Proposed Redevelopment of Bookers Group and Former BMW Garage Site

Nos 41-49 and 49-59 Battersea Park Road, Nine Elms London SW8

EIA Screening Report

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1. Introduction

1.1 Watkin Jones Group are bringing forward a planning application for the redevelopment of land currently occupied by a Bookers Group warehouse and a vacant BMW garage on Battersea Park Road, Nine Elms, London SW8. The proposed development would be mixed-use, including accommodation for up to 750 students and 80 residential units.

1.2 The proposal qualifies as "urban development" under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017, for which the "applicable thresholds and criteria" are as follows:

(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or

(ii) the development includes more than 150 dwellings; or

(iii) the overall area of the development exceeds 5 hectares.

1.3 Since the residential element of the scheme exceeds the 150-dwelling threshold by a substantial margin, it is assumed to qualify as "Schedule 2 development" and to require screening by the LPA to confirm whether EIA is required.

1.4 This report supports a request for a Screening Opinion, in accordance with Regulation 6, and provides the information required under Regulation 6(2). The remainder of this report is organised as follows:

- Section 2 describes the site location and characteristics of the area;
- Section 3 describes the proposed development;
- Section 4 sets out our approach to screening;
- Section 5 identifies the likely significant effects; and
- Section 6 sets out our view on the need for EIA.

1.5 A series of appendices relating to the screening of specific topics are attached.

2. Application Site and Local Context

2.1 The site is 0.8 hectares in area and is shown on **Figure 1**. It is defined to the north-west by its frontage to Battersea Park Road, to the north-east by the access road to New Covent Garden Market, to the south-east by the embankment of the mainline railway serving London Waterloo Station, and to the south-west partly by Sleaford Street (a local access road) and partly by the former Dairy Crest site, which is undergoing redevelopment.

2.2 The western part of the site is occupied by a two-storey warehouse operated by Booker Group. The eastern part is occupied by BMW Nine Elms Lane, comprising a workshop building and service yard. Both parts of the site are accessed from the New Covent Garden Market access road. Six mature deciduous trees within the site are the subject of Tree Preservation Orders.

2.3 The surrounding area was formerly predominantly in commercial use, although this has to a substantial degree been displaced by regeneration, typically of medium- to high-rise residential blocks. Battersea Power Station, which has long been the centrepiece of this process, lies to the north and is becoming largely surrounded by residential blocks, which form the frontage to Battersea Park Road and extend eastwards beyond Kirtling Street.

2.4 New Covent Garden Flower Market lies to the north-east of the market access road, although this site has planning permission for mixed-use development up to 18 storeys. New Covent Garden Market itself is located to the east of the railway and is accessed via an underbridge.

2.5 Sleaford Street is adjoined to the south-west by the 4-9 storey Viridian apartment complex and a few remaining single-storey commercial units, beyond which lie Thessaly Road and the residential Savona Estate.

Figure 1: Application Site

3. Proposed Development

3.1 The scheme comprises student accommodation of 750 beds (sui generis), 80 residential (Class C3) units, 550sqm of commercial floorspace (Class E) and associated internal amenity/cultural space, service areas, car and cycle parking, together with external landscaping and public realm. The proposed site layout and ground-floor uses are shown in **Figure 2**.

3.2 The accommodation would be provided in six buildings (A-F). Building A would occupy the north-western corner of the site, with frontages to Battersea Park Road and Sleaford Street. Buildings B-F would be aligned along the north-eastern boundary, with B/C and D/E/F forming conjoined blocks. The massing of the buildings would be as follows (number of storeys and approximate maximum height in metres AOD):

- A: Ground + 14 storeys (53m);
- B: Ground + 16 storeys (57m AOD);
- C +E: Ground + 6 storeys (28m AOD);
- D: Ground + 18 storeys (65m AOD); and
- F: Ground + 21 storeys (71 m AOD).

3.3 The external spaces/public realm will provide amenity and greening, and will be integrated into the surrounding public realm. Whilst five of the protected trees would be removed, the proposed landscaping would aim to include the planting 11 semi-mature trees and complementary planting.

3.4 Vehicular access would be provided along Sleaford Street and a proposed through route to the New Covent Garden market access road. On-site parking would comprise 11 Blue Badge spaces, and cycle parking would be provided in accordance with the London Plan. The main pedestrian access would be from Battersea Park Road, with secondary access points from Sleaford Street and the north-eastern boundary.

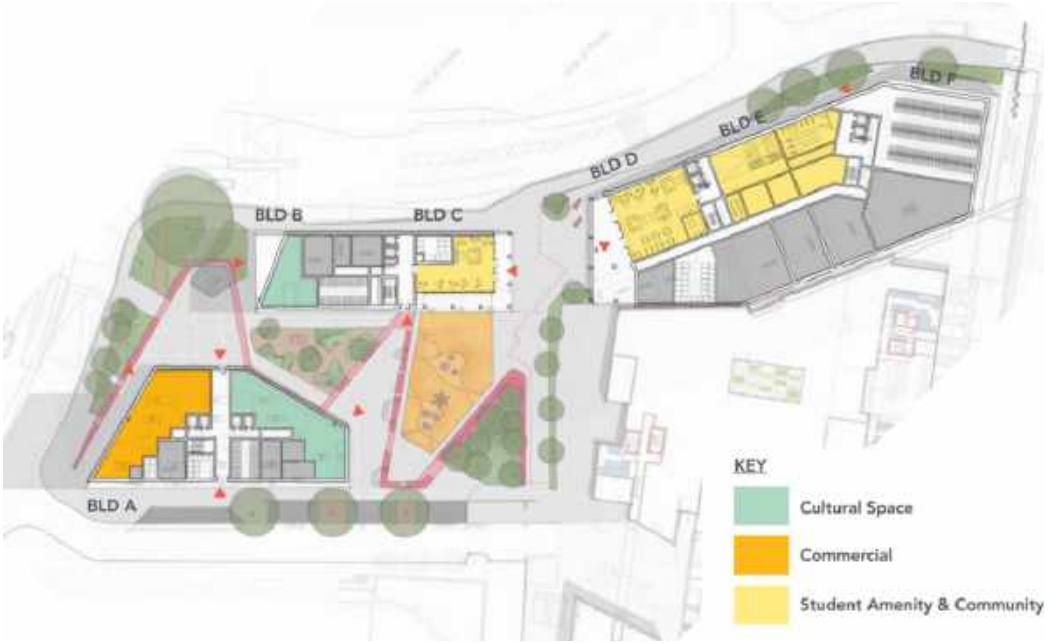

Figure 2: Proposed Site Layout and Ground-Floor Uses

3.5 The energy strategy is evolving; however, space heating and domestic hot water are likely to be sources either from a connection to the Vauxhall Nine Elms district heating network or from on-site heat pumps. The development will also include energy efficient measures such as 100% LED lighting and MVHR-based ventilation.

4. Approach to Screening

Requirements for the Technical Content of an ES

4.1 Regulation 4(2) identifies the following factors (and the interactions between them) that should be addressed in an EIA:

(a) Population and human health;

(b) Biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(a) and Directive 2009/147/EC(b);

(c) Land, soil, water, air and climate; and

(d) Material assets, cultural heritage and the landscape.

4.2 Further requirements are identified in Schedule 4: Information for Inclusion in Environmental Impact Assessment Reports. Paragraph 5 sets out the sources of likely significant effects that should be considered, which include the following (only the sub-paras that refer to specific topics are quoted):

(b) the use of natural resources, in particular land, soil, water and biodiversity…;

(c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;

(d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters); [and]

(f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change.

Guidance

4.3 Paragraph 018 of the Planning Practice Guidance (PPG) states:

Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment. While it is not possible to formulate criteria or thresholds which will provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment. It is also possible to provide an indication of the sort of development for which an assessment is unlikely to be necessary. To aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced. See the indicative thresholds and criteria. The table also gives an indication of the types of impact that are most likely to be significant for particular types of development.

However, it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits.

Identifying the Likely Significant Effects

4.4 The primary purpose of EIA is to identify the "likely significant effects" of a development. Effects that are unlikely to occur or which, if they do, would be insignificant, do not trigger a need for EIA or for inclusion within the scope of an EIA. Likelihood and significance are derived from interaction between the characteristics of the development and the receiving environment, as described in Sections 3 and 4 of this report. Whether the resulting effects are both likely and significant will depend, amongst other things, on:

- their magnitude and predictability;
- the sensitivity of the resources/receptors that would be affected;
- the importance of the effects in the decision-making process; and
- the extent to which adverse effects may be avoided or reduced through mitigation.

4.5 Significance can be a problematic concept. Its definition varies between topics; in some cases, it can be related to numerical criteria (e.g. for air quality, noise or traffic), whilst in others it is more a matter of judgement (e.g. for townscape and cultural heritage). Significance can also reflect the policy and regulatory context (e.g. in terms of whether policy requirements would be met).

4.6 The role of mitigation is critical, since the overwhelming majority of adverse effects can normally be avoided, reduced or offset by a range of measures. These can include design features incorporated into a development (e.g. sustainable drainage or sound insulation), management measures (e.g. travel plans), pre-emptive measures (e.g. archaeological or ground investigations), compensatory measures (e.g. habitat creation) or financial contributions (e.g. via the CIL).

4.7 Such measures are well understood, of proven efficacy and can be implemented through the planning and regulatory process (e.g. via conditions or obligations). Where a potential for significant effects has been identified, it is therefore legitimate to consider the likelihood that they could be avoided through mitigation. This approach is endorsed in the PPG, which states (in para 018):

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.

5. Likelihood of Significant Effects

Sifting of Topics

5.1 The likelihood of significant effects arising from this development is set out in **Table 1** below in relation to a checklist of topics that reflects the regulatory requirements, the characteristics of the development proposed in this case, and the sensitivity of the receiving environment. Account has been taken of the potential effectiveness of mitigation, where this can reasonably be assumed to be adopted as a policy requirement or a matter of best practice, in assessing whether the residual effects (i.e. those following mitigation) are likely to be significant. Explanatory notes or report extracts relating to specific topics are attached as **Appendices** and are referenced in the table.

5.2 The likelihood of effects has been defined as follows:

- Likely: Significant effects are definitely or highly likely to occur;
- Unlikely: Significant effects are definitely or highly unlikely to occur; or
- Cannot be ruled out: An effect that may or may not occur, or which may or may not be significant.

Table 1: Likelihood of Significant Effects

Topic	Significant Effects?	Explanation
Accidents and Disasters	Unlikely	• No abnormal sources of risk have been identified.
Aircraft Safeguarding	Unlikely	• Developments are not permitted to give rise to risks that could compromise safe operations. • Consultation with NATS, London Heliport etc will take place if necessary.
Air Quality **Appendix 1**	Unlikely with mitigation	• The site is located within an AQMA adjoining a major road. • However, preliminary work indicates that concentrations of key pollutants are unlikely to exceed the relevant AQ Objectives. • The energy strategy would not involve combustion-based technology (e.g. CHP). • If required, an appropriate ventilation solution would ensure that residents are not exposed to poor air quality. • Dust control measures during demolition/construction would minimise the effects of nuisance and any risk to health.
Archaeology **Appendix 2**	Unlikely with mitigation	• The site appears to be located wholly within the Tier 3 Battersea Channel Archaeological Priority Area (APA).

		• Archaeological survival is likely to have been affected by previous construction/development of the site. • An archaeological desk-based assessment (DBA) was submitted in 2015. • The LPA previously accepted that archaeology could be addressed by condition through archaeological work in accordance with a written scheme of investigation (WSI). • The previous DBA is being updated to reflect current archaeological information and a search of the GLHER. • It is anticipated that significant effects can be avoided, as before, through a programme of works in accordance with a WSI.
Built Heritage **Appendix 10**	Unlikely	• The nearest listed buildings are the Grade II* Battersea Power Station and Grade II Battersea Dogs and Cats Home; the site is not located within a Conservation Area. • The proposals would be seen in the context of recent/ongoing redevelopment in the local area, which has already affected the setting of relevant assets, such that the incremental impacts of the proposal are unlikely to be significant. • This would be confirmed through a Heritage, Townscape and Visual Impact Assessment (HTVIA).
Climate Change **Appendix 3**	Unlikely	• The proposed development would meet the 35% reduction in GHG emissions over Building Regs required under London Plan Policy S12. • Residual carbon emissions would be offset by payments to the LBW carbon fund. • The design will target compliance with a BREEAM "Outstanding" rating, which represents a significant improvement in performance over that of the existing buildings on the site. • Embodied carbon emissions would be minimised through a lifecycle analysis, in accordance with London Plan and BREEAM criteria. • Operational carbon emissions will be minimised through a fabric-first approach and use of high-efficiency heating, ventilation and lighting. • The energy strategy would be based on low- and zero-carbon technologies, including an all-electric heating solution probably using air-source heat pumps.

Daylight and Sunlight **Appendix 4**	Unlikely to be significant in EIA terms	• Much of the immediate context of the site is unusually open (for an inner-urban location), but will change as taller buildings are introduced within the Opportunity Area. • Lighting levels received at the most sensitive nearby receptor (Viridian Apartments) are affected by the detailed design of that building (e.g. balconies), and are arguably atypical within a changing townscape context. • Whilst parts of the proposed development will be taller than the consented scheme (e.g. Block A), other parts will be lower (e.g. Block B). • Compliance with the BRE guidance is unlikely to be achievable in some cases; however, a pragmatic approach needs to be taken in such situations, particularly in terms of how this relates to EIA significance. • The overall level of compliance is anticipated to remain largely comparable with the consented scheme, which did not require EIA.
Ecology **Appendix 5**	Unlikely with mitigation	• The site does not adjoin, and is not located close to, any designated sites or notable habitats; the nearest such designation is the Battersea Park Local Nature Reserve, 0.6km to the west. • Any such designations are sufficiently distant from, or lack connectivity with, the site, as to be highly unlikely to experience any impact. • The site is generally of low ecological value, with limited potential to support protected or notable species. • The existing buildings and trees provide negligible roosting potential for bats. • The trees, together with off-site scrub, provide some nesting potential for birds. • Whilst the trees would be removed during construction, this would take place outside the nesting season, or following inspection by an ecologist, so as to avoid any significant effects. • Replacement habitat, including bat and bird boxes, would be provided by the proposed landscaping scheme. • An Ecological Impact Assessment will be submitted in support of the application, the Executive Summary from which is presented in the Appendix.

Flood Risk + Drainage **Appendix 6**	Unlikely with mitigation	• The site is located within Flood Zone 3 (functional floodplain), which denotes a "high probability" of flooding. • The primary source of flood risk is the tidal Thames, but the site is located within an area that benefits from the associated flood defences. • In the absence of mitigation, potential effects relate to water quality during construction and flood risk on completion, and are predicted to be no greater than moderate adverse. • The site is already developed, so there would not be a significant increase in runoff. • Construction effects would be minimized through adherence to a Construction Environmental Management Plan (CEMP). • Operational effects would be minimized through detailed design to ensure, for example, that vulnerable uses are not at risk and that refuge areas/safe egress routes are available; and through the provision of a sustainable drainage strategy. • As a result, the residual effects are not anticipated to be significant. An FRA and Drainage Strategy are being prepared, in accordance with the NPPF, and will be submitted in support of the application.
Ground Conditions + Contamination **Appendix 7**	Unlikely with mitigation	• The bedrock (London Clay) is designated as an Unproductive Aquifer, and the superficial deposits as a Secondary A and Secondary Undifferentiated Aquifer. • The site is located within an Environment Agency Inner Catchment Source Protection Zone (SPZ) 1. • Ground investigation has confirmed elevated concentrations of heavy metals, asbestos and polycyclic aromatic hydrocarbons in parts of the made ground, which is typical of such brownfield sites. • The site is considered to have a medium risk of unexploded ordnance (UXO). • Further site investigation (SI), gas monitoring and conceptual risk assessment will be carried out, on the basis of which a remediation strategy will be agreed. • Environmental and heath precautions in accordance with best practice will be implemented during construction (e.g. to minimise risks to site workers and groundwater). • With remediation of any contamination encountered, and an appropriate construction response (e.g. importation of clean fill), the site can be made fit for purpose, such that any residual effects are unlikely to be significant.

Human Health **Appendix 9**	Unlikely	• This would normally be addressed as necessary under other topics (e.g. air quality, socio-economics), but a separate health impact assessment (HIA) would be prepared if requested by the LPA. • Any adverse effects on healthcare capacity would if necessary be mitigated through financial contributions.
Material Assets	• Addressed under other topics	
Noise and Vibration **Appendix 8**	Unlikely with mitigation	• Road and rail traffic are the principal existing sources of noise. • Vibration from the railway is unlikely to be sufficiently perceptible to give rise to significant effects. • Construction impacts on receptors such as occupants of nearby residential properties would be mitigated through the application of best practicable means as part of a Construction Environmental Management Plan. • Noise levels from building services plant would be controlled by condition so as to avoid significant effects. • Background noise impacts on new residents would be minimised through the adoption of appropriate mitigation embedded into the design of the building fabric, glazing and ventilation system. • An ambient noise survey will be undertaken and a noise impact report prepared in support of the application.
Socio-Economics **Appendix 9**	Unlikely	• The only potentially adverse effects relate to the loss of employment from the existing Booker warehouse, the loss of rateable income to the LPA and the additional demand placed on heathcare, education and open space by the incoming students and residents. • The employment loss is likely to be offset by the employment provided by the commercial floorspace, such that the residual effect would be neutral or beneficial. • The loss of rateable income is likely to be partially offset by an increase in council tax revenue and other fiscal beneficial, such that the effect would be no greater than minor adverse. • The effects on school capacity, GP surgeries and access to open space are anticipated to be negligible, minor adverse and negligible respectively, and would not be significant. • The effects on local businesses and housing targets are predicted to be negligible beneficial and minor beneficial respectively, and would not be significant.

Townscape and Views **Appendix 10**	Unlikely	• The site is located within the Vauxhall Nine Elms Battersea Opportunity Area, where the townscape has in recent years undergone fundamental change, which is continuing. • The proposals, whilst slightly taller than the extant consent, comply with the principles found to be acceptable at that time. • Preliminary assessment indicates that the development would have no impact on any strategic or designated views (i.e. those from the London View Management Framework and the Wandsworth Local Views SPD). • Because of the scale and density of surrounding development, impacts on townscape character and visual amenity are anticipated to be relatively localised, predominantly beneficial and unlikely to be significant in EIA terms. • The application will be supported by a standalone Heritage, Townscape and Visual Impact Assessment (HTVIA).
Transport **Appendix 11**	Unlikely	• With opening of the Northern Line Extension to Battersea Power Station, the site is highly accessible by public transport. • The car-free approach to be adopted would generate very low levels of traffic, which would be significantly less than that currently serving the site. • Although the level of pedestrian, cycle and public transport trips would increase, they would not be materially different to those predicted for the extant permission. • A Transport Assessment and Framework Travel Plan will be submitted with the application.
Utilities	Unlikely	• It may be assumed that statutory provisions ensure that any interruptions to supply would be minimal, and that any network reinforcement will take place as necessary.
Waste	Unlikely	• The main arising will be household waste, which would be managed in accordance with the LPA waste strategy; there would be a low risk of any hazardous waste arising. • It is assumed that waste management capacity within the borough would increase in line with consented developments, such that the residual effects are not predicted to be significant.
Wind Microclimate **Appendix 12**	Unlikely with mitigation	• Surrounding buildings provide a degree of shelter to the site, such that existing wind conditions are likely to be suitable for a mixture of sitting, standing and walking, as is typical for such locations. • The proposed massing could give rise to accelerated wind speeds around the northern end (Battersea Park Road frontage) of the site.

		• However, conditions are anticipated to remain suitable for the intended pedestrian activity, and to be capable of mitigation through landscape measures, such that appropriate levels of amenity and safety are achieved. • A full wind microclimate study, based on CFD testing, would be submitted with the application.

6. Need for EIA

Result of Sifting Exercise

6.1 The sifting exercise has indicated that the environmental effects of the development are unlikely to be significant in EIA terms, for one or more of the following reasons:

- Such effects would not be permitted in any event for reasons of regulatory compliance;
- Relevant resources and receptors are either absent or of low sensitivity;
- The character of the local area is already dominated by the redevelopment that has occurred in recent years, and which is continuing;
- The magnitude and/or spatial scope of effects would be insufficient to exceed accepted thresholds of significance; and/or
- Where a potential for significant effects may have been identified, these would be avoided through mitigation by design or management.

Role of Mitigation

6.2 As previously noted, screening should take account of the ability for mitigating measures to avoid significant adverse effects. Such measures are well understood, their effectiveness can be predicted, and they can generally be enforced through routine planning mechanisms. Where this can be anticipated to a reasonable degree of certainty, there should be no need for a topic to provide a trigger for EIA. This applies in particular to the potential effects relating to the following:

- Air Quality;
- Archaeology;
- Ecology;
- Flood Risk and Drainage;
- Ground Conditions and Contamination; and
- Noise and Vibration.

Defining Significance for EIA Purposes

6.3 Effects can be either beneficial or adverse. The focus of EIA is on adverse effects and how these can be mitigated. It follows, therefore, that beneficial effects – such as those anticipated in relation to socio-economics and townscape/views - should not be regarded as a trigger for EIA.

6.4 Some topics may give rise to effects that are both beneficial and adverse, creating the potential for the former to mitigate or compensate for the latter. This is notably the case in relation to townscape and views, whereby a development may be prominent, but may also be of demonstrable architectural quality.

6.5 The significance of effects in EIA terms is not always directly related to the technical approach adopted for some topics. This is of particular relevance to the assessment of daylight and sunlight, which would be carried out in accordance with the BRE guidance. Whilst these standards represent the industry benchmark, they can rarely be fully met in high-density built-up areas, where a degree of tolerance is required. As a result, non-compliance with the guidance, particularly for a relatively small number of properties, does not necessarily amount to an effect that is significant in EIA terms.

Consented Baseline

6.6 The site is subject to an extant consent for redevelopment (ref: 2015/6813), comprising: *Demolition of all existing buildings and construction of new buildings of between 5 storeys and 18 storeys, containing 307 residential units, business (Class B1) floorspace and flexible retail/restaurant and cafe/business floorspace (Class A1-A5 and B1), CHP basement, vehicle and cycle parking, plant and associated works, landscaping and a new access onto Sleaford Street.*

6.7 An EIA Screening Opinion (2015/5273) was submitted in September 2015 for the extant consent, which was not considered to require EIA.

6.8 The current proposal is acknowledged to be of slightly greater height than the extant consent. These differences, however, are not considered to be fundamental, such that the incremental impacts of the current proposal are unlikely to give rise to effects that are of such significance as to trigger a need for EIA.

Supporting Information

6.9 The application will be supported by assessments of all relevant topics to the appropriate industry-wide and policy-compliant standards, as set out in the **Appendices**. Whilst these assessments will not, in the absence of EIA, adopt the usual significance terminology, they will otherwise be very similar in approach and presentation to those normally expected of an ES. They will therefore provide sufficient environmental information to form a robust basis for determination.

Conclusion

6.10 Taking account of the above, the effects of this proposal are considered unlikely to be significant in EIA terms. Potentially adverse effects would be capable of mitigation through a range of measures of proven effectiveness, the adoption of which can be enforced by the LPA in the usual way. It is therefore considered unnecessary to bring this proposal within the scope of the EIA Regulations, and that its environmental effects can be adequately identified, and appropriate mitigation agreed, on the basis of a series of technical assessments forming part of the planning deliverables.

Appendices

The following appendices assess the likelihood of significant effects arising in relation to each topic, identify the mitigation that would be adopted where necessary and set out the scope of work that is proposed.

APPENDIX 1
Air Quality

AIR QUALITY SCREENING REPORT - BATTERSEA PARK ROAD, LONDON

Introduction

An Air Quality Screening Report has been prepared in order to outline baseline conditions, provide consideration to potential air quality impacts as a result of the proposed development and determine whether an Environmental Impact Assessment (EIA) is required in respect to Air Quality. This is discussed within the following Sections.

Baseline Conditions

Local Air Quality Management

As required by the Environment Act (1995), London Borough of Wandsworth (LBoW) has undertaken Review and Assessment of air quality within their area of jurisdiction. This process has indicated that annual mean concentrations of nitrogen dioxide (NO_2) and 24-hour mean concentrations of particulate matter with an aerodynamic diameter of less than 10µm (PM_{10}) are above the Air Quality Objectives (AQOs) within the borough. As such, one Air Quality Management Area (AQMA) has been declared. This is described as follows:

"The whole borough."

The development is located within the AQMA. As such, there is the potential for exposure of future occupants to poor air quality and vehicles travelling to and from the site to increase pollution levels in this sensitive area.

Air Quality Monitoring

Monitoring of pollutant concentrations is undertaken by LBoW throughout their area of jurisdiction. Recent NO_2 results recorded in the vicinity of the development are shown in Table 1. Exceedences of the relevant AQO are shown in **bold**.

Table 1 Monitoring Results

Monitoring Site		Monitored NO_2 Concentration (µg/m^3)		
		2017	2018	2019
NE5	Kirtling Street	-[a]	**46**	39

Monitoring Site		Monitored NO_2 Concentration (µg/m³)		
		2017	2018	2019
WAA	Thessaly Road, Battersea	33	33	32

Note: (a) Site commissioned in 2018.

As shown in Table 1, annual mean NO_2 concentrations were above the AQO of 40µg/m³ at the NE - Kirtling Street monitor in 2018. Levels have since reduced to below the AQO. Annual mean NO_2 concentrations were below the relevant AQO at WAA - Thessaly Road in recent years.

Background Pollutant Concentration Predictions

Predictions of NO_2, PM_{10} and particulate matter with an aerodynamic diameter of less than 2.5µm ($PM_{2.5}$) concentrations on a 1km by 1km grid basis have been produced by Department for Environment, Food and Rural Affairs (DEFRA). These maps cover the entire of the UK to assist Local Authorities (LAs) in their Review and Assessment of air quality. The proposed development is located in grid square NGR: 529500, 177500. Data for this location was downloaded from the DEFRA website[1] and is summarised in Table 2.

Table 2 Background Pollutant Concentration Predictions

Pollutant	Predicted Background 2022 Concentration (µg/m³)
NO_2	25.28
PM_{10}	18.03
$PM_{2.5}$	11.60

As shown in Table 2, background pollutant concentrations are below the AQOs for NO_2 and PM_{10} of 40µg/m³ and below the Air Quality Limit Value (AQLV) for $PM_{2.5}$ of 20µg/m³ at the proposed development site.

[1] https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018.

Sensitive Receptor Locations

The site is in an urban setting and bound to the east by the New Covent Garden Market Access Road, to the north by Battersea Park Road, to the west by Sleaford Street and to the south by the London Waterloo to Weybridge railway line. Residential properties are situated along Sleaford Street, opposite to the western boundary of the development. These may be affected by any atmospheric emissions associated with the construction and operational phases of the proposals.

Potential Air Quality Impacts and Requirement for an Air Quality EIA

The proposals have the potential to cause air quality impacts during construction and operation, as well as expose future occupants to elevated pollution levels. However, associated effects are unlikely to be significant due to the following reasons:

- Potential air quality impacts as a result of the construction phase of the proposed development will be minimised by the implementation of appropriate mitigation measures identified in accordance with the Mayor of London's 'The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance'[2]. This is anticipated to control effects associated with fugitive dust emissions arising from demolition, earthworks, construction and trackout activities to an acceptable level;
- The development is 'car free' in accordance with the definition set out within The London Plan 2021[3]. As such, there are not anticipated to be any transport related emissions from the scheme. Operational phase road traffic exhaust impacts are therefore not considered to be significant;
- The energy strategy for the development will comprise either Air Source Heat Pumps or District Heating. These do not generate any emissions on-site. However, connection to the District Heating network may require the use of a combustion plant for a period of 1-year. This would be designed to comply with The Sustainable Design and Construction Supplementary Planning Guidance SPG[4] and utilised temporarily. Impacts are therefore not anticipated to be significant; and,
- Exposure of future occupants to exceedences of the relevant AQOs and AQLV will prevented through the implementation of mechanical ventilation, if necessary. This requirement can be determined through dispersion modelling to ensure impacts are not significant.

2 The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance, The Mayor of London, 2014.

3 The London Plan, Greater London Authority (GLA), 2021.

4 Sustainable Design and Construction SPG, GLA, 2014.

Based on the above factors, potential air quality impacts can be minimised though the implementation of appropriate mitigation measures. Effects are therefore unlikely to be significant and an Air Quality EIA is not considered to be required. However, a standalone Air Quality Assessment will be provided as outlined below.

Air Quality Assessment Methodology

An Air Quality Assessment will accompany the planning application for the development. This will be prepared in accordance with the following assessment methodology.

Baseline

Baseline air quality conditions in the vicinity of the site will be defined based on recent monitoring results and information from the DEFRA Air Quality Resource. Sensitive locations that could be affected by the proposals will also be identified, as well as any relevant planning policies or guidance.

Construction Phase Assessment

During the construction of the proposed development there is the potential for air quality impacts as a result of fugitive dust emissions from demolition, earthworks, construction and trackout activities. It is proposed to assess these in accordance with the Mayor of London's 'The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance'[5].

Operational Phase Assessment

It is proposed to undertake detailed dispersion modelling using ADMS-Roads in order to fully quantify NO_2, PM_{10} and $PM_{2.5}$ levels at the site and identify any potential exposure of future occupants to unacceptable concentrations. ADMS-Roads is a commonly used software package for the prediction of pollution dispersion and the results are accepted by Local Authorities throughout the UK.

The assessment will be undertaken using relevant traffic data, local land use characteristics and 1-year of hourly meteorological records taken from London City Airport observation station. The

[5] The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance, The Mayor of London, 2014.

modelling outputs will be verified against local monitoring data in accordance with the DEFRA methodology. Impacts will be predicted at sensitive receptor locations and also displayed graphically throughout the assessment extents using contour plots.

Predicted pollutant concentrations will be compared against the AQOs, as defined in the UK Air Quality Strategy and associated regulations, and the Air Pollution Exposure Criteria (APEC) provided within the London Council's Air Quality and Planning Guidance[6]. This will determine the potential for exposure of future occupants to elevated pollutant levels and inform any necessary mitigation strategy.

During the operational phase of the development there is the potential for air quality impacts as a result of traffic exhaust emissions associated with vehicles travelling to and from the site. Given the proposals are 'car free', a screening assessment will be undertaken in accordance with the criteria contained within the IAQM 'Land-Use Planning & Development Control: Planning for Air Quality'[7] guidance document to assess potential impacts from development traffic.

Mitigation

If required following assessment of potential impacts, suitable mitigation measures will be identified in order to reduce air quality effects to an acceptable level.

Air Quality Screening Report produced by Anna Totterdill, Air Quality Consultant, Redmore Environmental, on 1st February 2022.

6 London Councils Air Quality and Planning Guidance, London Councils, 2007.
7 Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

APPENDIX 2
Archaeology

41-59 Battersea Park Road – Archaeology

1. An archaeological desk-based assessment was produced in 2015 (CgMs, 2015) and concluded that As remains of national importance are not anticipated it is recommended that archaeological work could be secured by way of a standard archaeological condition.
2. The GLHER data presented in CgMs (2015) indicated that the site partially lay in the Wandsworth Archaeological Priority Area (APA).
3. The L B of Wandsworth granted consent for redevelopment (28.3.19. Planning case: 2015/6813) with a standard archaeological planning condition attached.

   Condition 27. No development other than the demolition to ground level of any existing buildings or structures on the site shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme for investigation which has been submitted by the applicant and approved by the Local Planning Authority. The development shall only take place in accordance with the detailed scheme pursuant to this condition. The archaeological works shall be carried out by a suitably qualified investigating body acceptable to the local planning authority. In order that the archaeological remains that may exist on the site can be investigated, in accordance with Council policies DMS2(d).

4. The Committee Report for this application included

   14.1 English Heritage have advised that they are content to recommend approval of the desk based assessments and do not consider that any fieldwork needs to be undertaken prior to granting of planning permission. The Council is satisfied that the potential archaeological significance of the site has been appropriately considered and that any effects can be mitigated. To ensure this a condition will be attached requiring the implementation of a programme of archaeological work in accordance with a written scheme for investigation.

5. Subsequent to the 2015 archaeological desk-based assessment, a large amount of archaeological work has taken place within the vicinity of the site. The L B of Wandsworth have extended their APA's so that the whole site now appears to lie with the Tier 3 Battersea Channel APA - https://historicengland.org.uk/content/docs/planning/apa-wandsworth/
6. Historic England (2016) describe a Tier 3 APA as;

   This is a landscape scale zone within which the GLHER holds evidence indicating the potential for heritage assets of archaeological interest. The definition of Tier 3 APAs involves using the GLHER to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future (NPPF 169). Tier 3 APAs will typically be defined by geological, topographical or land use considerations in relation to known patterns of heritage asset distribution.

7. A new archaeological desk-based assessment will be produced to support a new planning application for the site with current archaeological information and a new search of the GLHER included. This will include available information on the existing construction / development impacts that may have affected archaeological survival.
8. It is considered that this new technical assessment will be sufficient to support a new application and any archaeological requirements can be secured with archaeological planning condition(s) attached.

Simon Blatherwick
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RPS Consulting
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London, EC4A 4AB,
07966 125153 / blatherwicks@rpsgroup.com

Sources

CgMs, 2015, 41-59 Battersea Park Road, Nine Elms . Archaeological Desk Based Assessment

Historic England, 2016, Greater London Archaeological Priority Area Guidelines

APPENDIX 3
Climate Change

DESIGN NOTE 04

PROJECT	6892 - BATTERSEA PARK ROAD
TITLE	CLIMATE CHANGE SCOPING NOTE
REV	00

DN04

CREATED	BERNIE CARR	DATE	03/02/2022
CHECKED	JOSEPH LAZELL	DATE	03/02/2022
APPROVED	DAVID CAMERON	DATE	03/02/2022

1.0 INTRODUCTION

This Design Note has been prepared to provide a response to the Climate Change impact of the proposed Battersea Park Road development, as part of the Environmental Impact Assessment (EIA) scoping review.

The aim of Environmental Impact Assessment is to provide local planning authorities details of potential impacts that a proposed development could have on the local environment. The process for EIA is detailed within the Town and Country Planning Regulation (2017), which outlines the procedures to identify and scope potential environmental impacts and how these will be minimised/ mitigated resulting from the new development.

The first step of the EIA procedure is to undertake a scoping exercise to identify all potential environmental impacts. One such environmental topic considered as part of the scoping exercise is climate change impact which this design note addresses.

2.0 EIA CLIMATE CHANGE TOPIC SCREENING

PROPOSED SCHEME

The scheme comprises student accommodation of 750 beds (sui generis), 80 residential (Class C3) units, 550sqm of commercial floorspace (Class E) and associated internal amenity/cultural space, service areas, car and cycle parking, together with external landscaping and public realm.

The accommodation would be provided in six buildings (A-F). Building A would occupy the north-western corner of the site, with frontages to Battersea Park Road and Sleaford Street. Buildings B-F would be aligned along the north-eastern boundary, with B/C and D/E/F forming conjoined blocks. The massing of the buildings would be as follows (number of storeys and approximate maximum height in metres AOD):

- A: Ground + 14 storeys (53m);
- B: Ground + 16 storeys (57m AOD);
- C +E: Ground + 6 storeys (28m AOD);
- D: Ground + 18 storeys (65m AOD); and
- F: Ground + 21 storeys (71 m AOD).

The external spaces/public realm will provide amenity and greening, and will be integrated into the surrounding public realm. Whilst five of the protected trees on the site would be removed, the proposed landscaping would aim to include the planting 11 semi-mature trees and complementary planting.

The energy strategy is evolving; however it is likely the heating source for the development will be either a connection to the nearby Vauxhall Nine Elms district heating network or from on-site heat pumps. Either option will deliver space heating and domestic hot water. The development will also include energy efficient measures such as 100% LED lighting and MVHR-based ventilation.

Vehicular access would be provided along Sleaford Street and a proposed through route to the New Covent Garden market access road. On-site parking would comprise 11 Blue Badge spaces, and cycle parking would be provided in accordance with the London Plan. The main pedestrian access would be from Battersea Park Road, with secondary access points from Sleaford Street and the north-eastern boundary.

EIA CLIMATE CHANGE SCOPING RESPONSE

As part of the scoping/ screening, relevant consultants/ specialists are asked to respond to the following question:

In the absence of mitigation, how likely is the development to give rise to significant effects relating to your topic?

(a) Likely
(b) Unlikely
(c) Not currently known

In terms of the climate change impact, the response for the Battersea Park Road development is (b) Unlikely. The reason for this selection is provided below:

Although the Battersea Park Road development will contribute to global climate change, it will not have a direct impact on the local environment and its climate that other topics such as ecology, air quality and transport may have. As such option (b) has been selected.

Although the development will have no direct local environmental impact, measures to minimise its carbon footprint will be implemented through the planning framework, in particular the London Plan (2017) Planning Policies. This includes minimising the buildings embodied carbon by selecting construction materials that have a low inherent carbon content over its entire life cycle (i.e. in the extraction, manufacture, construction, operation, and disposal). By completing an embodied carbon life cycle analysis, the carbon emissions associated with the materials used to construct the building will be quantified, measured, and reduced in accordance with London Plan and BREEAM criteria. Furthermore a pre-demolition audit of the current building that occupies the site will be undertaken to identify opportunities for direct recycling of waste on-site as well as off-site recycling solutions.

The buildings operational carbon emissions (i.e. emissions associated with the building in use for heating, lighting etc.) will be minimised through enhancements to the building's energy performance. This will be delivered through a fabric first approach which involves increased levels in insulation and air tightness and the installation of highly efficient heating, ventilation and lighting plant and equipment. Furthermore Low and Zero Carbon technologies will be installed to generate low carbon end renewable energy for the building. Current proposals are to apply an all-electric heating solution for the building which will likely include air source heat pump technology to generate low carbon heat. By adopting an all-electric heating strategy, the buildings carbon emissions will continually reduce overtime as the national grid becomes de-carbonised. This aligns with the Climate Change Committee guidance and London Energy Transformation Committee (LETI) for achieving net zero carbon buildings.

In accordance with Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan, the development will achieve a 35% improvement on current building regulation carbon emissions standards. The remaining residual carbon emissions will be off-set through payment to the local borough carbon fund, which is used to finance carbon saving initiatives and projects within the Wandsworth borough.

It can therefore be demonstrated that although the Battersea Park Road development will not have a direct climate change impact on the local environment, it is addressing the wider global climate change emergency, through compliance with the planning policy criteria, while also targeting a BREEAM Outstanding rating.

APPENDIX 4
Daylight and Sunlight

Peter Radmall
Peter Radmall Associates
Firbank
Ashdown Road
Forest Row
East Sussex RH18 5BW

17 SLINGSBY PLACE
LONDON | WC2E 9AB

7th February 2022

Dear Peter,

RE: BOOKERS, VAUXHALL – DAYLIGHT, SUNLIGHT & OVERSHADOWING

I write in connection with the proposed redevelopment of 41- 49 and 49 -59 Battersea Park Road, Vauxhall in the London Borough of Wandsworth ('LBW'), specifically in so far as any daylight, sunlight and overshadowing considerations are concerned.

Point 2 provided detailed daylight, sunlight and overshadowing advice in respect of the extant planning permission for the site (Wandsworth Planning Application ref: 2015/6813) in the form of specialist technical assessments and the production of a formal Daylight, Sunlight and Overshadowing Report to support the planning application.

The detailed technical assessments were based upon the advice and recommendations set out in the BRE document 'Site Layout Planning for Daylight & Sunlight: A Guide to Good Practice (2011)'

The 2011 BRE guidance provides advice on site layout planning to achieve good sunlight and daylight within buildings, and in the open spaces between them. The advice it gives is not mandatory and should not be used as an instrument of planning policy. In particular, it states that the guide is purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location. Although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design.

Specialist computer software was applied to a detailed three-dimensional model of the site and both 'existing' and 'consented' surrounding contexts, to establish the vertical sky component (VSC), no sky line / daylight distribution (NSL) and annual probable sunlight hours (APSH) based on room layout and windows dimensions of adjoining properties. It was considered by LBW that the assessment methodology was 'robust' (ref. paragraph 8.9 of Case Officers Committee Report dated 19th October 2016).

The daylight and sunlight assessments on external neighbours was undertaken to consider two scenarios. The first looked at the existing baseline which included all the buildings currently located on each of the adjoining sites at the time of the application. The second assessment considered the future baseline site conditions assuming each of the consented developments on the adjoining sites being built.

As this dual-scenario approach was considered acceptable by LBW, it is anticipated that the same approach would be adopted in respect of any future planning application for the site.

The Committee Report for the extant planning permission concluded the following:

"17.6 The residential amenity of the existing and future occupiers which surround the site will not be significantly affected. Having considered these in detail the impacts are not considered to be of a magnitude which would warrant refusal of the application."

"17.12 It has been demonstrated that the living conditions of future occupiers of adjoining sites with extant planning permissions would not be significantly affected in respect of outlook, privacy and access to daylight/sunlight or overshadowing to amenity areas. The scheme broadly complies with the BRE criteria and any minor technical deviations would be considered acceptable in line with the overall intentions of the BRE criteria."

The Proposed Development has currently been designed to increase the number of new homes on the Site and as a result there will be areas where the height and form of the buildings will extend beyond the external envelope of the Consented Scheme. This is particularly evident in respect of Block A, which is located along Sleaford Street and closest to Battersea Park Road. There are, however, some other elements of the Proposed Development that are smaller than the Consented Scheme in areas (particularly Block B) which will allow for some increased daylight and sunlight permeability through the centre of the site.

In daylight and sunlight terms, there are a number of unique characteristics that define the site and materially influence the ability of the neighbouring buildings to strictly adhere to the BRE Guidance. Firstly, the site is situated in the Vauxhall, Nine Elms & Battersea Opportunity Area and is clearly allocated within the development plan for high density development which necessitates the provision of new buildings that are of an entirely different form to the existing, low-rise units which occupy the site. If the Proposed Development is to match the height and proportions of the existing surrounding buildings, as well as the consented developments within the Opportunity Area, then it is inevitable that there will be alterations in daylight and sunlight which exceed the BRE recommendation. Those recommendations are of course predicated upon a low rise, suburban environment; characteristics which are clearly absent from the Vauxhall, Nine Elms and Battersea Opportunity Area (VNEBOA) generally.

Secondly, the main sensitive receptor surrounding the site (Viridian Apartments) has windows directly overlooking the site, close to the boundary and arguably taking more than its fair share of light from across the site. The vast majority of the windows are heavily obstructed by a combination of deep balconies and privacy screens which materially limit the access of light to the windows below, making them reliant on light from a low angle across the site. This of course creates a significant burden on the site as there is clearly an expectation for high density buildings which will interfere with the lower angles of sky. The BRE guidance therefore needs to be applied in the flexible and pragmatic way in which it was intended as an overly strict adaptation would fail to take account of the influencing factors which define this site.

These characteristics were acknowledged by LBW when assessing the daylight and sunlight effects upon the neighbouring buildings, and they ultimately concluded that the resultant levels were acceptable in the context of the urban location in which the site is positioned, despite some significant departures from the default BRE assessment criteria.

It is considered that overall, whilst there may be instances where daylight and sunlight effects exceed those already considered acceptable by the Consented Scheme, the general rate of compliance against the BRE assessment criteria will remain largely comparable and that there should not be any material difference in the conclusions drawn in respect of the amenity provision of existing and future occupiers which surround the site.

Given that no EIA was required in respect of the extant planning permission for the site, and the overall daylight, sunlight and overshadowing effects were not considered to be significant by the LPA, it is our view no EIA assessment should be required in respect of the future planning application for the site.

Yours Sincerely

Matt Harris
Director
For and on behalf of Point 2

APPENDIX 5
Ecology

1.0 Executive Summary

1.1 JFA Environmental Planning were commissioned by Superscheme Ltd to undertake an Ecological Impact Assessment (EcIA) of a planning application for a new block of student accommodation at Battersea Park Road, London.

1.2 The desk study found no designated sites or notable habitats are within or immediately adjacent to the site. All designated sites found within 1km of the site will not be adversely affected by the development, due to the distance from the site, lack of habitat or aquatic connectivity to the site, size of the site and the densely urban nature of the area.

1.3 The extended Phase 1 habitat survey found the development site consisted of mature scattered trees, sparse scatted scrub, tall ruderals, several prefabricated buildings, hardstanding. The loss of the trees will result in an significant adverse effect at the local level, therefore appropriate replacement planting will be put in place. All other habitats on site are of low ecological importance and the loss of these habitats will not result in any significant adverse ecological effects.

1.4 The site has limited potential to support protected or notable species including nesting birds, commuting bats and the occasional commuting hedgehog. No significant adverse effects on these species are anticipated by the development. Mitigation is advised to prevent breaches in legislation.

1.5 Birds may nest in scrub habitat immediately offsite to the south of the site or in the scattered trees to the northeast and northwest of the Bookers building. However, no evidence of breeding birds or historic nests were found at the time of the survey. Trees should either be removed outside of the bird nesting season (March-August) or check immediately prior to felling by a suitably qualified ecologist. The buildings and trees on site currently offer negligible potential for roosting bats. Linear features such as scattered trees to the north and the railway line to the south of the site have the potential to provide flight paths and bat species adapted to the urban environment may commute through and adjacent to the site. Mitigation measures to minimise the impact of the development on bats should include a lighting scheme to eliminate excess light spillage.

1.6 Ecological enhancements including the provision of bat and bird boxes have been advised to increase the biodiversity importance of the site in line with National Planning Policy Framework (NPPF) v3.

APPENDIX 6
Flood Risk and Drainage

Flood Risk & Drainage Screening Assessment

Battersea Park Road

Client:	Watkin Jones
Document Type:	Report
Document No.:	956-ACE-ZZ-XX-RP-C-1000
Revision:	001
Date:	28/01/2022

Version History

This report has been prepared by Apex Consulting Engineers with all reasonable skill, care and diligence, within the best practice and guidance current at the time of issue, within the scope of works which have been agreed with the client.

This report is confidential to the client and Apex Consulting Engineers accepts no responsibility whatsoever to third parties to whom this report, or any part thereof is presented, unless this is formally agreed in writing by a Director of Apex Consulting Engineers before any reliance is made. Any such party relies upon the information at their own risk. Apex Consulting Engineers disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.

Revision	Date	Notes	Prepared by	Checked by	Approved by
001	28/01/2022	First Issue	Keelan Serjeant	George Boden	Lee Fisher

Contents

1. Flood Risk and Drainage

Introduction

1.1 Development schemes have the potential to impact on the water environment through effects on surface water quantity, quality and flood risk. The construction and operation of the Proposed Development could result in the mobilisation of contaminants into surface waters which could impact the quality of the receiving waters resulting in an effect on ecological receptors, potable water resources and amenity users.

1.2 In general, developments can also impact flood risk by increasing surface water runoff rates from the development site to downstream receptors. In locations where there is a risk of flooding it is important to design development to ensure that it remains safe over its operational lifetime and that it does not increase flood risk to other nearby potential sensitive receptors.

1.3 This section of the screening report summarises the information gathered to date on the baseline hydrology conditions at the Site. Using this information, the potential for likely significant effects from the Proposed Development during the construction and operational phases is considered.

Assessment Methodology and Significance Criteria

1.4 In order to establish the environmental impact of the Proposed Development on flood risk and drainage of the Application Site and its immediate environs, it will be necessary to undertake the assessment in a number of stages.

1.5 The initial stage comprised a desk study review of available information in order to determine (where possible) Site conditions in terms of water features (both surface and ground), water quality, flood risk and drainage.

1.6 The study area used for this assessment will include both the Site and its nearby relevant hydrological features (extending to at least to 2 km from the Site), including the catchments of local watercourses, surface water features and dependant habitats. It also includes hydrogeological features, including underlying geology, aquifers and nearby groundwater dependent features.

1.7 A Flood Risk Assessment (FRA) and Drainage Strategy will be carried out for the Proposed Development in accordance with guidance contained in the National Planning Policy Framework (NPPF) and associated Planning Policy Guidance (PPG).

1.8 The FRA will identify and assesses the risks of all forms of flooding to and from the development and will demonstrate show these flood risks would be managed so that the development remains safe throughout its lifetime, taking climate change into account.

1.9 The Drainage Strategy will include an assessment of the existing, proposed surface water drainage of the Site and will also include a SuDS Strategy for the Proposed Development.

1.10 Hydrological systems are in a state of constant flux. Two main influences on the hydrology of the Site have been identified, namely land use and climate change.

1.11 Climate is also variable, with observed historical and predicted future changes in global climate due to a combination of both natural and human causes. Projections of future climate change in the UK indicate more frequent, short-duration, high intensity rainfall and more frequent periods of long duration rainfall

1.12 Guidance included within the NPPF recommends that the effects of climate change are incorporated into FRA using guidance. Recommended precautionary sensitivity ranges for peak rainfall intensities and peak river flows are outlined in the Flood risk assessments: climate change allowances guidance. The FRA and Drainage Strategy will assess the effects of climate change as per the guidance.

1.13 The assessment will be supported and informed through consultation with various stakeholders, including the Environment Agency, the Local Planning Authority (LPA) the Lead Local Flood Authority (LLFA) and Sewerage Undertaker, were required. Reference will also be made to relevant national and local drainage / flood risk planning and legislative policy.

1.14 The significance of any identified effect during both the construction and operational phase of the development will ultimately be determined with regard to the status, extent or spatial scale, duration, probability / likelihood and magnitude of the impact and the sensitivity of the receptor.

1.15 The level of the effect and whether those effects identified are considered to be significant will be established through the evaluation of the above elements as informed by the baseline conditions and will ultimately be determined through professional judgement.

Characterisation of Effect

1.16 The purpose of the EIA is to identify the likely 'significance' of environmental effects (beneficial or adverse) arising from a development. In broad terms, environmental effects are described as:

- Adverse – detrimental or negative effects to an environmental resource or receptor;
- Beneficial – advantageous or positive effect to an environmental resource or receptor; or
- Negligible – a neutral effect to an environmental resource or receptor.

1.17 Effects have been assessed in terms of:

- The magnitude of the impact – the degree of alteration (both positive and negative) from the baseline state; and
- The sensitivity of the receptor(s) subjected to the impact –this may relate to the value of a resource and the reversibility of impacts.

1.18 Any effect of Moderate or Major significance is considered to represent a likely significant effect for the purposes of the EIA Regulations. Significance of effects would be considered before and after mitigation.

1.19 The criteria for determining magnitude of impact is set out below in Table 1.1. Magnitude of impact, based on the change that the Proposed Development would have upon the resource/receptor, is considered within the range of high, medium, low, negligible. Consideration is given to scale, duration of impact/effect (e.g. for construction, short-term for 1-2 years, medium-term for 3-5 years, long-term for 5 years and greater, and permanent, dependent upon project timeframes) and extent of Proposed Development.

1.20 The sensitivity of the receiving environment together with the magnitude of the effect defines the significance of the effect prior to application of mitigation measures as outlined within Table 1.2.

1.21 Professional judgement is used to assess the findings in relation to each of these criteria to give an assessment of significance for each effect. This approach has been used to inform the assessment of predicted effects.

Table 1.1: Magnitude of Effects and Criteria

Magnitude of Effect	Criteria
High	Total loss or major/substantial alteration to elements/features of the baseline (pre-development) conditions such that the post development character/composition/attributes will be fundamentally changed.
Medium	Loss or alteration to one or more elements/features of the baseline conditions such that post development character/composition/attributes of the baseline will be materially changed.
Low	A minor shift away from baseline conditions. Change arising from the loss/alteration will be discernible/detectable but the underlying character/composition/attributes of the baseline condition will be similar to the pre-development.
Negligible	Very little change from baseline conditions. Change not material, barely distinguishable or indistinguishable, approximating to a 'no change' situation.

Table 10.2: Degree of Sensitivity Criteria

Magnitude of Effect	Criteria
High	The receptor/resource has little ability to absorb change without fundamentally altering its present character or is of international or national importance.
Medium	The receptor/resource has moderate capacity to absorb change without significantly altering its present character or is of high and more than local (but not national or international) importance.
Low	The receptor/resource is tolerant of change without detrimental effect, is of low or local importance.
Negligible	The receptor/resource can accommodate change without material effect, is of limited importance.

1.22 Significance of effect is evaluated as a combination of the sensitivity of the receptor and the magnitude of change the development results in.

1.23 Likely effects are therefore concluded to be of major, moderate, minor or not significant. The shaded boxes in Table 1.3 represent effects considered to be significant in terms of the EIA Regulations. Although the matrix in Table 1.3 is designed to demonstrate an objective rationale to reach a conclusion about the potential significance of impact a degree of professional judgement is a key element in the evaluation process. Table 1.4 provides details of the significance descriptors.

Table 1.3: Significance of Effect

Magnitude of Effect	Sensitivity of Receptor			
	High	**Medium**	**Low**	**Negligible**
High	Major	Major	Moderate	Negligible
Medium	Major	Moderate	Minor	Negligible
Low	Moderate	Minor	Minor	Negligible
Negligible	Negligible	Negligible	Negligible	Negligible

Table 1.4: Significance Descriptors

Significance	Criteria
Major	Very large or large change in environmental conditions. Effects, both adverse and beneficial, which are important considerations at a national to regional level because they contribute to achieving national / regional objectives, or, likely to result in exceedance of statutory objectives and/or breaches of legislation.
Moderate	Intermediate change in environmental conditions. Effects that are likely to be important considerations at a district to local level because they contribute to achieving local objectives, or may result in exceedance of local statutory objectives and/or breaches of legislation.

Minor	Small change in environmental conditions. These effects may be raised as local issues but are unlikely to be of importance in the decision-making process.
Negligible	No discernible change in environmental conditions. An effect that is likely to have a negligible or neutral influence, irrespective of other effects.

Baseline Conditions

1.24 This section identifies the current hydrology, flood risk and drainage conditions of the Site and the study area.

Topography

1.25 The Site is relatively flat with a ground level at circa 3.90 metres Above Ordnance Datum (m AOD).

Hydrology

1.26 The River Thames is located approximately 300 m to the north of the Site.

Rainfall

1.27 The Site is located within an area of low rainfall. The 1961-1990 Standard Average Annual Rainfall (SAAR) for the Site as recorded in the FEH web service is 600 mm per annum. The UK national average is 832 mm per annum.

Geology / Hydrogeology

1.28 The BGS Geological Maps indicates that the bedrock underlying the Site consists of the Thames Group - clay, silt, sand and gravel. The superficial deposits consist of Alluvium - clay, silt and sand.

1.29 The bedrock deposits are designated as an Unproductive Aquifer. These are rock layers or drift deposits with low permeability.

1.30 The superficial deposits are designated as a Secondary A Aquifer and a Secondary Undifferentiated Aquifer.

1.31 Secondary A Aquifers consists of permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers.

1.32 The Secondary Undifferentiated Aquifer is assigned where it is not possible to attribute either category A or B to a rock type. In general these layers have previously been designated as both minor and non-aquifer in different locations due to the variable characteristics of the rock type.

1.33 The Site is located within a Environment Agency Inner Catchment Source Protection Zone (SPZ) 1.

Flood Risk

1.34 Flooding from the River Thames poses the primary flood risk to the Site and surrounding area. The flood risk from the River Thames at this location is predominately tidal influenced.

1.35 A review of the Environment Agency's Flood Zones indicates that the Site is located within Flood Zone 3 and therefore has a 'high probability' of flooding, with a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

1.36 However, the Site currently benefits from existing flood defences measures and is identified as being located within an area benefiting from flood defences. Therefore, the actual flood risk posed to the Site is low and can be considered a residual risk due to a breach or overtopping of the existing flood defences.

Potable Abstractions

1.37 There are 22 licensed potable water abstractions within 2 km of the Site extracting more than 20 cubic metres of water a day and includes active and historical records. The data may be for a single abstraction point, a stretch of watercourse or a larger area.

Surface Water Abstractions

1.38 There are no licensed surface water abstractions for sites extracting more than 20 cubic metres of water a day and includes active and historical records within 2 km of the Site. The data may be for a single abstraction point, a stretch of watercourse or a larger area.

Groundwater Abstractions

1.39 There are 95 licensed groundwater abstractions within 2 km of the Site extracting more than 20 cubic metres of water a day and includes active and historical records. The data may be for a single abstraction point, a stretch of watercourse or a larger area.

Licensed Discharges to Controlled Waters

1.40 There are 23 licensed discharged to controlled waters within 2 km of the Site. These cover discharges of treated or untreated effluent to controlled waters under the Water Resources Act 1991.

Water Quality

1.41 The WFD surface and groundwater water quality information for the Site is shown in Table 1.5. At this stage no WFD water quality information is available for surface water or groundwater bodies.

Table 1.5: WFD Catchments

Location	Type	Water Body Catchment	Operation Catchment	Management Catchment
On Site	Coastal Catchment	Not part of a WFD catchment	Land area part of London Management Catchment draining to the Tidal Thames	London

Ecological Designations

1.42 The designated sites located within 2 km are shown in Table 1.6.

Table 1.6: Ecological Designations

Location	Name	Designation
589m W	Battersea Park Nature Areas	Local Nature Reserve

Sensitivity of Receptors

1.43 Based on the baseline conditions presented above, Table 1.7 presents the sensitive receptors which have been considered in the following assessment, along with their sensitivity to change.

Table 1.7: Identified Receptors

Source/Medium	Receptor	Sensitivity	Description
Water Quantity	Construction workers	Low	Flooding may impact upon workers during the construction phase, but their sensitivity is lowered as a result of their competency in their role as well as operating in teams and/or prescribed systems.
	Future Site residents	Medium	Residents/users of the Site generally have little awareness of flood risk and residents vulnerability is high given their

			presence overnight (via sleeping accommodation).
	Residents/users of the surrounding area	Medium	Residents/users of the surrounding areas generally have little awareness of flood risk and residents vulnerability is high given their presence overnight (via sleeping accommodation).
Water Quality	Watercourses	Medium	Any water quality issues would only be felt over short distance of the watercourses compared to the overall length of the watercourses. Water quality issues would also be diluted rapidly within the watercourses.
Flood Risk (all sources including river/tidal, surface water, groundwater, etc.)	Construction workers	Low	Flooding may impact upon workers during the construction phase, but their sensitivity is lowered as a result of their competency in their role as well as operating in teams and/or prescribed systems.
	Future Site residents	Medium	Residents/users of the Site generally have little awareness of flood risk and residents vulnerability is high given their presence overnight (via sleeping accommodation).
	Residents/users of the surrounding area	Medium	Residents/users of the surrounding areas generally have little awareness of flood risk and residents vulnerability is high

			given their presence overnight (via sleeping accommodation).

Potential Effects

1.44 Potential effects that may arise during the construction phase of the Proposed Development and operation of the Proposed Development are outlined below:

- Water Quantity - due an increase in impermeable area
- Water Quality - suspended fine sediments/chemical spillages
- Flood Risk - impact on construction works, future Site residents, residents/uses of the surrounding areas

Water Quantity

1.45 If unmitigated, the volume and rates of surface water runoff from the Proposed Development could increase with the potential for downstream adverse effects, in terms of increasing flood risk to off-site locations through the surcharging of waterbodies and/or sewerage systems.

1.46 The sensitivity is low and the magnitude of effect is medium. Therefore, without mitigation measures temporary increases in impermeable area could have a **minor to moderate adverse** effect. Any issues would only be felt over short distance on a local level of the watercourses compared to the overall length of the watercourses would be felt for the short term and would be reversible.

Water Quality

1.47 The water environment and the flora and fauna that it supports may be adversely affected by excessive levels of fine sediment contained within surface water runoff originating from construction activities associated with the Proposed Development. Furthermore, the construction activities would involve the excavation and movement of soil / ground at the Site and therefore increase the potential for leaching of pollutants into surface water receptors.

1.48 Runoff laden with fine sediment is principally generated by rain falling onto land that has been cleared of any vegetation and the ground potentially compacted, preventing infiltration. Other potential sources of water containing high levels of fine sediment at the Site include runoff from material stockpiles, dewatering of excavations, mud on Site and local access roads, and generated as part of the construction works themselves (e.g. vehicle washing).

1.49 Generally, excessive fine sediment in runoff is chemically inert and affects the water environment through smothering of riverbeds and plants, changing water quality (e.g. increased turbidity); consequently it can have physical impacts on aquatic organisms. There is also the potential for fine sediments to impact the chemical status of water bodies.

1.50 Without mitigation in place the watercourses would be susceptible to sediment laden water affecting water quality. Suspended fine sediment has the potential effect fisheries and cause a measurable decrease in ecological and chemical quality on the nearby watercourses, although this would only be felt over short distance of the watercourses compared to the overall length of the watercourses. Suspended fine sediment would also be diluted rapidly within the watercourses.

1.51 A number of potentially polluting materials may be used during the construction phase. These include oils, diesels, fuels, hydraulic fluids, cement / concrete, heavy metals / metalloids, bentonite, solvent / paints and flocculants etc. The accidental spillage of these may result in the contamination of surface water or groundwater.

1.52 Chemical spillages have the potential effect fisheries and cause a measurable decrease in ecological and chemical quality on the nearby watercourses, although this would only be felt over short distance of the watercourses compared to the overall length of the watercourses. Chemical spillages would be diluted rapidly within the watercourses.

1.53 If unmitigated, particularly during the site construction phase. Surface water discharges have the potential to contain pollutants generated as part of construction and operation activities, whilst foul water discharges could adversely affect water quality in receiving waterbodies if not appropriately treated.

1.54 The sensitivity is medium and the magnitude of effect is medium. Therefore, without mitigation measures water quality issues could have **moderate adverse** effect on watercourses. Any issues would only be felt over short distance on a local level of the watercourses compared to the overall length of the watercourses. Water quality issues would also be diluted rapidly within the watercourses for the short term and would be reversible.

Flood Risk

1.55 The Proposed Development could be affected by flooding and could result in the loss and impedance of overland flood flows routes, floodplain storage, and loss / disturbance to existing surface waterbodies, i.e. the temporary or permanent obstruction of stream and ditch channels. Such potential effects could impact on the flood risk posed on-Site and to downstream third-party land.

1.56 Any alteration of ground levels or obstructions placed within areas considered to be at risk of flooding from surface water during construction

therefore has the potential to increase flood risk to the Site and elsewhere. Additionally, on and off-site flood risk may increase due to increased runoff due to soil compaction on-site. Any flooding effects resulting from temporary construction activities are likely to be very localised within the Site itself and so the increase in flood risk during construction is considered to have a low magnitude of effect.

1.57 Therefore, without mitigation the increase in flood risk during construction is considered to have a **minor to moderate adverse** effect.

Mitigation

1.58 The design of the Proposed Development will include a Drainage Strategy and attenuation storage to ensure that discharge from the Site would be at a runoff rate which would not increase flood risk elsewhere. The Drainage Strategy will include an assessment of the existing, proposed surface water drainage of the Site and will also include a SuDS Strategy for the Proposed Development.

1.59 The Drainage Strategy will provide adequate attenuation to ensure that there would be no increase in peak surface water runoff. The Drainage Strategy will also make an allowance for increase in rainfall intensity resulting from climate change throughout the lifetime of the Proposed Development. As a consequence of limiting the rate of discharge from the Site, at times of heavy rainfall the volume of water leaving the Site will be significantly less than that currently draining from it.

1.60 The Drainage Strategy will be developed to not only provide flood risk benefits but also to provide water quality benefits. Sufficient treatment train components will be incorporated for both the sensitivity of the receiving watercourse and the nature of the development, as well as sediment control methods. These are designed to ensure that the receiving environments are not put at risk of pollution by the Proposed Development.

1.61 A Construction Environmental Management Plan (CEMP) or equivalent would be prepared and agreed with the waste planning authority. The CEMP would set out the methods, including the minimum requirements as agreed between the construction contractor and the waste planning authority, by which construction will be managed to avoid, minimise and mitigate any adverse effects on the water environment.

1.62 Contractors undertaking earthworks would develop risk assessments and method statements covering all aspects of their work that have the potential to cause physical damage to structures (e.g. water supply and sewerage infrastructure), mobilise large quantities of soil / sediment or block drains / watercourses. Earth moving operations would be undertaken in accordance with BS 6031:2009 Code of Practice for Earthworks.

1.63 Good practice guidance on erosion and pollution control would be followed during the construction and operation phases of the Proposed Development,

e.g. CIRIA Environmental Good Practice on Site (C692) and Control of Water Pollution from Construction Sites (C532).

1.64 The finished floor levels of the buildings will be raised as part of the planning application to reduce the flood risk posed to the Proposed Development.

1.65 To make the buildings more resistant to seepage the following measures will be incorporated. All buildings will be constructed from hard wearing materials and will be sealed against water ingress. To improve the buildings resilience to flooding, the following measures will be incorporated: all electrical wiring, switches, sockets, socket outlets, electrical, and gas meters etc. will be located a minimum of 450 mm above the finished floor level.

1.66 The Site is located in a flood risk area; therefore, the buildings will participate in the Environment Agency's flood warning telephone service. The Site will register contact details with the Environment Agency's Flood Warning Service (Floodline 0345 988 1188) in order to receive Flood Warnings.

1.67 A Flood Plan outlining the precautions and actions to be taken when a flood event is anticipated to help reduce the impact and damage flooding may cause will be developed including the identification of safe access and egress routes.

1.68 The implementation of the mitigation measures will result in a **no significant residual effects**.

APPENDIX 7
Ground Conditions and Contamination

Geotechnical Update

SITE CONTEXT (DESK STUDY INFORMATION)

Mapped Geology

Mapped drift deposits are Alluvium (clay, silt, sand & gravel) with Kempton Park Gravel (sand & gravel) in the north-west. Bedrock geology is mapped as London Clay; however, there is a possibility of localised deepening of drift deposits due to scour hollows/pingos which can result in the drift deposits lying directly atop the Lambeth/Thanet/Chalk geology in localised areas.

No mining issues anticipated.

Current Use and Features

Booker wholesaler premises in the north; former BMW showroom in the south with external areas of car parking.
High pressure sewer main crosses the north; the location of which needs confirmation via survey.

UXO
Site is at medium risk of UXO; all site investigation works and future excavation works will be done under supervision by a UXO engineer.

Site History

Terraced housing from 1800s until some minor redevelopment with detached units in the south by 1947. Site is vacant by 1970s, with redevelopment as per current layout by 1984. Surrounding land uses throughout history include railway land, graveyard, gas works, water works (including reservoir and filter beds), garages & pumping station.

Aquifers

Drift deposits: Secondary A and Secondary Undifferentiated aquifers. London Clay is an unproductive aquifer. However, a potable water abstraction is present 175m north-west, likely extending into the underlying chalk (Principal Aquifer Source Protection Zone 1).

Landfilling

No recorded landfill sites within 250m where waste has been buried. However, areas of possible landfilling associated with development of the surrounding area are present.

GROUND INVESTIGATION

Fieldwork undertaken to date comprised 13no. WS boreholes to between 1.1m and 5.5m with subsequent geotechnical and contamination analysis.

Ground Conditions Encountered by Tier

Concrete (reinforced) to between 0.2m and 0.4m (absent in north).
Locally, macadam overlies concrete (0.05m to 0.15m thick).

Made ground comprises very gravelly sand/gravelly clay with cobble of housebrick. Anthropogenic materials include asphalt & clinker. Maximum depth recorded was >5.0m in WS103m.

Strong hydrocarbon odour noted in WS106 1.1-1.3m.

Natural ground generally comprised medium dense gravelly sand (Kempton Park Gravel Formation). Clay (possible alluvium) encountered in WS102 from 2.65m to 3.10m.

Contamination

Elevated concentrations of lead, mercury, PAHs.
Eight out of 14 samples tested positive for asbestos.
Leachable PAHs present in soils above WQS values, but are not considered a significant risk within the SI report by Tier.

Gas

Based on monitoring to date (4 visits), site has been classified as CS1 (no measures required). However, additional monitoring is required (at least 2 further visits).
Use of organic-vapour resistant membranes also recommended due to localised TPH.
No radon measures are required.

ANTICIPATED REMEDIATION

The following remediation measures are likely to be required:

- 600mm clean soil cover in gardens/landscaped areas, plus an underlying membrane
- Site-wide turnover with subsequent screening and crushing of suitable materials to enable removal of obstructions, any contamination hotspots and enable preparation of the ground for a piling mat, floor slab construction and landscaping
- Assessment of all imported materials to ensure suitability of use.

ADDITIONAL WORKS REQUIRED

- Investigation beneath building footprints (post-demolition), including further excavation around the location of WS106 where evidence of hydrocarbon contamination was encountered.
- Detailed geotechnical investigation via drilling of cable percussion boreholes and geotechnical analysis of samples retrieved.
- Controlled waters risk assessment including determination of the depth to, and thickness of, the London Clay which acts as a protective barrier to the underlying basal sands/chalk aquifer (Source Protection Zone 1). This will require drilling of borehole beyond the anticipated depth of piles, and permeability testing on samples of clay recovered. Liaison with the Environment Agency is advised prior to finalising the require scope of works.
- Confirmation of the location of the existing sewer.
- Additional gas monitoring.

- Production of updated reports and a Remediation Strategy. Depending on the ground conditions encountered, a CEMS report (Construction Environmental Management Strategy) may also be required.

CONCLUSION

The nature and level of the risks associated with ground contamination are unlikely to have changed from those assessed at the time of the previous application. It was concluded at that time that these risks could be made acceptable through site investigation, risk modelling, remediation and routine health, safety and environmental best practice, such that any residual effects were unlikely to be significant. That is still considered to be the case, by means of the measures outlined above, such that ground contamination is not considered to require a need for EIA.

APPENDIX 8
Noise and Vibration

Philip Dunbavin Acoustics Ltd
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Lymm
WA13 0ER

ACOUSTIC CONSULTANTS

DESIGN NOTE

Project: Battersea Park Road, London

Description: EIA Screening Opinion, Noise and Vibration

Prepared By: Edmund Evenden BSc (Hons) MIOA
Director of PDA Ltd

Date: 04/02/2022

Ref: J003701-5452-ECE-01

1.0 INTRODUCTION

This note has been prepared to provide a response to the Noise and Vibration impact of the proposed Battersea Park Road development, as part of the Environmental Impact Assessment (EIA) scoping review.

2.0 SITE DESCRIPTION

The proposed scheme comprises of up to 21 storey in five blocks containing up to 750 student beds and 80 C3 units. The scheme will also consist of 550m^2 of commercial floor space.

The site is bounded to the northwest by Battersea Park Road and this forms the dominant noise climate within the site location. The site is also bounded by a road to the North East, traffic levels on this road are reduced in comparison with the Battersea Park Road. To the south east of the site is an elevated railway line. To the south west of the site is existing residential use and new residential use currently in construction.

3.0 EIA SCREENING/SCOPING

1. In the absence of mitigation, how likely is the development to give rise to significant effects relating to your topic?

   (a) Likely

   (b) Unlikely

   (c) Not currently known

Reply

Likely

2. If (a) or (c), topic cannot be scoped out – go to 4.

3. If (b), topic can be scoped out – **please provide reasoned justification in the form of a short note**.

4. With the adoption of mitigation, how likely is it that the residual effects relating to your topic would cease to be significant? Same options (a)-(c) as above.

Reply

Likely

5. If (a), topic can be scoped out – **please provide reasoned justification in the form of a short note**, which should:

   - describe the mitigation likely to be adopted and how it would be secured (e.g. planning condition or incorporated into design); and

   - specify what non-EIA studies are proposed to be submitted in any event.

Reply

The likely predominant issue is likely to be the impact of existing noise sources on the proposed residential use of the scheme.

It is proposed to undertake an ambient noise survey to determine the existing noise climate. Using this data suitable mitigation can be developed that will attenuate the noise ingress into habitable rooms. Typical mitigation would comprise of increased acoustic performance associated with windows and ventilation inlets. This assessment will be undertaken in compliance with the requirements of BS8233:2014 "Guidance on sound insulation and noise reduction for buildings".

It would be our expectation that limiting noise levels within habitable rooms would be conditioned.

Other potential impacts are associated with noise emissions from the site such as building services and their impact on noise sensitive uses external to the site. As described above it is proposed to undertake a noise survey to determine the existing noise climate at the site. Using this data limiting levels will be developed to control noise emission from the site. This will be undertaken in accordance with the guidance contained within BS 4142:2014+A1:2019 "Methods for rating and assessing industrial and commercial sound".

It would be our expectation that the noise levels associated with plant noise emissions from the site would be conditioned.

In addition it should be noted that at the planning stage detailed information regarding specific plant items or noise sources will not be known and therefore it is likely that suitable mitigation measures will be developed during the detailed design. Typical mitigation measures would include shielding, increased acoustic performance of the building envelope, enclosures and silencers.

The scheme is in close proximity to a railway line and therefore there is potential for Vibration impact. Previous assessment on this site have indicated that vibration from train movements have a less than low probability of being the cause of adverse comment and are presently below those at which vibration levels are perceptible. Therefore, vibration are unlikely to give rise to significant effects.

6. If (b) or (c), topic cannot be scoped out and will become an **EIA topic**.

7. For EIA topics, provide a **scope and methodology statement** that identifies, inter alia, as relevant for each topic:

- the spatial and technical scope;
- relevant guidance;
- methodology;
- information sources;
- modelling techniques (where relevant);
- proposed consultation; and
- title of deliverable.

Reply

Not applicable

8. Noting the PPG advice on **proportionality**, topics should be "scoped down" where it is reasonable to do so, with an explanation provided.

Reply

Not applicable

APPENDIX 9
Socio-Economics

SOCIO-ECONOMICS: EIA SCREENING TECHNICAL NOTE

BATTERSEA PARK ROAD

PREPARED ON BEHALF OF WATKIN JONES

02 FEBRUARY 2022

THIS IS THE CONTENTS

1.0 INTRODUCTION

1.1 This technical note has been prepared by Montagu Evans on behalf of Watkin Jones Group ('the Applicant') in relation to the proposed redevelopment of a site on Battersea Park Road ('the Site') within the Nine Elms area of the London Borough of Wandsworth (LBW).

1.2 The purpose of this technical note is to provide an overview of the potential **socio-economic** effects that could arise from the Proposed Development, as well as the likelihood that these effects could be significant in EIA terms.

1.3 This technical note contains the following sections:

- Section 2.0 – Potential Socio-Economic Effects – explores the socio-economic effects which could reasonably be expected to arise as a result of the Proposed Development proceeding
- Section 3.0 – Baseline Conditions and Proposed Development – briefly describes baseline conditions within the study area, against which the potential significance of effects is measured
- Section 4.0 – Significance of Effects – provides a headline assessment of the significance of identified effects on sensitive receptors, based on professional judgement and limited impact assessment
- Section 5.0 – Conclusion – brings together the evidence presented in the preceding sections to determine whether a full socio-economic assessment is likely to be required

2.0 POTENTIAL SOCIO-ECONOMIC EFFECTS

SUMMARY OF CURRENT USES

2.1 The Site, as it stands today, is occupied by a Booker cash and carry unit and a vacant garage unit – previously occupied by BMW. The Booker unit currently sustains employment, though at a relatively low density due to the space-intensive nature of cash and carry operations. It is estimated that approximately 30 FTE jobs are currently sustained by Booker directly[1], plus a small number of additional indirect jobs within the supply chain. The Booker unit has a rateable value of £430,000, with a 2021/22 rates liability of approximately £220,000.

SUMMARY OF PROPOSED DEVELOPMENT

2.2 The Proposed Development incorporates the following accommodation:

- 750 Purpose Built Student Accommodation (PBSA) units
- 80 residential apartments (Use Class C3), of which:
  - 18 are 1 bed / 2 person
  - 13 are 2 bed / 3 person
  - 44 are 2 bed / 4 person
  - 5 are 3 bed / 5 person
- 550 sq.m (GIA) of commercial floorspace (assumed Use Class E)

POTENTIAL SOCIO-ECONOMIC EFFECTS

2.3 The Proposed Development, as described above, will result in the demolition of existing accommodation on the Site. This is expected to result in the following:

- Loss or displacement jobs from the Booker cash and carry (adverse); and
- Loss of business rates income (adverse).

2.4 Construction works to provide new accommodation are expected to lead to:

- Creation of temporary jobs during demolition and construction, in addition to apprenticeships and training opportunities (beneficial);
- Creation of contract opportunities for local businesses in the construction supply chain – creating indirect jobs and economic output (beneficial); and
- Induced spending of workers' earnings in the London economy, supporting further jobs and economic output (beneficial).

[1] Based on assumed floorspace of 3,209 sq.m (GIA), 85% NIA to GIA ratio, and an employment density of 90 sq.m (NIA) per FTE (from HCA Employment Densities Guide 3rd Edition – density value for Retail Warehousing).

2.5 On completion, the Proposed Development will provide primarily residential accommodation, alongside a small amount of commercial floorspace. This is expected to result in:

- Population Growth within the local area, up to a maximum of 1,026 people[2], which in turn will lead to:
  - Increased levels of household expenditure within the local area (beneficial);
  - Greater pressure on community and social infrastructure such as Schools and GP Surgeries (adverse); and
  - Increased pressure on existing public open spaces and/or exacerbation of existing open space deficiencies (adverse).
- Delivery of new homes and student accommodation, which in turn will:
  - Add to LBW's housing supply and help the Borough to meet its housing targets (beneficial);
  - Support the Higher Education sector in London (beneficial);
  - Reduce demand from students for HMOs within the Borough (beneficial); and
  - Generate new Council Tax receipts (beneficial).
- Delivery of new commercial floorspace, which will lead to:
  - Generation of new business rates receipts (beneficial); and
  - Creation of approximately 23 new permanent jobs[3] (beneficial).

POTENTIAL SENSITIVE RECEPTORS

2.6 On the basis of the potential effects described above, sensitive receptors are likely to include the following:

- Local residents of working age (potential loss/gain of employment);
- Local retail businesses (increased availability of resident spending within the local area);
- Local schools (availability of primary/secondary school places);
- Local GP surgeries (patient to GP ratios);
- Local open spaces (exacerbation of open space deficiencies);
- Local authority finances (net impact on business rates and council tax receipts);
- LBW's housing supply (affordability and meeting GLA targets);

2.7 The extent to which these receptors are likely to experience significant effects as a result of the Proposed Development proceeding is considered with reference to baseline conditions, which are briefly summarised in the next section.

[2] Based on maximum design capacity of C3 units and full occupancy of 750 student beds
[3] Based on an employment density of 20 sq.m per FTE

3.0 BASELINE CONDITIONS

STUDY AREA

3.1 For the purpose of this technical note, baseline conditions within a 1km radius from the Site have been taken into consideration. Where necessary data is not available at this spatial scale, data for LB Wandsworth and Greater London has been summarised.

SOCIO-ECONOMIC PROFILE

3.2 An estimated 37,600 people live within a 1km radius of the Site. Within this resident population, 27,500 are of core working age (16-64), an increase of 4,400 (19%) compared within 2011 (source: ONS, Mid-2020 Population Estimates).

3.3 A total of 13,000 jobs are located within the same 1km radius from Site. The most dominant sectors by number of jobs are Wholesale and Retail (31%), Administrative and Support Services (12%) and Construction (9%) (source: ONS Business Register Employment Survey).

3.4 As of the most recent official estimates (September 2021), approximately 5.3% of the working age population within LBW was unemployed, compared with a London average of 6.6%. An estimated 10,750 people were also claiming out of work benefits (source: ONS, Annual Population Survey / DWP, Claimant Count).

3.5 It is estimated that 3.3% of the population of LBW are full time students. Of the student population, it is estimated that a third live within HMOs (source: ONS, Census 2011).

HOUSING SUPPLY, AFFORDABILITY AND HOUSEHOLD SPENDING

3.6 According to the Department for Levelling Up, Housing and Communities (DLUHC) Housing Delivery Test (2021 Measurement), LBW was required to deliver 4,686 units over the last 3 years, but delivered 4,943 – 105% of the total.

3.7 The average (median-priced) property in LBW costs £665,000 – 18.7 times the median salary payable for jobs based within the Borough. Over the last 10 years, affordability has worsened rapidly, with the median property costing 11.8 times median earnings in 2010 (Source: ONS, Ratio of house price to workplace-based earnings).

3.8 On average, households within LBW spend £12,400 per annum on retail goods, £650 on leisure activities and £3,100 on Food & Beverage services away from the home (Source: Oxford Retail Consultants).

COMMUNITY INFRASTRUCTURE

3.9 In total, there are 8 primary schools and 1 secondary school located within 1km of the Site.

3.10 The primary schools have a combined capacity of 2,514, but currently have a total 2,062 pupils enrolled – indicating unused capacity of 452. Three schools are rated ‘Outstanding’ by Ofsted, four as ‘Good’ and one as ‘Requires Improvement’ (source: DfE).

3.11 The only secondary school within 1km – Pimlico Academy (within City of Westminster) – has capacity for 1,250 pupils, and a current enrolment of 1,206 – indicating spare capacity of 258 places. The nearest secondary school within LBW is Harris Academy Battersea (spare capacity of 79).

3.12 There are 4 GP Practices based within 1km of the Site, of which three have GP to Patient ratios below the benchmark of 1,800 stipulated by the Royal College of GPs. In aggregate, the four practices have a combined patient list size of 40,759, served by 23 FTE GPs – a ratio of 1,741 patients per GP (source: NHS Digital).

3.13 The Site is located within a built up part of Central London. However, it does benefit from relatively easy access to a number of green open spaces, including Battersea Park (approx. 600m from the Site boundary) and smaller parts such as Larkhall Park (650m) and Heathbrook Park (850m). The River Thames, a key natural asset within London, is located less than 400m from the Site boundary, with major public realm and connectivity improvements recently completed as part of the Battersea Power Station redevelopment (source: Ordnance Survey).

4.0 SIGNIFICANCE OF EFFECTS

4.1 The EIA Regulations (2017) do not directly refer to socio-economics. There is, however, a broader requirement to assess "in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development" on a number of factors, including 'Population and Human Health'.[4] Socio-economics therefore considers population and human health from the perspective of local demographics, the local economy (insofar as economic prosperity is directly linked to individual and community wellbeing), and social and community infrastructure.

4.2 Professional judgement is used to determine the potential significance of effects, with reference to the sensitivity of receptors and the level of deviation from baseline conditions.

LOCAL RESIDENTS OF WORKING AGE

4.3 The loss or displacement of approximately 30 permanent jobs sustained by Booker is expected to be largely offset by the provision of new commercial floorspace within the completed development, which though much smaller is likely to operate at a much higher employment density than the current cash and carry use. The likelihood of redeployment of current staff to other nearby Booker locations (or indeed within the wider Tesco estate) appears to be high, and in the event that Tesco/Booker was unable to retain the current staff, there are many other Wholesale and Retail sector employers based locally who are likely to be seeking new employees given current national labour shortages in the sector. Furthermore, additional jobs will be created in the operation and management of the Student Accommodation element of the scheme.

4.4 The construction of the Proposed Development could also create employment opportunities for local people, though these opportunities are expected to be relatively minor due to the small scale of the local construction sector relative to the size of the project.

4.5 In summary, effects on local residents of working age are not expected to be significant, and on balance are more likely to be neutral or beneficial than adverse.

LOCAL RETAIL AND LEISURE BUSINESSES

4.6 On completion, the proposed residential accommodation will be occupied by new residents to the area, who will bring with them spending power across a wide range of expenditure categories – which in turn has the potential to support local retailers and enhance the viability of local retail centres. Construction workers will also spend a proportion of their wages locally (e.g. by buying lunch or spending in local shops / hospitality venues after work), creating further local economic benefit.

4.7 In summary, effects on local retail and leisure are not expected to be significant, and are likely to be beneficial in nature.

[4] Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Regulation 4 (2) (a)

LOCAL AUTHORITY FINANCES

4.8 The current Booker unit has a rateable value of £430,000 per annum. Based on 2021/22 standard multipliers, this equates to an income of £220,000 per annum. Proposed employment floorspace within the Proposed Development is substantially smaller, and is therefore likely to attract a much smaller rates liability. This, however, is likely to be at least partially offset by the generation of council tax receipts from the residential aspects of the scheme, with further potential fiscal benefits arising from the freeing up of all-student HMOs (which are exempt from council tax) elsewhere within the borough through the provision of Purpose-built Student Accommodation on site.

4.9 Effects on local authority finances are therefore not expected to be significant, though likely to be minor adverse in nature.

LOCAL AUTHORITY HOUSING TARGETS AND HOUSING AFFORDABILITY

4.10 The Proposed Development will make a contribution to housing delivery within the Borough, adding 80 units to the supply directly, and potentially freeing up more homes currently used for student HMOs elsewhere in the borough indirectly. The level of supply proposed is not likely to have a discernible impact on housing affordability.

4.11 Effects on housing affordability and the ability of LBW to meet its housing targets are likely to be minor but beneficial, and not expected to be significant.

LOCAL SCHOOLS

4.12 The Student Accommodation element of the Proposed Development is unlikely to be suitable for parents, and has therefore assumed to yield no children (and therefore create no new demand for school places). The remaining residential element would, based on GLA's Population Yield Calculator, yield up to 6 children of primary school age and 1 child of secondary school age. The baseline analysis of school capacities demonstrated significant available capacity in local schools – both primary and secondary – far in excess of the capacity required to accommodate children living with the completed scheme.

4.13 On this basis, effects on local schools are likely to be negligible and not expected to be significant.

LOCAL GP SURGERIES

4.14 The Proposed Development has a maximum resident population (based on design capacities and 100% occupancy of PBSA units) of 1,026. However, students are typically guided towards GP practices aligned with their universities, or may remain registered with GPs closer to their parents' homes. As such, a requirement for 1,026 new patients to be enrolled with local GP practices represents an absolute worst case scenario.

4.15 The Baseline Conditions section concludes that excess capacity exists within local GP practices, on the basis that patient to GP ratios do not exceed benchmark levels. Based on current staffing levels, local GP practices could accommodate an additional 1,371 patients before exceeding the Royal College of GPs benchmark.

4.16 On this basis, effects on local GP Surgeries are likely to be minor adverse but not expected to be significant.

ACCESS TO OPEN SPACES

4.17 The proposed development will provide amenity spaces within and around the buildings, which represents an improvement compared with current site uses (much of the Site is currently enclosed by a fence, with access generally only available to Booker staff and members). As identified in the baseline conditions section, the Site benefits from its close proximity to a number of open spaces, including Battersea Park and the River Thames (including new open spaces on the riverfront at Battersea Power Station).

4.18 On this basis, effects on access to / accessibility of open spaces are not expected to be significant.

5.0 CONCLUSION

5.1 This technical note has briefly reviewed potential socio-economic effects arising as a result of the Proposed Development proceeding. This review has identified a number of potential sensitive receptors, however none of the identified socio-economic effects are expected to be significant.

5.2 On this basis, it is not expected that a full socio-economic assessment would be required for the Proposed Development.

FURTHER TECHNICAL WORK PROPOSED

5.3 The Applicant has commissioned the preparation of an Economic Statement and a Health Impact Assessment to accompany the forthcoming planning application. These two documents will further assist LBW in understanding key socio-economic outputs and outcomes associated with the Proposed Development, and provide further evidence of the potential impacts of the Proposed Development on population and human health, as well as the likely efficacy of mitigation and enhancement measures inherent in the design of the scheme.

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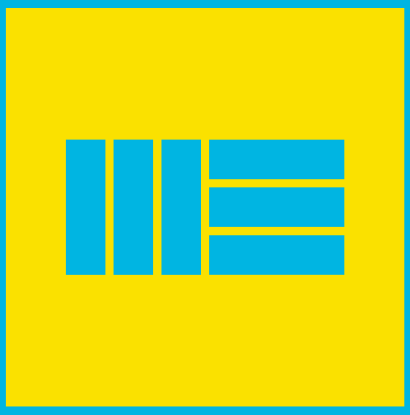

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APPENDIX 10
Heritage, Townscape and Visual Impact

ADVICE NOTE

TO

Peter Radmall Accociates

CC

N/A

FROM

Montagu Evans

DATE

3rd February 2022

SUBJECT

Environmental Impact Assessment Screening: Heritage, Townscape and Visual Impact

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The purpose of this advice note is to outline the heritage, townscape and visual impact matters relevant to an Environmental Impact Assessment (EIA) screening opinion for proposals at 41-49 and 49-59 Battersea Park Road (the 'Site'). The Site is located in the London Borough of Wandsworth (the 'Council' or 'LBW').

The existing Site comprises a warehouse and garage building. The two buildings are separated by surface level car parking. Both buildings are utilitarian in appearance and contribute very little to the amenity or urban design function of the area.

The Site is subject to an extant consent for comprehensive redevelopment (ref: 2015/6813) (the 'Extant Consent'), comprising:

> *Demolition of all existing buildings and construction of new buildings of between 5 storeys and 18 storeys, containing 307 residential units, business (Class B1) floorspace and flexible retail/restaurant and cafe/business floorspace (Class A1-A5 and B1), CHP basement, vehicle and cycle parking, plant and associated works, landscaping and a new access onto Sleaford Street.*

An EIA Screening Opinion (2015/5273) was submitted for the Extant Consent in September 2015. The Extant Consent was not considered to require a full EIA.

The revised proposals will follow the principles established by the Extant Consent. For example, the proposed number and layout of blocks A, B, C, D and E follows the Extant Consent. The building line remains stepped back from Battersea Park Road to allow for an improved public realm, pedestrian flows and allow for a link between the Linear Park to the east and Prospect Park to the west. The layout also reinforces link to the south of the site and Phase 4A of the Battersea Power Station.

Notwithstanding, the Proposed Development will seek to create an uplift in floorspace and, where appropriate, a betterment to the original design concept. For example, the heights of the tallest buildings are proposed to increase (21 floors as opposed to 18), although there has been a reduction to some lower parts of the scheme and reorientation of buildings to help improve the microclimate performance, visual amenity and townscape function.

This advice note concludes that the Proposed Development will have no impact upon the significance of heritage assets. It concludes that the Proposed Development will impact the townscape and amenity of visual receptors (people) in the area, although that impact will be beneficial to the character and function, and wholly commensurate with the emerging context of high density development in the Opportunity Area. The design has been refined to ensure that the Site is optimised, whilst delivering a balanced and attractive environment.

It is considered that the Proposed Development does not require a full EIA. The planning application would be supported by a standalone Heritage, Townscape and Visual Impact Assessment (HTVIA). 'Heritage' and 'Townscape and Visual' are to be treated as individual disciplines and separate assessments are to be provided in accordance with legislation, planning policy and best practice guidance.

Heritage

The (built) heritage assessment describes the significance of any heritage assets affected by the Proposed Development, including any contribution made by their setting. The heritage assessment will be carried out in accordance with the Historic England guidance documents GPA2 [1]and GPA3[2].

The Site is not located in a conservation area and does not comprise any heritage assets.

The closest heritage asset is the Grade II* listed Battersea Power Station, located circa 270m away to the north-west of the Site. The listed building and the Site are currently physically separated by land to the north of Battersea Park Road, which includes the recently completed Battersea Park Underground Station. Surrounding the station is further development associated with the wider Battersea masterplan.

The development approved within the wider Opportunity Area creates a significant physical and visual buffer between the Site and listed building. In views from the north bank of the Thames the Proposed Development is either occluded by the Power Station (and not seen above it) or seen obliquely as a peripheral feature and significantly subservient to the robust scale and distinctive skyline silhouette of the listed building. The Proposed Development is not considered likely to impact on the Grade II* listed building.

Battersea Dogs and Cats Home located on Whittington Lodge is the only other listed building located within a 500 radius of the Site boundary. Similarly, by virtue of the level of development in the intervening area, the Proposed Development is not considered likely to impact on the Grade II listed building.

The Proposed Development will have no impact upon the significance of heritage assets.

Townscape and Visual

The townscape assessment will consider the Proposed Development within its urban context, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces and the relationship between buildings and open spaces.

The visual assessment will consider the impact of the Proposed Development upon visual receptors. The assessment relates to how people will be affected by changes in views and visual amenity at different places, including publicly accessible locations. Visual receptors are always people (although usually visual receptors are defined according to use e.g. residential, business, road, footpath etc.), rather than landscape features.

The methodology for the townscape and visual impact assessment will be based on the principles set out in the third (2013) edition of 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA3)3, produced by the Landscape Institute with the Institute of Environmental Management and Assessment. Reference will also be made to national, regional and local guidance and policies.

The planning submission for the Extant Consent was accompanied by a total of 18 verified views. It is proposed that 10 of the 18 verified views be updated for this application; the remaining eight are considered obsolete due to the extent of development that has been consented and implemented in the intervening period since the Extant Consent was granted.

[1] Historic England (2015) Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment

[2] Historic England (2017) Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets

[3] Landscape Institute (2013) Guidelines for Landscape and Visual Impact Assessment (GLVIA3).

The initial assessment has considered views from the 2012 London View Management Framework and the 2014 Wandsworth Local Views SPD. Due consideration has also been given to the Westminster Metropolitan View 24. The assessment confirms that the Proposed Development would have no impact upon any strategic or designated views. For completeness, the planning application for the Proposed Development will be accompanied by verified views from LVMF view 15 (Waterloo Bridge) and LVMF view 17 (Hungerford Bridge). A mix of verified and non-verified views will be provided for views from the 2014 Wandsworth Local Views SPD and the Westminster Metropolitan View 24 to demonstrate no visual impact to sensitive receptors.

The remaining views consider the medium and local impacts. Due to the extent of development coming forward in the area, the extent of visibility is generally limited to views looking east and west along Battersea Park Road, plus some glimpsed views from tertiary routes to the north and south of the Site. The views are from land that has either an existing industrial character or which is undergoing transformative change towards residential-led high density development.

The Proposed Development will add to this emerging context. The design team has been cognisant of the townscape appearance and function, seeking to ensure that the Proposed Development was complementary to the emerging context. In particular, due consideration has been given to the intensity of development emerging along Battersea Park Road. The building line remains stepped back from Battersea Park Road to allow for an improved public realm, pedestrian flows and allow for a link between the Linear Park to the east and Prospect Park to the west. In addition, the layout and spacing of Blocks A and B has been prepared to ensure that clear views of sky may be obtained between the buildings.

At ground floor, the extent of commercial and communal frontages has been maximised to ensure activation and animation to the surrounding streets. The building form will frame a publicly accessible central park.

The Proposed Development will impact the townscape and amenity of visual receptors (people) in the area, although that impact will be beneficial to the character and function, and wholly commensurate with the emerging context of high density development in the Opportunity Area. The design has been refined to ensure that the Site is optimised, whilst delivering a balanced and attractive environment.

APPENDIX 11
Transport

vectos.

41 – 49 Battersea Park Road, Wandsworth
EIA Screening Note – Traffic & Transport

February 2022
216199/N04

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1. It is concluded that the effects relating to Traffic and Transport are unlikely to be significant and therefore do not merit a need for EIA or (in the event that EIA is required) the inclusion of this topic.

2. The site will be car-free in nature with the except of 11 Blue Badge parking spaces. The existing site is made up of the Bookers Wholesale Warehouse and the BMW Nine Elms garage. It is understood that the BMW garage has been relocated, therefore, only vehicle trips associated with the Bookers Wholesale Warehouse have been considered.

3. The Bookers Wholesale Warehouse currently comprises circa. 30 on-site car parking. Therefore, the proposed development will represent a reduction in car parking compared to the current uses on-site. The estimated level of vehicle trips associated with the development will be significantly lower than the current trips generated by the commercial uses on the site at present.

4. It is important to note that whilst vehicle trips will reduce, the quantum of pedestrian, cycle and public transport trips to the site will increase in line with the change of use to a student-led scheme with residential and commercial space. However, the quantum of trips will not materially change from that which has been assessed within the extant permission.

5. In addition, an assessment of the impact of the development on the transport network (including public transport, and walking/cycling networks) will be completed as part of a Healthy Streets Transport Assessment (TA). This TA will be submitted with the planning application along with a Travel Plan which will aim to promote sustainable travel to/from the site.

APPENDIX 12
Wind Microclimate

DATE / REF

04/02/2022
JW/1790

ADDRESS

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Battersea Park Road, Nine Elms

Wind Microclimate Scoping

Baseline Conditions and Sensitive Receptors:

- The dominant wind direction for the site is from the south west, with winds strongest in winter and calmest in summer.
- Baseline wind conditions are expected to be suitable for a mixture of sitting, standing and walking, as is typical for a built-up location in the greater London area.
- Potential receptors are; local thoroughfares, bus stops on Battersea Park Road, building entrances and the proposed amenity spaces around the site.

Potential Effects

- The southern end of the site is sheltered by the neighbouring development, so is not expected to cause any wind effects on the site or surrounding area.
- The northern end is more exposed, and the massing of the site may result in raised wind speeds at the northern end of the site, and around the junction between Battersea Park Road and Sleaford Road.
- Initial Computational Fluid Dynamics (CFD) testing suggests that the wind speeds will not be sufficiently raised to create any regions which are unsuitable for the intended pedestrian activity.
- During construction, wind conditions will move gradually from the baseline conditions to those of the completed and operational development. As the operation effects are not expected to be severe, therefore neither are construction effects.

Mitigation

- Should wind mitigation be required, it is expected that it will be possible to achieve desirable conditions through modifications to the proposed landscape strategy.

Significance of Effects

- No significant residual wind effects are likely.

Technical Work

- A full wind microclimate study is proposed, using results of further CFD testing and the Lawson Comfort Criteria to compare wind comfort and safety conditions for the following scenarios:
- Existing Site with Existing Surrounds;
- Proposed Development with Existing Surrounds; and
- Proposed Development with Cumulative Surrounds.