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17.11.2017  
DC/17/101619

Dear Mrs Fernandez,

**Request for Scoping Opinion submitted under Regulations 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations (As Amended) 2011 in respect of a proposed flood alleviation scheme within the catchment of the River Ravensbourne, comprising of: works to raise low points in existing river walls between Ladywell and Lewisham town centre; the formation of a floodwater storage area within Ladywell Green (land bounded by Slagrove Place, SE13); the realignment of the River Ravensbourne and formation of a flood storage area at Beckenham Place Park, BR3, together with associated structures and landscaping works.**

I write in response to your scoping request for the above site submitted on the 15 May 2017.

### **Introduction**

A Scoping Request ("SR") and accompanying report ("scoping report") in relation to a proposed flood alleviation scheme qualifying as development where an Environmental Impact Assessment is required has been received by Lewisham Borough Council as the relevant local authority. This report constitutes the Scoping Opinion of the relevant local authority which is required to be adopted upon the receipt of an SR pursuant to Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 ("the EIA Regulations").

### **Site Description**

The area to which the scoping opinion request relates is extensive, covering a substantial part of the borough. It covers the lower reaches of the River Pool as far as the A2218 (Southend Lane), the Honour Oak Stream and Ravensbourne River from Beckenham Place Park to the tidal limit in Deptford.

The Ravensbourne River, which forms the focus of the proposed works, flows from Keston in the south, northwards into Deptford Creek, where it flows into the River Thames upstream of Greenwich. The lower two thirds of the catchment is heavily urbanised. The Ravensbourne catchments incorporates several tributaries: including the Honor Oak, Spring Brook, Pool River, The Beck, Chaffinch Brook, Chaffinch Brook (west branch), St James Stream, Ravensbourne East Branch, Ravensbourne South Branch and the River Quaggy.

The town centres of Catford, Lewisham and Deptford have all developed alongside the banks of the river. As a result, the river has been heavily modified through the creation of concrete channels, narrowing, loss of natural floodplain (i.e. through local defences and development in the floodplain) and the introduction of weirs and other drop structures.

The Honor Oak Stream (sometimes referred to as the Chudleigh Ditch) is a surface water drainage channel that outfalls to the Ravensbourne via two concrete culverts. One outfalls to Ladywell Fields and the other near Molesworth Street, hereafter referred to as the northern and southern Honor Oak culverts respectively. The open channel is approximately 1.5m wide and 0.7m deep.

Over the proposal area, the works would take place within 13 distinct sites. The sites and their designations are as follows:

1. Brookmill Park
  - Waterlink Way (Lewisham Local Plan Policies Map 2015)
  - Metropolitan Open Land (MOL) (London Plan classification, incorporated into Lewisham Local Plan Policies Map 2015)
  - Urban Green Space (Lewisham Local Plan Policies Map 2015)
  - Public Open Space (Lewisham Local Plan Policies Map 2015)
  - Sites of Importance for Nature Conservation (SINC) (Lewisham Local Plan Policies Map 2015)
  - Archaeological Priority Area (Historic England, incorporated into Lewisham Local Plan Policies Map 2015)
  - Flood Zone 2/3 (Environment Agency Flood Map classification)
  - Brookmill Road Conservation Area (Lewisham Local Plan Policies Map 2015)
  - Green Corridor (Lewisham Local Plan Policies Map 2015)
2. Armoury Road
  - Waterlink Way
  - Green Corridor
  - SINC
  - Flood Zone 2/3
  - Major District Centre
  - Archaeological Priority Area
3. Cornmill Gardens
  - Waterlink Way
  - MOL
  - Lewisham Gateway Roundabout Road Improvement (PPP development in Lewisham Town Centre)
  - SINC
  - Archaeological Priority
  - Green Corridor
  - Flood Zone 2/3
  - Major District Centre (London Plan classification)
  - Lewisham Town Centre (LTC, subject to the specific Lewisham Town Centre Local Plan)
4. Silver Road
  - Archaeology
  - SINC
  - Major District Centre
  - MOL
  - Flood Zone 2/3
5. Molesworth Street

- SINC
  - Local Employment Location (LEL, classification within Lewisham Local Development Framework)
  - Archaeology
  - MOL
  - LTC
  - Waterlink Way
  - Flood Zone 2/3
  - Major District Centre
6. Curness Street
- Waterlink Way
  - Archaeology
  - SINC
  - Major District Centre
  - Flood Zone 2/3
  - Archaeology
  - St Mary's Conservation Area
7. St Mary's Church
- Archaeology
  - SINC
  - Public Open Space
  - LTC
  - Waterlink Way
  - MOL
  - St Mary's Conservation Area
  - Adjacent to two listed buildings (Ladywell Baths & St Marys)
8. University Hospital
- Archaeology
  - Waterlink Way
  - MOL
  - SINC
  - Green Corridor
  - Flood Zone 2/3
9. Albacore Crescent
- SINC
  - MOL
  - Green Chain
  - Public Open Space
  - Archaeology
  - Waterlink Way
10. Malyons Road
- SINC
  - MOL
  - Green Chain
  - Public Open Space
  - Archaeology
  - Waterlink Way
  - Green Corridor
  - Flood Zone 2/3
11. Honor Oak/Ladywell Green
- Ladywell Water Tower listed building

- Green Chain
- Public Open Space
- Flood Zone 2/3
- SINC
- MOL
- Green Corridor

#### 12. Beckenham Place Park

- MOL
- Public Open Space
- SINC
- Archaeology
- Green Chain
- Urban Green Space
- Ancient Woodland
- Green Corridor
- Flood Zone 2/3

#### 13. Ladywell Fields

- Ladywell Conservation Area
- Ladywell Train Station listed building
- MOL
- SINC
- Green Corridor
- Waterlink Way
- Public Open Space
- Flood Zone 3

The proposal also includes 'low-flow' works within the course of the Ravensbourne River.

### **Site History**

Many of the sites relate to open spaces along the river corridor for which there is limited planning history. There are however three sites of proposed works for which the planning and development history is relevant to this scoping opinion. Information submitted with recent development applications at these sites may be useful in completing the eventual Environmental Statement ("the ES").

#### **3. Cornmill Gardens**

DC/09/71246 – Redevelopment of adjacent site to the north with multiple buildings ranging from five to twenty four storeys in height comprising a leisure centre, business and retail space and residential dwellings. The development is now complete and is marketed as Renaissance SE13.

DC/06/62375 – The granting of planning permission to the large-scale Lewisham Gateway proposal in May 2009 in close proximity to this site is relevant. This proposal involves works to naturalise the Ravensbourne River near Cornmill Gardens. It therefore highlights the importance of the Ravensbourne River in this location, which is very proximate to the town centre of Lewisham, which is classified as a Major Town Centre under the London Plan.

#### **10. Malyons Road**

DC/09/072819- Landscape and river work improvements to the Middle and Southern Fields, Ladywell Fields SE13, including the provision of two bridges, timber board walks, new footways, play equipment, street lighting and furniture. Within the area to which the scoping

opinion relates, permission was granted to break out a concrete section of culverted parts and soften/regrade the edges of the channel.

## 12. Beckenham Place Park

DC/16/097594 - The construction of a community BMX cycling facility comprising a limestone grit track, landscaped grass mounds and a temporary metal storage unit at Beckenham Place Park, BR1. Approved May 2017.

DC/16/099042 - Regeneration of part (west of rail line) of Beckenham Place Park, Beckenham Hill Road (ref: DC/16/099042). Approved October 2017. Related to DC/16/099042, an application for Listed Building Consent for the proposed rebuilding and conversion of the stable block at Beckenham Place Park, to provide a cafe and education centre, together with alterations to and refurbishment of Southend Lodge and the Gatehouse (re: DC/16/099043). This application has a resolution to grant but is subject to Secretary of State approval.

## EIA Proposals

The SR relates to proposals for a flood alleviation scheme proposed to be installed by the Environment Agency throughout the borough of Lewisham, comprising of a flood storage area at Beckenham Place Park in combination with local flood defences elsewhere in the Borough and works to Honor Oak Stream in Ladywell. The works involve:

### Beckenham Place Park (east of railway line)

- Formation of an earth embankment varying in height between 0.5m to 3.5m around the western, northern and eastern edges of the park to store floodwater temporarily (approximately one day during a flood event). Fill for embankment will be sourced from within the park and some imported material. It is proposed to be landscaped to minimise visual impact. In some locations, sheetpile walls are proposed to be used.
- Three spillways (low points) are proposed on the embankment to channel flows in time of extreme flood event when storage is exceeded.
- Control structure and coarse debris screen. The control structure would comprise a twin culvert of 15m length through the embankment. The coarse debris screen would comprise vertical tree trunks to prevent large debris blocking the structure.
- River realignment and restoration: the Ravensbourne River would be realigned in two locations. At the southern end of the park (for a length of 400m) the realignment would bring the river out of a straightened concrete channel, mimicking the historic river alignment and restoring natural river processes. The realignment in the north eastern end of the park (for a length of approx. 300m) results from the position of the embankment and would realign the river through the centre of this part of the park.
- Landscape improvements including: signage, footpath improvements, Green Chain route diverted along embankment.
- Biodiversity: removal of mature trees, replanting of 10% extra trees, deposition of silt/alluvium on floodplain (encouraging wetland flora), realigned river designed to support macrophytes (aquatic plants) and fish, creation of wetland priority habitats and enhanced fish passage.

### Local defences between Ladywell and Lewisham

Low points in the river defences downstream between Ladywell and Lewisham would be raised by 0.3 to 0.7m (revised information provided after the submission of the scoping report indicates that defences may be installed to a height of 1.2m) to enable more water to be held in the channel, preventing flooding. These works would take place in:

- Brookmill Park (Ravensbourne Place)
- Armoury Road
- Cornmill Gardens
- Silver Road

- Molesworth Street
- Curness Street
- St Mary's Centre
- Lewisham Hospital
- Albacore Crescent
- Ladywell Fields
- Malyons Road

#### Honor Oak Stream and Ladywell Green

To reduce the risk of localised flooding from the Honor Oak Stream, it is proposed to provide floodwater storage in Ladywell Green.

- Excavation of Ladywell Green by approximately 1.5m to provide space to store water, and area re-landscaped. Material to be disposed of offsite or re-used in Beckenham Place Park.
- Existing channel to be cleared, silt removed from existing culverts and new trash screens installed

#### Documents submitted

Lewisham and Catford Flood Alleviation Scheme Environmental Scoping Report (Ref: R00034, Version 2) ("the scoping report").

The report identifies that an Environmental Impact Assessment is required, and that the scope of the assessment should comprise the following topics:

Traffic and Transport  
 Flora and Fauna  
 Historic Environment  
 Soils and Land Quality  
 Geology and Hydrogeology  
 Hydrology and Geomorphology  
 Landscape and Visual Amenity  
 Socio-Economics  
 Air Quality  
 Noise and Vibration

#### Consultations

Consultation with following consultation bodies in respect of this scoping request has been carried out in accordance with Regulation 13(4) of the EIA Regulation. The comments of the consultation bodies are provided below:

##### **Historic England (Archaeology)**

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter. The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should be required to submit appropriate desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision.

The planning application crosses three areas of archaeological interest (Archaeological Priority Areas) identified for the Local Plan. These are:

- Beckenham Place Park;
- Deptford - The Broadway and Tanners Hill;
- Lewisham and Catford / Rushey Green.

Our office recommend that archaeology be scoped into the Environmental Impact Assessment to enable judgment to be made as to whether there is an on-going archaeological interest and if so whether it can be secured by appropriate condition/s.

### **Thames Water**

No comments to make at this time.

### **Transport for London**

TfL has prepared its own Transport Assessment (TA) best practice guidance. As well as assisting developers in preparing transport assessments this guidance would also be of use in scoping the EIA and in its subsequent preparation. Details can be found here: <http://www.tfl.gov.uk/infofor/urban-planning-and-construction/transport-assessment-guidance>.

The EIA will need to assess the worst case peak hour impact and include any peaks and troughs throughout the life of site clearance and construction works. The impact of construction and related vehicles on buses, pedestrians and cyclists must also be considered. An outline Construction Logistics Plan (CLP) will be required to supplement the EIA and the TA, with the full CLP secured by way of any subsequent planning permission. As well as the impacts of vehicles associated with site clearance and construction, site and any adjoining land to be used during the works management arrangements should also be considered in terms of their impacts, inter alia, on pedestrians, cyclists, public transport and general traffic.

Similarly the EIA should also consider servicing and delivery impacts of the development and put forward mitigation including for example through a DSP, use of sustainable modes, consolidation and timing

Any site specific mitigation measures relating to TfL infrastructure and services must be secured through the s106 agreement. Planning conditions may be requested if appropriate and TfL may request that it is consulted prior to discharge of a condition. The EIA should identify these on a heads of terms basis where put forward as mitigation of impacts.

### **Natural England**

No comments received.

### **Sport England**

Sport England considers that the impact of a development on sports facilities or activities would not normally fall within the scope of an ES. Consequently we do not wish to comment on the Screening or Scoping Opinion consultation.

Any subsequent planning application should however consider the implications for sport in the context of NPPF Para's 73 and 74, local plan policy and any strategic evidence set out in local playing pitch and/or built facilities strategies within the normal supporting documentation for a planning application.

Sport England should be consulted on the planning application if it meets the statutory requirements contained within SI 2015/295 (development affecting playing fields) or the guidance for non-statutory consultation with Sport England contained within Planning Practice Guidance: Open Space, Sports and Recreation Facilities (Paragraph: 003).

### **LB Bromley**

The scoping report refers to the main vehicular access to the park being from Old Bromley Road off the A21 within Lewisham. There is also potential for vehicular access from Ravensbourne Avenue within Bromley but the northern section of this road is unmade and unsuitable for regular use by HGVs. This would also entail use of the remainder of Ravensbourne Avenue which is entirely residential in nature and is thus undesirable.

A Transport Assessment (TA) is required and this is noted in the scoping report. This will, amongst other things, indicate the potential routes to be taken by construction traffic and the numbers involved.

A part of the overall proposal seems to be to attract more visitors to this part of the Park and includes the improvement of the access from Ravensbourne Avenue. This has potential to attract more parking near to this access especially as the unmade section of Ravensbourne Avenue is not subject to waiting restrictions. The impacts of this need to be considered in the TA as no parking appears to be being proposed within the park at this point. Further comment will be offered once the TA is available.

### **Environment Agency**

No comments have been received at this time. It is acknowledged that the consultation period with this consultation body has been relatively brief. Any comments received from this consultation body will be provided to the applicant as soon as possible following the receipt of any comments, as will any further relevant comments.

### **Environmental Sustainability**

No comments received.

### **LBL Highways (including Highways Drainage)**

No comments to make at this time in relation to the Scoping Report, but further comments in relation to each site will be passed to the applicant as they arise.

### **LBL Environmental Health – Land Contamination**

Whilst in principle I would accept the recommendations for further work in the scoping report, I consider it would also be prudent that initial UXO assessments are undertaken at the proposed site locations.

### **LBL Ecology Regeneration Manager, Tree Officer and Parks Manager**

No comments to make at this time.

### **LBL Conservation Officer**

No comments to make at this time.

### **Considerations**



The relevant regulations are Directive 2011/92/EU of the European Parliament and the Town & Country Planning (Environmental Impact Assessment) Regulations 2011 (the EIA Regulations). Guidance on procedures under the EIA Regulations is set out within the National Planning Practice Guidance (NPPG).

The NPPG Guidance for EIA includes the following in relation to scoping: "Local planning authorities and developers should carefully consider if a project should be subject to an Environmental Impact Assessment. If required, they should limit the scope of assessment to those aspects of the environment that are likely to be significantly affected."

The provisions of the London Plan (2016), Core Strategy (2011) and the Development Management Local Plan (2014) Policies will clearly be material to the eventual determination of any planning application for the flood alleviation proposals but such documents are not directly relevant to the decision on the scope of Environmental Impact Assessment.

In preparing the scoping response the Council has had regard to:-

- EIA scoping report (prepared by the potential applicant in this case, the Environment Agency)
- Responses received from consultees
- The provisions of all relevant legislation and applicable statutory planning instruments

Any responses from consultees received after this scoping letter will be forwarded to the applicant, and addressed through the preparation of the ES.

### **Screening**

The applicant states, at Section 5.1 of the scoping report, that it is anticipated that the works will require a statutory EIA under Schedule 2 10(h) of the EIA Regulations. The proposed development is of a scale which exceeds the applicable thresholds included in Schedule 2 of the EIA Regulations. No screening of the proposals are therefore necessary; Environmental Impact Assessment is required.

### **Scoping – Compliance with Regulations**

The Scoping Request (SR) has met the regulatory requirements set out in Section 13(2) of the EIA Regulations which state that a scoping request must include *"a plan sufficient to identify the land; a brief description of the nature and purpose of the development and of its possible effects on the environment; and such other information or representations as the person making the request may wish to provide or make"*.

The SR sets out the proposed contents of the ES in accordance with Schedule 4 of the EIA Regulations which sets out "Information for inclusion in the Environmental Statement" and this is considered satisfactory save for particular detail or commentary within each chapter.

With regard to the consideration of the types of likely significant effects the SR provides a description of the key characteristics of the existing environment for a range of receptors and the likely significant effects on them arising from the proposed development.

### **Significance Criteria**

Section 5.2 of the scoping report outlines the general approach to determining the significance of impacts on environmental receptors and resources. The general approach outlined is appropriate and supported; however the ES will need clearly set out the precise approach and criteria used for the assessment of significance relative to each topic of environmental effects. The relevant factors for determining significance will vary depending on the type of effect and component of the receiving environment being considered. It must be clear for each of the

topics how the assessment has been undertaken, how decisions on significance have been determined and what has been considered to be a significant effect in EIA terms. The topic assessment conclusions must be transparent, with assessment conclusions clearly justified and grounded in professionally-recognised guidance, or professional judgement, where guidance does not exist.

Each assessment must clearly set out the effects in relation to the construction and operation phases in order to avoid confusion between the phases.

### **Cumulative Assessment**

#### *Lewisham Town Centre*

Schemes in Lewisham Town Centre must also be added into a cumulative assessment. Planning permission has been granted for a regeneration project called the Lewisham Gateway project (DC/06/62375) by the Council in May 2009, and the first phase of this scheme is currently being delivered. Consultation with this property owner as to construction programme conflict should be carried out and incorporated into the ES where relevant to cumulative effects.

Work is already ongoing as authorised by numerous planning permissions at 68 Molesworth Street (Riverdale House), which is being converted to apartments. This building is directly adjacent to the proposed Molesworth Street works site. Consultation with this developer as to construction programme conflict should be carried out and incorporated into the ES where relevant to cumulative effects.

An application for the redevelopment of Axion House, Silver Road (DC/17/102703) is currently submitted and under consideration by the Council. This application includes the Silver Road site of proposed works within the scoping report. Consultation with this developer (if the planning permission is granted) as to construction programme and structure location conflicts should be carried out and incorporated into the ES where relevant to cumulative effects.

An application for the redevelopment of the former Tesco Superstore site at 209 Conington Road (DC/17/101621) is currently submitted and under consideration by the Council. This application is proposed to result in works directly opposite the Armoury Road works site. Consultation with this developer (if the planning permission is granted) as to construction programme and structure location conflicts should be carried out and incorporated into the ES where relevant to cumulative effects.

#### *Ladywell/ Honor Oak*

Planning permission has been granted in August 2017 for an expansion of the nursery at the Ladywell Lodge Training and Conference Centre, Slagrove Place, which is very close to the north of the Ladywell Green/Honor Oak works site (DC/17/102591). Consultation with this property owner as to construction programme conflict should be carried out and incorporated into the ES where relevant to cumulative effects.

#### *Beckenham Place Park*

Planning permission has been granted in October 2017 for development in the west of Beckenham Place Park (west of the railway line, Case No. DC/16/099042). The approved works relate to proposed regeneration within the park, comprising substantial landscaping changes including the restoration of an historical lake, the construction of a café and educational facilities, and new storage facilities for park maintenance purposes. Regard will need to be had to cumulative environmental effects which may result due to the implementation of this project as well as the project which is the subject of this scoping opinion. The construction programme will need to be considered with respect to temporary adverse effects

during construction and their timing with respect to the same necessary construction works within the western side of the park. Permanent environmental effects upon the receiving environment as affected by this planning permission will need to be assessed in the ES.

There does not appear to be any planning permission applications received for development of the large empty site to the south-west of Millwall Football Club training fields, immediately to the east of Ravensbourne River within the southern extent of Beckenham Place Park.

Schemes close to the boundary with the London Borough of Bromley should be added in for cumulative assessment.

### **General Points**

The SR provides some detail on the receptors identified as likely to be significantly affected and the study area for each assessment. Plans showing the assessment study area and location of receptors should be included for every relevant topic with accompanying justification in the text.

In accordance with the EIA Regulations, the ES should include an indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

In accordance with the EIA Regulations, a Non-Technical Summary of the information provided in the ES needs to be prepared.

### **Topics agreed to be scoped in to the EIA**

- Traffic and Transport
- Flora and Fauna
- Historic Environment
- Soils and Land Quality
- Geology and Hydrogeology
- Hydrology and Geomorphology
- Landscape and Visual Amenity
- Socio-Economics
- Air Quality
- Noise and Vibration

### **Additional topics to be scoped into the EIA**

- Residential Amenity and Character
- Recreational Amenity

### **Topic agreed to be scoped out of the EIA**

- Medium and long range views of local defences between Ladywell and Lewisham, and at Honor Oak/Ladywell Green (as a component of landscape and visual amenity effects)

Further comments on the individual topics with respect to scope and level of details to be provided and relevant matters to be assessed within the ES are provided below.

### **Traffic and Transport Effects:**

The scoping in of this topic into the EIA is appropriate. Officers agree with the clear theme of the discussion of this topic in the scoping report that the likely effects which have the most potential to adversely affect the environment to be those generated during the construction process occurring at each site. However, the permanent/operational traffic effects (maintenance requirements, likely changes in visitor numbers) will also need to be addressed

in the ES, with mitigation strategies/design features to mitigate the effects identified and included in the final design to be the subject of the ES.

The considerations and potential effects outlined in section 4.2 of the scoping report are logical, in particular the five bullet points relating to different traffic and transport effect types on pages 32 and 33 of the scoping report. Guidance from 1993 however may be out of date with current best practice traffic and transport assessment methods. LB Lewisham's Highways Engineers have been consulted and have no additional comments to make concerning the scoping report discussion of this topic, but any traffic and highways comments will be passed to the applicant as they arise.

Specific consideration of the unique access constraints of each individual site of proposed work will be necessary to ensure traffic effects (in particular safety and congestion) are suitably mitigated. Site visits carried out by officers to date reveal that access to some sites are narrow or will affect high public-use spaces (footpaths, parks etc.).

Agree that at minimum a Construction Logistics Management Plan, potentially incorporating a Deliveries and Servicing Management Plan, comprehensive to cover all proposed works at all sites will be a necessary part of the ES, with measures to mitigate any adverse traffic and transport effects as much as practicably possible. This would include, inter alia, mitigating effects associated with site set up, fencing and gantry construction, plant drop off and set up, labour transport, any site parking, material deliveries and servicing throughout the life of each project, heavy vehicle access to and from the site. Use of sustainable transport modes for labour transport to and from the site and consolidation/timing of construction-related transport movements will need to be covered in the ES.

It is noted that the summary of issues and recommendations for further work (page 33-34 of the scoping report) refers to contractor input with respect to traffic movement calculations, likely construction programme timeframe, and labour requirements. If a contractor is not appointed for the works at the time of completing the ES, expert traffic engineer input will need to be sought to prepare reliable estimates of this information in order to accurately assess the traffic and transport effects of the proposal.

Consultation with LBL Planning (and Highways), LB Bromley Highways and TfL should continue as the scheme develops, leading up to a planning application.

#### *Cumulative Assessment*

The following proposed developments should be included within a cumulative transport impact assessment, which should consider all modes and construction traffic:

- Carpetright site, Lewisham TC (planning application ref DC/17/102049)
- Tesco, Lewisham TC (planning application ref DC/17/101621)
- Lewisham Retail Park (DC/16/097629)
- Lewisham Gateway (DC/06/62375)
- Axion House, Silver Road (DC/17/102703)
- Beckenham Place Park regeneration (west of railway line, planning application ref DC/16/099042)
- Dylon Works, Lower Sydenham (LB Bromley)

#### **Flora and Fauna Effects:**

The scoping in of this topic into the EIA is appropriate. The considerations and potential effects outlined in section 4.3 of the scoping report are logical, and the further work identified on pages 43 and 44 is supported, although one key additional effect needs to be covered – erosion and sediment control during construction. LB Lewisham's Ecology Regeneration Manager has

been consulted and has no additional comments to make concerning the scoping report discussion of this topic.

An Erosion and Sediment Control Plan covering the breadth of the project should be incorporated into the ES, demonstrating how sites of land disturbance will be managed so as to avoid or mitigate as much as possible the potential for dust to affect the surrounding environment, as well as silt/sediment runoff entering the stream and adversely affecting stream/riparian margin ecosystems. This would incorporate actions, where appropriate, such as cleanwater diversions, silt fences, drainage grill protection, covering of temporary stockpiles, utilising weather forecasts to optimise work progress in periods of fine weather, stabilised entries to work sites to remove soil from truck wheels, amongst other potential mitigation measures.

Generally the ecological considerations identified and actioned to date are broad, which is appropriate and positive. It is noted that with respect to birds/avifauna, breeding/nesting birds appear to be the focus of consideration. Potential effects upon migratory birds who may migrate to the park spaces to be affected by the proposed works will need to be considered also.

The level of detail to be provided concerning this topic in the ES will need to be proportionate to the ecological status of the spaces being affected. Where the proposed works will affect spaces which are relatively ecologically rich and diverse, further scrutiny of the effects upon the flora and fauna of the habitat to be affected will be necessary; where the site has already been heavily modified or the proposed works have minimal intrusion into existing ecosystems, it is accepted that there may be very little effects generated and consequently a more brief assessment may be provided.

#### **Historic Environment/Heritage Effects:**

The scoping in of this topic into the EIA is appropriate. The considerations and potential effects outlined in section 4.4 of the scoping report are logical, and the further work identified on pages 47-49 appropriate. LB Lewisham's Conservation Officers have been consulted and have no additional comments to make concerning the scoping report discussion of this topic at this time. Historic England have also been consulted and have pressed that archaeology needs to be included within the scope of heritage effects/effects upon the historic environment. Officers consider this appropriate given the degree of land disturbance and depth of proposed excavation in certain places, combined with the majority of the Ravensbourne River being located within an Archaeological Priority Area as defined by Historic England.

With regard to Beckenham Place Park, consideration must be given to the setting of the park as a whole including the impact upon the Mansion House. It is therefore expected that the most attention of the ES with respect to this location will concern any potential adverse archaeological effects, and effects on the relationship of the park spaces where pedestrian/play/sitting uses are promoted to nearby listed heritage assets (in the west of Beckenham Place Park). All matters discussed on pages 44-45 of the scoping report however should be addressed in the ES.

It is noted in the scoping report that one of the sites of the proposed works falls within the St Mary's Conservation Area. This is correct – the structures/mounds at the St Mary's Centre site are directly adjacent to the graveyard area of Lewisham Parish Church of St Mary the Virgin, and church buildings further to the east. The works at Brookmill Park also appear to fall within a conservation area (Brookmill Road Conservation Area). Structures proposed at Ladywell Fields are in close proximity to the Ladywell train station, which is a grade-II listed building and within the Ladywell Conservation Area. Heightened scrutiny of heritage effects within these areas, in particular the effects upon the settings surrounding these buildings, is therefore expected in the ES.

### **Soils and Land Quality Effects:**

The scoping in of this topic is appropriate. The considerations and potential effects outlined in section 4.5 of the scoping report are logical, however it is noted that the scoping discussion seems to focus on contamination and not land stability, which would fall within scope of land quality. It is also not agreed that this topic should be scoped out completely with respect to the proposed local flood defences between Lewisham and Ladywell (as suggested within section 4.5.2 of the scoping report).

The scoping report has been reviewed by LB Lewisham's Environmental Protection Officer. The material result of this consultation is that, in addition to the recommended work moving forward, it is also recommended that UXO surveys are carried out and the risk assessed within the ES. This is adopted by officers considering the relatively large area of land to be affected by proposed works and the spatial separation of the land north-south throughout the length of the borough. UXO survey and assessment of potential safety effects during construction should therefore be added as a sub-topic of land quality.

The further work actions identified on pages 53-54 in relation to the potential for land contamination are therefore considered appropriate. It is further recommended that site-specific Site Contamination Management Plans be prepared for those sites where elevated concentration levels have been found/are known to exist or suspected to exist based on the analysis of a suitably qualified contamination specialist. This is based on the wide profile of potential contaminant sources (either within the sites or nearby) across the project. Further testing will need to be completed to confirm the appropriate contamination management techniques. These plans do not have to be exhaustive; rather direct and illustrative on one or two pages showing where controls will be (bunds, fences, drainage grill covers etc.), where testing will be carried out, clean v contaminated soil stockpiled and covered, transport and disposal of contaminated soil, how ground water testing for contamination will be carried out when encountered during excavation, is preferred. The plans will need to cover both human and environmental receptors.

Effects upon land stability need to be incorporated into this topic and addressed within the ES. The reason for this is due to the potential for changes in land stability as a result of the proposed works, which in turn can affect the risk of instability (either during construction or post-construction) affecting other land outside of the subject sites. The importance of this assessment is exacerbated in this context by the proximity to the river and the potential for encountering a high groundwater table in parts. Suitable engineering expertise should be incorporated to address this moving forward. All proposed sites should be assessed with respect to the potential for land instability effects; as such, it is not agreed that this topic be scoped out of the ES for sites between Ladywell and Lewisham.

### **Geology and Hydrogeology Effects:**

The scoping in of this topic is appropriate, and there are no issues with the further work identified to be completed and incorporated into the ES (page 57 of the scoping report).

Further details are requested as to the general mechanics of how the Ladywell Green storage area will work – including any new culverts/underground pipes to be installed.

Otherwise this topic and level of details is appropriately identified in the scoping report. The further work actions specified on page 57 of the scoping report are supported, and are adopted as the scoping opinion of LB Lewisham in relation to information to be included in the ES concerning this topic.

### **Hydrology and Geomorphology Effects:**

The scoping in of this topic is appropriate, and the considerations and potential effects outlined in section 4.7 of the scoping report are logical. The only clear direction to be made on this relates to geomorphology – the effects of the proposed works upon the character of the natural environment of stream in its entirety insofar as it is subject to the proposed works needs to be assessed. The further work actions specified on page 64 of the scoping report are supported, and in addition to the above comment, are adopted as the scoping opinion of LB Lewisham in relation to information to be included in the ES concerning this topic.

#### **Landscape and Visual Amenity Effects:**

The scoping in of this topic is appropriate, and the considerations and potential effects outlined in section 4.8 of the scoping report are logical. The further work actions specified on page 69 of the scoping report, inclusive of the methodology for undertaking the landscape and visual amenity effects assessment, are supported.

The ES will need a particularly strong focus on the impacts upon the local landscape of Cornmill Gardens. Specifically from the west/north-west elevation and the changes to the eastern side of this park. It should be at the forefront of the assessment within the ES that this space is highly prominent, highly used (in close location to recent regeneration and Lewisham Town Centre, where further residential and commercial development is encouraged by the Lewisham Local Development Framework) park which is award winning for its design.

The ES will also need a particularly strong focus on the coherency and integration of the design with the approved works within the western side of Beckenham Place Park and the holistic change to occur within the park, and the consequential visual and (if applicable) landscape amenity effects (as a result of embankments within the park to be constructed).

Visual amenity effects need to also be considered from the perspective of nearby residents, as touched on in the scoping discussion.

It is noted that discussion of this topic on page 66 of the scoping report concludes that medium-long distance views to Beckenham Place Park have been scoped out. Until the precise design dimensions of new mounds and retaining walls at this site are known and effects can be accurately assessed, this is considered to be premature is therefore objectionable that this component of landscape and visual amenity effects are scoped out. Views should be confirmed with officers one further design development has progressed.

Officers agree that this assessment matter can be scoped out with respect to local defences between Ladywell and Lewisham, and at Honor Oak/Ladywell Green, due to the small scale of proposed structures/modifications within these sites and limited visual catchment to the proposed changes as a result.

#### **Socio-Economic Impacts:**

The scoping in of this topic is appropriate. The discussion of this topic in the scoping report overlaps with effects canvassed elsewhere – noise, vibration, traffic effects etc. It is appreciated that this is inevitable to a degree. The ES will need to address the macro-scale effects upon the population in relation to this topic. Assessment of changes in social interaction and fostering of social capital, human health effects/opportunities, education opportunities, economic benefits and losses (lightly touched considering small scale of majority of works), opportunity costs, disruption across the borough, designing out of crime, as a collective series of (likely) positive and negative effects upon the population of the borough could be included here. These are largely identified in the recommended further work actions (page 73 of the scoping report), which is positive. The project in its entirety, particularly with the inclusion of the Beckenham Park Place proposal, is considered to be large enough to have some demonstrable effects in relation to this topic.

Officers will seek to secure a commitment to Council's Local Labour scheme through a section 106 agreement.

#### **Air Quality Effects:**

The scoping in of this topic is appropriate, and the considerations and potential effects outlined in section 4.10 of the scoping report are logical. The further work actions specified on pages 75 and 76 of the scoping report are supported, and are adopted as the scoping opinion of LB Lewisham in relation to information to be included in the ES concerning this topic.

#### **Noise and Vibration Effects:**

The scoping in of this topic is appropriate, and the considerations and potential effects outlined in section 4.11 of the scoping report are logical. The further work actions specified on pages 78 and 79 of the scoping report are supported.

In addition to these actions, a Construction Noise Management Plan detailing best-practicable-option noise mitigation measures to be applied to the specific site contexts and construction requirements should be included as part of the ES concerning this topic.

#### **Residential Amenity and Character Effects:**

This topic should be scoped into the ES. This would cover matters such as:

1. Any privacy effects upon existing amenity levels at established residences, generated by changes in ground levels of recreational spaces in proximity to established residences;
2. Any bulk and dominance effects generated by the installation/construction of walls, ancillary structures and earth mounds/embankments upon existing amenity levels at established residences;
3. Any shading/overshadowing effects generated by the installation/construction of walls, ancillary structures and earth mounds/embankments upon existing amenity levels at established residences;
4. Any visual effects/effects upon outlook generated by the installation/construction of walls, ancillary structures and earth mounds/embankments upon existing amenity levels at established residences;

It is appreciated that that several of the proposals will have very minimal effects in relation to this topic; however the degree of effects will certainly vary from site to site.

Noise is also a residential amenity issue however this has been scoped in as a standalone issue. As such, it does not need to be repetitively covered with respect to residential amenity.

This assessment should also consider if any proposed buildings, structures or embankments are out of character with the character of the existing neighbourhood, if located in close proximity to an established neighbourhood or visible from residential streets/numerous rear terraces, windows or back yards. Again it is appreciated that in parts there may be very minimal effects.

#### **Recreational Amenity Effects:**

This topic should be included into the ES. This needs to cover any effects upon existing recreational users of the specific spaces to the affected by the proposal.

#### **Consideration of Alternatives**

The consideration of alternatives is included within Schedule 4, Part 2 (4) of the EIA Regulations and as such its inclusion in the SR is welcome. It is noted that consideration of



alternatives has occurred and is detailed in the scoping report (section 3). Any revisions or updated considerations to these alternatives moving forward should be detailed in the eventual ES.

## **Conclusion**

The Lewisham and Catford Flood Alleviation Scheme Environmental Scoping Report (Ref: R00034, Version 2) meets the requirements of regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The content of this report contains the Scoping Opinion of Lewisham Borough Council in relation to this Scoping Request.

In summary, all scoped topics within the scoping report are agreed to be scoped in to the ES to be prepared to accompany the eventual application for planning permission for the flood alleviation scheme. It is the opinion of LB Lewisham that the scope of most topics should be slightly wider or otherwise address other particular matters, specifically:

1. Ecology and general construction-effects management – the preparation of an Erosion and Sediment Control Plan to be in place for the duration of all works;
2. Ecology – to include assessment of any effects upon migratory birds;
3. Land stability – to include engineering assessment of land stability during and post-completion of the proposed works;
4. Land contamination – to include site-specific Site Contamination Management Plans incorporating the results of on-site testing where appropriate;
5. Land safety – to include surveys to determine the presence of UXO devices; and
6. Noise and Vibration – to include a Construction Noise Management Plan to be in place for the duration of all works; and the preparation of specific mitigation plans in relation to certain topics.

Further comments as to the exact scope and details relative to each topic to be scoped into the Environmental Statement, being the written Environmental Impact Assessment, are provided under the headings of each topic above.

Two other topics, residential amenity and character and recreational amenity, are recommended to be scoped into the ES to be prepared.

The scoping report identified that four assessment matters within the topics of soil and land quality and landscape and visual effects be scoped out of the EIA. Two of these are agreed (medium and long distance views of local defences between Ladywell and Lewisham, and at Honor Oak/Ladywell Green), whilst two are not (components of soil and land quality assessment, and medium-long range views towards Beckenham Place Park).

The Council has adopted the content of this report as a formal Scoping Opinion under Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

A copy of the opinion on Part 1 of the Planning Register as required by the EIA Regulations.

Yours Sincerely



Michael Forrester

Major and Strategic Projects Manager – Development Management