

**Infrastructure & Environment**

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Our Ref: WIB14596-102.170619.NP  
Your Ref: 16/AP/4458

Date: 19 June 2017

Southwark Council  
Development Management  
PO Box 64529  
London  
SE1P 5LX

For the Attention Of: Victoria Lewis

RE: **Application Reference Number 16/AP/4458: Elephant & Castle Town Centre, London Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended 2015) (EIA Regulations): EIA Implications of the Proposed Amendments**

## 1. Background

In October 2016 Elephant & Castle Properties Co. Limited (hereafter referred to as the 'Applicant') submitted a detailed planning application (ref: 16/AP/4458) for the proposed Elephant & Castle development (hereafter referred to as the 'Proposed Development'). An Environmental Statement (ES) prepared by Waterman Infrastructure & Environment Ltd accompanied the planning application.

## 2. Reasons for this Letter

This letter has been prepared by Waterman IE to provide clarification in relation to minor amendments which have been made to the Proposed Development and to allow re-consultation to take place with Southwark Council prior to determination of the planning application.

This letter seeks to establish what (if any) EIA implications arise out of the minor amendments to the Proposed Development (refer to Section 3 of this letter). Specifically, this letter addresses the following questions:

- do the proposed amendments give rise to any new, additional or different likely significant environmental effects to those which have been identified and reported within the ES?
- would the existing ES remain valid in light of the proposed amendments?
- do the proposed amendments necessitate the need for any further EIA assessment?

## 3. Amendments to the Proposed Development

The proposed amendments relate to design development which has been undertaken by Allies and Morrison since the submission of the planning application in October 2016. A summary of the proposed amendments is set out below, with further details included within the Design and Access Statement Addendum prepared by Allies and Morrison and submitted as part of the package of information submitted to Southwark Council for re-consultation.

### ***East Site – The Western Arches***

- opening of the southern length of the Western Arches (adjacent to building E3) to pedestrian movement to provide a north-south link from Walworth Road to the Court;

### ***East Site – Basement***

- omission of 13 car parking bays associated with the residential accommodation;
- revision to the proposed mix of cycle parking stands; and
- provision of a Police Office to be located within the basement.

### ***East Site - Park Route***

- reconsideration of the landscape planting to the Elephant and Castle entrance to the Park Route, with the omission of one of the three planters (13.3m<sup>2</sup>) and the omission of bench seating from the remaining two planters; and
- all short stay cycle stands being relocated from Elephant and Castle to the Park Route and the southern end of the Western Arches although they remain wholly within the public realm as reported in the ES.

### ***East Site – Building E4***

- set back of the north-west building line of Building E4 to the Station Route by 4.5m at ground floor level; and
- reduction in the area of retail floorspace at ground floor level of approximately 25m<sup>2</sup> Gross External Area.

### ***West Site – Cultural Venue***

- change in building facades from Corten Steel to a cast stone material; and
- relocation of the main entrance to the north of the building.

## **4. Implications for all Environmental Topics Considered within the Environmental Statement**

### ***Socio Economics***

The amendments to the Proposed Development would not give rise to any new, additional or different likely significant effects on socio-economics to those which have already been identified and reported within the ES. This is because:

- the reduction in retail floorspace is minimal and would not lead to a change in the conclusion on the significance of employment generation during the operational phase of the Proposed Development;
- there are no changes proposed to the quantum of residential units, open space or playspace within the Proposed Development; and
- there are no changes proposed to the logistics, duration or method of demolition and construction.

As such, the conclusions of the ES in relation to socio economics effects remain valid.

### ***Transportation***

The amendments to the Proposed Development would not give rise to any new, additional or different likely significant effects on transportation to those which have already been identified and reported within the ES. This is because:

- the reduction in the small number of car parking spaces proposed and the reduction in retail floorspace would be likely to lead to a marginal reduction in the quantum of vehicular trips generated by the Proposed Development but as no disruption to the operational road network around the Site was predicted, the significance of the effect of would remain as reported in the ES, i.e. insignificant;

- the predicted trip generation for other modes of transport is unlikely to be affected by the marginal reduction in retail accommodation;
- there is no change proposed to the location of uses within the Development or vehicular, pedestrian access or circulation, or cycle parking numbers; and
- there are no changes proposed to the logistics, duration or method of demolition and construction.

As such, the conclusions of the ES in relation to transportation effects remain valid.

It should be noted that WSP are providing a separate Addendum to their Transport Assessment to reflect the updated amendments to the Proposed Development as outlined above.

### ***Noise and Vibration***

The amendments to the Proposed Development would not give rise to any new, additional or different likely significant effects on noise and vibration to those which have already been identified and reported within the ES. This is because:

- the reduction in the small number of car parking spaces proposed and the reduction in retail floorspace would be likely to lead to a marginal reduction in the quantum of vehicular trips generated by the Proposed Development but as no significant traffic noise during the operational phase was predicted, the significance of the effect would remain as reported in the ES, i.e. insignificant;
- there are no changes proposed to the location of uses, private amenity space, open space or plant rooms within the Proposed Development;
- there is no change proposed to the location of vehicular access or circulation; and
- there are no changes proposed to the logistics, duration or method of demolition and construction.

As such, the conclusions of the ES in relation to noise and vibration effects remain valid.

### ***Air Quality***

The amendments to the Proposed Development would not give rise to any new, additional or different likely significant effects on air quality to those which have already been identified and reported within the ES. This is because:

- the reduction in the small number of car parking spaces proposed and the reduction in retail floorspace would be likely to lead to a marginal reduction in the quantum of vehicular trips generated by the Proposed Development but as no significant effects on air quality from traffic during the operational phase were predicted, the significance would remain as reported in the ES, i.e. insignificant;
- there is no change proposed to the location of uses, vehicular access or circulation; and
- there are no changes proposed to the logistics, duration or method of demolition and construction.

As such, the conclusions of the ES in relation to air quality effects remain valid.

### ***Ground Conditions and Contamination***

The amendments to the Proposed Development would not give rise to any new, additional or different likely significant effects on ground conditions and contamination to those which have already been identified and reported within the ES. This is because:

- there are no changes proposed to the location of uses, private amenity space, open space or landscaping within the Proposed Development;
- there is no change proposed to the extent and volume of basements or below ground works and structures;

- there are no changes proposed to the logistics, duration or method of demolition and construction.

As such, the conclusions of the ES in relation to ground conditions and contamination effects remain valid.

### ***Flood Risk and Drainage***

The amendments to the Proposed Development would not give rise to any new, additional or different likely significant effects on flood risk and drainage to those which have already been identified and reported within the ES. This is because:

- there is no change proposed to the surface water drainage strategy;
- there are no changes proposed to the location of uses or finished floor levels within the Proposed Development;
- the marginal reduction in retail floorspace is unlikely to affect the calculation of foul water discharge or water supply required for the Proposed Development and there would be no change to the conclusion of the significance of effect on capacity of infrastructure in relation to these reported in the ES i.e. insignificant.
- there is no change proposed to the extent and volume of basements or below ground works and structures;
- there are no changes proposed to the logistics, duration or method of demolition and construction.

As such, the conclusions of the ES in relation to flood risk and drainage effects remain valid.

### ***Archaeology***

The amendments to the Proposed Development would not give rise to any new, additional or different likely significant effects on archaeology to those which have already been identified and reported within the ES. This is because:

- there is no change proposed to the extent and volume of basements or below ground works and structures;
- there are no changes proposed to the logistics, duration or method of demolition and construction.

As such, the conclusions of the ES in relation to archaeology effects remain valid.

### ***Wind***

RWDI has qualitatively considered the proposed amendments and has confirmed that they would not give rise to any new, additional or different likely significant effects on wind microclimate to those which have already been identified and reported within the ES. This is because:

- although there is a small change proposed to the massing of Building E4 (reduction in building line to north-west corner of 4.5m), this is not considered to result in significantly different wind conditions given the sheltered location in respect to the surrounding built form. The wind conditions in the area are already suitable for sitting in the windiest season and there would be likely to be a slight improvement in wind conditions if anything as the set back of the building (and effective chamfer of the building corner) would mean wind would be less likely to channel through the route. Wind effects on pedestrian comfort would therefore remain as reported in the ES, i.e. be insignificant;
- the change to the material of the façade of the Cultural Venue on the West Site and the removal of one landscape planter on the East Site would not affect the results of the assessment of wind microclimate reported within the ES;

- the relocation of the main entrance to the north of the Cultural Venue building would result in wind conditions suitable for its intended use (see Location 315 shown in Figure 14.5 of the ES) as reported in the ES for the original entrance location;
- the opening up of the Western Arches route from Walworth Road (behind Building E3) would result in wind conditions suitable for its intended use (see Location 41 shown in Figure 14.5 of the ES) as reported in the ES for the original location;
- there are no changes proposed to the logistics, duration or method of demolition and construction.

As such, the conclusions of the ES in relation to wind micorclimate effects remain valid.

### ***Daylight, Sunlight, Overshadowing and Solar Glare***

GIA have qualitatively considered the proposed amendments and have confirmed that they would not give rise to any new, additional or different likely significant daylight, sunlight, overshadowing or solar glare effects to those which have already been identified and reported within the ES. This is because:

- although there is a small change proposed to the massing of Building E4 (reduction in building line to north-west corner of 4.5m), this is not considered to result in any change to the daylight, sunlight and overshadowing assessment given that the massing change is at ground floor level only;
- there are no changes proposed to the location or internal layout of residential units within the Proposed Development;
- the change to the material of the façade of the Cultural Venue is not considered to affect the assessment of solar glare; and
- there are no changes proposed to the logistics, duration or method of demolition and construction.

As such, the conclusions of the ES in relation to daylight, sunlight, overshadowing and solar glare effects remain valid.

### ***Townscape, Visual and Built Heritage***

Professor Robert Tavernor Consultancy has qualitatively considered the proposed amendments to the Proposed Development and has confirmed that they would not give rise to any new, additional or different likely significant effects on townscape, visual and built heritage to those which have already been identified and reported within the ES. This is because:

- the overall architectural impression remains the same as that described in the ES for the Proposed Development;
- although there is a change to the massing of Building E4 (reduction in building line to north-west corner of 4.5m), it is considered that the conclusions of the assessment of the effect of the Development as a whole on townscape character remain as reported in the ES. The building is well contained within the Site so there would be no change to the assessment of effect on relevant local views;
- although the change to the façade material of the Cultural Venue may result in minor changes to the rendered visualisations provided as part of the assessment of key local views towards the Site, these are not considered to effect the conclusions reached in terms of the magnitude of change or the nature and significance of visual effects on local, mid-distance or distant views;
- the change to the façade material of the Cultural Venue is not considered to affect the conclusions of the assessment of the effect on the setting of the Grade II listed Metropolitan Tabernacle heritage asset in terms of the magnitude of change or the nature and significance of effect; and
- there are no changes proposed to the logistics, duration or method of demolition and construction.

As such, the conclusions of the ES in relation to effects on townscape, visual amenity and built heritage remain valid.

## **5. Conclusion**

Section 4 of this letter demonstrates that the proposed amendments would not give rise to any new, additional or different likely significant effects to those already considered within the ES. Accordingly, the assessment of cumulative effects (which was based upon all technical assessments scoped into the EIA) would also remain as stated within the ES.

In view of the above, it is considered that the ES remains applicable and valid and that there is no requirement for any further or supplementary ES in relation to the proposed amendments.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Neil Purvis', written in a cursive style.

Neil Purvis  
Senior Consultant  
For and On Behalf of Waterman Infrastructure & Environment Ltd