

Appendix 1.2 Consultation Undertaken

Source of comment	Stakeholder	EIA Discipline	Comment	Response
Planning reference 17/AP/1539, 23 rd June 2017 Scoping opinion on Air Quality	LBS	Air Quality	<p>27 Southwark's Environmental Protection Team (EPT) welcome the commitment in 7.3.13 to discuss detailed aspects of the methodology with officers. Officers have stated that the methodology for the air quality assessment needs to be revised such that the background pollutant levels are taken from the London Atmospheric Emissions Inventory 2013 since this is more accurate and up-to-date than the DEFRA maps. They further advise that the 2014 data should be avoided for verification purposes because this is considered to be an anomalous year with lower than average pollutant concentrations. Officers also request that London City Airport weather data is used in modelling rather than Gatwick or Heathrow. During the operational phase, the assessment should consider the dispersion of gases and/or odours linked to potential commercial uses such as restaurants and design these into the structure at an early stage.</p> <p>28 Natural England highlight that a priority action in the England Biodiversity Strategy is to reduce the air pollution impacts on biodiversity and that the EIA should take account of the risks of air pollution and how they can be managed and/or reduced to this end. They advise that further information about the impacts of poor air quality of different habitats can be found on the Air Pollution Information System (www.apis.ac.uk). “</p>	<p>The methodology for the air quality assessment is as follows:</p> <ul style="list-style-type: none"> ■ The Defra background data is consistent with the Emissions Factor Toolkit used to calculate the pollutants emission rates and, therefore, these data need to be used in the assessment. However, the Defra backgrounds were adjusted using the local 2016 monitoring results from the urban background air quality monitoring station at Elephant & Castle (Appendix 8.4). This approach is considered more accurate and up-to-date than the London Atmospheric Emissions Inventory which has modelled concentrations for 2013. ■ 2016 Monitoring data from Old Kent Road Automatic Station was used to verify the model. ■ The windroses used represent the 2016 weather data for London City Airport (right) and Heathrow Airport (left). London City Airport weather

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				<p>monitoring station is influenced by nearby buildings with significant height, which affects the data that is collected and results in a visible south westerly predominant wind direction. The London City Airport weather data are, therefore, constrained and not considered representative of the variety of winds affecting London. Data from Heathrow Airport has, therefore, been used for this assessment. Additionally, the Energy Centre maximum concentrations were predicted using Heathrow Airport meteorological data.</p> <ul style="list-style-type: none"> ■ DEFRA guidance on control of odour and noise from commercial kitchen exhaust (2005) provides clear guidance on best practice for the minimisation of odour and noise nuisance from kitchen exhaust systems. It aims to ensure that Proposed Developments have adequate ventilation systems that will not lead to complaints from neighbouring properties about cooking smells or noise from equipment such as fan motors. This guidance includes the relevant details to be incorporated into planning applications to ensure that such problems are unlikely to occur.

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				<p>However, odour nuisance from commercial kitchens depends on several factors, such as the cooking facility and appliances, and the type of food prepared. These factors can only be assessed once the occupant of the commercial space is known. Therefore, the odour control measures can only be specified during reserved matters and can adequately be controlled via a condition.</p> <p>Increase in traffic as a result of the development is not significant and therefore the development will not have a significant effect on biodiversity.</p>
<p>2017 ES consultation response</p>	<p>Historic England</p>	<p>Cultural Heritage; TVIA</p>	<p>Historic England’s Advice</p> <p>Historic England provided advice to your Council on this proposed scheme at scoping stage, and I attach a copy of our letter for your information. As you will note, we advised that a full visual assessment is provided with the application which takes into account a wide range of designated heritage asset. This assessment has now been provided in the submitted TVIA Report (Appendix 12.5 Par 2 - Accurate Visualisation Representations, PBA, 11/07/17).</p> <p>This study demonstrates that the proposed masterplan would result in a major change to the surrounding townscape, which we consider would have a harmful impact on the setting of a multitude of heritage assets, particularly those in the local</p>	<p>The Heritage Desk-Based Assessment, as well as Archaeology and Cultural Heritage Chapter of the 2017 ES (prepared by Cotswold Archaeology) included detailed settings assessment with regard to designated heritage assets which are likely to be considered sensitive receptors with regard to the scheme, and the considered assets included Listed Buildings as well as Conservation Areas.</p> <p>The three Conservation Areas mentioned in HE response (Cobourg Road, Glengall Road and Caroline Gardens) were subject to such detailed assessment and the visualisations included in the TVIA report have been utilised and the assessment was carried out using Historic England guidance. The DBA and ES chapter</p>

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			<p>vicinity. I address these in turn below:</p> <p><u>Cobourg Road Conservation Area</u></p> <p>Cobourg Road is a small conservation area with a residential character comprising of Georgian town houses, many of which are Grade II listed, as well as Victorian terraces. These exemplify the many terraces which were destroyed and cleared following WWII in what is now known as Burgess Park. These tree-lined houses alongside the Grade II listed former Church of St Mark (now the New Peckham Mosque) and the Cobourg Primary School form an attractive and somewhat picturesque composition in views across the lake within the Park.</p> <p>Despite some visibility of distant towers along the Old Kent Road, certain views from the Park towards the Conservation Area remain relatively unspoilt. This is represented in VP03 of the TVIA Report (p8-9). The wireline assessment demonstrates that the proposed masterplan development would rise substantially above the existing tree and roofline resulting in a dominant intrusion on the skyline. This, in our opinion, would undermine the attractive and picturesque qualities of the conservation area in views from Burgess Park, and therefore cause harm to the character of the Conservation Area, and to the setting of the Grade II listed townhouses in this particular view.</p> <p><u>Glengall Road Conservation Area</u></p> <p>Glengall Road also survived WWII damage, and is almost entirely characterised by pairs of Grade II listed stuccoed villas dating from c1843-1845.</p>	<p>have concluded there will be impacts upon the <i>heritage</i> significance of these designated heritage assets and such impacts have been discussed in relevant planning policy and legislative context (incl. NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990). the conclusion of the report corresponds with the HE advice, i.e. the harm would be less than substantial.</p> <p>As such it is considered that comments relating to these heritage assets have been adequately addressed within the 2017 application and these will be considered in the same way in the 2018 application.</p> <p>With regard to the ‘distant heritage assets’, HE make reference to the London View Management Framework, which includes numerous views of designated heritage assets as London’s major Landmarks. Due to the lack of significant impact on Nunhead Cemetery identified by HE, and the significant distance of the site from the other mentioned views (the scheme falls behind the rear boundary of Background Wider Setting Consultation Area of the LVMF views (~1.3km behind).</p> <p>Further information in regards to these distant heritage assets is supplied with the TVIA and Heritage Chapters of the 2018 ES.</p>

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			<p>Glengall Terrace, also within the Conservation Area, contains a contemporary Grade II listed stuccoed terrace along the south side of the street.</p> <p>Again, whilst some large residential and commercial buildings around the Old Kent Road are visible in certain locations within the Conservation Area, both Glengall Road and Glengall Terrace retain their historic roofline without significant obstruction in streetscape views. This is clearly demonstrated in VP07.</p> <p>The wireline and rendered visuals provided reveal that the proposed masterplan, and particularly the tower subject to detailed planning permission, would break the unobstructed roofline at the corner of Glengall Road and Glengall Terrace which would detract from the historic streetscape. We conclude that this impact would constitute harm to both the character of the Conservation Area and the setting of these Grade II listed houses.</p> <p><u>Caroline Gardens Conservation Area</u></p> <p>Caroline Gardens is an extensive Grade II listed almshouse complex dating from 1827-33 and is arranged in a grand orthogonal plan. The planned geometric arrangement of buildings evoke a stately character and provide the Conservation Area with a relatively enclosed setting. Despite this, a number of tower blocks are visible from the forecourt area, in particularly the Ledbury Estate buildings.</p> <p>View 09 (p24-25) from the Caroline Gardens Conservation Area demonstrates this existing visual impact at the corner of the central and north range of the almshouse complex. The overlaid</p>	

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			<p>wireline and rendered visualisation indicates that this impact would be significantly exacerbated by the proposed masterplan development. We consider that this cumulative impact would further detract from the formal orthogonal plan and enclosed setting of Caroline Gardens, and therefore cause harm to the character of the Conservation Area and the setting of the Grade II listed almshouse buildings.</p> <p><u>Distant Heritage Assets</u></p> <p>As we recommended, views of the proposed development from the Grade II* listed Nunhead Cemetery have been provided (VP16, p42-43). The study indicates that the proposed development would be well screened by trees, and it therefore appears unlikely that there would be a significant impact on the setting of the Cemetery and its visual relationship with St Paul’s Cathedral.</p> <p>Despite our recommendation at scoping stage, it does not appear that any assessment of the LVMF views from Parliament Hill and Kenwood House towards Central London (LVMF Views 2 and 3) have been provided. Although the development site is some distance away, we continue to recommend that a basic wireline assessment is undertaken to identify whether there would be any significant visibility from these designated strategic views.</p> <p>Historic England’s Recommendation</p> <p>We note that the Area Action Plan for the Old Kent Road remains at draft stage. As expressed as scoping stage, we continue to recommend that any tall building proposal within the Old Kent Road area</p>	

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			<p>is informed by a clear strategy, taking into consideration the existing townscape character and its heritage interest, to prevent development which could cause serious harm to the historic environment across the Borough and beyond. Historic England is therefore disappointed that these proposals have been submitted in advance of any adopted policy for development within this part of Southwark.</p> <p>Nonetheless, taking this hybrid application into consideration on its own merits, we would conclude that the proposed development would cause a significant amount of harm to the conservation areas and listed buildings set out in this letter. Whilst we do not consider the level of harm to any individual designated heritage asset to be 'substantial' in NPPF terms, the cumulative impact of the development on the wide range of designations in the vicinity is of much concern to Historic England.</p> <p>Regarding the proposed tower subject to detailed planning permission, the supporting visual information indicates that it would appear relatively isolated in a number of key views, and would therefore not appear to form a coherent part of the proposed masterplan development. It is important to note that in all three views in which we have identified harm, the impact of the proposed masterplan development represents a significant departure from the more modest scale of the Old Kent Road Local Development Study massing (outlined in green). This apparent lack of a coherent masterplan, and departure from the</p>	

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			<p>emerging strategy, is of much concern to us.</p> <p>In determining this application, we would remind your Council of your duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special regard to the desirability of preserving listing buildings including their setting (Section 66) and preserving or enhancing the character of conservation areas (Section 72). In our view, this scheme fails to preserve both the setting of the listed buildings and the character of the conservation areas identified in this letter, and we therefore recommend that this application is refused.</p>	
2017 ES consultation response	London Borough of Southwark	Hydrology and Flood Risk	<p>“We recommend that a Flood Warning and Evacuation Plan is submitted to Southwark’s Emergency Planning Department prior to occupation of the site, this should specifically include details of how occupants should be made aware of and how they should go about signing up to Environment Agency Flood Warnings, this can be conditioned and does not need to be submitted at this stage in the planning process.”</p>	<p>This recommendation was included within the submitted Flood Risk Assessment, whereby a Flood Risk Management Plan was proposed. This would include the details requested by LBS.</p>
2017 ES consultation response	London Borough of Southwark	Hydrology and Flood Risk	<p>“We are pleased to note in the Design and Access Statement that the applicant intends to submit a Basement Impact Assessment (BIA), please note that Southwark’s guidance on BIAs has recently been updated, the update can be found in appendix to Southwark’s SFRA (2016) ...”</p>	<p>Noted.</p>
2017 ES consultation response	London Borough of	Hydrology and Flood Risk	<p>“The Drainage Strategy should as far as possible aim to reduce surface water runoff from the site to</p>	<p>Noted and incorporated within the Drainage Strategy – see Appendix 10.1.</p>

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	Southwark		the greenfield runoff rate for the 1 year Return Period (RP), and 100 year RP critical duration storm plus the Environment Agency upper end allocation for climate change which is currently 40%, and any attenuation structures designed to accommodate the associated volumes. Where drainage strategies refer to 50% betterment, Southwark require that they reduce surface water runoff from the site from the 100 year RP critical storm down to 50% of the 1 year RP critical storm, with a minimum of 5l/s for connections to the sewer network ...”	
2017 ES consultation response	London Borough of Southwark	Hydrology and Flood Risk	“We note in section 3.1.2 of the Environmental Statement that 1.04ha of the site is currently at detailed stage. A drainage strategy for this part of the site should therefore be approved by the Local Planning Authority.”	Noted.
2017 ES consultation response	Environment Agency	Hydrology and Flood Risk	“We have no objections to the planning application as submitted”	Noted.
2017 ES Consultation Response	LB Southwark	Socio-economic	<p>Health Impact Assessment Recommend that the Applicant carries out a Health Impact Assessment (HIA) of the proposed development for the following reasons:</p> <ul style="list-style-type: none"> ▪ A Health Impact Assessment will assist the Applicant in identifying important aspects of the masterplan and building design that can have an impact on health, together with future health, education and open space needs. Many of the development features, such as increased and better 	The likely significant effects of the affordable housing provision will be re-assessed in the Socio-Economic Chapter of the 2018 ES.

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			<p>access to open green space, play spaces and increased walkability/cycling infrastructure will have a positive effect on health, and a Health Impact Assessment will assist in gathering all these beneficial effects in one single and accessible document</p> <ul style="list-style-type: none"> ■ The emerging New Southwark Plan, now in its Preferred Option version, will require any development over 500 homes or 25,000 sqm of commercial space to submit a HIA as part of the application process ■ The size of the development meets the recommended 'size of development' criteria for an HIA as proposed by HUDU and the London Plan in best practice guidance <p>Public Health welcomes the opportunity to advise on the scoping for the HIA and would like to refer the applicant to HUDU's rapid Health Impact Assessment tool.</p> <p>Affordable Housing The proposed proportion of Affordable Housing is only 20% across the development. This is 15% below the minimum amount of Affordable Housing required by the Council (35%) in both the emerging New Southwark Plan and the Old Kent Road AAP. The shortage of affordable housing in the area is a</p>	

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			<p>serious issue that has repercussions on health. The lack of truly affordable housing impacts on all aspects of life, including being pushed to move to lower quality housing, or deterred away from places with better jobs and earning prospects, because these are the more expensive places to live. Unaffordable housing increases reliance on housing benefits depresses living standards and can link to overcrowding. The correlation between overcrowding and poor physical and mental health, poor educational attainment and disturbed sleep is well documented. Is therefore essential that the 35% affordable housing requirement is met</p> <p>Tenure Blind With regards to the affordable section of the residential development, I could not find any confirmation that the external appearance of the residential blocks will be tenure blind and that there will not be separate entrances for affordable tenants. Public Health recommends a requirement for development to be tenure blind with equal access to services and facilities and no separate entrances for the affordable section of the development. This will reduce the risk of real and perceived community severance, and will comply with DM 11 of the emerging New Southwark Plan concerning Residential Design</p>	
N/A	N/A	Socio-economic	N/A	Any likely significant effects on local employment as a result of the 2018 Application Scheme is re-assessed in the Socio-Economic Chapter of the 2018 ES and the amended

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				Employment Report.
2017 ES Consultation Response	Public consultation response	Socio-economic	35 comments were received from members of the public objecting to the fact the proposed scheme would not meet the requirement of Southwark's affordable housing policy.	The likely significant effects of the affordable housing provision will be re-assessed in the Socio-Economic Chapter of the 2018 ES.
2017 ES Consultation Response	Public consultation response	Socio-economic	5 comments were received from members of the public stating that insufficient community infrastructure (schools, GP surgeries, public open space) was proposed by the scheme.	The likely significant effects of the 2018 Application Scheme on existing community infrastructure has been assessed in the Socio-Economic Chapter of the 2018 ES.
Feedback on pre-application pack 2016	TfL	Transport	Comments relate to the masterplan, the transport assessment, connectivity – road and pedestrian/cycle route network (internal and external), car parking and car trip generation, cycle parking and cycle hire, public transport and trip generation, Deliveries and servicing, Travel Plan, Construction and Section 106 and Community Infrastructure Levy	The points addressed within the 2018 Amended Application.
Feedback on application submission 2017	TfL	Transport	Comments relate to walking, cycling and public realm, cycle parking, car parking, trip generation, mode split, distribution and assignment, bus impacts, rail impacts, Travel Plan, Deliveries and Servicing and Construction.	Meeting held with TfL in March 2018 to address comments. Subsequent meeting held in August 2018 prior to submission to address points raised.
2017 Scoping Report	LBS	Landscape	Para 39: “The baseline information referenced in section 7.7.7 should also include the Southwark Historic Assets Register, as published on the website and including the linked Historic England databases, and the applicant's own assessment of any historic structures on the site.”	This comment is addressed in the TVIA and Heritage Chapters of the 2018 ES.

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			Para 40: “The scope of assessment, as defined in 7.7.11, should include a further criterion to explicitly reference the potential effect(s) on designated heritage assets. Further to this, Section 7.7.16 should include a linked criterion to stating: “key viewpoints where the setting of a designated heritage asset is appreciated”.	This comment is addressed in the TVIA and Heritage Chapters of the 2018 ES.
	LBS	Landscape	Para 41: “Section 7.7.17 should include the Thorburn Square Conservation Area as a potential visual receptor and the following listed buildings: Caroline Gardens Almshouses comprising a large group of Grade II listed buildings including the Licensed Victualler’s Chapel; 1-50 Clifton Crescent; 2-7 Canal Grove; Livesey Museum, Old Kent Road; Grade II listed group on Glengall Road; Grade II listed group on Trafalgar Avenue; Grade II listed group on Cobourg Road.”	Note that Thorburn Square is identified in the scoped-out viewpoints (Table 7.3) in the Scoping Report for the TVIA as being unlikely to have views from street level. This comment is addressed in the TVIA and Heritage Chapters of the 2018 ES.
	LBS	Landscape	Para 42: “The listed views (in Table 7.3) have been generally scoped and are based on the initial proposals that were reviewed by officers in August 2016, though the results of this views analysis is yet to be presented to officers. However, the indicative description of development presented at this stage suggests a potentially significant increase in the scale of development proposed and, as a consequence, further views may be	Table 7.3 contains the “scoped out” views / viewpoints. PBA assume that the comment is made with regards to a change in the increase in scheme size relates to a tall building 120m height that was considered when we presented the viewpoint selection report in August 2016, and that now the scheme’s tallest building is 138m height.

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			<i>necessary.”</i>	<p>PBA have reviewed the 138m height tall building in the ZTV plan and the visual impact assessment which utilises AVRs (visualisations) prepared by Rockhunter. PBA consider that the scoped-out viewpoints and views remain as set out in Table 7.3</p> <p>This comment is addressed in the TVIA and Heritage Chapters of the 2018 ES.</p>
	LBS	Landscape	<p>Para 43: <i>“It is acknowledged that the Zone of Theoretical Visual Influence (ZTV) for the proposal is to be established to inform the wider Townscape Visual Impact Assessment. Once the development has reached the ‘design freeze’ stage, the council will require a scaled 3D model to assist in understanding the visual impacts of the proposal within its context, including its potential cumulative impacts with other major developments in the vicinity.”</i></p>	<p>The ZTV plan is included in the TVIA supporting plans. The ZTV plan, together with the AVRs (visualisations) by Rockhunter have informed the visual impact assessment for the TVIA.</p> <p>The 3D model is not part of the TVIA, though it has of course been used in Rockhunter’s visualisations which PBA have used to inform the visual impact assessment.</p> <p>This comment is addressed in the TVIA and Heritage Chapters of the 2018 ES.</p>
			<p>Para 44: <i>“Section 7.7.42 should acknowledge that the impact of the proposal needs to be considered cumulatively together with any other consented schemes as well as both the maximum and minimum parameters that will be established as part of the outline element”</i></p>	<p>The TVIA includes a cumulative assessment section in accordance with the project’s ES structure.</p> <p>This comment is addressed in the TVIA and Heritage Chapters of the 2018 ES.</p>
	LBS	Landscape	<p>Para 45: <i>“It is important that the primary mitigation measures referenced in Section 7.7.49</i></p>	<p>The Planning Statement sets out the iterative design process. The Planning Statement, the</p>

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			<i>should include adjustment(s) in height, scale, massing and/or arrangement of the proposed development through an iterative process in order to avoid harmful impacts on designated heritage assets and their settings.”</i>	<p>Design Principles Document, the DAS and the Parameter Plans set out the design approach to the proposed development. The iterative design process forms part of the primary (embedded) mitigation text in the TVIA.</p> <p>The Council’s comment with regards to avoiding harmful impacts is addressed in the Heritage Chapters of the 2018 ES.</p>
Comments on 2017 Application	Historic England	Landscape	<p>Historic England <i>We note that the Area Action Plan for the Old Kent Road remains at draft stage. As expressed as scoping stage, we continue to recommend that any tall building proposal within the Old Kent Road area is informed by a clear strategy, taking into consideration the existing townscape character and its heritage interest, to prevent development which could cause serious harm to the historic environment across the Borough and beyond. Historic England is therefore disappointed that these proposals have been submitted in advance of any adopted policy for development within this part of Southwark.</i></p> <p><i>Nonetheless, taking this hybrid application into consideration on its own merits, we would conclude that the proposed development would cause a significant amount of harm to the conservation areas and listed buildings set out in this letter. Whilst we do not consider the level of harm to any individual designated heritage asset to be ‘substantial’ in NPPF terms, the cumulative impact of the development on the wide range of</i></p>	<p>The proposal has been developed with regard to the current version of The Old Kent Road Area Action Plan / Opportunity Area Framework (Further Preferred Option, Dec 2017).</p> <p>Preferred option Policy AAP8 considers tall buildings over 30m ‘appropriate within the core area’,</p> <p>The policy requires the location of tall buildings to reinforce hierarchy of streets and spaces, and the provision of public space at ground level which is ‘proportionate to the height of the building’. The policy states: ‘Proposals for tall buildings should demonstrate a considered relationship with other tall buildings and building heights in the immediate context and contribute towards creating a coherent, legible and well-articulated townscape. Cumulatively, tall buildings should not coalesce visually to form a single mass... ‘In addition, tall buildings which are significantly higher than the existing contextual height of tall buildings (around 20 storeys) must demonstrate that they contribute positively to London’s skyline, when viewed</p>

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			<p><i>designations in the vicinity is of much concern to Historic England.</i></p> <p><i>Regarding the proposed tower subject to detailed planning permission, the supporting visual information indicates that it would appear relatively isolated in a number of key views, and would therefore not appear to form a coherent part of the proposed masterplan development. It is important to note that in all three views in which we have identified harm, the impact of the proposed masterplan development represents a significant departure from the more modest scale of the Old Kent Road Local Development Study massing (outlined in green). This apparent lack of a coherent masterplan, and departure from the emerging strategy, is of much concern to us.</i></p> <p><i>In our view, this scheme fails to preserve both the setting of the listed buildings and the character of the conservation areas identified in this letter, and we therefore recommend that this application is refused.</i></p>	<p><i>locally and in wider views and that they make an exceptional contribution to the regeneration of the area.'</i></p> <p>This comment is addressed in the TVIA and Heritage Chapters of the 2018 ES.</p>