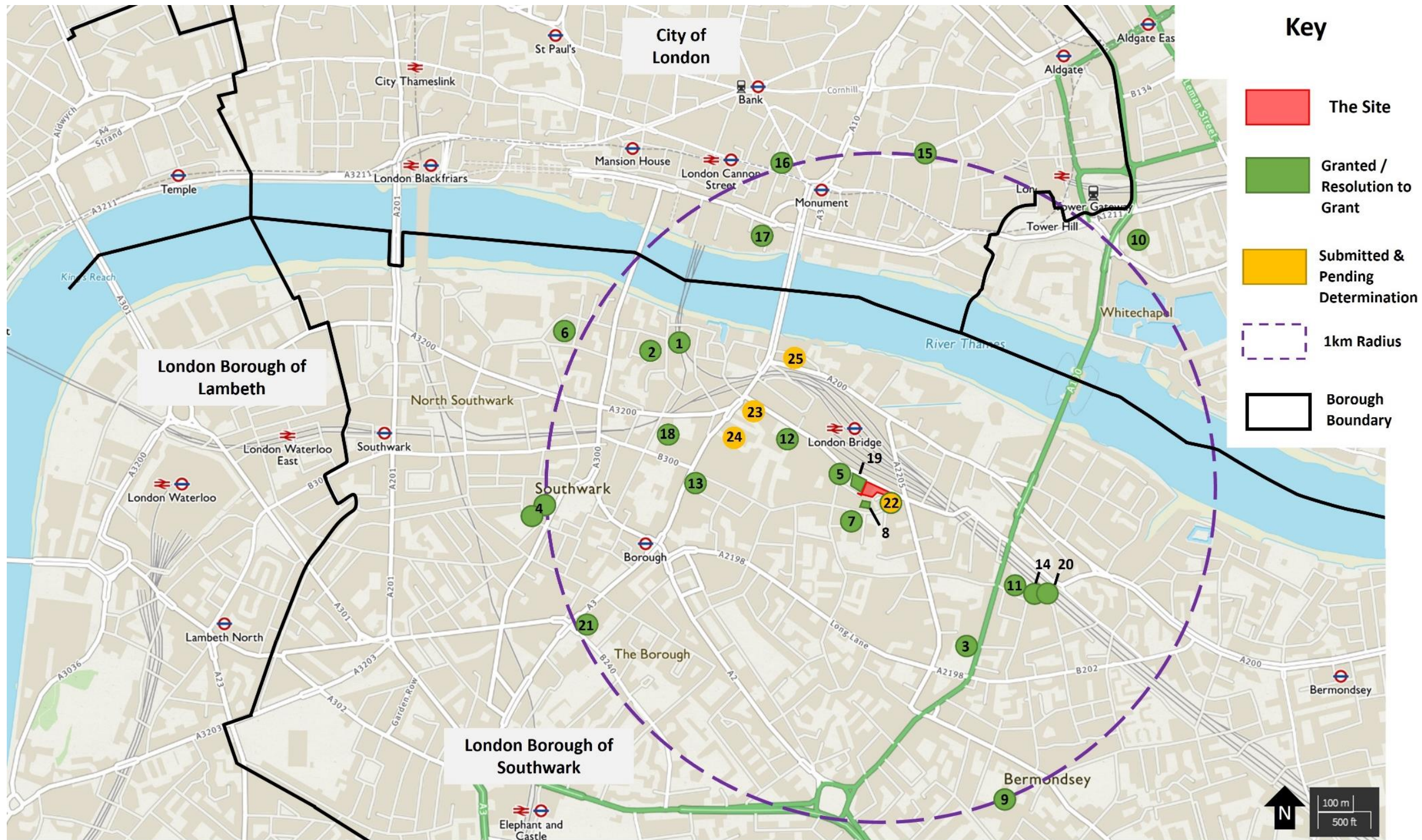
2.107 The principal assumptions that have been made, and any limitations that have been identified, in undertaking the EIA are set out below. Assumptions specifically relevant to each technical topic have been set out in each technical chapter of the ES.

- Baseline conditions have been established from a variety of sources, including historical data and that obtained during the EIA for the 2018 Proposed Development, and are considered to be accurate at the time of writing.
- It is assumed that information received from third parties is accurate, complete and up to date.
- The assessments contained within each of the technical assessment chapters of the ES (*ES Chapters 6 to 12 (Volume 1)*, and *Volume 2*) are based on the assumption that the application drawings and description of development, regulatory regimes and management controls as set out in *ES Chapter - Chapter 4 The Proposed Development and ES Chapter 5 - Demolition and Construction (Volume 1)* are implemented;
- Demolition and construction works across the site would take place substantially in accordance with the programme of works described in *ES Chapter - 5 Demolition and Construction (Volume 1)*;
- The construction materials and construction waste quantities, as well as the construction vehicle numbers used as a basis for the assessments (where relevant) within this ES have been based on the December 2020 scheme which assumed that 13,868m² GEA of floorspace of the Main Building would comprise D1 use (similar to the use class breakdown under Option 1 for the Proposed Development). The Proposed Development is considered to result in no more than a 5% reduction in construction materials and waste quantities and therefore represents a worst-case assessment with regards to construction vehicle numbers. In addition to this, it has been assumed that both Option 1 (D1 use) and Option 2 (B1b use) for the dual use element of the Proposed Development would not materially differ with regards to construction materials and waste and resultant construction vehicle movements.
- Where detailed information has not been available, reasonable assumptions have been made, and have been clearly set out, based on experience of developments of similar type and scale to enable assessment of likely significant effects; and
- Consented or reasonably foreseeable cumulative schemes will be implemented substantially in accordance with information that is publicly available and subject to the same regulatory regimes and good practice management controls as this Proposed Development.

²⁶ The methodology for determining a significant in-combination effect has been defined by the HS2 Phase 2a: West Midlands – Crewe Scoping and Methodology Report (July 2017) and the published HS2 Phase 2a Environmental Statement Volume 1 Introduction and Methodology and

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

Figure 2.1 Map of Cumulative Schemes



ANNEX A

Summary of LBS High Level Review of the 2018 Informal EIA Scoping Report – Topics Scoped Out of the EIA (and further justification taken from Trium’s Response to the LUC review of the 2018 ES and 2019 Supplementary Cumulative Effects Assessment ES Addendum)

Table 2A.1 Summary of Comments from the LBS high level review of the 2018 informal EIA Scoping Report and subsequent Trium responses

Summary of Comment in Review	Reference in the ES / Application Documentation
Requirement for EIA	
Paragraph 1.12 Under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, 'EIA development' means "development which is either Schedule 1 development or Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location." Schedule 1 developments for which EIA is mandatory are generally large scale industry and infrastructure projects. The proposed development does not fall within this category.	Noted.
Paragraph 1.13 Schedule 2, for which EIA may be required, is applicable to developments located in 'sensitive areas' or which meet or exceed applicable thresholds/criteria set out in Schedule 2. The proposed development as described in the submitted SR does not fall within Schedule 2, 10(b) (Infrastructure Projects – Urban Development Projects) of the EIA Regulations as the site area does not exceed the 5 ha threshold, nor does it provide over 1 ha of development that is dwelling/house, nor does it provide over 150 residential units. The site is also not located within a 'sensitive area' as defined by the EIA Regulations. Whilst the proposed development is therefore not 'EIA development', the EIA has been undertaken voluntarily and in accordance with the requirements of the EIA Regulations.	Noted.
EIA and the Scoping Process	
Paragraph 1.15 The SR is accompanied by an appropriate plan (Appendix A – Site Location and Reline Planning Application Boundary) and it is described in the section on 'Site Context and Proposed Development' (see below). Paragraph 11 of the SR refers to Schedule 4 of the EIA Regulations ("Information for inclusion in environmental statements") and paragraph 12 of the SR lists the environmental topics that have been considered in the assessment, and with the potential for significant effects to arise from the proposed development either during construction, operation or demolition.	Noted.
Paragraph 1.16 'Project vulnerability' of the proposed development is also discussed within this section of the SR (as required in Regulation 4(4) and Schedule 4 of the EIA Regulations). This is considered in terms of major accidents and disasters and identifies flood risk and fire risk as relevant to the proposed development. The SR explains that the planning application will be accompanied by a Flood Risk Assessment (FRA) and that fire risk is managed outside of the EIA process through a combination of legislative and industry guidance, including the Construction (Design Management) Regulations (2015). The SR justifies why this topic should be scoped out of detailed assessment, and this is considered an appropriate approach. However, it is suggested that this text would have been better placed in the section of the SR which details 'Topics Where No Likely Significant Effects are Anticipated'.	Noted. The matter of topics scoped out the ES is also addressed within ES Chapter 2 – EIA Methodology (Volume 1) .
Paragraph 1.17 Paragraphs 22 and 23 outline how the alternatives will be outlined in the ES, noting that the ES will summarise the evolution of the proposed development, the alternatives considered, and key modifications made during the design process, with commentary provided on how environmental considerations have influenced the final design. This is considered to be an appropriate approach to the consideration of alternatives, as required by Schedule 4 of the EIA Regulations.	Noted. The consideration of alternatives and design evolution is addressed within ES Chapter 3 – Alternatives and Design Evolution (Volume 1) .

Summary of Comment in Review	Reference in the ES / Application Documentation
Paragraph 1.18 Paragraphs 26 and 27 of the SR respectively assert that the draft SR forms an informal request for an EIA Scoping Opinion from the LBS, and that the Scoping Opinion, along with other consultation, will be appended to the ES.	A copy of the Scoping Report submitted (informally) and the response to the report (LBS Review) is presented within ES Volume 3 - Appendix: EIA Methodology
Site Context and Proposed Development	
Paragraph 1.19 Paragraph 28 of the SR describes 'Site location' and the 'Site Description and Environmental Context' is detailed in paragraphs 29-35. Paragraph 29 states that demolition of temporary Network Rail buildings is currently ongoing and that "vacant possession of the site is to take place at the end of September". It is assumed therefore that this has now been completed however this should be clarified in the ES.	Noted. A description of the site and existing context is described within ES Chapter 1 – Introduction (Volume 1)
Paragraph 1.20 Whilst it is noted that a site location figure is provided as Appendix 1, it is suggested that this should be included in the 'Site location' section, or at least cross-referenced, to allow the reader to fully appreciate the location of the site.	Noted. A description of the site and existing context is described within ES Chapter 1 – Introduction (Volume 1)
Paragraph 1.21 Paragraphs 32 to 34 of the SR identify that the site lies within 2011 Public Transport Accessibility Level (PTAL) rating of 6b (excellent), within flood zone 2 and zone 3 floodplain and within an AQMA. No figures are referred to in relation to these designations, and it is recommended that the ES provides figures showing these designations.	Noted. A description of the site and existing context is described within ES Chapter 1 – Introduction (Volume 1) . Figures showing the designations is presented within the respective technical reports / ES Chapters.
Paragraph 1.22 The SR includes information on 'The Surrounding Area's Environmental Context' which is split into further headings; socio-economic, traffic and transport, air quality, noise and vibration, archaeology, further designations and wind microclimate. Whilst this information is useful, the text forms a brief baseline for each of the headed topics and it is suggested that this information is included within the relevant topic chapters of the SR and ES.	Noted. Appropriate description of the baseline is presented within the respective technical reports / ES Chapters.
Planning Context	
Paragraph 1.24 This section of the SR sets out that the planning statement and the technical assessments of the ES will consider the planning context for the proposed development. The SR notes that the EIA will be undertaken in accordance with national, strategic and local planning policy and guidance and states which relevant documents will be referred to.	Noted. An outline of the legislative / policy context is presented in ES Chapter 2 – EIA Methodology (Volume 1) , and is presented within the respective technical reports / ES Chapters where appropriate.
EIA Process and Methodology	
Paragraph 1.26 Paragraph 82 states that the baseline will be taken as September 2018, following completion of the Network Rail demolition works, and therefore assumed to now be completed as noted above. Demolition of the Network Rail buildings are therefore understood not to form part of the proposed development and paragraph 63 does not mention this, stating, "The Proposed Development includes the demolition of the existing structures on-site including the Vinegar Yard building in the south west portion of the site and the yard in the east portion of the site". To ensure clarity, it is recommended that ES specifies what demolition work is being included and excluded in the assessment.	Noted. Description of the demolition and construction works is presented in ES Chapter 5 – Demolition and Construction (Volume 1) , and this is also carried through into each of the respective technical reports / ES Chapters where appropriate
Paragraph 1.27 Schemes proposed for inclusion in the cumulative assessment are discussed in paragraph 85 of the SR, cross referenced to Appendix B – Cumulative Schemes. The Applicant notes that any changes to the cumulative schemes will be reflected in the baseline and assessment in the ES. It should be noted that the Applicant must agree the schemes for inclusion in the cumulative assessment with the LBS. The approach to the cumulative assessment and assessment of effect interactions set out in paragraphs 118-135 sets out how this will be assessed within the technical chapters and within a separate chapter respectively. The approach is considered appropriate.	The list of cumulative schemes for the purpose of the cumulative assessment was appended to the Scoping Report that was issued out to the LBS in September. Post submission of the Scoping Report in September, further clarification of the schemes for inclusion was sought from LBS in respect of the status of Guinness Court. It was confirmed that consent had been granted for this scheme and should be included as a cumulative scheme for assessment of cumulative effects. The final list of cumulative schemes (taking into account those included as part of the 2019 ES Addendum) is presented in ES Chapter 2 – EIA

Summary of Comment in Review	Reference in the ES / Application Documentation
	Methodology (Volume 1) , and this is also carried through into each of the respective ES Chapters where relevant.
Paragraph 1.29 The SR explains that the ES will provide information on the volumes of construction material to be taken to site and waste volumes, the duration of the demolition and construction phase. These details in turn will be assessed within the technical chapters along with any monitoring programmes.	Description of the demolition and construction works is presented in ES Chapter 5 – Demolition and Construction (Volume 1) , and this is also carried through into each of the respective technical reports / ES Chapters where appropriate
Paragraph 1.30 Paragraph 97 of the SR indicates the inclusion of the construction Code of Construction Practice or Construction Environmental Management Plan (CEMP) (or equivalent) within the ES, which is welcomed.	Description of the demolition and construction works is presented in ES Chapter 5 – Demolition and Construction (Volume 1)
Paragraph 1.31 Paragraphs 98 to 100 of the SR are under the heading ‘Completed Development Impact Assessments’ and set out what will need to be assessed within the EIA once the development is in the operational phase. This section is considered appropriate.	Noted.
Paragraph 1.32 ‘Climate Change’ is the next sub section of the SR and provides a detailed approach of how the climate change assessment will be undertaken. It also states that climate change will be considered throughout the technical chapters of the ES and the level of assessment and methodology will be proportionate to the available evidence base. This approach is considered appropriate.	Noted.
Determining Effect Significance – Terminology and Approach	
Paragraph 1.33 The scope for applying effect significance is set out in paragraphs 136 to 154. The use of standard terminology is proposed, noting that for each topic, “the ES will be clear on which effects are significant and those which are not” and that “this is likely to differ across technical topics”. This standardised, yet flexible approach to assessment, is considered appropriate on the assumption that there is clarity on what effects are considered to be significant in the context of the EIA Regulations.	Noted. An outline of the approach to effect significance is presented in ES Chapter 2 – EIA Methodology (Volume 1) , and is presented within the respective ES Chapters where appropriate. Where the approach for effect significance differs for the respective ES Chapter, this is clearly outlined in the methodology section for that chapter.
Socio-Economics	
Paragraph 1.39 Although the approach to assessing impacts on health is considered acceptable, insufficient information has been presented to justify scoping this topic out in its entirety. It is recommended that further clarity is provided on any potentially sensitive health receptors or relevant pathways that may affect health and wellbeing of existing nearby residents and new workers that will be introduced to the site. It is considered that it is likely to be sufficient to cross-reference other relevant chapters within the EIA where impacts such as noise, air quality, and flood risk are considered further. If this cannot be achieved and appropriately demonstrated, then further assessment of the potential health impacts of the development should be provided in the form of a proportionately scoped EIA chapter, relating to the relevant health impacts of the proposed development.	In order that the scheme’s assessment appropriately addresses emerging policy aspirations, a Rapid Health Impact Assessment (HIA) has been undertaken and can be found in ES Volume 3 – Appendix: Health . In addition, the health effects identified within the HIA have been included within the assessment of effect interactions within this ES (ES Chapter 13 - Effect Interactions (Volume 1)) and health is also considered within the chapter of this ES that concludes on the likely significant effects of the Proposed Development and the overall conclusions of the EIA (ES Chapter 14 - Likely Significant Effects and Conclusions (Volume 1)). Furthermore any mitigation measures relating to health will be reported within ES Chapter 15 – Mitigation and Monitoring Schedule (Volume 1) and summarised within the Non-Technical Summary submitted as a separate document alongside the ES
Water Resources	
Paragraph 1.86 The SR correctly identifies that the proposed development is situated in Flood Zone 3, in an Area Benefiting from Flood Defences. A Flood Risk Assessment (FRA) which will consider potential sources of flooding and impact on and offsite including tidal, pluvial (drainage-related) and groundwater flooding will be produced. This will be submitted with the ES. Climate change related to	A description of the site and existing context is described within ES Chapter 1 – Introduction (Volume 1) . Matters relating to Proposed Development in terms of flooding and water resources is

Summary of Comment in Review	Reference in the ES / Application Documentation
future flood risk will also be considered as part of the FRA and include statements on how the proposed development will build in climate change resilience and resistance with regard to future flood risk. This is considered adequate.	described within ES Chapter 4 – Proposed Development (Volume 1) . A copy of the FRA, which is being presented as part of the package of documents for the planning application as a whole, is also presented within the ES Volume 3: Appendix – Flood Risk and Drainage .
Paragraph 1.88 A Surface Water and Foul Sewage Drainage Strategy will also be submitted with the planning application. The strategy will detail the SuDS envisaged for the proposed development, designed to accommodate a 1:100-year storm and enable the site to achieve runoff rates comparable to those generated at present. However, the applicant should aim to achieve greenfield runoff rates, as advised in statutory and non-statutory guidance, as outlined in the London Plan.	Matters relating to Proposed Development in terms flooding and water resources is described within ES Chapter 4 – Proposed Development (Volume 1) . A copy of the FRA (including description of, and rationale for, the run-off rates designed for), is presented as part of the package of documents for the planning application as a whole, is also presented within the ES Volume 3: Appendix – Flood Risk and Drainage
Paragraph 1.89 The Surface Water and Foul Sewage Drainage Strategy will also identify any existing capacity issues within the foul water drainage network and present strategic options for foul water management at the site. This will be informed via consultation with Thames Water which is considered adequate especially when combined with paragraph 1.90 below.	Matters relating to Proposed Development in terms flooding and water resources is described within ES Chapter 4 – Proposed Development (Volume 1) . A copy of the FRA is presented as part of the package of documents for the planning application as a whole, is also presented within the ES Volume 3 – Appendix: Flood Risk and Drainage
Paragraph 1.90 The SR recognises the potential impact on potable water resources and references that water efficiency measures will be implemented to reduce the proposed development’s impact on the foul drainage / sewer network. The efficacy of the water efficiency measures proposed needs to be considered in the context of overall benefits, and the significance of impact which would result if such measures were not included should also be considered.	Matters relating to Proposed Development in terms flooding and water resources is described within ES Chapter 4 – Proposed Development (Volume 1) . Proposed water efficiency measures are outlined within ES Chapter 15 – Mitigation and Monitoring (Volume 1) . A copy of the FRA is presented as part of the package of documents for the planning application as a whole, is also presented within the ES Volume 3 - Appendix: Flood risk and Drainage
Paragraph 1.91 The SR does not recognise potential impacts on groundwater. This should be considered since the development of a 3-level basement could impede groundwater flows. Moreover, groundwater contamination could occur during the construction phase and therefore these issues should be considered in the ES. Given that the EIA Regulations require consideration of the risk to human health (for example due to accidents or disasters), it is considered that this should include the risk to human health associated with flooding.	The consideration of the potential impact on groundwater and for scoping out of the EIA is discussed within the 2018 Informal EIA Scoping Report and Trium’s Response to the review of the 2018 ES and 2019 Supplementary Cumulative Effects Assessment ES Addendum, both of which are presented in ES Volume 3 – Appendix: EIA Methodology .
Paragraph 1.92 The SR concludes no likely significant effects with respect to flood risk, surface water drainage and foul drainage, including any effects arising during the demolition and construction works. The applicant proposes to summarise the FRA, Surface Water and Foul Sewage Drainage Strategy and mitigating measures into different chapters within the ES. However, this is considered insufficient especially in the context of the 3-level basement development and the noted increase in demands for potable water and potential associated risk to sewer and foul water capacity and flooding. Therefore, a ‘Water Resources and Flood Risk’ chapter should be presented in the ES.	Matters relating to Proposed Development in terms of flooding and water resources is described within ES Chapter 4 – Proposed Development (Volume 1) . Description of the proposed demolition and construction works is presented within ES Chapter 5 – Demolition and Construction (Volume 1) Proposed mitigation measures are outlined within ES Chapter 15 – Mitigation and Monitoring (Volume 1) . A copy of the FRA is presented as part of the package of documents for the planning application as a whole, is also presented within the ES Volume 3 – Appendix: EIA Methodology . Further Trium Response from the 2019 LUC ES Review: The ES Review (para 3.5) states that

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	<p>'...there is no clear justification as to why the information has not been presented within the ES in a specific ES Chapter as per the LBS Review suggestion. The Applicant is requested to provide justification for the exclusion of a 'Water Resources and Flood Risk' chapter within the ES.'</p> <p>It is not clear from the ES review comments the additional level of justification required over and above that presented in the ES.</p> <p>The LBS Review of the Scoping Report comments with regard to the rationale presented for scoping out of Water Resources and highlights in particular the lack of justification in terms of the impact on potable water resources, and the absence of reference to potential impact on groundwater arising from the basement.</p> <p>"The applicant proposes to summarise the FRA, Surface Water and Foul Sewage Drainage Strategy and mitigating measures into different chapters within the ES. However, this is considered insufficient especially in the context of the 3-level basement development and the noted increase in demands for potable water and potential associated risk to sewer and foul water capacity and flooding. Therefore, a 'Water Resources and Flood Risk' chapter should be presented in the ES.'</p> <p>The above matters have been accounted for in the ES, and the justification for scoping out of the EIA are addressed at the following:</p> <p>(a) The impact of the basement – consideration of the potential impact of the basement construction on groundwater is discussed within ES Chapter 2 – EIA Methodology (Volume 1) (from para 2.25 – 'Water Resources – Groundwater'), and is justified by way of the available information (i.e. Basement Impact Assessment (BIA), presented within the ES Appendix) and proposed mitigation measures (i.e. recognised industry best practice), as concluded within para 2.32 with regard to contamination to groundwater, and within para 2.34 with regard to potential for surface water flooding.</p> <p>(b) Demand for potable water – has been accounted for within ES Chapter 4 – Proposed Development (Volume 1) (refer from para 4.100 onwards), with an estimate of water demand and appropriate mitigation by way of network capacity determined by TWUL as part of detailed design, which is a standard process, and water efficiency measures as part of the 'BREEAM Water Credits' (para 4.104).</p> <p>(c) Risk of Sewer and Foul Water Capacity and Flooding - has been accounted for within ES Chapter 4 – Proposed Development (Volume 1)</p>

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	<p>(refer from para 4.105 onwards – Wastewater Generation) which discusses the proposed discharge to the sewer network, including proposed discharge rate, volume and confirmation from TWUL of the available capacity (refer 'Drainage Assessment' provided within the application), as well as future liaison with TWUL about future connection and upgrades to the network.</p>
Ecology	
<p>Paragraph 1.93</p> <p>The Scoping Report concludes that no significant ecological effects are anticipated given the nature of the site and surrounds (being highly developed and disturbed), and it is therefore proposed that ecology is scoped out of the EIA. This is considered to be appropriate.</p>	<p>Noted.</p> <p>A copy of the Ecology PEA is presented within the ES Volume 3 – Appendix: Ecology.</p>
<p>Paragraph 1.94</p> <p>However, the Scoping Report does acknowledge that, although these would unlikely be significant in EIA terms, there is potential for ecological impacts (such as relating to the potential presence of roosting bats) to arise, whilst any development proposals will also present the opportunity to deliver ecological enhancements as is supported in National, London and Southwark planning policy. Ecological survey is therefore proposed, with an ecological report to be submitted with the planning application to detail the findings of surveys completed, impacts and associated mitigation requirements, and enhancement proposals. This is considered an appropriate level of ecological input to support the planning application.</p>	<p>Noted.</p> <p>A copy of the Ecology PEA, presenting the survey undertaken and the results, is presented within the ES Volume 3 – Appendix: Ecology.</p> <p>Matters relating to Proposed Development in terms ecological enhancements is described within ES Chapter 4 – Proposed Development (Volume 1).</p>
Electronic Interference	
<p>Paragraph 1.102</p> <p>The Applicant has proposed to scope out potential effects on electronic interference on the basis that there are to be no adverse effects in relation to radio signals, cable TV reception and mobile phone reception. However, it has been noted that there is the potential for adverse effects relating to both satellite TV reception and Digital Terrestrial TV (DTTV). In the case of the former, there is limited potential for the loss or degradation of signal, although the majority of the structures that falls within the shadow area being of non-residential use. In the case of DTTV there is a slight potential for the adverse impacts, however, standard measures are available to both monitor and mitigate potential impacts and therefore effects are not considered to be significant.</p>	<p>Noted.</p>
<p>Paragraph 1.103</p> <p>While this is considered appropriate, it is recommended that in the ES the Applicant commits to investigating and taking appropriate action if required should any complaints or issues arise which can be directly attributed to the proposed development.</p>	<p>Consistent with the conclusions presented in the Scoping Report (as referenced within paragraph 1.102 of the LBS Review), appropriate measures for investigation and appropriate action should any complaints arise is outlined within ES Chapter 15 – Mitigation and Monitoring (Volume 1).</p>
Waste	
<p>Paragraph 1.104</p> <p>The scope for waste is set out in paragraphs 412 to 419 of the SR. The EIA will be accompanied by a Construction Environment Management Plan (CEMP) while specific mitigation proposals to be implemented throughout the construction and demolition phases are to be outlined as part of ES Volume 1, Chapter 14: Mitigation and Monitoring Schedule. An operational waste and recycling management strategy will be prepared to address waste management measures to be enforced during the operational phase. Measures relating to the proposed development once complete and occupied, including a summary of the waste strategy, are to be presented in ES Volume 1, Chapter 3: The Proposed Development.</p>	<p>The section referenced within the Scoping Report (paragraphs 412 to 419) does not propose that the ES will be accompanied by a CEMP. An outline of the CEMP to be prepared is presented in ES Chapter 5 – Demolition and Construction (Volume 1) and mitigation measures relating to waste (i.e. reducing, management of, etc) is referred in each of the respective ES Chapters (where relevant) and outlined within ES Chapter 15 – Mitigation and Monitoring (Volume 1).</p>
<p>Paragraph 1.105</p> <p>While the scoping out of this chapter is considered acceptable, the relevant chapters or appendices should include information on the estimated total arisings of demolition and construction waste, the proportion of waste to be reused and whether this re-used waste will require processing. The sources</p>	<p>Estimates of the quantities / waste arising during the period of demolition and construction works is presented in ES Chapter 5 – Demolition and Construction (Volume 1).</p>

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<p>and disposal methods and locations of materials and waste should be identified, as should approaches that will be implemented to maximise resource efficiency. The EIA should also include a commitment to the preparation of a Site Waste Management Plan (SWMP).</p>	<p>An outline of the CEMP to be prepared, and the information to be provided, is presented in ES Chapter 5 – Demolition and Construction (Volume 1) – this includes reference to ‘Waste Management’ and for the provision of SWMP as part of good practice.</p> <p>Mitigation measures relating to waste (i.e. reducing, management of, etc) is referred in each of the respective ES Chapters (where relevant) and outlined within ES Chapter 15 – Mitigation and Monitoring (Volume 1).</p>