

Our Ref: JCG23354

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Date: 22nd September 2017

Mr Tom Buttrick
Planning Officer
5th Floor Hub 2
Southwark Council
PO Box 64529
London
SE1P 5LX

Dear Mr Buttrick,

PROPOSED DEVELOPMENT AT 6-12 VERNEY ROAD, SOUTHWARK

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 2017, REGULATION 6(1) AND (2) – REQUEST FOR SCREENING OPINION FROM A LOCAL PLANNING AUTHORITY

I write on behalf of CB Acquisition LDN Ltd ('the Applicant') to request an EIA Screening Opinion in respect of the proposed development at 6-12 Verney Road in the London Borough of Southwark (LBS). This screening request is made in accordance with Regulation 6 (1) and (2) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations').

The Proposed Development and Planning Background

The proposals are for the erection of three buildings (of up to 16, 17 and 22 storeys, plus basement level beneath two of the buildings). The development would provide a total of 334 residential units, with circa 3,898 sqm of office space, 1,241sqm of community use and 422sqm of retail space. The development would also include hard and soft landscaping works, car parking and cycle parking in the basement.

The site forms part of the Verney Road Industrial Area, is irregular in shape and is approximately 0.76 hectares (ha) in size. The indicative red line plan for this proposed development is shown in Figure 1. The northern and eastern boundary of the site fronts onto Verney Road, with the south and west being adjacent to 18 Verney Road and 4 Verney Road, respectively.

The site also forms part of the Old Kent Road Opportunity Area, subject to a draft Area Action Plan/Planning Framework (May 2016) (found at: <http://modern.gov.southwark.gov.uk/documents/s62045/Appendix%20A%20Draft%20Old%20Kent%20Road%20Area%20Action%20Plan.pdf>), which includes some proposed new and amended policies (June 2017):

<https://www.southwark.gov.uk/assets/attach/3652/OKR%20AAP%20Full%20Proposed%20New%20and%20Amended%20Policies%20optimised%20v2.pdf>

Request for a Screening Opinion

This request for a Screening Opinion seeks agreement from LBS that, with appropriate mitigation in place, the environmental effects of the proposed development are unlikely to be “significant” with reference to the guidance provided by the EIA Regulations and current Planning Practice Guidance (PPG) on EIA. As such, no formal EIA or Environmental Statement (ES) are warranted. This judgement can be robustly made accounting for the conclusions of the EIA Screening Appraisal Report which is included as Annex A.

Figure 1: Red Line Plan



The requirements for EIA are set out in the EIA Regulations 2017. EIA is either mandatory or conditional, depending on the classification of the project. This is based, in turn, on the likelihood of significant environmental effects arising. The proposed development falls under Schedule 2.10(b) ‘Urban development projects’ of the EIA Regulations 2017 and exceeds the screening threshold of ‘150 dwellings’. The overriding determination for EIA is therefore whether the proposed development is likely to result in ‘significant’ effects on the environment.

Although the proposed development is of a scale that exceeds the screening thresholds, we believe that the evidence presented in Annex A demonstrates that there is no reasonable likelihood of significant environmental effects arising from either its construction or operation, accounting for appropriate mitigation and conventional and proportionate planning controls that can be imposed by the Council on such development. Accordingly, with reference to the EIA Regulations and accompanying Government guidance, the Council should conclude that formal EIA is not required in this instance.

We would be grateful if the Council could confirm that the above approach is acceptable and provide its formal Screening Opinion within the statutory period of 21 days of receiving this request.



Yours sincerely,

A handwritten signature in black ink that reads 'H. Waples'.

HOWARD WAPLES
Associate Director, Environment

cc: Rory Joyce, Brunel Planning

Encl: Annex A: EIA Screening Appraisal



6-12 Verney Road, Southwark

EIA Screening Appraisal

CB Acquisition LDN Ltd

September 2017

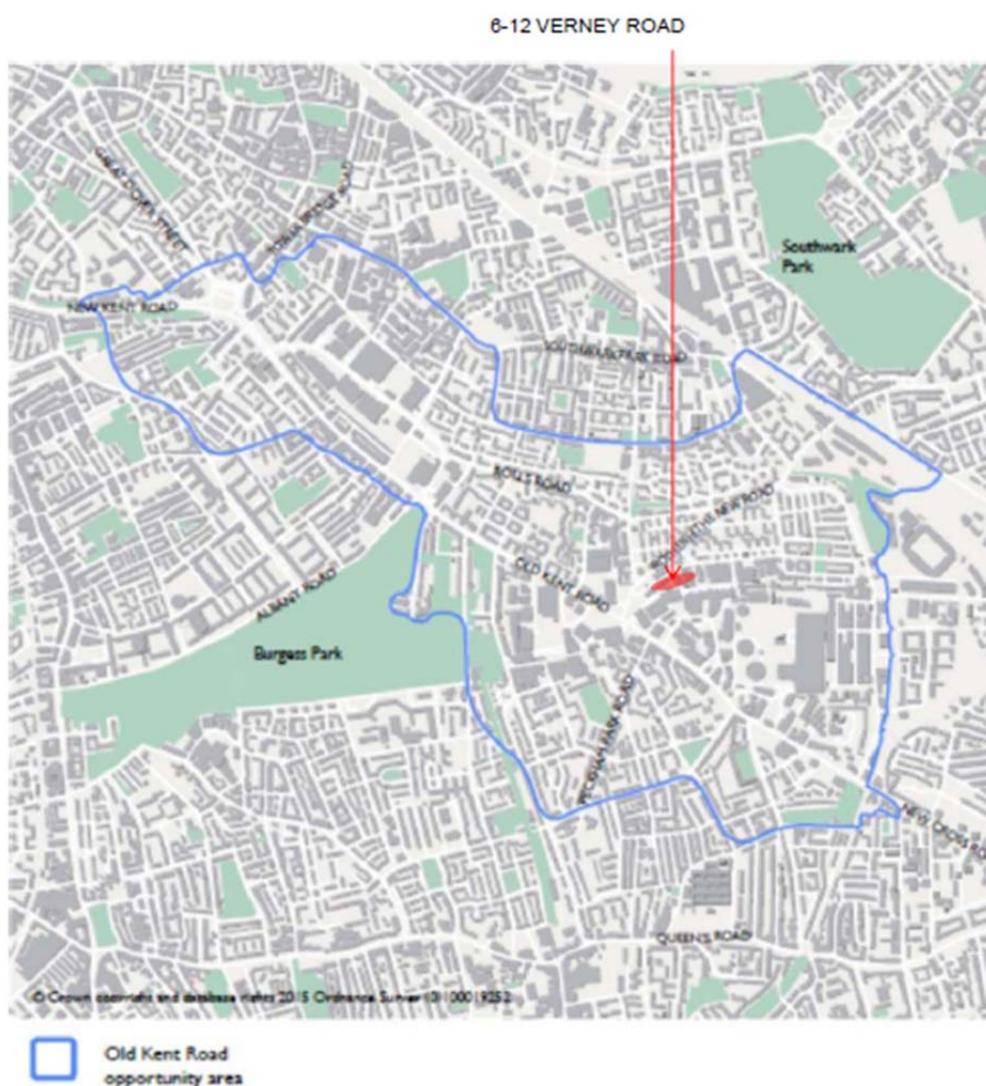
1) Introduction

- 1.1 To determine whether the proposed development requires an EIA or not, the following report has been produced which appraises the scheme against the Schedules 1, 2 and 3 of the EIA Regulations (2017), and against Government Guidance set out in the Planning Practice Guidance here: <http://planningguidance.communities.gov.uk/blog/guidance/environmental-impact-assessment/screening-schedule-2-projects/>

Site Context

- 1.2 The site is located at 6-12 Verney Road, within the 'Verney Road Industrial Area' to the north of Old Kent Road, in the London Borough of Southwark (LBS). The northern and eastern boundary of the site fronts onto Verney Road, with the south and west being adjacent to 18 Verney Road and 4 Verney Road, respectively. The site is approximately 0.76 hectares, and the location is shown in Figure 1.

Figure 1: Site Location Plan



- 1.3 Figure 2 shows an aerial image of the site which includes:

- 6-9 Verney Road - comprising four single storey light industrial units with a two storey office and associated car parking;
- 10-12 Verney Road - comprising an interconnected series of single storey light industrial units with associated car parking.

1.4 These units are currently occupied, and accessed from Verney Road.

Figure 2: Aerial image of site (facing north)



1.5 As mentioned above, the site forms part of the Verney Road Industrial Area and as such industrial employment uses are prevalent to the west, south and east. To the north of Verney Road and Rotherhithe New Road residential uses dominate, the closest of which is approximately 25 metres to the north east. Old Kent Road is located approximately 80 metres to the south. The surrounding buildings are typically low-rise (one to two storeys) although the 399 Rotherhithe New Road project under construction immediately to the north will be part 6, part 19 storeys.

1.6 As shown in Figure 1, the site is located with the Central Area of the Old Kent Road Opportunity Area, and as such the surrounding area is undergoing notable change. Several schemes have been developed within the wider area, including tall buildings, and these are considered cumulatively later in this Screening Appraisal.

Proposed Development

1.7 The proposed development would comprise the demolition of the existing buildings on site and the construction of three blocks, including three tall buildings (ground plus 16, 17 and 22 storeys), approximately 334 residential units, 3,898sqm of office space, 1,241sqm of community use and 422sqm retail space. It will also include landscaping, the development car

parking, cycle parking, refuse storage and plant in the basement, and associated roof plant enclosure.

- 1.8 A ground floor plan of the proposed development is shown in Figure 3, with an indicative view of its appearance provided in Figure 4.

Figure 3: Ground floor plan (with indicative landscaping)

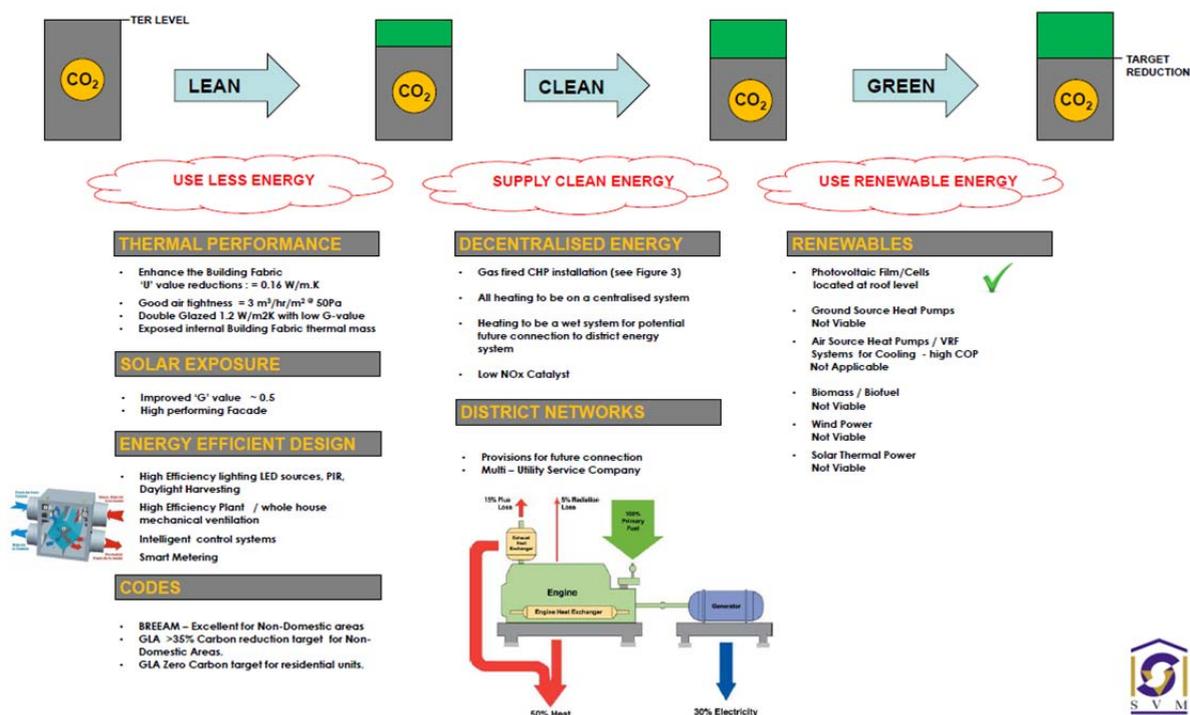


Figure 4: Indicative view (facing south)



- 1.9 The scheme has been designed with energy efficient and sustainable design principles embedded (eg high performance façade design and provisions made for future connection to a District Heating Network), as shown in Figure 5.

Figure 5: Extract from the scheme's emerging Energy Strategy



Planning Policy Context

- 1.10 The Development Plan for the site comprises the following:
- London Plan (Consolidated with Alterations since 2011) - adopted March 2015;
 - Southwark Plan saved policies (2007) – adopted April 2013;
 - Southwark Core Strategy - adopted April 2011.
- 1.11 The New Southwark Plan Preferred Option (June 2017) is currently being consulted upon, before being Examined in Public by the Secretary of State.
- 1.12 The site also forms part of the Old Kent Road Opportunity Area, subject to a draft Area Action Plan/ Planning Framework (May 2016) (found at: <http://modern.gov.southwark.gov.uk/documents/s62045/Appendix%20A%20Draft%20Old%20Kent%20Road%20Area%20Action%20Plan.pdf>), which includes some proposed new and amended policies (June 2017): <https://www.southwark.gov.uk/assets/attach/3652/OKR%20AAP%20Full%20Proposed%20New%20and%20Amended%20Policies%20optimised%20v2.pdf>

2) EIA Screening Assessment

EIA Regulations 2017

- 2.1 The requirements for EIA are set out in the EIA Regulations 2017. EIA is either mandatory or conditional, depending on the classification of the project. This is based, in turn, on the likelihood of significant environmental effects arising.
- 2.2 The EIA Regulations state that:
- “EIA development’ means development that is either:*
- *Schedule 1 development: or*
 - *Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.”*
- 2.3 The process of ‘screening’ for the need to undertake an EIA is predicated on 3 key steps, namely:
1. Establish whether the development is Schedule 1 Development, i.e. does it meet the descriptions of development listed in Schedule 1 of the Regulations. If so, an EIA is always required;
 2. Establish whether the development is Schedule 2 Development i.e. does it meet the descriptions of development listed in Schedule 2; does it meet or exceed the thresholds in Schedule 2 or is it located in a ‘sensitive area’ as defined in Regulation 2(1); and,
 3. If the development can be defined as Schedule 2 Development, consider whether it is likely that the development will have significant effects on the environment (through consideration of factors identified within Schedule 3 of the EIA Regulations). If so, an EIA should be requested. If not, consider whether any further environmental information is necessary to supplement the planning application.
- 2.4 The proposed development does not meet any of the descriptions of development listed in Schedule 1 of the Regulations, and therefore it is not Schedule 1 development.
- 2.5 To determine whether the proposed development is Schedule 2 Development, an assessment needs to be made as to whether:
- The proposals meet the descriptions of development in Schedule 2; and
 - The proposals meet or exceed the thresholds in Schedule 2 and/or whether the development is located in a ‘sensitive area’ as defined in Regulation 2(1).
- 2.6 The proposed development falls under Schedule 2.10(b) ‘Urban development projects’ of the EIA Regulations 2017. The applicable screening thresholds for such urban development projects are if:
- the development includes more than 1 hectare of development which is not dwellinghouse development; or
 - the development includes more than 150 dwellinghouses; or
 - the area of the development exceeds 5 hectares.

- 2.7 The site is approximately 0.76 hectares in size and is not located within or close to a 'sensitive area' as defined in Regulation 2(1). However, the proposed development does exceed the 150 dwellinghouse threshold and is therefore classified as a 'Schedule 2 development' for the purpose of screening.
- 2.8 The overriding determination for EIA is therefore whether the proposed development is likely to result in 'significant' effects on the environment. Schedule 3 of the EIA Regulations details the relevant selection criteria to assess whether the Schedule 2 development is likely to have significant effects on the environment. The three key criteria of Schedule 3 that should be considered in this case are as follows:
1. 'Characteristics of development' (size, cumulation with other development, use of natural resources, production of waste, pollution and nuisances and risk of accidents);
 2. Location of the development and 'environmental sensitivity' of the site; and
 3. The 'characteristics of the potential impact' (extent, magnitude, probability, duration, frequency and reversibility).

Environmental effects of the development

- 2.9 The three criteria in Schedule 3 of the EIA Regulations have been considered in further detail in the sections below. The size of the site itself is approximately 0.76ha, well below the 5ha threshold for Urban Development Projects under the EIA Regulations. Nevertheless, as described above, the density of dwellings does exceed the 150 dwellinghouse threshold. In addition, the tallest element of the proposed development will be ground plus 22 storeys high, which would be substantially taller than the existing buildings on site and much of the surrounding area. However, the impact of the proposed development is considered unlikely to give rise to markedly different impacts when taking into consideration the urban nature of the site context, with taller buildings existing nearby and more coming forward (such as those described in the cumulative section of this Screening Appraisal).
- 2.10 The size of the proposed development on its own however should not be the key determining factor in deciding whether or not EIA is necessary. Moreover, indicative thresholds given in the EIA Regulations and The Government's Planning Practice Guidance (PPG) do not in any way compel or otherwise imply that an LPA must adopt a positive screening opinion. Rather than the size of any particular development, the PPG on EIA advises that the key issues to consider are "potential increases in traffic, emissions and noise" which are discussed in subsequent sections of this Screening Appraisal.
- 2.11 The PPG on EIA states that with regard to 'environmental sensitivity' of the site, local designations which are not included in the definition of 'sensitive areas' contained in the EIA Regulations, but which are nonetheless environmentally sensitive, may also be relevant in determining whether an assessment is required. In considering the sensitivity of a particular location, regard should also be had to whether any national or internationally agreed environmental standards (e.g. air quality) are already being approached or exceeded. The site is not in or near a 'sensitive area' as defined by the EIA Regulations (i.e. a SSSI, National Park, the Broads, World Heritage Site, Scheduled Monument, Area of Outstanding Natural Beauty, or a European wildlife site). However the site is located within an Air Quality Management Area (AQMA) and the Bermondsey Lake Archaeological Priority Zone.

2.12 The following environmental effects are relevant to the proposed development at the site, each of which is considered in further detail in the subsequent sections:

- Townscape, Built Heritage and Visual Impact;
- Archaeology;
- Transport;
- Air Quality;
- Noise and Vibration;
- Ecology and Biodiversity;
- Water Resources and Flood Risk;
- Contaminated Land;
- Daylight, Sunlight and Overshadowing;
- Wind Microclimate
- Waste and Natural Resources;
- Climate Change;
- Cumulative effects.

Incorporated mitigation

2.13 As stated in the 2017 Regulations, measures to mitigate adverse effects should be identified (where known) and taken into account by the LPA when deciding on a Screening Opinion and:

“Where it is determined that the proposed development is not Environmental Impact Assessment development, the authority must state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment”

2.14 Therefore, for clarity, known and reasonably foreseeable mitigation measures have been set out below and in the following technical sections, which the Applicant commits to at this stage.

2.15 A Construction Environmental Management Plan (CEMP) will be developed by the Applicant to inform and manage the potential construction impacts of the proposed development. The implementation of the procedures and ‘site rules’ set out in the CEMP (including a commitment to sign up to the UK Considerate Contractors scheme) will be a pre-condition for the appointment of the main contractors for the project. This will ensure that a consistent approach to site environmental management is employed in line with good practice guidance, thereby avoiding, minimising or compensating for any potentially significant effect to the environment and people during the construction phase.

2.16 Other careful and sensitive design measures set out in the following sections have been incorporated to avoid significant operational effects.

Townscape, Built Heritage and Visual Impact

2.17 The proposed development comprises three buildings ranging from 8 to 24 storeys. Immediately to the north of the site is the 399 Rotherhithe New Road development (under construction) that is part 6, part 19 storeys, and there are other tall buildings proposed and

under construction in the wider area, in keeping with the policies of the OAPF. However, in the context of its existing surrounds, the proposed development is considered to be a tall building and has the potential to impact upon the visual townscape of the area.

- 2.18 The site does not fall within any designated local or regional views set out in Southwark's adopted Local Plan or the London Plan. Policy DM17 of the emerging New Southwark Plan (New and Amended Policies, June 2017) identifies six 'important borough views'. The proposed development will potentially be visible within View 1 ('the panoramic north facing view from One Tree Hill'), and View 3 ('the view of St Paul's Cathedral from Nunhead Cemetery').
- 2.19 Visual receptors include listed buildings, conservation areas and registered landscapes. Adverse visual effects on these receptors can and will be mitigated through appropriate design of the proposed development. The incorporation of carefully designed landscaping, making use of existing vegetation with supplemental planting as early as possible in the construction phase to protect the key views will help ensure the proposed development does not have an adverse effect on the existing views and local townscape characters. The proposed development has been designed in a manner that ensures it fits sensitively within the existing townscape.
- 2.20 The proposed development is not located within a Conservation Area. Furthermore, whilst a number of listed buildings and conservation areas are located within 1km of the site, the majority are considered to be sufficiently well concealed from the site in terms of visual, traffic, emissions and noise impacts through the density of surrounding buildings within the area, such that they are unlikely to experience any significant effects as a result of the proposed scheme.
- 2.21 A full townscape, heritage and visual impact assessment (including rendered Accurate Visual Representations (AVR)) will be undertaken and accompany the forthcoming planning application which will highlight the high quality of the architectural design and the arrangement of the buildings within the site to create a sense of place that is currently lacking in the townscape area and would appear as a high quality addition to the skyline.
- 2.22 It is therefore considered that the completed development will have no significant adverse effects on the townscape character, heritage and views of the site.

Archaeology

- 2.23 The Site is located in an LPA designated Class Two Archaeological Priority Area (Bermondsey Lake).
- 2.24 Due to the sites location and archaeological designation, a number of Southwark Local Policies are applicable. These are as follows:
- Southwark Core Strategy Strategic Objective 2F;
 - Southwark Core Strategy Policy 12;
 - Saved Southwark Policy 3.19 Archaeology;
 - New Southwark Plan Preferred Option (2015 Policy DM 18 Archaeology).
- 2.25 New Southwark Plan Preferred Option Policy DM 18 (2015) requires that proposals that are granted planning permission within Class Two Archaeological Priority Zones will be

conditioned to achieve the preservation, recording, archiving, publication and display of a site according to its significance.

- 2.26 Due the inclusion of a basement within the development proposals, it is likely that any required excavation works would remove any archaeological findings from the site. It is not currently known of what importance this archaeology could be.
- 2.27 However, in order to determine the archaeological potential of the site, a suitable evaluation of materials reviewed from the Phase 2 ground site investigation surveys will be completed. This will help to identify whether there could be archaeological / geo-archaeological potential at the site.
- 2.28 Evaluation and (if necessary) mitigation measures will be agreed with LBS's Senior Planner (Archaeology) to ensure that appropriate methods are agreed upon to ensure no significant effects.

Transport and Access

- 2.29 The site is located within an accessible area and has a PTAL rating of 4 (good), which means that the site benefits from good access to public transport. The site is served by a number of nearby transportation links including access to South Bermondsey Rail Station, which is located to the north west of the site. This station provides direct connections to London Bridge, Wimbledon, Epsom, and West Croydon. The site is also well served by a number of bus routes that operate along the A2 Old Kent Road. Bus services operating near the site provide access to much of London, including Oxford Street, Waterloo, Peckham, Lewisham, Marylebone and Deptford.
- 2.30 As part of the development of the Opportunity Area, an extension to the Bakerloo London Underground Line is proposed. This will introduce a new London Underground station on Old Kent Road, potentially within 600m-800m of the site. With this station in place, there is the potential for the PTAL of the site to increase to 5 (very good). This will substantially reduce journey times on local public transport for existing and new residents and workers within LBS.
- 2.31 In addition, there are proposals to for a New Cycle Superhighway (CS4) to operate between London Bridge and Woolwich. The exact route is to be consulted on, but is likely to include the A2 Old Kent Road.
- 2.32 As a result of good accessibility of the site by non-car modes, the proposed development will only include low levels of car parking spaces. It is proposed that nine disabled access vehicle parking spaces are provided, and two car club parking spaces. No additional parking is proposed. Cycle parking provision will accord with London Plan minimum standards. It is considered that the provision of good quality cycle parking facilities will encourage cycling to and from the site.
- 2.33 A Transport Assessment will be produced in support of the forthcoming planning application, the scope of which will have been agreed with LBS Highways. This will provide details of the number so trips generated by the proposed development, such as from its residents, servicing vehicles and those who will be working or visiting. A preliminary assessment identifies that the net proposed development trips generated by each mode of transport could be accommodated within the surrounding transport infrastructure. In addition, operational traffic flows are expected to be lower than existing levels due to the change in use of the site from light industrial to a residential led scheme, and the low parking provision proposed.

- 2.34 There are therefore not anticipated to be any significant adverse effects to traffic and transport.

Air Quality

- 2.35 The site lies within a borough-wide Air Quality Management Area (AQMA), declared for exceedances of the annual mean NO₂ and daily PM₁₀ objectives.
- 2.36 An Air Quality Assessment will be produced to accompany the planning application, and preliminary assessment results indicate that, despite being in an AQMA, the site is of sufficient distance from the A2 (Old Kent Road) and A2208 (Rotherhithe New Road) to ensure it is suitable for its proposed residential use without the need for mechanical ventilation.
- 2.37 An Air Quality Neutral Assessment will also be undertaken; with it considered that the site has the potential to achieve Air Quality Neutral status.
- 2.38 Due to the low number of car parking spaces proposed and reduction in servicing and goods vehicles compared to the existing situation, it is not considered there will be a significant effect on air quality from traffic.
- 2.39 The proposals include a centralised energy centre, which will produce emissions of nitrogen oxides (NOx). These emissions have been modelled from where they emerge from the stack at the top of Tower 3, and will not have a significant effect on any existing or future receptors.
- 2.40 During the demolition and construction there is a risk of dust (PM₁₀) deposition and other emission from construction plant and vehicles. However, through good site practice and the implementation of suitable mitigation measures, the effect of dust and emissions would be substantially reduced. These emissions would be managed as part of the CEMP and Construction Logistics Plan (CLP), expected to be required through a planning condition. The residual effects of the construction phase on air quality were considered to be not significant.

Noise

- 2.41 The site is located on the edge of an industrial area and adjacent to Verney Road, which does not have substantial traffic numbers. However, it is close to the A2 (Old Kent Road) and A2208 (Rotherhithe New Road), and so noise at the site and surrounding sensitive receptors, such as nearby residents, is therefore likely to be dominated by road traffic and general industrial noise. Noise surveys have been undertaken to record the baseline conditions.
- 2.42 The proposed development will be designed in line with recommendations from a specialist noise consultant to meet internal noise criteria standards, and any required mitigation measures such as suitable glazing and sound insulation will be incorporated into the design.
- 2.43 Construction of the proposed development will give rise to noise and vibration from both plant used for construction activities and noise associated with construction vehicles accessing the site. It is expected that construction phase noise impacts will be controlled through a CEMP and the employment of best practice measures to minimise noise.
- 2.44 Operational traffic and associated noise is expected to be similar to existing levels due to the change in use of the site from a light industrial use to a residential led scheme. It is unlikely that any noise from operation of the proposed development will give rise to significant additional noise impacts on sensitive receptors.

- 2.45 A noise assessment will accompany the planning application to ensure that no significant effects on surrounding receptors are likely and that internal noise levels within the development itself are within acceptable limits for residential use.

Ecology and Biodiversity

- 2.46 A Phase 1 Habitat Assessment was undertaken in March 2016 which identified that the site offers no suitable nesting or foraging opportunities for bats or other protected species, nor does it include any waterbodies to support amphibians. The site has very limited vegetation, with scattered tall ruderals and one broadleaved tree (classified as a category 'C' tree of low retention value) recorded along the site's boundaries. The tree will be removed and replaced in accordance with the landscaping strategy.
- 2.47 Overall, the site is deemed of low ecological value. There are no statutory designated sites for nature conservation within 1km of the site however there are non-statutory designated sites in proximity to the site including: Varcoe Road Nature Garden SNCI (approximately 410m east); Bird-in-Bush Park SNCI (approximately 550m south); South Bermondsey Railway Embankments SNCI (approximately 500m north east; and Burgess Park (approximately 650m south west).
- 2.48 Invasive species, comprising of Japanese Knotweed and Cotoneaster, were present at the site, and prior to development commencing the Japanese Knotweed and associated soil will be excavated and removal to suitably licensed landfill and Cotoneaster will be treated with herbicide.
- 2.49 Impacts to wildlife (such as breeding birds) during construction activities will be minimised through implementation of a CEMP and best practice measures. In addition, all works completed at the site will be carried out in accordance with relevant wildlife legislation to avoid harm to protected species.
- 2.50 Biodiversity enhancement measures would be incorporated into the landscaping scheme of any proposed works to maximise the ecological value of the site. This would include planting of habitats which will be of value to wildlife and provision of nesting/roosting habitat, such as installation of nest boxes for species such as house sparrow, dense scrub or native thicket for bird species and bat boxes.
- 2.51 Overall, it is considered that impacts to ecology will be beneficial.

Water Resources and Flood Risk

- 2.52 The site is located approximately 1.2km west of the River Thames. It is shown in the EA Flood Map as being located within the tidal floodplain of the River Thames (Flood Zone 3), where the probability of fluvial and tidal flooding is classified as 'high' (i.e. greater than 0.5% every year). However, the area is protected against tidal flooding from the River Thames by flood defences to a 1 in 1000 year return period flood event (i.e. 0.1% annual probability).
- 2.53 A Flood Risk Assessment has been produced which indicates that this site has not previously been affected by fluvial/tidal flooding. The Strategic Flood Risk Assessment (SFRA) confirms that the borough of Southwark is largely underlain by London Clay bedrock, and being an impervious layer, the risk of groundwater flooding is therefore typically very low. The SFRA also provides no evidence to suggest that the site is susceptible to overland flooding or sewer flooding.

- 2.54 In terms of off-site flood risk from the proposed development, the peak foul water discharge is likely to represent an increase over the existing situation due to the increased population and their associated activities. The foul water will be discharged to the public foul/combined sewer within Verney Road via the foul/combined connection that currently serves the existing development, if viable, or a new connection/s if required (subject to the consent/approval of Thames Water).
- 2.55 The existing site is 100% impermeable with surface water from the existing development currently discharging to the public sewer network unrestricted. The proposed development will incorporate permeable paving and small areas of landscaping and green roof and will therefore offer an immediate small overall net reduction in impermeable area and therefore run-off rate.
- 2.56 It is proposed to provide two below ground cellular attenuation structures which will restrict the discharge rate from each structure to a maximum of 2.5 l/s, so 5 l/s in total, with the balance of flows being attenuated on site up to the 100 year climate change event. This is in accordance with London Plan and AAP23 guidance and will offer a significant reduction in surface water discharge, and associated flood risk, when compared to the existing scenario. The proposed surface water drainage strategy will provide an opportunity to fully mitigate for the increase in foul water.
- 2.57 The proposed development will help to prevent pollution (such as hydrocarbons) getting into the Thames Water network and affecting other water resources. The proposed development is residential and therefore is classified as a low pollution risk, compared to the current light industrial uses. Run-off from external areas soaking through the proposed permeable paving areas will receive an adequate level of treatment via filtration through the associated substrate. Any positive external run-off will pass through trapped gullies or drainage channels. Maintenance will be undertaken by an estate management company. Although the proposed SuDS techniques are considered to be generally low maintenance, they will require annual inspection for silt build up and potential blockages and the permeable paving should be jetted to clear any debris.
- 2.58 The site is not located within a groundwater Source Protection Zone (SPZ) and the nearest groundwater abstraction is located approximately 965m to the southeast of the site. The nearest surface water feature is an unnamed pond, which is located approximately 900m to the west of the site. The potential risk to these water resources are considered to be low.
- 2.59 Therefore, there will be no significant adverse effects, and will more likely result in beneficial effects.

Ground Conditions and Contaminated Land

- 2.60 A Phase 1 Preliminary Risk Assessment was undertaken which identified current and historical industrial uses at and around the site, which lead to the potential for contamination to be present, and identified a number of potential pollutant linkages to human health receptors associated with the site. An intrusive Phase 2 Environmental and Geotechnical Site Investigation was subsequently undertaken to determine whether these linkages were active and to inform preliminary foundation and basement design.
- 2.61 A variable thickness of Made Ground was encountered beneath tarmac or concrete hardstanding. This was underlain by Alluvium, overlying in turn the Kempton Park Gravel Formation, Thanet Formation and White Chalk Subgroup.

- 2.62 A number of non-volatile contaminants of concern were recorded within soils sampled from the Made Ground at concentrations in excess of their adopted generic assessment criteria (GAC). In addition, asbestos was recorded within two samples of Made Ground.
- 2.63 A substantial volume of the Made Ground beneath the site will be removed as part of the proposed basement construction. Any potential risk associated with these contaminants of concern in remnant Made Ground would be mitigated by the presence of building cover and hardstanding. A layer of validated clean topsoil will be provided to break pathways of direct contact and ingestion in soft landscaped areas (a minimum of 300mm thickness in communal soft landscaping areas and 600mm in any private gardens).
- 2.64 Volatile contaminants of concern were also recorded within a sample of Made Ground collected from a borehole in the west of 12 Verney Road; however, the soil from which this sample was taken is likely to be removed as part of basement excavation with further validation sampling undertaken.
- 2.65 The concentrations of contaminants of concern encountered within groundwater beneath the site are not considered to pose a potentially significant risk to off-site human health receptors.
- 2.66 On the basis of the above, and subject to the recommended mitigation measures being implemented (e.g. through the CEMP), the potential for significant risk to be posed to human health receptors from groundwater beneath the site is considered to be low.
- 2.67 Basic ground gas protection measures will be installed by a suitably qualified person and approved by Building Control, leading to a low risk to human health receptors and infrastructure.
- 2.68 Should any dewatering works be required as part of the excavation for the basement level, potentially contaminated perched groundwater and groundwater within the underlying natural strata may be removed, which would lead to long-term betterment in groundwater quality beneath the site.

Daylight and Sunlight

- 2.69 Due to the height of the proposed development, in particular in the context of lower surrounding residential and commercial properties, the proposed development has the potential to create an obstruction to daylight and sunlight to surrounding properties.
- 2.70 A full daylight, sunlight and overshadowing assessment (in accordance with the BRE guidance 'Site layout planning for daylight and sunlight: A guide to good practice') will be provided as part of the forthcoming planning application. This will present quantified results using the measurements of Vertical Sky Component (VSC), Average Daylight Factor (ADF) and No Sky Line (NSL).
- 2.71 The BRE Guidance identifies if a level of retained VSC is below 27% this may lead to adverse effects on daylight amenity. However, it should be noted that the BRE Guidance was intended to be applied to sub-urban areas, rather than denser inner-city areas. Indeed, given that the site is located within an Opportunity Area, it is considered that retained VSC levels of substantially lower than this are appropriate.
- 2.72 Surrounding properties with an expectation of daylight and sunlight amenity include the 399 Rotherhithe New Road to the north of Verney Road (which although is under construction has

been assessed as completed) and other residential uses to the north east of Verney Road/Verney Way and to the south west on Canal Grove.

- 2.73 Preliminary results indicate that the vast majority of windows (aside from those heavily self-obstructed by private amenity balconies) in the 399 Rotherhithe New Road scheme will have retained levels in excess of 15%, and many over 20%.
- 2.74 The remaining sensitive receptors surrounding the site are further afield and generally in the realms of minor adverse significant effects (i.e. within 10% of the BRE targets).
- 2.75 It is therefore considered the daylight and sunlight impacts of the scheme upon the surrounding residential properties are acceptable in the context of the Opportunity Area.
- 2.76 An overshadowing assessment of the internal amenity areas within the proposed development have also been undertaken in accordance with the two-hour sun on ground assessment criteria set out in the BRE Guidance, and the sunlight availability is generally considered to be acceptable.

Wind Microclimate

- 2.77 The proposed development introduces an increase in the massing on the site relative to the baseline which will influence the way wind will flow at ground level both within the site and the surrounding area.
- 2.78 So as to ensure that the likely wind microclimate impacts are fully understood from the proposed development, a wind tunnel assessment will be undertaken using a scale model and considering a full wind frequency distribution in terms of both wind direction and wind speed. It will consider the likely wind conditions with reference to the established Lawson Comfort Criteria, in terms of whether parts of the site and immediate surroundings will be suitable for their intended use (such as seating areas, entrances and as thoroughfares).
- 2.79 The wind tunnel test results will be provided in support of the planning application and will identify whether there are any areas that need specific mitigation (such as planting, screening/canopies, power assisted doors, etc). Where mitigation is required, further wind tunnel testing can be conducted to verify the effectiveness of proposed mitigation measures to ensure there are no significant effects.

Waste and Use of Natural Resources

- 2.80 The proposed development comprises a basement which would generate a substantial amount of excavated material. Construction and excavation waste, including off-cuts and excess concrete and bricks etc. will be managed by the contractor(s) in line with current local and national legislation and best practice as well as sector-specific initiatives such as WRAP's 'Halving Waste to Landfill' document. The Applicant will deal with waste materials in accordance with the Environmental Protection (Duty of Care) Regulations 1991 and will apply the waste hierarchy, preventing the production of waste and reusing waste on site where possible.
- 2.81 Sustainable building practices will be considered to further enhance the environmental design of the proposed development and reduce energy and resource usage, reduce waste, and cut carbon emissions.

- 2.82 Prior to commencement of the proposed development, a report could be prepared which identifies the volume and type of material to be demolished and/or excavated, opportunities for the reuse and recovery of materials and demonstrates how off-site disposal of waste will be minimised and managed.
- 2.83 It is anticipated that the volumes of operational waste from the built development (primarily domestic waste and small quantities of commercial waste) can be readily accommodated by existing off-site waste management infrastructure. Operational waste will be disposed of in line with LBS requirements and managed in accordance with all applicable legislation. A Delivery and Servicing Plan and an Operational Waste Management Strategy will also be prepared for the proposed development.

Human Health

- 2.84 Health impacts during construction, such as those associated with dust emissions, will be mitigated through measures identified previously (e.g. CEMP) to ensure that no significant adverse effects result.
- 2.85 Good quality housing is a very important determinant of health, as confirmed by the Healthy Urban Development Unit. The replacement of a contaminated light industrial site with a well-designed residential-led scheme would not result in any material health and wellbeing impacts. Employment opportunities lost from the existing site would be replaced by new opportunities in the proposed development.
- 2.86 The provision of the cycle parking will also encourage physical activity from its pupils, with the community also benefiting from the activities and events that will be provided within the proposed community space.
- 2.87 Therefore the proposed development would have an overriding beneficial effect on health and wellbeing.

Risk of Accidents

- 2.88 During the construction phase, certain materials may be present on the site which may be harmful to the environment. Appropriate measures, in accordance with all relevant legislation, will be used to prevent accidental spillages of contaminants during the construction of the proposed development. The contractor(s) will implement measures in accordance with Health and Safety legislation/requirements and best practice to minimise the risks of accidents that would have effects on people or the environment. All such measures will form part of the CEMP. It is therefore considered that there will be no significant environmental effects.
- 2.89 The operational development is not expected to involve the use, transport or production of substances or materials which are hazardous or could be harmful to the environment. There is not anticipated to be a requirement to store large volumes of hazardous materials. Any such materials will be stored and handled in accordance with relevant legislation.
- 2.90 With regard to safe access to the site, a description of how the site can be safely accessed by pedestrians, cyclists and vehicles during both construction and operation will be set out in the Transport Assessment.
- 2.91 Accordingly, there are no anticipated significant risks of accidents during operation of the proposed development.

Cumulative effects

2.92 In addition to the proposed development there are a number of additional permitted 'major' development sites in the vicinity of the site (approximately 1km) which have been listed in the table below.

| Site and Planning Reference | Scheme Description | Decision and Date |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| 1. Wood Dene, Site Bounded by Queens Road, Meeting House Lane and Carlton Grove SE15 13/AP/0876 | Demolition of remaining structures and erection of three buildings between two and nine storeys in height to provide 333 residential units and 450sqm (GIA) of flexible retail (Classes A1-A3) / Office (Class B1) / Non-Residential Institution (Class D1) space together with the provision of access, car and cycle parking, plant, landscaping and an energy centre. | Approved 29/7/13 |
| 2. Aylesbury Estate, Land Bounded By Albany Road, Portland Street, Bagshot Street, Alvey Street, East Street And Dawes Street, London SE17 14/AP/3844 | Outline application for: demolition of existing buildings and phased redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 to 20 storeys in height (12.45m - 68.85m AOD) with capacity for up to 2,745 residential units (Class C3), up to 2,500sqm of employment use (Class B1); up to 500sqm of retail space (Class A1); 3,100 to 4,750sqm of community use; medical centre and early years facility (Class D1); in addition to up to 3,000sqm flexible retail use (Class A1/A3/A4) or workspace use (Class B1); new landscaping; parks, public realm; energy centre; gas pressure reduction station; up to 1,098 car parking spaces; cycle parking; landscaping and associated works. The application is accompanied by an Environmental Statement pursuant to the Town and Country Planning Regulations (Environmental Impact Assessment) 2011 | Approved 5/8/15 |
| 3. Eagle Wharf, 90-96 Peckham Hill Street, London, SE15 5jt 16/AP/2649 | Construction of part three/part four/part five storey building for to provide a School of Theatre Arts comprising teaching, rehearsal and administrative accommodation and theatre (Class D1), and cafe/restaurant/bar (Class A3/A4) with associated landscaping to Peckham Square and Peckham Hill Street. Provision of new vehicular access from Peckham Hill Street with associated servicing, disabled parking, cycle and refuse storage areas. | Approved 28/9/16 |
| 4. 399 Rotherhithe New Road, London, SE16 3HG 13/AP/0065 | Demolition of existing building and the erection of a part 6, part 19 storey building (maximum height from ground 61.3m) with basement for a mixed use scheme comprising of 158 residential dwellings, primary school for Southwark Free School, sixth form and community centre for City of London Academy, with associated amenity and play space, basement car and cycle parking and landscaping. | Under construction * |
| 5. Varcoe Service Station, 4-28 Varcoe Road, London, SE16 3DG 16/AP/5235 | Demolition of existing building and development comprising a part six, part 7 and part eight storey building to accommodate 57 new affordable residential units (Use Class C3) and provision of flexible employment / retail space on ground floor (Use Class B1, A1-A3). (This application represents a departure from strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and saved policy 1.2 'strategic and local preferred industrial locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location). | Pending |
| 6. 8-24 Sylvan Grove, London, SE15 1PE 15/AP/1330 | Redevelopment of the site to construct a part two, part five, part six and part eight storey building comprising 80 residential units (23 x one bed, 41 x two bed and 16 x three bed) for both private and affordable tenures with associated car parking and landscaping | Approved 21/10/15 |
| 7. 525-539 Old Kent | The erection of a part four, part five and part six storey building to | Approved |

| Site and Planning Reference | Scheme Description | Decision and Date |
|------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| Road, London, SE1 5EW 14/AP/4905 | provide 43 residential flats (8 x one-bed, 26 x two-bed and 9 x threebed), with associated car parking, cycle and refuse store and amenity space. | 30/3/15 |
| 8. Universal House St James's Road 14/AP/0790 | Change of use from Class B1(a) offices to Class C3 (residential apartments). The proposed development consists of the conversion of all three floors within the existing building into 34 apartments (8 x studios, 9 x 1 beds and 17 x 2 beds), No material external alterations to this building form part of these proposals | Approved 6/5/14 |
| 9. Former Petrol Station St James's Road 15/AP/1705 | Demolition of existing petrol filling station and erection of building up to 8 storeys with residential accommodation 34 dwellings and 127sqm of flexible use (Class A1 or B1) at ground floor level only together with access, hard landscaping and other associated works. | Approved 13/6/16 |
| 10. Millwall Redevelopment (LB Lewisham) DC/11/76357 | A comprehensive phased mixed-use development of the site for up to 240,000 m ² of development. In summary this consists of Class A1/A2 (Shops and Financial and Professional Services) up to 3,000 sq m; Class A3/A4 (Cafes/Restaurants and Drinking Establishments) up to 3,000 sq m; Class A5 (Hot Food Takeaways) up to 300 sq m; Class B1 (Business) between 10,000 sq m - 15,000 sq m; Class C1 (Hotels) up to 10,000 sq m; Class C3 (Dwelling Houses) between 150,000 sq m - 190,000 sq m (up to 2,400 homes of different sizes and types); Class D1 (Non-Residential Institutions) between 400 sq m - 10,000 sq m; Class D2 (Leisure and Assembly) between 4,260 sq m - 15,800 sq m (excluding the Stadium which remains but including a replacement ground person's store of 140 sq m). involving the demolition of all existing buildings on the site with the exception of the Millwall FC Stadium (which is to be retained and its facade upgraded and / or reclad). | Approved 30/03/12 |
| 11. Land bounded by Glengall Road, Latona Road and Old Kent Road OKR 14 of emerging Old Kent Road AAP | Required land uses: Residential (C3 use class); community (D use class) including gallery space/artists' studios; employment (B use class); town centre uses including replacement retail (A use class); public open space. Indicative capacity: 3,170 homes | n/a |
| 12. Malt Street Regeneration, Land bounded by Bianca Road, Latona Road, Haymerle Road, FRensham Street and Malt Street. 17/AP/2773 | Hybrid application comprising a full planning application for Phase 1 and outline planning permission for subsequent Phases: Full planning permission is sought for the demolition of existing buildings and structures and redevelopment of the central area (Phase 1) for the erection of 3 buildings at 6, 15 and 40 storeys (+137.070m AOD) (+ single basement) to provide 359 new homes and 1,796sqm (GEA) of non-residential floor space within classes A1-A4 (retail), class B1 (business), class D1 (community uses) and class D2 (leisure uses); an energy centre (750sqm), new public open space and public realm, associated car parking (including 4 car club spaces), 563 cycle spaces and other associated works; Outline planning permission (scale, layout, landscaping, access and appearance reserved) for the demolition of existing buildings and structures and erection of a series of buildings to provide up to 72,400sqm (GEA) of floor space ranging in height from +21.4m AOD to +111.8m AOD, comprising up to 691 residential units and up to 3,704sqm (GEA) of non-residential floor space within classes A1-A4, class B1, class D1 and class D2, with associated public open space, public realm, car parking, cycle parking and associated works. (This application represents a departure from strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and saved policy 1.2 | Pending |

| Site and Planning Reference | Scheme Description | Decision and Date |
|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| | 'strategic and local preferred industrial locations' of the Soutwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location). The application is accompanied by an Environmental Statement (ES) submitted pursuant to the Town and Country? Planning (Environmental Impact Assessment) 2011 (as amended) | |
| 13. 17/AP/0138 | Construction of 13 residential units comprising 5 x 2-bed units within a new 6 storey building located between the Elliston and Wilkins buildings and 8 further residential units (4 x 1-bed, 2 x 2-bed and 2 x 3-bed) within a single storey extension creating a fifth floor across both Elliston and Wilkins buildings. Associated circulation space, bike store (providing 20 cycle spaces), bin store and 1 disabled parking space. | Pending |
| 14. 17/AP/1646 | Demolition of the existing buildings to facilitate the redevelopment of the site to create 42x residential units and 272 sq m (GIA) of flexible commercial floorspace (Class A1/A2/A3/B1) in a new building of between three and six storeys in height, together with disabled car parking, cycle parking, landscaping, plant, and associated works. | Pending |

* adjacent to site.

- 2.93 The EIA Screening process requires the consideration of potentially significant effects in combination with other reasonably foreseeable schemes.
- 2.94 Bearing in mind the reasoning set out in the individual environmental topic sections above that sets out measures to mitigate impacts and identifies no likely significant effects, it is considered that impacts cumulatively with other schemes can also be mitigated to non-significant levels.
- 2.95 Clearly, the development of the Old Kent Road Opportunity Area will lead to some major changes in the area, with a substantial densification of uses and introduction of many new residents and employment opportunities. This will put pressure on existing service and utility infrastructure, the transport network and social infrastructure (amongst other things) which could cause significant effects if allowed to come forward in an un-coordinated way.
- 2.96 However, a number of things should be taken into account by way of ensuring the strategic co-ordinated development comes forward. For example, the London Underground Bakerloo Line Extension is planned and this will introduce a new LU station within close walking distance of the site. A combined SuDS strategy is also proposed, which will introduce areas of surface water to not only attenuate water after rainfall events, but also enhance amenity and ecology.
- 2.97 The Opportunity Area's Area Action Plan is subject to an Integrated Impact Assessment, which considers strategically the challenges and opportunities with regards to sustainability, health and equalities. This should ensure that the emerging OA policies take into account these issues and steer development away from potentially significant adverse effects.
- 2.98 Cumulative impacts can also occur on a smaller spatial scale, and it should be noted that the 399 Rotherhithe New Road scheme is adjacent to the north of the proposed development site. As it is under construction at the time of writing, the various assessments described above (eg the daylight assessment) have taken it into consideration as being completed and

operational for the purposes of assessing impacts upon it, and have found these to be acceptable.

3) Screening Conclusions

3.1 The PPG on Screening Schedule 2 developments states:

“Only a very small proportion of Schedule 2 development will require an assessment...”

3.2 The proposed development at Verney Raod falls under Schedule 2.10(b) ‘Urban Development Projects’ where:

“(ii) the development includes more than 150 dwellinghouses”.

3.3 This exceedance triggers the need for a Screening Opinion, and the requirement for an EIA depends on the environmental sensitivity and characteristics of the site and the likelihood of significant environmental effects arising from its development.

3.4 The area in which the proposed development is located is already heavily urbanized and therefore the development would not have ‘significant urbanising effects’, as outlined in the PPG. The impact of the development is not considered likely to give rise to markedly different impacts when taking into consideration the urban nature of the location with buildings of similar height neighbouring the site (or coming forward), which mostly comprise residential and commercial uses.

3.5 It is considered that any impacts associated with the construction and operation of the proposed development will be confined to the site and the land in the immediate vicinity. Residents and commercial occupiers adjacent to the site will be temporarily affected by the proposed development for a short period of time during the construction phase. However adverse effects will be minimised through the implementation of a CEMP and it is not considered that there will be any significant effects.

3.6 Once operational, the proposed development, which is taller relative to the existing land uses on site, will have long term (although potentially reversible) effects in regards to its physical existence on the land and its presence in both short term and long term views to the site. It is considered that the change in land use will result in an increase to the prosperity of the area, providing housing, employment and community opportunities.

3.7 The evidence presented in this Screening Appraisal demonstrates that there is no reasonable likelihood of significant environmental effects arising from either the future construction or operation of the proposed development, provided that conventional and proportionate planning controls are imposed upon such development. Accordingly, with reference to the EIA Regulations and accompanying Government guidance, we believe that the Council should conclude that a formal EIA is not required in this instance.