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Review of Waterman Response to February 2019 Review Report to the Canada Water Masterplan scheme

Review Report V4

Prepared by LUC in association with Ricardo Environment and Xi Engineering

May 2019



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Prepared by LUC in association with Sub Consultants

May 2019

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1 Introduction

Review of the 2017 ES and October 2018 ES Addendum

- 1.1 LUC in association with Clewlow Consulting, Ricardo Energy and Environment, Delva Patman Redler and Xi Engineering Consultants Limited were commissioned by London Borough of Southwark (LBS) to provide a critical review of the Environmental Statement submitted in May 2018 (the 'original 2018 ES') for the residential led, mixed use redevelopment ('the Proposed Development') of a site in Canada Water. LUC's Final Review Report was submitted to LBS in September 2018. The updated FRR was submitted to LBS in November 2018. LUC also reviewed amendments to the scheme (in the form of an ES Addendum (ESA)) in October 2018 which the applicant responded to in February 2019 (this is covered in a separate review report).

The Amended Proposed Development

- 1.2 LUC has now been commissioned by the LBS to review further amendments to the Proposed Development (February 2019) which the Applicant is now proposing.
- 1.3 In summary, the proposed amendments (set out in Chapter 4 of the ES Statement of Conformity) comprise:

"OUTLINE PROPOSALS

An increase in the extent of basement beneath Development Zone L by 2.5m to a depth of -4.6m Ordnance Datum (OD) to allow sufficient depth for a potential primary substation in this location. The increase in depth is in line with the requirements set out by UK Power Network (UKPN).

DETAILED PROPOSALS

Plot A1

The following minor external and internal alterations are proposed:

- Minor alterations to the internal arrangement of the back-of-house areas at basement and ground floor levels;*
- Increase in internal residential amenity space at first floor level;*
- Minor adjustments to the internal levels of the loading bay, secondary office entrance and retail units facing the Dock Office Courtyard at ground floor level; and*
- Minor adjustments to the architectural detailing of the external elevations.*

Plot A2

The following minor external and internal alterations are proposed:

- Internal layout changes to the office entrance hall at ground floor level;*
- Reduction in the depth of planters at first-fifth floor levels and roof level;*
- The creation of an accessible enclosed roof terrace for office users at fifth floor level;*
- Minor changes to the east and north façades at ground floor level in relation to the entrance hall and retail frontages;*
- Minor alteration to the design of the leisure centre entrance canopy on the north elevation;*
- Slight increase in rooftop plant enclosure; and*

- *Change in materiality of the rear wing of the building from timber to terracotta to ensure compliance with Fire Regulations.*

Plot K1

Further detailed design work has been undertaken to ensure that the proposed eight wheelchair units meet the relevant South-East London Housing Partnership Wheelchair Housing Design Guide standards as prescribed in Southwark's Residential Design Standards SPD (as updated in 2015). As a result, minor internal layout alterations to the wheelchair units are proposed.

Interim Petrol Filling Station

The location of the underground fuel tanks beneath the forecourt have been relocated 11 metres to the north east of their previous position within the existing proposed boundary of the IPFS to enable future works to have less design restrictions. The number of tanks remains unchanged at 2 no.

The forecourt canopy structural columns have increased in diameter and height compared to the October 2018 submission to allow for future works to be carried out with minimal disruption to the IPFS operations. The columns are proposed to extend to a height of 5.75m above ground level compared to a previous height of 5.25m, but the canopy height will remain unchanged at 5.25m above ground level."

Review Report

- 1.4 This report sets out a review of the further proposed amendments to the development, with particular regard to the conclusions drawn from the ES Statement of Conformity Addendum Chapters 5 to 9.
- 1.5 The purpose of this report is to provide advice to the LBS regarding the suitability of the approach to handling the February 2019 Further Proposed Amendments in terms of EIA conformity and whether or not the conclusions of the May 2018 ES and October 2018 ES Addendum remain valid, or whether further information may be required for the purposes of Regulation 22 of the EIA regulations.
- 1.6 It should be noted that this report does not supersede the review report prepared for the submitted ES, nor the October 2018 ES Addendum and any clarifications and Regulation 22 requests raised in those reports remain valid.

Response to Waterman Response May 2019

- 1.7 In response to the LUC Review Report dated April 2019, the applicant's consultant Waterman have provided further clarification in relation to amend no.1-6 as detailed in the LUC report dated April 2019.
- 1.8 In response to the Waterman clarifications, LUC in association with their sub consultants have reviewed the Waterman responses and have provided further commentary in an updated **Table 2.1** in this report. Please note that a new column has been added to **Table 2.1** to provide clear and concise responses.

2 Review of Proposed Amendments

- 2.1 Chapter 5 of the ES Statement of Conformity report (Feb 2019) provides a summary as to whether the proposed amendments may lead to any new, additional or different likely significant environmental effects to those identified and reported in the Original May 2018 ES or October 2018 ES Addendum. More detailed assessment is provided for ground conditions and contamination, ecology, archaeology, and townscape, built heritage and visual impact.
- 2.2 The Chapter generally concludes that there would be no material difference in the likely significant environmental effects arising from the Amended Proposed Development and for most topics the conclusions of the May 2018 Original ES and October 2018 ES Addendum remain valid. Where appropriate, LUC's conclusions on this are detailed below with reference to each environmental topic area considered.

Demolition and Construction

- 2.3 Despite a minor increase in the total amount of material to be excavated due to the increase in the depth of the basement, the applicant's conclusion that the information in the May 2018 ES and October 2018 ES Addendum remains valid is acceptable.

Socio-Economics

- 2.4 There are minor changes proposed to the floor areas in Plot A1 and A2 however the applicant concludes that the information in the May 2018 ES and October 2018 ES Addendum remains valid. This is acceptable.

Transportation and Access

- 2.5 Since the October 2018 resubmission, further assessment work has taken place on two issues which are reported in the Transport Assessment (TA) Addendum submitted in support of the further planning submission (dated February 2019). The two issues are a reduction in the provision of residential parking and local highway modelling changes following a review of highway modelling by TfL and changes to the Masterplan.
- 2.6 In respect of residential parking, it is proposed that the overall provision of residential parking will be a maximum of 0.1 spaces per residential unit over the masterplan area, in accordance with adopted London Plan (Greater London Authority, 2016) guidance, compared to the previously proposed overall provision of 0.13 spaces per residential unit. It is considered that this change, which is welcomed in its objective of persuading more trips to be made by means other than the private car, will nevertheless not materially alter the findings of the EIA in respect of Transportation and Access.
- 2.7 In respect of the revisions made to the highway network which is the subject of the updated highway modelling, the most significant in environmental terms is the revised position that the High Street will be open to general traffic. As access through the High Street would not be restricted, it can be expected that there would be a greater level of through traffic than had been assumed at the time of the TA.
- 2.8 Another factor in the updated local highway modelling report is that the modelling does not take account of the reduced level of residential car parking provision or the potential reduction in car-borne trips that could therefore be expected, compared to those forecast in the TA. The updated

local highway modelling is therefore likely to be presenting a more onerous case for network performance than might arise in practice.

- 2.9 The updated local highway modelling shows a pattern of highway network performance in the morning and evening peak hours which is very similar to that presented in the May 2018 TA. As the assessment takes no account of the potential for car trips to reduce over time, whether as a consequence of initiatives, which will be taken by the Applicant or of wider travel trends, the outcomes are considered to be robust.
- 2.10 In relation to the above it can be reasonably concluded that the Proposed Amendments, with the total quantum and mix of uses effectively remaining unchanged and the proposed minor amendments of no substantive effect in transport terms, do not materially alter the findings of the Transportation and Access Chapter presented in the May 2018 ES and October 2018 ES Addendum and it therefore remains valid with regard to the Development.

Noise and Vibration

- 2.11 It is agreed that the proposed amendments to plots A1, A2, K1 and the IPFS would not change the location of mechanical plant associated with the development and there would be no change to traffic flows, thus operational impacts of noise and vibration would remain the same as assessed in the May 2018 ES and the October 18 ES Addendum.

Air Quality

- 2.12 The consultant has stated in the statement of conformity that, '*The proposed amendments would not alter the conclusions of the assessment and therefore it remains valid with regard to the development.*' We agree for the majority of scheme amendments, the only exception is the introduction of a work space on plot A2's roof terrace (section plot A2 of cover letter) and consideration should be given to the risk of exceedance at this location (see Amend 1).

Ground Conditions and Contamination

- 2.13 The scheme amendment that is relevant to Ground Conditions and Contamination is the increase of depth in the basement in development zone L from -2.1 m AOD to -4.6 m AOD. This is not considered to have a material effect on the results and conclusions of the ES or the October 2018 addendum, and the proposed mitigation is considered to be appropriate for this revised scheme, subject to the planning conditions previously identified.

Water Resources and Flood Risk

- 2.14 Chapter 4 of the CWM February 2019 Statement of Conformity gives further details on the increase of the basement depth by 2.5m to -4.6m AOD. With regards to Water Resources and Flood Risk this is the only notable change in the Statement of Conformity. Chapter 12 of the ES and Chapter 6 of the Statement of Conformity state the below ground water levels in the area of the development are situated below the maximum basement depth. With recorded groundwater levels ranging from 6.1m to 9.3m bgl, outside of the infilled docks. Therefore, the basements are not at a significant risk.
- 2.15 Chapter 5, table 1 of the CWM February 2019 Statement of Conformity indicates that there are no changes to the findings of conclusions drawn by the water resources and flood risk assessment as reported in Chapter 12, and Appendix 12.1: Flood Risk Assessment of the May 2018 ES. This statement is acceptable.
- 2.16 The proposed planning conditions relating to water resources and flood risk set out in the previous (October 2018) review remain unchanged.

Ecology

- 2.17 The further amendments, submitted as part of the February 2019 ES Addendum, are not considered to result in any material changes to the potential ecological impacts; and therefore the conclusions of the May 2018 ES and the October 2018 ES Addendum remain valid, in terms of ecology. This is acceptable.
- 2.18 An update of the assessment of the impacts of overshadowing from The Canada Water Masterplan and Plot K1 on the Russia Dock Woodland and Stave Hill Ecology Park Local Nature Reserve (LNR) has been provided in Appendix 1 of the Statement of Conformity, to take into account minor changes in baseline conditions (in particular the felling of a small number of trees within the LNR). The scope and method of baseline ecological data collection, GIA sunlight and overshadowing modelling and subsequent assessment of impacts have been completed by experienced and suitably qualified professionals, in line with relevant best practice guidance, including: the CIEEM Guidelines for Ecological Impact Assessment in the UK and Ireland (2016); and the CIEEM Guidelines for Preliminary Ecological Assessment (2015).
- 2.19 In Appendix 1, Section 3 of the Statement of Conformity, Waterman has also provided a detailed response to the comments received from Friends of Stave Hill and Friends of Russia Dock Woodland in January 2019. This response highlights the marginal and transient nature of the overshadowing on the LNR, which amounts to a reduction in sunlight of less than 10 hours per annum for the vast majority of the small area to be overshadowed. Waterman's response is considered to provide a proportionate, objective and scientific perspective on the ecological value of the LNR and the impacts that could result from overshadowing. The professional judgement that the LNR would not be significantly affected by transient overshadowing from the development is well reasoned, based on reliable data and is in line with best practice guidance; and therefore, we have no reason to disagree with their conclusions.

Archaeology (Buried Heritage)

- 2.20 A review of the proposed amendments and the effects in relation to archaeology has been undertaken by MOLA; the same specialists who undertook the original archaeology assessment. A new technical appendix is not provided but a summary of the findings is included in the Statement of Conformity (Table 1 and Section 8).
- 2.21 The review appropriately identifies that the proposed increase to the depth of the basement in Development Zone L from -2.1m OD to -4.6m OD has the potential to further impact archaeology. It is reported that the basement in this area is situated within the former dock ponds, which extends in to the natural geology and therefore will have removed all previous archaeological deposits. The original ES (Table 11.2) also indicates that geoarchaeological remains (e.g. alluvium and Kempton Park Gravels) were also anticipated as having been wholly removed by the docks.
- 2.22 However, the dock (i.e. surviving dock walls and associated infrastructure) is a heritage asset in itself. The previous (May 2018 - para 15.54) assessment identified that the remains of the dock (of medium – low significance) would be entirely removed, resulting in a high magnitude of change and a moderate effect (pre-mitigation). The proposed amendment would not alter this assessment finding. In terms of mitigation the applicant has stated in the Statement of Conformity (para 8.4) that the remains of the dock wall could be investigated during the excavation for proposed basements (i.e. once the perimeter walls have been inserted) and would need to be built into the construction programme. The strategy for this work will be developed in consultation with Southwark Council's archaeological officer.
- 2.23 The applicant also notes in the Statement of Conformity that geoarchaeological monitoring of geotechnical boreholes would be undertaken prior to the phased clearance of the site and demolition, in order to clarify the nature and depth of any in situ alluvium, which would help to refine understanding of the likely prehistoric potential in terms of gravel high zones and ancient channels and peat deposits (para 8.4).
- 2.24 The applicant concludes that the previous assessment findings remain valid for the proposed amendments. We are in agreement with this finding in relation to the proposed alteration to the

depth of the basement depths, but also note that the underground fuel tanks beneath the Interim Petrol Filling Station are due to be moved 11m to the NE (para 4.6). It is considered likely that this will not significantly change the findings of the assessment in relation to this element of the scheme but the applicant is asked to clarify effects of this relocation (refer to Amend 2 in Table 1).

- 2.25 The same specialists – Tavernor Consultancy – have undertaken a review of the proposed amendments in relation to built heritage. They decided that the amendments to the rear façade of Plot A2 – the change in material from timber to terracotta - required further assessment but that all other changes relate to improvements to the amenity and functionality of the buildings and are therefore not relevant to the TBHVIA (para. 9.3). We accept that the proposed 0.5m increase in the height of the structural columns of the Interim Petrol Filling Station is unlikely to make a material difference to the previous assessment of effects. However, the applicant is requested to provide further clarification in relation to the proposed increase in rooftop plant enclosure in Plot A2 and should state whether this is judged to change any of the assessed effects (Amend 3).
- 2.26 In relation to the material change of Plot A2 two views – View 27 Proposed Dock Office Walk; and View 28 Hothfield Place from Lower Road – have been updated (Appendix 2). Neither view appears to include any heritage assets (although this is not explicitly stated). The Statement of Conformity concludes that tonal difference is so minor as not to alter the previous TVBHA assessment findings. We accept this finding.
- 2.27 Pending a response to the request for further information, and the critique on the original ES notwithstanding, the built heritage assessment findings of the Statement of Conformity are considered to be acceptable.

Wind

- 2.28 The applicant has stated that Proposed Amendments to Plot A2 have the potential to alter the wind microclimate at the proposed development. There is a reduction in the proposed depth of planters on the fifth floor terrace, however, and accessible enclosed roof terrace will be created. Clarification is sought as to the design of the enclosed roof terrace, some initial drawings and/or direction of enclosure openings should be provided to ensure that a through draft will not occur, which would create an area of high wind speed on the terrace. Drawing CWM-AAM-A2-05-DR-A-07105 has now been provided, however it is still unclear as to which sections are part of the enclosure (Amend 4)
- 2.29 There is also a minor alteration to the leisure centre entrance canopy in Plot A2. As the canopy currently provides shelter from wind, clarification is sought as to the minor detail changes to the canopy as drawings showing the changes cannot be found in the online portal (Amend 5).
- 2.30 The applicant states that the wind conditions on the fifth floor terrace of the A2 plot are likely to be impacted by the proposed amendments. However, with the inclusion of suitable mitigation, the applicant states that the wind microclimate is expected to not change. Clarification is sought in the form of an engineering drawing of the new layout of the proposed fifth floor terrace and enclosure as well as location of proposed mitigation. A drawing was provided, however there is no indication as to where the proposed mitigation will be located. (Amend 6)
- 2.31 The applicant concludes that the wind microclimate will not likely change from previous assessments with the Proposed Amendments provided that adequate mitigation is installed. Before this statement can be considered acceptable, drawings of the Proposed Amendments at plot A2 are required and have been outlined as clarifications at the end of this document.

Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare

- 2.32 The reviewer (Delva Patman Redler) concurs with the February 2019 Statement of Conformity that the Proposed Amendments described therein do not materially alter the Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare assessments reported in the May 2018 ES and

October 2018 ES Addendum or the conclusions drawn therefrom. The reviewer's comments in the Final Review Reports dated November 2018 and March 2019 remain valid.

Cumulative Effects

- 2.33 The Statement of Conformity states that no new schemes have been brought forward since the submission of the October 2018 ES Addendum and that the Proposed Amendments would not alter the conclusions of the cumulative effects assessment within the May 2018 ES and October 2018 ES. This is acceptable.

Townscape, Built Heritage and Visual Impact Assessment

- 2.34 The February 2019 ES Statement of Conformity includes a section relevant to Townscape, Built Heritage and Visual Impact Assessment (TBHVIA) (Page 13). This considers the design amendments to the Outline and Detailed Proposals and the potential to alter the effects assessed as part of the May 2018 ES and October 2018 ES Addendum. It also references updated visualisations included at Appendix 2 of the ES Statement of Conformity.
- 2.35 The ES Statement of Conformity acknowledges at Paragraph 3.3 that during the four months that have lapsed since the submission of the October 2018 ES Addendum there have been no changes in policy and guidance or assessment methodology. Paragraph 3.4 states that no new cumulative schemes have come forward since the October 2018 ES Addendum was submitted.
- 2.36 The full description of proposed design amendments is clearly stated at Section 4 of the ES Statement of Conformity. Table 1 in Section 5 summarises the results of the review of individual disciplines including Townscape, Built Heritage and Visual Impacts. This gives an indication of the specific design changes that are likely to require further assessment with further reference to the respective section.
- 2.37 Section 9 of the Statement of Conformity sets out the review of the amendments with regard to the Townscape, Built Heritage and Visual effects. Paragraph 9.3 recognises that the minor amendments mostly relate to improvements to the amenity and functionality of the buildings and are therefore not relevant to the TBHVIA, with the exception of the change in façade materiality of the rear wing of Plot A2 from timber to terracotta which was considered to require further assessment. The effects are described in context of View 27 and View 28 and are supported by updated visualisations. This approach seems appropriate based on the limited visibility of Plot A2 from the other viewpoints.
- 2.38 Having reviewed the updated visualisations and descriptive text, the judgement that the proposed design revisions would alter the appearance of the proposed development but not to the extent that this would alter the level of effect assessed previously at Views 27 and 28 is appropriate.

Non-Technical Summary

- 2.39 The Statement of Conformity confirms that there are no changes required to the Non-Technical Summary (NTS) from the 2018 ES Addendum. This is considered acceptable but should be kept under review in case any responses or actions required to meet comments made in this review necessitate a change to the NTS.

Summary of Review Comments

Table 2.1 Summary of clarifications and further commentary responding to Waterman responses

Code	Summary of Clarifications Required from Applicant	Further Commentary in response to Waterman response (dated 1 st May 2019)
Amend 1	<p>Air Quality</p> <p>Consideration should be given to the risk of exceedance at the work space on plot A2’s roof terrace</p>	<p>Acceptable</p> <p>The Applicant has demonstrated that the existing energy centre dispersion modelling poses no risk to breaches of air quality standards.</p>
Amend 2	<p>Archaeology</p> <p>Clarify the potential effects of relocating the Interim Petrol Filling Station’s underground fuel tanks by 11m.</p>	<p>Acceptable</p> <p>The applicant has clarified that the fuel tanks would be located in Development Zone C, an area previously assessed in relation to proposals for a basement that would remove all potential archaeological remains. The fuel tanks would result in no worse effects than those previously reported.</p> <p>This information establishes the potential effects of the fuel tanks relocation and no further information is required.</p>
Amend 3	<p>Built Heritage</p> <p>The applicant is requested to provide further clarification in relation to the proposed increase in rooftop plant enclosure in Plot A2 and should state whether this is judged to change any of the assessed effects.</p>	<p>Acceptable</p> <p>The applicant has clarified that change to the rooftop plant enclosure on Plot A2 does not relate to its height but its length. They refer to planning application drawing elevations: Elevation 1: General Arrangement Ref CWM-AAM-A2-XX-DR-A-07200 and CWM-AAM-A2-XX-DR-A-07201 in the February 2019 Architectural Drawings and Area Schedule Plot A21. The applicant has further stated that the change in length is small and that the roof top plant enclosure is not visible. As such, we agree that the amendment results in no material change to the previous assessments. No further information is required.</p>

¹ The applicant has confirmed that Figures CWA20- AAM-ZZZ-XX-DR-AR-006200 P3; and Elevation 2: General Arrangement Ref CWA20-AAM-ZZZ-XXDR-AR-006201 P3 were incorrectly referenced in their response.

Code	Summary of Clarifications Required from Applicant	Further Commentary in response to Waterman response (dated 1st May 2019)
Amend 4	<p>Wind</p> <p>Clarification is sought as to the design of the enclosed fifth floor roof terrace, the drawings provided are not detailed enough. The type of enclosure and where it is located on the roof terrace are not clear.</p>	<p>Acceptable</p> <p>This is a satisfactory response; the detail is well described, and no further clarification is required</p>
Amend 5	<p>Wind</p> <p>Clarification is sought as to the minor detail changes to the leisure centre entrance canopy, as drawings showing the changes cannot be found in the online portal.</p>	<p>Acceptable</p> <p>This is a satisfactory response; the detail is well described, and no further clarification is required</p>
Amend 6	<p>Wind</p> <p>Clarification is sought in the form of an engineering drawing as to where the location of proposed mitigation is on the fifth floor terrace.</p>	<p>Acceptable</p> <p>This is a satisfactory response; the detail is well described, and no further clarification is required</p>
	<p>Summary of Potential Regulation 22 Information Requests to be made to Applicant</p>	
	None	N/A