



THE GOODSYARD

Scoping Opinion Review Request

March 2019



ballymore.



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1.1 INTRODUCTION AND BACKGROUND

- 1.1.1 Bishopsgate Goods Yard Regeneration Limited (hereafter referred to as 'the Applicant') is a joint venture between Hammerson and Ballymore with the objective of bringing forward the redevelopment of land formerly known as Bishopsgate Goods Yard in Shoreditch, in London ('the site').
- 1.1.2 The Applicant is seeking to obtain a part outline and part detailed (full) planning permission (forming a 'hybrid' planning application) for a comprehensive mixed-use redevelopment ('the Proposed Development') partly located within the London Borough of Hackney (LBH) and partly within the London Borough of Tower Hamlets (LBTH).
- 1.1.3 Identical planning applications for the Proposed Development were originally submitted on the 21st July 2014 to both LBH and LBTH for determination.
- 1.1.4 Following further consultation with LBH and LBTH amendments to the planning applications were submitted in August 2015.
- 1.1.5 On 15th September 2015 the former Mayor received a request to become the local planning authority for the purpose of determining the two planning applications at the Bishopsgate Goods Yard site. On 23rd September 2015, having considered a report on the case, the former Mayor notified LBH and LBTH that he would act as the local planning authority for the purposes of determining the planning applications. The Stage 3 report was published on 8th April 2016 and a public representation hearing was due to be held in April 2016 for the former Mayor to determine the applications. However, following a request from the Applicant to defer the representation hearing in order to work with GLA officers to satisfactorily address the concerns raised, the former Mayor decided to defer the representation hearing for that purpose.
- 1.1.6 Since that time, the Applicant has been working with the officers at the GLA, LBTH and LBH with regard to the submission of amendments to the current planning applications for determination by the current Mayor.
- 1.1.7 The Applicant now intends to submit amendments to the Proposed Development (hereafter referred to as the Proposed Amendments).
- 1.1.8 An Environmental Statement (ES) prepared in line with the 2011 EIA Regulations¹ was submitted in support of the 2015 planning applications. As part

of this process a Scoping Report was issued to LBTH and LBH in December 2013 and a subsequent Scoping Opinion was issued jointly by the LBTH (Ref: PA/14/107) and LBH (Ref: 2014/0249) in 2014 both of which are appended to this report. Since that Scoping Opinion was issued, the 2017 EIA Regulations² came into force. The 2017 EIA Regulations require the consideration of additional environmental topics.

- 1.1.9 The GLA considers that the Proposed Amendments fall under the 2011 EIA Regulations and they have invited the Applicant to request a review of the 2014 Scoping Opinion.
- 1.1.10 The Applicant has felt it prudent to request a review of the 2014 Scoping Opinion due to the intervening time period, the potential for change to the identified baselines and to the applicable policy and guidance the assessments were previously based upon.
- 1.1.11 Therefore, the following report has been produced to outline the Proposed Amendments and the proposed approach to the 2019 ES Addendum.
- 1.1.12 In line with the GLA's requirements this report has been prepared pursuant to the 2011 EIA Regulations.
- 1.1.13 The Applicant, in the interests of best practice and robustness has prepared this Scoping Review Report to incorporate the requirements of the 2017 EIA Regulations which go over and above those in the 2011 EIA Regulations, all references to the 'EIA Regulations' throughout the document will refer to the 2011 EIA Regulations, any references to the 2017 EIA Regulations will be expressed as such.
- 1.1.14 This Scoping Opinion Review will be submitted to the GLA as the now determining authority.
- 1.1.15 In accordance with the GLA's letter (Ref: D&P/1200c&d/PR) dated the 21st December 2018 we have provided this request to review the 2014 Scoping Opinion and have identified the revisions and additions that we consider are required to address the likely significant effects.
- 1.1.16 To provide further assistance Table 1.1.1 identifies the sections within the 2013 Scoping Report which are now considered to be out of date and have been subsequently revised and / or replaced by the stated sections within this 2019 Scoping Report Review. The corresponding sections within the 2014 Scoping Opinion to be reviewed have also been listed.

¹ The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (SI 2011/1824).

² The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/571).

Table 1.1.1: Revised and Replaced Sections from the 2013 Scoping Report within in this 2019 Scoping Review

2013 Scoping Report (relevant section)	2014 Scoping Opinion (relevant section)	Revisions or Additions Proposed	Location in the 2019 Scoping Report Review
Section 2 Overview of Proposed Development (p5).	The Proposed Development: Section 2, paragraphs 2.1 – 2.3.	Revised description of the development the 'Proposed Amendments'.	The Proposed Amendments: Section 1.2.9 – 1.2.11 (p5).
Section 4 Consultation (p10).	Consultation: Section 2.4 – 2.6.	Outlining further consultation undertaken and community engagement.	Further Consultation and Engagement: Section 1.4 (p9).
Section 5 Key legislation and planning policy (p12).	No comment in original Scoping Opinion	Additional section included on changes to planning policy context.	Changes to Policy Context: Section 1.3: (p7).
Section 6.1 Structure of the ES (p14).	Review of Approach to EIA: Section 3.1 – 3.5.	Revised description of the approach to the ES Addendum	Proposed Structure of the ES Addendum: Section 1.22: (p57).
Section 6.2 EIA Methodology (p15).	Review of Section 6.2 Methodology, Section 4.3 – 4.11 & 4.24 -4.34.	Revised approach to the ES addendum methodology.	ES Addendum Approach and Methodology: Section 1.5: (p10).
Section 6.6 Phasing (p17).	Review of Section on Demolition and Construction 6.11, Section 4.25 – 4.33.	Revision to the temporal scope of the assessments and demolition and construction.	Temporal Scope: Section 1.5.11 – 1.5.16 (p11).
Section 6.7 Limited Development Scenario (p17).	No comment in original Scoping Opinion.	Revised to include the Proposed Amendments.	The Limited Development Scenario: Section 1.2.18 -1.2.24 (p8).
Table 1 List of Cumulative Schemes (p19).	Impact Interactions and Cumulative Impact Assessment: Section 4.12 – 4.20.	Revised list of cumulative schemes to be assessed and Figure outlining their location.	Committed and Submitted Schemes: Table 1.5.4 (p15-20) & Figure 1.5.1 (p22).
Section 6.9 Climate Change (p26).	Review of Section 6.9: Consideration of Climate Change within the EIA, Section 4.21 -4.23.	Revised approach to the assessment of climate change within the ES Addendum.	Climate Change Mitigation and Adaptation: Section 1.20 (p51).
Section 6.12 Waste and Recycling (p28).	Review of Section 6.12: Waste and Recycling, Section 4.35 – 4.45.	Updated approach to the assessment of Waste and recycling within the ES Addendum.	Waste and Recycling: Section 1.7 (p24).
Section 6.13 Socio Economics (p29).	Review of Section 6.13: Socio Economics, Section 4.46 – 4.55.	Updated approach to the assessment of Socio Economics within the ES Addendum.	Socio Economics, Section 1.8 (p25 - 26).
Section 6.14 Ground Conditions (p31).	Review of Section 6.14: Ground Conditions, Section 4.62 – 4.66.	Updated approach to the assessment of Ground Conditions within the ES Addendum.	Ground Conditions: Section 1.9 (p27).

2013 Scoping Report (relevant section)	2014 Scoping Opinion (relevant section)	Revisions or Additions Proposed	Location in the 2019 Scoping Report Review
Section 6.15 Traffic and Transport (p32).	Review of 6.15: Traffic and Transport, Section 4.67 – 4.77.	Updated approach to the assessment of Traffic and Transport within the ES Addendum.	Traffic and Transport: Section 1.10 (p28).
Section 6.16 Wind Microclimate (p37).	Review of Section 6.16: Wind Microclimate, Section 4.78 – 4.83.	Updated approach to the assessment of Wind Microclimate within the ES Addendum.	Wind Microclimate: Section 1.11 (p31).
Section 6.17 Daylight, Sunlight, Overshadowing, Solare Glare and Light Pollution (p38).	Review of Section 6.17: Daylight, Sunlight, Overshadowing, Solar Glare, and Light Pollution, Section 4.84 – 4.97.	Updated approach to the assessment of Daylight, Sunlight, Overshadowing, Solar Glare, and Light Pollution within the ES Addendum.	Daylight, Sunlight, Overshadowing, Solare Glare and Light Pollution: Section 1.12 (p32-33).
Section 6.18 Air Quality (p45).	Review of Section 6.18: Air Quality, Section 4.98 – 4.106.	Updated approach to the assessment of Air Quality within the ES Addendum.	Air Quality: Section 1.13 (p34 - 36).
Section 6.19 Noise and Vibration (p47).	Review of Section 6.19: Noise and Vibration, Section 4.107 – 4.115.	Updated approach to the assessment of Noise and Vibration within the ES Addendum.	Noise and Vibration: Section 1.14 (p37).
Section 6.20 Water Resources and Flood Risk (p53).	Review of Section 6.20: Water Resources, Drainage and Flood risk, Section 4.116 – 4.138.	Updated approach to the assessment of Water Resources and Flood Risk within the ES Addendum.	Water Resources and Flood Risk: Section 1.15 (p38).
Section 6.22 Built Heritage (p55).	Review of Section 6.22: Built Heritage: Section 4.155 – 4.166.	Updated approach to the assessment of Built Heritage within the ES Addendum.	Built Heritage: Section 1.18 (p48- 49).
Section 6.23 Ecology (p56).	Review of Section 6.23: Ecology, Section 4.167 – 4.178.	Updated approach to the assessment of Ecology within the ES Addendum.	Ecology: Section 6.23 (p50).
Section 6.25 Townscape, Conservation and Visual Impact Assessment (p59).	Review of Section 6.24: TVIA, Section 4.183 – 4.209.	Updated approach, list of views for assessment and updated maps.	Townscape Visual Impact Assessment: Section 1.17 (p42 - 47).
Section 7 Environmental Topics to be Scoped Out of The ES (p66).	Section 5: Assessments to be Scoped out of the EIA, Section 5.1 – 5.7.	Revision to the sections to be scoped out of the EIA.	Non-Significant Topics: Section 1.21, (p54 -56).
Section 8 Proposed Structure of the ES (p67).	Section 6: Proposed Structure of the Environmental Statement, Section 6.1 – 6.2.	Revised structure for the ES Addendum.	Proposed Structure of the ES Addendum: Section 1.22 (p57).

1.2 PROPOSED APPROACH

STRUCTURE OF THE SCOPING REVIEW

1.2.1 The structure to this report is as follows:

- Introduction and background;
- The 2014 Scoping Report and Scoping Opinion;
- The Proposed Amendments;
- The Proposed Approach to the 2019 ES Addendum;
- Updates to Policy Context;
- Further Consultation and Engagement;
- EIA approach and methodology;
- Proposed Scope of the assessments;
- Proposed non-significant topics;
- Revised structure of the 2019 ES Addendum; and
- Summary of the proposed EIA Scope.

THE 2014 SCOPING REPORT AND SCOPING OPINION

1.2.2 In December 2013 URS produced a Scoping Report for the Proposed Development (see Appendix 1). The proposed quantum of development was as follows:

- provision of up to 180,000 m² Gross External Area (GEA) comprising of 6 residential buildings (equating to up to 1420 units);
- an office complex providing up to 60,000 m² (GEA);
- retail provision throughout the scheme of up to 20,000 m² (GEA); and
- substantial public realm, including a new raised park.

1.2.3 It was proposed to divide the site into 12 development plots (named A – L).

1.2.4 In January 2014 a Scoping Opinion was issued jointly by the LBTH (Ref: PA/14/107) and LBH (Ref: 2014/0249) which is appended to this report, which provided advice on the proposed scope of the EIA based on the outline of development provided above.

1.2.5 The Scoping Report identified the following topics for assessment:

- Waste and Recycling;
- Socio-economics;
- Ground Conditions;
- Traffic and Transport;

- Wind Microclimate;
- Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution;
- Air Quality;
- Noise and Vibration;
- Water Resources, Drainage and Flood Risk;
- Archaeology;
- Built Heritage;
- Ecology; and
- TV and Radio (Electronic) Interference.

1.2.6 The scope of each of the proposed ES Chapters was reviewed in Chapter 4 of the 2014 Scoping Opinion, which was in broad agreement with the proposed scope advised.

1.2.7 The following assessment topics were suggested as unlikely to give rise to significant effects and were 'scoped out' of the EIA:

- Health and Wellbeing; and
- Aviation.

1.2.8 LBTH and LBH were broadly in agreement with this approach.

THE PROPOSED AMENDMENTS

1.2.9 The Proposed Amendments are intended to comprise of the:

- provision of up to 130,000 m² Gross External Area (GEA) of Commercial (B1 use);
- provision of up to 20,000 m² GEA of Retail (A1 to A5 use);
- provision of up to 500 residential homes (C1 use);
- provision of up to 150 hotel room use;
- other assorted uses of D1; and
- up to 1ha of public realm.

1.2.10 The Proposed Amendments will be divided into 9 buildings / development plots, with the Building / Plot 7 and Building / Plot 2 covered in detail within the applications. Building / Plot 7 will consist of ground level retail built within the Grade II listed arches. The arches form two east-west routes through the scheme, including London Road, and create additional public realm. This detailed application also comprises the listed Forecourt Wall, Oriel and, located to the west of the scheme, adjacent to Shoreditch High Street, the location of a new proposed entrance to the site.

1.2.11 Of the 8 other buildings / development plots, several are mixed use, with retail units on the ground or podium floors and residential or office space above.

Buildings 1 to 3 are proposed to contain the majority of the office space within the Proposed Amendments. Building / Plot 8 are proposed to provide a mix of hotel and residential use.

PROPOSED APPROACH TO THE 2019 ES ADDENDUM

- 1.2.12 Following on from the Stage 3 report produced by the GLA in April 2016 changes were made to the Proposed Development by the Applicant to satisfactorily address the concerns raised which has resulted in a number of amendments to the Proposed Development.
- 1.2.13 The heights of the buildings across the site have been reduced to take into account concerns raised with regards to Townscape and Daylight and Sunlight. The plot references have changed though the buildings are broadly located in the same positions, and whilst the range of the core uses has not changed (residential, business, retail, community uses and public open space) and a hotel use has now been included.
- 1.2.14 The 2015 ES was written based upon a 2013/14 baseline, with the appropriate guidance and policy of that time applied. Therefore, to ensure accurate representation of the current conditions the baseline conditions for a number of the technical assessment would now require updating, and the assessments revised to reflect the changes in guidance and policy.
- 1.2.15 It is important that the ES Addendum is presented in a way so that it can be easily understood by the public and all consultees and not complicated by continual cross referencing back to the previous scheme. Therefore, for the Proposed Amendments, this ES Addendum will provide a complete revision of the relevant assessment chapters so that they can be kept “clean” to avoid complication and confusion.
- 1.2.16 In addition to this each chapter will also include a qualitative assessment that compares the environmental effects of the 2019 Proposed Amendments with the 2015 Proposed Development. The effects will also be considered with and without mitigation applied and concludes whether the effects are better or worse than reported in the 2015 scheme.
- 1.2.17 Further explanation to the approach to the assessments and the methodology to be used is described in Section 1.5 and the individual topic assessments.

THE LIMITED DEVELOPMENT SCENARIO

- 1.2.18 The Proposed Development site straddles the borough boundary between LBH and LBTH, therefore the 2015 planning application included two identical planning applications (one to each borough). Both of these applications were ‘called in’ by the Mayor for determination in 2015. Whilst it is accepted now that determination for the whole site lies with the GLA, it may still be possible (subject

to permission being granted) that the Applicant decides to build out only the parts of the Proposed Amendments that lay wholly within the borough of LBTH. In the event where this situation occurs it is necessary that the ES Addendum has adequately assessed the ‘likely significant’ effects.

- 1.2.19 Therefore, as this situation is still applicable regarding the Proposed Amendments, the ES Addendum will also present an additional assessment scenario. The scenario will include the development that will wholly occur within the LBTH (hereafter referred to as the ‘Limited Development Scenario (LDS)’) and will encompass the development plots (which do not straddle the boundary) that can be brought forward independently of the LBH elements of the scheme. This will include development Plots 4 - 10.
- 1.2.20 An assessment will be provided of the demolition and construction effects, the effects once the LDS is complete and operational and the cumulative effects of the LDS with other surrounding development schemes. An alternative scenario considering the development plots in LBH is not being considered as these buildings straddle the boundary and therefore it would not be possible to build them out independently.
- 1.2.21 The LDS will be presented as a stand alone Appendix to ES Addendum. A summary chapter will be provided within the main body of the ES Addendum which will summarise the effects associated with this possible development scenario coming forward independently. The summary of effects will state where the residual effects / mitigation measures are the same or different as the residual effects reported for the main assessment of the Proposed Amendments, with relevant justification. This will also include a description of the demolition and construction programme relevant construction phases and the condensed time period of construction that would be applied to the LDS. This summary chapter will explicitly refer to an appended report which will provide the details of the assessment undertaken and the main body of the LDS assessment.
- 1.2.22 The baseline for the Limited Development Scenario as for the main development scenario would consist of the current conditions on site (2018/19). The assessments when considering the LBH section of the site will also assume the current (2018/19) conditions on the site.
- 1.2.23 The appended report will only present the difference in the LDS assessments, the mitigation measures, the cumulative effects and the associated justification in comparison with the main assessment of the Proposed Amendments.
- 1.2.24 The associated ES Addendum documents namely the Townscape and Visual Impact Assessment (TVIA) and the Transport Assessment (TA) will also assess the LDS, these assessments will also be appended to the ES in a similar format. A summary of this information will be provided within the summary chapter with further detail to be included within the appended report.

1.3 CHANGES TO POLICY CONTEXT

PLANNING CONTEXT

- 1.3.1 In line with the EIA will consider legislation and relevant national and local planning policy guidance as summarised below.

NATIONAL PLANNING POLICY

- 1.3.2 The ES Addendum will have regard to the National Planning Policy Framework (NPPF)³, which 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.
- 1.3.3 The NPPF should be read alongside the National Planning Practice Guidance (NPPG), which aims to make planning guidance more accessible, and to ensure that the guidance is kept up to date.

REGIONAL POLICY AND GUIDANCE

- 1.3.4 The ES Addendum will have regard to the following key regional strategic planning documents. Any additional regional planning policy and guidance documents considered relevant to the technical assessment which are covered by the EIA will also be considered:
- The London Plan⁴; and
 - Supplementary Planning Guidance (SPG)⁵, which details further guidance on policies in the London Plan that can't be addressed in sufficient detail in the plan itself.
- 1.3.5 A draft London Plan was published by the Mayor for consultation in December 2017. The consultation period ended on Friday 2nd March. Greater London Authority officers are currently registering all representations received and

³ DCLG (March 2012) National Planning and Policy Framework

⁴ GLA (March 2016) The London Plan: The Spatial Development Strategy for London consolidate with alterations since 2011

⁵ GLA: Supplementary Planning Guidance

⁶ London Borough of Tower Hamlets (2010) Core Strategy

⁷ London Borough of Tower Hamlets (2013) Managing Development Document

⁸ London Borough of Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing the Benefits

preparing a report which will summarise the main issues.

- 1.3.6 The current 2016 Plan (The London Plan consolidated with alterations since 2011) is still the adopted Development Plan, but the Draft London Plan is a material consideration in the determination of planning decisions. The planning weight applied to the draft London Plan will increase as the documents progresses through to adoption.
- 1.3.7 The Examination in Public (EiP) is scheduled to begin on the 15th January 2019 with final adoption scheduled for the winter of 2019/20.

LOCAL PLANNING POLICY

Tower Hamlets

- 1.3.8 Key local planning policy documents make up LBTHs Development Plan that will be considered throughout preparation of the ES Addendum.
- 1.3.9 LBTHs Local Plan consists of the Core Strategy and Managing Development Document. Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in the Borough.
- 1.3.10 The Core Strategy⁶ is the principal document of the suite of local planning policy documents as it sets LBTHs spatial strategy to 2025, setting out broad areas and principles, and where, how and when development should be delivered across the Borough.
- 1.3.11 The Managing Development Document⁷ provides detailed policies, which build on the Core Strategy. Through the development management policies It helps to manage development across the Borough and provide strategic guidance for key development sites within site allocations.
- 1.3.12 LBTH is currently at an advanced stage of drafting the Local Plan 2031⁸, which outlines the proposed vision, objectives and planning policies and will be the key strategic document to guide and manage development in the Borough up to 2031. Once adopted, it will supersede the existing policies set out in the Core Strategy (2010) and Managing Development Document (2013). The final period of consultation on the content of the plan was undertaken between October and

November 2017. The Local Plan was submitted to the Secretary of State in February 2018 and the Examination in Public was held in October 2018.

- 1.3.13 Given the current status of the emerging draft Local Plan 2031 (i.e. examination in public completed), it is considered to have significant planning weight as it is in an advanced stage of the plan making process (and therefore its replacement of the existing Core Strategy and Managing Development Document). As such, the ES Addendum will have regard to the policies contained within the draft Local Plan 2031 as relevant.

Hackney

- 1.3.14 Key local planning policy documents make up LBHs Development Plan that will be considered throughout preparation of the ES Addendum.
- 1.3.15 LBHs Local Plan consists of the Core Strategy, the Development Management Local Plan and the Site Allocations Local Plan. Together these documents provide the spatial planning framework for Hackney to deliver its Sustainable Community Strategy.
- 1.3.16 The Core Strategy⁹, adopted in 2010, is the primary document of the Local Plan, detailing strategic planning policies for how and where development should take place within the borough up to 2025.
- 1.3.17 The Development Management Local Plan¹⁰ (DMLP), adopted in July 2015, works in conjunction with the Core Strategy to support the on-going regeneration of the borough by providing detailed policies to be used as the main policy tool in assessment and determination of planning applications.
- 1.3.18 The Site Allocation Local Plan¹¹ (SALP), adopted in July 2016, identifies a series of strategic locations across the borough of Hackney capable of delivering significant amounts of development or development that supports specific objectives. Site-specific policy is given for each site identified, allocating them particular uses.
- 1.3.19 LBH is currently preparing the Local Plan 2033¹² (LP33), which outlines the proposed vision, objectives and planning policies and will be the key strategic document to guide and manage development in the Borough up to 2033. Once

adopted, it will combine and replace the existing plans within the Core Strategy, DMLP and SALP.

- 1.3.20 The Proposed Submission version is the subject of consultation from 19th November 2018 until 7th January 2019. Following consultation, the Plan will be submitted to the Government for examination in 2019, prior to final adoption in 2019.

OTHER POLICY AND GUIDANCE CONSIDERATIONS

- 1.3.21 There are a number of supporting policy and guidance documents that are topic specific and will be considered on a topic by topic basis within the ES Addendum.

⁹ London Borough of Hackney (2010) Core Strategy

¹⁰ London Borough of Hackney (2015) Development Management Local Plan

¹¹ London Borough of Hackney (2016) Site Allocation Local Plan

¹² London Borough of Hackney (2017) Draft Local Plan 2033 (LP33), Public Consultation (Reg 18).

1.4 FURTHER CONSULTATION AND ENGAGEMENT

- 1.4.1 The process of consultation is important to the development of a comprehensive and balanced ES. Views of the interested and affected parties serve to focus the environmental studies and to identify specific issues that require further investigation. Consultation is an ongoing process as part of the design development and has continued on the Proposed Amendments to the scheme.
- 1.4.2 Information and views are being sought from a range of statutory and non-statutory bodies through public consultation and the intention is for consultees to be involved in the evolution of the design and assessment of environmental impacts.
- 1.4.3 Key consultees are considered to include, but are not limited to:
- LBTH (including departments such as Highways and Planning);
 - LBH (including departments such as Highways and Planning);
 - Greater London Authority (GLA);
 - Environment Agency (EA);
 - Historic England (HE);
 - Transport for London (TfL);
 - Metropolitan Police;
 - National Grid (NG) and other Statutory Utility providers (including Thames Water Utilities Limited (TWUL), UK Power Networks (UKPN) and BT;
 - Local residents and local community groups (to be agreed with the Planning Authority); and
 - Important neighbouring occupiers comprised of local business and industry.
- 1.4.4 Initial outreach began in 2011, followed by extensive consultation between 2013-2015, which engaged with over 1,500 local people during the process. This included a wide range of public events, regular newsletters, a steering group made up of local residents and community liaison group. The consultation recorded the areas of most importance locally, setting community aspirations and tracking where the proposals had and hadn't met these, and why.
- 1.4.5 Consultation on the Proposed Amendments has continued with a series of mini and main exhibitions and a series of workshops to discuss the key aspects of the proposals from the 8th to the 15th November 2018. Key feedback from this process helped inform and shape the Proposed Amendments.
- 1.4.6 It is anticipated that a further public consultation event will be held prior to submission to introduce the refined proposal to the community.

1.5 ES ADDENDUM APPROACH AND METHODOLOGY

- 1.5.1 The general approach to assessment will remain as presented for the Proposed Development whereby a baseline is established for each topic. Receptors and resources will be identified, and their sensitivity classified. The potential impacts of the Proposed Amendments on these receptors and resources will be assessed, for the construction and operation. Subsequent mitigation of impacts will be considered, along with the identification of likely cumulative and residual effects.
- 1.5.2 The process that the EIA will take is shown in **Figure 1.5.1** below:

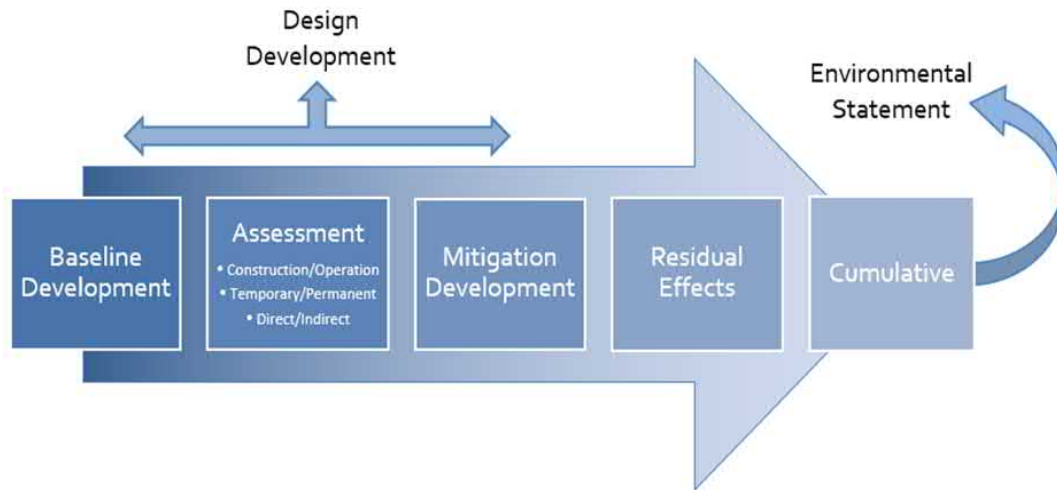


Fig 1.5.1: EIA Assessment Process

BASELINE DEVELOPMENT

- 1.5.3 As mentioned above the ES Addendum will primarily describe environmental impacts in terms of the extent of likely change to the baseline environment. The baseline represents the environmental conditions of a site at the time of the assessment. The baseline will be updated for each assessment topic to reflect the existing 2018/19 conditions on the site.

SPATIAL SCOPE

- 1.5.4 The redline boundary remains unchanged from the boundary presented in the 2015 Proposed Development.
- 1.5.5 Assessment study areas will vary by topic areas, according to the baseline information and the nature of likely impacts these may differ from those assessed in the 2015 ES due to the Proposed Amendments.
- 1.5.6 As in the 2015 Proposed Development the scale and layout of the outline components will be presented as scale and layout parameters (both in terms of a maximum and minimum building envelope).
- 1.5.7 Where appropriate the ES Addendum will test the maximum and/ or minimum extent of the building envelope or illustrative scheme so as to ensure that the environmental impacts sought for outline approval are assessed by the EIA. The maximum extent of the building envelope potentially leads to, for example, increased view obstruction, increased wind speeds, greater overshadowing or daylight / sunlight reductions, a reduction in the amount of available open space between the buildings than the minimum parameters. This may not be the case for all assessment areas. For example, when assessing the socio-economic matters such as employment generation, the minimum parameters will be assessed.
- 1.5.8 Although it is unlikely that there will be a significant variation between the maximum and minimum building envelope to assess how the likely impacts would differ between the maximum and minimum extent, a qualitative assessment using professional judgement will be undertaken. For example, where the worst case scenario is the maximum envelope, the qualitative assessment would assess how the impacts would change if the minimum envelope were applied. This assessment will be provided where relevant within each of the aforementioned technical chapters.
- 1.5.9 In terms of the amount of development, the Application will state an upper and lower limit and maximum GEA in respect of commercial floorspace, retail floorspace, hotel number of rooms, residential homes and non-residential institutions within the outline component. For the detailed element of the Proposed Amendments, a defined amount of commercial and retail floorspace will be presented.
- 1.5.10 The technical aspects of the EIA that apply the amount of development / floorspace for the purposes of the assessment of impacts are as follows:
 - Socio-Economics specifically in relation to employment creation, population and child yield estimates and so demand for social infrastructure (e.g. healthcare, school places, open space, etc.) and additional local spending; and
 - Traffic and Transport specifically in relation to trip generation and modal split (and so indirectly, Air Quality and Noise and Vibration in relation to the assessment of road traffic noise and air quality impacts).

TEMPORAL SCOPE

- 1.5.11 The ES Addendum will assess the environmental impacts of the Proposed Amendments during both construction and operation. The assessment will compare current and future baseline conditions (as appropriate) to those conditions expected with the construction and operation of the Proposed Amendments. The assessment will assume that the construction will start in Q4 2020, subject to securing planning consent.
- 1.5.12 The ES Addendum will consider the totality of the Proposed Amendments from construction through to operation, using the following assessment scenarios:
- existing baseline;
 - future baseline (without Proposed Amendments);
 - assessment of peak construction effects; and
 - assessment of operational effects (all construction complete, the Proposed Amendments fully occupied and operational).
- 1.5.13 It is anticipated that the construction period for the Proposed Amendments will take place in a phased manner likely be reduced from the previously reported 16 years to approximately 12 years and undertaken over 7 distinct phases rather than 5 presented and assessed in the 2015 Proposed Development.
- 1.5.14 The construction information will be broadly similar to that presented previously although this will be updated to reflect any changes in the proposed construction methodology and techniques. The ES Addendum will include an updated chapter describing the proposed construction methodology and timescales.
- 1.5.15 A framework Code of Construction Practice (CoCP) setting out construction related mitigation measures will also be prepared, including a commitment to the Considerate Contractors Scheme.
- 1.5.16 The assessment of peak construction effects will identify likely significant effects during the peak construction phase. This will assess a worst-case scenario and therefore be a conservative assessment of any interim effects, therefore no time-slices or interim construction assessments are considered necessary for most topics. However, depending on the construction timescales for the outline elements it may be necessary to assess an interim scenario to assess the temporary effects upon on-site receptors.

ASSESSMENT OF EFFECTS AND DEFINING SIGNIFICANCE

Prediction of Impacts

- 1.5.17 Once impacts have been identified, prediction methods will be used to identify the magnitude and nature of changes to the environment resulting from the

project, compared to the situation without the project (i.e. the baseline conditions). The relative significance of these changes will then be defined using thresholds and criteria, as appropriate.

- 1.5.18 There are a number of methods available for predicting the effects of the Proposed Amendments, some of which are qualitative and quantitative. Quantitative methods predict measurable changes resulting from a development, and hence rely on the ability to measure and or model baseline conditions accurately, for example the concentration of air pollutants. In comparison, qualitative techniques rely on expert judgement. In these circumstances, a clear distinction will be made between matters of fact and professional judgement.

Determining Significance

- 1.5.19 The changes generated by a development project may result in outcomes which are considered to be beneficial or adverse, and in some cases may be considered to be neutral. Examples would include: new scheme-related noise or air pollution, changes in lighting levels, loss of habitat or top soil, new planting and habitat re-provision, changes to the townscape, loss of surface permeability, waste production, etc.
- 1.5.20 Examples of receptors / resources that might be affected by such changes include: people (residents, passers-by, workers etc.), designated sites (Sites of Specific Scientific Interest, Conservation Areas, groundwater protection zones etc.) and non- designated environmental resources of value.
- 1.5.21 Effects come about as the result of imposing changes on receptors / resources. The physical extent of effects (in terms of the geographical area affects, or the size of the human population affected, or the spatial extent of any protected species or habitats affected) should all be taken into account when assessing the importance of likely changes along with duration, frequency and reversibility.
- 1.5.22 Step 1 of the process of assessing the significance of an effect (i.e. the imposition of a change onto a receptor / resource) is to identify all relevant combinations of change and receptor / resource which may arise as a consequence of implementing the Proposed Amendments. This is most easily and clearly done by dividing the assessment by topic area and then further subdividing within topic areas the source and type of change (distinguishing between direct, indirect and secondary) and the receptor(s) affected by this.
- 1.5.23 Step 2 is to use professional judgement and/or appropriate best practice guidance (and taking into account specific statutory or non-statutory values and objectives as may be applicable, for example, in relation to air quality or water quality threshold values) to identify:
- the sensitivity of the receptors / resources concerned;
 - the strength (and the geographical scale at which the change is identified),

- duration and frequency of the likely changes; and
- to score these components of the effect under consideration.

1.5.24 The duration of an effect can be assessed to be:

- temporary (e.g. demolition and construction phase); and
- permanent (e.g. once the Proposed Amendments are completed and operational).

1.5.25 Where appropriate and greater precision is helpful the following terms can also be used:

- short term (<5 years);
- medium term (5-10 years); and
- long term (>10 years).

1.5.26 Some changes will affect different receptors / resources to different degrees, and some receptors / resources may be affected by a range of potential changes (to which they may well exhibit different sensitivities). Significance must therefore be judged in the context of a specific combination of change and receptor / resource.

1.5.27 Generic criteria for determining the value / sensitivity of a receptor or resource based on its relative importance and its ability to accommodate change and / or recover from impacts is provided in **Table 1.5.1**.

1.5.28 Step 3 of the process of assessing the significance of an effect is to describe and document the outcome of Steps 1 and 2, and to judge the significance of each potential effect determined by the interaction of value / sensitivity and magnitude, whereby the effects can be beneficial, adverse or neutral.

1.5.29 Generic criteria for determining the magnitude of an impact based on the strength of change the geographical scale at which it is identified, the duration, frequency and reversibility of the change is provided in **Table 1.5.2** above.

1.5.30 A generic Effect Significance Matrix is set out in **Table 1.5.3** to assist in this judgement of significance, whereby it is generally considered that any effect greater than “minor” is considered a significant effect.

1.5.31 However in all cases the author should exercise professional judgement and take account of all relevant topic specific standards, guidance and threshold in assessing the significance of an effect.

1.5.32 Step 4 is to record those effects which are to be treated as significant, and to identify those effects which, while not in the end deemed to be significant, may well need to be considered further in the context of cumulative impacts.

Table 1.5.1: Methodology for Determining Value / Sensitivity

Sensitivity	Examples of Receptor / Resource
High	The receptor/resource has little ability to absorb change without fundamentally altering its present character, or is of international or national importance.
Moderate	The receptor/resource has moderate capacity to absorb change without significantly altering its present character, or is of high importance.
Low	The receptor/resource is tolerant of change without detriment to its character, is of low or local importance.

Table 1.5.2: Methodology for Determining Impact Magnitude

Magnitude of Impact	Criteria for Assessing Impact
Major	Total loss or major/substantial alteration to key elements/features of the baseline (pre-development) conditions such that the post-development character/composition/attributes will be fundamentally changed.
Moderate	Loss or alteration to one or more key elements/features of the baseline conditions such that post-development character/composition/attributes of the baseline will be materially changed.
Minor	A minor shift away from baseline conditions. Change arising from the loss/alteration will be discernible/detectable but not material. The underlying character/composition/attributes of the baseline condition will be similar to the pre-development circumstances/situation.

1.5.33 The matrix presented in **Table 1.5.3** is widely accepted and used within the EIA industry. The magnitude and significance criteria have been provided as a guide for technical specialists to assess effect significance. Generally, a significant effect in EIA terms is one which is moderate beneficial / adverse or above. An effect which is negligible or minor beneficial / adverse is considered to be not significant in EIA terms.

1.5.34 Where discipline specific methodology has been applied that differs from the

generic criteria above, this has been clearly explained within the given chapter under the heading of Assessment Methodology and Significance Criteria.

Table 1.5.3: Effect Significant Matrix

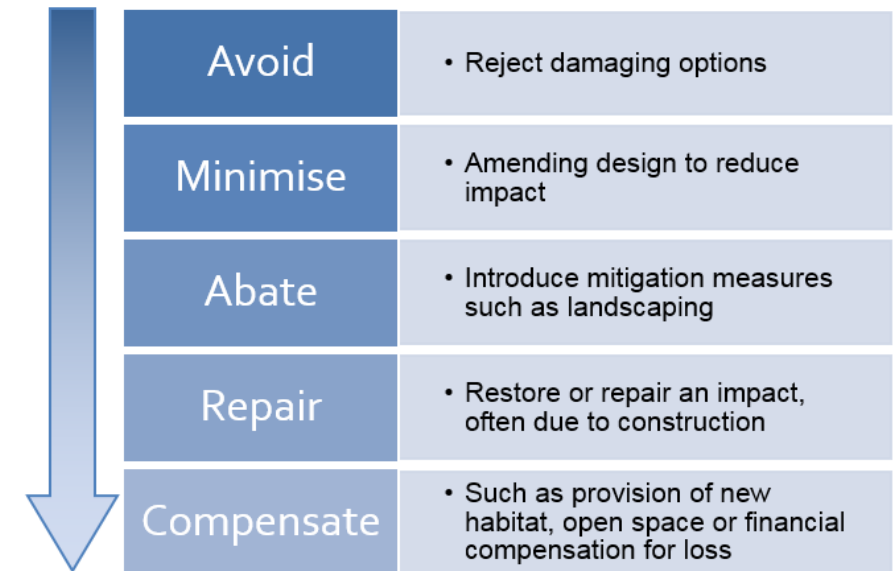
Magnitude	Sensitivity		
	High	Moderate	Low
Major	Major Adverse/Beneficial	Major - Moderate Adverse/Beneficial	Moderate - Minor Adverse/Beneficial
Moderate	Major - Moderate Adverse/Beneficial	Moderate – Minor Adverse/Beneficial	Minor Adverse/Beneficial
Minor	Moderate - Minor Adverse/Beneficial	Minor Adverse/Beneficial	Minor - Negligible
Negligible	Negligible	Negligible	Negligible

MITIGATION DEVELOPMENT

- 1.5.35 During the EIA, there will be an on-going design process, looking at ways to best mitigate any likely environmental effects through modifications to the design of the Proposed Amendments. This will constitute embedded design mitigation and where this has occurred it will be identified within the relevant topic chapters within the ES Addendum.
- 1.5.36 Further assessment mitigation measures may be introduced where adverse environmental impacts remain following the culmination of the design process and, in these instances, further mitigation will be proposed where feasible within the relevant technical chapters. A practical example of this (for illustrative purposes only) could be that all dwellings are designed to fulfil certain requirements in terms of noise insulation (embedded design mitigation); however, the noise assessment may identify, post outputs from modelling, that a specific dwelling requires enhanced glazing specification (additional assessment mitigation).
- 1.5.37 Proposals for mitigation will follow the following hierarchy set out in **Figure 1.5.2**. Where beneficial effects and or opportunities for enhancement and betterment are identified, measures to maximise these will also be proposed.
- 1.5.38 Design mitigation will include compliance with legislation, industry good practice, Best Practicable Measure (BPM) and construction environmental management

procedures identified in the draft Code of Construction of Practice (CoCP). Design features that have been adapted to reduce or prevent impacts will be described.

Fig 1.5.1: Mitigation Hierarchy



RESIDUAL EFFECTS

- 1.5.39 The residual effects will be assessed using the same system as described above taking account of any assessment mitigation proposals. Generally, based on the described classification and professional judgement, effects considered to be moderate or major will be deemed significant, and those considered minor, or negligible, will be deemed not significant.
- 1.5.40 Residual effects will be presented within each individual topic chapter and summarised in the concluding chapter of the ES Addendum.

COMPARISON OF RESIDUAL EFFECTS

- 1.5.41 The residual effects identified for the Proposed Amendments will be qualitatively compared back to the 2015 Proposed Development, with and without mitigation to demonstrate where the scheme has given rise to better or worse effects.

CUMULATIVE EFFECTS

- 1.5.42 The assessment of cumulative effects will be undertaken as outlined in the 2013 Scoping Report and will include “a description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative...effects.”
- 1.5.43 Two types of cumulative effects will be considered in the assessment. These include Type 1, intra-project effects (or effect interactions) which are the combined effects of individual topic impacts on a particular sensitive receptor, and Type 2, inter- project effects which are the combined effects of different development projects, alongside the Proposed Amendments.
- 1.5.44 Type 1 cumulative effects will be addressed in a separate ES chapter. Type 2 cumulative effects will be assessed in each individual topic chapter. Cumulative effects during both the construction and operational phases of the Proposed Amendments will be assessed.
- 1.5.45 The EIA will consider Type 2 cumulative effects from schemes of an appropriate scale and spatial extent in the context of the development.
- 1.5.46 An updated planning search has been undertaken, and the developments as set out in **Table 1.5.4**, have been identified as ‘major development’ likely to generate significant inter project effects. **Figure 1.5.3** shows the location of these schemes as well as the 1 km search boundary applied.
- 1.5.47 GLA, LBTH and LBH officers are invited to identify any additional committed or consented major development officers believe are likely to require consideration within the ES Addendum as a result of likely significant inter-project environmental effects.

DEMOLITION AND CONSTRUCTION

- 1.5.48 As presented in the 2015 ES the ES Addendum will include a chapter describing the proposed construction methodology, the likely phasing of the Proposed Amendments and the proposed construction timescales. A draft CoCP will also be provided to accompany the applications, setting out construction related mitigation measures that will be prepared.

CONSIDERATION OF ALTERNATIVES

- 1.5.49 As presented in the 2015 ES the ES Addendum will include consideration of the main alternatives considered during the design process, such as the location and types of land uses and layouts. The rationale for the selection of the preferred option, taking account of the effects of the Proposed Amendments on the environment, will also be included within the ES Addendum.

Table 1.5.4: Committed and Submitted Schemes

Map Reference	Scheme Name and Reference Number	Nature of Scheme	Status
1 (LBTH)	Land within former Truman's Brewery site, (LPA Ref. PA/12/00090)	Demolition of the existing store building, sub-station, workshops and boundary wall to Buxton Street and Spital Street up to the Cooperage Building and erection of a 3 storey high data centre with basement accommodation including provision of Use Class B1.	Application permitted (12 April 2012). Permission has lapsed without implementation.
2 (LBTH)	London Fruit Exchange Brushfield Street And Multi Storey Car Park Whites Row, Brushfield Street, London (LPA ref: PA/16/03266)	Demolition of Whites Row Multi-Storey Car Park, 99-101 Commercial Street (The Bank), 54 Brushfield Street (The Gun Public House), and partial demolition of the London Fruit & Wool Exchange behind the retained Brushfield Street facade and the erection of a six storey building with a basement, for business, employment and retail use (Use Classes B1/A1/A2/A3 & A4) with landscaping and associated works, together with a new pavilion building for retail accommodation (Use Class A1).	Application permitted (11 October 2017)
3 (LBH)	Art Otel - east of Old Street roundabout at the junction of Old Street, Rivington Street and Great Eastern Street. (LPA Ref: 2009/2405)	Demolition of existing buildings on the site and construction of a part eighteen storey and part six storey building for use as a Hotel, plus retail, bar and restaurant, art gallery and art cinema; Offices; and roof top bar and restaurant; together with ancillary hard and soft landscaping, revised vehicular access/egress, 48 cycle spaces and refuse/service arrangements.	Granted (7 January 2011)
4 (LBTH)	Black Lion House, 45 Whitechapel Road (LPA Ref. PA/13/02162)	Change of use, refurbishment and extension to existing office building (Use Class B1), to provide 11, 537m ² / 217 bed hotel (Use Class C1) including an additional 7th, 8th and 9th storey extension. Erection of a single storey office building.	Application permitted (26 November 2013)
5 (LBTH)	Aldgate Place (LPA Ref. PA/13/00218)	Demolition of existing buildings and creation of a mixed use development, comprising three towers of 22, 25 and 26 storeys and a series of lower buildings ranging from 6 to 9 storeys. Provision of 463 private and affordable residential dwellings (use class C3), together with office (use class B1), hotel (use class C1), retail including restaurants, cafes and drinking establishments (use classes A1-A4) and leisure (use class D2) uses; creation of new pedestrianized street, public open spaces, children's play spaces and associated car and cycle parking together with associated highways works and landscaping.	Application permitted (18 October 2013)
6 (CoL)	Bevis Marks House, 24 Bevis Marks (LPA Ref: 14/00433/FULMAJ)	The demolition of the existing buildings and construction of 2 basement levels and ground plus 16 storey building (89m AOD) comprising office (Class B1) use [35,658sq.m GEA] and retail (Class A1/A3) uses [758sq.m GEA] with associated servicing and plant facilities. [Total 36,416sq.m GEA].	Application validated (17 July 2014)
7 (LBTH)	Fakruddin Street and Pedley Street	Redevelopment of site (including land at Fakruddin Street) to provide a car free development of 63 units (14x 1 bed flats, 28x 2 bed flats, 12x 3 bed and 9x 4 bed	Application permitted (13 December 2012)

Map Reference	Scheme Name and Reference Number	Nature of Scheme	Status
	(LPA Ref. PA/12/02228)	house) for 100% affordable housing within three blocks measuring between two and seven storeys including associated shared and private amenity space, landscaping, disabled parking, cycle parking, child play area and community centre (273m2) including community building (90m2).	
8 (LBTH)	11-31 Toynbee Street and 67-69 Commercial Street, London (LPA Ref: PA/16/02878/A1)	Demolition of the existing buildings on site and redevelopment to provide a part three, part four, part five storey building with basement, comprising a flexible workspace area on ground floor and basement (Use Class B1); a fitness tuition facility in basement (Use Class D2); office space on ground floor (Use Class B1); a larger commercial unit on ground floor for flexible A1/A2/A3/A5 use; two smaller commercial units on ground floor for flexible A1/A2/A3/A5/B1 use; an internal commercial unit on ground floor for flexible A1/A2/A3/A5 use; 23 residential units (Use Class C3) ; creation of roof terrace, amenity space and bin store; landscaping works.	Application permitted (18 October 2017)
9 (LBTH)	Site At 3-11 Goulston Street And 4-6 And 16-22 Middlesex Street (LPA Ref: PA/18/01544)	Demolition of existing substation and construction of a part 8/16/20/24 storey building with basement, including 988 rooms of purpose built student accommodation (sui generis); 488sqm of incubator floorspace and 2,919sqm of affordable workspace (Use Class B1) at ground, first, second and third floor levels; together with cycle parking; landscaping and public realm improvements.	Decision pending
10 (CoL)	9-13 Aldgate High Street (LPA Ref: 13/00590/FULMAJ)	Demolition of the existing office building (Class B1) and redevelopment to provide a new hotel (Class C1) comprising 275 bedrooms and ancillary services within a 13 storey building (9734.33 m2 GEA).	Application permitted (8 April 2014)
11 (LBTH)	Site at 2-6 Commercial Street, 98 and 101-105 Whitechapel High Street, carpark to the rear of 95-97 Whitechapel High Street (known as Spreddeagle Yard) and Canon Barnett Primary School (LPA Ref: PA/18/02615/A1)	Demolition of 98 - 105 Whitechapel High Street, 2 - 6 Commercial Street and the western annex of the Canon Barnett Primary School; retention of the façade of 102 - 105 Whitechapel High Street; to facilitate a redevelopment to provide buildings ranging from ground plus 3 ?19 storeys, comprising office floorspace (Class B1), retail floorspace (Class A1-A5), educational floorspace (Class D1); relocation and expansion of the existing school playground; associated car and cycle parking, hard and soft landscaping and other associated works.	Registered
13 (LBH)	Principal Tower (Principal Place / Bishops Place) (LPA Ref: 2016/2044)	Minor material amendment to planning permission 2015/0279 dated 13/05/2015, for the following development: Demolition of the rear of 233 Shoreditch High Street, perimeter walls, viaduct structure across Plough Yard and all other structures on the site; erection of a decking structure and development comprising the erection of one part 10, part 16 storey building to provide 76,530sqm B1 floor space together with 1885sqm at ground floor level of A1-A4 floor space (Building 1); one 50-storey block	Under Construction

Map Reference	Scheme Name and Reference Number	Nature of Scheme	Status
		<p>comprising 30,486sqm of private residential floorspace together with 242sqm at ground floor level of A1-A4 floor space (Building 2); Affordable housing component of one 14 storey block comprising 3,615sqm of affordable residential floorspace plus 116sqm of Class A1-A4 floor space at ground floor (Building 3); and one 6 storey block comprising 1,709sqm of affordable residential floorspace (Building 4); one single storey block comprising of 263sqm of flexible space Class A1- A4/D1/D2/B1 (Building 5), one single kiosk comprising of 100sqm of Class A1-A4, parking spaces; open space; all other associated works. The amendment is to vary conditions 2 (approved plans) and 38 (residential mix) in order to increase the number of units within Building 2 from 273 to 301 as well as condition 10 (retail opening hours) to extend the hours of retail use to 0700 to 2300 Mon to Wed 0700 to 2400 Thurs to Sat and 0700 to 2230 on Sun and public holidays. Other amendments include the addition of a D2 use to the flexible use proposed in Building 1, increased cycle provision, alterations to waste storage at buildings 2 and 3, reduction in retail floorspace in Building 3, and window alterations in Building 2.</p>	
14 (LBH)	The Stage (Plough Yard) (LPA Ref: 2015/3453)	<p>Demolition of existing buildings and the excavation and exhibition of the remains of the Curtain Theatre (D1 Use). Excavation of a basement structure containing flexible commercial floorspace, plant, car & motorbike parking & cycle storage. Erection of 4 buildings around an area of new landscaped open space to comprise: a 40-storey residential tower including ancillary communal facilities at 1st floor & flexible retail/restaurant/bar floorspace at ground floor; a 9 storey office building with flexible commercial floorspace & flexible retail/restaurant/bar floorspace at ground & 1st floor; a 13 storey office building with flexible commercial floorspace, flexible retail/restaurant/bar floorspace & a loading bay at ground floor; & 2 storey education & events building. Erection of a 4 storey temporary structure to provide flexible retail/restaurant/bar floorspace units & office units. Associated works including demolition, alteration, extension & change of use to the railway viaduct to provide flexible retail/restaurant/bar floorspace within the refurbished arches, open space & a two storey extension to the top of the viaduct to provide retail/restaurant/bar floorspace. New open space to provide a link between Great Eastern Street, Hewett Street & Plough Yard. Associated works including the protection and treatment of buildings to be retained, temporary removal & reinstatement of 3 Grade II listed bollards on Curtain Road, surfaces, landscaping, lighting & cycle storage. Redevelopment comprises a total of 385 residential (C3) units (264 x 1 bed units; 84 x 2 bed units; 23 x 3 bed units; 14 x 4 bed units); approx 26,060sqm (GIA) of B1 office floorspace; 4,621sqm (GIA) of flexible A1 - A4 retail/restaurant/bar floorspace; 817sqm (GIA) of flexible (A1 - A4 / B1) commercial floorspace; 1,125sqm (GIA) of D1 exhibition space; 870sqm (GIA) of sui generis education & events space; 2,520sqm (GIA) of sui generis shared back of house uses, 115 car parking spaces & 4 delivery bays</p>	Under Construction or Complete & Unsold

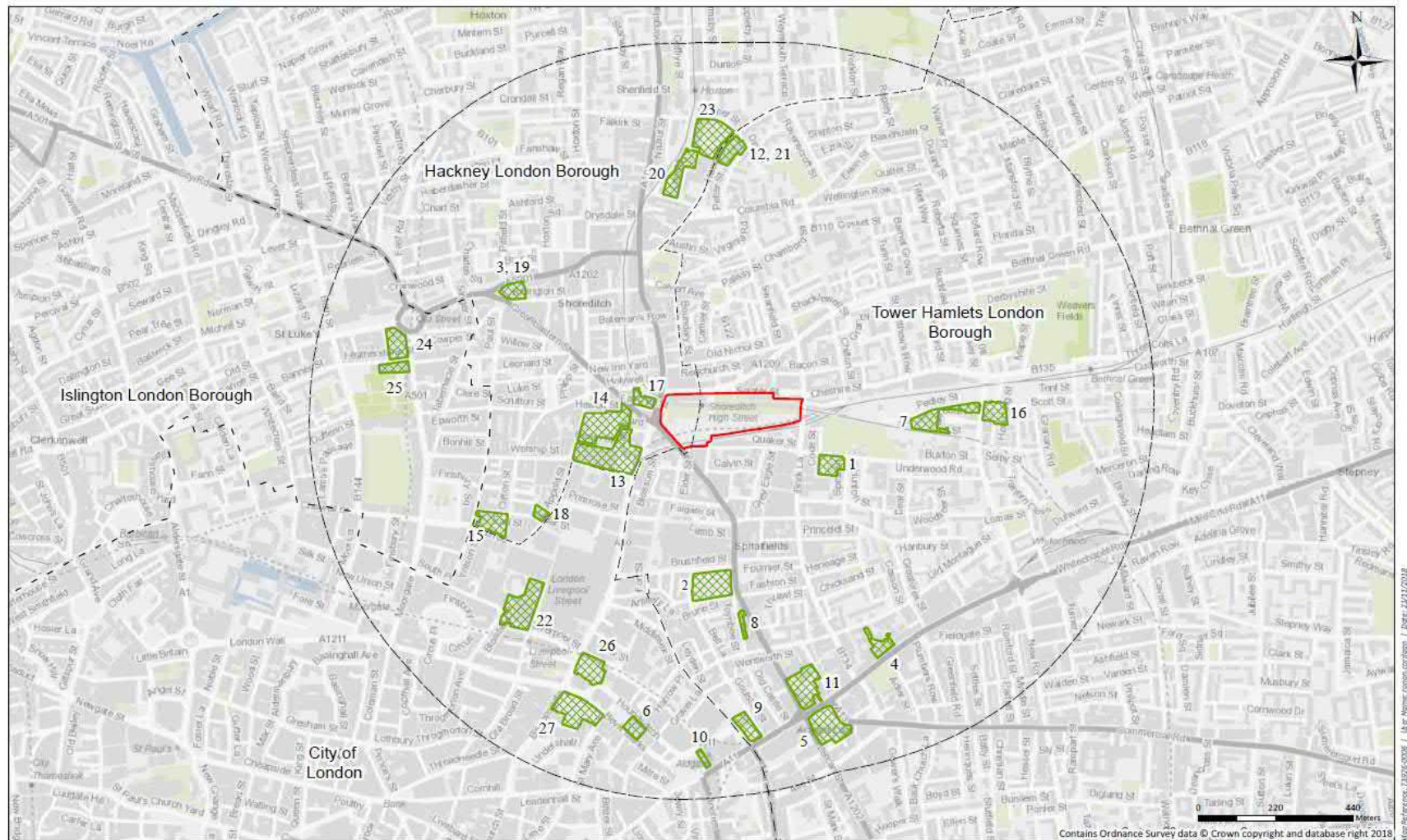
Map Reference	Scheme Name and Reference Number	Nature of Scheme	Status
15 (LBH)	5-29 Sun Street 8-16 Earl Street & 54 Wilson Street (LPA Ref: 2015/0877)	Demolition of 17-29 Sun Street, 1-17 Crown Place and 8-16 Earl Street (excluding front façade) and construction within the eastern part of the site of a 3 level basement plus lower ground, ground level and mezzanine and part 6, part 10 storey podium building above ground level/mezzanine level with two towers of 29 and 33 storeys above ground/mezzanine level. The new building provides flexible office/retail floorspace at lower ground level (Class B1/A1/A3/A4), retail at ground and mezzanine level (Class A1, A3 and A4), office (Class B1) at lower ground, ground, mezzanine and levels 1-6 and 247 residential units (Class C3) at levels 7 - 33. Refurbishment of 5-15 Sun Street with roof extension and three storey rear extension (plus basement) to provide a 32 bed hotel (Class c1), Class A3 restaurant, Sui Generis clubhouse and hotel courtyard. Refurbishment and extension of 54 Wilson Street to provide a 7 storey (plus basement) office building (Class B1) with flexible office/retail (Class b1/A1/A3) at ground floor level. Provision of vehicle access, public courtyard, amenity space, car parking, with associated plant and works.	Under Construction or Complete & Unsold
16 (LBTH)	120 Vallance Road 2-4 Hemming Street (LPA Ref: PA/15/01231)	Demolition of existing buildings at 120 Vallance Road and 2-4 Hemming Street and erection of four buildings to provide 1,331sqm (GEA) of commercial space, 152 residential units and new public realm, landscaped amenity space, cycle parking and all associated works	Under Construction or Complete & Unsold
17 (LBH)	201-207 Shoreditch High Street (LPA Ref: 2015/2403)	Demolition of existing buildings and structures and erection of a part 7, part 10 and part 30 storey building (plus 2 levels of basement) comprising office (Class B1) and hotel (Class C1) accommodation with ancillary retail, restaurant, event space, lounge and amenity areas; roof terraces; refuse and recycling facilities; cycle parking; servicing and plant; and landscaping.	Permission Granted
18 (LBH)	13-14 Appold Street (LPA Ref: 2015/1685)	Demolition of existing building and erection of a 45 storey mixed use office (Use Class B1) and business hotel (Use Class C1) with ancillary retail / restaurant use (A1/A3) at ground and lower ground and ancillary servicing and plant. The application is accompanied by an Environmental Statement pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.	Permission Granted – Not Started
19 (LBH)	84-86 Great Eastern Street (LPA Ref: 2015/1834)	Demolition of existing buildings on the site and construction of a part twenty two storey (Block A: Ground plus twenty one floors) and part five/ part six storey (Block B: Ground plus four/ five floors) building for use as a 346 room hotel (22,174sqm GIA use Class C1 including health and leisure facilities); flexible uses including retail, bar and restaurant, art gallery and art cinema (3,324sqm GIA Use Class A1/ A3/ A4/ D1 and D2); private members club/ hotel use (781 sqm GIA sui generis/ Class C1); Offices (6,734 sqm GIA use Class B1); and public bar and restaurant (662 sqm GIA Use Class A3/ A4); together with ancillary hard and soft landscaping,	Permission Granted – Not Started

Map Reference	Scheme Name and Reference Number	Nature of Scheme	Status
		revised vehicular access/ egress, 130 cycle spaces, 6 disabled vehicular spaces, refuse/ service arrangements, and all other works associated with the development	
20 (LBH)	1-13 Long Street (LPA Ref: 2012/2013)	Erection of a new part 4, part 5, part 8-storey building to provide for 237 rooms of student accommodation and associated communal areas; erection of a new 10-storey building and two-storey extensions to the existing buildings at 1-3 Long Street and 5-9 Long Street to create 6-storey buildings along with associated refurbishment works to provide for 73 residential units; conversion of ground floor of 5-9 Long Street to provide for 816 sq m (GEA) of Class B1 use floorspace; construction of a landscaped podium above car parking area at ground floor level (40 car spaces); the provision of 255 cycle spaces and access and landscape works.	Under Construction
21 (LBTH)	114-150 Hackney Road (LPA Ref: PA/17/00250)	Mixed use redevelopment of site including part demolition, part retention, part extension of existing buildings alongside erection of complete new buildings ranging in height from four storeys to six storeys above a shared basement, to house a maximum of 9 residential units (Class C3), 12,600 sqm (GEA) of employment floorspace (Class B1), 1,340 sqm (GEA) of flexible office and retail floorspace at ground floor level (falling within Use Classes B1/A1-A4) and provision of of Public House (Class A4), along with associated landscaping and public realm improvements, cycle parking provision, plant and storage.	Permission Granted – Not started
22 (CoL)	100 Liverpool Street & 8 - 12 Broadgate (LPA Ref: 15/01387/FULEIA)	Refurbishment and extension of existing buildings including retention of buildings structural frame and construction of new facade and the provision of three additional floors and rooftop plant to provide office (B1) use; retail (A1), flexible use for either retail (A1/A2/A3) or leisure (D2) uses at lower ground, ground and first floor levels; and flexible office (B1) /restaurant (A3) use at 9th floor level; provision of car and cycle parking; hard and soft landscaping; alterations to facilities associated with the bus station; and the provision of other works ancillary to the main building. (Total Floorspace 69,029sq.m (GEA) (Minor amendments to previously approved application 14/01285/FULEIA).	Under Construction
23 (LBH)	97-137 Hackney Road (LPA Ref: 2015/3455)	Demolition of all existing buildings and construction of three replacement buildings ranging in height from ground plus four storeys to ground plus eight storeys, above shared basement. Proposed mix of uses to include a maximum of 184 residential units (Class C3), 13,334 sqm (GIA) of employment floorspace (Use Class B1), and 4,243 sqm (GIA) of flexible commercial/retail space at basement and ground floor levels (falling within Use Classes A1-A4, and B1) which can comprise of no more than 1,500 sqm (GIA) of A1 floorspace, no more than 500 sqm (GIA) of A2 floorspace, no more than 1,500 sqm (GIA) of A3 floorspace, no more than 1,000 sqm (GIA) of A4 floorspace, and no more than 1,400 sqm (GIA) of B1 floorspace, along with associated landscaping and public realm improvements, parking	Under Construction

Map Reference	Scheme Name and Reference Number	Nature of Scheme	Status
		provision, plant and storage, and other works incidental to the proposed development.	
24 (LBI)	70-100 City Road (LPA Ref: P101833)	Development of the site involving demolition of the existing structures except for 70-74 City Road and 36-37 Featherstone Street; the change of use of the first to third floors of 36-37 Featherstone Street from Class B1 office to Class C3 residential (3 units); the construction of four new buildings, Building A up to 90.09m high, Building B up to 40.39m high, Building D, up to 40.37m high and Building F up to 31.5m high to provide 32,625m ² of Class B1 floor space, 728m ² of mixed uses for Class A1/A2/A3/A4, creation of 6 residential units, alterations to an existing service access on Mallow Street, provision of new publicly accessible hard landscaped space.	Under Construction
25 (LBI)	Speedfix House and Monmouth House, 19 – 23 Featherstone Street (LPA Ref: P2015/3136/FUL)	Demolition of existing buildings and redevelopment of the site to provide a building of part 10, part 11 storeys fronting City Road and five storeys along Featherstone Street to provide 13,393sq.m. of office space (B1) including affordable workspace; 404sq.m. of retail (A1); together with ancillary hard and soft landscaping, revised vehicular access/egress, 302 cycle spaces, one disabled vehicular space, refuse/service arrangements and all other works associated with the development. This application may affect the character and appearance of a conservation area and the setting of a listed building. Town and Country Planning (Listed Building and Conservation Areas) Act 1990 (as amended).	Permission Granted – Not Started
26 (CoL)	150 Bishopsgate (LPA Ref 17/00623/FULL)	Application under Section 73 of the Town and Country Planning Act 1990 to vary Conditions 33 and 54 of planning permission 14/001151/FULL dated 02.02.2017 to enable minor material amendments to the approved scheme for alterations to 142-150 Bishopsgate and 1-17 Devonshire Row (odd numbers), relocation of 1 Stone House Court and redevelopment of Stone House (128-140 Bishopsgate and 77-84 Houndsditch), Staple Hall (87-90 Houndsditch) and 1, 3 and 5 Stone House Court, to provide a mixed use development comprising a luxury hotel, residential accommodation, retail uses (A1 and A3), hard and soft landscaping works including provision of a new public plaza, alterations to vehicular and pedestrian access and highways layout together with ancillary plant, servicing and associated works. The minor material amendments include amendments to elevational detailing, internal layout including mix of residential units, reconstruction of Devonshire Row southern spine wall, alterations to the public plaza and public realm and creation of a ballroom entrance pavilion at the south-west corner of the plaza. (56,526sq.m gea)	Granted
27 (CoL)	(100 Bishopsgate) 61 St Mary Axe, 80-86 Bishopsgate, 88-90 Bishopsgate, 12-20	Amendments under section 73 to planning permission 11/00332/FULEIA dated 23 November 2011 for the erection of three buildings to comprise office (B1), retail (A1-A4), Library (D1) and Livery Hall (Sui Generis) uses with associated public space and landscaping, disabled car parking, cycle parking, servicing and plant.	Granted

Map Reference	Scheme Name and Reference Number	Nature of Scheme	Status
	Camomile Street, 15-16 St Helen's Place And 33- 35 St Mary Axe (North Elevation Only) (LPA Ref: 12/00129/FULL)		
28 (LBTH)	Silwex House, Quaker street (LPA Ref: PA/16/00392/A1)	Demolition of the roof and part side elevations, the retention and restoration of the southern and northern elevations and the construction of a two storey roof extension to provide a new hotel (Use Class C1) development comprising approximately 260 bedrooms over basement, ground and four upper floors with ancillary cafe space and servicing on the ground floor, associated plant in the basement and roof, improvements to the front pavement and associated works.	Granted 2016
29 (LBH)	Shoreditch Village (183- 187 Shoreditch High Street, bounded by Holywell Lane, New Inn Yard and rail viaduct) (LPA Ref: 2017/0596)	Demolition of 17 Anning Street, rear of 186 Shoreditch High Street and rear of 187 Shoreditch High Street. Redevelopment to provide 3 mixed-use buildings ranging from 2 to 8 storeys (plus basement), comprising office (B1) use, flexible retail (A1/A3) use and flexible office/retail (B1/A1/A3) use. Works include external alterations and refurbishment of 187 Shoreditch High Street, with change of use to flexible office/retail (B1/A1/A3) use; new public realm and street market; and façade retention of 186 Shoreditch High Street including accommodating new ground floor public access passageway from Shoreditch High Street to new public realm, along with associated landscaping, roof plant, terraces and other works incidental to the proposed development.	Granted 2018
30 (LBH)	168-178 Shoreditch High Street (LPA Ref: 2015/3316)	Demolition of petrol filling station and erection of a 6 storey (plus basement) mixed use development comprising 868 sqm of A3 (restaurants and cafes) floorspace on ground and basement floors and 2,884sqm of B1 (Business) floorspace on the 1st - 5th floors	Granted 2016

Fig 1.5.1: Cumulative Schemes



Project: Bishopsgate Goods yard
 Client: Bishopsgate Goods Yard Regeneration Ltd

Cumulative Schemes Surrounding the Site



Temple Group Ltd., The Woolyard, 52 Berners Street, London, EC3A 3UG
 Tel: 020 7354 5700 Fax: 020 7394 7871

- Legend**
- Site Boundary
 - Cumulative Schemes
 - 1km Site Buffer
 - Borough Boundaries



1.6 ENVIRONMENTAL TOPICS FOR ASSESSMENT

- 1.6.1 As explained in section 1.2 this ES Addendum will provide a complete revision of the relevant assessment chapters so that they can be kept “clean” to avoid complication and confusion. The following section outlines the proposed topics for assessment within the ES Addendum, the baseline conditions identified, the likely effects, the assessment methodology and the cumulative effects.

1.7 WASTE AND RECYCLING

SUMMARY OF BASELINE CONDITIONS

1.7.1 An analysis of baseline conditions at the site, local/district (i.e. LBTH and LBH/North London Waste Authority (NLWA)), regional (i.e. London) and national (i.e. England) levels will be conducted to determine current volumes of waste generation, waste composition and waste management practices. Sensitive receptors pertaining to waste management aspects of the Proposed Amendments will also be identified during this stage which will be carried forward and used throughout the assessment process. The baseline assessment will include examination of the following data:

- Assessment of local authority collected waste (i.e. household waste, municipal waste, etc.), commercial and industrial (C&I) waste and construction and demolition (C&D) waste streams;
- Current levels of waste generation at the site, local/district/ regional and national levels. With regards to the site level, baseline information will be used where available, where it isn't available predictions will be made using British Standards 5906:2005 or local relevant guidance methods;
- Current trends in waste management practice at the site, local/district/ regional and national levels; and
- A review of available waste management facilities likely to be impacted by the Proposed Amendments.

KEY ISSUES AND POTENTIAL LIKELY IMPACTS

1.7.2 The Waste and Recycling assessment will consider potential impacts arising from the generation and management of waste due to the Proposed Amendments. Both demolition and construction phase impacts and operational phase impacts will be considered as part of the assessment process. Potential impacts upon the following will be assessed:

- Demolition and construction site workers;
- End-users of the Proposed Amendments;
- Neighbouring users/occupiers of the Proposed Amendments; and
- Waste management infrastructure facilities.

ASSESSMENT METHODOLOGY

1.7.3 The Waste and Recycling assessment will analyse all phases of the Proposed Amendments from demolition and construction through to completion and operation. The assessment will identify any potentially significant impacts that may arise due to waste, both pre-mitigation and following the implementation of mitigation measures.

1.7.4 A review will be undertaken of requirements placed upon the Proposed Amendments under national legislation and implemented policy at all levels of Government (i.e. national, regional and local). Further to this, a review of requirements placed upon the Proposed Amendments in accordance with local standards and guidance will also be conducted so as to ensure compliance with relevant objectives and targets, particularly with regards to calculating waste volumes, storage and capacity.

1.7.5 A review of baseline conditions at the site, local/district, regional and national levels in relation to the current volume and composition of waste generated and waste management practices will be undertaken.

1.7.6 An estimate of the type and quantity of waste likely to be generated as a result of the operational Proposed Amendments in line with local guidance documents will be completed.

1.7.7 We will undertake an assessment of potential impacts pre-mitigation relating to the type and quantity of waste expected to be generated by the Proposed Amendments during both the demolition and construction and operational phases. The impact significance will be a function of the volume of waste expected to be generated by the Proposed Amendments and its associated composition.

1.7.8 An explanation of proposed mitigation measures recommended to be used by the Proposed Amendments will be provided. For the demolition and construction phase this will include an overview of the Site Waste Management Plan (SWMP). With regards to the operational phase, an outline of the operational waste management strategy will be included describing the proposed minimisation, segregation and recycling measures to be incorporated within the Proposed Amendments. Details regarding waste handling, storage area provision and waste collection arrangements will be provided.

1.7.9 All waste reduction measures and compliance with British Standards, Duty of Care and local policies will be discussed.

1.7.10 The assessment will identify any significant residual impacts due to waste that may arise following the recommendation of mitigation measures to be included into the Proposed Amendments. This will also consider any residual impacts to climate and climatic factors due to waste.

1.7.11 A qualitative comparison of the residual effects of the 2015 Proposed Development and the 2019 Proposed Amendments will be provided before and after mitigation is applied.

CUMULATIVE EFFECTS

1.7.12 Consideration will also be given to the effects of the Proposed Amendments in combination with other committed developments identified in **Table 1.5.4** and **Figure 1.5.3** on the resulting effects of their interaction with the Proposed Amendments during both the construction and the operational periods.

1.8 SOCIO ECONOMICS

SUMMARY OF BASELINE CONDITIONS

- 1.8.1 The site is located in Shoreditch, east London. It is located across two London Boroughs: Tower Hamlets and Hackney. The western part of the site lies within the Hoxton and East Shoreditch Ward of LBH, whilst the central and eastern section of the site is situated in the Weavers Ward of LBTH. Both the LBH LP33 and LBTH Local Plan 2031 recognise the development potential of the site in delivering commercial, residential and open space.
- 1.8.2 The site is situated in a mixed-use area of commercial, retail, light industrial and residential buildings. Buildings in closest proximity to the site are typically four to five storeys in height.

KEY ISSUES AND POTENTIAL LIKELY IMPACTS

- 1.8.3 The key issues and potential likely impacts include:
- employment generated during demolition and construction phase;
 - employment generated during operation of the Proposed Amendments associated with retail, office, the hotel and D2 uses set against the loss of jobs from the existing uses;
 - value of local spending by additional residents;
 - additional housing provision within LBTH, including affordable housing;
 - additional demand for services and facilities generated by the additional population, including childcare or early years education, primary and secondary schools, GP provision, open spaces and child and young people's play spaces;
 - provision of additional publicly accessible space, community and recreational facilities; and
 - impacts on crime and safety.

ASSESSMENT METHODOLOGY

Determination of the Baseline

- 1.8.4 A review of the relevant policy at the local (LBH and LBTH), regional (GLA) and national levels (in terms of urban regeneration and economic development) to identify the key issues of relevance to the Proposed Amendments will be undertaken.

- 1.8.5 The impacts of the Proposed Amendments are considered at varying spatial levels according to the nature of the impact considered and thus baseline data is collected at different levels.
- 1.8.6 The economic impact of the Proposed Amendments is considered relative to Greater London, as this represents the main labour market catchment area. Impacts on social and community infrastructure are assessed by various geographical impact areas based on likely or average travel distances to facilities. For example, education provision areas of impact and therefore of baseline mapping are based on the National Travel Survey 2017 average travel-to-school areas. Where the local authority is the area of impact, baseline data on both LBH and LBTH will be provided.
- 1.8.7 The baseline for the socio-economic conditions of the local area will be established from many sources. This includes the 2011 Census, ONS Business Register and Employment Survey, the Index of Multiple Deprivation 2015; housing needs assessments; government lists of educational and health facilities; and a site visit. It is not anticipated that specific consultation on socio-economic conditions will be necessary to complete the baseline, and this would only be undertaken if there is a specific gap in information.
- 1.8.8 Socio-economic information for Greater London as a whole will be also provided to contextualise the performance of the study area in comparison with a reference area.

Prediction Methodology

- 1.8.9 Key to the assessment is the concept of additionality. The assessment of net employment effects will employ the approach set out in the Homes and Communities Agency's Additionality Guide (4th Edition, 2014). The additionality assessment will take into account the reference case (the employment on site if the intervention did not go ahead), leakage and displacement effects and indirect and induced employment.
- 1.8.10 Assessments will be undertaken in the context of national and local planning and other policy, e.g. LBTH housing targets. While the assessment is in most cases necessarily qualitative it will draw on a range of quantitative data, e.g. population projections, employment forecasts, educational capacity projections and GP provision.
- 1.8.11 The sensitivity of receptors (e.g. existing residents) will consider their existing state in relation to the dimension being assessed (are they already disadvantaged); their ability to absorb, avoid, mitigate or take advantage of the effect; and level of policy priority. The magnitude of the impact will depend on factors such as the number of receptors which experience the impact, the duration of the impact and the nature of the detriment or benefit caused. The significance of the effects will be a product of both magnitude and sensitivity.

- 1.8.12 The division of the site over two boroughs poses a challenge for the determination of the methodology. Where GLA level methodologies or benchmarks are available, these will be applied. Fundamental to the assessment is an estimate of the likely additional population of the Proposed Amendments which informs many of the assessments. This estimate will be based on the GLA population yield calculator. The London Employment Sites Database will also be used for estimating employment associated with different use classes.
- 1.8.13 The residential element is only located in LBTH and thus only LBTH local policy will be considered for housing and affordable housing assessments. For child occupancy and school provision, LBTH rates would be used based on LBTH Infrastructure Delivery Plan (2017) and LBTH Planning for School Places 2017/18 review.
- 1.8.14 For open space provision will be quantified on a site wide basis and minimum provision per resident/employee will be based on borough's requirements. Where these differ between the two boroughs, the more stringent standard will be applied. For child play space the GLA SPG Calculator will be used (the LBTH calculator uses the same benchmark as the GLA).
- 1.8.15 The socio-economic assessment will also explore the scope for mitigation and enhancement measures to maximise the potential for adding value to the local economy and community. The residual effects on the Proposed Amendments during both the construction and operation will be presented within the chapter.
- 1.8.16 A qualitative comparison of the residual effects of the 2015 Proposed Development and the 2019 Proposed Amendments will be provided before and after mitigation is applied.

CUMULATIVE EFFECTS

- 1.8.17 Consideration will also be given to the effects of the Proposed Amendments in combination with other developments identified in **Table 1.5.4** and **Figure 1.5.3** on the resulting effects of their interaction with the Proposed Amendments during both the construction and the operational periods. Impacts as a result of construction employment, operational employment, additional residential units, social infrastructure, open space and play space will be considered.

1.9 GROUND CONDITIONS

SUMMARY OF BASELINE CONDITIONS

- 1.9.1 In 2008, Concept undertook a comprehensive ground investigation of the site, including the chemical analysis of soils, leachate, and groundwater samples, and ground gas monitoring.
- 1.9.2 The results of the ground investigation were compared to commercial screening criteria, which showed that there was no significant or widespread contamination identified on site.
- 1.9.3 As a result of this site investigation ARUP undertook a ground contamination risk assessment and outline remediation strategy for which it was considered that no further on-site work would be necessary.
- 1.9.4 A desktop ground condition assessment was undertaken by AECOM in 2013 which reviewed of the previous site investigations, risk assessment and remediation strategy. Temple will undertake a review of the assessments undertaken to date and update where necessary.
- 1.9.5 Based on the available data a description of the baseline conditions will be provided to include:
- Ground and groundwater conditions;
 - Contamination potential including asbestos;
 - Presence of underground structures (if possible); and,
 - Unexploded Ordnance (UXO).

KEY ISSUES AND POTENTIAL LIKELY IMPACTS

- 1.9.6 The ground conditions assessment will consider potential impacts of both demolition and construction phase and operational phase of the Proposed Amendments and mitigation measures will be identified where appropriate.

ASSESSMENT METHODOLOGY

- 1.9.7 It is proposed that a desk-based assessment will be undertaken drawing on the previous assessments undertaken to assess the potential for historic contamination and the risk to ground conditions from the Proposed Amendments. This would include the following:
- Review of the Legislative and Planning Policy Context, in the case of the

Bishopsgate Goodsyrd, this will include the key local plans and policies for the boroughs of both the LBH and the LBTH;

- Explanation of the Assessment Methodology and Significance Criteria;
- Purchase of third party information e.g. a current Landmark Envirocheck report and relevant BGS borehole logs;
- Review of previous site investigation reports including the ground contamination risk assessment and outline remediation strategy; and
- Assessment of the potential impacts (both demolition and construction phase and operational phase of the Proposed Amendments) and recommendations of further mitigation measures (e.g. a Phase 2 Site Investigation (SI) prior to demolition and construction, soil classification testing, verification testing etc.).

- 1.9.8 A qualitative comparison of the residual effects of the 2015 Proposed Development and the 2019 Proposed Amendments will be provided before and after mitigation is applied.

CUMULATIVE EFFECTS

- 1.9.9 Consideration will also be given to the effects of the Proposed Amendments in combination with other developments identified in **Table 1.5.4** and **Figure 1.5.3** on the resulting effects of their interaction with the Proposed Amendments during both the construction and the operational periods.

1.10 TRAFFIC AND TRANSPORT

SUMMARY OF BASELINE CONDITIONS

1.10.1 The following description presents an overview of the baseline conditions and a more detailed description will be presented within the ES Addendum.

Traffic Road Network

1.10.2 The site is bounded by transportation infrastructure in the form of road and rail. The northern boundary of the site is formed by the A1209 Bethnal Green Road and Sclater Street, Brick Lane forms the eastern boundary and the A10 Shoreditch High Street bounds the west. The Great Eastern Main Line and West Anglia Main Line railways from Liverpool Street station form most of the southern boundary of the Application Site, with the A1202 Commercial Street to the southwest. Wheeler Street / Braithwaite Street runs north/south through the centre of the Application Site.

1.10.3 The A10 is a main arterial road through London, providing access from The City up to the North Circular Road and ultimately the M11 at Cambridge. The A1209 and A1202 provide access to Bethnal Green, Wapping and Old Street. Brick Lane is a predominantly commercial road, with intermittent on-street parking provision.

Public Transport

1.10.4 The site is located within Zone 1 of TfL's travel zones, the site has excellent links to a variety of sustainable travel networks. These include the London Overground network, London Underground network, London Buses, DLR, cycling infrastructure as well as high quality pedestrian network.

1.10.5 The site is well served by public transport. As well as Shoreditch High Street station on-site, Liverpool Street Network Rail and London Underground station is a 10 minute walk to the south. Bethnal Green (Central line) and Whitechapel (District and Hammersmith and City lines) are also within a 20 minute walk of the site. There are multiple bus routes serving the immediate area around the site, including the 67 along the A1202 and A10 and the 8 and 388 along the A1209. There is also a Taxi Rnk located on Ebor Street (Shoreditch House).

1.10.6 According to Transport for London (TfL)'s WebCAT¹³, the site has a Public

Transport Access Level (PTAL) ranging from 5 and 6b PTAL. PTAL is a measure which rates locations by distance from frequent public transport services. The best possible rating is 6b. High PTAL levels suggest excellent connectivity to the public transport network.

Pedestrian and Cycle

1.10.7 The site also enjoys also access to local cycling infrastructure including two Santander Cycles stations nearby on the A1209 and at Brick Lane Market.

1.10.8 Pedestrian networks in the area include footways throughout all nearby streets and connections to the main local attraction points, including transport nodes and other local centres. Pedestrian crossing points are available at appropriate locations on the surrounding roads, including traffic light crossings and zebra crossings.

Baseline Data Sources

1.10.9 The following data sources will be utilised in the assessments:

- Surveys undertaken in 2018 on the local highway network:
 - Automatic Traffic Count (ATC);
 - Manual Classified Count (MCC) of junctions;
 - Pedestrian count; and
 - Cycle count.
- The survey area includes all links around the site plus key locations on the wider network. The surveys cover weekday peaks but also Friday and Saturday evenings (nightlife) and Sunday daytime (Brick Lane market);
- Questionnaire and pedestrian count survey data at Spitalfields Market from January 2014;
- Residential, office and hotel trip rates in the TRICS database (incorporating TRAVL);
- Servicing surveys at various London developments undertaken by WSP;
- Secondary sources, namely the planning submissions for cumulative schemes as well as Personal Injury Accident (PIA) data;
- Area schedule for the Proposed Amendments.

KEY ISSUES AND POTENTIAL LIKELY IMPACTS

1.10.10 The likely significant impacts of the Proposed Amendments are as follows:

¹³ Transport for London (2017) Web Connectivity Assessment Toolkit (WebCAT). Available from: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

- impacts of construction traffic on the local and wider highway network, including the routing of construction traffic during the different phases of construction, along with the consequential effects on pedestrian routes and access to the site in general;
- additional vehicle movements on the surrounding highway network during operation, particularly during the peak AM and PM hours (taking into account when different stages of the development will enter their operational phase);
- additional pedestrian and cycle movements during operation, particularly during the peak AM and PM hours;
- additional movements on public transport networks during operation, particularly during the peak AM and PM hours; and
- potential additional bus movements during operation.

1.10.11 It is anticipated that the Proposed Amendments will include accessible car parking provision for residents, however this is likely to be on-street as opposed to on-site. A taxi drop-off is proposed (though not agreed) to be located outside the hotel entrance on Braithwaite Street, however, southbound taxi movement along Braithwaite Street could conflict with pedestrians on main east-west axis. Short stay cycle parking will also be provided for retail users.

1.10.12 During the construction phase of the Proposed Amendments, there is potential for temporary closure of roads, however this is not likely to result in significant environmental effects. Potential permanent road closures or traffic diversions may also be discussed with LBTH Highways, LBH Highways and the GLA, as a mitigation measure to enhance highway safety or amenity levels.

1.10.13 The Transport Assessment to be carried out to inform the EIA will concentrate on the likely non-car travel patterns associated with the site and how these can be accommodated within the existing local public transport, cycle and walking networks. Access for all users will be carefully integrated into the design of the Proposed Amendments. This includes not only access for those travelling by public transport, cycling, walking and by car but also how servicing, delivery and emergency vehicles can undertake their activities efficiently, safely and with minimum disruption to the operation of the site and the local highway network.

ASSESSMENT METHODOLOGY

1.10.14 The following assessment methodology will be utilised in the assessments:

- Baseline flows on the pedestrian, cycle and highway network taken from surveys.
- Cumulative schemes:
 - Sites provided by the planning consultant;

- Trips assigned onto the transport network as per each site's planning documents or, where unavailable, based upon the methodology for the Proposed Amendments (see below).

• Proposed Amendments:

- Trip generation using TRICS/TRAVL data for residential, office and hotel based on floorspace;
- Retail trip generation using Spitalfields survey data. No longer applying pro-rata reduction in trips, for robustness;
- Servicing trip generation
- Vehicle trip distribution using existing turning counts of comparable vehicles on the wider network (e.g. LGVs/HGVs for servicing), plus reasonable assumptions on local routing based upon highway network (e.g. one-way streets);
- Pedestrian distribution based upon existing turning proportions together with reasonable assumptions on future distribution accounting for changes to the pedestrian network (e.g. new links, amended crossings).

ASSESSMENT SCENARIOS

1.10.15 The following assessment scenarios will be considered:

- Effect of Development: 2018 Baseline + Proposed Amendments (Maximum*); and
- Cumulative Assessment: 2018 Baseline + Proposed Amendments (Maximum*) + Cumulative Schemes and Shoreditch High Street Station growth (where applicable).

* Maximum Build Out – Combined Outline and Detailed Components (based on maximum parameters)

1.10.16 The Cumulative Assessment scenario will consider the conditions when the Proposed Development is expected to open, and include consideration to other developments that will have an impact on the study area (otherwise known as cumulative developments). The cumulative developments will be identified in the EIA Scoping process, and these schemes will be considered based upon whether they will have an impact on the transport/highway networks surrounding the site.

Potential Receptors

1.10.17 Sensitive receptors are considered to be those that the Proposed Amendments

could potentially significantly affect within the assessment area. The following receptors are identified for the current assessment:

- pedestrians and cyclists: impacts to their safety and amenity or severance and delay of routes;
- road users: vulnerable to road network delay and potential changes to safety; and
- public transport patronage and parking capacity changes.

- 1.10.18 Effects on the above sensitive receptors have been included with the PERS/CERS audit, and the findings of this study will be used to develop mitigation measures that would enhance the quality and availability of existing sustainable transport connections around the site.
- 1.10.19 The residual effects on the Proposed Amendments during both the construction and operation will be presented within the chapter.
- 1.10.20 A qualitative comparison of the residual effects of the 2015 Proposed Development and the 2019 Proposed Amendments will be provided before and after mitigation is applied.

CUMULATIVE EFFECTS

- 1.10.21 The cumulative effects assessment will consider the Proposed Amendments during demolition, construction, and refurbishment, and once the Proposed Amendments are completed and occupied, taking into consideration the effect of development on the local pedestrian, cycle, public transport, and highway networks as appropriate.
- 1.10.22 Baseline future traffic scenarios will include local background traffic growth rates, based on area and road type, in addition to the inclusion of local committed developments as identified in **Table 1.5.4** and **Figure 1.5.3**, and where relevant allocated sites, agreed through the EIA scoping process.

1.11 WIND MICROCLIMATE

SUMMARY OF BASELINE CONDITIONS

- 1.11.1 Winds for the London area are predominantly from the southwest, with a secondary peak from the north east during spring. Winds are typically stronger in the winter season, and lighter throughout the summer. The site is situated in a predominantly commercial area, with retail and office use buildings of varied heights. To the north east of the site are low rise industrial buildings up to two storeys in height, whilst to the north west lies the eight storey 'Tea Building'. Buildings to the west, east and south of the site are typically four to five storeys in height.
- 1.11.2 A baseline of wind conditions will be established through a combination of desk review studies and wind tunnel testing as described below.

KEY ISSUES AND POTENTIAL LIKELY IMPACTS

- 1.11.3 The key potential wind effects associated with the Proposed Amendments are:
- The introduction of buildings with the potential to deflect high-level winds down to pedestrian level before channelling around the building fronts and accelerating around the corners. There is also potential for channelling of prevailing winds along and between the proposed buildings.
 - The introduction of public open space, where recreational activities are more sensitive to wind conditions.

ASSESSMENT METHODOLOGY

- 1.11.4 The wind microclimate assessment will assess the wind environment at pedestrian level for the Proposed Amendments in terms of comfort and safety across UK planning authority recognised industry standards.
- 1.11.5 Desk top review studies will provide a review of the likely wind flow patterns at the site for existing and proposed site conditions that are deemed to affect the pedestrian level wind environment giving due consideration to prevailing, as well as non-prevailing, wind sectors identified from wind climate models.
- 1.11.6 Based on the wind flow patterns, the review will identify areas where the Proposed Amendments have high potential to cause significant impacts to pedestrians and advise on the nature and likely extent of wind mitigations to

ameliorate these impacts to acceptable levels as appropriate.

- 1.11.7 Wind tunnel studies will model baseline and future conditions. The model constructed for wind tunnel testing will include a 1:400 scale model of the Proposed Amendments, including nearby surrounding buildings up to a distance of approximately 480 m from the site.
- 1.11.8 The wind tunnel tests will measure local wind speeds at sensitive areas within and around the site for three configurations, namely:
- the baseline;
 - the Proposed Amendments with existing surrounding buildings; and
 - the Proposed Amendments with cumulative surrounding buildings.
- 1.11.9 This test data will be combined with analyses of up-wind terrain and historic meteorological data and classified according to the Lawson Comfort Criteria to determine wind comfort and safety.
- 1.11.10 In cases where the local wind conditions exceed the required thresholds for comfort or safety, a mitigation strategy will be developed. The mitigation measures would be developed and verified for their effectiveness through further wind tunnel tests.
- 1.11.11 The residual effects on the Proposed Amendments during both the construction and operation will be presented within the chapter.
- 1.11.12 A qualitative comparison of the residual effects of the 2015 Proposed Development and the 2019 Proposed Amendments will be provided before and after mitigation is applied.

CUMULATIVE EFFECTS

- 1.11.13 Where relevant the committed developments identified in **Table 1.5.4** and **Figure 1.5.3** will be modelled and tested in the wind tunnel in line with the above methodology. The resulting effects of their interaction with the Proposed Amendments during both the construction and the operational periods will be identified.

1.12 DAYLIGHT, SUNLIGHT, OVERSHADOWING, SOLAR GLARE AND LIGHT POLLUTION

SUMMARY OF BASELINE CONDITIONS

- 1.12.1 The site is partly occupied by permanent structures associated with the current London Overground use. Temporary structures present on-site include a row of shipping containers along the northern boundary (the Boxpark) of a maximum two storeys in height.
- 1.12.2 The Proposed Amendments have been influenced by the location of neighbouring residential properties and in order to minimise the impact upon neighbours the greatest height and density is located at the western end of the site where there are fewer residential neighbours and the development reduces in height as it moves east toward Brick Lane where there are a greater number of residential neighbours.
- 1.12.3 There is the potential for significant effects to neighbouring properties' daylight and sunlight as well as overshadowing impacts to neighbouring areas of amenity.
- 1.12.4 For the baseline assessment the daylight and sunlight conditions for each surrounding residential property, will be assessed in accordance with the current site conditions. This baseline condition will be assessed using the various daylight and sunlight methods described in the BRE Guidelines (VSC, NSL and APSH methods). The daylight and sunlight analysis will be calculated from the 3D computer model based upon specialist software.

KEY ISSUES AND POTENTIAL LIKELY IMPACTS

- 1.12.5 The Proposed Amendments would bring about a significant change to the massing (i.e. bulk, height) of the site, a significant area of which is currently vacant of any buildings.
- 1.12.6 The residential accommodation within the Proposed Amendments will require the potential for acceptable levels of daylight and sunlight amenity.
- 1.12.7 Residential neighbouring properties are considered sensitive to changes in daylight and sunlight. Those properties identified within the 2015 EIA will be assessed again in the 2018 EIA. These include the following:

- 1.12.8 There is the potential for overshadowing affects to areas of amenity surrounding the site. The 2015 EIA considered overshadowing effects to a wide area as well as focussed studies on eight areas of public or communal amenity. This will be repeated in the 2018 EIA.
- 1.12.9 There is the potential for highly glazed or reflective buildings to reflect sunlight towards car and train drivers, thereby potentially causing solar glare. A solar glare assessment will therefore be undertaken for all highly glazed buildings proposed in detail, likely to be commercial in tenure. This will consider the potential effects to nearby road junctions and railway lines.
- 1.12.10 The potential effects of solar glare cannot be technically assessed for those buildings submitted in outline and as such this will form part of any subsequent reserved matters application.
- 1.12.11 The Institute of Lighting Professionals (ILP) guidance on light pollution highlights the potential for high powered external lighting to cause adverse light pollution effects. Whilst the detailed external lighting design will not have been completed for the application, this will be designed in accordance with the ILP guidance and as such light pollution effects will be minimised. There is, however, also the potential for highly glazed commercial buildings to be occupied at night and their internal fittings to cause light intrusion effects to neighbouring residential windows within approximately 20 m. A light intrusion assessment will therefore be undertaken for all highly glazed commercial buildings proposed in detail. Those residential facades within 20 m of these will be technically assessed.
- 1.12.12 It is not possible to assess light pollution from outline buildings as a detailed design is required to locate the light fittings. The potential for light pollution from the outline buildings will therefore be assessed as part of any subsequent reserved matters application.

ASSESSMENT METHODOLOGY

- 1.12.13 In accordance with BRE guidance, technical assessments of Vertical Sky Component (VSC) and No Sky Line (NSL) will be undertaken to identify the potential daylight effects to neighbours. For certain properties, where room layouts are known, this may be supplemented with an assessment of Average Daylight Factor (ADF) but the chapter will make clear if and where this has been done.
- 1.12.14 Sunlight to neighbouring properties will be assessed by way of the Annual Probable Sunlight Hours (APSH) methodology, as recommended within the BRE guidance. All windows within 90 degrees of due south and looking over the site will be assessed although living rooms will be given the most weight as are considered most sensitive to changes in sunlight.
- 1.12.15 A transient overshadowing assessment will be undertaken for the site and surrounding area to present overall levels of shadow and their extents. Should

this show nearby sensitive areas of public or communal amenity to be overshadowed, a numerical assessment of Sun Hours on Ground will be undertaken.

- 1.12.16 The above will be undertaken within the following scenarios:
- Baseline vs The Proposed Amendments
 - Baseline vs Cumulative
- 1.12.17 Where relevant, reference will be made to alternative target criteria as specified within Appendix F of the BRE Guidelines and previously agreed within the GLA.
- 1.12.18 In relation to the levels of light within the site, no detailed designs are proposed for residential buildings and so detailed assessments cannot be undertaken. A Daylight Design Guide will be prepared outlining the potential of each building to provide well daylit units and suggesting design solutions to mitigate any areas with a lower potential for daylight. This will be appended to the chapter with a brief summary included within.
- 1.12.19 A solar glare assessment will be undertaken considering the potential effects of highly glazed or reflective buildings proposed in detail to nearby car and train drivers.
- 1.12.20 A light intrusion assessment will be undertaken considering the potential effects of any highly glazed commercial buildings' internal lighting to nearby residential windows. Only for those buildings proposed in detail will be considered potential emitters as a detailed design is required for assessment.
- 1.12.21 The residual effects on the Proposed Amendments during both the construction and operation will be presented within the chapter.
- 1.12.22 A qualitative comparison of the residual effects of the 2015 Proposed Development and the 2019 Proposed Amendments will be provided before and after mitigation is applied.

CUMULATIVE EFFECTS

- 1.12.23 Where relevant consideration will be given to the effects of the Proposed Amendments in combination with other developments identified in **Table 1.5.4** and **Figure 1.5.3** on the resulting effects of their interaction with the Proposed Amendments during both the construction and the operational periods.

1.13 AIR QUALITY

SUMMARY OF BASELINE CONDITIONS

- 1.13.1 The whole of LBH and LBTH are included within Air Quality Management Areas (AQMA) declared in respect to the annual mean nitrogen dioxide (NO₂) air quality objective (and also the NO₂ one-hour objective in LBH) and the 24-Hour mean particulate matter (PM₁₀) objective. The site is partially located within a Greater London Authority (GLA) Air Quality Focus Area located in the Old Street City Road/ Old Street/ Great Eastern Street/ Shoreditch High Street area. In addition to this, the site is also located approximately 20 m north of another focus area along Commercial Street. These focus areas identify locations where the EU NO₂ annual limit value is exceeded and are locations with high human exposure.
- 1.13.2 The Local Air Quality Management Technical Guidance (LAQM.TG(16))¹⁴ sets out that the annual limit applies to all locations where members of the public might be regularly exposed, such as building façades of residential properties, schools, hospitals and care homes, for example. These are described as sensitive receptors. Sensitive receptors that may be affected by the Proposed Amendments include residential receptors in the local vicinity, Culloden Primary School and Langdon Park School. Depending on how much road traffic (i.e. light duty and heavy duty vehicles) the development generates, the Proposed Amendments may also affect sensitive receptors in the wider area as well.
- 1.13.3 The existing air quality in the area is relatively poor, due predominantly to the high traffic volumes, particularly on the A10 and the A1202 (Commercial Street/ Great Eastern Street). Defra background mapped concentrations of NO₂ are in the order of 38.6 µg/m³ for the present year (2018) for the 1 km x 1 km grid square encompassing the site and surrounding area. Local monitoring in the vicinity of the Proposed Amendments has historically exceeded the annual mean objective for NO₂.

KEY ISSUES AND POTENTIAL LIKELY IMPACTS

- 1.13.4 The Proposed Amendments will generate changes in the volume of traffic on local roads, both during construction and operation. The emissions from both construction and operational traffic may lead to changes in air quality in terms of NO₂, PM₁₀ and PM_{2.5}.
- 1.13.5 There is potential for construction activity to increase dust soiling / deposition and short-term concentrations of PM₁₀ above baseline levels which could also result in health impacts.
- 1.13.6 The Proposed Amendments will introduce new receptors into an area with elevated pollution levels. The Proposed Amendments will need to ensure that exposure to elevated pollution levels is appropriately mitigated.
- 1.13.7 Air quality impacts may therefore arise from:
- dust emissions generated during construction;
 - road traffic emissions during construction; and
 - road traffic emissions during operation.
- 1.13.8 The London Plan¹⁵ and the Sustainable Design and Construction Supplementary Planning Guidance (SPG)¹⁶ requires major developments to be at least air quality neutral. If the Proposed Amendments do not meet the criteria for air quality neutrality, further on or off-site mitigation may be required. The new draft of the London Plan¹⁷ includes a requirement for large-scale developments to be air quality positive.

ASSESSMENT METHODOLOGY

- 1.13.9 A standalone air quality chapter will be prepared for inclusion into the ES Addendum.

Determination of Baseline

- 1.13.10 A number of desktop sources will be reviewed to determine the baseline for air quality including:
- Monitoring data from www.londonair.org.uk;

¹⁴ Department for Environment Food & Rural Affairs. (2018). Local Air Quality Management Technical Guidance LAQM.TG(16).

¹⁵ Greater London Authority. (2016). The London Plan – The Spatial Development Strategy for London Consolidated with Alterations since 2011. March 2016.

¹⁶ Greater London Authority. (2014). Sustainable Design and Construction Supplementary Planning Guidance. London Plan 2011 Implementation Framework. April 2014.

¹⁷ Greater London Authority. (2017). The London Plan – The Spatial Development Strategy for Greater London Draft for public consultation. December 2017.

- LBTH and LBH air quality review and assessment information and annual status report;
 - Greater London Authority air quality modelling from the London Atmospheric Emissions Inventory; and
 - Defra background maps.
- 1.13.11 A construction dust risk assessment will be carried out in line with Greater London Authority's (GLA's) The Control of Dust and Emissions during Construction and Demolition (2014) supplementary planning guidance¹⁸. This will consider all sensitive receptors within 350 m of the application site boundary, and within 50 m either side of the construction trackout route extending for 500 m from the site entrances. As the development is phased, we will consider receptors located in the occupied phases.

Prediction Methodology

- 1.13.12 The EIA will assess air quality impacts with respect to NO₂, PM₁₀ and PM_{2.5} concentrations. The scope of works for the air quality assessment will be agreed with the GLA.
- 1.13.13 An air quality neutral assessment will be carried out in line with the GLA's supplementary planning guidance on Sustainable Design and Construction. This SPG states that major developments within London should be at least 'air quality-neutral' and provides a set of benchmarks against which a new major development must comply, for both traffic emissions and fixed-source combustion process emissions.
- 1.13.14 The screening methodology set out in the Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) guidance¹⁹ will be used to determine whether the levels of traffic generation during both construction and operation are sufficient to necessitate a detailed assessment of traffic related air quality effects. The traffic screening will also determine the extent to which traffic generated by the development has the potential to affect sensitive receptors in the wider area. Emissions from the Overground line do not need to be considered as the line is electrified. There are no other rail lines in the vicinity which need to be considered in the assessment.

1.13.15 The dispersion of road traffic pollutant emissions (NO₂, PM₁₀ and PM_{2.5}) will be modelled with and without the development using the ADMS dispersion model. Meteorological data from the most representative year will be used in the model. The model will be verified against local monitoring data for both NO₂ and PM₁₀ in line with LAQM.TG(16)²⁰. It is considered that there is sufficient monitoring data available for use in model verification and as such no additional monitoring will be required as part of this scope.

1.13.16 A base year model and comparison between a "do-minimum" model (i.e. without the Proposed Amendments, but including all other committed developments for the assessment year) and a "do-something" model (i.e. with the Proposed Amendments and all other committed developments for the assessment year) will be included, as set out in Volume 11, Section 3, Part 1 HA207/07: Air Quality of the Design Manual for Roads and Bridges (2007)²¹. It is anticipated that the following scenarios will be modelled, where screening criteria are met:

- Baseline;
- Opening year (without scheme future baseline) "do-minimum" + committed developments;
- Opening year (with scheme) "do-something" + committed developments; and
- Depending on traffic flows in intermediate years, we will screen the flows and undertake additional model scenarios for phased occupation if necessary.

1.13.17 All traffic data used in the emissions dispersion modelling will come from the traffic modelling assessment undertaken as part of the traffic and transport assessment.

1.13.18 We will review the wind microclimate assessment in order to inform the decision as to whether to include the urban canopy module in the ADMS model runs.

1.13.19 Defra's nitrogen oxides (NO_x) to nitrogen dioxide (NO₂) calculator will be used to determine concentrations relevant to the air quality objectives. The assessment will consider the worst-case sensitive receptor locations such as residential units, schools and hospitals as well as play parks and other high-use amenity spaces e.g. shopping areas within 200 m of affected vehicle routes. We will obtain a

¹⁸ Greater London Authority. (2014). The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance. London Plan 2011 Implementation Framework. July 2014.

¹⁹ Moorcroft and Barrowcliffe. et al. (2017) Land-use Planning & Development Control: Planning for Air Quality. Environmental Protection UK and the Institute of Air Quality Management, London

²⁰ Department for Environment, Food and Rural Affairs. 2016. Local Air Quality Management: Technical Guidance LAQM.TG(16)

²¹ The Highways Agency (2007). Design Manual for Roads and Bridges, Volume 11, Environmental Assessment: Section 3 Environmental Assessment Techniques

statement from the designers as to how these receptor locations have been optimised to reduce exposure. The development is being designed using best practice for minimising new exposure.

- 1.13.20 The changes in concentration between the do-minimum and do-something scenarios and comparison of modelled concentrations against the air quality objectives, will be used to describe the air quality impacts. Impact descriptors will be determined for each assessed receptor, as per the EPUK/IAQM guidance¹⁹. These impact descriptors will be converted to effect descriptors, appropriate for use in an EIA.
- 1.13.21 Results will also be presented as ground level contour plots in order to visualise pollutant concentrations in the “do-something” scenarios. These will be for:
- Traffic emissions only (NO₂ and PM₁₀).
- 1.13.22 Following the findings of the assessment, high-level recommendations will be provided, if appropriate, for mitigation of the potential impacts that the Proposed Amendments may have on local air quality and / or to prevent the risk of new exposure. These will be in line with industry best-practice.
- 1.13.23 The residual effects on the Proposed Amendments during both the construction and operation will be presented within the chapter.
- 1.13.24 A qualitative comparison of the residual effects of the 2015 Proposed Development and the 2019 Proposed Amendments will be provided before and after mitigation is applied.

CUMULATIVE EFFECTS

- 1.13.25 A review of cumulative air pollutant emissions in the local development area will be undertaken for those committed developments identified in **Table 1.5.4** and **Figure 1.5.3**. Traffic data from those schemes will be included in the ‘do-something’ scenario as appropriate.

1.14 NOISE AND VIBRATION

SUMMARY OF BASELINE CONDITIONS

- 1.14.1 The site is exposed to noise from sources such as road, rail and/or other mixed noise sources including:
- The sources of road traffic noise include: Great Eastern St (A1202), Commercial Street (A1202), Shoreditch High Street (A10), Bethnal Green Road (A1209), Sclater Street and Quaker Street.
 - The sources of rail noise include: the London Underground line passing through Shoreditch High Street Station, National Rail entering and departing Liverpool Street Station, and the London Underground Central Line. Rail sources operate around 22 hours a day including freight.
 - Commercial and mechanical plant noise from surrounding restaurants, pubs and clubs.

KEY ISSUES AND POTENTIAL LIKELY IMPACTS

- 1.14.2 The following have the potential for significant effects at existing and future noise sensitive receptors due to the Proposed Amendments as a result of:
- noise and vibration from construction on surrounding residential and non-residential receptors;
 - increase in off-site road traffic noise from construction traffic on residential and non-residential receptors adjacent to traffic routes;
 - road traffic noise changes from operational phase on residential and non-residential receptors adjacent to traffic routes; and
 - operational noise associated with the development, including noise from mechanical plant construction on surrounding residential and non-residential receptors.
- 1.14.3 The site suitability assessment will also assess the potential adverse effect of the following sources on the proposed noise sensitive uses (dwellings):
- ground borne noise and vibration from existing site sources (e.g. rail); and
 - ambient noise levels from existing site sources in internal and external noise sensitive spaces.

ASSESSMENT METHODOLOGY

- 1.14.4 Four unattended noise monitors and one unattended vibration monitor were set-

up at the site.

- 1.14.5 The monitors recorded continuously for a period of up to 7 days. Supplementary satellite attended short term noise monitoring were completed simultaneously with the long-term measurements at various locations across the site as required during the site visits to install and decommission the unattended monitors.
- 1.14.6 Survey measurements will be carried out in accordance with guidelines in British Standard (BS) 7445:1991:
- 1.14.7 *“Description and measurement of environmental noise part 2 – Acquisition of data pertinent to land use and other relevant standards and guidance.”*
- 1.14.8 The survey will measure A-weighted and octave band measurements of the following parameters:
- Leq;
 - Lmax;
 - L10; and
 - L90.
- 1.14.9 All sound level meters will be of type 1 accuracy, within current manufacturer periods of calibration and will be calibrated before and after all survey works. Meteorological conditions will also be observed to establish the validity of the data.
- 1.14.10 Vibration survey measurements will be carried out in accordance with BS 7385-2:1993 “Evaluation and measurement for vibration in buildings. Guide to damage levels from ground borne vibration” and BS 6472-1:2008 “Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting”. The vibration survey will measure the following parameters: vibration dose value on three orthogonal axes and be weighted accordingly; and unweighted third-octave band peak and RMS acceleration values.
- 1.14.11 The residual effects on the Proposed Amendments during both the construction and operation will be presented within the chapter.
- 1.14.12 A qualitative comparison of the residual effects of the 2015 Proposed Development and the 2019 Proposed Amendments will be provided before and after mitigation is applied.

CUMULATIVE EFFECTS

- 1.14.13 In line with the committed developments identified in **Table 1.5.4** and **Figure 1.5.3** the future development traffic flows will be calculated and assessed for their cumulative effects on noise at the identified receptors surrounding the Proposed Amendments.

1.15 WATER RESOURCES AND FLOOD RISK

SUMMARY OF BASELINE CONDITIONS

- 1.15.1 No surface waterbodies are present on the site and the nearest major surface water body is the River Thames, approximately 1.7 km south of the site and Regents Canal, approximately 1.5 km north east of the site. The River Thames is tidal in this location.
- 1.15.2 Although the development site is not directly linked to the River Thames through surface water connections, there is an indirect pathway to the River Thames via the TWUL sewer network, which discharges into the River Thames via combined sewer overflows (CSOs). The River Thames is therefore taken forward as part of this assessment as it is a receptor for spills from CSOs.
- 1.15.3 The tidal stretch of the River Thames is divided into three water bodies for the purpose of the Water Framework Directive, with the site being located closest to the Middle Thames water body, which is classified as heavily modified due to its role in coastal and flood protection and navigation purposes.
- 1.15.4 The Middle Thames water body is currently considered to be of Moderate Ecological Potential and failing to meet Good Chemical Potential. The tidal section of the River Thames on a whole is not expected to meet Good Ecological Potential by 2018 as this would be disproportionately expensive and technically unfeasible.
- 1.15.5 The site is approximately 100 m east of the former course of the River Walbrook (a tributary of the Thames). At present the River Walbrook is contained within a culvert beneath Curtain Road, to the east of Shoreditch High Street.
- 1.15.6 The site is located within Flood Zone 1 and is therefore at low risk of flooding from fluvial and tidal sources, with an annual exceedence probability (AEP) of <0.1% (1 in 1000) from fluvial or tidal flooding in any year.
- 1.15.7 Based on a review of the LBTH and LBH Strategic Flood Risk Assessment (SFRA) the site is at low risk from both tidal, fluvial flooding and groundwater flooding. However, the site is at risk of pluvial (surface water) flooding.

1.15.8 The area of the site is directly underlain by the Taplow Gravel Formation which are River Terrace Deposits and classified by the Environment Agency as a Secondary (A) Aquifer. The soils overlying the River Terrace Deposits are classed by the Environment Agency as being of high leaching potential and as such the groundwater in the River Terrace Deposits is classified as highly vulnerable.

1.15.9 The London Clay Formation is classified by the EA as Unproductive Strata. The underlying White Chalk and Thanet Formation, and occasionally, the lower part of the Lambeth Group which overlies the Thanet Formation are in hydraulic continuity and therefore are normally considered together as the Chalk/Basal Sands aquifer. The White Chalk is classified as a Principal Aquifer by the EA whereas the Thanet Formation and Lambeth Group are classified as Secondary Aquifers.

1.15.10 The site does not lie in a groundwater Source Protection Zone (SPZ).

KEY ISSUES AND POTENTIAL LIKELY IMPACTS

Demolition / Construction

- 1.15.11 The following pollution sources arising from demolition / construction works that have the potential to affect water resource receptors have been identified and will be considered in the ES:
- creation of preferential pathways and disturbance to groundwater;
 - disturbance of existing drainage systems and water supply networks;
 - disturbance of contaminated land;
 - leaks and spillages of oils/hydrocarbons, etc;
 - release/ mobilisation of suspended sediments; and
 - concrete and cement products.
- 1.15.12 Other activities associated with the demolition / construction phase comprise:
- flood risk (groundwater and surface water);
 - additional water demand; and
 - additional wastewater generation.

Operation

1.15.13 The following pollution sources arising from the operational phase of the development that have the potential to effect water resource receptors have been identified and will be considered in the ES Addendum:

- leaks and spillages of oils/hydrocarbons, etc.

1.15.14 Other activities associated with the operation phase comprise:

- flood risk (groundwater and surface water);
- additional water demand; and
- additional wastewater generation.

ASSESSMENT METHODOLOGY

1.15.15 As the site is over 1ha in size a Flood Risk Assessment (FRA) is required to accompany the hybrid planning application, as per the requirements of National Planning Policy Framework (NPPF).

1.15.16 Temple will undertake the FRA in accordance with NPPF. The EA, LBTH, LBH and Thames Water Utilities Limited will be consulted as part of the assessment.

1.15.17 The scope of the FRA will include:

- Review of relevant planning policy and available Strategic Flood Risk Assessments;
- Collection and review of contemporary and historical flood risk information;
- Identification of sources and probability of flood risk from all sources both pre- and post-development;
- Calculations for surface water run-off, both pre- and post-development;
- Recommendations for flood mitigation/management measures, including management of surface water; and
- Identification of potential off-site effects and residual risks.

1.15.18 In addition to the FRA, a water resources chapter will be prepared inclusive of the following sections:

- Legislative and planning policy context;
- Explanation of assessment methodology and significance criteria;
- Analysis of baseline conditions – geology, geomorphology and hydrology, hydrogeology and groundwater, surface water resources, aquifers, abstractions, source protection zones, water quality, water services;
- Assessment of potential effects and mitigation measures (during demolition/construction and operational phases);

- Summary of FRA issues; and
- Assessment of residual and cumulative effects.

1.15.19 The EIA chapter will also include an assessment of the potential water demand and wastewater generation of the Proposed Amendments. Remedial measures for additional water demand such as the potential for the inclusion of water efficient fixtures and fittings will be proposed within the EIA.

1.15.20 There are three stages to the assessment of the impact on water resources as follows:

- A level of sensitivity (low to very high) is assigned to the water resource receptor based on a number of attributes such as water supply, biodiversity, transport and dilution of waste products, recreation, and conveyance;
- The magnitude of the potential and residual impact (classed as high, medium, low or negligible) as outlined in **Table 1.5.3** and the assessor's knowledge of the Proposed Amendments. Specifically, for the assessment of residual impacts, mitigation measures are taken into account in determining the magnitude of change; and
- Comparison of the importance of the resource and magnitude of the impact (for both potential and residual) results in an assessment of the overall significance of the potential impact on the water resource receptor. Each identified impact (both potential and residual) will be classed as Major, Moderate, Minor or Negligible, Beneficial or Adverse significance.

1.15.21 Where other receptors and attributes are identified, professional judgement and available information will be used to determine their importance.

1.15.22 A qualitative comparison of the residual effects of the 2015 Proposed Development and the 2019 Proposed Amendments will be provided before and after mitigation is applied.

CUMULATIVE EFFECTS

1.15.23 Where relevant consideration will be given to the effects of the Proposed Amendments in combination with other developments identified in **Table 1.5.4** and **Figure 1.5.3** on the resulting effects of their interaction with the Proposed Amendments during both the construction and the operational periods.

1.16 ARCHAEOLOGY

SUMMARY OF BASELINE CONDITIONS

- 1.16.1 Part of the site lies within the Hackney South Shoreditch Archaeological Priority Area, and abuts the Fournier Street, Elder Street and Shoreditch High Street Conservation Areas. There are no scheduled monuments on the site.
- 1.16.2 In 2011, Museum of London Archaeology (MOLA) carried out a programme of archaeological and built heritage mitigation for the recently completed East London Line development. As a result of its location and historic development, the site has a low potential to contain archaeological remains of the prehistoric and early medieval periods. Prehistoric objects have been found during excavation of later features, but there was no evidence of their original context. No archaeological remains dated to the early medieval period have been found on site, and it seems probable that the site was in open fields during this period.
- 1.16.3 The investigations on the site demonstrate that the site has a high potential to contain archaeological remains of the Roman, later medieval and post-medieval periods. Evidence of all these periods has been recovered from the site, although material from the later medieval and post-medieval period is more prevalent and extensive than earlier remains. Some evidence of later medieval agricultural uses, including drainage works, and post-medieval brickmaking has been located. Extensive evidence of successive phases of post-medieval urbanisation has been recovered including well-preserved buildings, yards, roadways and associated pits and industrial features, with some elements being identifiable on early maps.
- 1.16.4 There is also the potential for significant early railway archaeology, including both listed and unlisted structures which survive below ground. They include well preserved remains of one of the Worlds first operational passenger railways – the Eastern Counties Railway of c 1840, and subsequent developments including the 1890s structures of the Bishopsgate Goods Yard, the major depot for produce supplying the London markets.

KEY ISSUES AND POTENTIAL LIKELY IMPACTS

- 1.16.5 Construction effects could arise from activities which remove, disturb or alter buried heritage assets, or their physical context/setting. This might include preliminary ground works, site set up, demolition and obstruction removal, landscaping, ground excavation for basements, foundations and ground remediation.
- 1.16.6 Additional ground disturbance during the operational (completed development)

phase is not anticipated, and operational effects are therefore unlikely for the historic environment topic, under the scope outlined below. Operational effects resulting from changes in the visual character or setting of above ground heritage assets, due to the presence of permanent, visible structures or modifications to existing structures, would be covered by the Townscape/Visual topic.

ASSESSMENT METHODOLOGY

- 1.16.7 An assessment will be undertaken of the historic environment. This comprises buried heritage assets, palaeoenvironmental deposits, and landscapes of heritage interest, including the physical context of heritage assets (buried remains which contribute to the understanding, appreciation and significance of a heritage asset). The visual setting and historic character of above ground heritage assets, for example the setting of individual listed buildings and conservation areas, and the way in which they are experienced, would be covered by the Townscape/Visual topic.
- 1.16.8 The specialist assessment would conform entirely to standards set by the Institute for Archaeologists and other professional guidance, along with local planning authority scoping guidance. It would:
- Quantify predicted buried heritage assets that may be affected by the Proposed Amendments;
 - Assess any previous impacts which may have affected asset survival;
 - Provide an evaluation of asset significance based on statutory designation, or in the absence of designation, professional judgement against values set out in English Heritage Conservation Principles (English Heritage 2008);
 - Assess development impacts and hence the significance of environmental effects arising from the proposals during the construction phase and operation/completed phase, including effects on the historic character and setting of buried heritage assets where relevant;
 - Provide recommendations for mitigation that would offset or eliminate any adverse effects;
 - Quantify any residual effects (those that might remain after mitigation) and cumulative and secondary effects. This would also consider residual effects on climate and climatic factors, where relevant to the historic environment topic.
- 1.16.9 The ES Addendum chapter for the historic environment will be supported by a fully illustrated technical appendix. This would include a detailed baseline compiled through a broad and standard range of data sources, including the Greater London Historic Environment Record, the English Heritage National Heritage List and National Record for the Historic Environment, the London Archaeological Archive and Resource Centre, and local authority data sources along with published works and cartographic sources, and geotechnical and

geoarchaeological data. The study would also include site walkover inspection.

- 1.16.10 In 2007, the MOLA Assessment Team carried out an EIA of the site (Bishopsgate Goods Yard: Associated Development Scheme). This incorporated the results of an archaeological evaluation by MOLA in 2006 for the East London Line development. The results of the latter was subsequently used to inform an archaeological mitigation strategy of targeted excavation and built heritage recording, which was carried out by MOLA in 2011 and the results subsequently published in a MOLA monograph (Dwyer E, 2011 The impact of the railways in the East End 1835–2010). The EIA for the current scheme would consult and update these earlier studies.
- 1.16.11 The baseline would put the Proposed Amendments into its full archaeological and historical context within and beyond the site, which may be affected by the Proposed Amendments. It would include an assessment of factors which may have compromised asset survival.
- 1.16.12 A qualitative comparison of the residual effects of the 2015 Proposed Development and the 2019 Proposed Amendments will be provided before and after mitigation is applied.

CUMULATIVE EFFECTS

- 1.16.13 Consideration will also be given to the cumulative effect of schemes identified within this scoping process (namely **Table 1.5.4** and **Figure 1.5.3**) on the resulting effects of their interaction with the Proposed Amendments.

1.17 TOWNSCAPE VISUAL IMPACT ASSESSMENT

SUMMARY OF BASELINE CONDITIONS

- 1.17.1 Part of the site is situated in the London View Management Framework Supplementary Planning Guidance (March 2012) which includes two protected vistas to St Pauls Cathedral (Protected Vistas 8A.1 and 9A.1) which impacts the site and the wider City Fringe Area.
- 1.17.2 The site is surrounded by 5 conservation areas: South Shoreditch, Fourier Street, Redchurch Street, Elder Street and the Boundary Estates. There are two Grade II listed structures on site: Braithwaite Viaduct, the Forecourt Wall and Gates to Goods Station. There are also 272 listed buildings in the vicinity of the site comprising of Grade I, Grade II and Grade II*.

TOWNSCAPE ASSESSMENT

- 1.17.3 An assessment will be made of the site and surrounding townscape in their existing states. This will be based on study of the historic development of the area with reference to relevant publications, and study of the present-day condition of the area based on site visits, study of maps and aerial photographs, and relevant publications.
- 1.17.4 This analysis will inform the division of the study area into townscape areas i.e. geographical areas which have readily identifiable characteristics in common. The impact of the Proposed Amendments on these townscape areas will then be assessed, based on conclusions drawn from the views analysis.

VISUAL ASSESSMENT

- 1.17.5 The study area for the visual assessment is centred on the site and limited to locations from which the site can be seen, or from which new buildings on the site have the potential to result in a significant visual impact at the height proposed.
- 1.17.6 Four principal types of viewing location are identified:
- Views that have been identified as significant, by LBH and LBTH or others, e.g. in relevant planning policy and guidance documents (including the London Plan LVMF) and conservation area appraisals;
 - Other locations or views of particular sensitivity, including those viewpoints

- in which the Proposed Amendments may significantly affect the settings of listed buildings and conservation areas;
- Representative townscape locations from which the Proposed Amendments will be visible; and
- Locations where there is extensive open space between the viewer and the Proposed Amendments so that it will be prominent rather than obscured by foreground buildings.

- 1.17.7 The set of viewpoints is chosen so that it covers:
- The range of points of the compass from which the Proposed Amendments will be visible;
 - A range of distances from the site; and
 - Different types of townscape area.
- 1.17.8 For the visual assessment, a total of 66 viewpoints have been selected, and agreed with the GLA, these are listed in **Table 1.16.1** and identified in **Figure 1.16.1 and 1.16.2**. The assessment will also consider any additional effects of the Proposed Amendments when considered in the context of consented cumulative schemes.

POTENTIAL EFFECTS

Likely Significant Effects

- 1.17.9 The change in form, function and massing of the site as a result of the Proposed Amendments has the potential to change the existing townscape receptors and views from visual receptors. As such, the TVIA will address the following likely significant effects:
- Temporary visual intrusion during the demolition and construction works on both the study area's townscape receptors and within the views from visual receptors;
 - Permanent effects arising from the completed Proposed Amendments on the townscape receptors of the site and its immediate context, along with the likely effects on the visual receptor's representative views. This effect is primarily associated with the height and mass of the Proposed Amendments new buildings;
 - Where appropriate, any mitigation measures that may be required in order to prevent, reduce or offset any likely significant adverse effects arising from the Proposed Amendments. Although it is considered that such measures will be incorporated as part of the design of the Proposed Amendments; and
 - Potential significant cumulative effects arising from the interaction of the Proposed Amendments to occur with other development proposals.

ASSESSMENT METHODOLOGY

- 1.17.10 The methodology for the townscape and visual impact assessment is based on the principles set out in the third (2013) edition of 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA), produced by the Landscape Institute with the Institute of Environmental Management and Assessment. Reference will also be made to national, regional and local guidance and policies. A brief overview of the methodology follows. A more detailed explanation will be provided as part of the TVIA.
- 1.17.11 Assessment of the effect of any proposed development on a receptor (an area of townscape or view) is made on the basis of professional judgement which takes into account relevant planning policies and guidance. It is based on the following method.
- 1.17.12 The sensitivity of the receptor as existing will be assessed as high, medium or low, depending on the importance, value and quality of the receptor, and its susceptibility to change, taking into account the quality of the receptor, and the nature and expectation of the viewer for views. The assessment of sensitivity takes into account the presence of any designated heritage assets (listed buildings, conservation areas, registered parks and gardens of special historic interest, world heritage sites) and non-designated heritage assets (locally listed buildings), and the amenity value of the viewing location and area in which it is located. The assessment of the sensitivity of the receptor under consideration is moderated to take into account a judgement about its quality in the round.
- 1.17.13 The magnitude of the change resulting from the Proposed Amendments will be assessed as major, moderate, minor or negligible according to the change to the receptor.
- 1.17.14 The magnitude of change and / or the sensitivity may be assessed as being at an intermediate point between the criteria set out above e.g. a change of 'moderate to major' magnitude.
- 1.17.15 These two measures (sensitivity and magnitude) are combined to provide a measure of the significance – major, moderate, minor or negligible – of the effect on the receptor which will result from the Proposed Amendments, the most significant effects being effects of major magnitude on receptors of high sensitivity. Significance levels may be assessed as being at an intermediate point between the criteria set out above e.g. 'minor to moderate' significance.
- 1.17.16 Effects are assessed as beneficial, adverse or neutral. 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 Amendments.
- 1.17.17 For each of the identified views in the assessment to be produced, there will be images of the view 'as existing' and 'as proposed'. 'As proposed' images are to be provided as 'Accurate Visual Representations' ('AVRs').
- 1.17.18 AVRs have been provided either as rendered (photorealistic) images or as 'wirelines' (diagrammatic representations showing the outline of the Proposed Amendments). Rendered and wireline images illustrate accurately the degree to which the Proposed Amendments would be visible, and its form in outline. Rendered images also show the detailed form and the proposed use of materials.
- 1.17.19 Where other developments in the wider area which are proposed or have been granted consent would be visible to a significant extent in the view, a further image showing these schemes together with the Proposed Amendments will be produced.
- 1.17.20 For each of the identified views, a description of the view as existing will be given, identifying its visual quality, sensitivity to change and reason for that sensitivity. A description of the view as proposed will then be given with an assessment, based on the method set out above, of the significance of the effect that the Proposed Amendments will have on the view. A further assessment will consider cumulative effects, if any, for each view ('as proposed with cumulative images will also be provided as AVRs). The approach to cumulative assessment for views and townscape will be to focus on the additional effects of the Proposed Amendments on top of the cumulative baseline.
- 1.17.21 The effect of the Proposed Amendments on townscape and visual receptors in its completed state will be considered during the design process, such that the design to be submitted will seek to avoid any unacceptable adverse impacts. Hoarding will be used during the demolition and construction process, providing some screening of these unsightly activities.
- 1.17.22 The residual effects on the Proposed Amendments during both the construction and operation will be presented within the chapter.
- 1.17.23 A qualitative comparison of the residual effects of the 2015 Proposed Development and the 2019 Proposed Amendments will be provided before and after mitigation is applied.

CUMULATIVE EFFECTS

- 1.17.24 Consideration will also be given to the cumulative effect of schemes identified within this scoping process (namely **Table 1.5.4** and **Figure 1.5.3**) on the resulting effects of their interaction with the Proposed Amendments on the townscape receptors and visual receptor's representative views during both the construction and the operational periods.

Table 1.17.1: Visual Impact Assessment View Point Locations

View	Location
1	Alexandra Palace: the viewing terrace – south western section [LVMF 1A.1]
2	Parliament Hill: the summit - looking toward St Paul's Cathedral [LVMF 2A.1]
3	Kenwood: the viewing gazebo - in front of the orientation board [LVMF 3A.1]
4	Primrose Hill: the summit – looking St Paul's Cathedral [LVMF 4A.1]
5	Greenwich Park: the General Wolfe statue - at the orientation board [LVMF 5A.1]
6	Blackheath Point - near the orientation board [LVMF 6A.1]
8	King Henry VIII's Mound - the viewing point [LVMF 9A.1]
9w	Tower Bridge: the North Bastion [LVMF 10A.1] - Winter
10	Tower Bridge: upstream - the south Bastion
10n	Tower Bridge: upstream – the South Bastion: Night
10a	Tower Bridge: upstream - the south Bastion - Alternative
10b	Tower of London - North Wall Walk
11	Waterloo Bridge Downstream: close to the Westminster bank [LVMF 15B.1]
12	Waterloo Bridge: downstream - at the centre of the bridge [LVMF 15B.2]
13	Waterloo Bridge: the downstream pavement – Lambeth Bank
14	The South Bank: moving from National Theatre to Gabriel's Wharf

View	Location
17	Golden Jubilee/Hungerford Footbridges: downstream - crossing the Westminster bank [LVMF 17B.1]
18	Golden Jubilee/Hungerford Footbridges: downstream - close to the Westminster bank [LVMF 17B.2]
19	The Queen's Walk at City Hall – foot of pathway from Potter's Field [LVMF 25A.1]
20	The Queen's Walk at City Hall - in front of the public terraces [LVMF 25A.2]
21	The Queen's Walk at City Hall - close to Tower Bridge [LVMF 25A.3]
24	Paul Street: junction with Epworth Street
25	City Road: opposite Cayton Street
26s	Great Eastern Street: traffic island at junction with Old Street Summer
26w	Great Eastern Street: traffic island at junction with Old Street Winter
27	Great Eastern Street: junction with Curtain Road
28	Great Eastern Street / Fairchild Street
29	Southern end of Kingsland Road
30	Shoreditch High Street: junction with Rivington Street
31	Shoreditch High Street: junction with Bateman Row: Night
32s	Arnold Circus Roundabout: Boundary Gardens, southern steps Summer
32w	Arnold Circus Roundabout: Boundary Gardens, southern steps Winter

View	Location
33	Circus along Club Row Winter
34	Old Nichol Street / Chance Street
35	Shoreditch High Street, west side opposite Redchurch Street
36	Bethnal Green Road: junction with Chilton Street
36n	Bethnal Green Road: junction with Chilton Street Night
37	Hereford Street: junction with Sale Street
38	Weavers Field
39	Cheshire Street / St Matthew's Row
40	Bethnal Green Road near to Club Row
41	Allen Gardens
42	Woodseer Street / Deal Street
43	Commercial Street: junction with Hanbury Street
43n	Commercial Street: junction with Hanbury Street Night
44	Commercial Street close to Whites Row
46	Commercial Street close to Wheler Street
47	Bishopsgate outside entrance to Liverpool Street Station
48	Old Spitalfields Market / Brushfield Street

View	Location
49	Folgate Street on axis of Elder Street
49n	Folgate Street on axis of Elder Street Night
50	Norton Folgate: junction with Primrose Street
51n	Norton Folgate: opposite junction with Fleur de Lis Street: Night
52	Brick Lane / Bethnal Green Road
53	Hanbury Street looking north along Corbet Place / Grey Eagle Street
54	Brick Lane / Brewery
55	Kingsland Road - canal bridge
56s	Geffrye Museum: Summer
56w	Geffrye Museum: Winter
58	Rear of Shoreditch Church
59	Worship Street
60	Blossom Street
61	Quaker Street
62	Quaker Street junction with Commercial Street
63	Commercial Street / Shoreditch High Street
64	Commercial Street / Fleur De Lis Street

Fig 1.17.1: Visual Impact Assessment View Points

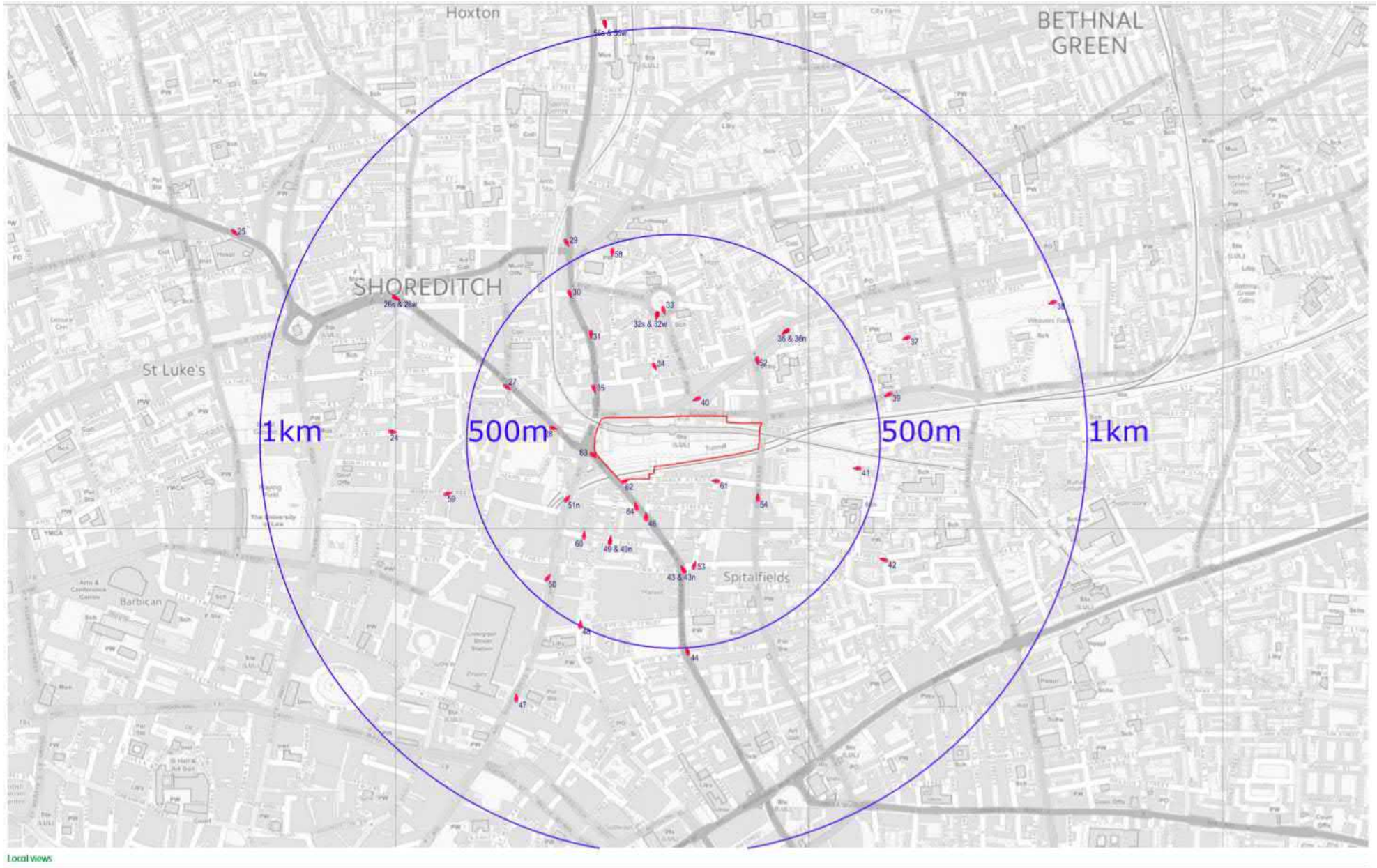


Fig 1.16.2 Visual Impact Assessment View Points



1.18 BUILT HERITAGE

SUMMARY OF BASELINE CONDITIONS

- 1.18.1 There are numerous designated and non-designated heritage assets within the site and within its vicinity, indicating that the Proposed Amendments has the potential to affect their heritage significance and heritage setting of the surrounding area.
- 1.18.2 There are two Grade II listed structures on-site, the Braithwaite Viaduct and the Forecourt Wall and Gates to Goods Station.

KEY ISSUES AND POTENTIAL LIKELY IMPACTS

- 1.18.3 The Proposed Amendments will have an impact upon the physical characteristics both of the site itself and its surroundings.
- 1.18.4 There are likely to be views of construction machinery during the construction phase and of residential, commercial and office buildings during operation.
- 1.18.5 There are likely to be positive impacts on the local townscape character as a result of an enhanced townscape and sense of place.
- 1.18.6 The significance of designated and non-designated heritage assets within the site has the potential to be affected by aspects of the Proposed Amendments. These include the grade II listed Former Forecourt Wall and Gates to the Old Bishopsgate Goods Station and the grade II listed Braithwaite Viaduct. Similarly, listed buildings outside the site also have the potential to be affected and these will be identified in due course.
- 1.18.7 Given the proposed form of development, the Proposed Amendments are likely to be visible from a large area and while that area is yet to be determined it is likely that a number of heritage assets could be affected.
- 1.18.8 There are a number of conservation areas in the close proximity to the site and further afield as listed in **Table 1.17.1**.
- 1.18.9 The effect of the Proposed Amendments on the Tower of London World Heritage Site will also be considered, as will any effects or otherwise on protected views of St Paul's Cathedral.
- 1.18.10 It is proposed to work in consultation with the London Borough of Hackney, London Borough of Tower Hamlets and Historic England (and any other relevant stakeholders) in identifying any additional potential designated and non-designated heritage assets that may be affected by the proposed scheme. The

full list of relevant heritage assets will be compiled in due course once the geographical scope of the scheme's potential impacts has been identified.

Table 1.18.1: Conservation Areas in the Vicinity of the Site

Borough	Conservation Area
London Borough of Tower Hamlets	Elder Street Fournier Street Redchurch Street Boundary Estate Hackney Road Artillery Passage Wentworth Street Jesus Hospital Estate
London Borough of Hackney	South Shoreditch Sun Street Hackney Road Hoxton Street Kingsland
City of London	Finsbury Circus New Broad Street Bishopsgate St Helen's Place Bank
London Borough of Islington	Moorfields and Bunhill Field Finsbury Square

ASSESSMENT METHODOLOGY

- 1.18.11 Using work undertaken for earlier proposals for the site, an updated assessment will be made of the existing listed structures/buildings on-site to determine the level of significance of each of the structures in their current form. This work will be informed by historic research into the development of the site in its context and by an appraisal of the existing structures.
- 1.18.12 The work will also include an assessment of unlisted but historic structures within the site including elements of the boundary wall that form part of the Fournier Street Conservation Area. The assessment will include the unlisted former chapel and weavers' houses on the south side of Sclater Street abutting the Goods Yard boundary.

- 1.18.13 Heritage receptors outside of the site will be identified. While the zone of visual impact of the proposed scheme is yet to be defined, the current significance, value, character and appearance of nearby designated and non-designated heritage assets will be considered as part of the analysis of existing baseline conditions.
- 1.18.14 Assessment of the effect of any proposed development on a heritage receptor is made on the basis of professional judgement which takes into account relevant planning policies and guidance. It is based on the following method:
- The sensitivity of the heritage receptor as existing will be assessed as high, medium or low, depending on the importance, value and quality of the receptor and its setting. The assessment takes into account the setting of relevant listed buildings, important locally listed buildings and on relevant conservation areas. The assessment of the sensitivity of the receptor under consideration is moderated to take into account a judgement about its quality in the round.
 - The magnitude of the change resulting from the Proposed Amendments will be assessed as major, moderate, minor or negligible according to the change to the heritage asset's setting and value.
 - These two measures are combined to provide a measure of the significance – major, moderate or minor - of the effect on the heritage receptor which will result from the Proposed Amendments, the most significant effects being effects of major magnitude on receptors of high sensitivity. Effects are assessed as beneficial, adverse, or neutral. The assessment as beneficial or adverse is a 'net equation', since with regard to the heritage receptor that is being assessed there may be both positive and negative effects as a result of the development.
- 1.18.15 A qualitative comparison of the residual effects of the 2015 Proposed Development and the 2019 Proposed Amendments will be provided before and after mitigation is applied.

CUMULATIVE EFFECTS

- 1.18.16 Consideration will also be given to the cumulative effect of schemes identified within this scoping process (namely **Table 1.5.4** and **Figure 1.5.3**) on the resulting effects of their interaction with the Proposed Amendments on the heritage receptors and heritage receptor's representative views during both the construction and the operational periods.

1.19 ECOLOGY

SUMMARY OF BASELINE CONDITIONS

- 1.19.1 No statutory designated sites were identified within 2 km of the site boundary. Six Sites of Importance for Nature Conservation (SINCs) were recorded within 1 km of the site boundary.
- 1.19.2 The habitat on-site is varied, consisting of scattered trees, scrub, ephemeral/short perennial vegetation, bare ground, hardstanding, and buildings and walls. Japanese knotweed has been recorded within the upper level of site. Therefore, the site has the potential to support a number of species, as detailed below:
- In 2017 common pipistrelle, soprano pipistrelle and Nathusius' pipistrelle bats were recorded during activity surveys and automated detector surveys. The arches to the east of Braithwaite Street have moderate suitability to support roosting bats, however, no bats were recorded during emergence surveys undertaken in 2017.
 - In 2013 a single sub-adult black redstart was recorded within the site, but no singing or breeding activity was recorded. No black redstart were recorded in 2017.
 - Invertebrate surveys have identified a total of 58 species of invertebrate, including nine noteworthy species that are typical of urban brownfield sites. The site is assessed as having a medium biodiversity interest for this species group.
 - Surveys in 2013 confirmed the likely absence of common reptile species on the site and given the isolation of the site from suitable habitat, this assessment was retained during the 2017/2018 assessment.

KEY ISSUES AND POTENTIAL LIKELY IMPACTS

- 1.19.3 The potential receptors of impacts from the Proposed Amendments are as follows:
- Six SINCs are located within 1 km of the site boundary.
 - The Open Mosaic Habitat on Previously Developed Land (OMHPDL) present on site (UK Biodiversity Action Plan Priority Habitat).
 - At least three species of bats which have used the site as a foraging route.

- A range of common birds, for which the habitat on-site provides suitable nesting areas.
- Invertebrates typical to urban brownfield sites.

ASSESSMENT METHODOLOGY

- 1.19.4 The impact of the Proposed Amendments on ecological features and attributes will be assessed in accordance with Chartered Institute of Ecology and Environmental Management (CIEEM) guidelines for Ecological Impact Assessment (EclA)²².
- 1.19.5 In accordance with the CIEEM EclA guidelines, the zone of influence of the Proposed Amendments, i.e. the area over which ecological effects may occur, will be established. Secondly, the ecological features identified will be assigned an importance. Thirdly, the impacts of the Proposed Amendments will be predicted taking into account the different stages and activities in the development process. The significance of the identified impacts will then be assessed. An assessment of the cumulative effects associated with the Proposed Amendments in combination with other developments within 1 km of the site will also be undertaken.
- 1.19.6 A qualitative comparison of the residual effects of the 2015 Proposed Development and the 2019 Proposed Amendments will be provided before and after mitigation is applied.

CUMULATIVE EFFECTS

- 1.19.7 In line with the committed developments identified in **Table 1.5.4** and **Figure 1.5.3** the future development traffic flows will be calculated and assessed for their cumulative effects on noise at the identified receptors surrounding the Proposed Amendments.

²² CIEEM (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

1.20 CLIMATE CHANGE MITIGATION AND ADAPTATION

- 1.20.1 The EIA Regulations 2017 have introduced the requirement to consider climate as part of the EIA process, and require a consideration of ‘the impact of the project on climate’ and ‘the vulnerability of the project to climate change’ (Schedule 4, paragraph 5(f)). This assessment therefore considers climate change impacts from both:
- A project’s increase or decrease in greenhouse gas (GHG) (and principally carbon dioxide (CO₂)) emissions (i.e. climate change mitigation); and
 - The way in which a changing climate can alter the environmental conditions, leading to potential changes in the assessments of some topics (i.e. climate change resilience/adaptation).

SUMMARY OF BASELINE CONDITIONS

- 1.20.2 The site is subject to climatic conditions as are currently observed.
- 1.20.3 The site is also currently undeveloped, and therefore baseline GHG emissions are considered to be negligible.

KEY ISSUES AND POTENTIAL LIKELY IMPACTS

Climate Change Mitigation

- 1.20.4 The approach to assessing the potential impact of the Proposed Amendments on climate will follow the Institute of Environmental Management and Assessment (IEMA) guidance ‘Assessing Greenhouse Gas Emissions and Evaluating Their Significance’ (2017)²³. This guidance describes how a proportionate assessment of a development’s potential impact on climate can be achieved and how to communicate the results in terms of a notional percentage contribution relative to a carbon budget, accounting for achievable mitigation.
- 1.20.5 The IEMA guidance states that it is good practice for greenhouse gas (GHG)

emissions to be scoped into all EIA projects, on the basis of principles highlighting that all GHG emissions contribute to climate change, and that the cumulative effect of all GHG emissions moves us towards the scientifically defined environmental threshold for limiting temperature increases associated with climate change. Climate change can also have a potentially significant effect on many EIA topics. As there are no defined thresholds or significance criteria currently, any GHG emissions or reductions from a project should be considered as significant. The guidance also reinforces a key principle of EIA which is to reduce the impact of a project’s emissions through mitigation.

Climate Change Adaptation

- 1.20.6 The aim of the assessment will be to consider whether the effect on receptors that are sensitive to climate in the existing situation are likely to be different under a future climate which is different to that now. It is important to understand whether the potential impacts of/upon the proposed development could manifest themselves differently (or be better or worse) under a future baseline, if this could change the significance of effects in the future, and if so, how should the scheme futureproof itself or plan for adaptation.
- 1.20.7 IEMA’s guidance ‘Climate Change Resilience and Adaption’ (2015)²⁴ presents a methodology for the consideration of climate change resilience and adaption in the EIA process, which will be followed in the EIA.
- 1.20.8 The first stage of the assessment is to select a future climate scenario to base the assessment on. This is determined by reviewing the future climate projections published by the Met Office (through the UK Climate Projections (UKPC18) website)²⁵, which includes variables such as annual mean temperatures and annual changes in summer and winter precipitation.
- 1.20.9 In the case of the Proposed Amendments, it is proposed that the ‘medium emissions scenario’ (A1B) for the 2080s will be utilised as the future baseline, as this gives a more likely set of projections, given known trends and technological developments. The 2080s covers the years 2070 – 2099 and this is the timeframe considered most relevant to the proposed development, due to its anticipated design life. A range of probability levels are available, although this study will use the 50% probability level (i.e. a central estimate with less uncertainty).

²³ IEMA (2017), *Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating Their Significance*

²⁴ IEMA (2015), *Guidance ‘Climate Change Resilience and Adaption’*

²⁵ Met Office (2018), *Download UKCP18 data*, web link: <https://www.metoffice.gov.uk/research/collaboration/ukcp/download-data>

SUMMARY OF BASELINE CONDITIONS

1.20.10 The site is currently undeveloped. Baseline greenhouse gas (GHG) emissions are therefore considered to be nil.

KEY ISSUES AND POTENTIAL LIKELY IMPACTS

1.20.11 Projected changes to average climatic conditions, as a result of climate change, and an increased frequency and severity of extreme weather events (such as heavy and / or prolonged precipitation, storm events and heatwaves) have the potential to impact the ability of the surrounding natural environment to adapt to climate change. The key parameters of climate change are: changing temperature, changing rainfall quantities and frequency, wind strength and sea level rise.

1.20.12 The main in-combination impact of the climate change parameters and the Proposed Amendments are considered to be sea level rise changing rainfall quantities and frequency. The potential for increase in surface water run-off and drainage will also be considered. Mitigation measures to reduce the impacts identified will be developed as part of the assessment of flood risk and drainage. To minimise impacts, a number of general adaptation measures will be considered including: selection of climate resilient construction materials, on-site attenuation to minimise the impact on the local drainage network and incorporation of Sustainable Urban Drainage Systems (SuDS) into the design. Future impacts of climate for drainage and flooding will be considered as part of the FRA to be submitted with the ES.

1.20.13 With regard to the production of GHG emissions, the Proposed Amendments will inevitably contribute to the production of CO² in both construction and operation. However existing UK regulations such as the Building Regulations Part L conservation of fuel and power, will ensure that the Proposed Amendments (at a minimum) maximises energy efficiency through building fabric, electricity and heat production therefore reducing the production of CO².

The production and impact of GHG emissions associated with the Proposed Amendments will be considered within the climate change chapter of the ES Addendum.

ASSESSMENT METHODOLOGY

1.20.14 The following assessment methodology is proposed:

- Identification of receptors: GHG emissions ultimately affect the global climate, and thus the global climate as a whole will be considered as a receptor.
- Determination of the baseline: Baseline GHG emissions will be calculated based on existing activities at the site.
- Prediction methodology: The assessment will use a life cycle approach to calculate GHG emissions. The approach will be consistent with the principles set out in IEMA guidance²⁶. It is further detailed below.

Prediction Methodology

1.20.15 The geographic scope of assessment will include the red-line boundary of the site, embodied GHG emissions from materials used to build the Proposed Amendments and GHG emissions from the transport of materials and people associated with the site.

1.20.16 Calculation of emissions will account for, where possible, seven Kyoto Protocol GHGs. Emissions will be calculated from activity data multiplied by the relevant emissions factor.

1.20.17 Primary emissions sources associated with each of the following lifecycle stages of the Proposed Amendments will be considered:

- pre-construction;
- product;
- construction;
- operation; and,
- end of life.

1.20.18 The impact of emissions from the Proposed Amendments will be determined by comparing GHG emissions associated with the Proposed Amendments during its proposed design life against relevant UK carbon budgets. The UK carbon budget is in place to limit the amount of GHG emissions the UK can legally emit in a five-year period, the amount of which decreases with each new budget period²⁷. Any

²⁶ IEMA (2017), *Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating Their Significance*

²⁷ Department for Business, Energy and Industrial Strategy, Carbon Budgets, Web Link: <https://www.gov.uk/guidance/carbon-budgets> (Accessed on 20/08/2018)

source of emissions contributing to the UK's carbon budget will therefore have an increased impact on the future carbon budget.

CUMULATIVE EFFECTS

- 1.20.19 Cumulative effects are the combined effects of several development schemes (in conjunction with the Proposed Amendments) which may, on an individual basis be insignificant but, cumulatively, have a significant effect.
- 1.20.20 Since GHG emissions have global impacts, there will be localised cumulative effects. Other schemes, in combination with the Proposed Amendments, also have the potential to impact on government's ability to meet its carbon budgets.
- 1.20.21 During construction, other committed developments will require large amounts of construction materials, transport and on-site fuel use. All of these will generate GHG emissions that will be significant.

1.21 NON-SIGNIFICANT TOPICS

1.21.1 The 2013 Scoping Report provided by the Applicant and subsequent Scoping Opinion (2014) provided by LBTH and LBH (Appendix 1), were in agreement that the following topics were not considered to have the potential for significant environmental effects to arise from impacts associated with the Proposed Development and could therefore be 'scoped out' of the main assessment:

- Aviation; and
- Human Health and Wellbeing.

1.21.2 This is still applicable for ES Addendum however the justification has been updated to take in account the Proposed Amendments and is provided below. Additionally, it is now the intention in line with GLA policy that a rapid Health Impact Assessment (rHIA) will be produced and submitted in support of the applications. Key details of this will be fed into the Socio- Economics ES Addendum chapter so as to reflect this.

1.21.3 Due to the reduction in height of the buildings associated with the Proposed Amendments the effects associated with Electronic Interference are no longer considered to be significant and therefore have also been scoped out of the ES Addendum with the provision that the proposed mitigation outlined in the 2015 ES is implemented. Please see the relevant section below for further details.

1.21.4 As outlined in the introduction, whilst it is accepted that the application falls under the 2011 EIA Regulations the Applicant has, in the interests of best practice and robustness, prepared this Scoping Review Report to incorporate the requirements of the 2017 EIA Regulations which go over and above those in the 2011 EIA Regulations. Therefore, in addition to the subjects outlined above the 2017 EIA Regulations also includes the assessment of major accidents and / or natural disasters. This has been 'scoped out' of the ES Addendum and is justified in the relevant section below.

AVIATION

1.21.5 The site is located approximately 24 km east of London Heathrow Airport (LHR) and approximately 8 km west of London City Airport (LCY). As the site is located a significant distance away from London Heathrow Airport, it can be concluded that there will be no likely adverse impacts on operations at London Heathrow Airport as a result of the Proposed Amendments, and as such, this will not be considered further within this EIA Scoping Report or within the ES itself.

1.21.6 It is understood that LCY is designated as an 'officially safeguarded aerodrome' in accordance with the Office of the Deputy Prime Minister (ODPM) Circular

1/2003: Safeguarding Aerodromes. Precise and integrated airspace management procedures are necessary to maintain safety and efficiency.

1.21.7 This requires the operations of LCY traffic to be at altitudes below LHR traffic. The international aviation criteria require a 1000 feet (ft) (or 304.8m) obstacle clearance in the central London area (including construction cranes). The height of the tallest element of the Proposed Amendments will be circa AOD + 139 m. With regards to physical safeguarding, the Take Off and Climb Surface (TOC) and the Approach Surface (APP) begin on the airfield with different origins and rise at different angles relative to the airport.

1.21.8 The Proposed Amendments will sit below the TOC for LCY, thus there is no penetration of the TOC Surface, and so the Proposed Amendments are clear of the safeguarding distances for LCY. The Proposed Amendments are therefore not anticipated to affect the current use of approach and/or departure procedures for LCY.

1.21.9 The Proposed Amendments are considered unlikely to have any significant effects on aviation and therefore in line with the EIA Regulations it has been scoped out of the ES Addendum.

ELECTRONIC INTERFERENCE

1.21.10 Interference to certain telecommunications systems (e.g. television (TV), mobile phone and radio) can arise from buildings physically blocking and absorbing associated signals. Therefore, a loss or degradation of the reception of such systems can result from the introduction of new buildings and is often referred to as 'electronic interference', with the affected area referred to as the 'shadow area'.

Radio Signals

1.21.11 Due to radio signals being at lower frequencies, they can 'bend' to a greater extent around buildings (or other obstructions) when compared to TV signals. Radios are also able to make constructive use of reflected signals. As such, radio signals are able to operate successfully in dense urban settings (i.e. containing a large density of tall and large buildings) and therefore radio reception (both analogue and digital) is not considered to be at risk of degradation as a result of the Proposed Amendments. No likely significant effects to radio reception (both analogue and digital) are therefore anticipated as a result of the Proposed Amendments.

Mobile Phone Reception

1.21.12 A review of Ofcom's mobile availability checker² has identified that both 3G and 4G mobile services for four network providers (EE, O2, Vodafone and Three)

are available within and in close proximity to the site. A search of the Mast Data database³ identified one Orange UTMS mast currently present on-site. This will need to be relocated by the network provider prior to demolition works commencing on-site, and is the responsibility of the provider.

1.21.13 There are no off-site mobile phone masts within close proximity to the site boundary (i.e. within ~3-5 metres of a proposed building), as a result, it is considered that there is no risk of degradation to mobile phone reception as a result of the Proposed Amendments (note: mobile phone signals can travel through buildings, and unless a proposed building is in very close proximity to a mast, and significantly overshadows it, effects on mobile phone reception are negligible).

1.21.14 No likely significant effects to mobile phone reception are therefore anticipated as a result of the Proposed Amendments.

Terrestrial TV Reception

1.21.15 Terrestrial (land based) TV signals are transmitted in digital format (Digital Terrestrial TV (DTTV) i.e. Freeview). The site receives DTTV signals from the Crystal Palace transmitter mast, located approximately 11 km directly south of the site, any resultant DTTV shadow areas will therefore be located directly north of the site.

1.21.16 The closest relay transmitter mast is the 'Poplar' relay transmitter mast, which is located approximately 3.5 km to the west of the site. It is considered that the Proposed Amendments would not affect the reception of services transmitted by this relay transmitter mast, and no likely significant effects to DTTV services received from the 'Poplar' relay transmitter mast is anticipated as a result of the Proposed Amendments.

1.21.17 With regards to determining the potential effects of the Proposed Amendments on DTTV reception received by residential dwellings, and transmitted by the Crystal Palace transmitter mast, the design information relating to the Proposed Amendments has been reviewed. In general, the longer DTTV shadows are generated from the height of Building 1 (outline) and Building 2 (detailed) of the Proposed Amendments, as a result, the longer DTTV shadows will fall from the buildings within the western portion of the site, there are unlikely any shadows falling from the buildings on the eastern side of the site as they are of similar heights to the surrounding buildings.

1.21.18 The DTTV shadow generated as a result of the Proposed Amendments is anticipated to fall to the north of the site for approximately 700 metres at its longest point, predominantly falling over a number of residential and commercial dwellings to the north of the site.

1.21.19 It should be noted that a DTTV shadow cast by a building/obstruction diminishes with distance as a result of 'knife-edge diffraction'. This diffraction mechanism is

a process whereby signals appear to bend (or 'diffract') behind a structure and eventually meet, like that of a knife-edge as opposed to a straight block. The most noticeably adverse effects are experienced by residential dwellings located in close proximity to the site, with the magnitude of the impact reducing with distance away from the site. Therefore, the adverse effects experienced further away from the site are lesser than those close to the site.

1.21.20 The 2015 ES outlined that the Proposed Development had the potential to affect up to 14 terrestrial aerials this number affected is likely to be reduced due to the change in heights associated with the Proposed Amendments however the following mitigation measures were suggested to mitigate the potential effects:

- upgrading the existing DTTV aerials by increasing their height and gain;
- the provision of a non-subscription satellite service which is available from the BBC and ITV ('Freesat') or Sky for a one-off cost; or
- linking affected residential dwellings up to the existing available CATV network at a one-off cost.

1.21.21 These standard measures would still be applicable to the Proposed Amendments and are straight forward to implement and would remove any adverse effects to DTTV reception, however as effects experience on DTTV reception are likely to be unnoticeable, it is not considered that mitigation of any adverse effects will be necessary.

1.21.22 Satellite TV services to the UK are provided by geo-stationary satellites, which are primarily located within the Astra 28.2oE satellite cluster. Due to the geostationary positioning of the satellites in relation to London, satellite TV shadow areas will fall to the northwest of the site.

1.21.23 Based on the information available, it can be concluded that there is no potential for adverse effects on radio signals and mobile phone reception. However, there is a slight potential for a loss or degradation to DTTV reception received by residential dwellings as a result of the Proposed Amendments. Suitable mitigation measures have been identified and are potentially available to all affected residential dwellings.

1.21.24 Whilst there is the potential for some impact to occur, taking into account the size and extent of potential impacts and the availability of standard measures to monitor and remedy potential impacts, the likely residual effects on DTTV reception to surrounding receptors are not considered to be significant, and therefore this has been scoped out of the ES Addendum.

POPULATION AND HUMAN HEALTH

1.21.25 Health is influenced by many factors, including age, gender, ethnicity, education, employment, income, social networks, air, water quality, contaminated land and

- access to social and public health services.
- 1.21.26 It is not considered that the Proposed Amendments comprises uses or activities or is located within the vicinity of any activities or uses that would pose a significant risk to human health.
- 1.21.27 The human health implications of the Proposed Amendments will be assessed and presented within the specific technical chapter within the ES Addendum such as noise, air quality, water resources, microclimatic effects of wind, contact with contaminated land / material or access to local facilities (e.g. GPs, school availability or open space). A table will be provided in the introductory sections of the ES Addendum sign posting where within the ES Addendum these topics are addressed.
- 1.21.28 There may be significant beneficial health effects resulting from the development of high-quality residential properties and the large area of public realm. There will also be beneficial effects on the population due to the increase in employment during construction and commercial and retail employment during operational phases of the Proposed Amendments. The increased population may result in minor adverse effects to the local population with respect to access to public health services and pressure on vulnerable groups as the introduction of additional residential properties may increase the number of users of the public health services. However, these effects are not expected to be significant, and where required contributions to the local authority in the form of the Community Infrastructure Levy (CIL) will be considered sufficient to mitigate any adverse effect.
- 1.21.29 The Application will also be supported by a rapid Health Impact Assessment (rHIA) in accordance with GLA policy.
- 1.21.30 On this basis it is considered that the likely effects on human health will be adequately assessed within other applicable areas of the ES Addendum and the Application and therefore it is not deemed necessary to provide a stand alone chapter.

MAJOR ACCIDENTS AND OR NATURAL DISASTERS

- 1.21.31 Under Schedule 3 of the 2017 EIA Regulations, the risks of major accidents and natural disasters relevant to the Proposed Amendments requires consideration in line with our approach the following section has been prepared.
- 1.21.32 The Proposed Amendments would introduce residential and commercial properties into an area which currently supports similar land uses.
- 1.21.33 No structural, geomorphological or geochemical features are recorded on or near the site by BGS mapping. The site is not in an area that could be affected by coal or metalliferous mining activity and there are no Health and Safety Executive (HSE) Control of Major Accident Hazards (COMAH) sites in close proximity to the

site. Therefore, the Proposed Amendments are not likely to produce an elevated risk of accidents or natural disasters.

- 1.21.34 The CoCP will be prepared by the Applicant prior to the construction stage of the Proposed Amendments, this will include all proposed construction mitigation measures.
- 1.21.35 The design of the Proposed Amendments is in accordance with industry standards including drainage and building regulations to reduce the potential for accidents and natural disasters to impact on the Proposed Amendments. A Flood Risk Assessment will also be prepared, and this will assess the potential impacts and effects related to flood risk at the Proposed Amendments.
- 1.21.36 The ES Addendum will also include a table sign posting where the potential for accidents and disasters have been addressed within the application.
- 1.21.37 In consideration of the above, there are not likely significant effects from major accidents and natural disasters and therefore this has been scoped out of the ES Addendum.

1.22 PROPOSED STRUCTURE OF THE ES ADDENDUM

STRUCTURE OF THE ASSESSMENT CHAPTERS

- 1.22.1 The proposed standardised structure for the individual assessment chapters is as follows:
- Scope of Assessment
 - Key Legislation, Policy and Guidance Considerations
 - Legislation and Regulations
 - Planning Policy
 - Technical Standards and Guidance
 - Assessment Methodology
 - Determination of the Baseline
 - Prediction Methodology
 - Limitations and Assumptions
 - Baseline Assessment and Identification of Key Receptors
 - Baseline Assessment
 - Conclusions Regarding Baseline Environmental Quality and Key Receptors
 - Identification and Description of Changes Likely to Generate Effects
 - Construction Phase
 - Operational Phase
 - Assessment of Likely Significant Effect
 - Embedded Construction Mitigation Measures
 - Anticipated Effects During the Construction Phase
 - Embedded Operational Mitigation Measures
 - Anticipated Effects During the Operational Phase
 - Scope for Additional Mitigation Measures
 - Potential Additional Mitigation Measures
 - Likely Effectiveness of Additional Mitigation Measures
 - Residual Effects
 - Significant Residual Effects
 - Comparison of Residual Effects with the 2015 Proposed Development
 - Cumulative Effects
 - Summary and Conclusion

STRUCTURE OF THE ES ADDENDUM

- 1.22.2 The ES Addendum will comprise the following set of documents:
- ES ADDENDUM Volume I: Non-Technical Summary NTS: this document will provide a concise summary of the Proposed Amendments, alternative designs that were considered, environmental impacts and mitigation measures;
 - ES ADDENDUM Volume II: Main Text: this will contain the main body of the EIA with the proposed chapter headings as set out below;
 - ES ADDENDUM Volume III: Townscape, Visual Impact Assessment (TVIA): the methodology and findings of the TVIA accompanied by a full set of views and verified images;
 - ES ADDENDUM Volume IV: Technical Appendices: these will provide supplementary details of the environmental studies conducted during the EIA including relevant data tables, figures and photographs; and
 - ES ADDENDUM Volume V: Technical Annexes: supporting documents upon which the ES Addendum draws key information to support the EIA.
- 1.22.3 It is currently envisaged that the ES Addendum Volume II: Main Text will be structured with the following chapter headings:
- Chapter 1: Introduction;
 - Chapter 2: The Site;
 - Chapter 3: EIA Methodology;
 - Chapter 4: Alternatives Considered and Design Evolution;
 - Chapter 5: The Proposed Amendments and Construction Overview;
 - Chapter 6: Waste and Recycling;
 - Chapter 7: Socio Economics;
 - Chapter 8: Ground Conditions;
 - Chapter 9: Traffic and Transport;
 - Chapter 10: Wind Microclimate;
 - Chapter 11: Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution;
 - Chapter 12: Air Quality;
 - Chapter 13: Noise and Vibration;
 - Chapter 14: Water Resources and Flood Risk;
 - Chapter 15: Archaeology;
 - Chapter 16: Built Heritage;
 - Chapter 17: Ecology;
 - Chapter 18: Climate Change Mitigation and Adaptation;
 - Chapter 19: Effect Interactions;
 - Chapter 20: Residual Effects and Conclusions; and
 - Chapter 21: The Limited Development Scenario.

1.23 SUMMARY OF PROPOSED EIA / ES SCOPE

1.23.1 As set out in this Scoping Review Report, the following environmental topics are proposed for consideration within Volume II of the ES Addendum:

- Waste and Recycling;
- Socio Economics;
- Ground Conditions;
- Traffic and Transport;
- Wind Microclimate;
- Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution;
- Air Quality;
- Noise and Vibration;
- Water Resources and Flood Risk;
- Archaeology;
- Built Heritage;
- Ecology; and
- Climate Change Mitigation and Adaptation.

1.23.2 There will also be the following related stand-alone documents submitted as part of the planning application:

- Development Specification;
- Design and Access Statement (including Design Guidelines;
- Planning Statement (including Leasing Prognosis and Marketing Strategy and Retail Management Strategy);
- Transport Assessment;
- Regeneration Statement;
- Masterplan Sustainability Statement;
- Masterplan Energy Strategy;
- Retail Assessment;
- Affordable Housing Statement;
- Heritage Statement;
- Operational Waste Strategy;
- Statement of Community Involvement;
- Rapid Health Impact Assessment;
- Utilities and Services Statement; and
- Structural Engineering Condition Survey.

1.23.3 In line with the GLA's letter (ref: D&P/1200c&d/PR) dated the 21st December 2018 we have provided this review report on behalf of the Applicant to outline the revisions or additions that we consider are required to address the likely significant effects on the environment arising from the development as proposed to be amended. This report requests a Review of the Scoping Opinion from the GLA pursuant to Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

1.23.4 The GLA and consultees are invited to consider the contents of this Report and comment accordingly within the five-week period prescribed by the EIA Regulations.

APPENDIX 1: 2014 SCOPING REPORT AND SCOPING OPINION

URS

Bishopsgate Goods Yard

EIA Scoping Report

January 2014

47067352

Prepared for:

Bishopsgate Goods Yard
Regeneration Ltd

UNITED
KINGDOM &
IRELAND



REVISION RECORD

Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	12/06/2013	Draft	Matt Redgrove Environmental Consultant	James Sanders Senior Environmental Consultant	
2	25/07/2013	Draft	James Sanders Senior Environmental Consultant	Rachel Naylor Principal Environmental Consultant	
3	26/08/2013	Draft	James Sanders Senior Environmental Consultant	Rachel Naylor Principal Environmental Consultant	Mark Elton Technical Director
4	11/10/13	Final	James Sanders Senior Environmental Consultant	Rachel Naylor Principal Environmental Consultant	Mark Elton Technical Director
5	05/12/13	Final	James Sanders Senior Environmental Consultant	Rachel Naylor Principal Environmental Consultant	Mark Elton Technical Director
6	17/01/2014	Final	James Sanders Senior Environmental Consultant	Rachel Naylor Principal Environmental Consultant	Mark Elton Technical Director

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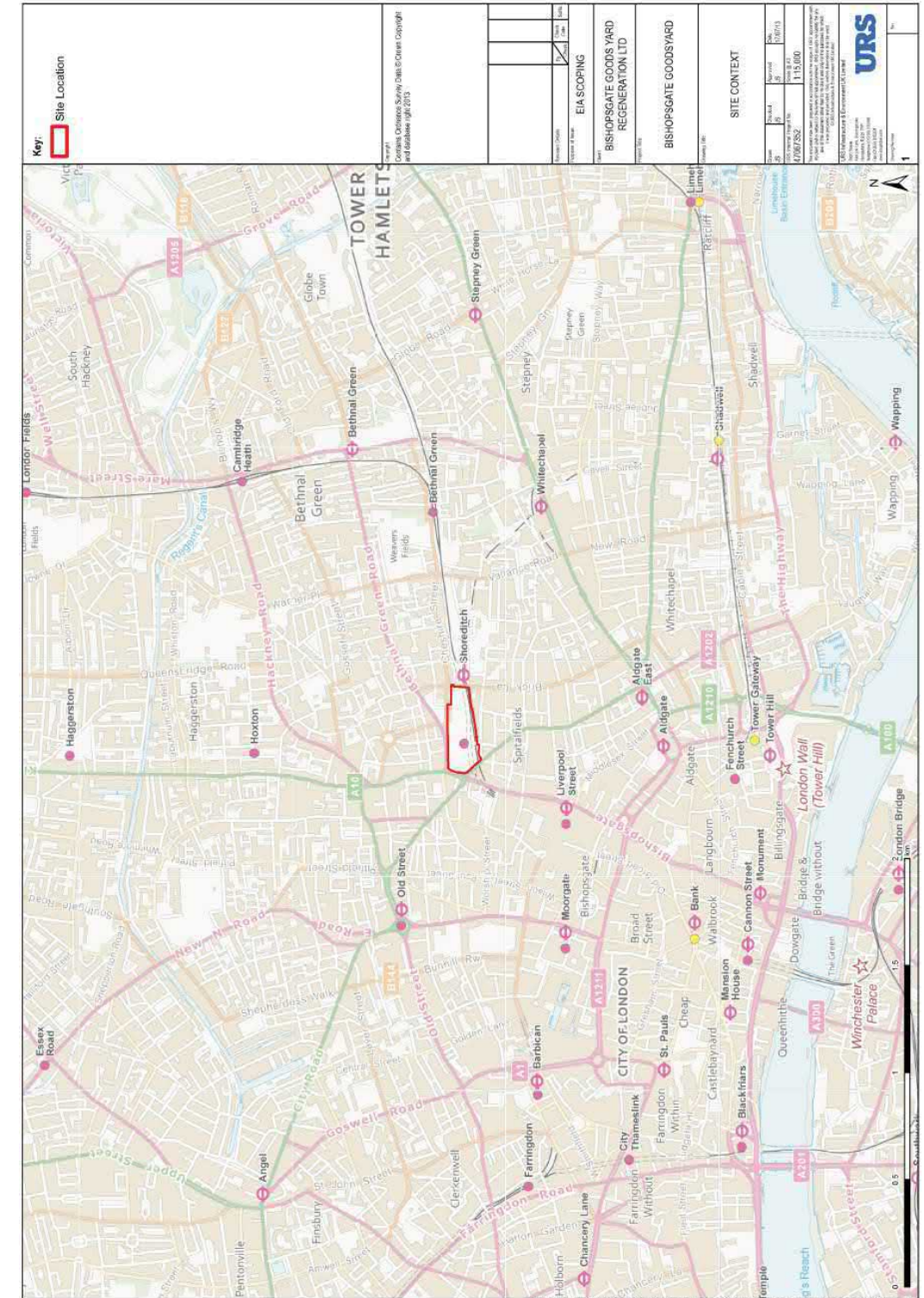
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1 INTRODUCTION

1.1 Site Location and Context

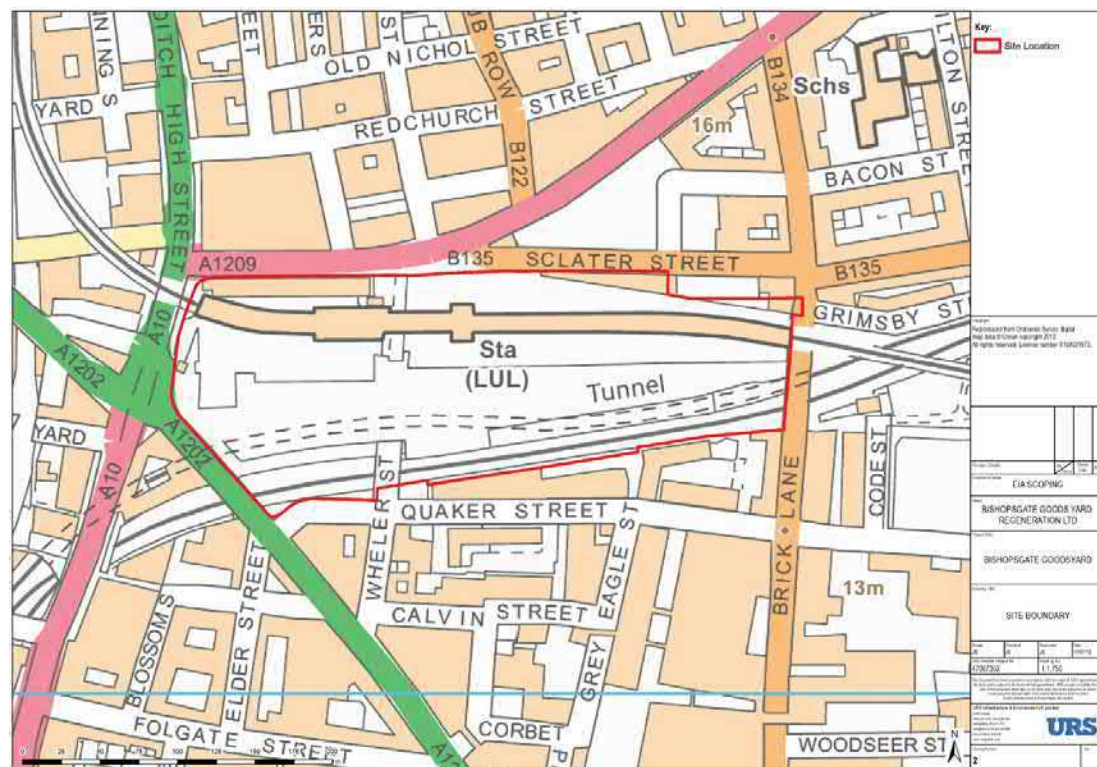
- 1.1.1 Bishopsgate Goods Yard Regeneration Ltd (hereafter referred to as the 'Applicant') is seeking to obtain part outline and part detailed (full) planning permission (forming a 'hybrid' planning application) for the redevelopment of land which is partly located in the London Borough of Tower Hamlets (LBTH) and partly located in the London Borough of Hackney (LBH) (hereafter referred to as the 'site').
- 1.1.2 The site is approximately 4.7 hectares (ha) in size and is bounded by Bethnal Green Road to the north, Brick Lane to the east, a rail line (serving Liverpool Street Station) to the south and Shoreditch High Street to the west. Braithwaite Street runs through the site connecting Bethnal Green Road to Commercial Street. The site location and surrounding context is shown in Figure 1 overleaf. Figure 2 overleaf presents an approximate planning application red line boundary.
- 1.1.3 The site has been derelict since a fire on the site in the 1960s and demolition of the majority of the buildings in 2004. Since 2004 the new Shoreditch High Street Rail Station on the East London Line has opened up in the centre of the site in April 2010, with the 'boxed' East London rail line in the centre of the site providing services to the south east, north London and Canary Wharf. In the north of the site, adjacent to Bethnal Green Road, are number of Power League temporary football pitches and the temporary Box Park Shopping Mall, comprising of shops and cafes, in refurbished shipping containers.
- 1.1.4 The site is surrounded by 4 conservation areas: South Shoreditch, Fourier Street, Redchurch Street and Elder Street.
- 1.1.5 Part of the site is situated in the London View Management Framework Supplementary Planning Guidance (March 2012) which includes two protected vistas to St Pauls Cathedral (Protected Vistas 8A.1 and 9A.1) which impacts the site and the wider City Fringe Area.
- 1.1.6 There are two Grade II listed structures on site: Braithwaite Viaduct, the Forecourt Wall and Gates to Goods Station. There are also 272 listed buildings in the vicinity of the site comprising of Grade I, Grade II and Grade II*.
- 1.1.7 There are numerous transport links in the vicinity of the site, including: Shoreditch High Street Overground; Hoxton, Moorgate and Whitechapel Overground; Hoxton, Moorgate and Bethnal Green Rail Station; and Old Street, Aldgate East, Whitechapel and Bethnal Green London Underground Stations.
- 1.1.8 Numerous buses routes run alongside, or close to the site, including the 135, 35 and 47 services.
- 1.1.9 There are several schools in the vicinity of the site, including (but not limited to): Green Valley School, William Davis Primary School and St Anne's Catholic School.
- 1.1.10 There are several community services in the area, including GP surgeries, Police Stations, Fire Stations and Community centres.
- 1.1.11 The site does not lie in a Groundwater Source Protection Zone (SPZ) or any flood risk area.
- 1.1.12 The LBTH is entirely an Air Quality Management Area (AQMA) for NO₂ and Particulate Matter (PM₁₀), while LBH is entirely an AQMA for NO₂ only.
- 1.1.13 Given the likely scale of redevelopment, the location of the site and the potential for significant environmental effects, the Applicant recognises that the development will constitute 'EIA development' under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. Hence an Environmental Impact Assessment (EIA) is required and an Environmental Statement (ES) will be prepared and submitted in support of the hybrid planning application.

Figure 1: Site Location and Surrounding Context



URS Infrastructure & Environment Limited (URS) has been commissioned to undertake the EIA on behalf of the Applicant in line with the 2011 EIA Regulations and other relevant EIA guidance including LBTH Scoping Guidance (2012).

Figure 2: Approximate Planning Application Redline Boundary



1.2 The Purpose of Scoping in the EIA Process

1.2.1 EIA Scoping forms one of the first stages of the EIA process. It refers to the activity of identifying the environmental ‘topics’ that should be considered within the EIA. In addition, EIA Scoping allows for the early identification of the receptors that may be affected or impacted by a new development. Through consideration of environmental ‘topics’ and potential receptors (both existing and introduced as a result of a new development), EIA Scoping initiates the process of defining the potential for significant impacts, which in turn results in the identification of the issues to be addressed in the EIA.

1.2.2 Regulation 13 of the 2011 EIA Regulations allows for an Applicant to ask the Local Planning Authority, in this case the LBTH and LBH (who in turn seek the opinion of other relevant Statutory Consultees), to state in writing their opinion as to the scope of the EIA. This report constitutes a request for a Scoping Opinion under Regulation 13 of the 2011 EIA Regulations.

1.3 Structure of the Scoping Report

1.3.1 The remainder of the Scoping Report presents the following:

- An overview of the Proposed ‘Bishopsgate Goods Yard’ Development;
- An overview of the potential environmental sensitivities and sensitive receptors;
- A preliminary list of EIA consultees;
- Key legislative and planning policy documents;
- The environmental ‘topics’ to be addressed within the EIA;

- The approach to assessment of impacts considered less significant;
- The proposed structure of the ES; and
- Summary and conclusions to the EIA Scoping Report.

2 OVERVIEW OF THE PROPOSED DEVELOPMENT

2.1.1 It is proposed to submit a hybrid application with ‘detailed’ and ‘outline’ elements, being the same application submitted to both Boroughs, which will encompass the following:

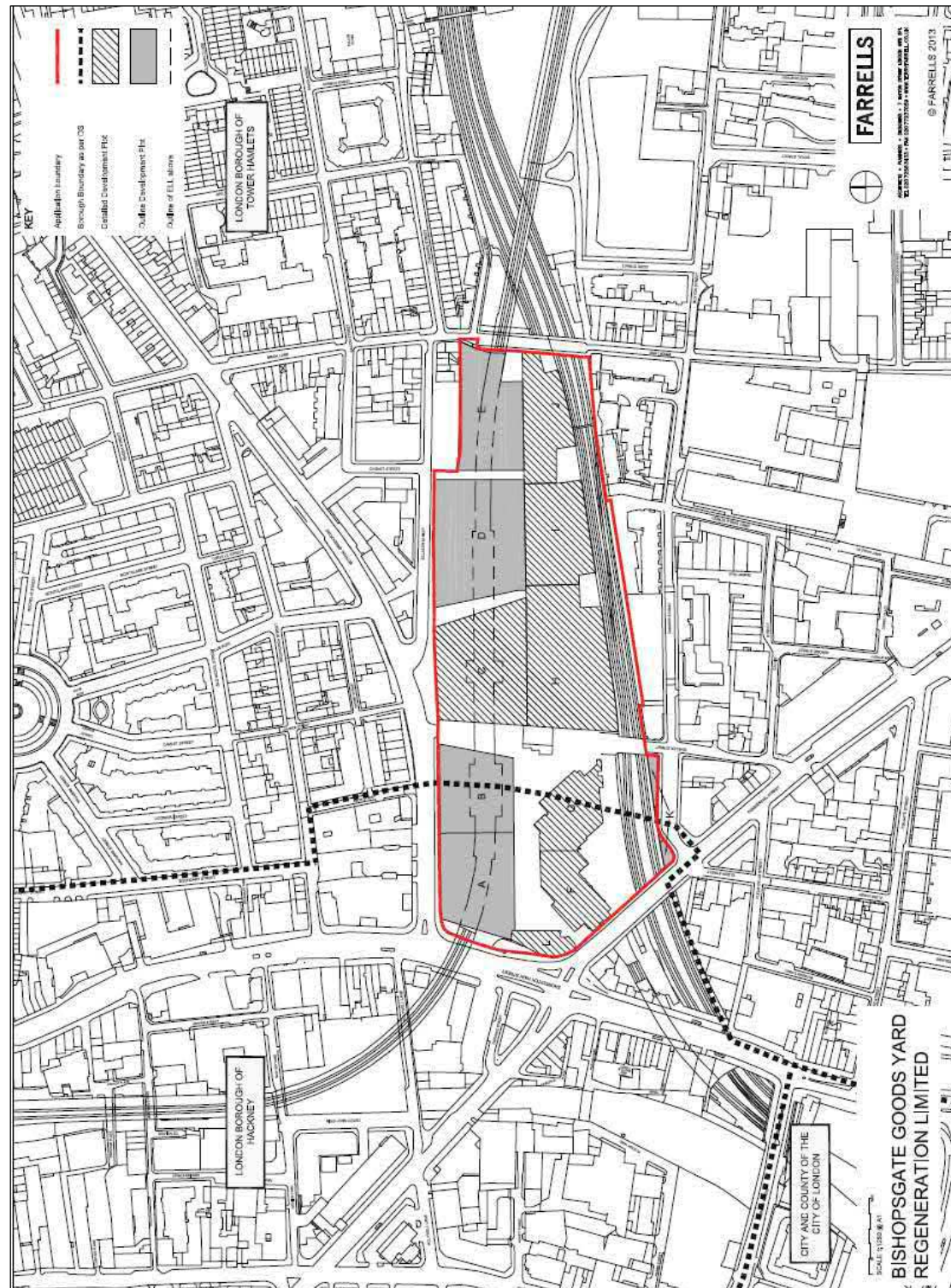
- A planning application covering the entirety of the site seeking part outline and part detailed (full) planning permission. This will provide the context for bringing forward the parameter based outline elements by way of subsequent reserved matters applications.
- The detailed elements of the application will be submitted for development plots referred to as Plots C, F, G and H, I, J at ground level (as discussed below).
- An accompanying application for listed building consent will also need to be submitted for the proposed works to and re-use of the listed arches (predominantly Plot H and L) and other listed structures within the site.

2.1.2 The proposed quantum of development has been established by the Interim Planning Guidance (IPG) adopted for the site informed by on-site constraints and visual / heritage consideration as well as other environmental factors. This provides for the following draft mix of uses/floor space:

- Provision of up to 180,000 m² Gross External Area (GEA) comprising of 6 residential buildings (equating to up to 1420 units).
- An office complex providing up to 60,000 m² (GEA);
- Retail provision throughout the scheme of up to 20,000 m² (GEA); and
- Substantial public realm, including a new raised park.

2.1.3 It is proposed to divide the site into 12 plots (named A – L) which is indicatively represented in Figure 3. Plots A-E to extend west to east along Bethnal Green Road and Sclater Street. Plots F-J to extend west to east from Commercial Street along Quaker Street and adjacent to the rail cutting. Plot K and L encompass the listed arches at the entrance to the site and the small development plot to the south of the train line respectively.

Figure 3: Proposed Development Plots



Bishopsgate Goods Yard EIA Scoping Report

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- 2.1.4 These will be delivered in four main phases, over a period of approximately 12 years expected between 2015 and 2027. It is anticipated that the detailed elements of the scheme will come forward initially followed by the outline elements subject to the reserve matters applications.
- 2.1.5 The detailed design process is still in the development stage; however initial proposals for plots A-L are outlined below:

Detailed Development Plots

- 2.1.6 **Plot C** is located to the immediate east of Shoreditch Station, will contain a podium building, spanning over the East London Line station box, with two towers above. The western tower will be 34 storeys whilst the eastern tower will be 30 storeys high. The buildings will consist of retail element, residential lobby and servicing facilities at ground level. The podium will mainly contain communal amenity space and residential accommodation whilst the towers will contain residential accommodation.
- 2.1.7 **Plots F&G** are to contain two residential towers that are linked at the base by a 2 storey podium that will contain retail, residential lobby, communal amenity space, and residential servicing facilities. Building F will be 46 storeys and Building G will be 42 storeys in height. The majority of the both towers will be residential accommodation.
- 2.1.8 **Plot H, I & J** at ground level will contain the listed arches which will be retained and integrated into development to provide retail space and create public realm (maximum of 8,000m² GIA).

Outline Development Plots

- 2.1.9 **Plots A & B** are to accommodate an office building spanning over the East London Line, including Shoreditch Overground station. A retail offering is proposed at ground and first floor level. It is expected that the buildings will contain circa 13 storeys of office accommodation above the retail accommodation.
- 2.1.10 **Plot D** is located adjacent to Plot C, this will provide in excess of 20 storeys of residential accommodation with a retail element at ground level.
- 2.1.11 **Plot E** is located to the east of Plot D, the building here will be in excess of 12 residential storeys and as with plots A, B, C & D it is to be built over the East London Line.
- 2.1.12 **Plots H, I, & J** above ground level will contain the high park which is to be located above the retained arches. The high park will link into plots C, D & E.
- 2.1.13 **Plot K** is located on far southwest corner of the site beyond the Suburban Line. This plot will be between 1 and 2 storeys in height.
- 2.1.14 **Plot L** comprises of the listed 'the Forecourt Wall and Gates to Goods Station' located on the far western boundary, adjacent to Shoreditch High Street in the location of the proposed entrance to the site. This plot will be between 1-2 storeys in height and contain a retail unit.
- 2.1.15 Scale parameters of development will be provided for the outline elements of the scheme stating the upper and lower limits for height, width and length of each building within the site boundary, and the associated floorspace (GIA) of the proposed uses.

3 POTENTIAL ENVIRONMENTAL SENSITIVITIES/SENSITIVE RECEPTORS

3.1.1 When undertaking an EIA it is important to understand which receptors will be considered as part of the assessment. The following potential sensitive receptors to the Proposed Development have been identified:

- Important short, medium and long-term views from nearby conservation areas of Fournier Street, Redchurch Street and Elder Street in LBTH and South Shoreditch Conservation area in LBH, and further afield from The Tower of London World Heritage Site (1500 metres directly south of the site) and St Paul’s Cathedral.
- Listed buildings on site (including Forecourt Wall and Gates to Old Bishopsgate Goods Station and Braithwaite Viaduct, which are both Grade II listed) as well as numerous other listed buildings in the vicinity of the site (see Figures 4 & 6);
- Surrounding arterial road network including the A10 Shoreditch High Street, A1202 Commercial Street and A1209 Bethnal Green Road;
- Local Schools, including St Mattias C of E Primary School, St Anne’s Catholic Primary School, Virginia Primary School, Christ Church C of E School;
- Surrounding residential properties along Bethnal Green Road, Sclater Street, Shoreditch High Street, Quaker Street and Brick Lane and the wider area;
- On site receptors including residential and recreational users of the open space and commercial outlets;
- Local businesses along Bethnal Green Road, Sclater Street, Shoreditch High Street, Quaker Street and Brick Lane and in the surrounding area;
- Other identified local services, including for example doctors surgeries, dentist surgeries, libraries, child care facilities, citizen advice bureaux, local amenities/shops and convenience stores;
- Pedestrians, cyclists, the business community and tourists;
- Subsurface utilities and services; and
- The surrounding below and above ground constraints such as the BT Tunnel, rail infrastructure including the East London Line, Central Line the Main Line and Suburban Line.

Figure 4: Local Sensitivities and Constraints

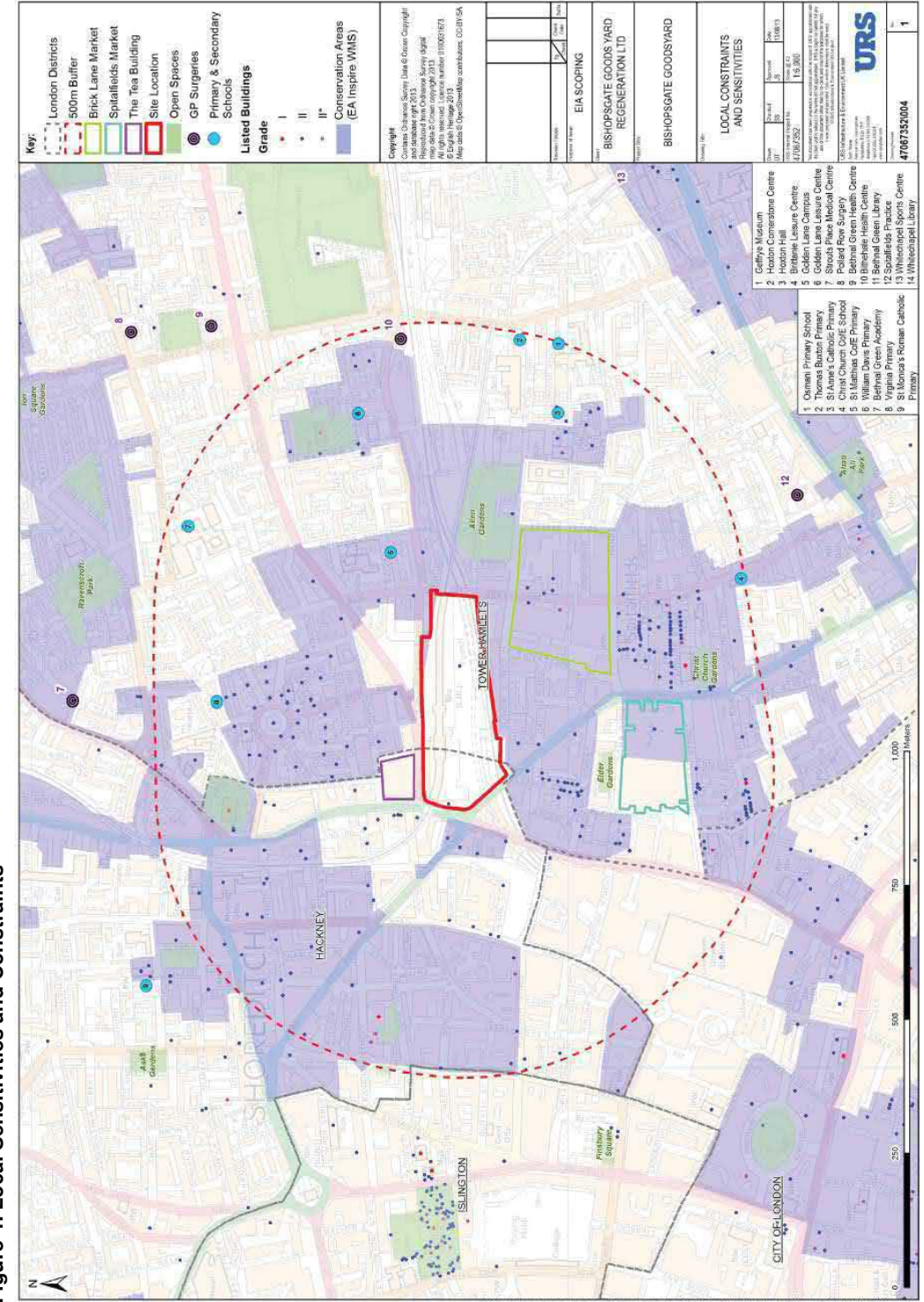
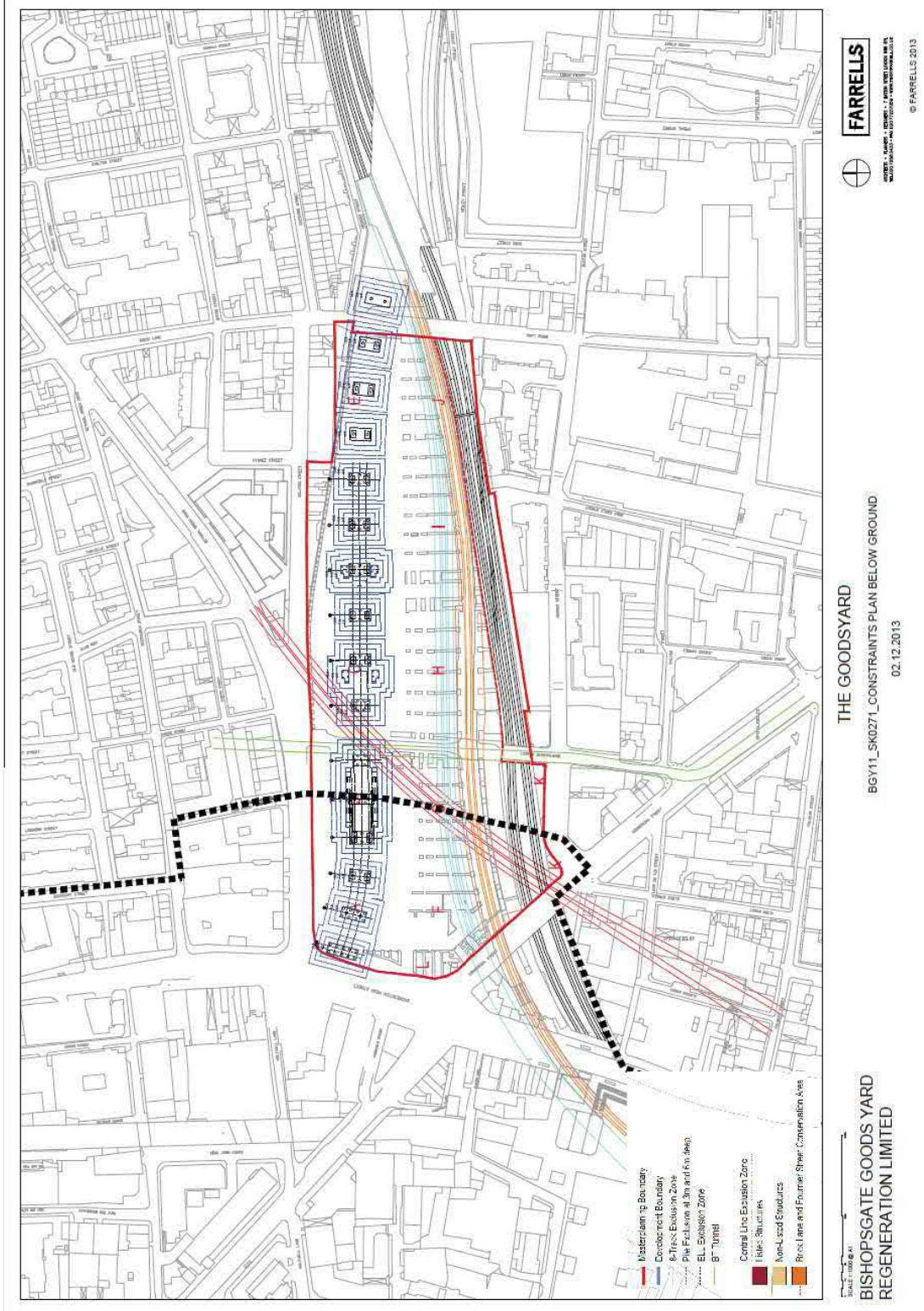
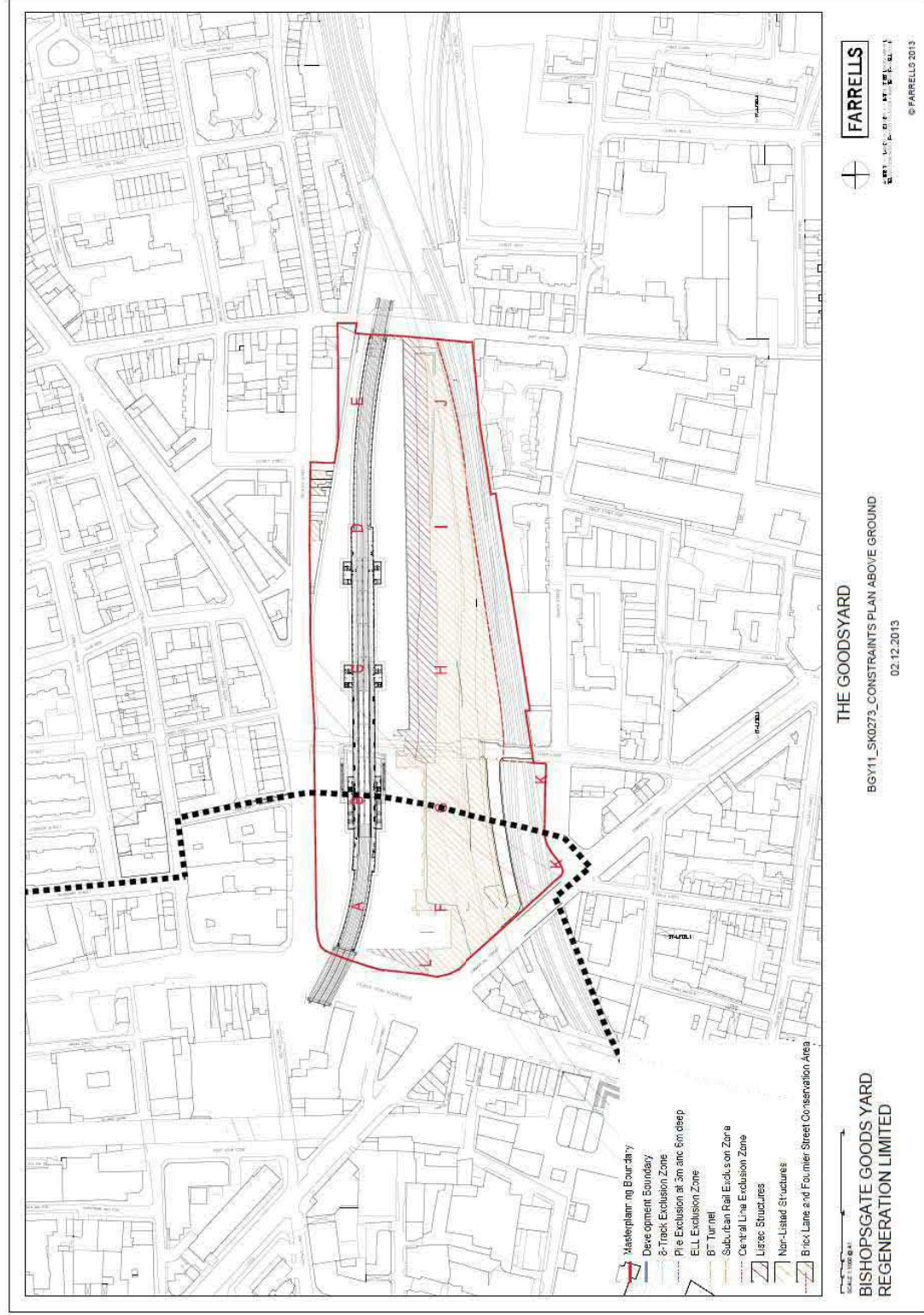


Figure 5: Below Ground Constraints



Bishopsgate Goods Yard EIA Scoping Report

Figure 6: Above Ground Constraints



Bishopsgate Goods Yard EIA Scoping Report

4 EIA CONSULTATION

- 4.1.1 The process of consultation is important to the development of a comprehensive and balanced ES. Views of the interested parties serve to help focus the environmental studies and to identify specific issues that require investigation. Consultation is an on-going process as part of design development.
- 4.1.2 A number of key stakeholders and organisations have already been consulted through the pre-application process, as follows:
- LBTH and LBH Officers;
 - Greater London Authority (GLA);
 - English Heritage (EH);
 - Transport for London (TfL); and
 - Network Rail.
- 4.1.3 In addition, a number of bodies will be consulted through the EIA and design process. These include, but are not limited to:
- Thames Water;
 - Telecommunication providers (BT);
 - The Environment Agency (EA);
 - English Heritage (EH); and
 - Natural England (NE).
- 4.1.4 Consultation is an ongoing process and will be fed back into the design of the Proposed Development.

5 KEY LEGISLATIVE AND PLANNING POLICY DOCUMENTS

5.1 EIA Statutory Requirements & Guidance

- 5.1.1 The ES will be prepared in accordance with legislative requirements and current guidance for EIA, covered by 'statutory requirements'. In particular, the ES will be prepared with due consideration to:
- Town and Country Planning (Environmental Impact Assessment) Regulations 2011;
 - Department of Environment, Transport and the Regions (DETR) Circular 02/99 Environmental Impact Assessment;
 - Department for Communities and Local Government (DCLG), June 2006 – Amended Circular on Environmental Impact Assessment, A Consultation Paper June 2006;
 - Preparation of Environmental Statements for Planning Projects that require Environmental Assessment: Good Practice Guide, Department of the Environment (DoE) 1995;
 - Institute of Environmental Management and Assessment (IEMA) Guidelines for Environmental Impact Assessment, 2004; and
 - Office of the Deputy Prime Minister (ODPM) Environmental Impact Assessment – A Guide to Procedures, 2000.

5.2 Planning Policy Context

- 5.2.1 Each of the technical chapters contained within the ES will include reference to relevant national, regional and local planning policy, a summary of which is given below.

National Planning Policy

- 5.2.2 The ES will have regard to the National Planning Policy Framework (NPPF) (2012), which replaces the previous suite of national Planning Policy Statements and Planning Policy Guidance documents. The policies contained within the NPPF articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.

Regional Planning Policy

- The London Plan: Spatial Development Strategy for Greater London (July 2011);
- London View Management Framework SPG (March 2012);
- Sustainable Design and Construction SPG (May 2006);
- Land for Transport Function SPG (March 2007);
- Accessible London: Achieving an Inclusive Environment (April 2004); and
- Regional Flood Risk Appraisal for the London Plan (October 2009).

Local Planning Policy

- Bishopsgate Goods Yard, Interim Planning Guidance, (January 2010);
- LBTH, Core strategy, (September 2010);
- LBTH, Managing Development Document (MDD), (April 2013);
- LBTH, Affordable Housing Supplementary Planning Document (AHSPD), (April 2013);
- LBTH, Planning Obligations SPD (2012);
- LBH Saved and Retained UDP Policies (2010);
- LBH Core Strategy (November 2010);
- LBH Development Management Local Plan (2013); and
- LBH SPGs, Supplementary Planning Documents (SPDs) & Other Documents, where relevant:
 - SPG1 - New Residential Development (adopted February 1998);
 - SPG11 - Access for People with Disabilities (adopted February 1988);
 - SPD - Planning Contributions (adopted November 2006);
 - SPD - Affordable Housing (adopted July 2005); and
 - SPD - Public Realm Strategy (adopted February 2012).

6 ENVIRONMENTAL ‘TOPICS’ TO BE ADDRESSED WITHIN THE EIA

6.1 Introduction

6.1.1 The EIA and associated technical studies will reflect current guidelines and relevant legislation and will be carried out in accordance with statutory guidance, including the requirements for the contents of an ES. For the EIA to be an effective decision-making tool, the ES needs to focus on the main or likely significant environmental effects, within a range of topics. These topics have been identified through a review of existing information, baseline studies and preliminary review of the emerging Proposed Development.

6.1.2 The EIA will consider the impacts associated with the following environmental ‘topics’:

- Demolition and Construction (including Demolition and Construction Waste);
- Waste and Recycling;
- Socio-Economics;
- Ground Conditions;
- Traffic and Transport;
- Wind Microclimate;
- Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution;
- Air Quality;
- Noise and Vibration;
- Water Resources, Drainage and Flood Risk;
- Archaeology;
- Built Heritage;
- Ecology;
- TV and Radio (Electronic) Interference; and
- Townscape, Conservation and Visual.

6.1.3 Each of the technical assessment chapters will assess the impacts of the ‘outline’ and ‘detailed’ elements of the scheme.

6.1.4 The following sections of this EIA Scoping Report provide the detail on each of the above environmental ‘topics’, specifically, the proposed scope of each technical assessment and the assessment methodology.

6.1.5 In addition to the above, the following Chapters will be provided as part of the ES:

- Introduction;
- EIA Methodology (see below for further details);
- Alternatives & Design Evolution (including the ‘Do Nothing Scenario’, ‘Alternative Sites’ and ‘Alternatives Designs’);
- Description of the Development;
- Impact interactions and Cumulative Impact Assessment (see below for further details);

- Residual Impact Assessment and Conclusions;
- Limited Development Scenario (TBC) (as described in section 6.7); and
- Glossary & Abbreviations.

6.1.6 The ES will make reference to and, where appropriate, provide as a technical appendix to the ES, other relevant planning application documents. In summary, the ES will comprise ES Volume I (main chapters), ES Volume II (Townscape, Conservation and Visual Impact Assessment), ES Volume III (technical appendices) and a Non-Technical Summary (NTS).

6.2 EIA Methodology

6.2.1 The EIA will address the direct impacts of the Proposed Development on the environment in addition to the indirect, cumulative, short, medium and long term, permanent, temporary, beneficial and adverse impacts arising from the Proposed Development. The main mitigation measures envisaged in order to avoid, reduce or remedy significant adverse impacts will be described, and enhancement measures will be considered where appropriate.

6.2.2 Each technical chapter of the ES will define the baseline against which the environmental impacts of the Proposed Development will be assessed. The baseline conditions will be taken as the current (2014) conditions on site.

6.2.3 Following on from the definition of the baseline conditions, the impact of the Proposed Development will be assessed during the demolition and construction phase and on completion and occupation of the Proposed Development. Due to the length of the construction phase (approximately 12 years) on site residential receptors will be considered where appropriate.

6.2.4 For the outline elements of the scheme parameters will be used and reasonable worst case scenarios based on professional judgement will be considered for each of the technical assessments.

6.2.5 The potential impacts of the Proposed Development will be assessed in each of the technical chapters and appropriate mitigation measures recommended. An assessment will then be made after the application of the recommended mitigation measures to determine the residual effects.

6.2.6 The residual effects of Moderate / Major significance are considered to be the “likely significant effects” of the Proposed Development.

6.2.7 An assessment will then be made of the final residual effects.

6.2.8 Impact interactions and cumulative impacts will then be assessed (see below for further details).

6.2.9 In summary, each technical chapter of the ES will:

- Define baseline conditions (the existing site);
- Assess the potential and residual impacts of the Proposed Development; and
- Assess the impacts of the Proposed Development in addition to a number of other schemes considered as having the potential to give rise to cumulative impacts.

6.3 Methodology for Parameter Based Assessment

- 6.3.1 The following methodology applies to the outline elements of the Proposed Development. In relation to the detailed parts, a fixed / detailed massing and amount of development will be assessed by the EIA.
- 6.3.2 In relation to the outline elements of the Proposed Development, sufficient information in relation to the outline parameters will be provided as part of the planning application to allow for a robust assessment of the likely environmental and socio-economic effects of the outline parts of the Proposed Development whilst building in flexibility into the design to allow for detailed designs to come forward as part of the reserved matters applications.
- 6.3.3 The outline parts of the Proposed Development will be defined in a series of Parameter Plans, which will be accompanied by a framework of Design Guidelines and a Design Code.

6.4 Scale and Layout Parameters

- 6.4.1 It is anticipated that the provision of information on the scale and layout of the outline parts of the Proposed Development will be presented as scale and layout parameters.
- 6.4.2 A 3-dimensional envelope which represents the upper limit (maximum extent) of the outline development will be assumed for the purposes of the EIA [in most cases] (as identified above, a separate defined fixed building envelope will be proposed for the detailed elements of the scheme). The maximum building envelope assessed would comprise all of the proposed buildings at their maximum vertical and horizontal extent. The maximum permissible development (in terms of “massing”) will potentially lead to, for example, increased view obstruction, increased wind speeds, greater overshadowing or daylight/sunlight reductions and a reduced amount of available open space between the buildings and will generate the likely worst-case environmental and socio-economic effects of the outline parts of the Proposed Development. This will be reviewed by each of the technical specialist who will use their professional judgement to determine a reasonable worst case scenario if different. [In cases where the minimum development envelope will give rise to the “worst case scenario” that will instead be assessed.]
- 6.4.3 On the basis that there is not significant variation between the maximum building envelope and a minimum building envelope, it is not the intention to provide full details on the likely effects of both the maximum and minimum building envelopes. However, as there may be cases where it is of assistance to the Council to have an understanding of the range of likely significant effects, these details will be provided where this is considered appropriate based on professional judgement.

6.5 Amount of Development and Uses Proposed

- 6.5.1 The application will include details associated with the amount of development and the uses proposed. The amount of development stated will comprise an upper and lower limit. The technical aspects of the EIA that will apply the maximum amount of development (i.e. the proposed floor areas) and development uses for the purposes of the assessment of impacts are as follows:
- Socio-Economics, specifically in relation to retail provision, employment creation, population and child yield estimates and so demand for social infrastructure (e.g. doctors, dentists, school places, open space etc) and additional local spending; and
 - Traffic and Transportation, specifically in relation to trip generation and model split (and so indirectly, Noise and Vibration and Air Quality in relation to the assessment of road traffic noise and air quality effects).
- 6.5.2 The EIA will quantitatively assess the maximum amount of development as this essentially generates the greatest amount of traffic or the highest new population for example. However, a qualitative review of how the likely effects may alter under the minimum amount of development will be provided in the ES (specifically in relation to employment benefits, which to generate the likely worst-case effect would be assessed under the minimum amount of employment generating floorspace).

- 6.5.3 As highlighted above, in relation to the detailed parts of the development, the fixed floorspace across the uses proposed will be assessed.

6.6 Phasing

- 6.6.1 The Proposed Development will be phased over a 12 year period and the EIA will seek to address the anticipated phasing. This will be achieved by defining a series of impact assessment ‘time slices’ which will cover demolition and construction activities and the completed operational scheme (including any intermediate stages for example where parts of the scheme are complete and occupied whilst other parts are still undergoing demolition or construction).

6.7 Limited Development Scenario

- 6.7.1 The Environmental Statement will present the assessment of ‘the Proposed Development’ which is the development sought for approval and encompasses the whole development in both boroughs. This will consist of development plots A, B, C, D, E, F, G, H, I, J, K and L. An assessment will be provided of the demolition and construction effects, the effects once the development is complete and operational and the cumulative effects of the Proposed Development with other surrounding development schemes.
- 6.7.2 The site straddles the Borough boundary of LBH and LBTH therefore identical planning applications (and associated documents) will be submitted to each of the Boroughs for decision making purposes. This could potentially give rise to a situation whereby one Borough grants permission and the other does not. In the possible event where this situation occurs it is necessary that the Environmental Statement has adequately assessed the ‘likely significant’ effects.
- 6.7.3 Therefore an additional assessment scenario will also be presented within the ES. This scenario will be the development that will occur wholly within the LBTH (hereafter referred to as the ‘Limited Development Scenario’) and will encompass the development plots (which do not straddle the boundary) that can be brought forward independently of the LBH elements of the scheme. This will include development plots C, D, E, H, I and J. An assessment will be provided of the demolition and construction effects, the effects once the Limited Development Scenario is complete and operational and the cumulative effects of the Limited Development Scenario with other surrounding development schemes. An alternative scenario considering the development plots in LBH is not being considered as these buildings straddle the boundary and therefore it would not be possible to build them independently.
- 6.7.4 The Limited Development Scenario will be presented as a stand alone chapter within the main body of the ES (ES Volume I) titled ‘Limited Development Scenario’ and will summarise the effects associated with this possible development scenario coming forward independently. The summary of effects will state where the residual effects / mitigation measures are the same or different as the residual effects reported for the main assessment of the Proposed Development, with relevant justification. This will also include a description of the demolition and construction programme relevant phases / time slices and the condensed time period of construction that would be applied to the Limited Development Scenario. This summary chapter will explicitly refer to an appended report (ES Volume III - Appendix K) which will provide the details of the assessment undertaken and the main body of the Limited Development Scenario assessment.
- 6.7.5 The baseline for the Limited Development Scenario as for the main development scenario would consist of the current (2014) conditions on site. The assessments when considering the LBH section of the site will also assume the current (2014) conditions on the site.
- 6.7.6 The appended report will only present the difference in the Limited Development Scenario assessments, the mitigation measures, the cumulative effects and the associated justification in comparison with the main assessment of the Proposed Development.

6.7.7 The associated EIA documents namely the Townscape and Visual Impact Assessment (TVIA) and the Transport Assessment (TA) will also assess the Limited Development Scenario, these assessments will also be appended to the ES in a similar format. A summary of this information will be provided within the summary chapter with further detail to be included within the appended report.

6.8 Impact interactions & Cumulative Impact Assessment

6.8.1 The EIA will identify the potential for impact interactions and cumulative impacts.

6.8.2 Impact interactions occur as interactions between impacts associated with just one project i.e. the combined effect of individual impacts arising as a result of the Proposed Development, for example impacts in relation to noise, airborne dust or traffic impacting on a single receptor.

6.8.3 Cumulative impacts occur as interactions between the impacts of a number of projects in an area which may, on an individual basis be insignificant but, together (i.e. cumulatively), have a significant effect. In this case, impacts associated with the Proposed Development and other foreseeable schemes located within a 1 kilometre (km) radius of the site.

Impact Interactions

6.8.4 A review of the residual impacts presented within the ES will be undertaken, along with an exercise which tabulates the impacts against receptors in order to identify the potential for impact interactions and so combined effects. Only residual impacts classified as being of minor, moderate, major significance will be considered in relation to the potential for the combined effects of individual impacts. Residual impacts of negligible significance will be excluded from the assessment of the combined effects of individual impacts as, by virtue of their definition they are considered to be imperceptible impacts to an environmental / socio-economic resource or receptor.

6.8.5 Where there is more than one impact on a particular receptor, the potential for impact interactions will be determined. If there is the potential for impact interactions then consideration will be given as to whether there is the potential for any resultant combined effects.

Cumulative Impacts

6.8.6 The review of the combined impacts of the Proposed Development with other schemes will be presented within the ES.

6.8.7 The EIA will consider other schemes located within 1km from the site. The 1km distance has been applied to ensure all schemes with the potential to interact in a cumulative manner within the vicinity of the site are taken into account. The schemes to be considered as part of the cumulative assessment of Volume I in the ES will comprise consented schemes, those with a resolution to grant consent and schemes under construction. Schemes which have been granted permission, with an application submitted to extend the time limit for the implementation of planning permission will also be considered. After consultation with LBTH it has been agreed to also include significant schemes which have been submitted for planning. In order to be considered as being significant, the schemes identified either comprise over 50 residential units or provide over 10,000m² of floorspace.

6.8.8 Temporary onsite uses will also be considered in the cumulative assessment. The Proposed Development will be built out in a phased approach over a period of approximately 12 years, with certain development plots being built out first. It is likely that a number of temporary uses may come forward to utilise the vacant plots between construction phases. Assumptions will be made on what uses of are likely to come forward and these will be “sensitivity” tested (primarily on a qualitative basis) for their likely significant environmental effects.

6.8.9 A list of the schemes to be considered within the cumulative impact assessment is provided in Table 1 and presented on Figure 7.

Table 1: List of Cumulative Schemes

No	Address	Application Number	Description	Status
1	32-42 Bethnal Green Road, Shoreditch (LBTH)	PA/07/02193	Demolition of existing building and erection of 2 buildings ranging from 4 to 25 storeys in height to provide 3660m ² of commercial floor space within Use Classes A1, A2, A3, A4, B1, B8, D1 and/or D2 together with 360 residential units (comprising 32 studios, 135x1 bed, 116x21 bed, 65 x3 bed, 7x4 bed and 5x5 bed), car parking, bicycle parking, refuse/recycling facilities, access, amenity space and new public space.	Under Construction-near complete
2	Principal Place (LBH)	2011/0698	Full planning permission for the demolition of the rear of 233 Shoreditch High Street, perimeter walls, viaduct structure across Plough Yard and all other structures on the site and the erection of a decking structure and buildings comprising: <ul style="list-style-type: none"> Building 1: a part 10, part 16 storey building to provide 76,465m² (GEA) of office floorspace (Use Class B1) together with 1,471m² (GEA) of retail floorspace (Use Class A1-A4) at ground floor level. Building 2: a 50-storey block comprising 243 private residential units (111x one bed, 121 x two beds and 8 x three beds) together with 242m² (GEA) of retail floor space (Use Class A1-A4) at ground floor level. Building 3: a 14-storey block providing 39 intermediate housing units (12 x one bed, 21 x two beds and 6 x three beds) and 116m² (GEA) of retail floorspace (Use Class A1-A4) at ground floor. Building 4: a 6-storey block providing 17 affordable rent units (3 x one bed, 6 x two beds, 6 x three beds and 2 x four beds). Building 5: a single storey block linked to buildings 3 and 4 comprising of 263m² (GEA) of flexible floorspace (Use Class A1-A4/D1/D2/B1). A single storey kiosk comprising 100m² (GEA) of retail floorspace (Use Class A1-A4). Together with two separately accessed basements, 51 residential parking spaces (2 blue badge) and 22 other (commercial) car parking spaces (2 blue badge), open space with hard and soft landscaping; retention and creation of new vehicular and pedestrian access, servicing areas and roof top plant and all other associated works.	Full planning permission
3	Former Nicholls and Clarke Site (LBTH)	PA/10/02764	A mixed-use development comprising: buildings between 4 and 8 storeys in height of 48.40m AOD (plus plant) to incorporate approximately 14,000m ² of new B1 accommodation; approximately 4050m ² of B1 accommodation in restored and converted buildings, approximately 2000 m ² of A1 Retail and A3 Restaurant Uses; approximately 800m ² of A4 Public House use; together with the re-creation of the historic public space known as Blossom Place, with adjoining amenity space, and improvements to the public realm along Shoreditch High Street including provision of access to Blossom Place, highway works to consolidate existing vehicle lay-bys on Shoreditch High Street and Blossom Street and provision of managed off-street servicing and parking facilities.	Full planning permission
4	Land at Fakuiddin Street and Pedley Street (LBTH)	PA/12/02228	Redevelopment of site (including land at Fakuiddin Street) to provide a 63(100% affordable housing) units within three blocks measuring between two and seven storeys including associated shared and private amenity space, landscaping, disabled parking, cycle parking, child play area and community centre (273 m ²).	Full planning permission
5	86 Brick Lane, E1 6RL (LBTH)	PA/13/00494	Demolition of existing building and erection of a part 4 and part 5-storey (plus lower ground floor) building to provide a hotel (5,077 m ²) and a ground floor level unit (24 m ²) for use as A1 (Shops), A2 (Financial & professional services): application to vary planning permission PA/11/031435	(Current) Planning Application
6	87 – 95 Curtain Road, EC2A 3BS (LBH)	2008/0511	Demolition of 91-95 Curtain Road and demolition of fourth storey of 87-89 Curtain Road, erection of three storey extension to 87-89 and new 7 storey building at 91-95, to provide 529 m ² A1 (retail) at ground floor and basement, 1830 m ² B1 (offices) at basement level	Under construction

No	Address	Application Number	Description	Status
7	10 – 50 Willow Street, EC2A 4BH (LBH)	2010/1067	Demolition of existing building and erection of a new part-three, part-five and part six storey building (plus basement) for use as a 195-bedroom hotel (use class C1), including bar, restaurant and business centre.	Opening in 2013
8	The Stage Shoreditch (LBH)	2012/3871	The demolition of buildings and structures, the excavation, preservation, and exhibition of the remains of the Curtain Theatre (D1 Use). The excavation of a basement structure containing A1-A4/B1/C3 uses. The provision of four buildings comprising a 40-storey residential tower with shared A1-A4/B1/C3 back of house uses and retail in A1-A4 use at ground floor; a 9-storey B1 office building with shared A1-A4/B1 back of house** uses and flexible A1-A4/B1 uses at ground floor and first floors, and retail in A1-A4 use at ground floor, and associated servicing facilities; a 13-storey B1 office building with shared A1-A4/B1 back of house** uses and retail in A1-A4 uses at ground floor, and flexible A1-A4/B1 uses at ground floor; a 2-storey pavilion containing D1/D2 uses. Works of demolition, alteration, extension and change of use to the railway viaduct to create a range of A1-A4 retail uses at ground and railway bed level along with the laying out of an open space. The laying out of an open space on land currently occupied by a service yard and shed adjacent to the railway viaduct that will connect Great Eastern Street and Hewett Street to Plough Yard. The temporary removal and reinstatement of three grade II listed bollards on Curtain Road.	Resolution to Grant
9	187 - 193 Shoreditch High Street and land bounded by Shoreditch High Street; Holywell Lane and King John Court London E1 6HU (LBH)	2012/3792	Redevelopment comprising: demolition of 186 Shoreditch High Street; refurbishment of 187 Shoreditch High Street (including demolition of rear additions and erection of a 4 storey rear extension); and erection of 5 new buildings around an area of landscaped open space (to be used for market activities including 10 x kiosks plus table top markets) with associated provision for outdoor terraces, refuse provision, landscaping, roof plant and cycle parking. The new buildings include: a part 3 part 5 storey plus basement and mezzanine building; a 4 storey building; a single storey building of double storey height for potential mezzanine; a part 4 part 9 storey plus basement building; and a 2 storey plus basement building. The redevelopment comprises approximately 5909 m ² (GEA) of Class B1/A1/A3 (office / retail / cafe / restaurant) accommodation; 5907 m ² (GEA) of Class C1 (185 room hotel); 8 x residential (Class C3) units (4 x 2 bed and 4 x 3bed).	(Current) Planning Application
10	Site At Huntingdon Industrial Estate, Whitby Street, London, E2 (LBTH)	PA/13/01638	Demolition and redevelopment to provide a mixed use development comprising two basement floors and between 2 - 14 storeys. The proposal provides 78 residential units (Use Class C3), 456 m ² Class A1, 359 m ² Class A1/B1/D2 and 1,131 m ² A1/A3/A4/D2 at basement.	(To come forward in 2014)
11	SILWEX HOUSE, Quaker Street, London (LBTH)	PA/07/02310	Construction of a two storey roof extension in connection with a change of use from workshop/warehouse (Class B8) to apartment hotel accommodation (Class C1) with ancillary commercial floor space (661 m ²), service areas as well as provision of basement pa	Permitted
12	Land within former Truman's Brewery Site, on corner of Spital Street and Buxton Street. (LBTH)	PA/12/00090	Demolition of the existing store building, substation, workshops and boundary wall to Buxton Street and Spital Street up to Cooperage Building and erection of a 3 storey high data centre with basement accommodation (Use Class B8) and new substation, including provision of Use Class B1 enterprise / D1 training floor space, provision of rooftop satellite dishes, roof mounted mechanical plant, security fencing, cycle parking and provision of car parking spaces and associated works.	Permitted October 2012
13	London Fruit & Wool Exchange, Brushfield St, 99-101 Commercial Street, 54 Brushfield St & Whites Row Car Park, London (LBTH)	PA/11/02220	Demolition of White's Row Multi-Storey Car Park, 99-101 Commercial Street (The Bank), 54 Brushfield Street (The Gun Public House), and partial demolition of the London Fruit and Wool Exchange behind the retained Brushfield Street Façade and the erection of a 6 storey building with a basement, as offices and retail accommodation, with landscaping and associated works, together with a new pavilion building for retail accommodation".	Permitted March 2013

No	Address	Application Number	Description	Status
14	Site At 3-11 Goulston Street And 4-6 And 16-22 Middlesex Street, London (LBTH)	PA/12/02045	Demolition of the existing buildings and erection of a nine storey building to provide a 395 room hotel (Use Class C1), together with the creation of a new pedestrian route and other works incidental to the development.	Permitted subject to s106 April 2013
15	River Plate House 7 - 11 Finsbury Circus (north), London EC2M 7EA (COL)	12/00812/CAC 12/00811/FUL MAJ	Demolition of the existing building with partial retention of the facade to South Place in connection with construction of a 9 storey development. Redevelopment of the site behind partially retained facade to South Place and erection of a new 9 storey office building (ground floor plus 8 storeys) (Class B1(a)) with alternative use of part ground and part lower ground for either retail (Class A1/A2/A3/A4) or Class D2 (gymnasium) or Class B1(a) (offices), roof top and basement M & E plant, together with servicing facilities, one disabled car parking space and cycle parking and other associated ancillary works. (Total floorspace: 23,928 m ²).	Permitted May 2013
16	15 - 25 New North Road, Hackney, London N1 6JB (LBH)	2012/1517	Outline application for demolition of vacant telecommunications switch centre and ancillary office; AND erection of a part-four to part-six storey building comprising 56 residential units, 985 m ² flexible commercial (Classes A1, A2, A3, B1 and/or D1) floor space, 4 disabled parking spaces, 84 cycle spaces and access (with approval sought for Access, Layout and Scale); AND erection of a five storey building facing New North Road comprising 5 (4 x two bed and 1 x one bed) residential units (with no matters reserved).	Permitted subject to s106 July 2012
17	1-13 Long Street Hackney LONDON E2 8HJ (LBH)	2012/2013	Erection of a new part 4, part 5, part 8-storey building to provide for 237 rooms of student accommodation and associated communal areas; erection of a new 10-storey building and two-storey extensions to the existing buildings at 1-3 Long Street and 5-9 Long Street to create 6-storey buildings along with associated refurbishment works to provide for 73 residential units (40 x 1-bed, 23 x 2-bed, 8 x 3-bed & 2 x 4-bed); conversion of ground floor of 5-9 Long Street to provide for 816 m ² (GEA) of Class B1 use floorspace; construction of a landscaped podium above car parking area at ground floor level (40 car spaces); the provision of 255 cycle spaces and access and landscape works in association with Conservation Area Consent Ref: 2012/2014 for the demolition of 11-13 Long Street and associated structures.	Permitted subject to s106 January 2013
18	49-51 Paul Street, London EC2A 4NG (LBH)	2012/0816	Erection of a part five to part eight storey building to provide Class C1 Use (hotel) together with associated facilities.	Permitted subject to s106 August 2012
19	115 Curtain Road Hackney London EC2A 3BS (LBH)	2012/0789	Erection of six storey building to accommodate office floorspace (B1 Use Class) at basement, ground and part first floor levels and six residential units at first to fifth floor levels together with formation of roof terraces and balconies.	Permitted December 2012
20	ELECTRICITY SUB STATION Hearn Street Hackney EC2A 3LS (LBH)	2012/3873	Demolition of the sub-station and the construction of a 13-storey B1 office building with shared back of house uses and flexible retail/restaurant/bar use at ground floor to be serviced from other land in the ownership and control of the applicant, including basement and also including associated works. The appearance of the proposed building is reserved. The building provides 15,313 m ² of B1 office floorspace; 614 m ² of flexible retail/restaurant/bar floorspace (A1 - A4); and 614 m ² of share back of house (sui generis).	(Current) Planning Application December 2012
21	12-20 Paul Street & 83-105 Clifton Street London EC2	2011/1922	Extension of time of planning application reference APP/U5360/A/08/2062445 for mixed use redevelopment to provide 419 student rooms, 135 m ² of flexible B1/A3 space and 5400 m ² of B1 floor space, associated parking and landscaping.	Permitted March 2012
22	5-29 Sun Street, 1-17 Crown Place 8-16 Earl Street and 54 Wilson Street	2009/2464	Demolition of existing buildings on site (excluding 5-11 Sun Street (bar rear elements) and construction within eastern part of the site of a 2 basement plus part eleven, part twelve, part seventeen, part twenty, part twenty one, part twenty four storey (105 metres AGL) office building providing 53,279 m ² of use Class B1 and 1,568m ² of	Permitted January 2012

No	Address	Application Number	Description	Status
	London EC2M 2PS		flexible retail/office (Use Class A1, A2, A3, A4 and B1) floor space, plus the refurbishment of 5- 11 Sun Street within the western part of the site and construction of ground plus three storey terrace for a 34 room hotel (2,591 m ² C1 Use Class) and 194 m ² of flexible retail (Use class A1,A2 and A3); together with the provision of vehicular access, and 220 cycle spaces off Earl Street, works of hard and soft landscaping and enabling works associated with the development. (The application is subject to the submission of an Environmental Statement in accordance with the Town and Country Planning (Environmental Impact Assessment (England and Wales) 1999 (SI 1999 No.293))	
23	145 City Road London EC1 - 37 East Road London N1 6AZ	2012/3259	Demolition of existing buildings and erection of a 39 storey residential building with retail or café / restaurant units at ground floor, a 10 storey office building with retail or café / restaurant units at ground floor and a single storey retail or café / restaurant kiosk. The development consists of a total of 302 residential units (26 x studios, 121 x 1 bed, 126 x 2 bed and 29 x 3 bed), 10625 m ² of Use Class B1 (Office) floorspace and 943 m ² of Use Class A1 (Retail) or A3 (Restaurant or Cafes) floorspace plus basement, associated landscaping, car parking (29 spaces including 4 disabled spaces), vehicular access and cycle parking (459 spaces). Application accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.	(Current) Planning Application
24	84-86 Great Eastern Street and 1-3 Rivington Street London EC2A 3JL	2009/2405	Town and Country Planning (Environmental Impact Assessment (England and Wales) 1999 (SI 1999 No.293) Environmental Statement accompanying planning application for the demolition of existing buildings on the site and construction of a part eighteen storey (Block A: ground plus seventeen floors) and part six storey (Blocks B and C: ground plus five floors) building for use as a 350 room Hotel (23,135 m ² GIA Use Class C1 including health and fitness facilities) plus retail, bar and restaurant, art gallery and art cinema (1500 m ² GIA Use Class A1/A3/A4/D1 and D2); Offices (1,085 m ² GIA Use Class B1); and roof top bar and restaurant (716 m ² GIA Use Class A3/A4); together with ancillary hard and soft landscaping, revised vehicular access/egress, 48 cycle spaces and refuse/service arrangements. (Submission of further Environmental Information to the Environmental Statement and amendments to ground level layout, and elevations to proposed buildings).	Permitted January 2011
25	Site bound by Corsham Street, Brunswick Place and Baches Street Hackney N1 6DP	2011/3007	Demolition of existing buildings and erection of part 2 to part 11 storey building to provide new education facility comprising 5,528 m ² teaching accommodation and associated facilities (D1 Class use); 541 student rooms; 376 m ² of flexible retail/restaurant use (Class A1/A3 use); together with cycle parking, refuse and recycling and external landscaping.	Permitted March 2012
26	Former Site at 58 To 64 Three Colts Lane And 191 To 205 Cambridge Heath Road, London (LBTH)	PA/11/03785	Demolition of existing buildings and erection of two high density mixed-use developments in two blocks (i.e. Block A and B) with approximately 1224 m ² of retail and employment uses at ground and mezzanine levels, and 149 residential units in upper floors	Permitted
27	Former Beagle House Now Known As Maersk House, Braham Street, London, E1	PA/13/305	Demolition of existing building (Beagle House) and construction of a 23 storey mixed-use development comprising 1,940 m ² of retail /commercial space (Class A1 - A5 use) at ground floor and 1st floor level with residential accommodation to provide 291 flats.	(Current) Planning Application
28	Aldgate Place Land Bounded By Whitechapel High Street, Leman Street, Buckle Street & Commercial Rd,	PA/13/218	Demolition of existing buildings and creation of a mixed use development, comprising three towers of 22, 25 and 26 storeys and a series of lower buildings ranging from 6 to 9 storeys. Provision of 463 private and affordable residential dwellings	(Current) Planning Application

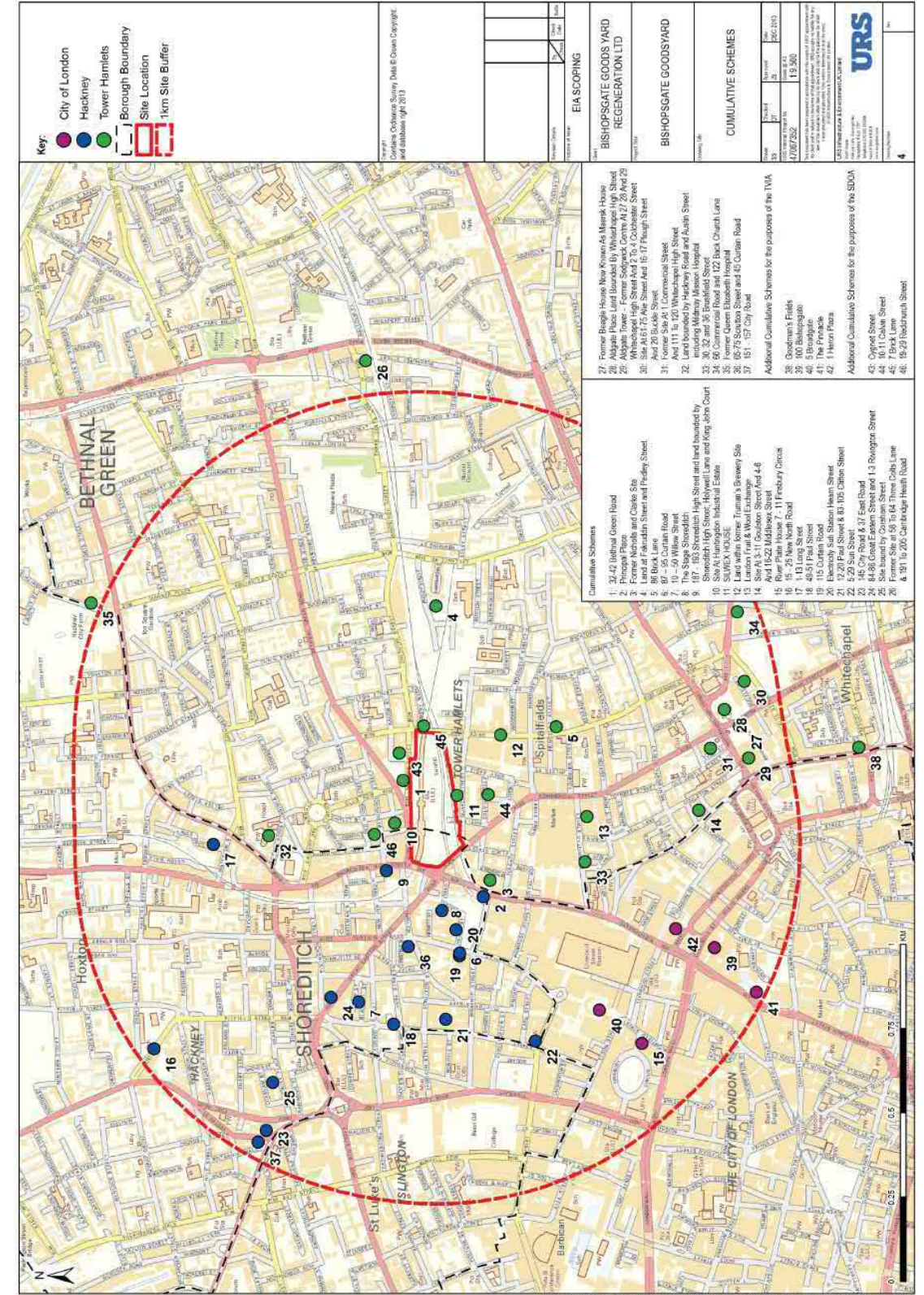
No	Address	Application Number	Description	Status
	London, E1			
29	Aldgate Tower - Former Sedgwick Centre At 27 28 And 29 Whitechapel High Street And 2 To 4 Colchester Street, Whitechapel High Street, London.	PA/01/1424	Refurbishment and extension of existing Marsh Centre building, demolition of remaining buildings and redevelopment to provide new office and retail accommodation	Permitted Jan 2004 – Completion 2014
30	Site At 61-75 Alie Street And 16-17 Plough Street And 20 Buckle Street, Alie Street, London	PA/07/1201 and PA/10/1096	Demolition of existing buildings and erection of two buildings of 7 and 28 storeys to provide 235 residential units, A1/A3 (retail/restaurant/cafe) floor space and B1(business), formation of associated car and cycle parking and highway access, hard and soft landscaping.	Permitted March 2008
31	Former Site At 1 Commercial Street And 111 To 120 Whitechapel High Street, Commercial Street, London	PA/05/229	Erection of a building comprising basement plus 23 storey building (with roof terrace) providing (i) parking, plant and 755m ² of Class A1, A2 or A3 (retail, office and food and drink) uses at basement level; (ii) 1,367m ² of either Class A1, A2, A3, D2.	Permitted August 2006
32	Land bounded by Hackney Road and Austin Street including Mildmay Mission Hospital, Hackney Road, London, E2 7NS	PA/09/2323	Demolition of existing buildings and structures and redevelopment to provide a campus of seven buildings from one to nine storeys in height providing 139 residential units, a new building for Mildmay Hospital (2,795 m ²), a new building for the Shoreditch Tabernacle Baptiste Church (423 m ²), a Class A1-A4/B1 Commercial Unit (72 m ²) fronting onto Hackney Road; new landscape amenity areas, parking servicing and cycle bay provision, highway works and all necessary enabling works.	Permitted September 2010
33	30, 32 and 36 Brushfield Street, London E1	PA/12/1853	Change of use of Unit 30 (ground floor) and Units 32 and 36 (ground and lower ground floors) from Use Class A1 (Shop) to either Class A1 (Shop), Class A2 (Financial and professional services), Class A3 (Restaurant /cafe), or Class A5 (Hot food takeaway)	Permitted October 2012
34	60 Commercial Road and 122 Back Church Lane	PA/10/1481	Demolition of existing building and erection of a 19 storey building plus basement to provide for plant room; 200 m ² retail/commercial/community unit (class A1/A2/A3/A4/B1/D1) at ground floor and student accommodation on upper floors (comprising 417 rooms).	Permitted December 2010
35	Former Queen Elizabeth Hospital, Hackney Road	PA/13/384	Demolition of all the buildings on the site apart from two facades of the building fronting Hackney Road; erection of two courtyard buildings of part 5, 6, 7 and 9 storeys to provide 188 residential units (C3 use) and 100 m ² (GIA) of flexible commercial/	(Current) Planning Application
36	65-75 Scrutton Street and 45 Curtain Road London EC2A 4PJ	2011/3593	Demolition of existing building(s) and redevelopment of the site to provide part 4, part 5, part 6-storey building (plus roof terrace) for mixed use development, comprising 6707 m ² of boutique hotel (Use Class C1), with ancillary conference centre, restaurant and cafe/bar; design studios (Use Class B1), parking (6 spaces), plant and associated works.	Permitted March 2012
37	151 - 157 City Road London EC1V 1JH	2009/2759	Erection of part 16, part 17, part 18, part 19, part 20 to 23 - storey building with three basement levels to provide 16,376 m ² Class C1 (4 Star hotel, 247 room) together with 838sqm class B1 business centre, restaurant, bar, 25 cycle spaces, plant and ancillary service facilities including vehicular access off Britannia Walk	Permitted January 2010
Additional Schemes to be considered for the purposes of the TVIA				
38	Goodman's fields	PA/11/03587	Considered for townscape and visual impact assessment	Permitted

No	Address	Application Number	Description	Status
	(LBTH)			
39	100 Bishopsgate (COL)	06/00796/FUL EIA	Erection of three buildings to comprise office (B1), retail (A1-A4), library (D1) and Livery Hall (Sui Generis) uses with associated public space and landscaping, disabled car parking, cycle parking, servicing and plant.	Permitted
40	5 Broadgate (COL)	10/00904/FUL EIA	Demolition of 4 and 6 Broadgate and redevelopment to provide a building of two basements, ground, mezzanine and 12 storeys plus roof top plant (maximum height 83.5m AOD) for B1 commercial office purposes (108,213 m ² GEA); the creation of a new pedestrian route from Broadgate Circle to Sun Street Passage; works of hard and soft landscaping to Finsbury Avenue Square, Broadgate Circle, Sun Street and Sun Street Passage; the provision of a revised access on Broad Lane; the provision of car, cycle and motorcycle parking in the basement; works to the exposed flank wall of 8-10 Broadgate; the creation of a new pedestrian route through the base of 3 Broadgate and the provision of plant and other works ancillary to the main building. This application is accompanied by an Environmental Impact Assessment.	Permitted
41	The Pinnacle (COL)	05/00546/FUL EIA	Demolition and redevelopment to provide a building arranged on 2 basement floors, ground and 59 upper floors (including 6 plant floors) comprising floorspace for use within Classes B1 and A of the Use Classes Order; the creation of new public realm and pedestrian routes; the provision of ancillary servicing and other works incidental to the development (135,511m ²).	Permitted
42	1 Heron Plaza (COL)	10/00152/FUL EIA	Alterations to 142- 150 Bishopsgate and 1-17 Devonshire Row (odd numbers), relocation of 1 Stone House Court and redevelopment of Stone House (128-140 Bishopsgate and 77-84 Houndsditch), Staple Hall (87-90 Houndsditch) and 1, 3 and 5 Stone House Court, to provide mixed use development comprising a luxury hotel, residential accommodation, retail uses (A1 - A3), hard and soft landscaping works including provision of a new public plaza, alterations to vehicular and pedestrian access and highways layout together with ancillary plant, servicing and associated works. 55,286 m ² . (GEA); 150.92m AOD (height).	Permitted
Additional Schemes for the purposes of the Sunlight, Daylight and Overshadowing Assessment				
43	Cygnets Street	PA/13/02529	Erection of a building up to six storeys to provide basement gym, ground floor commercial (Use Classes A1, A2, A3 and B1) and 39 dwellings above.	Submitted 29th Oct 2013
44	10-11 Calvin Street	PA/13/02111	Erection of part three, part four storey building comprising four dwelling houses (1x3 bed and 3x4 bed) and incorporating cycle parking and refuse/recycling facilities and private amenity space.	30 Aug 2013
45	7 Brick Lane	PA/11/02732	Demolition of existing brick wall structure and erection of a mixed use development of 1 to 4 storeys in height, comprising 7 residential units comprising 5 x 2 bedrooms and 2 x 3 bedrooms (Use Class C3) fronting Grimsby Street and 4 commercial units total	Permitted
46	19-29 Redchurch Street	PA/11/00297	Change of use of existing ground floor B1 (office) space to provide four A1 (retail) units and two car parking bays. Change of use of existing B1 (office) space at second floor to provide 9 flats (2 x 1-bed, 4 x 2-bed, 2 x 3-bed and 1 x 4-bed) over second,	Permitted

Note: Confirmed with LBH and LBTH on the 10th December 2013

EIA Scoping Report – Bishopsgate Goods Yard

Figure 7: Locations of Cumulative Schemes



6.9 Consideration of Climate Change within the EIA

6.9.1 The Proposed Development will be assessed against the forecast climate as detailed in the UK Climate projections 2009 for London, for 2050s under a medium emissions scenario (the main predicted conditions of which are summarised in Table 3). This is also the scenario which is used within The Mayors Draft Climate Change Adaptation Strategy for London (February 2010).

Table 3: UK Climate Projections 2009 for London (2050s medium emissions scenario)

Climatic Change	Description
Rising Temperatures	Summers will be warmer, with the average summer day 12 being 2.7°C warmer and very hot days 6.5°C warmer than the baseline average. By the end of the century the hottest day of the year could be 10°C hotter than the hottest day today. Winters will be warmer, with the average winter day being 2.2°C warmer and a very warm winter day 3.5°C above the baseline.
More Seasonal Rainfall	Summers will be drier, with the average summer 19 per cent drier and the driest summer 39 per cent drier than the baseline average. Winters will be wetter, with the average winter 14 per cent wetter and the wettest winter 33 per cent wetter than the baseline average.
Tidal surges	Tidal surges (see Chapter 3 for description) are not projected to increase in frequency, though the height of a one-in-fifty-year tidal surge is projected to increase by up to 70 cms by the end of the century.
Sea Level Rise	Sea levels are projected to rise by up to 90 cms by the end of the century. An extreme projection of a 2-metre increase has been generated using the latest ice-sheet modelling published after the IPCC (Intergovernmental Panel on Climate Change) Fourth Assessment report.

6.9.2 Climate change impacts, adaptation and mitigation measures will be considered within the appropriate sections of the ES and other supporting planning documents.

6.9.3 During the construction phase, the main measures to mitigate climate change will be considered in terms of reducing carbon dioxide (CO₂) emissions from equipment, and reducing, and reusing and recycling site waste where possible. This will be discussed in the Construction ES chapter. For design related construction impacts, such as the choice of building materials, this will be considered throughout the design process to reduce its impact on climate change. This is a key topic within the Code for Sustainable Homes (CfSH) methodology, for which the Proposed Development will seek to achieve a level 4 rating and therefore will be incorporated throughout the design process. Additionally the commercial elements of the scheme will target BREEAM 'Excellent', with a minimum rating of 'Very Good'.

6.9.4 For the operational phase, the potential for the Proposed Development to adapt to and mitigate climate change will predominately relate to reducing CO₂ emissions through reducing the need to travel (especially by car), reducing the amount of energy usage for heating, cooling and lighting, reducing the volume of water usage, and reducing the potential impacts from flood risk.

6.9.5 Further detail will be provided within the Energy and Sustainability Strategy and Flood Risk Assessment which will be submitted in support of the planning application.

6.10 Alternatives Assessment

6.10.1 The EIA process provides an opportunity to consider alternative development options with their respective environmental impacts before a final decision is taken on the design. In accordance with EIA regulations and statutory guidance, the ES will describe those alternatives, which were considered by the Applicant team and architects, including:

- A 'Do nothing' scenario - the ES will summarise the effects if the development does not come forward;

- Selection of the preferred form/massing in terms of visual and townscape considerations; and
- 'Alternative designs' – the ES will summarise the evolution of the current design proposal, the modifications which have taken place to date and the environmental considerations which have led to those modifications. A summary of the main alternatives considered, such as alternative use mixtures, floor heights, massing, and materials used will be presented together with a justification for the final design.

6.11 Demolition and Construction

6.11.1 The ES will provide details of the proposed demolition, and construction activities. Details of assumptions made will be included in the narrative.

6.11.2 Information will be provided on, but not limited to, demolition, excavation, site preparation and construction logistics including site access and egress, materials and waste management, land or soil remediation, welfare facilities and working hours.

6.11.3 Estimates of demolition wastes and excavation volumes and the quantities of materials to be used throughout the construction phase will be considered, and an estimate of the peak periods of daily heavy goods vehicle (HGV) movements will be provided.

6.11.4 An indicative construction programme will be identified and broken down into a number of timeslices to describe the main activities and allow the technical chapters to define and assess the impacts of a reasonable worst case scenario. The peak period or level of activity will be assessed in terms of traffic, noise and air quality impacts. The peak period will be defined on the basis of the maximum number of HGV movements and an indication of the plant and equipment location on site in relation to the demolition, excavation and construction boundary.

6.11.5 The ES will outline the broad content of the Site Waste Management Plan.

6.11.6 The ES will present the broad content of the Code of Construction Practice (CoCP) or Construction Environmental Management Plan (CEMP). The mitigation measures identified as a result of the demolition, excavation, site preparation and construction impact assessment will be presented within the ES for inclusion within the CoCP or CEMP. It is likely that specific mitigation measures will be defined to reduce impacts specifically on or arising from:

- Site preparation, demolition, excavation and construction traffic and workforce presence on site;
- Working close to neighbouring boundaries;
- Site access and egress (including mitigation for any loss of public right of way and road closures);
- Noise and vibration;
- Soil removal and land remediation;
- Ecology;
- Archaeology and heritage resources;
- Water usage and site drainage;
- Emission of dust and other pollutants; and
- Waste generation, management and disposal.

6.11.7 The mitigation measures and outline CoCP or CEMP will take account of LBTH 'Code of Construction Practice' (2006) and the GLA's guidance on 'The Control of Dust and Emissions from Construction and Demolition' (2006).

6.12 Waste and Recycling

Baseline Conditions

6.12.1 As a primary stage in the assessment process, an analysis of baseline conditions at the site, local/district (i.e. LBTH and LBH/North London Waste Authority (NLWA)), regional (i.e. London) and national (i.e. England) levels will be conducted to determine current volumes of waste generation, waste composition and waste management practices. Sensitive receptors pertaining to waste management aspects of the Proposed Development will also be identified during this stage which will be carried forward and used throughout the assessment process. The baseline assessment will include examination of the following data:

- Assessment of local authority collected waste (i.e. household waste, municipal waste, etc.), commercial and industrial (C&I) waste and construction and demolition (C&D) waste streams;
- Current levels of waste generation at the site, local/district/ regional and national levels. With regards to the site level, baseline information will be used where available, where it isn't available predictions will be made using British Standards 5906:2005 or local relevant guidance methods;
- Current trends in waste management practice at the site, local/district/ regional and national levels; and
- A review of available waste management facilities likely to be impacted by the Proposed Development.

Potential Impacts of the Development

6.12.2 The Waste and Recycling assessment will consider potential impacts arising from the generation and management of waste due to the Proposed Development. Both demolition and construction phase impacts and operational phase impacts will be considered as part of the assessment process. Potential impacts upon the following will be assessed:

- Demolition and construction site workers;
- End-users of the Proposed Development;
- Neighbouring users/occupiers of the Proposed Development; and
- Waste management infrastructure facilities.

Scope of the Assessment

6.12.3 The Waste and Recycling assessment will analyse all phases of the Proposed Development from demolition and construction through to completion and operation. The assessment will identify any potentially significant impacts that may arise due to waste, both pre-mitigation and following the implementation of mitigation measures. Specifically, this will include the following:

- A review of requirements placed upon the Proposed Development under national legislation and implemented policy at all levels of Government (i.e. national, regional and local). Further to this, a review of requirements placed upon the Proposed Development in accordance with local standards and guidance will also be conducted so as to ensure compliance with relevant objectives and targets, particularly with regards to calculating waste volumes, storage and capacity;
- A review of baseline conditions at the site, local/district, regional and national levels in relation to the current volume and composition of waste generated and waste management practices;

- An estimate of the type and quantity of waste likely to be generated as a result of the operational Proposed Development in line with local guidance documents;
- An assessment of potential impacts pre-mitigation relating to the type and quantity of waste expected to be generated by the Proposed Development during both the demolition and construction and operational phases. The impact significance will be a function of the volume of waste expected to be generated by the Proposed Development and its associated composition;
- An explanation of proposed mitigation measures recommended to be used by the Proposed Development. For the demolition and construction phase this will include an overview of the Site Waste Management Plan (SWMP). With regards to the operational phase, an outline of the operational waste management strategy will be included describing the proposed minimisation, segregation and recycling measures to be incorporated within the Proposed Development. Details regarding waste handling, storage area provision and waste collection arrangements will be provided. All waste reduction measures and compliance with British Standards, Duty of Care and local policies will be discussed;
- An assessment of any significant residual impacts due to waste that may arise following the recommendation of mitigation measures to be included into the Proposed Development. This will also consider any residual impacts to climate and climatic factors due to waste; and
- Consideration of any potentially significant cumulative impacts resulting from the Proposed Development in relation to waste.

6.13 Socio-Economics

6.13.1 The assessment will consider the socio-economic effects, both during the demolition and construction and once the Proposed Development is complete and operational.

Baseline Conditions

6.13.2 A review of the relevant policy at the local (LBH and LBTH), regional (Mayor of London, GLA) and national levels (in terms of urban regeneration and sustainable economic development) to identify the key issues of relevance to the Proposed Development will be undertaken.

6.13.3 The chapter will include a baseline assessment providing a description of the existing socio-economic conditions on and around the site including: population and labour force, skills and unemployment, housing and the local economy. The baseline assessment will also provide a review of the community and social facilities including: schools, primary healthcare facilities, community facilities, open space and child play space.

Potential Impacts of the Development

6.13.4 Specifically, due consideration will be given to the Proposed Development in terms of the following:

- The role of the scheme in the provision of private, intermediate and affordable housing including meeting the annual residential build target for LBTH and LBH;
- The role of the scheme in the generation of direct and indirect employment opportunities at the local and regional level, during construction and operation of the development;
- Net additional expenditure arising from new residents living within the scheme;
- Effects on social infrastructure in the area which could be used by future residents, including education infrastructure (schools), primary health care facilities (GP surgeries), community facilities, open space and child play space; and

- Other broader social and community effects of the scheme, including crime and safety, quality of life, community cohesion and amenity (cross-referring to other topics where relevant).

Scope of the Assessment

6.13.5 The scope and method for assessing socio-economic effects will follow standard EIA guidance and will involve:

- Consideration of policy constraints associated with the site and wider area;
- Assessment of the likely scale, permanence and significance of impacts associated with:
 - a) Direct, indirect and induced employment during the construction phase of the scheme;
 - b) Direct, indirect, and induced employment once the scheme is operational;
 - c) Broader social and community effects of the scheme; and
 - d) The development's effects on climate and climatic factors.
- Identification of avoidance and mitigation measures (if and where relevant) and a thus an assessment of the residual impacts of the development.

Determination of Significance and Classification of Effects

6.13.6 Policy thresholds and best practice are used to assess the significance of the effects. In the absence of specific guidance on assigning significance, professional judgement is used to assess the impact of the Proposed Development on the social and economic baseline. The assessment will aim to be objective and quantify impacts and their effects as far as possible; however some impacts can only be evaluated on a qualitative basis.

6.13.7 Effects will be assessed on the basis of:

- magnitude of change - this entails consideration of the absolute number of people or businesses affected and the size of area in which impacts will be experienced;
- scale of the impact - this entails consideration of the relative magnitude of each effect in its relevant context (for example, the impacts on local employment will be considered in the context of the overall size of the local labour market);
- scope for adjustment or mitigation - the assessment will be concerned in part with economies. These adjust themselves continually to changes in supply and demand, and the scope for the changes brought about by the Proposed Development to be accommodated by market adjustment will therefore be a criterion in assessing significance.

6.13.8 Following this analysis the resultant effect is classified in the following categories:

- negligible;
- minor beneficial/adverse;
- moderate beneficial/adverse; or
- major beneficial/adverse.

6.14 Ground Conditions

Baseline Conditions

6.14.1 In 2008, Concept undertook a comprehensive ground investigation of the site, including the chemical analysis of soils, leachate, and groundwater samples, and ground gas monitoring. The results of the ground investigation were compared to commercial screening criteria, which showed that there was no significant or widespread contamination identified on site.

6.14.2 As a result of this site investigation ARUP undertook a ground contamination risk assessment and outline remediation strategy for which it was considered that no further on-site work would be necessary.

6.14.3 An updated desktop ground condition assessment will be undertaken including a review of the previous site investigations, risk assessment and remediation strategy.

6.14.4 Description of the baseline conditions will be provided to include:

- Geological Conditions,
- Made Ground, Ground Conditions,
- Groundwater Conditions,
- Contamination Potential,
- Presence of any Underground Structures,
- Unexploded Ordnance (UXO); and
- Asbestos.

Potential Impacts of the Development Proposals

6.14.5 The ground conditions assessment will consider potential impacts of both demolition and construction phase and operational phase of the Proposed Development and mitigation measures will be identified where appropriate.

Scope of the Assessment

6.14.6 It is proposed that a desk-based assessment be undertaken to assess the potential for historic contamination and the risk to ground conditions from the Proposed Development. This would be a desk based assessment and would include the following:

- Review of the Legislative and Planning Policy Context, in the case of the Bishopsgate Goodsyards, this will include the key local plans and policies for the boroughs of both the LBH and the LBTH;
- Explanation of the Assessment Methodology and Significance Criteria;
- Purchase of third party information e.g. a current Landmark Envirocheck report and relevant BGS borehole logs;
- Review of previous site investigation reports including the ground contamination risk assessment and outline remediation strategy;
- Site visit to determine the environmental sensitivity and current potential for contamination at the site and the immediate surrounds;
- Assessment of the potential impacts (both demolition and construction phase and operational phase of the Proposed Development) and recommendations of further mitigation measures (e.g. a Phase 2 Site Investigation (SI) prior to demolition and construction, soil classification testing, verification testing etc.);
- Where URS considers impacts not to be significant, justification will be provided as to why they should be 'scoped out' of the Ground Conditions Chapter; and
- Assessment of residual and cumulative impacts.

6.15 Traffic and Transport

Baseline Conditions

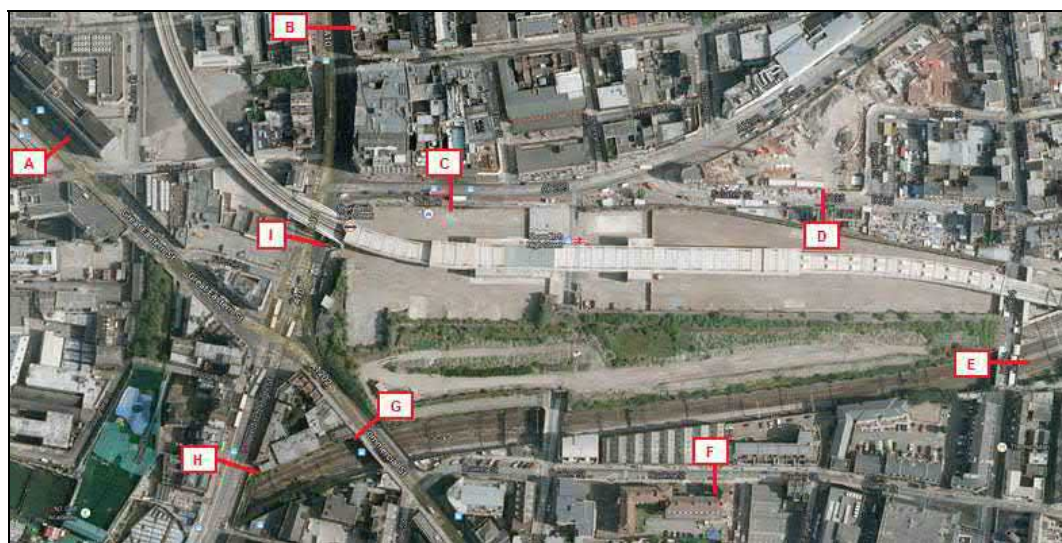
6.15.1 It is intended for the following baseline surveys of traffic flows and pedestrian flows to be undertaken on the network surrounding the site. This is also set out within a Transport Assessment Scoping Report which has been issued to officers of TfL, LBH and LBTH. It is intended for a pre-application meeting to be undertaken over the next week or so to agree the scope of highway and transport works.

Traffic Survey Data

6.15.2 It is proposed to undertake Automatic Traffic Counts (ATCs) on key links surrounding the site to determine network peak hours across the week. The proposed ATC locations are described below and illustrated at Figure 8.

- A – Great Eastern Street west of Holywell Lane;
- B – Shoreditch High Street north of Redchurch Street;
- C – Bethnal Green Road east of Shoreditch High Street;
- D – Sclater Street between Bethnal Green Road and Cygnet Street;
- E – Brick Lane between Grimbsby Street and Quaker Street;
- F – Quaker Street between Grey Eagle Street and Wheler Street (aka Braithwaite Street);
- G – Commercial Street between Quaker Street and Shoreditch High Street;
- H – Shoreditch High Street between Commercial Street and Folgate Street; and
- I – Shoreditch High Street between Bethnal Green Road and Commercial Street.

Figure 8: ATC Locations



6.15.3 It is proposed to undertake video surveys at key junctions surrounding the application site. The video surveys will be used to determine classified turning counts at all junctions within the study area, and queue lengths at all signal controlled junctions within the study area. Saturation Flow, Degree of Saturation and signal timings will also be recorded in accordance with TfL guidance for signalised junctions. Detail of the study area is set out below.

1. Shoreditch High Street/Holywell Lane/Bethnal Green Road;
2. Bethnal Green Road/Sclater Street;
3. Sclater Street/Brick Lane/Cheshire Street;

4. Brick Lane/Quaker Street/Buxton Street;
5. Commercial Street/Elder Street/Quaker Street;
6. Commercial Street/Shoreditch High Street/Great Eastern Street; and
7. Great Eastern Street/Holywell Lane.

Figure 9: Traffic Survey Locations



6.15.4 The ATC survey data would be analysed in the first instance to determine weekday AM and PM, Saturday and Sunday peak hour periods. Traffic data would then be obtained from the video surveys for each of the respective peak periods (1.5 hour peak periods for modelling purposes). The preceding traffic surveys will be reviewed to determine baseline traffic flows and form the basis of the Transport Assessment.

Pedestrian Survey Data

6.15.5 An assessment will be undertaken to demonstrate existing footway demand and capacity at key links in proximity to the site. Specifically, independent surveys will be commissioned to record directional pedestrian flow at 15-minute at the following locations.

1. Shoreditch High Street Station - directional entry and exit pedestrian flow adjacent to the station frontage will be recorded. The direction of pedestrian flow at the Braithwaite Street/Bethnal Green Road junction will also be recorded;
2. Northern and southern footways of Bethnal Green Road, between Sclater Street and Shoreditch High Street;
3. Northern and southern footways of Sclater Street between Bethnal Green Road and Brick Lane;
4. Eastern and western footways of Brick Lane between Sclater Street and Quaker Street;
5. Eastern and western footways of Shoreditch High Street between Great Eastern Street and Bethnal Green Road;
6. Northern and southern footways of Commercial Street between Quaker Street and Shoreditch High Street;
7. Northern and southern footways of Quaker Street between Commercial Street and Brick Lane; and

8. Signal controlled crossings and informal crossing points on Shoreditch High Street between Great Eastern Street and Bethnal Green Road.

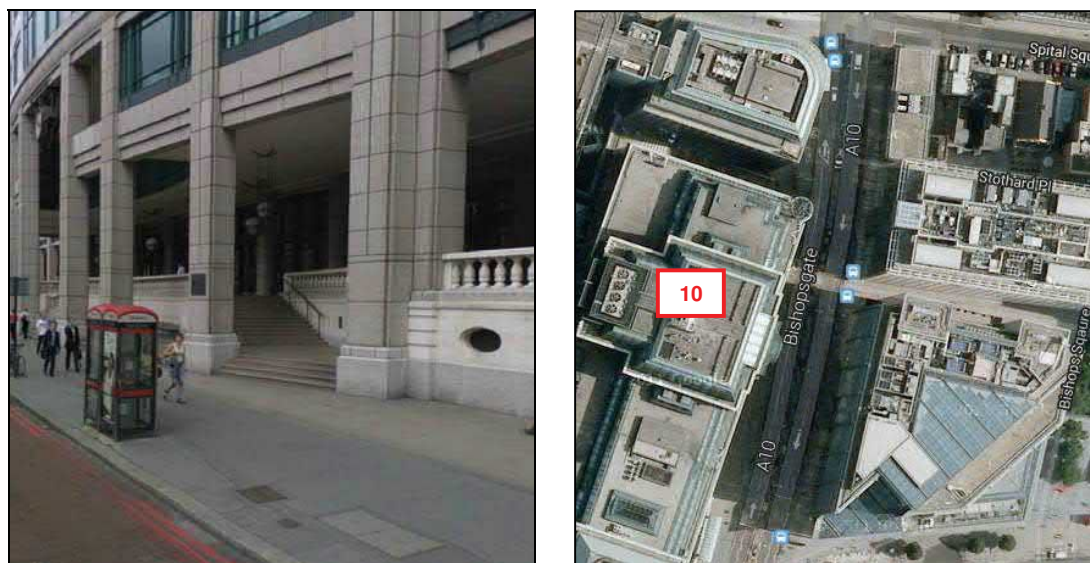
6.15.6 A diagram of the proposed pedestrian survey locations is shown at Figure 10.

Figure 10: Proposed Pedestrian Surveys



6.15.7 In addition to the above area immediate to the application site, it is also intended to include pedestrian counts by direction for the upper and lower walkways of Bishopsgate to the north of Liverpool Street Station as per Figure 11, which were identified as the most constrained sections of footway with high peak flows in our studies for the nearby Principal Place office scheme (Worship Street).

Figure 11: Proposed Pedestrian Surveys Continued



6.15.8 It is intended for the pedestrian surveys to be undertaken during the following time periods:

- Weekday 0730-0930, 1200-1400 and 1630-1930 (all Locations);
- Saturday 1200-1500 and 1630-1930 (locations 1, 2, 3, 4 and 5); and
- Sunday 1100-1400 (Locations 1, 2, 3, 4 and 5).

6.15.9 Pedestrian surveys of the existing Boxpark facility will be undertaken to identify the existing level of trips associated with this facility and the direction of travel to and from the facility. There are 41 Boxpark retail units with 41 separate ground floor entrances. It may be difficult to survey arrival and departure movements across all entrance points given the anticipated footfall along the footway on the southern site of Bethnal Green Road with the presence of Shoreditch High Street station. There is also the potential for an element of double counting should a customer wish to visit several of the units during a single trip.

6.15.10 On this basis, it is intended for a survey to be undertaken to record arrival and departure movements to and from a proportion of the units during peak hour periods (i.e. 10 of the entrance points). The survey data can then be factored accordingly to provide an indication of pedestrian movements associated with the whole of the Boxpark retail units. In addition, it is intended for a questionnaire survey to be undertaken by customers to the units to determine the approximate proportion of primary trips and proportion of customers whereby their visit forms part of a linked trip.

6.15.11 The results of the traffic and pedestrian surveys will be used to establish the baseline conditions on the surrounding highway and transport networks with the existing site use.

Potential Impacts of the Development Proposals

- 6.15.12 The key transportation issues are considered to be:
- Accessibility of the site and interaction with the surrounding highway and transport networks;
 - Policy compliance;
 - Justification of on-site parking level (including cycle parking and disabled car parking),
 - Justification of servicing and refuse collection provisions, including production of a Delivery and Servicing Plan;
 - Identification of the number of additional trips generated by the development during peak periods in actual terms and relative to the existing site use;
 - The trips generated by the development will be distributed onto the surrounding highway and transport networks;
 - Effect of the development proposals on pedestrian and cycle infrastructure and local public transport services;
 - Consideration of the design of pedestrian routes through the site in context with the existing arrangement and potential future changes in footfall;
 - Effect of the development proposals upon existing and future junction capacity;
 - Assessment of effect upon on-street parking supply;
 - Identification of any existing highway safety issues;
 - Construction traffic generation; and
 - Mitigation measures and proposals for encouraging sustainable travel, including an assessment of the Shoreditch High Street (A10)/Commercial Street (A1202) junction to determine if improvements to the arrangement of the footway adjacent to the site is necessary, and the preparation of a Travel Plan for all land uses within the site.

Scope of the Assessment

6.15.13 This Traffic and Transportation chapter of the Environmental Statement (ES) will report the findings of an assessment of the transport effect of the Proposed Development, during demolition, construction and operational phases, on the surrounding highway and transport networks.

- 6.15.14 The chapter will also review relevant planning policy documents at a national, regional and local level that have been considered in respect of the Proposed Development. The chapter will conclude with the identification of mitigation measures, along with an assessment of residual effect.
- 6.15.15 The data and analysis within this chapter will be based upon the Transport Assessment which will be submitted as part of the planning application documents. The Transport Assessment will be produced to assess the impact of the Proposed Development on the surrounding highway and transport networks. The proposed scope of assessments for inclusion within the Transport Assessment will be driven by the delivery of the key issues outlined above. As mentioned, a Transport Assessment Scoping Report has been prepared and issued to TfL, LBH and LBTH for agreement. It is expected that formal pre-application consultation process will commence in the next week or so.
- 6.15.16 As the development proposals are referable to the Greater London Authority (GLA), the Transport Assessment will be prepared in accordance with TfL's Transport Assessment Best Practice Guidance document (April 2010); as well as National Planning Policy Framework (2012), the DfT Guidance on Transport Assessment document (March 2007) and specific LBH and LBTH requirements.
- 6.15.17 The Traffic and Transportation chapter of the ES will set out the methodology applied to assess the potential effects of the Proposed Development in terms of transportation and access. The scale and extent of the assessment will be defined in accordance with Institute of Environmental Assessment (IEA) Guidelines (IEA (now IEMA) 1993 Guidelines for The Environmental Assessment of Road Traffic). Guidance provided by the IEMA and Department for Transport (DfT) will be consulted in order to identify significance criteria applicable to the assessment. Where there are no ready thresholds of significance, case interpretation and judgement will be applied based on knowledge of the site or quantitative data where available.
- 6.15.18 A full review of the baseline conditions observed on the surrounding highway and public transport networks will be undertaken. The baseline studies will include a review of the existing levels of accessibility of the site and will also consider all relevant committed developments within the surrounding area.
- 6.15.19 Separate to a Transport Assessment, it is also intended for a Pedestrian Environment Review System (PERS) Audit to be undertaken, the scope of which is to be agreed with TfL. A thorough review of baseline site accessibility will inform any improvement works necessary in the area.
- 6.15.20 A robust assessment of the trip generation of the Proposed Development based on a review of comparable site specific surveys included within the TRAVL database/relevant site specific surveys commissioned by WSP UK Ltd. The scope and location of supplementary trip generation surveys will be agreed with LBH, LBTH and TfL.
- 6.15.21 The assessment will demonstrate how the development accords with relevant policies (and underlying justification) within the London Plan, and LBH/LBTH adopted policy documents.
- 6.15.22 The effect of the development proposals on each mode of transport will also be assessed in detail with mitigation measures being proposed, where appropriate. The effect of the development will be assessed with regard to; severance, delay, fear and intimidation, amenity, and accidents and safety, in accordance with IEMA guidance.
- 6.15.23 The Transport Assessment Scoping Report details the hybrid nature of the planning application for the application site, with four plots of land to be detail and the remaining outline. The assessment of the highway and transport networks would be undertaken on this basis.
- 6.15.24 Consideration of the impact of construction traffic will also be included within the Transport Assessment. Moreover, it is intended for a Construction Logistics Plan to be prepared as a separate document for the planning application, which would detail likely construction traffic routes.

- 6.15.25 The output for the Transport Assessment will identify the development impacts, the severity of the impacts and any necessary mitigation; as well as describing the transportation benefits that the scheme will deliver. The Transport Assessment Scoping Report includes a preliminary assessment of predicted percentage traffic impact on local links.
- 6.15.26 A Travel Plan will be provided within the Transport Assessment for both the residential and commercial land uses within the site. The Travel Plans will be produced in accordance with current DfT, TfL and LBH/LBTH guidance and will include proposed measures to encourage and promote sustainable methods of transport.
- 6.15.27 Relevant committed developments located within the area surrounding the site will be considered within the Transport Assessment. The specific committed developments to be included within the assessment will be agreed with LBH/LBTH and TfL through the scoping study produced for the Transport Assessment. The ES chapter will be produced using the information contained within the Transport Assessment and Travel Plan.
- 6.16 Wind Microclimate**
- Baseline Conditions
- 6.16.1 To understand the baseline conditions at the site a scale model will be constructed reflecting the existing buildings currently occupying the site and their surroundings. This scale model will be tested in a boundary layer wind tunnel test facility. Mean and peak wind speeds will be measured around the base of the buildings forming the Proposed Development and other surrounding buildings, paths, roads, and areas of open spaces, for all wind directions. These results will be combined with long-term meteorological climate data for the London area. This will establish an accurate version of the baseline conditions on the site.
- Potential Impacts of the Development Proposals
- 6.16.2 Given the size and geometry of the Proposed Development, in addition to the Site's location in relation to surrounding buildings and nearby areas of public realm, it is important to avoid undesirable wind speeds being generated at ground level.
- 6.16.3 Undesirable wind speeds could make some spaces within and around the Proposed Development uncomfortable or unsafe for pedestrian use.
- 6.16.4 The ES will therefore quantify the potential changes to the local wind environment (both on-Site and within the surrounding area) in terms of pedestrian amenity and public open space and quantify these in relation to their 'usability' for a range of pedestrian activities defined by the Lawson Comfort Criteria.
- 6.16.5 Scale models (1:300) will be built of the following scenarios:
1. The buildings currently occupying the Site and the existing surrounding buildings / area (the baseline);
 2. An interim construction scenario, to be confirmed as the scheme develops;
 3. The complete Proposed Development massing occupying the Site and the existing surrounding buildings / area; and
 4. The Proposed Development's massing occupying the Site, and the surrounding buildings / area including the massing of nearby cumulative schemes.
- 6.16.6 The models will be manufactured and tested in a boundary layer wind tunnel test facility. Mean and peak wind speeds will be measured around the base of the buildings forming the Proposed Development and other surrounding buildings, paths, roads, and areas of open spaces, for all wind directions. These results will be combined with long-term meteorological climate data for the London area.

Scope of the Assessment

- 6.16.7 The results of this analysis will then be benchmarked against the Lawson Comfort Criteria to determine the suitability of the different areas both within and surrounding the Site for sitting, standing, entering a building, leisure walking, business walking or crossing the road. The suitability of the conditions both within the Site and surrounding the Site will be presented and discussed within the ES. Should mitigation measures be required to ensure that wind conditions are suitable for their intended use, the areas requiring mitigation will be identified and mitigation measures will be developed. Where necessary, mitigation measures will be tested through additional rounds of wind tunnel studies. The potential for strong winds to occur will also be quantified.
- 6.16.8 Through the determination of the suitability for use of the areas surrounding the Site (for scenarios 3-4 identified above), a direct comparison can then be made with the baseline / existing off-site conditions, and the effect to these surrounding areas assessed, with the significance of effects identified.
- 6.16.9 The results of all of the above assessments will be presented within the ES Chapter.
- 6.16.10 Selected roof terraces and balconies will be tested within the wind tunnel in order to determine the suitability of these areas for future residents. Although the assessment of these spaces will be completed for all seasons, the focus will be on the wind microclimate during the summer when these areas are more likely to be frequently used.

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

- 6.17.1 The proposed development has been influenced by the location of neighbouring residential properties and in order to minimise the impact upon neighbours the greatest height and density is located at the western end of the site where there are fewer residential neighbours and the development reduces in height as it moves east toward Brick Lane where there are a greater number of residential neighbours. Additionally the scheme, where possible, has been arranged in parallel blocks oriented in an N-S direction to allow daylight sunlight to pass between the blocks. Most recently GIA has looked at some localised changes to the evolving massing in order to mitigate some of the more material daylight and sunlight issues as part of the evolving scheme.

Baseline Conditions*Daylight and Sunlight*

- 6.17.2 For the baseline assessment the daylight and sunlight conditions for each surrounding residential property, will be assessed in accordance with the current site conditions. This baseline condition will be assessed using the various daylight and sunlight methods described in the BRE Guidelines (VSC, NSL and APSH methods). The daylight and sunlight analysis will be calculated from the 3D computer model based upon specialist software.
- 6.17.3 The 'Universe' of neighbouring properties that will form the subject of technical analysis is set out at Fig. 12 (1.1.47)
- 6.17.4 There are a number of recently constructed, but currently unoccupied, neighbouring residential properties (for example, The TelfordHome scheme on Sclater Street). These achieved planning consent in anticipation of the redevelopment of the 'The Goodsyards'. It is proposed to evaluate the quality of light within these residential units on the basis of the ADF daylight methodology and APSH sunlight methodology as standalone Appendices.

- 6.17.5 The assessment of the daylight and sunlight within the proposed development ('internal daylight and sunlight report') will not form part of this chapter. This will be presented as a separate standalone report submitted with the planning application and contained as an Appendix to the ES. The assessment of internal daylight and sunlight will be based upon the British Standard Code of practice for daylighting (BS 8206-2 2008) as well as the BRE Guidelines. The assessment will cover the detailed parts of the planning application. Internal daylight and sunlight studies are not concerned with a baseline condition as they deal with ex novo accommodation and amenity areas which are not yet inhabited or experienced by occupants or form part of the environment. As such it is not possible to assign significance to the effect the proposed development will have without comparing this with an existing condition as per the methodology and significance criteria that will be adopted within this chapter.
- 6.17.6 Instead, the adequacy of the quality of light within the proposed accommodation will be evaluated based upon the ADF daylight methodology, measured against BRE and BS Standards. Where possible this will be by reference to actual room layout plans and technical analysis in relation to either the most challenging locations and/or more widely across the scheme proposal, or VSC façade studies where detailed internal arrangements are not yet known.
- 6.17.7 Due to the hybrid nature of the application, the outline component of the proposal will be assessed against levels of daylight potential (VSC) and sunlight potential (Annual Probable Sunlight Hours). Both studies will be carried out on the proposed block massing facades and will be accompanied by guidance that will help with the future development of a reserved matter or detailed submission. These façade tests will be carried out on the maximum parameter massing and potentially an indicative massing if available.
- 6.17.8 The detailed application component will be assessed against Average Daylight Factor, No-Sky Line, Room Depth Criterion and Annual Probable Sunlight Hours as suggested within the BS8206 2 and the BRE Guidelines.
- Sun on Ground*
- 6.17.9 With regards to the relevant surrounding amenity space, the sun hours on ground/permanent shadow will be assessed on 21 March, in accordance with the BRE Guidelines.
- 6.17.10 In terms of the internal daylight and sunlight sun-on-ground/permanent shadow studies, there can be no baseline assessment for the amenity areas within the proposed development as these do not yet exist. Nonetheless, all proposed amenity areas will be assessed for levels of sun hours on ground as suggested by the BRE Guidelines.
- Transient overshadowing*
- 6.17.11 Transient overshadowing will be mapped for the following three key dates in the year with regards to the baseline conditions:
- 21 March (Spring Equinox);
 - 21 June (Summer Solstice); and
 - 21 December (Winter Solstice).
- Light pollution*
- 6.17.12 The assessment of light pollution will consider the potential effects of the proposals on surrounding residential receptors and within the proposed development in absolute terms and not against baseline conditions.
- 6.17.13 The assessment of light pollution will be limited to the effects of the detailed component of the scheme only. Of this component only the office elements and, where available, exterior lighting features, will be considered suitably detailed for study. Their impact will be assessed upon all existing and proposed residential receptors.

6.17.14 The outline component of the scheme will not be sufficiently detailed to undertake a light pollution study, as no façade details or internal uses and layouts will accompany the outline application. The latter will be available at reserved matters stage and should be assessed then.

Solar glare

6.17.15 The existing buildings on the site under baseline conditions are typically low rise with little or no glazing or have been demolished. Under these conditions, due to the lack of reflected surfaces it is not considered that the existing structures on site will produce any detrimental effects as a result of reflected solar glare.

6.17.16 Therefore the assessment of solar glare will consider the potential effects of the proposals on the chosen viewpoints in absolute terms and not against baseline conditions.

6.17.17 As per the assessment of light pollution, the outline component of the proposed development will not be sufficiently detailed to undertake a solar glare study, as no façade details or internal uses and layouts will accompany the outline application. The latter will be available at reserved matters stage and should be assessed then. Similarly, the study of solar glare is applicable only to highly glazed facades.

Cumulative Conditions

6.17.18 An assessment will be conducted to determine the extent of the effect of the proposed scheme upon the neighbour's daylight, sunlight and sun-on-ground/permanent shadow to amenity space, within the context that other consented schemes or 'reasonably foreseeable' schemes have been constructed. To evaluate the effect, a technical analysis will be undertaken which compares the existing undeveloped 'Goodsyards' site plus neighbouring consents against the developed 'Goodsyards' site plus neighbouring consents. Technical analysis will be undertaken in accordance with BRE methodology.

Scope of the Assessment, Potential Impacts of the Development

6.17.19 The likely significant effects of the proposed development on daylight, sunlight, overshadowing, light pollution and solar glare will be assessed with respect to all relevant criteria mentioned above.

6.17.20 It is proposed to submit a hybrid application with 'detailed' and 'outline' elements within the same application. The outline element of the application assessed for the purposes of this chapter will be the maximum building parameter, and as such the proposed development massing assessed will be the worst case scenario. The maximum building parameter may not be fully built out to the potential maximum floor space limits imposed and may be a hypothetical situation. The intention of the maximum building parameters is to provide variety in the proposed development as it comes forward, which will obviously be subject to a reserved matters application.

6.17.21 In view of the above, the maximum building parameter assessments will be supported by an indicative scheme which demonstrates how the parameters could be interpreted by showing the potential locations of buildings, uses and open spaces.

6.17.22 This will present a more realistic picture of the likely daylight, sunlight, overshadowing and sun hours on ground effects once the entire proposed development is complete.

6.17.23 It is not proposed that phasing effects are assessed with regards to neighbouring receptors as the assessments described above will present the worst case scenario, though it is understood that the London Borough of Tower Hamlets wish to understand the effect of the construction of just those buildings which occupy their borough and a standalone analysis will be undertaken on that basis.

6.17.24 The likely effects of the completed development are as follows: -

- The potential loss of daylight availability, which could reduce the quality of interior daylight and increase the need for artificial light;
- The potential loss of sunlight availability due to increased shadowing effects arising from the scheme which could cause a reduction in perceived brightness and warmth;

- The potential for occupants and users of affected sensitive areas (e.g. residential properties) to notice a reduction in the quality of natural light (sunlight and daylight), arising from the scheme which may give rise to complaint;

- The potential for an increase in the amount of artificial lighting produced during the hours of darkness which may have an effect upon the sleeping patterns of surrounding residents; and

- The potential for instances of reflected sunlight occurring at sensitive locations around the site causing temporary blindness to drivers and pedestrians.

6.17.25 Once these effects have been established then mitigation measures will be suggested to reduce negative effects where appropriate.

6.17.26 Where necessary, the chapter will assesses cumulative effects of other nearby proposed developments that could result in material impacts, and the effect upon those Consented or 'Reasonably Foreseeable' schemes that would or could be constructed in the vicinity where they contain additional sensitive receptors.

6.17.27 Where necessary, and in accordance with the BRE Guidelines, additional assessments of the proposed scheme will compare and contrast with any current extant planning permission for the site.

6.17.28 Where necessary, and in accordance with the BRE Guidelines, additional daylight and sunlight studies will be carried out which result in alternative benchmark values. For example, a 'mirror-image' assessment as described in Appendix F of the BRE Guidelines may be appropriate or, assessing neighbouring residential buildings without restrictive balconies may be relevant.

6.17.29 Additionally, and in this particular case, additional assessments may be carried out with the IPG as a baseline/benchmark. The proposed scheme can then be compared and contrasted with the likely impacts of the IPG.

6.17.30 The effects will be graded as follows:

Daylight and Sunlight

6.17.31 The results of the daylight and sunlight assessments will be compared against the criteria set out in the BRE Guidelines. Where results show compliance with the BRE Guidelines criteria the potential effect will be considered to be negligible.

6.17.32 The assessment criteria specified within the BRE Guidelines only suggests where a change in daylight would be noticeable to the occupants. It does not further define effects beyond this. As such, for the purposes of the assessments in this chapter, effects beyond the levels suggested by the BRE Guidelines will be defined as adverse or beneficial depending upon whether the property will be more or less favourable than the existing situation.

It has been agreed that the alterations in excess of BRE permitted 20% change will be defined as 20.10%-30% = Minor; 30.01%-40% = Moderate; 40%+ = Substantial. Where there is tension between daylight analysis methodology and technical results professional judgement will be applied to evaluate and determine a suitable significance criteria.

Sun on Ground

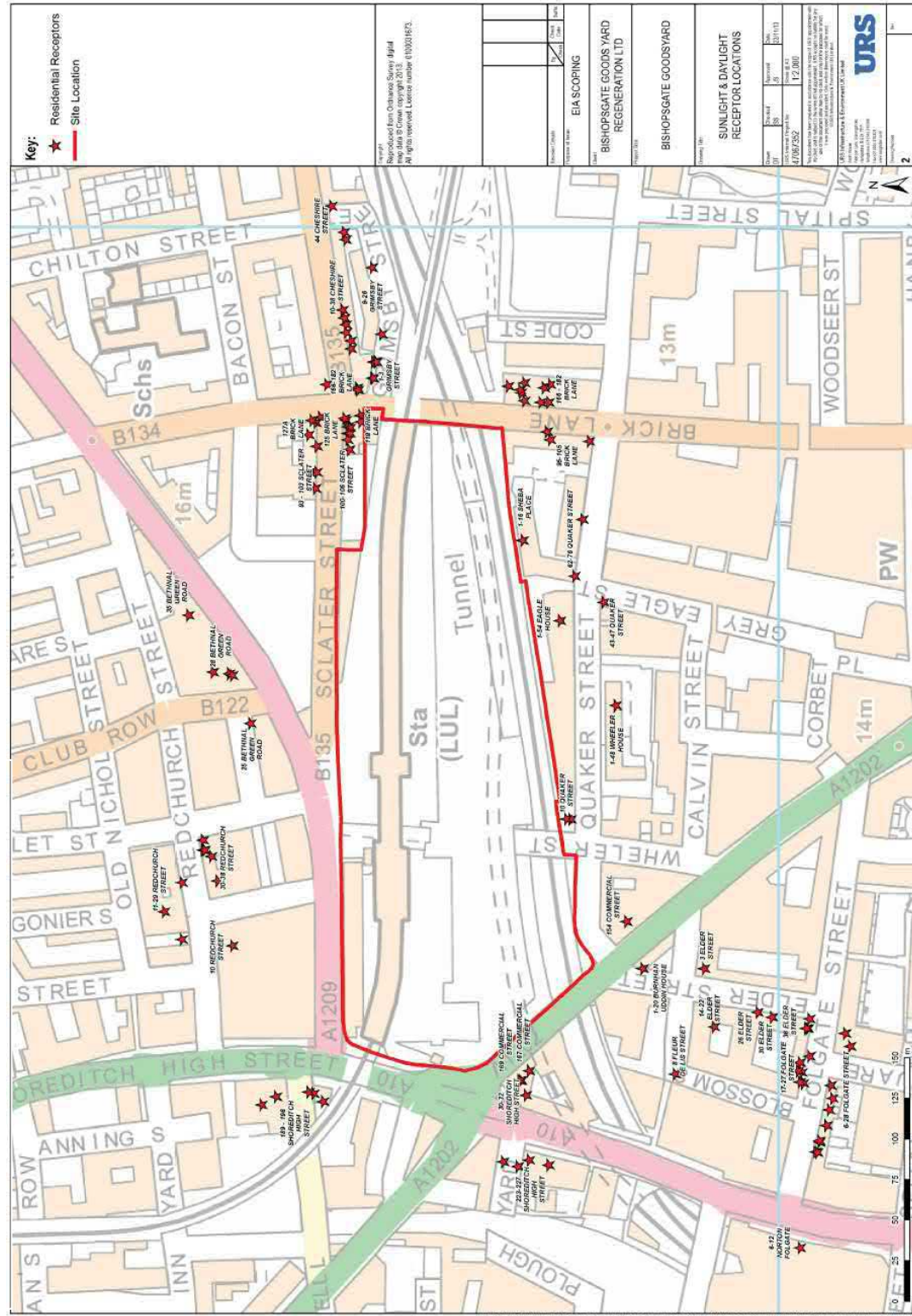
6.17.33 The BRE Guidelines recommend that for a garden or amenity area to appear adequately sunlit throughout the year, at least 50% of an amenity area should receive at least 2 hours of sunlight on 21 March. The BRE Guidelines also suggest that if, as a result of a new development, an existing garden or amenity area does not meet these guidelines, and the area which can receive some sun on the 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable.

6.17.34 Where the results show compliance with the BRE Guidelines criteria, the potential effect will be considered negligible since the BRE Guidelines indicate that the occupants are unlikely to experience any noticeable change to their sunlight amenity levels.

- 6.17.35 Appendix I of the BRE Guidelines states that: “adverse effects occur when there is a significant decrease... in the amount of sunlight reaching an open space...The assessment of impact will depend on a combination of factors, and there is no simple rule of thumb that can be applied.” Nonetheless, the BRE Guidelines outline factors tending towards minor and major adverse effects for sun hours on ground.
- 6.17.36 Similarly to daylight and sunlight, professional judgement will be used to establish whether a potential effect would be of minor adverse, moderate adverse or major adverse and beneficial significance.
Transient overshadowing
- 6.17.37 The BRE Guidelines provide no criteria for the significance of transitory overshadowing other than to suggest that by establishing the different times of day and year when shadow would be cast over surrounding areas, this provides an indication as to the significance of the potential effect of a new development.
- 6.17.38 The assessment of transient overshadowing effects will therefore be based upon expert judgement, taking into consideration the potential effects of the baseline conditions and comparing with the potential transient overshadowing effects of the proposals.
- 6.17.39 Similar to the sun hours on ground assessment, the effect will be classed as either beneficial or adverse, and of minor adverse, moderate adverse or major adverse significance.
Light pollution
- 6.17.40 A detailed external lighting scheme has not been developed as yet. It is not anticipated that decorative external lighting, upward looking luminaires or focal lighting will form part of such an external lighting scheme.
- 6.17.41 Accordingly, to enable an assessment of likely light spill/pollution effects, an internal illuminance level equating to an average of 400 lux at desk height has been agreed with the architect. The agreed maximum lighting values correlate to the lighting levels suggested by Lighting of Work Places- Part 1: Indoor Work Places, British Standard (BS) 12464-2: 2002.
- 6.17.42 Potential light spill/pollution impacts of a Proposed Development are typically assessed in relation to four specific factors: Sky Glow; Light Trespass; Glare / Source Intensity; and Building Luminance. These are explained more fully below:
- Sky Glow is the brightening of the night sky over our towns, cities and countryside. It can be quantified by measuring the Upward Light Ratio (ULR), which is the maximum permitted percentage (%) of luminaire flux for the total installation that goes directly into the sky;
 - Light Trespass is the spilling of light beyond the boundary of a Proposed Development. It is assessed as vertical illuminance in lux (Ev) measured flat at the centre of the sensitive receptor;
 - Glare/Source Intensity is the uncomfortable brightness of a light source when viewed against a dark background. It is applied to each source visible from a sensitive receptor and is measured as source intensity (I) (kcd); and
 - Building Luminance can cause an increase in the brightness of a general area and is measured in cd/m² (L) as an average over the building facade caused only by external lighting.
- Sky Glow Assessment Approach*
- 6.17.43 In this assessment approach, luminance distribution data provided by the light fitting’s manufacturer is used to calculate the proportion of light which may be emitted directly into the sky for each fitting type. This information is then used to calculate the total sky glow (ULR). In this instance and given the absence of a detailed internal lighting scheme, the luminaires assumed for the Proposed Development represent a typical office interior downlighter.
- 6.17.44 In the absence of a detailed external lighting scheme a Sky Glow assessment has not been undertaken in this instance.

- Light Trespass Assessment Approach*
- 6.17.45 In this assessment approach the sensitive receptors are specified as the windows of residential properties in close proximity to the site. In the proposed scenario virtual sensors are placed on the windows of residential buildings surrounding the new development. The sensors then calculate the incident illuminance to this point.
- 6.17.46 In the absence of a detailed internal lighting scheme, a typical office lighting scheme layout which will provide average illuminance levels on the working plane of 500lux, have been assessed. These values are suggested by Lighting of Work Places – Part 1: Indoor Work Places, British Standard (BS) 12464-2:2002.
Glare Assessment Approach
- 6.17.47 A virtual camera is positioned at the location of each fitting likely to cause an instance of intensity greater than that recommended. The distribution data of the fitting in question is then interrogated so as to identify the angles within which the levels of intensity will be greater than recommended.
- 6.17.48 In the absence of a detailed external lighting scheme a glare assessment will not be undertaken.
Building Luminance
- 6.17.49 In this assessment approach, a false colour luminance picture is produced showing the luminance (cd/m²) of the facades of the proposed building. This data is then averaged to assess compliance.
- 6.17.50 In the absence of a detailed external lighting scheme a Building Luminance assessment will not be undertaken.
Spatial Scope
- 6.17.51 The daylight and sunlight assessments will cover the residential receptors surrounding the site as listed below and shown on Figure 12:
- | | |
|---------------------------------------|---|
| 7 and 25 Bethnal Green Road | 17-27 Folgate Street |
| 28-36 Bethnal Green Road | 6-28 Folgate Street |
| 95-105, 119, 125A and 127A Brick Lane | 1-3 and 9-26 Grimsby Street |
| 166-182 Brick Lane | 6-12 Norton Folgate |
| 1-20 Burhan Uddin House | 10 and 62-76 Quaker Street |
| 7-22 Quaker Street | Buildings on the north side of Calvin Street |
| 10-38 and 44 Cheshire Street | 43-47 Quaker Street |
| 154 Commercial Street | 10 and 30-38 Redchurch Street |
| 167-169 Commercial Street | 11-29 Redchurch Street |
| 1-54 Eagle House | 93-103 Sclater Street |
| 3 Elder Street | 100-106 Sclater Street |
| 14-22, 26, 30 and 36 Elder Street | 1-16 Sheba Place |
| 8 Fleur De Lis Street | 30-32, 189-196 and 223-227 Shoreditch High Street |
| 1-48 Wheeler House | 27 Wheeler House |
- 6.17.52 The assessment may cover other relevant residential properties depending on the results of a site visit which is due to take place in the near future.
- 6.17.53 Any nearby public amenity areas that could be potential impacted will be assessed.

Figure 12: Sunlight & Daylight Receptor Locations



6.18 Air Quality

Baseline Conditions

6.18.1 The LBTH and LBH have both declared their entire borough an Air Quality Management Area (AQMA), due to the elevated annual mean concentrations of nitrogen dioxide (NO₂) and LBTH also for exceedances of the 24-hour mean particulate matter (PM₁₀) objective. The data sources that will be considered in the baseline conditions review will include LBTH and LBH air quality monitoring and background map information. The review indicates that 2010 data is available from a network of NO₂ diffusion tubes.

6.18.2 As a result of the decommissioning of the LBTH and LBH network and because of the elevated concentrations previously monitored by LBTH and LBH. URS has undertaken a NO₂ diffusion tube study for the Proposed Development. URS deployed a small number of NO₂ diffusion tubes at five locations around the Proposed Development site to augment LBTH and LBH data. The diffusion tubes were deployed for a period of three months (between August and October 2013) with tubes changed on a monthly basis.

Potential Impacts of the Proposed Development

6.18.3 The potential impacts of the development to be considered are:

- Impacts of dust during the demolition and construction phase of the development.
- Impacts of vehicle and plant emissions during the demolition and construction phases of the development on air quality including both on-site plant and vehicles and vehicles accessing the site by the public highway.
- Impacts of road traffic emissions from traffic generated by the Proposed Development once complete and operational.
- Impacts of emissions from onsite heat and power plant associated with the complete and operational Proposed Development.

Outline Scope of the Assessment

6.18.4 A desk based study will be undertaken in order to determine the baseline conditions and potential impacts of the Proposed Development in terms of local air quality considerations. The assessment will include:

- The identification of baseline air quality conditions and nearby sensitive receptors;
- Consideration of any demolition and construction phase impacts on dust impacts;
- Modelling of road traffic emissions (NO₂, PM₁₀ and fine particulate matter (PM_{2.5})) using the ADMS Roads model; and
- Modelling of the proposed heating plant related emissions using the ADMS 5 model.

6.18.5 The potential impacts and nuisance from demolition and construction dust emissions generated during the demolition and construction phase of the Proposed Development will be considered in the context of the Institute of Air Quality Management Construction Dust Assessment (i.e. basic screening assessment and risk based approach).

6.18.6 Demolition and construction plant emissions will not be explicitly modelled, as these are considered to be a small emission source relative to ambient conditions. However, suitable mitigation measures for site plant will be presented in the working method statement, also based on advice presented in the GLA code of construction practice.

- 6.18.7 The demolition and construction impacts on road traffic will also be considered, including the effect of HGV. The assessment will take into consideration the demolition and construction phasing of the Proposed Development in order to ensure that the assessment is robust. If significant numbers of additional vehicles are anticipated these temporary impacts would be modelled using ADMS-Roads.
- 6.18.8 Dust impacts during the construction stage will be assessed by providing a qualitative assessment of the potential sources and effects, together with a risk assessment to identify those receptors most at risk following the Institute of Air Quality Management (IAQM) Guidance for assessing impacts from construction activities.
- 6.18.9 Construction activities in air quality are typically considered from a risk perspective using the IAQM guidance as well as the GLA's best practice guidance. It is not common practice to quantify construction emissions due to the inherent issues modelling this kind of operation. The site will be considered 'high risk' (due to its scale and proximity to receptors) regardless of the onsite receptors and therefore an appropriate level of mitigation will be recommended to minimise pollutant emissions from site (including both plant and fugitive dust emissions). This mitigation will be incorporated, from best practice guidance, into any Environmental Management Plan which in turn will be agreed with the LPA before any work can commence on site. With this in mind there will be no change in risk to 'onsite receptors' than from existing 'offsite receptors' and as such the level of mitigation should satisfy both situations.
- 6.18.10 It may be required to model or screen different 'timeslices' for construction traffic should there be various peak construction traffic that would result in distinct modelling scenarios (i.e. two different volumes of traffic lasting for 6 months or more). This can be assessed during the normal modelling process using ADMS-Roads or a DMRB screening model and results presented within the chapter. Typically thought a worst case scenario is presented for construction traffic assessment typically presenting the highest year of construction volumes.
- 6.18.11 Mitigation of dust impacts will largely rely on the establishment of a Working Method Statement incorporating management measures to minimise emissions at source and to protect sensitive receptors. The working method statement will also incorporate advice presented in the LBTH 'Code of Construction Practice' (2006) and the GLA's guidance on 'The Control of Dust and Emissions from Construction and Demolition' (2006). As construction plant emissions will not be explicitly modelled, suitable mitigation measures for site plant will be presented in the working method statement, also based on advice presented in the GLA code of construction practice.
- 6.18.12 Impacts from road traffic will be assessed using the detailed ADMS Roads air dispersion model. The model will be used to assess existing baseline air quality to allow for validation of the modelling outputs and to predict future air quality to assess both the impacts on local air quality and the potential for future occupants to be exposed to elevated pollution levels. In the event that concentrations at ground floor level are predicted in excess of the air quality objectives, concentrations will be predicted at various heights within the development, to inform the mitigation strategy.
- 6.18.13 The road traffic scenarios that will be considered as part the assessment will include:
- Baseline scenario;
 - Without Construction scenario (if different to baseline);
 - With Construction scenario;
 - Opening Year – without development scenario (if different to baseline);
 - Opening Year – with development scenario; and
 - Opening Year – with development and cumulative schemes scenario.

- 6.18.14 ADMS-Roads will be used to model the potential impacts for a construction scenario, if significant changes in traffic are anticipated along the local road network. The predicted pollutant concentrations from the ADMS Roads modelling will be compared with relevant air quality objectives.
- 6.18.15 Emissions from the proposed energy centres will be quantitatively assessed using the ADMS-5 atmospheric dispersion model. The assessment will also take into account the potential effect of the energy centre emissions above height.
- 6.18.16 The model output from the ADMS 5 model will be compared with relevant air quality objectives. The pollutants modelled will depend on the combustion source of any heating plant. For example, only NO₂ concentrations will be modelled if the fuel for any heating plant is natural gas. Particulates would be modelled for a liquid or solid fuel source.
- 6.18.17 Air quality modelling for road (ADMS-Roads) and point sources (ADMS 5) will utilise the same year of meteorological data and key parameters such as surface roughness. One year of hourly sequential meteorological data will be utilised.
- 6.18.18 The year of meteorological data utilised will depend on the years of monitoring data and traffic data available for consideration in the air quality assessment, with the aim of aligning as many input parameters as possible to limit the numbers of parameters which could adversely affect model performance. Qualitative reference would be made to any potential variations in impacts that could be expected from differing years of meteorological data.
- 6.18.19 Where appropriate the contributions of heating plant emissions and road traffic emissions will be combined (e.g. annual average contributions at key roadside receptors) with background pollutant concentrations. This will allow combined air quality impacts associated with the Proposed Development to be considered.
- 6.18.20 The overall significance of air quality impacts will be described using the approach outlined in Environmental Protection UK and IAQM guidance. Reference will also be made to relevant planning policy in determining the significance of air quality impacts (e.g. LBTH and LBH Air Quality Action Plans).
- 6.18.21 Where necessary, mitigation and monitoring measures will be recommended to reduce air quality impacts and to avoid the potential exposure of future occupants of the Proposed Development to elevated pollution concentrations.
- 6.18.22 The same methodology will be used for the detailed and outline elements of the scheme.

6.19 Noise and Vibration

Baseline Conditions

- 6.19.1 The current primary noise and potential vibration sources affecting and surrounding the site consist of traffic on the surrounding road network and overground trains on the East London Line. Mechanical service plant on nearby buildings may also influence noise levels at the site.
- 6.19.2 There are a number of receptors which are sensitive to noise and vibration and are located in close proximity to the site (see Figure 13). Noise and vibration is therefore a key planning consideration.
- 6.19.3 A full baseline noise survey will be undertaken in line with BS7445. A combination of long-term and short-term noise measurements will be carried out at locations around and within the Site in order to:
- Characterise and determine the typical daytime and night-time noise levels representative of those at the existing noise sensitive receptors for subsequent use in setting appropriate noise emissions criteria; and
 - Establish ambient and maximum noise levels around the Site in order to construct a detailed noise map of the Site. Information on how the market operates will be used to produce meaningful noise maps of the existing and future scenarios.

Potential Impacts of the Development

6.19.4 The current primary noise and potential vibration sources impacting the site and surrounding area broadly consist of the following:

- Traffic noise from vehicles passing along local roads; and
- Noise (and vibration) associated with ground borne noise from trains passing along the railway viaduct.

6.19.5 Potential noise effects may occur at existing and proposed residential receptors due to the Proposed Development as a result of:

- Construction and demolition activities;
- Changes in road traffic flows; and
- Fixed plant associated with the Proposed Development.

Scope of the Assessment

6.19.6 The assessment will follow LBTH Unitary Development Plan (UDP) Planning Standards. Noise and vibration mitigation measures for internal spaces will be based on guidance noise levels within BS8233, and vibration levels given in BS6472.

6.19.7 A construction noise and vibration assessment will be undertaken based on construction activity, plant use and traffic movement information. Noise levels at receptors will be calculated using BS5228 data and procedures. Vibration risks will be assessed based on the types of plant used and their proximity to receptors, using guidance in BS5228 and BS7385. From the results of the construction noise and vibration assessment, preliminary mitigation measures will be advised in line with BS5228 and the LBTH’s ‘Code of Construction Practice.

6.19.8 Construction noise levels will be predicted by taking a number of timeslices during the 10 year construction program which will be representative of either periods of high construction noise due to simultaneous activities in neighbouring plots or when specific groups of receptors are exposed to high levels of noise due to their proximity to plots.

6.19.9 The timeslices will allow the assessment of worst case construction noise at existing sensitive receptors, and at new sensitive receptors that will be completed prior to construction taking place in adjacent plots. As construction noise levels predicted in the assessment are considered as worst case. Consequently, any risk of exceedances of construction noise limits can be identified and noise mitigating practices can be recommended where necessary.

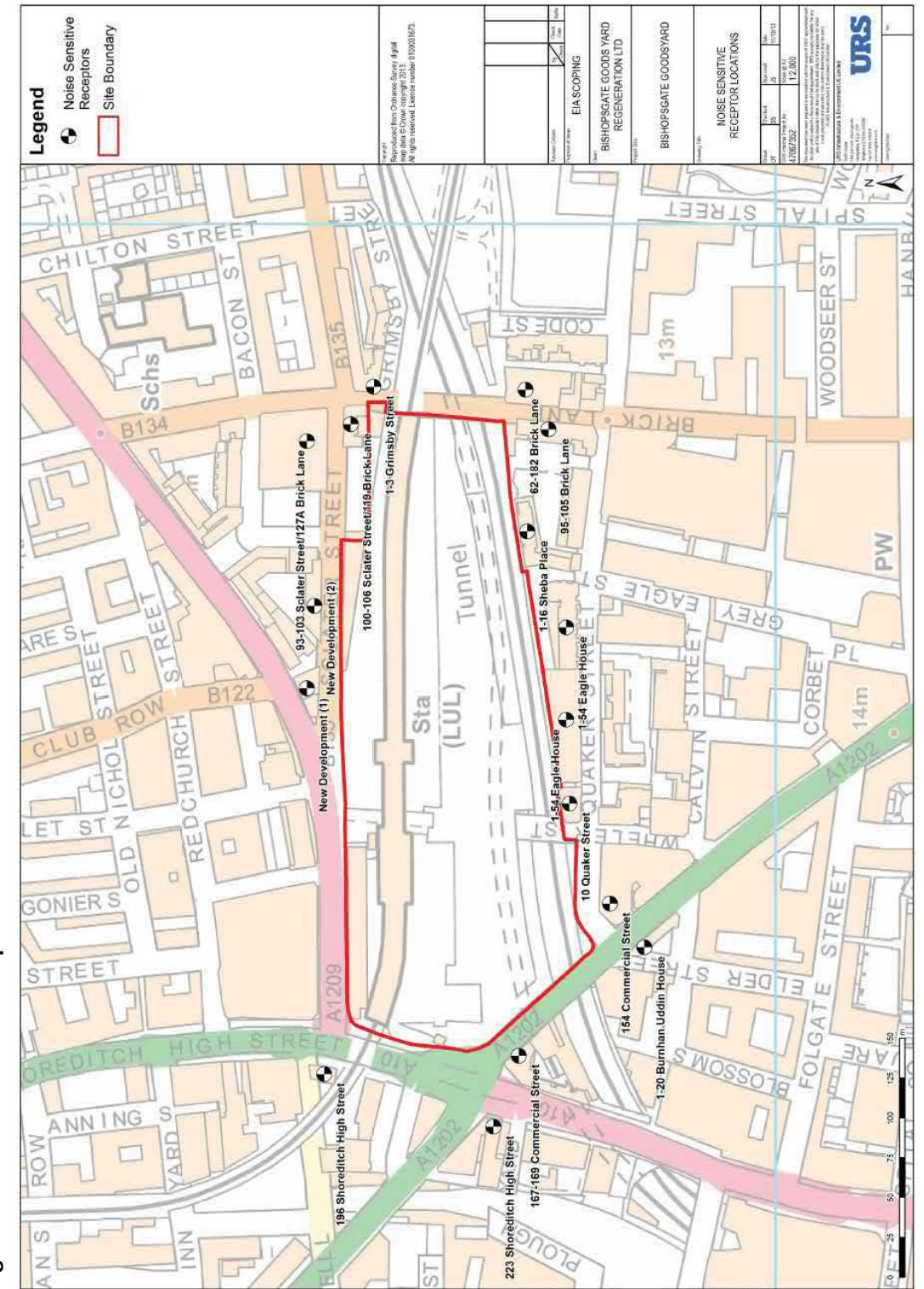
6.19.10 Building services noise associated with the operation of the completed development will be assessed with BS4142 and limits recommended such that the noise due to building services is 10 dBA below the minimum L90 background noise.

6.19.11 Noise levels associated with construction traffic and future operational traffic flows will be assessed in line with Calculation of Road Traffic Noise (CRTN) issued by the Department of Transport in 1988, and mitigation measures will be detailed as necessary.

6.19.12 Cumulative effects of combined construction works and operational traffic from nearby consented schemes will be assessed.

6.19.13 The ES chapter will be supported by a technical appendix which will contain useful reference material and tabulated noise survey results.

Figure 13: Noise Sensitive Receptor Locations



6.20 Water Resources, Drainage and Flood Risk

Baseline Conditions

- 6.20.1 No surface waterbodies are present on the Site and the nearest major surface water body is the River Thames, approximately 1.7 km south of the Site and Regents Canal, approximately 1.5 km north east of the site. The River Thames is tidal in this location.
- 6.20.2 Although the development site is not directly linked to the River Thames through surface water connections, there is an indirect pathway to the River Thames via the TWUL sewer network, which discharges into the River Thames via combined sewer overflows (CSOs). The River Thames is therefore taken forward as part of this assessment as it is a receptor for spills from CSOs.
- 6.20.3 The tidal stretch of the River Thames is divided into three water bodies for the purpose of the Water Framework Directive, with the Site being located closest to the Middle Thames water body, which is classified as heavily modified due to its role in coastal and flood protection and navigation purposes.
- 6.20.4 The Middle Thames water body is currently considered to be of Moderate Ecological Potential and failing to meet Good Chemical Potential. The tidal section of the River Thames on a whole is not expected to meet Good Ecological Potential by 2015 as this would be disproportionately expensive and technically unfeasible.
- 6.20.5 The site is approximately 100m east of the former course of the River Walbrook (a tributary of the Thames). At present the River Walbrook is contained within a culvert beneath Curtain Road, to the east of Shoreditch High Street.
- 6.20.6 The Site is located within Flood Zone 1 and is therefore at low risk of flooding from fluvial and tidal sources, with an annual exceedence probability (AEP) of <0.1% (1 in 1000) from fluvial or tidal flooding in any year.
- 6.20.7 Based on a review of the LBTH Strategic Flood Risk Assessment (SFRA) the site is at low risk from both tidal, fluvial flooding and groundwater flooding. However the site is at risk of surface water flooding.
- 6.20.8 The area of the site is directly underlain by the Taplow Gravel, part of the River Terrace Deposits minor aquifer. The soils overlying the River Terrace Deposits are classed by the Environment Agency as being of high leaching potential and as such the groundwater in the River Terrace Deposits is classified as highly vulnerable.
- 6.20.9 The London Clay is classified by the EA as a non-aquifer. The Chalk and Thanet Sand Formations, and occasionally, the lower part of the Lambeth Group which overlies the Thanet Sand Formation are in hydraulic continuity and therefore are normally considered together as the Chalk/Basal Sands aquifer. The Chalk is classified as a major aquifer by the EA whereas the Thanet Sand Formation and Lambeth Group strata are classified as minor aquifers.
- 6.20.10 The site does not lie in a Groundwater Source Protection Zone (SPZ).

Potential Impacts of the Development

Demolition / Construction

- 6.20.11 The following pollution sources arising from demolition / construction works that have the potential to affect water resource receptors have been identified and will be considered in the ES:
- creation of preferential pathways and disturbance to groundwater;
 - disturbance of existing drainage systems and water supply networks;
 - disturbance of contaminated land;
 - leaks and spillages of oils/hydrocarbons, etc;

- release/ mobilisation of suspended sediments; and
 - concrete and cement products.
- 6.20.12 Other activities associated with the demolition / construction phase comprise:
- flood risk (groundwater and surface water);
 - additional water demand; and
 - additional wastewater generation.
- Operation*
- 6.20.13 The following pollution sources arising from the operational phase of the development that have the potential to effect water resource receptors have been identified and will be considered in the ES:
- leaks and spillages of oils/hydrocarbons, etc;
 - application of fertilisers and pesticides within landscaped areas; and
 - contamination from in-situ materials.
- 6.20.14 Other activities associated with the operation phase comprise:
- flood risk (groundwater and surface water);
 - additional water demand; and
 - additional wastewater generation.
- Scope of the Assessment
- 6.20.15 As the site is over 1ha in size a Flood Risk Assessment (FRA) is required to accompany the hybrid planning application, as per the requirements of National Planning Policy Framework (NPPF).
- 6.20.16 URS will undertake the FRA in accordance with NPPF. The EA, LBTH and Thames Water Utilities Limited will be consulted as part of the assessment.
- 6.20.17 The scope of the FRA will include:
- Review of relevant planning policy and available Strategic Flood Risk Assessments;
 - Collection and review of contemporary and historical flood risk information;
 - Identification of sources and probability of flood risk both pre- and post-development;
 - Calculations for surface water run-off, both pre- and post-development;
 - Recommendations for flood mitigation/management measures, including management of surface water; and
 - Identification of any off-site effects and residual risks.
- 6.20.18 In addition to the FRA, a water resources chapter will be prepared inclusive of the following sections:
- Legislative and planning policy context;
 - Explanation of assessment methodology and significance criteria;

- Analysis of baseline conditions – geology, geomorphology and hydrology, hydrogeology and groundwater, surface water resources, aquifers, abstractions, source protection zones, water quality, water services;
 - Assessment of potential effects and mitigation measures (during demolition/construction and operational phases);
 - Summary of FRA issues; and
 - Assessment of residual and cumulative effects.
- 6.20.19 The EIA chapter will also include an assessment of the potential water demand and wastewater generation of the Proposed Development. Remedial measures for additional water demand such as the potential for the inclusion of water efficient fixtures and fittings will be proposed within the EIA.
- 6.20.20 Significance criteria for the assessment of impacts on water resources and flood risk is proposed to be based on the methodology given in the Department for Transport's document 'The Water Environment Sub-Objective' Transport Analysis Guidance (TAG) UNIT 3.3.11¹, which brings together the 'New Approach to Transport Appraisal (NATA)' document² and the 'Guidance on the Methodology for Multi-Modal Studies (GOMMMS)' document³. Whilst this guidance was produced to facilitate the comparison of transport schemes, the definitions provided take into account the sensitivity and vulnerability of the water resource and are therefore applicable to the activities associated with the Proposed Development.
- 6.20.21 Mustow, Burgess and Walker expanded the GOMMMS methodology in their 'Practical Methodology for Determining the Significance of Impacts on the Water Environment' publication in 2005⁴ to make the application of the method more standardised and less open to the subjective-ness of the assessor, and it is this specific method will be used in this assessment.
- 6.20.22 In accordance with the stages of the methodology, as described in paragraph 11.45, there are three stages to the assessment of the impact on water resources as follows:
- A level of importance (low to very high) is assigned to the water resource receptor based on a number of attributes such as water supply, biodiversity, transport and dilution of waste products, recreation, and conveyance (Table 11-1);
 - The magnitude of the potential and residual impact (classed as high, medium, low or negligible) is determined based on Table 11-2 and the assessor's knowledge of the Proposed Development. Specifically for the assessment of residual impacts, mitigation measures are taken into account in determining the magnitude of change; and
 - Comparison of the importance of the resource and magnitude of the impact (for both potential and residual) results in an assessment of the overall significance of the potential impact on the water resource receptor (Table 11-3). Each identified impact (both potential and residual) will be classed as Major, Moderate, Minor or Negligible, Beneficial or Adverse significance.
- 6.20.23 Where other receptors and attributes are identified, professional judgement and available information will be used to determine their importance.
- 6.20.24 The following significance categories will be used for both potential and residual impacts:
- Negligible: An imperceptible impact or no impact to a water resources receptor;

¹ Department of Transport (2003); 'Transport Analysis Guidance' (TAG) UNIT 3.3.11'.

² Department of the Environment Transport and the Regions (DETR), (1998); 'New Approach to Transport Appraisal'

³ DETR (2000); 'Guidance for the Methodology of Multi-Modal Studies Volume 2'.

⁴ Mustow, S.E, Burgess, P.F. and Walker, N., (2005); 'Practical Methodology for Determining the Significance of Impacts on the Water Environment. Journal of the Chartered Institution of Water and Environmental Management, 19 (2)'.

- Beneficial: A beneficial/positive impact on the quality of a water resource receptor; or
 - Adverse: A detrimental/negative impact on the quality of a water resources receptor.
- 6.20.25 An impact can be temporary or permanent, with impacts quantified temporally as being short-term (0-5 years), medium term (6-10 years) or long-term (>10 years).
- 6.20.26 When an impact is considered to be beneficial or adverse, the following levels of significance will be stated, as shown in Table 14-3:
- Minor: An example is a limited, very short or highly localised impact (i.e. low magnitude of change) on a water resource of high or medium quality (or importance); or a wide extent or long duration (i.e. a high magnitude) impact on a water resource of low quality/importance;
 - Moderate: Medium magnitude of change on a water resource of high quality; or a large (reversible) impact on a water resource of medium quality/importance; and
 - Major: A magnitude of change on a water resource of high quality/importance.

6.21 Archaeology

Baseline Conditions

- 6.21.1 Part of the site lies within the Hackney South Shoreditch Archaeological Priority Area, and abuts the Fournier Street, Elder Street and Shoreditch High Street Conservation Areas. There are no scheduled monuments on the site.
- 6.21.2 In 2011, Museum of London Archaeology (MOLA) carried out a programme of archaeological and built heritage mitigation for the recently completed East London Line development. As a result of its location and historic development, the site has a low potential to contain archaeological remains of the prehistoric and early medieval periods. Prehistoric objects have been found during excavation of later features, but there was no evidence of their original context. No archaeological remains dated to the early medieval period have been found on site, and it seems probable that the site was in open fields during this period.
- 6.21.3 The investigations on the site demonstrate that the site has a high potential to contain archaeological remains of the Roman, later medieval and post-medieval periods. Evidence of all these periods has been recovered from the site, although material from the later medieval and post-medieval period is more prevalent and extensive than earlier remains. Some evidence of later medieval agricultural uses, including drainage works, and post-medieval brickmaking has been located. Extensive evidence of successive phases of post-medieval urbanisation has been recovered including well-preserved buildings, yards, roadways and associated pits and industrial features, with some elements being identifiable on early maps.
- 6.21.4 There is also the potential for significant early railway archaeology, including both listed and unlisted structures which survive below ground. They include well preserved remains of one of the World's first operational passenger railways – the Eastern Counties Railway of c 1840, and subsequent developments including the 1890s structures of the Bishopsgate Goods Yard, the major depot for produce supplying the London markets.

Potential Impacts of the Development

- 6.21.5 Construction effects could arise from activities which remove, disturb or alter buried heritage assets, or their physical context/setting. This might include preliminary ground works, site set up, demolition and obstruction removal, landscaping, ground excavation for basements, foundations and ground remediation.

6.21.6 Additional ground disturbance during the operational (completed development) phase is not anticipated, and operational effects are therefore unlikely for the historic environment topic, under the scope outlined below. Operational effects resulting from changes in the visual character or setting of above ground heritage assets, due to the presence of permanent, visible structures or modifications to existing structures, would be covered by the Townscape/Visual topic.

Scope of the assessment

6.21.7 MOLA will provide the technical input to the EIA in terms of the historic environment. This comprises buried heritage assets, palaeoenvironmental deposits, and landscapes of heritage interest, including the physical context of heritage assets (buried remains which contribute to the understanding, appreciation and significance of a heritage asset). The visual setting and historic character of above ground heritage assets, for example the setting of individual listed buildings and conservation areas, and the way in which they are experienced, would be covered by the Townscape/Visual topic.

6.21.8 The specialist assessment would conform entirely to standards set by the Institute for Archaeologists and other professional guidance, along with local planning authority scoping guidance. It would:

- Quantify predicted buried heritage assets that may be affected by the proposed scheme;
- Assess any previous impacts which may have affected asset survival;
- Provide an evaluation of asset significance based on statutory designation, or in the absence of designation, professional judgement against values set out in English Heritage Conservation Principles (English Heritage 2008);
- Assess development impacts and hence the significance of environmental effects arising from the proposals during the construction phase and operation/completed phase, including effects on the historic character and setting of buried heritage assets where relevant;
- Provide recommendations for mitigation that would offset or eliminate any adverse effects;
- Quantify any residual effects (those that might remain after mitigation) and cumulative and secondary effects. This would also consider residual effects on climate and climatic factors, where relevant to the historic environment topic.

6.21.9 The ES chapter for the historic environment would be supported by a fully illustrated technical appendix. This would include a detailed baseline compiled through a broad and standard range of data sources, including the Greater London Historic Environment Record, the English Heritage National Heritage List and National Record for the Historic Environment, the London Archaeological Archive and Resource Centre, and local authority data sources along with published works and cartographic sources, and geotechnical and geoarchaeological data. The study would also include site walkover inspection.

6.21.10 In 2007, the MOLA Assessment Team carried out an EIA of the site (Bishopsgate Goods Yard: Associated Development Scheme). This incorporated the results of an archaeological evaluation by MOLA in 2006 for the East London Line development. The results of the latter was subsequently used to inform an archaeological mitigation strategy of targeted excavation and built heritage recording, which was carried out by MOLA in 2011 and the results subsequently published in a MOLA monograph (Dwyer E, 2011 The impact of the railways in the East End 1835–2010). The EIA for the current scheme would consult and update these earlier studies.

6.21.11 The baseline would put the Proposed Development into its full archaeological and historical context within and beyond the site, which may be affected by the proposed scheme. It would include an assessment of factors which may have compromised asset survival.

6.22 Built Heritage

Baseline Conditions

6.22.1 An assessment will be made of the existing listed structures/buildings on the site in order to determine the level of significance of each of the structures in their current form. This work will be informed by historic research into the development of the site in its context and by an appraisal of the existing structures.

6.22.2 The work will also include an assessment of unlisted but historic structures within the site including elements of the boundary wall that form part of the Fournier Street Conservation Area. The assessment will also include the unlisted former chapel and weavers' houses on the south side of Sclater Street abutting the Goodsyards boundary.

6.22.3 The work will also identify heritage receptors outside of the site (up to 500m). While the zone of visual impact of the proposed scheme is yet to be defined, the current significance, value, character and appearance of nearby designated and non-designated heritage assets will be considered as part of the analysis of existing baseline conditions.

Potential Impacts of the Proposed Development

6.22.4 The significance of designated and non-designated heritage assets within the site has the potential to be affected by aspects of the Proposed Development. These include the grade II listed Former Forecourt Wall and Gates to the Old Bishopsgate Goods Station and the grade II listed Braithwaite Viaduct. Similarly, listed buildings outside the site also have the potential to be affected and these will be identified in due course. Given the proposed form of development, the scheme is likely to be visible from a large area and while that area is yet to be determined it is likely that a number of heritage assets could be affected by the proposals.

6.22.5 There are a number of conservation areas in the close proximity to the site and further afield that include the Elder Street, Fournier Street, Redchurch Street, Boundary Estate, Hackney Road, Artillery Passage, Wentworth Street and Jesus Hospital Estate Conservation Areas in the LBTH; South Shoreditch, Sun Street, Hackney Road, Hoxton Street and Kingsland Conservation Areas in the LBH; Finsbury Circus, New Broad Street, Bishopsgate, St Helen's Place and Bank Conservation Areas in the City of London; and Moorfields and Bunhill Field and Finsbury Square Conservation Areas in the London Borough of Islington.

6.22.6 The impact of the proposed scheme on surrounding conservation areas will also be assessed. This will be done by assessing and identifying the character and appearance of each conservation area affected through a visual assessment of the relevant conservation area and consideration of conservation area appraisals and management guidelines. This will highlight the significance of the designated heritage asset which will be determined as a result of this process.

6.22.7 While most of the development site is outside the boundary of nearby conservation areas, with the exception of the Sclater Street properties, the proposed scheme is likely to appear in views across conservation areas and into and out of the designated areas. Understanding the juxtaposition of the existing conservation areas and the site and the relationship between established conservation areas and the proposed scheme will be demonstrated as part of the EIA process. The effect of the proposed scheme on the character and appearance of the conservation areas listed will be identified.

6.22.8 The effect of the Proposed Development on the Tower of London World Heritage Site will also be considered, as will any effects or otherwise on protected views of St Paul's Cathedral.

6.22.9 It is proposed to work in consultation with the LBH, LBTH and English Heritage (and any other relevant stakeholders) in identifying any additional potential designated and non-designated heritage assets that may be affected by the proposed scheme. The full list of relevant heritage assets will be compiled in due course once the geographical scope of the scheme's potential impacts has been identified.

Scope of the Assessment

- 6.22.10 Assessment of the effect of any proposed development on a heritage receptor is made on the basis of professional judgement which takes into account relevant planning policies and guidance. It is based on the following method.
- 6.22.11 The sensitivity of the heritage receptor as existing will be assessed as high, medium or low, depending on the importance, value and quality of the receptor and its setting. The assessment takes into account the setting of relevant listed buildings, important locally listed buildings and on relevant conservation areas. The assessment of the sensitivity of the receptor under consideration is moderated to take into account a judgement about its quality in the round.
- 6.22.12 The magnitude of the change resulting from the Proposed Development will be assessed as major, moderate, minor or negligible according to the change to the heritage asset's setting and value. These two measures are combined to provide a measure of the significance – major, moderate or minor - of the effect on the heritage receptor which will result from the Proposed Development, the most significant effects being effects of major magnitude on receptors of high sensitivity.
- 6.22.13 Effects are assessed as beneficial, adverse, or neutral. The assessment as beneficial or adverse is a 'net equation', since with regard to the heritage receptor that is being assessed there may be both positive and negative effects as a result of the development.

6.23 EcologyBaseline Context - Preliminary Ecological Appraisal

- 6.23.1 A preliminary ecological appraisal survey of the site was undertaken on 22nd May 2013 in accordance with the Joint Nature Conservation Committee (JNCC) Phase 1 Survey Guidelines. The survey classified and mapped the habitats present on the site and recorded the dominant plant species within each of the habitat types. Additionally, the potential for the survey area to support any legally protected flora and/or fauna of nature conservation importance, e.g. Biodiversity Action Plan (BAP) priority species, was assessed.
- 6.23.2 The survey identified a large brownfield site consisting of hardstanding, bare ground and scrub encroachment above a network of disused railway arches located within a tunnel to the south of the site. The majority of the site consisted of bare ground and hardstanding habitats located to the north of the site. A strip of scrub is located from eastern boundary to western boundary across the site and was dominated by buddleia *Buddleja davidii* and bramble *Rubus fruticosus* agg with thistle *Cirsium vulgare* and teasel *Dipsacus fullonum* growing occasionally. The ground flora consisted mainly of common tall ruderal and grassland species.
- 6.23.3 Areas of rubbish, rock and debris associated with spoil embankments were noted throughout the site. A line of conifers were located growing along a wall within the centre of the site. No other large trees were recorded throughout the site.
- 6.23.4 Within the tunnel section of the site, 15 archways were noted consisting of red brick construction and supported by girders throughout. The arches and tunnel were open to the south of the site adjacent to a rail line running east-west. Parts of the tunnel roof and in particular within spaces adjacent to the steel girders are currently used by feral pigeon *Columba livia*.

Potential Impacts of the Development*Statutory and Non-statutory Designated Sites.*

- 6.23.5 Potential impacts on statutory protected sites (such as Special Areas of Conservation (SAC), Sites of Special Scientific Interest (SSSI) and Local Nature Reserves (LNR)) and non-statutory protected sites (such as Sites of Importance for Nature Conservation (SINC)) will be considered based.

- 6.23.6 These sites will be identified by information collected through the desk study process (described in further detail below). Several non-statutory designated sites lie within 2km and the adjacent railway line may provide a corridor for wildlife. The impact of the development on such areas will be considered.

Habitats

- 6.23.7 Impacts upon the brownfield habitat, which is currently listed under the London Biodiversity Action Plan (BAP) (Wasteland Habitat) and Tower Hamlets BAP (The Built Environment), may occur through habitat loss/ fragmentation and will be considered. Consideration will also be given to whether parts of the site meet the Joint Nature Conservation Committee (JNCC) definition for the UK priority habitat "Open Mosaic Habitats on Previously Developed Land.

Species

- 6.23.8 Impacts on legally protected species and other notable species (such as those in the UK, London and Tower Hamlets BAPs; Red Data Book invertebrates; and Birds of Conservation Concern will also be considered. Following the initial walkover of the site, it is thought to provide potential to support the species listed below:
- Bats (roosting and foraging);
 - Common Reptiles;
 - Breeding Birds (Black Redstart) and;
 - Invertebrates.

- 6.23.9 These species or species groups may be affected directly by the Proposed Development through loss of resting places, commuting or foraging habitat. Impacts may arise through site works and construction (noise, dust and pollution) and during operation through changes in lighting levels and increased disturbance.

Scope of the Assessment

- 6.23.10 The impact assessment section will consider the likely scale and significance of effects and review any required mitigation measures. Based on the walkover carried out in May the assessment will consider the following receptors and provide further contextual information upon which the Ecological Impact Assessment (EiA) will be based. An assessment of likely impacts and effects as a result of the Proposed Development will then be made. Additional focused surveys for Schedule 8 plants such as jersey cudweed *Gnaphalium luteoalbum* will also be carried out wherever suitable habitat is present.

Statutory/ Non statutory Sites and Habitats

- 6.23.11 Consultation will be undertaken with the local biological records centre Greenspace Information Service for Greater London (GiGL). Further consultation may be required with specialist groups such as the London Bat Group in order to obtain a full suite of data on the biodiversity found at and near the site in question. In addition, a number of on-line resources will be used to obtain data on protected species. This work is needed to collate information regarding designated wildlife sites and biological records that may exist for the survey site and surrounding lands within a 2km radius. The following organisations will be contacted:
- Greenspace Information for Greater London (GiGL); and,
 - Records from web based sources, including those held on the National Biodiversity Network (NBN) Gateway (www.nbn.org.uk), MAGIC website (www.magic.gov.uk) and Nature on the Map (www.natureonthemap.org.uk).
 - The information obtained will inform and supplement the field survey work.

6.23.12 The local BAPs and appropriate Ordnance Survey maps will also be reviewed in order to identify potential linkages to site and potential policy implications from the Proposed Development.

Reptiles

6.23.13 Common reptiles, which include common lizard, slow worm, grass snake and adder, may be present within the extents of the field survey area where spoil, embankments, tall ruderals and scrub habitat have been recorded. These habitats, present across the east to west of the site, are likely to be valuable habitat to these species. A presence/ likely absence survey for these species will be carried out based on best practice issued by Froglife and the Joint Nature Conservation Council (JNCC) and within suitable weather conditions.

Bats

6.23.14 There are a number of habitat features within the survey area that could be of importance to bat species. Roosting potential has been identified throughout the tunnel and archways located to the south and east of the site. The scrub habitat present may also provide potential foraging opportunities for bats within the area. The presence of a relatively large area of open habitat within a mainly urban context is likely to further increase the potential importance of the site for foraging bats. Bat activity surveys to map levels of bat activity around key habitats and remote detector and/or emergence/return surveys to confirm if bats are present on site, will be carried out.

Birds including Black Redstart

6.23.15 Nesting birds are likely to be found in the scrub habitats within the survey area. The large areas of disused archways and rubble associated with the bare ground and spoil embankments are suitable for black redstart. This species requires areas of sparse wasteland vegetation and stony ground for feeding with tall and complex structures offering ledges and crevices for nesting, which are present throughout the site. Surveys for breeding birds and in particular focusing on black redstart have been carried out using best practice guidance (Gilbert et al (1998) and on <http://www.blackredstarts.org.uk>). Five fortnightly surveys have been carried out between May and August using Passive observation where any black redstarts and other bird species seen visiting the area were recorded together with any activity that may indicate nesting i.e. carrying nesting material, carrying food, removing faecal sacs or exhibiting signs of anxiety (the latter including alarm calls). Additionally active observation was carried out which involved a slow walkover/search of the area conducting detailed inspections of the vegetation looking for evidence of active nests.

Invertebrates

6.23.16 The brownfield habitats on site and site context within a largely urbanised part of London is likely to provide potential for a number of insect species to be present. Priority species identified within Hackney Local Biodiversity Action Plan and Tower Hamlets Local Biodiversity Action Plan and associated with brownfield sites include the large ranunculus moth *Polymixi flavincincta*, swallow tail moth *Ourapteryx sambucar*, stag beetle *Lucanus cervus* and brown-banded carder bee *Bombus humilis*. Further assessment of the sites importance for invertebrates may be required depending on the information returned from the desk study.

6.23.17 Once the ecological baseline for the site has been fully described, any ecological receptors that are likely to be significantly impacted will be identified. These potential impacts will then be assessed using the Institute for Ecology and Environmental Management (IEEM) Ecological Impact Assessment Guidance (2006). Any adverse significant impacts will be mitigated or compensated for where necessary and ecological enhancements will also be recommended where viable. The whole assessment will be written up and described within the Ecology Chapter of the Environmental Statement.

6.24 TV and Radio (Electronic) Interference

Baseline Conditions

6.24.1 Terrestrial TV signals are transmitted in digital format (Freeview). The Crystal Palace transmitter provides this service in London. It is located about 11km to the south of the Proposed Development. Satellite TV signals are provided by both Sky and Freesat. Cable TV services are not at risk as they are not transmitted through the air. The Office of Communications (OfCom) database has identified several mobile telephone aerials in the vicinity of the Proposed Development.

Potential Impacts of the Development

6.24.2 The introduction of new structures of significant height and bulk into a residential environment can cause disruption to both terrestrial and satellite TV reception. The only relevant interference mechanism affecting TV signals is attenuation due to buildings physically blocking (and absorbing) the signals and, if they are too weak, the pictures very quickly deteriorate into random 'blocks' and then disappear altogether.

6.24.3 There is considered to be no significant risk to radio reception (both analogue and digital) as they use signals at lower frequencies that can bend to a greater extent around obstructions. Combined with an ability to make constructive use of reflected signals, radios are able to operate successfully in urban environments. Therefore, radio reception will not be considered in this assessment.

6.24.4 It is possible that communication networks such as those used by mobile telephone operators or emergency services could be adversely affected if their aerials are overshadowed by the Proposed Development.

Scope of the Assessment

6.24.5 Calculations based on the architectural drawings will indicate how far the terrestrial TV shadow will fall and what properties will be at risk of losing television reception. Principles of radiowave propagation from transmitting to receiving antennae (both terrestrial and satellite) are used to study the likely significant effect of the Proposed Development on TV reception in the area surrounding the Site. This is because these signals use frequencies that travel more or less in straight lines and hence can be blocked by the introduction of new buildings.

6.24.6 A site visit will identify and generate an estimate of numbers of properties potentially adversely affected. Existing radio, cable and satellite usage will be noted and assessed. Consideration will be given to any potentially adverse effects to existing mobile telephone systems, wireless networks, emergency services, DLR and maritime communications. Mitigating measures will be identified.

6.24.7 Consideration will be given to any potential cumulative effects caused by nearby consented projects.

6.25 ES Volume II – Townscape, Conservation and Visual Impact Assessment

Baseline Conditions

Townscape

6.25.1 An assessment will be made of the Site and surrounding townscape areas in their existing state. This will be based on study of the historic development of the area with reference to relevant publications, and study of the present-day condition of the area based on site visits, study of maps and aerial photographs, and relevant publications.

6.25.2 This analysis will inform the division of the study area into townscape areas i.e. geographical areas which have readily identifiable characteristics in common. The impact of the Proposed Development on these townscape areas will then be assessed, based on conclusions drawn from the views analysis.

Potential Impacts of the Development

Views

6.25.3

The study area for the visual assessment is centred on the Site and limited to locations from which the Site can be seen, or from which new buildings on the Site have the potential to result in a significant visual impact at the height proposed. A list and map of proposed views is provided in Table 4 and Figures 14 & 15 respectively which has been produced in consultation with LBTH, LBH English Heritage and the GLA.

Table 4: Proposed View Point Locations

View	View Point Location / Description
1	Alexandra Palace: the viewing terrace - south western section [LVMF 1A.1]
2	Parliament Hill: the summit - looking toward St Paul's Cathedral [LVMF 2A.1]
3	Kenwood: the viewing gazebo - in front of the orientation board [LVMF 3A.1]
4	Primrose Hill: the summit - looking toward the Palace of Westminster [LVMF 4A.1]
5	Greenwich Park: the General Wolfe statue - at the orientation board [LVMF 5A.1]
6	Blackheath Point - near the orientation board [LVMF 6A.1]
7	Westminster Pier: the orientation plaque [LVMF 8A.1]
8	King Henry VIII's Mound - the viewing point [LVMF 9A.1]
9	Tower Bridge: the North Bastion [LVMF 10A.1]
10	Tower Bridge: upstream - the south Bastion
10b	Tower Bridge: upstream - the south Bastion 2 nd view
11	Waterloo Bridge Downstream: close to the Westminster bank [LVMF 15B.1]
12	Waterloo Bridge: downstream - at the centre of the bridge [LVMF 15B.2]
13	Waterloo Bridge: the downstream pavement - crossing the Lambeth Bank
14	The South Bank: moving from National Theatre to Gabriel's Wharf- position 2
15	The South Bank: Gabriel's Wharf viewing platform - centre of north rail [LVMF 16B.1]
16	The South Bank: Gabriel's Wharf viewing platform - centre of north-east rail [LVMF 16B.2]
17	Golden Jubilee/Hungerford Footbridges: downstream - crossing the Westminster bank [LVMF 17B.1]
18	Golden Jubilee/Hungerford Footbridges: downstream - close to the Westminster bank [LVMF 17B.2]
19	City Hall: Queen's Walk [LVMF 25A.1]
20	The Queen's Walk at City Hall - in front of the public terraces [LVMF 25A.2]
21	The Queen's Walk at City Hall - close to Tower Bridge [LVMF 25A.3]
22	St James's Park Bridge - at the centre of the bridge [LVMF 26A.1]
23	Finsbury Square: South West corner
24	Paul Street: junction with Epworth Street
25	City Road: opposite Cayton Street
26	Great Eastern Street: traffic island at junction with Old Street
26w	Great Eastern Street: traffic island at junction with Old Street Winter
27	Great Eastern Street 2: junction with Curtain Road
28	Great Eastern Street 3: above the railway line
29	Southern end of Kingsland Road
30	Shoreditch High Street: junction with Rivington Street
31	Shoreditch High Street 2: junction with Bateman Row Night
32	Arnold Circus Roundabout: Boundary Gardens, southern steps Summer
32w	Arnold Circus Roundabout: Boundary Gardens, southern steps Winter
33w	Arnold Circus along Club Row Winter
34	Old Nichols Street / Chance Street
35	Shoreditch High Street, west side opposite Redchurch Street

View	View Point Location / Description
36	Bethnal Green Road: junction with Chilton Street- traffic island
36n	Bethnal Green Road: junction with Chilton Street- traffic island Night
37	Hereford Street: junction with Sale Street
38	Weavers Field
39	Cheshire Street / St Matthew's Row
40	Bethnal Green Road near to Club Row
41	From within open space at Weaver Street
42	Woodferry Street close to Deal Street
43	Commercial Street: junction with Hanbury Street
43n	Commercial Street: junction with Hanbury Street Night
44	Commercial Street close to Whites Row
45	Commercial Street by Whitechapel Road
46	Commercial Street close to Wheeler Street
47	Bishopsgate outside entrance to Liverpool Street Station
48	Old Spitalfields Market: Brushfield Street, opposite junction with Fort Street
49	Folgate Street on axis of Elder Street
49n	Folgate Street on axis of Elder Street / Night
50	Norton Folgate 1: junction with Primrose Street
51	Norton Folgate 2: opposite junction with Fleur de Lis Street Night
52	Brick Lane (east footway) at junction with Bethnal Green Road looking south
53	Hanbury Street looking north along Corbet Place / Grey Eagle Street
54	Brick Lane looking north from outside the Brickhouse entrance, just north of courtyard to no. 91 / Vibe bar
55	Kingsland Road - canal bridge
56	Geoffrey Museum
57	Hoxton Square
58	Rear of Shoreditch Church
59	Worship Street
60	Blossom Street
61	Quaker Street
62	Quaker Street Junction with Commercial Street

6.25.4 Viewpoints have been identified on the basis of the following method, and informed by previous experience of projects for tall buildings on the north-east fringe of the City of London.

6.25.5 Four principal types of viewing location have been identified:

- Views that have been identified as significant, by LBTH, LBH or others, e.g. in relevant planning policy and guidance documents (including the London Plan LVMF) and Conservation Area appraisals;
- Other locations or views of particular sensitivity, including those viewpoints in which the Proposed Development may significantly affect the settings of World Heritage Sites, Listed Buildings and Conservation Areas;
- Representative townscape locations from which the Proposed Development will be visible; and
- Locations where there is extensive open space between the viewer and the Proposed Development so that it will be prominent rather than obscured by foreground buildings.

- 6.25.6 The set of viewpoints have been chosen so that they cover:
- The range of points of the compass from which the Proposed Development will be visible;
 - A range of distances from the site; and
 - Different types of townscape area.
- 6.25.7 Possible locations in these categories within the study area are identified based on an examination of maps and aerial photographs; maps of Conservation Areas; maps and lists of Listed Buildings; and good prior knowledge of the area.

Figure 14: View Point Location Map

View Locations | Map

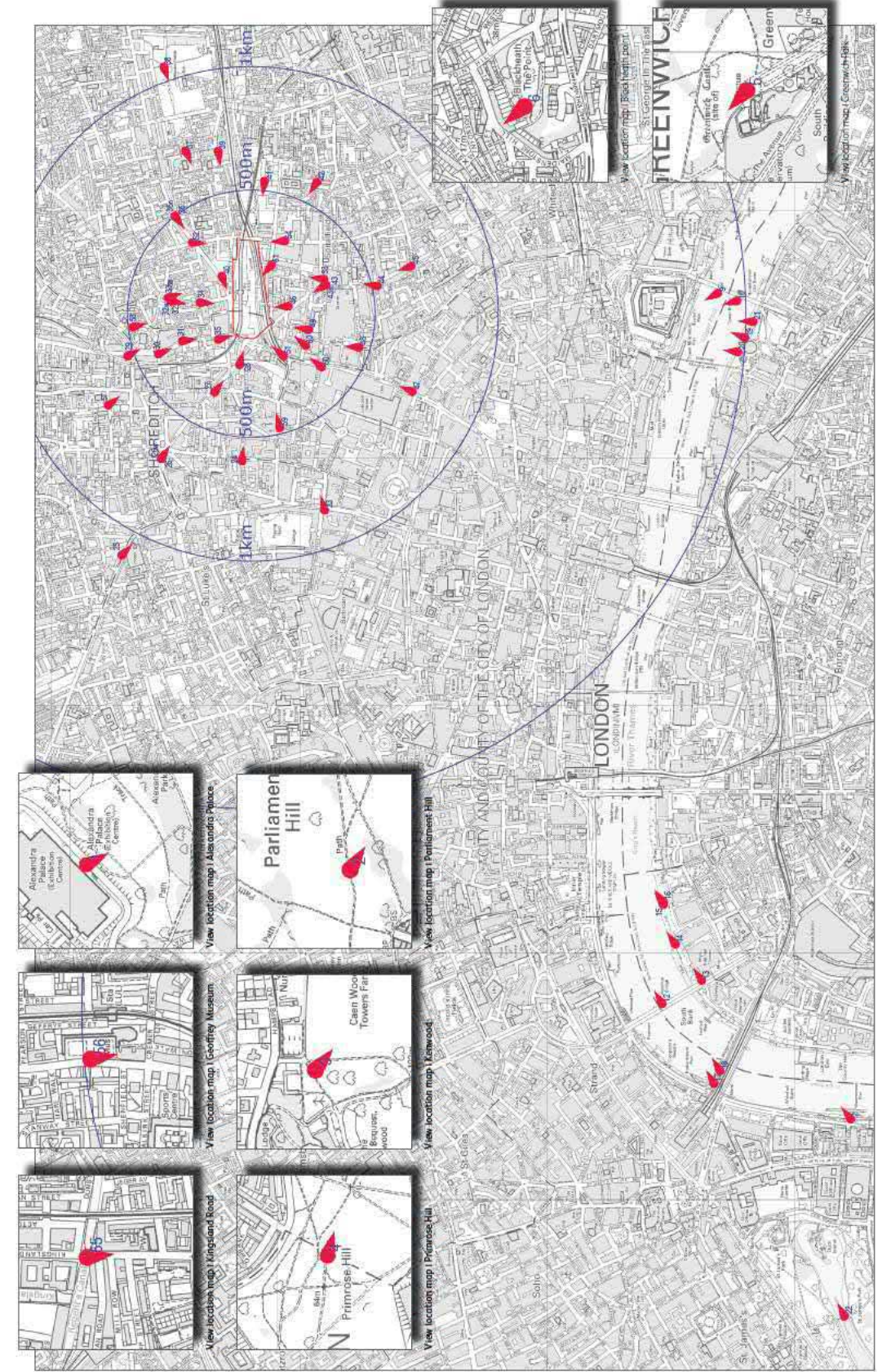
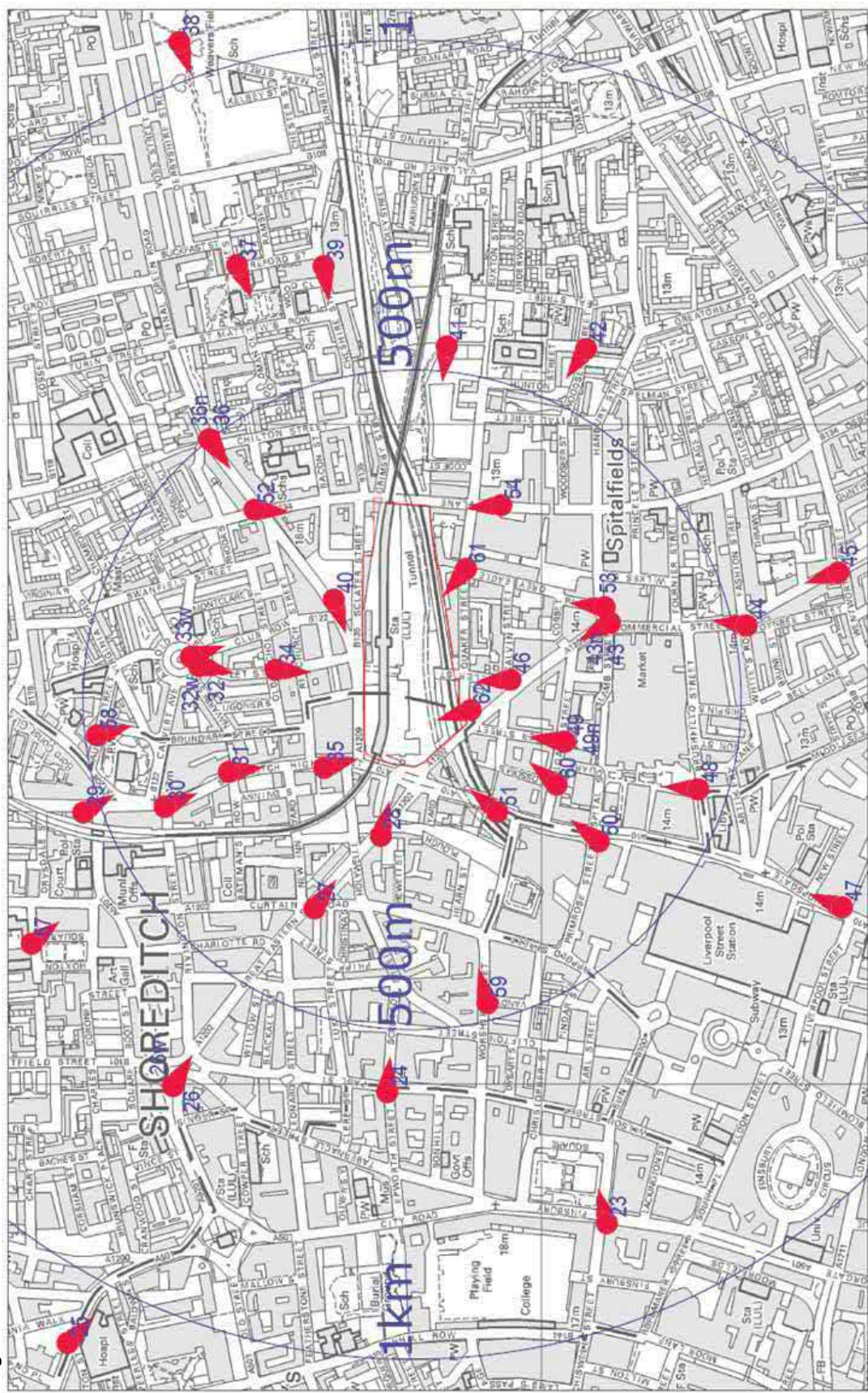


Figure 15: Local View Point Locations



Outline Scope of the Assessment

- 6.25.8 The methodology for the townscape and visual impact assessment is based broadly on the principles set out in the third (2013) edition of 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA), produced by the Landscape Institute with the Institute of Environmental Management and Assessment. However, these principles are better suited to assessing landscape than townscape, and so they can form only a general guide to the method to be used. Also relevant to the method of assessment is 'By Design' (DETR/CABE, 2000), which sets out the aspects of urban form and the objectives of urban design against which townscape can be assessed, and 'Design review' (CABE, 2006) which provides guidance on assessing architectural quality.
- 6.25.9 A brief overview of the methodology follows. A more detailed explanation will be provided as part of the townscape and visual impact assessment.

Townscape, views and built heritage asset – methodology for assessment
- 6.25.10 Assessment of the effect of any proposed development on a receptor (an area of townscape, a heritage asset or view) is made on the basis of professional judgement which takes into account relevant planning policies and guidance. It is based on the following method.
- 6.25.11 The sensitivity of the receptor as existing will be assessed as high, medium or low, depending on the importance, value and quality of the receptor, and nature and expectation of the viewer. The assessment takes into account the setting of any Grade I Listed Buildings, the setting of any Grade II* or Grade II Listed Buildings or conservation areas, and other areas, and the amenity value of the viewing location and area in which it is located. The assessment of the sensitivity of the receptor under consideration is moderated to take into account a judgement about its quality in the round.
- 6.25.12 The magnitude of the change resulting from the Proposed Development will be assessed as major, moderate, minor or negligible according to the change to the townscape, view or heritage asset's setting.
- 6.25.13 These two measures are combined to provide a measure of the significance – major, moderate or minor - of the effect on the receptor which will result from the Proposed Development, the most significant effects being effects of major magnitude on receptors of high sensitivity.
- 6.25.14 Effects are assessed as beneficial, adverse, or neutral. The assessment as beneficial or adverse is a 'net equation', since with regard to the receptor that is being assessed, there may be both positive and negative effects as a result of the development.
- 6.25.15 For each of the identified views in the assessment to be produced, there will be images of the view as existing and as proposed. Where appropriate, the view as proposed will be shown as a fully rendered image, showing the proposed new buildings and landscape treatment in a realistic manner. In other cases, the proposed buildings will be shown diagrammatically, in a 'wire line' outline. The consultation with LBTH and LBH to agree the list of views will include information on which of the views are proposed as render and which as wire line images.
- 6.25.16 Where other developments in the wider area which are proposed or have been granted consent would be visible to a significant extent in the view, a further image showing these schemes together with the Proposed Development will be produced.
- 6.25.17 For each of the identified views, a description of the view as existing will be given, identifying its visual quality, sensitivity to change and reason for that sensitivity. A description of the view as proposed will then be given with an assessment, based on the method set out above, of the significance of the effect that the Proposed Development will have on the view. A further assessment will consider cumulative effects if any for each view.

6.25.18 Viewpoints were chosen and townscape character areas defined taking into account heritage assets surrounding the Site. Heritage assets are identified as part of the baseline in both the view descriptions and townscape character area assessments and inform the sensitivity of each receptor (view or TCA) as set out in the methodology. Heritage assets will not be identified as individual receptors in the TVIA and the TVIA will not consider the effect of the Proposed Development on heritage significance.

6.25.19 The TVIA will assess the effect of the Proposed Development on LVMF views (which are not heritage assets) which will include consideration of the View Description and Visual Management Guidance as set out in the LVMF and the role of the identified heritage assets in the views. This will comment on the visual/townscape setting of heritage assets in these views where appropriate.

ENVIRONMENTAL TOPICS TO SCOPED OUT OF THE ES

6.25.20 The aim of the EIA Scoping Phase is to focus the EIA on those environmental aspects that may be significantly impacted by the Proposed Development. In so doing, the significance of impacts associated with each environmental aspect become more clearly defined, resulting in certain aspects being considered 'non-significant'. It is the intention to scope the following out of the ES:

6.26 Health and Wellbeing

6.26.1 The health and wellbeing of the local community is an important consideration for the Proposed Development, and it has the potential to result in a number of diverse effects. During the construction phase, impacts from dust, noise, traffic, and exposure to potentially contaminated land will be mitigated through measures stated in the relevant technical ES chapters. An assessment of construction employment and associated local spending will also be undertaken and described in the socio-economics chapter.

6.26.2 When the Proposed Development is complete it is also recognised that changes to amenity, such as open space, children's play space, daylight, sunlight and overshadowing and wind conditions can result in impacts to the health and wellbeing of local residents in particular. These will be considered within the relevant ES chapters. The ES will also describe where improvements have been made to the public realm, through landscaping and improved pedestrian access, and how car usage has been reduced to benefit the local community. Additional local spending and the proposed employment created by the Proposed Development will also be considered.

6.26.3 With respect to the future residents of the Proposed Development, the scheme will be fully accessible and comprise the appropriate level of facilities for people with disabilities. An internal daylighting assessment will be carried out, in addition to specific CfSH credits for "Health and Wellbeing" including hea1 "daylighting", hea2 "sound insulation", he3 "private space" and he4 "lifetime homes", which will be targeted in order to achieve Code Level 4.

6.26.4 As such it is not proposed that the ES will include a separate ES chapter addressing health and wellbeing.

6.27 Aviation

6.27.1 The Proposed Development is located within close proximity to arrival and departure flight paths from the major airports of London Heathrow and London City Airport.

6.27.2 The Civil Aviation Authority in their CAP 738 document (CDR45) requires that new development needs to maintain safe and efficient use of airspace over London.

6.27.3 Internal aviation require 1000 foot (304.8m) obstacle clearance to allow for clear flight paths and therefore any development in the central London area not exceeds 1000 feet (304.8m) in height.

6.27.4 The development proposals maximum height will be significantly below the 1000 ft zone within which the Civil Aviation Authority would support an objection to a planning application.

6.27.5 On the basis of the above, it is proposed that an aviation impact assessment is scoped out of the EIA, however the CAA and London City Airport will be consulted with in relation to the Development Proposals.

7 PROPOSED STRUCTURE OF THE ENVIRONMENTAL STATEMENT

7.1.1 The ES will comprise the following set of documents.

7.1.2 ES Non-Technical Summary (NTS): This document will provide a summary of the key issues and findings of the EIA. The NTS will be presented in non-technical language to assist the reader in understanding the site context, the Development Proposals, the design alternatives, the environmental issues arising and proposed mitigation measures.

7.1.3 ES Volume I: This will contain the full text of the EIA with the proposed Chapter headings as follows:

- Introduction;
- EIA Methodology;
- Alternatives and Design Evolution;
- The Proposed Development;
- Demolition and Construction;
- Waste and Recycling;
- Socio-economics;
- Ground Conditions;
- Traffic and Transport;
- Wind Microclimate;
- Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution;
- Air Quality;
- Noise and Vibration;
- Water Resources, Drainage and Flood Risk;
- Archaeology;
- Built Heritage;
- Ecology;
- TV and Radio (Electronic) Interference;
- Impact interactions and Cumulative Impact Assessment;
- Residual Impact Assessment and Conclusions; and
- Limited Development Scenario.

- 7.1.4 **ES Volume II: Townscape, Conservation and Visual Impact Assessment:** The ES will include a stand-alone Townscape, Conservation and Visual Assessment accompanied by a full set of views and verified images.
- 7.1.5 **ES Volume III: Technical Appendices:** This will provide supplementary details of the environmental studies conducted during the EIA including relevant data tables, figures and photographs.
- 7.1.6 In addition to the ES, the Planning Application is likely to include the following documents:
- Development Specification;
 - Layout Plans, Scale Plans, Land Use Plans, Access and Circulation Plans, Detailed Plans and Sections and Elevations;
 - Planning Statement;
 - Transport Assessment;
 - Design and Access Statement;
 - Townscape Assessment;
 - Retail Assessment;
 - Affordable Housing Statement;
 - Heritage Statement;
 - Regeneration Statement;
 - Site Wide Masterplan;
 - Design Code;
 - Sustainability and Energy Strategy;
 - Structural, Demolition and Construction Method Statement;
 - Illustrative Phasing Strategy;
 - Temporary Uses / Landscaping Strategy;
 - Statement of Community Involvement; and
 - Listed Building Consent Application including Design and Access Statement and Design Code.

8 SUMMARY AND CONCLUSIONS

- 8.1.1 This Report requests a Scoping Opinion of the LBTH and LBH pursuant to Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The EIA Scoping Report suggests a comprehensive scope of work based on previous experience of the assembled team of specialists and existing knowledge of the site. The LBTH, LBH and consultees are invited to consider the contents of this Report and comment accordingly within the five-week period prescribed by the EIA Regulations.



Julian Shirley
 DP9
 100 Pall Mall
 London
 SW1Y 5NQ

Development & Renewal

Planning and Building Control
 Town Hall
 Mulberry Place
 Clove Crescent
 London E14 2BG

www.towerhamlets.gov.uk

Enquiries to: Harriet Peacock
 Tel: 020 7364 3620
 E-mail: harriet.peacock@towerhamlets.gov.uk

Our ref: PA/14/107

19th March 2014

Dear Julian Shirley

**Environmental Impact Assessment Scoping Opinion
 The Town and Country Planning (Environmental Impact Assessment)
 Regulations 2011**

Proposal: Request for a Scoping Opinion in respect of information to be contained in an Environmental Impact Assessment to be submitted in support of an application for the proposed development at Bishopsgate Goods Yard

Site: Bishopsgate Goods Yard, Shoreditch High Street, London

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 2011 for the proposed development at Bishopsgate Goods Yard.

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 (Harriet Peacock) on telephone 020 7364 3620 or email harriet.peacock@towerhamlets.gov.uk.

Yours sincerely


 Owen Whalley
 Head of Planning and Building Control



Hackney Council
 Planning and Regulatory Services
 2 Hillman Street
 London E8 1FB
www.hackney.gov.uk
 Hackney Reference: 2014/0249

DP9
 100 Pall Mall
 London
 SW1Y 5NQ

25 March 2014

Town and Country Planning (Development Management Procedure) Order 2010


Application Number: 2014/0249
Site Address: Land at Bishopsgate Goods Yard, Bethnal Green Road, London, E1 6GY

Thank you for your recent planning application for the above address on which a decision has now been made.

Important Information about this Decision

- The decision on your Application is attached.
- Please carefully read all of the information contained in these documents.
- Please quote your application reference number in any correspondence with the Council, either by post to the Hackney Planning Service, 2 Hillman Street, London, E8 1FB, by email to planning@hackney.gov.uk, or by phone to 020 8356 8062.

Yours faithfully



John Allen
 Assistant Director (Planning and Regulatory Services)
 Legal, Human Resources and Regulatory Services

PLANNING DECISION NOTICE

Town and Country Planning Act 1990 as amended
Town and Country Planning (Development Management Procedure) (England)
Order 2010
Town and Country Planning (Environmental Impact Assessment) (England and
Wales) Regulations 1999

Agent: DP9
100 Pall Mall
London
SW1Y 5NQ
Applicant: C/O Agent

Part 1- Particulars of the Application
Application No: 2014/0249
Date of Application: 22 January 2014
Date Validated: 22/01/2014
Application Type: Scoping Opinion

Proposal: Request for Scoping Opinion for the required Environmental Statement (ES) relating to the mixed use redevelopment of the site

Location: Land at Bishopsgate Goods Yard, Bethnal Green Road, London, E1 6GY

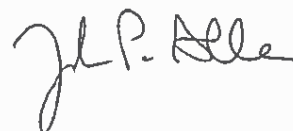
Part 2 – Particulars of Decision:

Thank you for consulting the London Borough of Hackney on the formal Scoping Opinion for the required Environmental Statement (ES) under the Town and County Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 for the proposed development above.

Please find attached the Borough's formal Scoping Opinion for the required Environmental Statement (ES) under the Town and County Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.

Date of Decision: 25 March 2014

Signed



John Allen
Assistant Director (Planning and Regulatory Services)
Legal, Human Resources and Regulatory Services

**EIA SCOPING OPINION UNDER
THE TOWN AND COUNTRY PLANNING
(ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2011**

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 an application for the redevelopment of
Bishopsgate Goods Yard*

Located at:

*Bishopsgate Goods Yard, Shoreditch High
Street, London*

Adopted by:

**LONDON BOROUGH OF TOWER HAMLETS
AND LONDON BOROUGH OF HACKNEY**

Report Status: *Final*
Applicant: *Bishopsgate Goods Yard
and Regeneration Ltd*
EIA Consultant: *URS*
Adoption and Issue date: *20/03/2014*
LBTH Case No: *PA/14/107*
Coordinator: *Harriet Peacock, LUC and
Cascade*

FOREWORD

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

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

The fact that London Borough of Tower Hamlets and London Borough of Hackney 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.

Please note, the London Borough of Tower Hamlets and London Borough of Hackney are the relevant planning authorities with respect to land within their administrative boundaries, and therefore cannot determine applications or adopt EIA Scoping Opinions on land outside of their jurisdiction. Whilst this EIA Scoping Opinion has been produced in a collaborative manner, reflecting the comprehensive nature of the proposed development, both boroughs adopt the EIA Scoping Opinion in respect to their own administrative boundary and publish the document on their own planning register.

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APPENDIX A – LBTH Consultation Lists

APPENDIX B – LBH Consultation Lists

APPENDIX C – LBTH External Consultation Responses

APPENDIX D – LBH External Consultation Responses

1. INTRODUCTION

Context

- 1.1. The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (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 proposed projects on the environment, so as to inform the process of decision making as to whether the development should be allowed to proceed, and if so on what terms (Carroll and Turpin, 2009).
- 1.2. 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.
- 1.3. Where a proposed development is determined to be an 'EIA development' the Applicant can ask the relevant planning authority for advice on the scope of the EIA (an EIA Scoping Opinion).
- 1.4. An EIA Scoping Report (URS, 2014) was received by the London Borough of Tower Hamlets (LBTH) and the London Borough of Hackney (LBH) as the 'relevant planning authorities' on behalf of Bishopsgate Goods Yard Regeneration Ltd on 21st January 2014.
- 1.5. The EIA Scoping Report requested an EIA Scoping Opinion for a proposed redevelopment at Bishopsgate Goods Yard, as the Applicant had determined that the development would constitute an 'EIA development'.
- 1.6. This document constitutes the EIA Scoping Opinion.

EIA Scoping Opinion

- 1.7. Land Use Consultants (LUC) and Cascade Consulting have been commissioned by LBTH and LBH to provide a critical review of the EIA Scoping Report for the Bishopsgate Goods Yard development (LBTH reference number: PA/14/00107).
- 1.8. The EIA Scoping Report was submitted to LBTH and LBH by URS, on behalf of the applicant, Bishopsgate Goods Yard and Regeneration Ltd. This is a cross-boundary application with the western part of the proposed site located in LBH, however the majority of the site lies within LBTH.
- 1.9. This EIA Scoping Opinion outlines the opinion on the proposed scope of the EIA (based on the information provided to date), and identifies any suggested amendments and/ or concerns.
- 1.10. In addition to the information provided by the Applicant, this EIA Scoping Opinion has been drawn up with reference to the following documents:
 - EIA Scoping Guidance (LBTH, 2012);

- LBTH and LBH's previous comments on the EIA Scoping Discussion Document, and previous review of a Draft Scoping Report submitted to LBTH and LBH by URS in September 2013;
 - relevant site history, including the previous planning applications and permissions for the site;
 - interactive map from LBTH and supplementary site visit;
 - consultation with internal LBTH consultees and external environmental consultees; and
 - LBTH's Local Plan – made up of the Core Strategy (LBTH, 2010) and Managing Development Document (MDD) (LBTH, 2013).
- 1.11. The issuing of this EIA Scoping Opinion does not prevent the planning authority from requesting 'further information' at a later stage under Regulation 22 of the EIA Regulations.
- 1.12. 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.

Report Structure

- 1.13. The contents of the remainder of this EIA Scoping Opinion are set out below.
- 1.14. Chapter 2 details the Councils' understanding of the proposed development.
- 1.15. Chapter 3 reviews the overall approach to the EIA in the context of prevailing EIA legislation.
- 1.16. Chapter 4 provides a review of the proposed scope and approach to assessment of each of the following EIA topics:
- Demolition and Construction;
 - Waste and Recycling;
 - Socio-Economics;
 - Ground Conditions;
 - Traffic and Transport;
 - Wind Microclimate;
 - Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution;
 - Air Quality;
 - Noise and Vibration;
 - Water Resources, Drainage and Flood Risk;

- Archaeology;
 - Built Heritage;
 - Ecology;
 - TV and Radio (Electronic) Interference; and
 - Townscape Visual and Conservation Assessment.
- 1.17. Chapter 5 reviews those assessments scoped out of the EIA.

2. THE PROPOSED DEVELOPMENT

Site and Surrounding Area

- 2.1. Bishopsgate Goods Yard Regeneration Ltd is seeking to obtain part outline and part detailed (full) planning permission (forming a 'hybrid' planning application) for Bishopsgate Goods Yard.
- 2.2. The site is approximately 4.7 hectares (ha) in size and is bounded by Bethnal Green Road to the north, Brick Lane to the east, a rail line (serving Liverpool Street Station) to the south and Shoreditch High Street to the west. Braithwaite Street runs through the site connecting Bethnal Green Road to Commercial Street.
- 2.3. For the purpose of the EIA Scoping Report the following description was provided for the proposed development:

'A planning application covering the entirety of the site seeking part outline and part detailed (full) planning permission. This will provide the context for bringing forward the parameter based outline elements by way of subsequent reserved matters applications.

- *The detailed elements of the application will be submitted for development plots referred to as Plots C, F, G and H, I, J at ground level (as discussed below).*
- *An accompanying application for listed building consent will also need to be submitted for the proposed works to and re-use of the listed arches (predominantly Plot H and L) and other listed structures within the site.*

The proposed quantum of development has been established by the Interim Planning Guidance (IPG) adopted for the site informed by on-site constraints and visual / heritage consideration as well as other environmental factors. This provides for the following draft mix of uses/floor space:

- *Provision of up to 180,000 m² Gross External Area (GEA) comprising of 6 residential buildings (equating to up to 1420 units).*
- *An office complex providing up to 60,000 m² (GEA);*
- *Retail provision throughout the scheme of up to 20,000 m² (GEA); and*
- *Substantial public realm, including a new raised park'.*

Consultation

- 2.4. The EIA Regulations require that the relevant planning authority consults 'consultation bodies' prior to issuing an EIA Scoping Opinion. Both LBTH and LBH have independently consulted on the EIA Scoping Report.
- 2.5. The LBTH internal and external specialists consulted are listed in **Appendix A**, and the LBH internal and external specialists consulted are listed in **Appendix B**.

2.6. The LBTH external responses received included in **Appendix C**, and the LBH external responses received included in **Appendix D**.

Adjoining Planning Authorities

2.7. Adjoining planning authorities have been consulted on the EIA Scoping Report and their comments are set out below.

2.8. Southwark Council have no objection to the proposed development, but given the location of the site within a strategic view it is requested that a full views impact assessment be undertaken, including fully rendered views, to identify and analyses any impacts on the protected views.

2.9. The Royal Borough of Greenwich has formally considered the EIA Scoping Report and raises no objections. The Royal Borough of Greenwich would like to be formally notified of any future planning application to develop the site.

2.10. The City of London notes that the ES does not include reference to the St Paul's Heights policy which aims to protect and enhance local views of St Paul's Cathedral and its setting and backdrop. Paragraph 6.25.5 should include references to the City of London's St Paul's Heights policy. Regard should be had to the impact of the development on the backdrop of St Paul's Cathedral, particularly from viewing points on the South Bank (London View Management Framework (LVMF) view 16B), Waterloo Bridge and Hungerford Bridge.

2.11. Table 1 and Figure 7 do not fully represent the number of schemes in the City that the City of London would expect to be included in the assessment of cumulative effects. The following sites should be added:

- Mitre Square;
- Tenter House;
- 101 Moorgate;
- 15 Bishopsgate; and
- Broadgate Circle and 3 Broadgate.

2.12. The proposed buildings would be tall enough to be prominent new landmarks in the area east of and within the eastern parts of the city and may also be of sufficient height to feature in other well-known views. The EIA should demonstrate the impact on local views.

3. REVIEW OF APPROACH TO EIA

3.1. This section comments on the over-arching approach to the EIA, as described in Chapters 1-5, Chapter 6 (Sections 6.1 to 6.6), and Chapter 8 of the EIA Scoping Report.

3.2. The applicant has determined that the development will constitute 'EIA development' as the scale of the development proposals could give rise to significant effects on the environment.

3.3. The EIA Scoping Report states that the application will be a 'hybrid' application, comprising part-outline and part-full. The EIA Scoping Report defines the elements for which detailed and outline permission is sought. The EIA Scoping Report confirms that for the outline application elements of the development, a 'reasonable worst case scenario will be assumed' (para. 6.2). This is in line with good practice and the LBTH EIA Scoping Guidance.

3.4. LBTH has previously requested additional detail on this matter, and would welcome further detail at this stage. This is important in determining whether the scope of the proposed assessment is suitable, specifically in relation to the outline aspects of the application. URS have since stated that a schedule based on the maximum and minimum parameters, units mix etc. will be used, and therefore no assumptions have had to be made to derive the population figures etc.

3.5. The EIA Scoping Report complies with the minimum requirements for a request for an EIA Scoping Opinion, as set out in the EIA Regulations. The EIA Scoping Report satisfactorily provides a brief description of the nature and purpose of the development, and the conditions on the site at present. A clear description is provided of the proposed EIA method, which complies with good practice. The EIA Scoping Report also outlines the types of 'Alternatives' which will be considered in the ES, including a Do Nothing scenario, and different development massing and design options. The ES will summarise the evolution of the current design proposal, the modifications which have taken place. The EIA Scoping Report states that the ES will provide a '*summary of the main alternatives considered, such as alternative use mixtures, floor heights, massing, and materials used will be presented together with a justification for the final design*' (para. 6.10.1 of EIA Scoping Report).

3.6. Table 3.1 below assesses whether the EIA Scoping Report meets the requirements set out in the EIA Regulations (Section 13), whilst Table 3.2 assesses whether it meets the requirements set out in LBTH's EIA Scoping Guidance.

Table 3.1: Review of Contents of the EIA Scoping Report in Respect to the EIA Regulations

EIA Regulation Requirement	Requirement met in EIA Scoping Report?
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A plan sufficient to identify the land.	A plan showing the location of the proposed development sites is provided in Figure 1 and 2.
A brief description of the nature and purpose of the development and of its possible effects on the environment.	Descriptions of the particular features of the proposed development and their possible effects on the environment are provided in Section 6.
Such other information or representations as the person making the request may wish to provide or make.	As appropriate.

Table 3.2: Review of Contents of the EIA Scoping Report in Respect to LBTH’s EIA Scoping Guidance

LBTH Scoping Requirement	Guidance	Requirement met in Draft EIA Scoping Report?
Description of the development		Yes. Chapter 2.
Conditions present on site and surrounding area		Yes. Chapter 3.
How alternatives will be considered		Yes. Chapter 6.
Initial assessment of micro-climate implications		No. The EIA Scoping Report contains a summary of the potential microclimate impacts of the proposal (Chapter 6), but no initial assessment as required by Section 2.6 of the LBTH Scoping Guidance.
List of cumulative developments		Yes. Chapter 6.
Overall methodology for the ES		Yes. Chapter 6.
Organisations consulted as part of Scoping.		Yes. Chapter 4.
Initial topic-by-topic assessment		Yes. Chapter 6.
Details of any supporting material to be submitted		Yes. Chapter 6.
Proposed contents of the ES		Yes. Chapter 6.

General Points

- 3.7. The EIA Scoping Report confirms that underground constraints will be considered. LBTH welcomes recognition of this issue.
- 3.8. Both LBTH and LBH previously commented that additional maps should be included in the EIA Scoping Report. While maps for traffic assessment, surrounding daylight receptors, built heritage, viewpoints and cumulative developments have been included, maps showing the following should also have been included in the EIA Scoping Report: surrounding noise and air quality receptors.
- 3.9. Figure 4: 'Local Constraints and Sensitivities' is helpful, but the locations of the numbered list of leisure and other community facilities are not shown on the map.
- 3.10. The ES should differentiate between measures that have been incorporated into the design of the development, and those additional measures required to mitigate adverse effects.
- 3.11. LBTH is keen to understand how mitigation measures/ enhancements measures are going to be secured. It would therefore be helpful if the ES could identify potential conditions based on these mitigation measures.
- 3.12. It is requested that all correspondence with consultees (including LBTH and LBH) is appended to the ES.

Overview of the Proposed Development

- 3.13. There are a number of points that appear to be incorrect in Sections 1 to 4 as follows:
 - with respect to paragraph 1.1.4, the correct name for the second conservation area is 'Brick Lane and Fournier Street';
 - with respect to paragraph 2.1.3, Plot L contains the listed arches and Plot K is the two small development parcels to the south of the railway line. The text in the report implies the opposite;
 - with respect to paragraph 2.1.11, current proposals show that development on plot E will not be over the East London Line, but to the south of it;
 - with respect to paragraph 1.1.12, while DEFRA just refers to this part of Hackney being an AQMA for NO₂ the LBH Air Quality Action Plan published in 2006 refers to both NO₂ and particulate matter;
 - with respect to paragraph 3.1.1:
 - bullet one – it is not just views from the conservation areas that should be considered, but also the impact on their character as a whole;
 - bullet two - sensitive receptors also include non-designated heritage

assets such as (but not exclusively) the Weavers Cottages and Non-conformist Mission Chapel on Sclater Street, the unlisted arches above London Road and the unlisted boundary wall around the site; and

- with respect to paragraph 4.1.3, the Historic Royal Palaces should also be consulted, given the impact on the setting of the Tower of London.

Submission Documents

- 3.14. The planning application should be accompanied by a copy of the ES, both as a hard copy and electronically. A minimum of three copies of the ES will need to be provided to LBTH.
- 3.15. A further three copies (both hard and electronic) of the ES should be sent directly to the Council's EIA Consultants – address to be supplied separately.

4. REVIEW OF POTENTIAL ENVIRONMENTAL EFFECTS BY TOPIC

- 4.1. This section summarises the review of the proposed approach to the assessment of each EIA topic.
- 4.2. This section provides a review of the proposed approach to the assessment of each EIA topic, in relation to the:
- scope of assessment;
 - methodology and reference to best practice guidance;
 - survey work proposed;
 - receptors identified;
 - consultees; and
 - policy documents referenced.

Review of Section 6.2: EIA Methodology

- 4.3. The EIA must consider the potential significant effects on both external and internal receptors (i.e. those introduced as a result of the proposed development).
- 4.4. Whilst paragraph 6.2.6 sets out that moderate effects are considered to be "likely significant effects", it would also be useful to identify the terminology to use throughout the ES with respect to significance; for example neutral, minor, moderate, major. This was highlighted in the review of the Draft EIA Scoping Report.
- 4.5. The determination of the significance of the effects is not set out in the EIA Scoping Report (e.g. importance, magnitude of change or matrices) and therefore LBTH is unable to comment on this, at this time. It is recommended that this is agreed with the relevant technical specialists prior to submission of the planning application, to ensure that there are no discrepancies post-submission.
- 4.6. The ES should clearly set out how the significance has been determined for each discipline in the ES.
- 4.7. Paragraph 6.17.21 refers to an indicative scheme – this the first mention of this approach, and should be clarified earlier in the document. This was highlighted in the review of the Draft EIA Scoping Report.

Review of Section 6.4: Scale and Layout Parameters

- 4.8. The EIA Scoping Report states that a '*3-dimensional envelope which represents the upper limit (maximum extent) of the outline development will be assumed for the purposes of the EIA*'. The EIA Scoping Report now clarifies that the maximum extent of the development will not always be the worst scenario, and that technical specialists will use their professional

judgment to determine a reasonable worst case scenario if different. It states that *'In cases where the minimum development envelope will give rise to the "worst case scenario" that will instead be assessed'*.

- 4.9. The topic specific sections do not fully explain how the 'reasonable worst case scenario' has been determined. It would be helpful to provide this information, as it provides an opportunity to agree the proposed approach, prior to submission. This was highlighted in the review of the Draft EIA Scoping Report. This is particularly important for the outline element, as there is more flexibility in what can be progressed. Without more detailed information on the proposals it is difficult to ascertain how this is going to be determined and then assessed e.g. affordable housing provision/ child yield/ transport.
- 4.10. If upon submission it is determined that the likely significant effects are unclear/ unknown, it is likely that request for further information will be made under Regulation 22 of the EIA Regulations.
- 4.11. Plans showing the location of receptors should be included in the ES. A figure showing the site, the phasing and any changes in access and egress should be provided.

Review of Section 6.8: Impact Interactions and Cumulative Impact Assessment

- 4.12. The EIA Scoping Report contains a list of the developments which are proposed to be used to assess the cumulative effects in each of the ES chapters. The schemes selected are all within 1 km of the site, and also conform to a number of other criteria, reflecting their scale. Schemes which are under construction, granted consent, and those with a resolution to grant consent have been considered. This is not the procedure that has been agreed with LBTH and LBH, as planning applications that have been submitted but not yet approved are also to be considered, and this has been reflected in the list of cumulative developments agreed.
- 4.13. It is also important to note that a threshold of over 50 residential units or 10,00m² of floorspace should not be strictly adhered to. Smaller sized schemes can easily have major servicing i.e. Heavy Goods Vehicles (HGV) and Manned Ground Vehicles (MGV) impacts and thus queue length implications.
- 4.14. The list of cumulative developments was agreed with LBTH and LBH in December 2013. Please note that since then, Land at Fakruddin Street (4) and Huntingdon Industrial Estate (10) are now pending refusal and therefore it is recommended that these are removed from the list. Also, the reference number for Beagle House should be PA/14/00225 as the previous application has now been deleted.
- 4.15. A further application (2013/3567) relating to the development known as Shoreditch Village (2012/3792) has received a resolution to grant planning permission from LBH Planning Sub-Committee. This application increases the height of the hotel element to 10 storeys. 145 City Road (2012/3259) has now been granted.

- 4.16. The City of London state that Table 1 and Figure 7 do not fully represent the number of schemes in the City that the City of London would expect to be included in the assessment of cumulative effects. The following sites should be added:
- Mitre Square;
 - Tenter House;
 - 101 Moorgate;
 - 15 Bishopsgate; and
 - Broadgate Circle and 3 Broadgate.
- 4.17. It is recommended that the list of cumulative developments is reviewed regularly to ensure that all relevant current applications are captured for EIA purposes. An appropriate 'cut off' date can be agreed with the LBTH/ LBH i.e. after design freeze, if necessary, to allow for the assessment to be completed prior to submission.
- 4.18. The EIA will need to carefully assess the effect that proposed development has both on, and with, cumulative developments.
- 4.19. The EIA Scoping Report states that the cumulative chapter in the ES will also draw together the findings from each chapter to analyse the interactions between effects and to provide a summary of the cumulative effects of the development. This approach to the assessment of cumulative effects is considered acceptable.
- 4.20. LBTH is finding that separate developments in the borough are referencing the same existing capacity (e.g. school places, public transport capacity etc.) leading to an underestimation of the cumulative effects and insufficient mitigation. The EIA will therefore need to carefully assess cumulative effects, and demonstrate this in the ES.

Review of Section 6.9: Consideration of Climate Change within the EIA

- 4.21. The potential impacts of climate change will be considered as necessary in each environmental topic e.g. air quality, flood risk, and will use the UK Climate Projections 2009 as the basis. Potential ways to mitigate the development's impact on climate change have been highlighted (e.g. reduced energy usage, minimising CO₂ emissions during construction and operation). It is also important for the proposals to include climate change mitigation and adaptation measures as detailed in the LBTH EIA Scoping Guidance.
- 4.22. The EIA Scoping Report identifies that standalone energy and sustainability strategy would be produced and submitted in support of the application. Whilst this is supported, we should highlight the need to include the proposals identified in the energy/ sustainability documents into the relevant technical chapters i.e. plant specification included in the air/ noise chapters, renewable energy technologies/ flue details included in the visual impact assessment.

- 4.23. The EIA Scoping Report identifies that the development will be assessed against future climate change scenarios as identified in the Mayors climate change adaptation strategy which are the same as recommended in LBTH's EIA Scoping Guidance, so this is also supported.

Review of Section 6.10: Alternatives Assessment

- 4.24. The EIA Scoping Report outlines the types of 'Alternatives' which will be considered in the ES, including a 'Do Nothing' scenario, and different development massing and design options. This is clearly described and broadly complies with the scoping guidance.

Review of Section 6.11: Demolition and Construction

- 4.25. The ES chapter will provide an overview of the works required during demolition and construction activities. As most of the site has been previously cleared, it is assumed that the bulk of the demolition activities have been completed but it would be helpful to confirm this in the ES.
- 4.26. LBTH has previously requested information regarding the treatment of the arches, and additional detail on this is still required (to be provided in the ES). Consideration should be given to including excavation works as a separate section, as the requirements for excavation across the site could be considerable.
- 4.27. Information will be provided on site access and egress, and any changes to these locations over the 12 years construction period should be highlighted. Working hours, HGV movements and estimates of demolition, excavation and construction waste will be provided, as will the quantities of materials to be used during construction.
- 4.28. An indicative construction programme will be provided, and will be broken down into a number of phases identifying the main activities. The overarching phases should be identified, including any overlap. This use of a solely indicative phasing strategy will need to be discussed further with LBTH and LBH, as it leaves a lot of uncertainty around what would be the likely significant effects. This is particularly pertinent with respect to the outline element.
- 4.29. Within the phases, time slices will be identified to allow the technical environmental assessments to assess the worst case scenario. A figure showing the site, the phasing and any changes in access and egress should be provided in the ES.
- 4.30. It is important that the receptors introduced during the demolition/ construction phase are appropriately assessed. It is therefore recommended that the time slices to be assessed are agreed prior to the submission of the ES to ensure that all parties are in agreement. URS has confirmed that the proposed time slices will be agreed prior to the submission of the planning application.
- 4.31. The chapter should also provide an indication of the typical plant to be used during the works, and whether the particular plant is required for a particular

phase.

- 4.32. The chapter will also provide a framework of the Construction Environmental Management Plan, Code of Construction Practice and Site Waste Management Plan. These will take into account best practice guidance. The ES should identify who will be responsible for preparing and implementing these documents.
- 4.33. When considering demolition and construction waste (paragraph 6.10.5) the Applicant should also indicate its intentions regarding re-use, recycling and disposal of the waste.

Network Rail

- 4.34. Network Rail is aware of this proposed application and is in dialogue with the developer. Network Rail has no further comment to make.

Review of Section 6.12: Waste and Recycling

- 4.35. This section of the EIA Scoping Report has been reviewed by LBTH's Waste Officer. Waste management needs to be considered in two phases - construction/ demolition phase and post construction/ operational phase. A detailed Site Waste Management Plan has been proposed in the EIA Scoping Report which covers all aspects of waste management during the first phase (construction/ demolition).
- 4.36. Post construction phase will be determined by the development itself. The EIA Scoping Report has proposed to carry out waste and recycling assessment which will consider all the potential impacts of the development and will identify all the mitigation measures for any adverse effects. Capacity and storage space for the development will be determined by the number of units proposed and other internal management arrangements. That will be assessed once full details of the development is presented.
- 4.37. The ES should identify who is responsible for the Site Waste Management Plan.
- 4.38. The ES chapter should identify the current capacity at waste disposal sites, and identify whether there is sufficient capacity for the development and cumulatively.
- 4.39. When estimating total waste arisings, the ES should include the proportion that will be re-used on site and whether such re-use requires some processing (for example, concrete crushing).
- 4.40. Where waste processing is to take place on site, the impacts of this, such as of noise and air quality, should be assessed.
- 4.41. The mode of waste transfer should be identified and where this is by road, the number of vehicle movements should be taken into account in the traffic impact assessment.
- 4.42. Sources of data relating to waste have been referenced using up to date data.

Local, Regional and National waste guidelines will be adhered to. The LBTH DPD is a primary reference document.

- 4.43. The assessment is based on an overview of how the developer will manage waste during and after construction. This is acceptable considering there will be a Site Waste Management Plan, although further consultation will be required when the plans are prepared.
- 4.44. With waste management, the major issues are location of bin stores in relation to collections and capacity. It is therefore difficult to identify the potential implications of the development in relation to waste management until it is known what method of waste storage will be used (underground or conventional bins), and how it will be collected – i.e. access to the site and whether or not the vehicle will be able to achieve turning circles etc.
- 4.45. An overview of the waste management strategy for each operational phase of the development should be provided.

Review of Section 6.13: Socio-Economics

- 4.46. The scope of the assessment is clearly defined and includes an assessment of the socio-economic effects of the development during demolition, construction and operation. The assessment will be in-line with LBTH's EIA Scoping Guidance and will include direct, indirect and induced employment effects during the construction phase of the development and once the development is operational, plus broader social and community effects of the development and the development's effects on climate and climatic factors. The potential effects of the development on socio-economics are clearly discussed, and as such the scope of the assessment is appropriate.
- 4.47. A review of the relevant policy at the local (LBH and LBTH), regional (Mayor of London, GLA) and national levels (in terms of urban regeneration and sustainable economic development) will be undertaken to identify the key issues of relevance to the development and to refine the scope of the assessment.
- 4.48. The child yield assessment should be based on LBTH's Planning Obligations SPD.
- 4.49. The Applicant should note that data from the 2011 census at a range of geographies including ward, lower super output area and postcode have now been published by the Office of National Statistics (ONS). LBTH would expect the Applicant to draw heavily on these data.
- 4.50. The ES chapter will include a baseline assessment providing a description of the existing socio-economic conditions on and around the site including: population and labour force, skills and unemployment, housing and the local economy. The baseline assessment will also provide a review of the community and social facilities including: schools, primary healthcare facilities, community facilities, open space and child play space. The baseline information should be informed not only through desk study, but in consultation with relevant stakeholders. To be in-line with the LBTH's EIA

Scoping Guidance, the socio-economic characteristics of the Borough as a whole and the London region should also be considered.

- 4.51. The assessment should appropriately assess the loss of the existing land uses, and where these will be relocated.
- 4.52. The assessment of new residential units should also specifically assess the provision of affordable housing, and how this correlates with the two Councils affordable housing target i.e. 35% (LBTH) and 50% (LBH). If these targets cannot be met on-site, but will instead be secured through financial contributions and/ or off-site locations, the ES should consider these effects.
- 4.53. Specific criteria for assessing the significance of effects on socio-economics have now been included. The EIA Scoping Report outlines how the significance of effects will be determined and how effects will be classified (e.g. negligible, minor, moderate, major).
- 4.54. No survey work is proposed. As previously mentioned in the review of the Draft EIA Scoping Report, this is acceptable providing existing data is up-to-date, otherwise additional work may be required.
- 4.55. LBTH and LBH are keen to understand how employment figures will be calculated, particularly for the outline element.

Health

- 4.56. This section of the EIA Scoping Report has been reviewed by LBTH's Public Health Strategist.
- 4.57. The proposed development is in the North West locality encompassing LAPs 1 and 2, and current list sizes are set out in Table 4.1.

Table 4.1 - Current List Sizes

Practice	Lap	List Size	WE GP Total	Patients per WTE
Bethnal Green Health Centre Practice	LAP 1	8271	5.00	1654
Mission Practice	LAP 1	11556	7.25	1594
Blithehale Medical Centre, The	LAP 1	8236	2.25	3660
Globe Town Surgery	LAP 1	12310	5.50	2238
Pollard Row Practice	LAP 1	4879	1.78	2741
Strouts Place Medical Centre	LAP 1	4153	3.25	1278
XX Place	LAP 2	7267	7.20	1009
Albion Health Centre	LAP 2	9072	5.27	1721
Spitalfields Practice	LAP 2	13006	5.00	2601
Totals		78750	42.50	1853

Note: Health E1 which is a specialist practice for homeless patients has been excluded from the above list

- 4.58. As the LBTH population model is undergoing revision, it is suggested that the Greater London Authority (GLA) 2012 round ward projections (these incorporate census data) are used to estimate the locality population at anticipated time of occupation of the development.
- 4.59. The HUDU model can be used to estimate net additional population arising for the development if needed.
- 4.60. When calculating the effect of the proposed development on health facilities, the work time equivalent (WTE) of General Practitioners (GPs) plus existing list sizes should be used, not just the total number of GPs available from NHS England (London region). This is because many GPs in LBTH do not work full time, and therefore it is not appropriate just to use the number of GPs available at any one surgery. This information should be available from NHS England (London region).
- 4.61. A capacity analysis can then be undertaken for the locality using a GP to patient ratio of 1:1800.

Review of Section 6.14: Ground Conditions

- 4.62. This section of the EIA Scoping Report has been reviewed by LBTH's Contaminated Land Officer.
- 4.63. The approach outlined is generally acceptable, although reference should be made to current good practice guidance that will be adhered to in the assessment.
- 4.64. A comprehensive ground investigation of the site was completed by Concept in 2008. This was used by ARUP who completed a ground contamination risk assessment and produced an outline remediation strategy for the site. No further on-site investigation was considered necessary as an output of this process.
- 4.65. The previous site investigation report and remediation strategy will be used to inform the desk based impact assessment. These documents should be provided as technical appendices to the ES chapter.
- 4.66. The data used and the findings and conclusions of these reports should be reviewed, revised and updated to take account of current guidelines, standards and codes of good practice. Assessments based on out of date or superseded guidelines, standards and codes are not acceptable.

Review of Section 6.15: Traffic and Transport

- 4.67. LBTH and LBH Highways Officers have previously provided comments on the Draft EIA Scoping Report.
- 4.68. The ES chapter will assess the effects of the development on traffic and transport associated with the demolition, construction and operation of the development on the surrounding road networks. The ES chapter will be informed by the findings of the Transport Assessment (TA). The scope of the TA will be driven by the delivery of the potential effects to be assessed, which are largely consistent with the LBTH's EIA Scoping Guidance. The scope of the TA has been issued to officers of Transport for London (TfL), LBH as well as LBTH. It is anticipated that a pre-application meeting will take place soon to agree the scope of highway and transport works. This approach is considered appropriate, and should agree items such as the network/ peak hours to be assessed.
- 4.69. The scale and extent of the assessment will be defined in accordance with TfL's Transport Assessment Best Practice Guidance document (April 2010), National Planning Policy Framework (2012), the DfT Guidance on Transport Assessment document (March 2007), specific LBH and LBTH requirements and IEMA 1993 Guidelines for The Environmental Assessment of Road Traffic. This is appropriate for the assessment and is consistent with the LBTH Scoping Guidance. Guidance provided by the IEMA and Department for Transport (DfT) will be consulted in order to identify significance criteria applicable to the assessment. As raised during the review of the Draft EIA Scoping Report, the approach to assessing significance should be submitted to LBTH as part of the scoping process.

- 4.70. A number of traffic and pedestrian surveys will inform the traffic and transport baseline conditions. The EIA Scoping Report now identifies that the effect of the development on each mode of transport will also be assessed in detail, with mitigation measures being proposed, where appropriate. The effect of the development will be assessed with regard to; severance, delay, fear and intimidation, amenity, and accidents and safety, in accordance with IEMA guidance.
- 4.71. With regards to paragraph 6.15.12, although there is reference to cycling infrastructure there is no reference to cycling permeability through the site. LBTH has aspirations to open up the site and improve permeability to both pedestrians and cyclists. Whilst the EIA does mention the pedestrian routes through the sites in this paragraph, it doesn't mention cycling through the site.
- 4.72. The EIA Scoping Report states that a Construction Logistics Plan is to be prepared as a separate document for the planning application, which would detail likely construction traffic routes.
- 4.73. The impacts of trip generation movements on the road network should be shown as a percentage increase in trips over the baseline, and the impact on junction capacity.
- 4.74. The construction traffic assessment should consider both vehicles bringing material/ equipment to/ from the site, as well as construction staff movements i.e. the ES needs to consider how the workers will get to site (e.g. by car (parking on/ off site) and/ or via public transport) and the effects that this will have on the network capacity.
- 4.75. Likely construction traffic routes should be established, so that receptors can be appropriately assessed.
- 4.76. Consideration should also be given to LBTH's Local Plan i.e. with respect to acceptable parking levels.
- 4.77. The EIA Scoping Report does not include water transport as a mode. The ES should set out whether there is the potential for demolition/ construction material to be moved by water, and/ or for site users to utilise water transport to/ from the site. If water transport is not going to be utilised as a transport mode during either construction/ or operation, or the effects are not considered to be significant, this should be clearly set out in the ES.

Review of Section 6.16: Wind Microclimate

- 4.78. Wind tunnel testing will be undertaken for the development (as the heights of the buildings are over 10 storeys) with the following scenarios modelled; existing baseline (to quantify existing conditions in and around the site); interim construction scenario (to take account of 12 year programme); completed development with existing surroundings; and completed development with cumulative schemes. The wind conditions will then be assessed using the Lawson Comfort Criteria.
- 4.79. The assessment should include consideration of the effects on the wider

- neighbouring area. It is unclear what is meant by *'selected roof terraces and balconies will be tested'*. Consideration should also be given to the wind climate to be experienced on balconies and roof terraces accessible by residents.
- 4.80. The significance of the impacts prior to mitigation should be stated within the chapter. Due to the size and complexity of the development, it is recommended that a final wind tunnel test be undertaken with the completed development and mitigation measures to ensure these are sufficient to achieve the necessary wind conditions both on and off site.
- 4.81. It would be useful if the surrounding receptors were shown on a figure, and the types of receptor (thoroughfare, balcony, entrance etc.) clearly differentiated on the supporting figures.
- 4.82. The ES should identify the effects both pre and post mitigation. Landscaping should only be included pre mitigation if the landscaping plans are to be approved.
- 4.83. A full statistical breakdown of the wind microclimate should be provided. All data should be submitted in a form which can be independently verified and should include digital copies of any drawings, 3D models, calculation sheets, etc.

Review of Section 6.17: Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution

- 4.84. This section of the EIA Scoping Report has been reviewed by LBTH's Environmental Health Officer.
- 4.85. Paragraph 1.1.12 to 1.1.14. (Light Pollution) should demonstrate the Institute of Lighting Professionals (ILP) standard to be used and its impact on surrounding buildings as well as nuisance during post curfew periods.
- 4.86. Paragraph 1.1.51 and Figure 12 shows the surrounding residential receptors should be checked again to ensure that no properties are omitted including amenity areas.
- 4.87. For the avoidance of doubt the residential properties to be included in the assessment of the impacts of the development on daylight and sunlight levels at sensitive receptors should include residential components of schemes identified and agreed with LBTH and LBH for cumulative impacts assessment (paragraph 6.17.2).
- 4.88. An internal daylight and sunlight assessment must be included in the ES. This has been previously flagged by LBTH as its preferred approach to ensure all significant effects are addressed in one place. Although the method for determining significance may be different i.e. for the internal assessment you are not assessing against a baseline, but determining adequacy, this could be explained in the methodology.
- 4.89. Following discussions with Delva Patman Redler, LBTH and LBH's independent reviewer of daylight and sunlight assessments, the Applicant has

put forward an acceptable approach to the 'mirror image' assessment (paragraph 6.17.28).

- 4.90. A figure showing the neighbouring properties to be included in the analysis, as detailed in para 6.17.51, has been provided (Figure 12).
- 4.91. As previously discussed with URS, it is useful for the actual assessment criteria for Vertical Sky Component (VSC) and No Sky Limit (NSL) to be agreed at the EIA Scoping stage. The appropriate bands that should be used for VSC and NSL are:
- 0% to 19.9% - Negligible significance;
 - 20-29.9% reduction – Minor significance;
 - 30-39.9% reduction – Moderate significance; and
 - above 40% reduction – Major significance.
- 4.92. It is also helpful for 'pass/ fail' to be included for the daylight and sunlight tables.
- 4.93. Where low levels of daylight in the outline elements of the development are apparent from the VSC calculations, it would be helpful to provide Average Daylight Factor (ADF) values for notional window and room sizes for the worst affected areas so as to establish that it is possible to avoid the creation of rooms in residential properties that are so dark as to be effectively uninhabitable.
- 4.94. 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.
- 4.95. Light Pollution should be assessed to meet ILP guidance for post curfew periods with appropriate contour lines especially on surrounding residential dwellings during sensitive hours of sleep/ rest in order to ascertain any likely light nuisance impact.
- 4.96. Data should be provided in the chapter as a table, showing the existing, proposed and cumulative situations. All data should be submitted in a form which can be independently verified and should include digital copies of any drawings, 3D models, calculation sheets, etc.
- 4.97. Mitigation methods should be provided where necessary.

Review of Section 6.18: Air Quality

- 4.98. The EIA Scoping Report has been reviewed by LBTH's Air Quality Officer. The approach to air quality assessment is generally acceptable.
- 4.99. The EIA Scoping Report does not illustrate the location of air quality receptors. The ES should include a figure(s) showing the location of identified air quality receptors.

- 4.100. The Applicant should clearly state in the ES whether the methodology for the outline and detailed elements of the development are the same.
- 4.101. While it is accepted that it may be necessary to undertake an assessment for more than one time slice corresponding to peak traffic, there may also be junctures within the development programme at which new receptors could have been introduced in the earlier phasing which would be located quite close to construction dust emissions from later phasing. These should also be considered as potential worst case scenarios.
- 4.102. The Applicant should set out the proposed approach to defining the future baseline for the "Opening Year – without development scenario". Current thinking is that the anticipated improvement in background air quality resulting from vehicle emission controls is not now likely to occur. When predicting future air quality a conservative approach should be taken and agreed with LBTH's air quality officer before proceeding. As no further information has been provided in the EIA Scoping Report, this will need to be agreed during the EIA process.
- 4.103. The diffusion tube locations should be shown on a figure in the ES, and confirmed as being appropriate with LBTH and LBH during the EIA process.
- 4.104. The ES should provide a transparent account of the modelling undertaken, all assumptions made and all input data (for example, traffic flows) used.
- 4.105. The assessment will include a prediction of the future baseline (i.e. the 'without development' scenario). The EIA Scoping Report does however, not indicate how it will be defined. It has long been assumed that background air quality will gradually improve in future years as a result of reductions in vehicle emissions. The expected improvement over the last few years has however, not materialised. As a result, many air quality assessments now assume no future improvements in background air quality until the next round of vehicle emission reductions begins to take effect. This will need to be clearly set out in the ES.
- 4.106. When assessing the heating plant emissions, consideration should be given to the fuel type, thermal rating and location of the equipment.

Review of Section 6.19: Noise and Vibration

- 4.107. Baseline noise survey should be carried out in consultation with LBTH and LBH Environmental Health Officers (EHOs). As the split between long-term and short-term monitoring is not explicit in the EIA Scoping Report, further consultation with LBTH and LBH will be required through the EIA process to confirm the approach to be taken.
- 4.108. There are concerns regarding groundbourne vibration due to the rail lines. The assessment of ground-borne noise from trains should be included and compared with the LBTH criteria (para. 6.18.4). Therefore, as previously flagged, the baseline surveys should also include baseline measurements of vibration due to the railway. The vibration assessment should meet the BS6472 criteria.

- 4.109. Impacts from piling should also be considered.
- 4.110. Construction noise levels at receptors should be calculated according to BS5228 and compared with ambient noise levels and with the LBTH Code of Construction Practice (para. 6.18.7).
- 4.111. Construction noise and vibration mitigation measures should be clearly described and residual impacts identified. Similarly mitigation and residual impacts of noise and vibration from fixed plant, traffic and the railway should be described. The ES needs to be very clear about the mitigation to be employed for groundbourne vibration given the concerns as raised in 3.57.
- 4.112. Road traffic noise, rail noise from docklands light railway (DLR) and aircraft noise (e.g. travelling to/from London City Airport) needs to meet the requirements of the Managing Development Document DPD (see Appendix 2, Table A2) and to demonstrate that the required glazing specification can meet the 'good' standard of BS8233.
- 4.113. The requirement for any Control of Pollution Act Section 61 applications should be referred to in the ES.
- 4.114. Paragraph 6.19.6 references LBTH's Unitary Development Plan – this has now been superseded and therefore reference should be made to the Council's Local Plan.
- 4.115. Paragraph 6.19.8 refers to a 10 year construction program – this does not correlate with paragraph 2.1.4 which states that construction will be undertaken over 12 years.

Review of Section 6.20: Water Resources, Drainage and Flood Risk

- 4.116. LBTH's Flood Engineer has reviewed the EIA Scoping Report, and is satisfied that the LBTH FRA has been referenced in section 6.20.17. Reference should also be made to the LBH FRA 2010. There is however, no mention of SuDS. Whilst mitigation measures for surface water flooding are mentioned, SuDS should top of the list for this - if found to be "not feasible/ viable", only then should alternatives be considered.
- 4.117. Whilst not sited in a designated flood risk area, for river or surface water flooding, reference should still be made to the relevant documents such as the LBTH's SFRA and the Surface Water Management Plan (SWMP).
- 4.118. A Flood Risk Assessment will be required for the development, due to its size (> 1ha) although the site is located in Flood Zone 1 and is considered to be at low risk of fluvial or tidal flooding. The requirements of the FRA are appropriately set out in the EIA Scoping Report. The EIA Scoping Report notes that the site is in an area of potential risk from surface water flooding (identified in the LBTH Strategic Flood Risk Assessment) and should therefore refer to the LBTH Preliminary Flood Risk Assessment and Surface Water Management Plan for more detailed information on this risk. The FRA will feed into a Water Resources ES Chapter.
- 4.119. The EIA Scoping Report has identified potentially sensitive receptors and a list

of potential impacts. The approach to assessing significance has been set out and follows LBTH's Scoping Guidance and use of the Department of Transport's TAG Unit 3.3.11: The Water Environment Sub-Objective.

- 4.120. The list of potential impacts and the scope of the FRA and Water Resources chapter covers most of the issues to be considered as set out in LBTH's EIA Scoping Guidance, and will include an assessment of the potential water demand and wastewater generation of the development (which should include volume estimates), and consideration of remedial measures such as water efficient fixtures and fittings.
- 4.121. Section 6.20 does not explicitly refer to climate change, although this is considered in a previous section. The FRA and Water Resources chapter will need to take into account potential impacts of climate change in the assessment.
- 4.122. The ES should identify on a map, all water sensitive receptors and their current condition established. Should dewatering be required to facilitate the construction of any basements, this will need to be appropriately assessed.
- 4.123. Mitigation should also consider best practice guidance to reduce pollution incidents, for example the Environment Agency Pollution Prevention Guidelines.
- 4.124. The bullet points in paragraph 6.20.26 do not appear to be consistent with one another. For example, a major effect is considered to be '*a magnitude of change on a water resource of high quality/importance*' however, a minor effect is considered to be '*a limited, very short or highly localised impact (i.e. low magnitude of change) on a water resource of high or medium quality*'. It is therefore unclear what the effect is for impacts on a high quality receptor i.e. are all impacts on high quality receptors a major effect as implied by the third bullet point? The second bullet point refers to a 'large impact' however, this is not the terminology used earlier in the chapter – it is assumed that this should be 'high impact' as set out in paragraph 6.20.22.

Environment Agency

- 4.125. The Environment Agency has provided a consultation response to both LBTH and LBH, which are summarise below.
- 4.126. The Environment Agency confirms that the EIA Scoping Report correctly identifies the site to be within Flood Zone 1. As the site is greater than 1 hectare the planning application will need to be accompanied by a FRA.
- 4.127. The Environment Agency has attached its factsheet for advice on FRA requirements on sites greater than 1 hectare – see Appendix B of this EIA Scoping Opinion.

Canal and River Trust

- 4.128. The Canal and River Trust notes that this application falls outside the notified area for its application scale. It therefore returned the application as there is no requirement for LBTH to consult Canal and River Trust in its capacity as a

Statutory Consultee.

Marine Management Organisation

4.129. Please can you inform the applicant that they may require a licence under the Marine and Coastal Access Act (2009).

4.130. Therefore please can they submit a licence enquiry via the Marine Licensing web portal so we can inform them as to whether a marine licence is or not required.

Port of London Authority

4.131. The PLA has no comments to make.

Thames Water

4.132. Thames Water has been consulted on the scope of the EIA and has stated that the provision of water and waste water infrastructure is essential to any development.

4.133. While Thames Water accepts that paragraph 6.11 covers demolition and construction, paragraph 6.19 covers noise and vibration and paragraph 6.20 covers water resources, drainage and flood risk we would make the following observations.

4.134. It is unclear at this stage what the net increase in demand on our infrastructure will be as a result of the proposed development. Thames Water is concerned that the network in this area may be unable to support the demand anticipated from this development. The developer needs to consider the net increase in water and waste water demand to serve the development and also any impact the development may have off site further down the network, if no/ low water pressure and internal/external sewage flooding of property is to be avoided.

4.135. It is also unclear as to how the building will be constructed, Thames Water is concerned that water mains and sewers immediately adjacent to the site may be affected by vibration as a result of piling, possibly leading to water main bursts and or sewer collapses.

4.136. We would therefore recommend that any EIA report should be expanded to consider the following.

- the developments demand for water supply and network infrastructure both on and off site and can it be met;
- the developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met;
- the surface water drainage requirements and flood risk of the development both on and off site and can it be met; and

- any piling methodology and will it adversely affect neighbouring utility services.

4.137. Should the developer wish to obtain information on the above issues they should contact our Developer Services department.

London Fire and Emergency Planning Authority

4.138. The Fire Authority needs to consider Access and Water Supplies. It has been identified that unless brigade access and water supplies are considered at an early stage, it can make for serious problems at the latter stages of the development. The Fire Authority therefore strongly recommends that the said information is made available to the Fire Authority at the earliest opportunity.

Review of Section 6.21: Archaeology

4.139. LBTH does not employ a dedicated archaeology officer and therefore relies on the advices of English Heritage Archaeology - Greater London Archaeology Advisory Service (GLAAS) (see below).

4.140. No response has been received from the Council for British Archaeology (and London and Middlesex Archaeological Society (LAMAS)) or the Greater London Archaeology Advisory Service (GLAAS) to date.

4.141. The ES chapter will assess the potential effects of the development on below ground heritage assets during construction. The scope of the assessment is appropriate and consistent with the EIA Scoping Guidance.

4.142. The specialist assessment should conform to standards set by the Institute for Archaeologists and other professional guidance, along with LBTH's EIA Scoping Guidance. It is recommended however, that the assessment should also follow advice in the Practice Guide for Planning Policy Statement 5 (PPS 5): Planning for the Historic Environment (Note: PPS5 policy itself is now replaced by the National Planning Policy Framework). Consultation with the Greater London Archaeology Advisory Service, who provides archaeological advice to LBTH, should be undertaken and reference should be made to its guidance document 'Standards for Archaeological Work'.

4.143. The baseline conditions of the site are briefly described in the EIA Scoping Report with reference to the findings of previous work undertaken by the Museum of London Archaeology (MOLA). It is also noted that further survey work will be carried out by MOLA for the site. It is recommended that information is also obtained from English Heritage's National Monuments Record (NMR) in addition to the bodies identified in the EIA Scoping Report. Paragraph 6.21.8 states that the EIA will provide recommendations to offset adverse effects. It should be noted that it is not always possible to offset adverse archaeological effects, this option will only be applicable in certain circumstances.

4.144. The ES should clearly identify the effects both pre and post mitigation.

4.145. Should dewatering be required to facilitate the construction of any basements, this will need to be appropriately assessed, as this can significantly affect

archaeological assets.

English Heritage (GLAAS)

- 4.146. The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter. GLAAS has provided a consultation response to both LBTH and LBH, which are summarised below.
- 4.147. The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should be required to submit appropriate desk-based assessments, and where necessary undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision.
- 4.148. Appraisal of this proposal using the Greater London Historic Environment Record and information provided indicates a need for further information to reach an informed judgment of its impact on heritage assets of archaeological interest.
- 4.149. The site is located within the Hackney South Shoreditch Archaeological Priority Area which has a high potential to contain archaeological remains from the Roman, Medieval, and Post-Medieval periods. Previous investigations undertaken by MOLA on the northern half of the site have uncovered evidence from each period including evidence of agricultural uses and urbanisation. The application will also affect designated and undesignated heritage assets of railway archaeological interest forming part of the world's first operational passenger railways – The Eastern Counties Railway of c. 1840.
- 4.150. In addition to the assessments proposed in this scoping opinion, I recommend that the EIA considers other relevant forms of reduction of harm to the designated and undesignated heritage assets as potential mitigation strategies. The EIA should also explore the potential to enhance or make a positive contribution towards these assets through effective building design.
- 4.151. The nature and scope of assessment and evaluation should be agreed with GLAAS and carried out by a developer-appointed archaeological practice before any decision on the planning application is taken. The ensuing archaeological report will need to establish the significance of the site and the impact of the proposed development.
- 4.152. Once the archaeological impact of the proposal has been defined, GLAAS can discuss mitigation options and make recommendations to the local planning authority. The NPPF accords great weight to the conservation of designated heritage assets and also non-designated heritage assets of equivalent interest. Heritage assets of local or regional significance may also be considered worthy of conservation. If archaeological safeguards do prove necessary, these could involve design measures to preserve remains in situ

or where that is not feasible, archaeological investigation prior to development.

- 4.153. Further information on archaeology and planning in Greater London is available at: <http://www.english-heritage.org.uk/professional/advice/our-planning-role/greaterlondon-archaeology-advisory-service/about-glaas/>
- 4.154. Please note that this advice relates solely to archaeological considerations and is without prejudice to the local authority's decision-making role. If necessary, English Heritage's Development Management or Historic Places teams should be consulted separately regarding statutory matters.

Review of Section 6.22: Built Heritage

- 4.155. LBTH Scoping Guidance for Cultural Heritage states that the assessment should consider the presence of designated areas of cultural heritage value at a national, regional or local level such as Conservation Areas, Listed Buildings (including the local list) Registered Historic Parks and Gardens (and Battlefields) and World Heritage Sites.
- 4.156. The EIA Scoping Report refers to listed structures/ buildings on the site; unlisted but historic structures within the site (including elements of the boundary wall that form part of the Fournier Street Conservation Area and the unlisted former chapel and weavers' houses on the south side of Sclater Street abutting the Goods Yard boundary) and heritage receptors beyond the site. The EIA Scoping Report now states that assets up to 500 m from the site will be considered within the assessment.
- 4.157. The EIA Scoping Report notes that there are a number of Conservation Areas in close proximity to the site, and now states how these will be assessed in para. 6.22.6. Reference should be made to LBTH Character Appraisals and Management Guidelines for relevant Conservation Areas.
- 4.158. The EIA Scoping Report notes that effect on the Tower of London WHS and protected views will also be considered. It should be noted that the LBTH EIA Scoping Guidance requires that impacts upon the World Heritage Site should include how the proposal would impact on the Outstanding Universal Value of this Heritage Asset, with reference to the Tower of London World Heritage Site Management Plan, the London World Heritage Sites SPG on Setting, Circular 07/09 on the Protection of World Heritage Sites and the accompanying English Heritage guidance to Circular 07/09 on The Protection and Management of World Heritage Sites in England.
- 4.159. The EIA Scoping Report notes that LBTH, LBH and English Heritage will be consulted on the list of assets to be included in the assessment. This is welcomed.
- 4.160. The method of assessment proposed is set out (i.e. how the sensitivity of the receptor will be judged, how the magnitude of change will be recorded and that these will be combined to provide a measure of significance). It will be important to consult with the Conservation and Design Officers at LBTH, LBH and English Heritage regarding the proposed method to ensure all parties are

happy with the method of assessment.

- 4.161. The Applicant should refer to any current guidance on assessment of heritage assets (e.g. the PPS 5 Practice Guide which remains valid pending the final outcome of the review of guidance supporting the NPPF <http://www.english-heritage.org.uk/publications/pps-practice-guide/pps5practiceguide.pdf>) and English Heritage's guidance on 'The Setting of Heritage Assets', 'Seeing the History in the View' And 'Conservation Principles, Policy and Guidance (2008).
- 4.162. English Heritage has previously advised that there should also be no distinction drawn between grade I and II* buildings and grade II buildings. The degree of protection afforded to listed buildings by the legislation does not distinguish between grades and as a national designation all grades should be regarded as 'high' importance.
- 4.163. English Heritage has also previously advised that there should be no distinction in sensitivity between Conservation Areas - as a national designation they should be historic assets of 'high' importance. If a distinction is then to be drawn in townscape terms between those of consistent architectural or townscape character that should be reflected in the magnitude of change and not in their importance. Table 1 will therefore need to be updated accordingly.
- 4.164. 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 (including the World Heritage Site) need to be fully explained and justified.

English Heritage

- 4.165. On the basis of the current submission, English Heritage has no comments to make to LBTH in regards to the submitted EIA Scoping Report.
- 4.166. It is noted that English Heritage are still actively engaged in pre-application discussions regarding the proposals on the site and their impact on the historic environment.

Review of Section 6.23: Ecology

- 4.167. LBTH's Biodiversity Officer has confirmed satisfaction with the proposed scope of the ecology assessment. LBH has also confirmed satisfaction with the scope of the assessment.
- 4.168. The scope of the ecology assessment proposed within the ES is clearly defined and is largely considered appropriate, incorporating reference to suitable policy documents, and consultees. It also proposes an appropriate range of survey types and potential ecological impacts requiring assessment, to build on an initial walkover and Phase I habitat survey, and some bird surveys.
- 4.169. The scope of the ecology assessment proposed covers all of the topics

- expected, including assessment of statutory and non-statutory sites, bats, birds (including black redstart), reptiles, and invertebrates. The relevant policy documents referenced, including the NPPF, the London Biodiversity Action Plan (BAP), and the Tower Hamlets BAP are also considered appropriate.
- 4.170. The survey work and methods proposed are largely considered adequate and appropriate. Any assessment should be based upon adequate survey information, undertaken at the appropriate time of year and in accordance with best practice guidance. No information is however, provided on how the significance of potential impacts will be assessed. This should be provided.
- 4.171. The range of consultation proposed, including with Natural England, the Environment Agency, Greenspace Information for Greater London, the London Bat Group and the National Biodiversity Network, is considered appropriate.
- 4.172. Under Habitats (paragraph 6.22.6), reference is made to the London and Tower Hamlets BAPs with regard to the brownfield habitat. As requested in our previous review, it is now stated that consideration will be given to whether any or all of the site meets the JNCC definition for the UK priority habitat "Open Mosaic Habitats on Previously Developed Land".
- 4.173. Paragraph 6.23.13 refers to common reptiles. It is worth letting the developer know that we have a 2013 record of a slow worm from very near the site, which will not yet be with GiGL and hence will not show up on the data search.
- 4.174. Paragraph 6.23.15 refers to black redstart and outlines survey methods used for this species. As suggested in the previous review of the Draft EIA Scoping Report, standard bird surveys often miss black redstarts, and the methodology described in best practice guidance (Gilbert et al (1998) and on <http://www.blackredstarts.org.uk>) has been used.
- 4.175. Paragraph 6.23 appears to be incomplete, and therefore it is unclear what point this sentence is trying to make.
- 4.176. The Council is keen to understand the mitigation/ enhancement measures to be employed for the site. These should be discussed in detail with the Council's Biodiversity Officer.

Natural England

- 4.177. Case law and guidance has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Appendix A to Natural England's letter provides advice on the scope of the Environmental Impact Assessment (EIA) for this development – see Appendix B of this EIA Scoping Opinion.
- 4.178. Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be re- consulted.

Review of Section 6.23: TV and Radio (Electronic) Interference

- 4.179. The EIA Scoping Report highlights that the chapter will assess the likely effects of the development on television and gives clear rationale for the need of this assessment. It also states that any potentially adverse effects to existing mobile telephone systems, wireless networks, emergency services, DLR and maritime communications will be assessed. Whilst the scope is generally acceptable, the report has not referred to effects on electromagnetic interference and the effects of providing telecommunication infrastructure to the development, which are recommended assessment topics as per the LBTH Scoping Guidance. It has however, effectively explained why the assessment of effects on radio have been 'scoped' out of the assessment.
- 4.180. The assessment methodology for assessing the effects on television will be undertaken with reference to calculations of how far the terrestrial TV shadow will fall and what properties will be at risk of losing television reception. A site visit will also identify and generate an estimate of numbers of properties potentially adversely affected which will inform the baseline conditions. As in the Draft EIA Scoping Report, the current EIA Scoping Report does not, however, detail the proposed methodology for assessing the effects on mobile telephone systems, wireless networks, emergency services, DLR and maritime communications which are proposed for inclusion in the assessment.
- 4.181. It is recommended that a thorough desk survey is also undertaken to expand on the survey findings, and consultation should be undertaken with key stakeholders including Office of Communications (OfCom) and the Maritime and Coastguard Agency to identify likely effects. Where effects on telecommunications have been predicted reference should be made to the Supporting Guidance to PPG8 Telecommunications (2001), contained in the Appendix to the PPG. The methodology used to calculate effects should be appropriate to the effects predicted, and the receptors affected (for example, particular blocks of flats etc.) should be identified.
- 4.182. Paragraph 6.24.2 states *'The only relevant interference mechanism affecting TV signals is attenuation due to buildings physically blocking (and absorbing) the signals'*. No reference has been made to the introduction of equipment that could disrupt transmissions. This should be considered as appropriate.

Review of Section 6.24: ES Volume II – Townscape, Conservation and Visual Impact Assessment

- 4.183. This section of the EIA Scoping Report has been reviewed by both LBTH and LBH's Conservation and Design Officers, who have provided an analysis of the previously submitted views document which should be referred to in undertaking the assessment.
- 4.184. Currently the EIA Scoping Report has a sub-heading of 'townscape' under the baseline section and 'views' under the potential impacts section. As stated in our review of the Draft EIA Scoping Report, both will be required in both sections.
- 4.185. This section of the ES should comprise two components: assessment of

- landscape/ townscape effects (effects on landscape/ townscape as a resource in its own right); and assessment of visual effects (effects on specific views and on the general visual amenity experienced by people) ref Guidelines for Landscape and Visual Impact Assessment (GLVIA) 3rd Edition 2013 paras 2.21 and 2.22.
- 4.186. The applicant has clarified how this chapter will sit with the 'built heritage' chapter proposed for the ES at para. 6.25.18. Some guidance on links to cultural heritage assessments is provided at paras 5.7-5.11 of GLVIA 3.
- 4.187. It would have been helpful for the EIA Scoping Report to set out how the effects are going to be determined (as advised in the Guidelines for Landscape and Visual Impact Assessment, 2013).
- 4.188. The townscape and visual impact assessment should assess:
- impacts of the development on the physical characteristics of the site (including vegetation loss) and its surroundings and on landscape and townscape character – this should be separate to the visual impact assessment. We note that the applicant plans to divide the study area into townscape areas. Reference should be made to the townscape classifications contained in LBTH's Core Evidence Base: Character Area Assessments (2006) and LBTH's Urban Structure and Characterisation Study (September 2009) to set this assessment in context. London's Natural Signatures: The London Landscape Framework, Prepared for Natural England (January 2011) should also be used to set the landscape character context; and
 - assessment of visual effects – the viewpoints for assessment have been agreed with LBH and LBTH. The assessment of visual effects should include effects on specific views and on the general visual amenity experienced by people and be carried out in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA) 3rd Edition 2013. It will be important to record the receptors which will be affected by these changes.
- 4.189. The assessment will require different methodologies for each assessment (townscape character and visual). Currently, as in the Draft EIA Scoping Report, the EIA Scoping Report sets out one method for both assessments.
- 4.190. Cumulative effects should also be considered and it is noted that the list of relevant proposed schemes included in Table 1 will be agreed with LBTH. The following guidance should also be utilised:
- 'Guidance on Tall Buildings' (CABE/EH, 2007);
 - 'Seeing History in the View' (EH, 2011);
 - 'The Setting of Heritage Assets' (EH, 2012); and
 - London View Management Framework SPG (GLA, 2012)
- 4.191. With respect to paragraph 6.4.2, the 'likely worst case scenario' shown will

only be in terms of scale and massing, not in terms of visual impact as a whole.

- 4.192. With respect to paragraph 6.4.3, it may be appropriate to define what a 'significant' difference is between maximum and minimum building envelopes. Presumably where there is no significant difference it is only the maximum that will be considered – this is not stated explicitly.
- 4.193. With respect to paragraphs 6.25.10 to 6.25.14, the explanation of the proposed methodology is somewhat limited. The EIA is expected to contain a more detailed explanation, which draws on the advice in the guidance documents mentioned above.
- 4.194. With respect to paragraph 6.25.14, the assessment of whether the effects are beneficial, adverse or neutral should be fully justified. This is particularly important if effects are assessed as beneficial. It will not be sufficient to make unsupported claims such as 'the scheme will be of a high quality design'. Specific details of why the scheme is considered high quality and why it is considered to be beneficial to the view will be required.
- 4.195. The 'net-equation' should only take into account positive and negative visual effects. Other positive and negative effects arising from the development as a whole will form part of the overall planning balance for the scheme.
- 4.196. With respect to paragraph 6.25.14, the EIA 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.
- 4.197. All judgements on the significance of effects on townscape character and views should be fully explained and justified and be based on judgements of the potential effects identified, their magnitude and the sensitivity of the receptor affected.

Visual Assessment

- 4.198. The City of London have requested that regard should be had to the impact of the development on the backdrop of St Paul's Cathedral, particularly from viewing points on the South Bank (LVMF view 16B), Waterloo Bridge and Hungerford Bridge.
- 4.199. We note that a number of LVMF viewpoints have been included in the list of viewpoints for assessment. It will be important to ensure that there is clarity about how these views are assessed in the Built Heritage chapter and in this chapter. In one of these chapters the impact on the reasons for designation of these views should be clearly set out, with an assessment of how the proposal relates to the visual management guidance set out in the LVMF. Some viewpoints have been selected to illustrate effects on built heritage features which will be referenced from the Built Heritage chapter.
- 4.200. It is noted that visualisations will be provided, either as fully rendered images or wireline outlines. The views to be illustrated and the type of visualisations for each viewpoint produced should be agreed with LBTH and LBH.

- 4.201. Images should be prepared in accordance with the Landscape Institute's Advice Note 01/11 'Photography and photomontage in landscape and visual impact assessment' and guidance contained in the LVMF SPG for LVMF viewpoints.
- 4.202. The viewpoints should assess the worst case scenario i.e. winter views. The EIA Scoping Report references both rendered and wireline images.

Townscape Assessment

- 4.203. As in the Draft EIA Scoping Report, we note that the Applicant's report states that these Guidelines are better suited to assessing landscape than townscape, and so they can form only a general guide to the method to be used. It should however, be noted that the European Landscape Convention definition of landscape includes seascapes and townscapes (see GLVIA Chapter 2 'Definitions, scope and context'). There is further guidance on townscape assessment at para 5.5 of the GLVIA 3. These guidelines have been specifically drafted to take account of the wider definition landscape, as set out by the European Landscape Convention, and it provides specific guidance on the assessment of townscape impacts.
- 4.204. It would be useful to agree the townscape areas (including their descriptions and sensitivities) before the submission of the EIA.
- 4.205. An assessment of townscape character should be provided, with information regarding the location and sensitivity of the townscape character area in which the proposal lies, and of any other affected character areas (with reference to the characterisation documents cited in the LBTH's EIA Scoping Guidance).

Crossrail

- 4.206. Crossrail Limited do not wish to make any comments on this application as submitted.

Historic Royal Palaces

- 4.207. The Historic Royal Palaces state that given the heritage sensitivity of the site (it is surrounded by four conservation areas, part of the site falls within the scope of the London View Management Framework SPD, there are some 272 listed buildings in the vicinity of the site, as well as two Grade II listed structures on the site, and archaeological remains of interest are likely to exist below ground), rigorous assessment of the impact (both physical and visual) of the proposed development on the historic environment will be essential. Since the substantial quantum of development proposed includes several residential 'towers' of up to 46 storeys high, on a 2-storey podium, the impact on the setting of the Tower of London World Heritage Site (WHS), which lies 1500m directly south of the development site, and on views from the Tower itself, looking north, will need to be considered carefully.
- 4.208. We note that the Tower WHS is identified as a 'potential environmental sensitive receptor' (para 3.1.1, p8) and that views generally will be considered

in detail in a technical assessment chapter on the 'Townscape, Conservation and Visual' impacts of the development (para 6.1.2, p14). The intention specifically to assess the effect on the Tower of London is stated (para 6.22.7, p55) and 5 proposed assessment viewpoints shown on Figure 14: Viewpoint Location Map (63). These appear to be the 3 aspects of LVMF View 25, plus 2 oblique views from Tower Bridge looking north. We would ask that at least one more view should be added, looking north towards the development site from the North Wall Walk of the Tower, which is now accessible to the public. It will be important for the residential towers not to appear in the distance above the general level of the buildings immediately surrounding the Tower.

4.209. We would also ask that Historic Royal Palaces should be added to the list of bodies to be consulted through the EIA and design process, as identified in para 4.1.3.

5. ASSESSMENTS SCOPED OUT OF THE EIA

5.1. Sections 6.26 and 6.27 of the EIA Scoping Report sets out those 'non-significant issues' which the applicant is proposing to exclude from the assessment. The issues proposed to be scoped out of the ES include:

- a) Health and Wellbeing; and
- b) Aviation.

5.2. The justifications for excluding these topics from assessment in the ES are discussed below.

5.3. It would have been helpful to collate the other assessments being scoped out in this section of the EIA Scoping Report for clarity e.g. radio and archaeology (operational).

Health and Wellbeing

5.4. The EIA Scoping Report suggests that health and wellbeing issues are to be addressed through the socio-economic, wind micro-climate, daylight/ sunlight, noise and air quality chapters, as well as within various other documents and assessments submitted in support of the planning application (to which the ES should refer as appropriate). The justification provided for this decision is considered to be acceptable. The quality of environment and related health and well-being benefits to the new residents of the development will be assessed through the application of the Code for Sustainable Homes, with the development aspiring to meet Level 4 of the Code. As stated in the LBTH EIA Scoping Guidance, the cumulative effects of the development on topics related to health and well-being should be covered through the relevant chapters.

Aviation

5.5. The EIA Scoping Report proposes that aviation should not be included in the EIA. The reason given for this is that the maximum height of the development will be significantly below the 1000 ft zone within which the Civil Aviation Authority would object to a planning application.

5.6. The EIA Scoping Report confirms that the CAA and London City Airport will, however, be consulted about the development. The LBTH Scoping Guidance highlights the importance of considering the use of tall structures such as cranes and lighting during the construction process. As such, as raised in our review of the Draft EIA Scoping Report, the applicant should provide more information on how these potential aviation effects arising from the construction phase will be addressed in the ES.

London City Airport

5.7. LCY would encourage the developer of this site to engage with our safeguarding team during the pre-application phase as mentioned within the report.

6. PROPOSED STRUCTURE OF THE ENVIRONMENTAL STATEMENT

- 6.1. With respect to the proposed 'Residual Impact Assessment and Conclusions' chapter, LBTH agrees that it is helpful to provide a summary of the effects identified within the ES. It is requested that the effects both pre- and post-mitigation are shown for clarity i.e. not just residual effects.
- 6.2. In respect to the planning application documentation, it is unclear why a separate Townscape Assessment and Heritage Statement are required in addition to the ES. It is also unclear which documents are to be approved and which are for information purposes only.

7. REFERENCES

British Standards Institute (1999) *BS8233 Sound insulation and noise reduction for buildings. Code of practice*

Building Research Establishment (2011) *Site layout planning for daylight and sunlight: A Guide to Good Practice*

Carroll and Turpin (2009) *Environmental Assessment Handbook*

Communities and Local Government (2012) *National Planning Policy Framework*

English Heritage (2011) *Seeing the History in the View*

Landscape Institute (2011) *Advice Note 01/11 Photography and photomontage in landscape and visual impact assessment*

London Borough of Tower Hamlets (2003) *Air Quality Action Plan*

London Borough of Tower Hamlets (2006) *Core Evidence Base: Character Area Assessments*

London Borough of Tower Hamlets (2009) *Urban Structure and Characterisation Study*

London Borough of Tower Hamlets (2010) *Tower Hamlets Core Strategy*

London Borough of Tower Hamlets (2012) *EIA Scoping Guidance*

London Borough of Tower Hamlets (2013) *Managing Development Document*

London Borough of Tower Hamlets (undated) *Code of Construction Practise*

URS (2014) *EIA Scoping Report*

APPENDIX A: LBTH CONSULTATION LIST

- 1 LBTH consulted both internal and external consultees on the EIA Scoping Report (URS, 2014) requesting their views on the scope of the EIA for the proposed development.
- 2 A list of the internal consultees consulted is provided in Table A.1, and external consultees in Table A.2. The responses received from external consultees are also provided at Appendix C.
- 3 Internal LBTH consultees can be contacted via the relevant department at London Borough of Tower Hamlets through the main switchboard on 020 7364 5000 or through the EIA Officer.

Table A.1: LBTH Internal Consultees

Technical Specialist within LBTH	Response received?
Biodiversity Officer	Y
EIA Officer	Y
Air Quality Officer	Y
Contaminated Land Officer	Y
Environmental Health Officer	Y
Flood Engineer	Y
Heritage and Design Officer	Y
Highways Officer	Y
Public Health Strategist	Y
Waste Officer	Y

Table A.2: LBTH External Consultees

Organisation	Response received?
BBC	N
British Gas	N
BT	N
Canal and River Trust	Y
Council for British Archaeology	N
Crossrail Safeguarding	Y
City of London Corporation	Y
English Heritage (GLAAS)	Y
English Heritage (Built Heritage)	Y
Environment Agency	Y
Greater London Authority	N
Historic Royal Palaces	Y
London Borough of Greenwich	Y
London Borough of Hackney	Y (inherent in this EIA Scoping Opinion)
London Borough of Lewisham	N
London Borough of Newham	N
London Borough of Southwark	Y
London City Airport	Y
London Fire and Emergency Planning Authority	Y
Marine Management Organisation	Y
NATS	N
National Grid	N
Natural England	Y
Port of London Authority	Y
Thames Water	Y
Transport for London	N

APPENDIX B: LBH CONSULTATION LIST

- 1 LBH consulted both internal and external consultees on the EIA Scoping Report (URS, 2014) requesting their views on the scope of the EIA for the proposed development.
- 2 A list of the internal consultees consulted is provided in Table B.1, and external consultees in Table B.2. The responses received from external consultees are also provided at Appendix D.

Table B.1: LBH Internal Consultees

Technical Specialist within LBH	Response received?
Pollution Land and Air	N
Pollution Noise	N
Traffic and Transportation	N
Waste management	N
Conservation, Urban Design and Sustainability	N
Planning Policy and Strategy	N

Table B.2: LBH External Consultees

Organisation	Response received?
English Heritage (GLAAS)	Y
English Heritage (Built Heritage)	N
Environment Agency	Y
City of London Corporation	N
Greater London Authority	N
Network Rail	Y
Thames Water	N
Transport for London	N

APPENDIX C: RESPONSES FROM LBTH EXTERNAL CONSULTEES



Harriet Peacock
London Borough of Tower Hamlets
Building & Technical Services
5, Mulberry Place Clove Crescent
London
E14 2BG

Our ref: NE/2014/119660/01-L01
Your ref: PA/14/00107
Date: 11 February 2014

By email:
harriet.peacock@towerhamlets.gov.uk

Dear Harriet

Bishopsgate Goods Yard, Shoreditch High Street, London.

Request for Scoping Opinion as to the information to be contained within an Environmental Impact Assessment in support of an application for the redevelopment of these sites.

Thank you for your consultation on the above. The EIA scoping report correctly identifies the site to be within Flood Zone 1. As the site is greater than 1 hectare the planning application will need to be accompanied by a Flood Risk Assessment. I have attached our factsheet for advice on FRA requirements on sites greater than 1 hectare.

Please contact me with any further queries relating to the above.

Yours sincerely

Mrs Eleri Randall
Planning Advisor

Direct dial 020 3263 8055
Direct e-mail northlondonplanning@environment-agency.gov.uk



Sites over 1 hectare factsheet

North East Thames area

Produced October 2013 v.1

This factsheet provides information on the requirements for Flood Risk Assessments (FRA) on sites over 1 hectare within North East Thames area, to assist you with producing a satisfactory FRA for your development. It should be read alongside the National Planning Policy Framework and the Environment Agency's general FRA advice (FRA Guidance note 1).

It covers matters relating to flood risk assessments only, and does not outline other considerations we may take into account, (e.g. proximity to a watercourse, contaminated land, biodiversity requirements).

The Environment Agency will assess Flood Risk Assessments for all planning applications over a hectare in size. A local exception to this is when the actual development footprint is 250 square metres or less, when we will pass the assessment over to the Local Planning Authority (LPA).

A surface water strategy should be carried out to demonstrate that the proposed development will not create an increased risk of flooding from surface water. It should be carried out in accordance with the National Planning Policy Framework and the Practice Guide, giving preference to infiltration over discharge to a watercourse, which in turn is preferable to discharge to surface water sewer. Guidance on the preparation of surface water strategies can be found in the Defra/Environment Agency R&D Technical Report W5-074/A/TR/1 Revision E "Preliminary rainfall runoff management for developments".

We recommend that the FRA demonstrates the following (1-4) as a minimum:

1. Runoff rates

Peak discharge rates from site will not increase as a result of the proposed development, up to a 1 in 100 chance in any year including an allowance for climate change storm event. We encourage all applicants to strive to achieve greenfield runoff rates to reduce the impact of the development on the surface water drainage infrastructure, unless it is demonstrated that this is not practicable

2. Storage volumes

Storage volumes for all events up to a 1 in 100 chance in any year including an allowance for climate change storm event can be provided on site.

The site will not flood from surface water up to a 1 in 100 year chance in any year including an allowance for climate change event, OR surface water flooding will be safely contained on site up to this event, ensuring that surface water runoff will not increase flood risk to the development or third parties.


3. Sustainable drainage techniques

Sustainable Drainage Systems (SuDS) such as green roofs, ponds, swales and permeable pavements will be used.

SuDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SuDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge and biodiversity benefits, as well as improving water quality and amenity value.

The SuDS hierarchy should be followed as you design the site. The methods at the top of the hierarchy are preferred because they are beneficial in terms of sustainability and biodiversity. The hierarchy should be used in descending order, with any obstacles to the use of SuDS methods clearly justified.

SuDS Hierarchy

	SuDS technique	Flood reduction	Pollution reduction	Landscape and wildlife benefit
Most Sustainable  Least sustainable	Living roofs and walls	✓	✓	✓
	Basins and ponds	✓	✓	✓
	Filter strips and swales	✓	✓	✓
	Infiltration devices	✓	✓	✓
	Permeable surfaces and filter drains	✓	✓	
	Tanked and piped systems	✓		

A site's drainage design can be made up of a range of SuDS techniques. The variety of SuDS techniques available means that any development should be able to include a scheme based around these principles. These should be explored early on in the design of any development, to ensure they are an integral part of the site layout. Further information on SuDS can be found in:

- CIRIA C522 Sustainable Drainage Systems – design manual for England and Wales
- CIRIA C697 SuDS manual
- CIRIA C609 SuDS management train
- The Interim Code of Practice for Sustainable Drainage Systems.

4. Residual Risk

The residual risk of flooding can be managed and contained safely on site should any drainage features fail (e.g. pumps or hydrobrakes) OR during an extreme storm event. The location and depth and flow routes of any overground flooding should be clearly shown on a plan.

5. Climate change allowances

Guidance on climate change allowances can be found within the National Planning Policy Framework Technical Guidance.

6. Infiltration rates

Infiltration rates should be worked out in accordance with BRE 365. If it is not feasible to access the site to carry out soakage tests before planning approval is granted, a desktop study could be undertaken looking at the underlying geology of the area and assuming a worst-case infiltration rate for that site.

Local policies and recommendations

You should, as part of the surface water strategy, demonstrate to the LPA that the requirements of any local surface water drainage planning policies have been met and the recommendations of the relevant Strategic Flood Risk Assessment and Surface Water Management Plan have been considered.

Further Information

We cannot prepare or provide FRAs. Our Customers and Engagement Team can provide any relevant flooding information that we have available for you to use. There may be a charge for this information. Please email: NETenquiries@environment-agency.gov.uk, or telephone 03708 506 506 and ask for the North East Thames Customers and Engagement team. For further information on our flood map products please visit our website at: www.environment-agency.gov.uk/research/planning/93498.aspx

customer service line
03708 506 506
www.environment-agency.gov.uk

incident hotline
0800 80 70 60

floodline
0845 988 1188



ENGLISH HERITAGE
LONDON OFFICE

Mrs Harriet Peacock
Tower Hamlets Council
Town Hall Mulberry Place
5 Clove Crescent
E14 2BG

Direct Dial: 0207 973 3777
Direct Fax: 0207 973 3792

Our ref: W: PA00277349

12 March 2014

Dear Mrs Peacock

Request for Pre-application Advice: Scoping Opinion

BISHOPSGATE GOODS YARD, SHOREDITCH HIGH STREET, LONDON


Thank you for your consultation of 24 January 2014 seeking our pre-application advice on plans for the above site. On the basis of the information provided, detailed below, it appears that the plans are likely to lead to an application for which English Heritage would be a statutory consultee. On the basis of the current submission, we have no comments to make in regards to the submitted scoping opinion documents. Please note that we are still actively engaged in pre-application discussions regarding the proposals on the site and their impact on the historic environment.

It is important that the local planning authority is invited to give pre-application advice. Relevant amenity societies may also be able to assist and we recommend that you approach them. If there are material changes to the Scoping Opinion documents in respect to the impact on the historic environment, please consult us again. Meanwhile, please contact me if you would like to discuss any matter further.

Yours sincerely

Claire Brady
Inspector of Historic Buildings and Areas
E-mail: claire.brady@english-heritage.org.uk

LBTH: RECEIVED
17 MAR 2014
Development Control

	1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST Telephone 020 7973 3000 Facsimile 020 7973 3001 www.english-heritage.org.uk
	<p>English Heritage is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.</p> <p>English Heritage will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.</p>

LONDON OFFICE

BISHOPSGATE GOODS YARD, SHOREDITCH HIGH STREET, LONDON
Request for Pre-Application Advice

Information Provided
EIA Scoping Opinion report

Date: 06 February 2014
Our ref: 110599
Your ref: PA/14/00107



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Harriet Peacock
Hackney Borough Council
1 Hillman Street
E8 1DY

BY EMAIL ONLY

Dear Ms Peacock,

Environmental Impact Assessment Scoping consultation (Regulation 15 (3) (i) of the EIA Regulations 2011): Proposal: Request for Scoping Opinion as to the information to be contained within an Environmental Impact Assessment in support of an application for the redevelopment of these sites.

Location: Bishopsgate Goods Yard, Shoreditch High Street, London

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 01 January 2014.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law¹ and guidance² has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Appendix A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Sally Harries on 0300 060 2933. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours Sincerely

Sally Harries
Land Use Services

	1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST Telephone 020 7973 3000 Facsimile 020 7973 3001 www.english-heritage.org.uk	
<small>English Heritage is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies. English Heritage will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.</small>		

¹ Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)
² *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from <http://webarchive.nationalarchives.gov.uk/+http://www.communities.gov.uk/planningandbuilding/planning/sustainableenvironmental/environmentalimpactassessment/noteenvironmental/>



Natural England is accredited to the Cabinet Office Service Excellence Standard

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Institute of Ecology and Environmental Management (IEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.118 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Regionally and Locally Important Sites

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are

identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of borough or metropolitan importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures.

2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2010

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, invertebrates and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted standing advice for protected species which includes links to guidance on survey and mitigation.

2.3 Habitats and Species of Principal Importance

The applicant's Scoping report provided appears to have identified the species to survey; we welcome the inclusion of the Black Redstart, a London BAP species. Details of the London BAP include priority habitats as well as species, which could be created or enhanced in this site.

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication 'Guidance for Local Authorities on Implementing the Biodiversity Duty'.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (eg from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (eg whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;

- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

2.6 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

3. Designated Landscapes and Landscape Character

Landscape and visual impacts

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

The EIA should include a full assessment of the potential impacts of the development on local landscape character and significant views using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

4. Access and Recreation

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

The site is included in the All London Green Grid Area Framework 12 and attention should be paid to suggested connections to Allen Gardens for example.

5. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

6. Climate Change Adaptation

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 109), which should be demonstrated through the ES.

In this type of development living roofs and walls, rain gardens and SUDs can make a major contribution both to the quality and sustainability of a place for people as well as potentially providing habitat and foraging areas to support biodiversity.

7. Contribution to local environmental initiatives and priorities

As mentioned above this site is included with The All London Green Grid Area Framework 12 and could deliver well designed, high quality green infrastructure connecting into the wider network. The economic benefits of green infrastructure should not be underestimated and provides health and well-being benefits as well as wider contribution to ecosystem services. The study, ['Green Infrastructure's contribution to economic growth: a review'](#), shows how investment in GI encourages inward investment and can attract increased visitor spending at a local level. It can also aid national economic growth by reducing flood risk, improving air quality and providing health benefits.

8. Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have

been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. on-going activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, ie projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Harriet Peacock

Subject: FW: PA/14/00107 : Bishopsgate Goods Yard, Shoreditch High Street, London

Dear Harriet,

Please can you inform the applicant that they may require a licence under the Marine and Coastal Access Act (2009).

Therefore please can they submit a licence enquiry via the Marine Licensing web portal below so we can inform them to whether a marine licence is required or not. The licence enquiry link is on the left hand side of the webpage.

https://marinelicensing.marinemanagement.org.uk/mmo/fox/live/MMO_LOGIN/login

Kind Regards,

Usman Majid
Marine Licensing Support
Marine Management Organisation
Lancaster House
Hampshire Court
Newcastle Business Park
Newcastle Upon Tyne
NE4 7YH

Harriet Peacock

From: Emma Worby <Emma.Worby@londoncityairport.com>
Sent: 29 January 2014 16:36
To: Harriet Peacock
Subject: PA/14/00107

Dear Harriet,

Thank you for consulting London City Airport (LCY) on the scoping opinion application PA/14/00103.

After looking at the scoping report, LCY would encourage the developer of this site to engage with our safeguarding team during the pre-application phase as mentioned within the report.

Kind regards

Emma

Emma Worby
Technical Operations Coordinator

Phone: 0203 203 2523

Mobile: 0784 186 5334

Email: Emma.Worby@londoncityairport.com

Website: www.londoncityairport.com


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Harriet Peacock

Subject: FW: PA/14/00107 : Bishopsgate Goods Yard, Shoreditch High Street, London

Dear Sirs

Ref. PA/14/00107: Bishopsgate Goods Yard, Shoreditch High Street, London

Thank you for notifying Historic Royal Palaces of this request for a Scoping Opinion relating to an Environmental Impact Assessment (EIA) being prepared in support of a hybrid application (part outline and part detailed) for the redevelopment of this site.

Given the heritage sensitivity of the site (it is surrounded by four conservation areas, part of the site falls within the scope of the London View Management Framework SPD, there are some 272 listed buildings in the vicinity of the site, as well as two grade II listed structures on the site, and archaeological remains of interest are likely to exist below ground), rigorous assessment of the impact (both physical and visual) of the proposed development on the historic environment will be essential. Since the substantial quantum of development proposed includes several residential 'towers' of up to 46 storeys high, on a 2-storey podium, the impact on the setting of the Tower of London World Heritage Site (WHS), which lies 1500m directly south of the development site, and on views from the Tower itself, looking north, will need to be considered carefully.

We note that the Tower WHS is identified as a 'potential environmental sensitive receptor' (para 3.1.1, p8) and that views generally will be considered in detail in a technical assessment chapter on the 'Townscape, Conservation and Visual' impacts of the development (para 6.1.2, p14). The intention specifically to assess the effect on the Tower of London is stated (para 6.22.7, p55) and 5 proposed assessment viewpoints shown on Figure 14: Viewpoint Location Map (63). These appear to be the 3 aspects of LVMF View 25, plus 2 oblique views from Tower Bridge looking north. We would ask that at least one more view should be added, looking north towards the development site from the north Wall Walk of the Tower, which is now accessible to the public. It will be important for the residential towers not to appear in the distance above the general level of the buildings immediately surrounding the Tower.

We would also ask that Historic Royal Palaces should be added to the list of bodies to be consulted through the EIA and design process, as identified in para 4.1.3.

I am copying this response to Mike Dunn at English Heritage, for information.

Regards

Anna McPherson
For Historic Royal Palaces.

Anna McPherson DipArch RIBA IHBC FRSA
Partner
Drury McPherson Partnership
114 Shacklegate Lane
Teddington
TW11 8SH
tel: 020 8977 8980
fax: 020 8977 8990

www.dmpartnership.com

Jacob Jaarsma
020 8921 5438
020 8921 5442

jacob.jaarsma@royalgreenwich.gov.uk

Ms Harriet Peacock
Tower Hamlets Council
Development & Renewal
Town Hall, Mulberry Place
5th Floor, Anchorage House
PO Box 55739, 5 Clove Crescent, London
E14 9YQ

14/0186/K

26 February 2014

DECISION NOTICE - RAISE NO OBJECTION

Dear Ms Peacock,

Town & Country Planning Act 1990 (As Amended)
Town & Country Planning (General Permitted Development) Order 1995 (As Amended)

Site: Bishopsgate Goods Yard, Shoreditch High Street, London
Applicant: Bishopsgate Goods Yard Regeneration Limited
Proposal: Scoping Opinion for the redevelopment of these sites.
Drawing No's: Cover Letter and email dated 23.1.2014.

I refer to your letter dated 23 January 2014 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and raises no objections.

Although the Council raises no objection to the information contained in the initial Scoping Opinion, the Royal Borough of Greenwich would like to be formally notified of any future planning application to develop the site.

Thank you for consulting me on this matter.

Yours faithfully



Assistant Director



Directorate of Regeneration,
Enterprise & Skills
Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

TJ1



ENGLISH HERITAGE

Ms Harriet Peacock
London Borough of Tower Hamlets
Town Hall, Mulberry Place
5 Clove Crescent
E14 2BG

Your Ref: PA/14/00107

Our Ref: CLO12980
LAG 30/662

Contact: Julie Patenaude
Direct Dial: 020 7973 3726
Email: Julie.patenaude@english-heritage.org.uk

13 February 2014

Dear Ms Peacock,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2012

Bishopsgate Goods Yard, Shoreditch High Street

Request for Scoping Opinion as to the information to be contained within an Environmental Impact Assessment in support of an application for the redevelopment of these sites.

Recommend archaeological assessment to be contained within an Environmental Impact Assessment

Thank you for your consultation received on 23 January 2014.

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.

The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should be required to submit appropriate desk-based assessments, and where necessary undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision. This information should be supplied to inform the planning decision.

Appraisal of this proposal using the Greater London Historic Environment Record and information provided indicates a need for further information to reach an informed judgment of its impact on heritage assets of archaeological interest.

1 WATERHOUSE SQUARE, 138 - 142 HOLBORN, LONDON, EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001

www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available



The site is located within the Hackney South Shoreditch Archaeological Priority Area which has a high potential to contain archaeological remains from the Roman, Medieval, and Post-Medieval periods. Previous investigations undertaken by MOLA on the northern half of the site have uncovered evidence from each period including evidence of agricultural uses and urbanisation. The application will also affect designated and undesignated heritage assets of railway archaeological interest forming part of the world's first operational passenger railways – The Eastern Counties Railway of c. 1840.

In addition to the assessments proposed in this scoping opinion, I recommend that the Environmental Impact Assessment (EIA) considers other relevant forms of reduction of harm to the designated and undesignated heritage assets as potential mitigation strategies. The EIA should also explore the potential to enhance or make a positive contribution towards these assets through effective building design.

The nature and scope of assessment and evaluation should be agreed with GLAAS and carried out by a developer-appointed archaeological practice before any decision on the planning application is taken. The ensuing archaeological report will need to establish the significance of the site and the impact of the proposed development.

Once the archaeological impact of the proposal has been defined, GLAAS can discuss mitigation options and make recommendations to the local planning authority. The NPPF accords great weight to the conservation of designated heritage assets and also non-designated heritage assets of equivalent interest. Heritage assets of local or regional significance may also be considered worthy of conservation. If archaeological safeguards do prove necessary, these could involve design measures to preserve remains in situ or where that is not feasible archaeological investigation prior to development.

Further information on archaeology and planning in Greater London is available at: <http://www.english-heritage.org.uk/professional/advice/our-planning-role/greater-london-archaeology-advisory-service/about-glaas/>

Please note that this advice relates solely to archaeological considerations and is without prejudice to the local authority's decision-making role. If necessary, English Heritage's Development Management or Historic Places teams should be consulted separately regarding statutory matters.

Yours sincerely

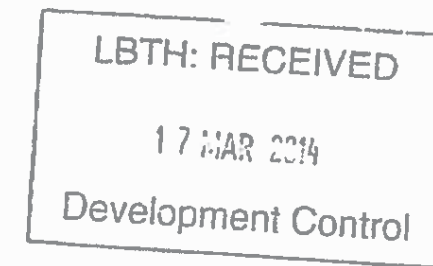


Julie Patenaude
Archaeology Advisor
Greater London Archaeological Advisory Service
National Planning and Conservation: London

1 WATERHOUSE SQUARE, 138 – 142 HOLBORN, LONDON, EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001
www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.
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Harriet Peacock
Development and Renewal,
Planning Department
Mulberry Place (AH)
Clove Crescent
London
E14 2BG

Dear Ms. Peacock

FIRE AUTHORITY CONSULTATION

Premises: Bishopsgate Goods Yard, Shoreditch High Street, London

With reference to your email dated 23 January 2014, requesting observations on the above stated development, the Fire Authority wish to respond as follows.

With regards to Town & Country Planning, the Fire Authority needs to consider Access and Water Supplies, which is covered by Approved Document B (B5, Section 15, 16 & 17) and British Standard 9990. The Town & Country Portal has been researched, and no information directly related to Fire Service Access & Water Supplies has been provided. As such I am unable to make meaningful observations.

It has been my experience that with developments of this size, unless brigade access and water supplies are considered at an early stage, it can make for serious problems at the latter stages of the development. This being the case the Fire Authority strongly recommends that the said information is made available to the Fire Authority at the earliest opportunity.

If there any specific fire safety matters about which you are concerned or have any queries regarding this letter, please contact the person named below. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

Yours sincerely,



for Assistant Commissioner (Fire Safety Regulation)
Deputy Commissioner's Directorate
FSRNorth@london-fire.gov.uk

Reply to Tracey Beardall
Direct T 0208 555 1200 Ext.56950

Harriet Peacock

From: Will Orlik <WillOrlik@crossrail.co.uk> on behalf of Safeguarding <Safeguarding@crossrail.co.uk>
Sent: 23 January 2014 12:20
To: Harriet Peacock
Subject: PA/14/00107 Bishopsgate Goods Yard, Shoreditch High Street, London

Crossrail Ref: CRL-00-115790

Dear Harriet Peacock,

PA/14/00107 : Bishopsgate Goods Yard, Shoreditch High Street, London

Thank you for your letter dated 23 January 2014 and the accompanying planning application documents relating to the above site, requesting the views of Crossrail Limited on the above application.

Crossrail is a proposed new railway that will link Heathrow and Maidenhead in the west to Shenfield and Abbey Wood in the east using existing Network Rail tracks and new tunnels under Central London.

The Crossrail Bill which was introduced into Parliament by the Secretary of State for Transport in February 2005 was enacted as the Crossrail Act on the 22nd July 2008. The first stage of Crossrail preparatory construction works began in early 2009. Main construction works have started with works to the central tunnel section to finish in 2018, to be followed by a phased opening of services.

Crossrail Limited administers a Direction issued by the Department for Transport on 24th January 2008 for the safeguarding of the proposed alignment of Crossrail.

The site of this planning application is identified outside the limits of land subject to consultation under the Safeguarding Direction.

The implications of the Crossrail proposals for the application have been considered and I write to inform you that Crossrail Limited do not wish to make any comments on this application as submitted.

You may inspect and/or purchase copies of Plans, Sections, Environmental Statements, Explanatory Notes and Non-Technical Summaries pertaining to the Crossrail proposals at specified Libraries, Local Authority Offices or directly from Crossrail Limited at "28th Floor, 25 Canada Square, Canary Wharf, London E14 5LQ".

In addition, the latest project developments can be found on the Crossrail website www.crossrail.co.uk/safeguarding, which is updated on a regular basis.

I hope this information is helpful, but if you require any further assistance then please feel free to contact a member of the Safeguarding Team on 0345 602 3813, or by email to safeguarding@crossrail.co.uk

Yours sincerely,

Will Orlik | Safeguarding Coordinator
Crossrail Limited | 25 Canada Square | London | E14 5LQ
Tel: 020 3229 9100 | Helpdesk (24hr) 0345 602 3813

Desk Location CS28/B5/04
T 020 3229 9207
willorlik@crossrail.co.uk
www.crossrail.co.uk

MOVING LONDON FORWARD

Department of the Built Environment
Philip Everett, BSc, CEng, MICE
Director of the Built Environment

Harriet Peacock
London Borough of Tower Hamlets
Planning and Building Control
Mulberry Place (AH)
PO Box 55739
5 Clove Crescent
London E14 2BG

Dear Madam,

Bishopsgate Goods Yard, Shoreditch High Street, London.

Request for scoping opinion as to the information to be contained within an Environmental Impact Assessment in support of an application for the redevelopment of the site.

I refer to your email dated 23 January 2014 regarding the above proposal.

The EIA scoping report for Bishopsgate Goods Yard includes assessment of the range of issues expected for this type of development.

Section 6.25 *ES volume II – Townscape, Conservation and Visual Impact Assessment* does not include reference to the St Paul's Heights policy which aims to protect and enhance local views of St Paul's Cathedral and its setting and backdrop. Paragraph 6.25.5 should include reference to the City of London's St Paul's Heights policy. Regard should be had to the impact of the development on the backdrop of St Paul's Cathedral particularly from viewing points on the South Bank (LVMF view 16B), Waterloo Bridge and Hungerford Bridge. Further details of this policy can be found in the City of London Protected Views Supplementary Planning Document:

<http://www.cityoflondon.gov.uk/services/environment-and-planning/planning/heritage-and-design/Documents/protected-views-spd-january-2012.pdf>

Table 1 and Figure 7 give details of the locations of other development schemes which could contribute to cumulative impacts in conjunction with the Bishopsgate Goods Yard Scheme. This table and figure do not fully represent the number of schemes in the City that we would expect to be included in the assessment of cumulative impacts. The following sites should be added to table 1 and be represented on figure 7 and included in the assessment of cumulative effects:

City of London PO Box 270, Guildhall, London EC2P 2EJ
Switchboard 020 7606 3030
www.cityoflondon.gov.uk
www.cityoflondon.gov.uk/lordmayor



Telephone 020 7332 1756
Fax 020 7332 1806
Email michael.blamires@cityoflondon.gov.uk

Your ref PA/14/00103
Our ref TH0301

Case Officer
Michael Blamires

Date 13 February 2014

LBTH: RECEIVED

28 FEB 2014

Development Control

10/00371/FULMAJ	Mitre Square, International House, Duke's Place, 11 Mitre Street & 1 Mitre Square, London, EC3	Permitted Not Commenced - Demolished	2016/17
11/00297/OUTL	Tenter House, 45 Moorfields, London, EC2Y 9AE	Permitted Not Commenced - Occupied	2019/20
11/00773/FULEIA	101 Moorgate, London, EC1	Under Construction	2017/18
12/00309/FULL	15 Bishopsgate, London, EC2N 3NW	Permitted Not Commenced - Occupied	2019/20
12/00431/FULL	Broadgate Circle & 3 Broadgate, London, EC2M 2QS	Permitted Not Commenced - Demolished	2016/17

The proposed buildings would be tall enough to be prominent new landmarks in the areas east of and within the eastern parts of the City and may also be of sufficient height to feature in other well-known views. The EIA should demonstrate the impact on local views.

I would be grateful if the above information could be included in the Scoping Opinion.

Yours faithfully

WH
Mrs Annie Hampson
Planning Services Development Director

Harriet Peacock

From: Owen, Lucy <lucy.owen@pla.co.uk>
Sent: 28 January 2014 09:15
To: Harriet Peacock
Subject: PA/14/00107 - Bishopsgate Goods Yard

Harriet

Thank you for your email received on 23 January 2014 concerning the above request for a scoping opinion. The PLA has no comments to make.

Regards
Lucy

Lucy Owen
Planning Officer
Port of London Authority

London River House, Royal Pier Road
Gravesend, Kent, DA12 2BG
Tel: 01474 562384
Mob: 07738 028540
www.pla.co.uk

website: www.pla.co.uk

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Any views or opinions presented are those of the author and do not necessarily represent those of PLA.

Harriet Peacock

Subject: FW: PA/14/00107 : Bishopsgate Goods Yard, Shoreditch High Street, London

Dear Harriet Peacock

In 2011 British Waterways advised Local Planning Authorities of changes to the notified area applicable to consultations with us, in our capacity as a Statutory Consultee. British Waterways introduced a notified area for household and minor scale development and a notified area for EIA and major scale development. The British Waterways Board (Transfer of Functions) Order 2012 has substituted references to British Waterways in the Town and Country Planning (Development Management Procedure) (England) Order 2010 to the Canal & River Trust. As such, local planning authorities are now required to consult the Canal & River Trust on applications for planning permission in the same way as British Waterways were previously consulted.

This application falls outside the notified area for its application scale. We are therefore returning this application to you as there is no requirement for you to consult us in our capacity as a Statutory Consultee.

We are happy to comment on particular applications that fall outside the new notified areas if you would like the Canal & River Trusts comments in specific cases, but this would be outside the statutory consultation regime and this must be made clear to us in any notification letter you send. The document Development Management and British Waterways, issued to all LPAs with the changes to the notified areas, highlights some areas where specific cases may occur. This and further information on Planning and the Canal & River Trust can be found at:

www.canalrivertrust.org.uk Should you require any further information regarding the changes to the notified areas or have a query in relation to consultation or notification of the Canal & River Trust on planning applications, please email us at planning@canalrivertrust.org.uk

Regards,

Wendy Rowland
Planning Database Administrator
Canal & River Trust Peels Wharf Lichfield St Fazeley Tamworth Staffs B78 3QZ
Tel: 01827 252057 (Ext 3357)

e-mail: wendy.rowland@canalrivertrust.org.uk



HP

Chief executive's department
Planning division
Development management (5th floor - hub 2)
PO Box 64529
LONDON SE1P 5LX

Your Ref:
Our Ref: 14/OB/0004
Contact: Michael Glasgow
Telephone: 020 7525 1249
E-Mail: planning.applications@southwark.gov.uk
Web Site: <http://www.southwark.gov.uk>

Date: 14/02/2014

London Borough of Tower Hamlets
Development and Renewal Town Planning
Mulberry Place (AH) Anchorage House
PO Box 55739
5 Clove Crescent
E14 1BY

Dear Development Control Manager

TOWN & COUNTRY PLANNING ACT 1990 (as amended)
REQUEST FOR FORMAL OBSERVATIONS ON A PROPOSAL

Re: BISHOPSGATE GOODS YARD, SHOREDITCH HIGH STREET, LONDON

I refer to the above development proposal on which you have sought the Council's observations. The attached notice sets out the Council's formal response.

Yours sincerely

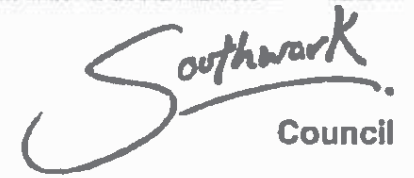
Gary Rice
Head of Development Management



TP(Obs. Adj. Borough)

SOUTHWARK COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)



www.southwark.gov.uk

FORMAL COMMENTS TO ADJOINING BOROUGH

Applicant London Borough of Tower Hamlets
Date of Issue of this decision 14/02/2014

LBS Registered Number 14/OB/0004

With reference to your consultation on the following development:

Request for Scoping Opinion as to the information to be contained within an Environmental Impact assessment in support of an application for the redevelopment of these sites.

At: BISHOPSGATE GOODS YARD, SHOREDITCH HIGH STREET, LONDON

In accordance with your letter received on 23/01/2014 Your Ref. No.:

and Applicant's Drawing Nos. Bishopsgate Goods Yard EIA Scoping Report (URS, Jan 2014)

The Council's formal response is

No formal objection is raised to the proposed development but the Council wishes to make the following comment[s]:

1. Given the location of the site within a designated Strategic View, we would request that a full views impact assessment be undertaken, including fully rendered views, to identify and analyse any impacts on the protected view

Signed *Gary Rice*

Head of Development Management

Your attention is drawn to the notes accompanying this document

Any enquiries regarding this document should quote the LBS Registered Number and be sent to the Head of Development Management, Southwark Council, Chief executive's department, Planning division, Development management, PO Box 64529, London SE1 5LX, or by email to planning.applications@southwark.gov.uk

UPRN:

TP/2014/OBS/TOW

Harriet Peacock

From: Sonya Baird <Sonya.Baird@thameswater.co.uk>
Sent: 03 February 2014 16:52
To: Harriet Peacock
Cc: Devcon Team
Subject: Tower Hamlets - Bishopsgate Goods Yard

Dear Harriet

Thank you for giving Thames Water the opportunity to comment on the above document. The provision of water and waste water infrastructure is essential to any development.

While Thames Water accepts that paragraph 6.11 covers demolition and construction, paragraph 6.19 covers noise and vibration and paragraph 6.20 covers water resources, drainage and flood risk we would make the following observations.

It is unclear at this stage what the net increase in demand on our infrastructure will be as a result of the proposed development. Thames Water is concerned that the network in this area may be unable to support the demand anticipated from this development. The developer needs to consider the net increase in water and waste water demand to serve the development and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.

It is also unclear as to how the building will be constructed, Thames Water is concerned that water mains and sewers immediately adjacent to the site may be affected by vibration as a result of piling, possibly leading to water main bursts and or sewer collapses.

We would therefore recommend that any EIA report should be expanded to consider the following.

- The developments demand for water supply and network infrastructure both on and off site and can it be met
- The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met
- Any piling methodology and will it adversely affect neighbouring utility services.

Should the developer wish to obtain information on the above issues they should contact our Developer Services department on 0845 850 2777

Yours Sincerely

Sonya Baird
Development Planner
Development Planning
Thames Water Utilities Ltd
Maple Lodge Denham Way
Rickmansworth, WD3 9SQ

Telex: 020 3577 8072
Internal ext: 88072

http://corporate/dts/Pn_DevPlan/DevPlanDetails.asp?selDevPlan=3186

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APPENDIX D: RESPONSES FROM LBH EXTERNAL CONSULTEES



ENGLISH HERITAGE

Mr Russell Smith
London Borough of Hackney
2 Hillman Street
London
E8 1FB

Your Ref: 2014/0249

Our Ref: CLO12980
LAG 30/662

Contact: Julie Patenaude
Direct Dial: 020 7973 3726
Email: Julie.patenaude@english-heritage.org.uk

18 March 2014

Dear Mr Smith,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2012**

Land at Bishopsgate Goods Yard, Bethnal Green Road, London E1 6GY

Request for Scoping Opinion regarding the scope of the Environmental Impact Assessment to be undertaken in relation to the mixed use redevelopment of the site.

Recommend archaeological assessment to be contained within an Environmental Impact Assessment

Thank you for your consultation received on 21 February 2014.

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.

The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should be required to submit appropriate desk-based assessments, and where necessary undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision. This information should be supplied to inform the planning decision.

Appraisal of this proposal using the Greater London Historic Environment Record and information provided indicates a need for further information to reach an informed judgment of its impact on heritage assets of archaeological interest.

1 WATERHOUSE SQUARE, 138 – 142 HOLBORN, LONDON, EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001
www.english-heritage.org.uk

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Correspondence or information which you send us may therefore become publicly available



The site is located within the Hackney South Shoreditch Archaeological Priority Area which has a high potential to contain archaeological remains from the Roman, Medieval, and Post-Medieval periods. Previous investigations undertaken by MOLA on the northern half of the site have uncovered evidence from each period including evidence of agricultural uses and urbanisation. The application will also affect designated and undesignated heritage assets of railway archaeological interest forming part of the world's first operational passenger railways – The Eastern Counties Railway of c. 1840.

In addition to the assessments proposed in this scoping opinion, I recommend that the Environmental Impact Assessment (EIA) considers other relevant forms of reduction of harm to the designated and undesignated heritage assets as potential mitigation strategies. The EIA should also explore the potential to enhance or make a positive contribution towards these assets through effective building design.

The nature and scope of assessment and evaluation should be agreed with GLAAS and carried out by a developer-appointed archaeological practice before any decision on the planning application is taken. The ensuing archaeological report will need to establish the significance of the site and the impact of the proposed development.

Once the archaeological impact of the proposal has been defined, GLAAS can discuss mitigation options and make recommendations to the local planning authority. The NPPF accords great weight to the conservation of designated heritage assets and also non-designated heritage assets of equivalent interest. Heritage assets of local or regional significance may also be considered worthy of conservation. If archaeological safeguards do prove necessary, these could involve design measures to preserve remains in situ or where that is not feasible archaeological investigation prior to development.

Further information on archaeology and planning in Greater London is available at:
<http://www.english-heritage.org.uk/professional/advice/our-planning-role/greater-london-archaeology-advisory-service/about-glaas/>

Please note that this advice relates solely to archaeological considerations and is without prejudice to the local authority's decision-making role. If necessary, English Heritage's Development Management or Historic Places teams should be consulted separately regarding statutory matters.

Yours sincerely

Julie Patenaude
Archaeology Advisor
Greater London Archaeological Advisory Service
National Planning and Conservation: London

1 WATERHOUSE SQUARE, 138 – 142 HOLBORN, LONDON, EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001
www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available



creating a better place



Mr Russell Smith
London Borough of Hackney

Russell.smith@hackney.gov.uk

Our ref: NE/2014/119942/01-L01
Your ref: 2014/0249

Date: 7 March 2014

Dear Mr Smith

Request for scoping opinion regarding the scope of the Environmental Impact Assessment to be undertaken in relation to the mixed use redevelopment of the site.

Bishopsgate Goods Yard, Shoreditch High Street, London.

Thank you for your consultation on the above. The EIA scoping report correctly identifies the site to be within Flood Zone 1 and as the site is greater than 1 hectare the planning application will need to be accompanied by a Flood Risk Assessment (FRA). I have attached our factsheet for advice on FRA requirements on sites greater than 1 hectare.

Please contact me with any further queries relating to the above.

Yours sincerely

Mr Andy Goymer
Planning Advisor

Telephone: 020 3263 8054
E-mail: northlondonplanning@environment-agency.gov.uk
Address: Environment Agency, Ergon House, Horseferry Road, London SW1P 2AL

End



UNCLASSIFIED



Sites over 1 hectare factsheet

North East Thames area

Produced October 2013 v.1

This factsheet provides information on the requirements for Flood Risk Assessments (FRA) on sites over 1 hectare within North East Thames area, to assist you with producing a satisfactory FRA for your development. It should be read alongside the National Planning Policy Framework and the Environment Agency's general FRA advice (FRA Guidance note 1).

It covers matters relating to flood risk assessments only, and does not outline other considerations we may take into account, (e.g. proximity to a watercourse, contaminated land, biodiversity requirements).

The Environment Agency will assess Flood Risk Assessments for all planning applications over a hectare in size. A local exception to this is when the actual development footprint is 250 square metres or less, when we will pass the assessment over to the Local Planning Authority (LPA).

A surface water strategy should be carried out to demonstrate that the proposed development will not create an increased risk of flooding from surface water. It should be carried out in accordance with the National Planning Policy Framework and the Practice Guide, giving preference to infiltration over discharge to a watercourse, which in turn is preferable to discharge to surface water sewer. Guidance on the preparation of surface water strategies can be found in the Defra/Environment Agency R&D Technical Report W5-074/A/TR/1 Revision E "Preliminary rainfall runoff management for developments".

We recommend that the FRA demonstrates the following (1-4) as a minimum:

1. Runoff rates

Peak discharge rates from site will not increase as a result of the proposed development, up to a 1 in 100 chance in any year including an allowance for climate change storm event. We encourage all applicants to strive to achieve greenfield runoff rates to reduce the impact of the development on the surface water drainage infrastructure, unless it is demonstrated that this is not practicable

2. Storage volumes

Storage volumes for all events up to a 1 in 100 chance in any year including an allowance for climate change storm event can be provided on site.

The site will not flood from surface water up to a 1 in 100 year chance in any year including an allowance for climate change event, OR surface water flooding will be safely contained on site up to this event, ensuring that surface water runoff will not increase flood risk to the development or third parties.

3. Sustainable drainage techniques

Sustainable Drainage Systems (SuDS) such as green roofs, ponds, swales and permeable pavements will be used.

SuDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SuDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge and biodiversity benefits, as well as improving water quality and amenity value.


The SuDS hierarchy should be followed as you design the site. The methods at the top of the hierarchy are preferred because they are beneficial in terms of sustainability and biodiversity. The hierarchy should be used in descending order, with any obstacles to the use of SuDS methods clearly justified.

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SuDS Hierarchy

	SuDS technique	Flood reduction	Pollution reduction	Landscape and wildlife benefit
Most Sustainable  Least sustainable	Living roofs and walls	✓	✓	✓
	Basins and ponds	✓	✓	✓
	Filter strips and swales	✓	✓	✓
	Infiltration devices	✓	✓	✓
	Permeable surfaces and filter drains	✓	✓	
	Tanked and piped systems	✓		

A site's drainage design can be made up of a range of SUDS techniques. The variety of SuDS techniques available means that any development should be able to include a scheme based around these principles. These should be explored early on in the design of any development, to ensure they are an integral part of the site layout. Further information on SuDS can be found in:

- CIRIA C522 Sustainable Drainage Systems – design manual for England and Wales
- CIRIA C697 SuDS manual
- CIRIA C609 SuDS management train
- The Interim Code of Practice for Sustainable Drainage Systems.

4. Residual Risk

The residual risk of flooding can be managed and contained safely on site should any drainage features fail (e.g. pumps or hydrobrakes) OR during an extreme storm event. The location and depth and flow routes of any overground flooding should be clearly shown on a plan.

5. Climate change allowances

Guidance on climate change allowances can be found within the National Planning Policy Framework Technical Guidance.

6. Infiltration rates

Infiltration rates should be worked out in accordance with BRE 365. If it is not feasible to access the site to carry out soakage tests before planning approval is granted, a desktop study could be undertaken looking at the underlying geology of the area and assuming a worst-case infiltration rate for that site.

Local policies and recommendations

You should, as part of the surface water strategy, demonstrate to the LPA that the requirements of any local surface water drainage planning policies have been met and the recommendations of the relevant Strategic Flood Risk Assessment and Surface Water Management Plan have been considered.

Further Information

We cannot prepare or provide FRAs. Our Customers and Engagement Team can provide any relevant flooding information that we have available for you to use. There may be a charge for this information. Please email: NETenquiries@environment-agency.gov.uk, or telephone 03708 506 506 and ask for the North East Thames Customers and Engagement team. For further information on our flood map products please visit our website at: www.environment-agency.gov.uk/research/planning/93498.aspx

customer service line
03708 506 506
www.environment-agency.gov.uk

incident hotline
0800 80 70 60

floodline
0845 988 1188

Harriet Peacock

From: Lucy Clifton <Lucy.Clifton@Hackney.gov.uk> on behalf of Planning Enquiries <planning@hackney.gov.uk>
Sent: 18 March 2014 17:26
To: Russell Smith
Subject: FW: Network Rail Consultation - 2014/0249 - Land at Bishopsgate Goods Yard Bethnal Green Road London E1 6GY

FYI

Kind regards

Lucy Clifton
Pre-application Co-ordinator

Development Management
 Planning and Regulatory Services Division
 Legal, HR & Regulatory Services Directorate
 London Borough of Hackney
 2 Hillman Street
 London E8 1FB

Email: lucy.clifton@hackney.gov.uk

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Disclaimer: Any views or opinions expressed in this e-mail are those of the sender, and while given in good faith, do not necessarily represent a formal decision of the Local Planning Authority unless a statutory application is or has been made and determined in accordance with requisite procedures, planning policies and having had regard to material considerations.

-----Original Message-----

From: Stamp Elliot [<mailto:Elliot.Stamp@networkrail.co.uk>] **On Behalf Of** Town Planning SE

Sent: 14 March 2014 14:00

To: Planning Enquiries

Subject: Network Rail Consultation - 2014/0249 - Land at Bishopsgate Goods Yard Bethnal Green Road London E1 6GY

Dear Sir / Madam,

Thank you very much for consulting with Network Rail in regards to the Scoping Opinion request 2014/0249 - Land at Bishopsgate Goods Yard Bethnal Green Road London E1 6GY .

Network Rail is aware of this proposed application and is in dialogue with the developer. Network Rail has no further comment to make.

Thank you.

Kind Regards

NetworkRail

Property

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 Town Planning Technician
 1 Eversholt Street
 London, NW1 2DN
 T 0207 9047247
 M 07740 224772
 E Elliot.Stamp@networkrail.co.uk

www.networkrail.co.uk/property

Please send all Notifications and Consultations to TownPlanningSE@networkrail.co.uk or by post to Network Rail, Town Planning, 5th Floor, 1 Eversholt Street, London, NW1 2DN

-----Original Message-----

From: Christopher Last [<mailto:Christopher.Last@Hackney.gov.uk>]

Sent: 21 February 2014 15:04

To: Town Planning SE

Subject: Consultee letter for PlanningApplication Application: 2014/0249

Please find attached Consultee letter for PlanningApplication application 2014/0249

<http://idox.hackney.gov.uk/WAM/showCaseFile.do?appNumber=2014/0249>

Please send your comments to <mailto:planning@hackney.gov.uk>.

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