

## **TECHNICAL APPENDICES – ECOLOGY & NATURE CONSERVATION**

### **Appendices**

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**Appendix 17.1 Information downloaded from Natural England's Nature on the Map and Multi-Agency Geographic Information for the Countryside databases**



# Nature on the Map

## My Map



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|---|---|
| ★ <b>Natural England Offices</b>                        | □ <b>Sites of Special Scientific Interest</b> |
| ▨ <b>SSSI Live Management Agreements</b>                | ▨ <b>Natural England Regions</b>              |
| ▨ <b>SSSI Unit condition - last updated 25 Nov 2010</b> | ▨ <b>Natural England Area Teams</b>           |
| ■ <b>Favourable Condition</b>                           | ▨ <b>Scotland, Wales and Ireland</b>          |
| ■ <b>Unfavourable Recovering</b>                        | ▨ <b>Ordnance Survey background mapping</b>   |
| ■ <b>Unfavourable no change</b>                         | □ <b>England</b>                              |
| ■ <b>Unfavourable Declining</b>                         |   |
| ■ <b>Part Destroyed</b>                                 |   |
| ■ <b>Destroyed</b>                                      |   |
| ■ <b>Not Assessed</b>                                   |   |

## Appendix 17.2 Species Survey Methodology

### Badgers

- 1 During the course of the surveys undertaken during July and September 2009, attention was paid to the potential presence of Badgers, although access restrictions prevented full surveys of the Site. A specific Badger survey of the whole Site was undertaken during October 2010.
- 2 The surveys comprised two main elements. Firstly, searching thoroughly for evidence of Badger setts. For any setts that were encountered each sett entrance was noted and plotted even if the entrance appeared disused. Where present the following information was recorded:
  - i) The number and location of well used or very active entrances; these are clear from any debris or vegetation and are obviously in regular use and may, or may not, have been excavated recently.
  - ii) The number and location of inactive entrances; these are not in regular use and have debris such as leaves and twigs in the entrance or have plants growing in or around the edge of the entrance.
  - iii) The number of disused entrances; these have not been in use for some time, are partly or completely blocked and cannot be used without considerable clearance. If the entrance has been disused for some time all that may be visible is a depression in the ground where the hole used to be and the remains of the spoil heap.
- 3 Secondly, Badger activity such as well-worn paths, run-throughs, snagged hair, footprints, latrines and foraging signs were searched for so as to build up a picture of the potential use of the site and study area by Badgers.

### Bats

- 4 The buildings and trees within the Site were assessed for their potential to support roosting bats during July and September 2009 however access limitations prevented a full and detailed survey of all buildings at this stage. Full external surveys of all buildings and trees were undertaken during October 2010, with general suitability for bats and any obvious access points recorded. Binoculars and ladders were used where necessary.
- 5 The probability of a building being used by bats as a summer roost site increases if it:
  - is largely undisturbed.

- dates from pre 20c,
  - has a large roof void with unobstructed flying spaces,
  - has access points for bats (though not too draughty),
  - has wooden cladding or hanging tiles,
  - is in a rural setting and close to woodland or water.
- 6 Conversely, the probability decreases if a building is of a modern or pre-fabricated design / construction, is in an urban setting, has small or cluttered roof voids, has few gaps at the eaves or is a heavily disturbed premises.
- 7 The main requirements for a winter / hibernation roost site is that it maintains a stable (cool) temperature and humidity. Sites commonly utilised by bats as winter roosts include cavities / holes in trees, underground sites and parts of buildings. Whilst different species may show a preference for one of these types of roost site, none are solely dependent on a single type.
- 8 For a tree to be identified as having potential to support roosting bats it needs to exhibit one or more of the following characteristics:
- Frost cracks;
  - Trunk and branch splits;
  - Woodpecker holes;
  - Rot holes where branches have been removed;
  - Hollow sections of trunk, branches and roots;
  - Beneath loose bark;
  - Cavities beneath old root buttresses and coppice stools and
  - Behind dense Ivy.
- 9 Specific bat activity surveys were undertaken on two occasions during optimal weather conditions (still, relatively warm with no rain) in September 2009, from 15 minutes before dusk until 2 hours after dusk. Access restrictions prevented access to large parts of the Site, so efforts were concentrated on the perimeter of the Site in order to obtain data on bats transiting the Site as well as general bat activity in the immediate area. Three surveyors walked transects using "Batbox Duet" heterodyne bat detectors which were linked to Roland R-09 Edirol recorders for subsequent analysis using the BatSound computer program. Computer analysis of recorded ultrasound can assist in determining the identity of any bats that have been detected.
- 10 The external surveys undertaken in October 2010 were followed up with internal inspections to search for evidence of bat activity. Evidence of the presence of bats was searched for with particular attention paid to roof-beams and gable-ends. A detailed search was made for bat droppings on floors and surfaces within the building (droppings can indicate present or past use

by bats and extent of use). Other signs searched for included dead animals, staining on beams or around crevices and areas that were conspicuously cobweb-free.

- 11 The initial scoping surveys and further detailed intrusive surveys can be undertaken at any time of year since there is no requirement to record the animals themselves, it is the evidence of their presence which is searched for and this evidence can remain for many months, even years. The bat activity surveys were undertaken during September which is considered to be within the optimal season for undertaking such a survey.

**Appendix 17.3 Copy of Appendix 1 of London Borough of Lewisham’s Scoping Response**



# Lewisham

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14 July 2010  
Ref: 10/74106

Dear Ms. Carney,

**Town and Country Planning (Environmental Impact Assessment ( (England and Wales) Regulations 1999: Regulation 10(1)).  
Surrey Canal Triangle Development**

Thank you for your letter dated 16 April 2010, enclosing an Environmental Impact Assessment (EIA) Scoping Report for the above site (Reference: PC/LT/HG0588 dated 16 April 2008) and requesting a Scoping Opinion.

In preparing this Scoping Opinion, the Council has taken account of the specific characteristics of the proposed type of development, the specific characteristics of this particular development and the environmental features which are likely to be affected by the development in accordance with Regulation 10(6) of the Regulations.

The Council has consulted the statutory consultees (the Environment Agency, and Natural England) and also English Heritage and the London Borough of Southwark. I have also consulted colleagues in other Council services on the Scoping Report. All comments received have been taken into account in preparing this Opinion. As you are aware, the Council has also commissioned Capita Symonds to review the Scoping Report and this Opinion draws directly on their report. The case officer, Chris Brodie, has visited the site on a number of occasions and is familiar with it and the surrounding area.

On the basis that the EIA responds positively to the points raised in this letter and its appendix, I confirm that the Scoping Report provides an adequate basis for assessing the emerging proposals and preparing an Environmental Statement (ES).



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## **General Comments**

The Scoping Report is considered to contain the minimum information, required to meet the requirements of Regulation 10(2) of the EIA Regulations. The lack of detail of matters means that this Opinion is relatively long and detailed and should be seen as the basis for on-going discussion over the EIA process.

The intention to use a Development Specification and Parameter Plans to provide sufficient information to define the Proposed Development and to determine the likely significant effects and a Construction Management System or a Code of Construction Practice as a means for capturing the proposals to minimise the likely significant environment effects for demolition and construction works is welcomed. I look forward to discussing the detail of these documents and plans.

There is no information provided in the Scoping Report on the intended structure of the ES and the associated use of technical annexes and appendices. Although not a specific requirement of the EIA Scoping process, I would welcome the opportunity to discuss and agree this with you as you go forward with the project.

## **Overall Scope**

The topic areas identified for inclusion are considered appropriate, subject to the further detailed separate comments set out in Appendix 1. In terms of the coverage of the topic areas identified, the Council considers that landscape, townscape and visual assessment should including lighting; air quality should include odour; and the socio-economics and population should include community effects.

You specifically ask in Section 3.3 of the Scoping Report that a number of issues should be 'scoped out'. I address these in turn below.

Telecommunications. It is accepted that a specific chapter on telecommunication and electronic interference is not necessary. However, given the height of some scheme elements, the proximity of receptors and the identified intention in para 2.10 to make provision for 'new telecommunication and other information infrastructure' the separate study of the effects of the proposed development on telecommunications should be undertaken separate to the EIA. If no significant telecommunication and electronic interference is identified from this study, then this fact should simply be reported in the ES. However, if the study identifies that the proposed scheme is likely to have an effect on telecommunications which will adversely effect existing or future individuals or businesses then this should be addressed within the ES, for example within the socio-economics and population assessment.

Urban Services. The intention to undertake a separate Services and Infrastructure Report and the proposal to deal with the likely environmental effects of any temporary and permanent diversions (including continuity of supply) as part of the Demolition and Construction Chapter of the ES is welcomed.

Human health and safety. Contrary to what is stated in the Scoping Report, I consider that human health and safety is a legitimate EIA consideration as part of the consideration of likely effects on population. Nevertheless it is agreed that such issues (including those arising from match day crowds) can and should be picked up within the other appropriate assessment chapters of an ES. Officers have been aware of proposals to prepare separate reports relating to Regeneration and Community Impacts and commented on the scope of these documents in November 2009. It is important, however, that the assessment of all likely significant community

effects is included within the ES and that the ES considers any proposals set out in the proposed separate reports.

Sustainability. The complete separation of the EIA and consideration of sustainability matters is not considered appropriate. Although it is recognised that a sustainability appraisal can be provided separate to the ES, those elements of the proposed scheme that will contribute to its sustainability still need to be assessed within the ES. Likewise, the consideration of material assets (which includes resource use and energy) are legitimate EIA considerations as are impacts on the climate. This means that the ES will need to include consideration of energy, waste and carbon emissions, although this consideration does not necessarily need to be in the form of separate topic area assessment chapters within the ES. Specifically in relation to waste, in addition to providing details on waste management proposals for the demolition, construction and operation phases, if there is likely to be any loss, or effects, on existing waste infrastructure as a result of the proposed scheme then the effects of this will need to be addressed i.e. loss of recycling business, breakers yards etc.

### **Scheme Programme**

No indicative scheme programme is provided in the Scoping Report. As part of the scheme description for inclusion within the ES, it will be important to provide an indication of the likely phasing of the proposed development and it is anticipated that an indicative phasing programme will be included within the Development Specification. Related to this, it will be important to understand how site-wide functions such as site remediation, drainage, and the provision of utility connections are expected to be handled if the site is only made available in a piecemeal fashion. Likewise it will be important to understand:

- Which sites will be subject to demolition and construction works at the same time; and
- When individual blocks or phasing of development will be occupied and considered operational

Since the site will take at least ten years to complete, with the first residents being on site while later phases are being built, it is recommended that construction effects should be assessed as follows:

- General impacts affecting neighbouring communities and other off-site receptors should be assessed irrespective of when they may occur, by considering peak potential impacts.
- A full 'snap shot' description of an agreed period of peak activity should be developed including traffic and other effects from the completed portions of the scheme, and a realistic assessment of what construction equipment may be working on different parts of the site at that time. This snap shot description should then be assessed by all topic specialists as a discrete part of their assessment.

Once further information is available on the scheme programme, it will be necessary to agree an appropriate year with LB Lewisham for the above interim year assessment. As well as assessing the effects at the expected completion date (expected to be 2020), an assessment should be made of conditions 10 years later. For some topics there may be no change, but that should be simply stated.

## **Spatial Scope**

No comment is made in the Scoping Report on the overall approach to defining the spatial scope of the assessments, although in some instances the approach to the spatial scope is defined on a topic by topic basis. Whilst it is recognised that different effects are experienced over different distances, it would be preferable if the EIA coordinator could establish clear guidelines on terminology (i.e. local impact zone - within 500m, inner impact zone – within 2.5kms, outer impact zone- within 5kms of the site boundary) within which topic specialists could then exercise their professional judgement. This should be done by reference to the description and assessment of the site and its setting.

Given the size of the site, off site impact zones should be measured in terms of distance from the boundary of the site (i.e. buffered) rather than based on distance from the centre of the site (i.e. concentric circles).

## **Significance**

I would ask that a common approach to the assessment of significance be set out by the EIA coordinator and used by all topic specialists. This guidance should take into account all relevant considerations including the strength of likely changes, the sensitivity of the relevant receptors, and the temporal nature of the likely changes (frequency, duration, permanence etc).

It is not considered satisfactory for example to allow one topic specialist simply to distinguish between those effects that are significant and those that are not, while others used 3-point, 5-point, 7-point (etc) scales to describe degrees of significance.

Where professional best practice exists in relation to defining likely significant effects, it should be used to reach conclusions, but those conclusions should be described using terminology which is consistent throughout the ES i.e whether an effect is or is not significant and the scale at which it is significant (not the scale at which it is not significant).

The proposal in para 4.18 to consider net impacts and to assess purely against exceedance of normal variation in the baseline without the scheme is not always appropriate. For example, if the proposed development contributes to the continuation of an existing adverse environmental impact (although it already exists within the baseline) this should be assessed as a significant adverse impact, not considered not significant because it doesn't exceed the normal variation on the baseline.

The aggregation of a series of smaller adverse effects with a single larger beneficial impact is also not always considered appropriate, especially if the aggregation is achieved by aggregating effects that relate to different sources, pathways and receptors.

## **Cumulative Effects**

The approach to cumulative effects described para 4.23 is considered appropriate, as long as this approach does not fail to give due recognition to:

- The cumulative effects of the same type of impact i.e. one receptor effected by dust from the construction effects of three simultaneous phases of demolition and construction of the proposed scheme;
- The cumulative effects of repeat impacts on the same receptor (either from the same or different type of impact) over a period of time i.e. the same receptor being affected by three subsequent phases of demolition and construction of the proposed scheme;
- The cumulative effects that result from the combined effect of individually significant effects, and not just the combined effect of individual insignificant effects.

The Scoping Report sets out relevant schemes for baseline conditions and cumulative assessment. This is considered acceptable, subject to the inclusion of the following:

- Creekside Village East (based on resolved to grant scheme)
- Creekside Village West (based on consented scheme, currently under construction)
- Seager (based on consented scheme, currently under construction)

In addition, taking account of comments from the London Borough of Southwark, the following consented schemes need to be included

- Site A (LB Southwark reference 09-AP-1870)
- Leisure Centre (LB Southwark reference 09-AP-1999)
- Site C (LB Southwark reference 09-AP-1783)
- Site B1 (LB Southwark reference 07-AP-2588)
- Site B2 (LB Southwark reference 08-AP-2388)
- Mulberry Site (LB Southwark reference 07-AP-2806)
- Waste Transfer Facility at 763 Old Kent Road (LB Southwark reference 08-AP-2209)

I would be happy to help you assemble the relevant facts about the Lewisham schemes (e.g. number of consented/proposed homes and type and amount of non-residential floorspace).

### **Detailed Comments on Individual Topic areas**

As outlined above, detailed comments on these areas are set out in an appendix to this letter. For the avoidance of doubt, these comments form an integral part of this Scoping Opinion.

I hope this Opinion helps you and your clients undertake an environmental assessment which helps ensure that a high quality, environmentally sensitive and sustainable development is proposed for this important site. I would welcome on-

going discussion on the issues referred to above to assist in this process and to ensure that the Council has confidence in the ES that supports any planning application(s) for the site.

Yours sincerely

John Miller  
Head of Planning

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## Appendix 1

### **Surrey Canal Triangle EIA Scoping Opinion - Town and Country Planning (Environmental Impact Assessment (England and Wales) Regulations 1999: Regulation 10(1)).**

#### **Detailed Comments on Individual Topic areas**

Landscape, Townscape and Visual Impact. Paragraph 6.6 of the Scoping Report states: 'the level of detail to be included in the baseline study of the site, as existing, will be appropriate to the scale and type of the Proposed Development, the character and value of the townscape and the potential for the proposal to cause adverse or beneficial effects'. Whilst the principle of undertaking an appropriate baseline study is agreed, it is recommended that the applicant continues to engage with Council to agree what level of detail is actually required to make any such assessment appropriate. This is likely to be an iterative and evolving discussion as further details on the proposed development are provided.

The proposed view locations in Appendix 3 of the Scoping Report have already been agreed with officers. Nevertheless it would be useful for these locations to be shown on a plan to help capture the exact location (and also the direction) of the views. The views should also be classified as short, medium and long range to demonstrate the number of each.

Given the direct interrelationship between the townscape assessment and the archaeology and heritage assessment, in terms of the setting of built heritage, the proposed views should be reviewed to ensure they also adequately meet the needs of that assessment.

In relation to the above point and as recognised in Para 6.12, that the townscape assessment will consider access and permeability to the townscape as well as effects on acknowledge aspects of special interest and views, it is considered that the proposed 500m visual envelope proposed in para 6.6 is unlikely to be sufficient to capture the zone of influence of a project of this nature and scale and therefore it is recommended that a wider visual envelope is initially assumed and that as required this is enlarged or reduced through the completion of a desk-based assessment and ground truthing exercise.

The views identified in Appendix 3 should include views from:

- Southwark Park (location to be agreed with LB Southwark)
- Nunhead Cemetery (location to be agreed with LB Southwark)
- Caroline Gardens Conservation Area (location to be agreed with LB Southwark)

Archaeology & Heritage. The early assessment of the site's archaeological and heritage baseline will be important given the nature of the proposed development both in terms of the likely visibility of the site and its likely impact on the existing local townscape (including the setting of existing buildings), as well as the likely degree of earth and ground works associated with: the ground remediation; landscaping earthworks; basement excavations; and piling. The assessment should give specific consideration to the effects of site enabling works in addition to construction and operation effects i.e. the effects of excavations and site level changes, as well as works associated with remediation, drainage and utility requirements. Where

mitigation is likely to require flexibility to change the layout, function and use of space and buildings the potential effects of this will need to be picked up in the other assessment chapters.

The site is within an Area of Archaeology Priority, as identified by 'saved' UDP policy URB 21 (Schedule 3 identifies the site as being within the 'Thames Alluvial Floodplain' area the applicant should liaise closely with English Heritage (or their nominees) during the assessment process, and in particular in relation to any need to undertake site investigation works prior to submission of the planning application as identified in para 7.5. It is anticipated that the archaeological desk-based assessment report to be submitted as part of the EIA will in addition to using the existing borehole data also have the opportunity to recover information directly from any new geo-technical site work that may be planned during this period. Such direct involvement will enable two sets of information to be obtained from a single intervention programme and enable a coherent buried deposit model to be generated.

Para 7.3 proposes that a desktop study and walkover survey is undertaken for a study area of approximately 1000m radius from the centre of the site. Given the nature of the site (its irregular shape) and its size, this is considered inappropriate. Instead it is recommended that a minimum study area should be identified with a 1000m radius measured from the edge of the site and that in addition the desktop study should consider designated sites outside this area which could be effected (particularly in terms of their setting and context). As noted above, this should be informed by the Landscape, Townscape & Visual impact Assessment. Whilst some overlap between the assessments of built heritage and townscape is anticipated, every effort should be taken to minimise any unnecessary duplication arising from this.

An appropriate assessment of the planning policy context, as identified for inclusion with para 7.1, is welcomed although it should be noted that this is only required to the extent that it directly informs the ES and in particular the proposed methodology, significance criteria and proposed mitigation measures. The inclusion of a general review of planning policy at the national, strategic and local level within an ES is not a specific requirement of the EIA Regulations and therefore should be avoided in this and all topic assessments. In relation to the approach to assessment para 7.6 currently makes reference to PPG16, it is anticipated that the propose assessment will reflect the requirements of the new PPS5: Planning for the Historic Environment.

The final bullet point under para 7.8 attempts to define 'Positive Impacts'. This is welcomed, although it should be noted that as a point of principle, in general, where a positive impact is derived from an initial negative impact the positive effect is unlikely to exceed the negative one. For example, although excavation and recording of a feature of archaeological interest can be considered to have a positive effect in terms of increased knowledge and understanding of such a feature, in only a limited number of cases are these positive effects likely to outweigh the negative effect that the feature is no longer preserved in-situ.

The table provided under para 7.9 is presented as a means for determining significance, however this falls short of what is required. Significance should be defined by the magnitude, duration and frequency of an impact as well as the sensitivity and value of the receptor impacted, as appropriate this should include a consideration of spatial scale. The outcome should be a clear statement as to whether an impact is significant or not significant. In particular it is unclear from the

table whether all impacts be they major, moderate or minor are to be considered significant or not.

Whilst 7.10 refers to engaging with GLAAS to discuss any necessary mitigation strategy, earlier discussion with GLAAS over requirements of the desktop assessment.

Microclimate (Wind and Sunlight/Daylight). The intention to undertake a purposely-designed boundary layer wind tunnel study is welcomed and considered appropriate given the nature and scale of the development proposed and in recognition of the large number of pedestrians that will be accessing and passing through the site, particularly associated with match day crowds. The assessment of the design and layout of proposed buildings in relation to the existing context and topography of the site is also welcomed and the underlying assumptions and information used for this assessment should be consistent with that used in the other assessments i.e. in relation to modelling noise and vibration, air quality and flood risk.

Whilst some useful detail is provided on the proposed assessment methodology in para 8.5 to 8.10, the appropriateness of the assessment methodology selected will ultimately depend on the nature of the proposed scheme and the level of detail available on the proposals. What is missing is certainty on how the inherent tension will be resolved between an outline planning applications with all matters reserved and the need for sufficient information on scheme proposals to enable a physical model of the scheme to be built and tested in a wind tunnel. Likewise, no comment is made on the assessment of the phasing of the development or whether/how the multiple planning applications will be assessed i.e. individual, in combination and as a whole. Therefore, although the principle of undertaking wind tunnel testing and assessment to identify likely significant wind effects is welcomed, there will need to be on-going discussion and agreement with the Council on the detail methodology as further information is available on the scheme proposals. As part of these discussions it would be useful to receive a plan showing the coverage provided by 1:300 scale model and in particular the extent to which the whole site and adjoining sites will modelled.

It will also be important that the assessment compares (and significance is assessed against) likely future conditions against current baseline conditions to provide an indication of absolute change in environmental conditions, in addition to the assessment of suitability for proposed future use. This comparison against baseline conditions is a key element of EIA and will need to be addressed. Otherwise the assessment is purely a review of the ability of the design to meet prescribed design criteria. In considering baseline conditions this will be particularly important in relation to adjoining land uses as well as retained or re-provided areas of open spaces and access routes.

The proposed iterative design and assessment process, as described in para 8.8, is welcomed. It will be important that as far as possible any wind mitigation measures developed are included within the scheme proposals. Either way, it will be important to ensure that any such mitigation is then adequately assessed within the other assessment chapters and in particular in the relation to the landscape, townscape and visual impacts assessment

Given the height of some scheme elements and the proximity of receptors, the inclusion of a sunlight, daylight and overshadowing assessment will be important. The proposed approach is welcomed, but should be kept under review by liaison with the Council during the assessment process. In particular it will be important that at

least equivalent emphasis is placed on the assessment of likely effects on surrounding buildings, streets and amenity space compared to existing baseline conditions as is placed on meeting minimum acceptable guideline criteria.

Appropriate sensitive receptors in relation to wind and sunlight/daylight need to be identified and subsequent assessment undertaken irrespective of the boundary between LB Lewisham and LB Southwark.

Socio Economics and Population. The information provided on the baseline and the approach to the assessment in Section 9 is limited, making it difficult to assess whether significant socio-economic effects are likely or possible.

The scope of this assessment should be focused on 'Community Effects' in relation to both the existing and future community that occupy (and will occupy) the site and the surrounding area, what their existing and future needs are, how these will evolve, how they are currently being met and how they are likely to be met in the future.

The ES should therefore consider community effects in terms of the extent to which the proposed development may deliver a diverse, equitable and sustainable community. This will necessarily need consideration of, amongst other aspects, the ways in which longer-term maintenance and management of the development may influence positive outcomes. Comparable considerations which should be assessed include the skills and training, split of tenure, the availability of community facilities, communal open space and community outreach programmes. A purely statistical exercise that, for example, simply calculates total available school places and total demand, is not considered sufficient where it fails to consider the appropriateness of the available school places in relation to the nature of the community that require those places.

In terms of the assessment of the baseline, in addition to simply reproducing ward and borough wide demographic statistics, this should include site specific baseline information and commentary on the extent to which the ward and borough wide information is representative of the site itself. This baseline assessment should also consider the direct and indirect community value placed on the site in terms of not only an employment function, but also in terms of open space, access, informal recreation etc. The baseline should also take account of the permitted new Deptford Green Secondary School, which is due to deliver 130 additional secondary school places for the area (1,300 as opposed to the existing capacity of 1,170) from September 2012 onwards.

Within the section on the 'Approach to Assessment' no mention is made on the spatial scales to be considered. This will need to be defined and agreed with the Council, and it is recommended that three scales are identified, namely: site level; inner influence zone, outer influence zone. As necessary, cross borough boundary consideration and consultation will be required.

The impacts of additional retail provision on existing town centres, notably Surrey Quays Shopping Centre in LB Southwark, needs to be considered in addition to considering the impact of spending from the new community (9.6)

The recognition in para 9.9 that a number of organisations would be consulted as part of the assessment process, is welcomed and it will be important that those consulted is agreed with the LB Lewisham and that a full record of this consultation is captured within the planning submission. Cumulative socio-economic effects, particularly across borough boundaries are likely to be particularly relevant. With this in mind, Section 9 refers only to LB Lewisham and it will be important to also review LB Southwark's relevant policies, provision etc (9.4), population characteristics (9.5),

infrastructure planning documents (9.7) and both Lewisham and Southwark PCTs (9.9). Impacts on the need for school places is something that particularly needs to be considered on a cross-Borough basis.

Transport and Movement. The scope of the Transport Assessment should be considered separately by the Council and Transport for London (TfL). Some discussion took place between Renewal's consultants (Signet Planning and PBA) in August 2009, but the scope of the Assessment needs to be refreshed, taking account of the change in circumstances since this date, including subsequent work by Alan Baxter and Associates on behalf of LB Lewisham.

Para 10.1 states that the Transport Assessment (TA) will be undertaken in accordance with the TfL Transport Assessment Best Practice Guidance Document (May 2006), although this may be appropriate for the Transport Assessment, it is important to note that the Transport and Movement section of the ES should not simply be a repeat or summary of the information presented in the TA, or a description of the scheme proposals in transport terms.

Whereas the TA will consider the effect of the proposed development on the transport network, the environmental assessment should consider the effect of the proposed development on both existing and new users of the transport network. In accordance with best practice guidance this will need to consider issues of: severance; driver delay; pedestrian delay; pedestrian amenity; fear and intimidation; and accidents and safety. In particular reference should be made to the 'Guidelines for the Environmental Assessment of Road Traffic (Jan 1993), Institute of Environmental Assessment.

Para 10.9 specifically identifies the need to consider the pattern, mode and travel characteristics of football supporters with regard to their travel to the site and access across the site into the stadium. This is welcomed as this will be an important consideration in relation to not only the football supporters but also the other users and residents of the site and the surrounding area.

Para 10.11 identifies likely mitigation for the potential effects identified in para 10.10. It is anticipated that the control of construction traffic, public transport improvement and the development of a Sustainable Transport Strategy (including Travel Plan) will form a core component of the scheme proposals and therefore these form part of the scheme and should be described and assessed as such. These should not be double counted as mitigation proposals within the ES.

Noise and Vibration. It is important that the noise and vibration topic specialists liaise closely with the Council's Environmental Health Officers, particularly as regards the choice of survey locations and modelling approach and extent.

Section 11 makes reference to noise surveys including PPG24 assessment. It is recommended that both long and short term noise surveys to be undertaken. The long term survey to be undertaken as a minimum over 4 days covering the weekend and should include the following parameters: LAeq, LA90, LA10 and LAMax. Use of noise map is welcomed. Noise impact on future occupants to be assessed in terms of BS8233 (LB Lewisham recommend good standard in BS8233). Fixed plant noise to be assessed in terms of BS4142 and again our policy is that the rating level should be 5dB below the lowest background at any time.

Construction/demolition noise to be assessed in terms of BS5228 and construction/demolition vibration to be assessed as per the guidance in BS6472.

Reference should be made to Lewisham CoCP and the s61 procedure under the Control of Pollution Act 1974 be utilised for the demolition/construction phase.”

The assumptions that underpin the TA should be fully consistent with those within the noise and vibration. Transport and noise and vibration surveys (in terms of timing and location), as far as is reasonable and sensible, should be coordinated to ensure compatibility and consistency.

The baseline surveys should be undertaken outside school holidays. The intention to undertake night time, day time as well as match and non-match day noise and vibration surveys is welcomed.

The assessment should consider the usability of all proposed open space within the development (both public and private), as well as the usability of balconies, should they subsequently be proposed. In relation to the football club, if the stadium is or will be used for alternative uses that have the potential to cause noise, these should be appropriately captured and considered.

In terms of mitigation, a clear distinction should be made between mitigation which forms part of the scheme proposed and mitigation which is additional ‘extra-over’, arising out of the final EIA assessment process, to deal with outstanding likely adverse effects.

Air Quality. The scope of the Air Quality assessment should consider any issues of odour as part of the assessment. As with the Noise & Vibration assessment above it is important that the air quality topic specialists liaise closely with the Council’s Environmental Health Officers, particularly as regards the choice of monitoring and modelling locations as well as the spatial extent of the assessment.

The Energy Assessment for the scheme is expected to set out the alternative energy solutions that have been considered and the Council expects the Air Quality section of the ES to outline how the environmental impacts associated with the various options were considered as part of deciding on the preferred solution.

In relation to the spatial scope of the assessment, in addition to focusing on those receptors likely to experience the highest concentrations or greatest change in concentrations as a result of the development, the extent of the likely effects also needs to be considered. In addition, where possible, likely effects should be quantified in terms of the extent of the area likely to be effected as well as total number of properties and or individuals. The assessment should consider the usability of all proposed open space within the development (both public and private), as well as the usability of balconies, should they subsequently be proposed.

The assumptions that underpin the TA should be fully consistent with those within the air quality of the ES.

Para 12.4 correctly identifies the need to consider the likely effects of the proposed development on SELCHP and the likely effect of SELCHP on the proposed development. This is likely to be a key consideration, as it is likely that the SELCHP and in particular the performance and operation of the stack were designed to take account of the then existing surround land uses and buildings. It will therefore be important to consider the likely effects of the introduction of the relatively high residential blocks within the scheme proposals and any need to increase the height of the stack.

In its comments in response to the Council's consultation on the Scoping Report, the Environment Agency pointed out that it currently regulates (under the provisions of the Environmental Permitting (England and Wales) Regulations 2010) a number of waste transfer stations at Bolina Road, Landmann Way and Mercury Way, and regularly receives complaints from residents living in close proximity to the sites in relation to site activities. It goes on to say that the applicant may wish to address this issue in the Air Quality section and take further advice from the Council's Environmental Health Officer.

The Development Control: Planning for Air Quality (2006 Update referred to in 12.14) has been updated and the reference should now be to the 2010 EPUK guidance on Development Control.

Groundwater, Soils and Contamination. It is important that the baseline survey of the site including a site walkover is undertaken as soon as possible and that the results of this baseline assessment are discussed with the Council's Environmental Health Officers and the Environment Agency to further define and agree the scope of this assessment.

In the absence of any information of the likely soil conditions, groundwater and contamination on the site, at this stage, the working assumption should be that there will be a need for a Phase 2 Site Investigation to inform the ES.

Para 13.6 and 13.7 seem to be heavily focused on a risk assessment approach to the assessment, and it will be important that the final assessment chapter included within the Environmental Statement is an EIA assessment and not simply a Phase 1 desktop study and / or Phase 2 site investigation.

It is also important that within the assessment any consideration of mitigation distinguishes between 'incorporated mitigation' and additional mitigation, and that any remediation strategy is fully assessed by all relevant topic specialists. At present this distinction is not made within para 13.8.

Where significant earthworks are proposed, and or there are works proposed on or adjacent to existing earthworks issues of ground stability (i.e. in relation to the railway embankment) will also need consideration.

Further consideration and discussion is also likely to be required at to the extent to which remedial measures can be undertaken in either a site wide or in a phased approach within each of the discrete planning application areas and the extent to which mitigation measures can be incorporated in a construction phase adjacent to an operational phase with no significant adverse impacts to either.

Water Resources and Flood Risk. Section 14: Water Resources and Flood Risk is heavily focused on design issues related to surface water drainage and the preparation of the Flood Risk Assessment and although important, sight should not be lost on the need for the preparation of an appropriate EIA chapter. The views of the Environment Agency will be important in agreeing the approach and detailed methodology for the FRA and it is recommended that the applicant enters into a process of ongoing engagement and review with them. The Environment Agency made the following comments in response to the Council's consultation on the Scoping Report:

"Where an ES is to be produced for a development we suggest that the Flood Risk Assessment (FRA) is included as an appendix to the ES which can be read independently. This approach ensures that flood risk issues are properly considered rather than the piecemeal approach with flood risk issues covered

under a Water Resources section and elsewhere within an ES.

We support the approach to the detailed FRA as set out in the scoping report and would add the following:

*Sequential and Exception Test PPS25.* PPS25 implies that a sequential 'risk based' approach to determining the suitability of land for development in flood risk areas should be applied at all levels of the planning process. Local planning authorities should apply the sequential approach as part of the identification of land for development in areas at risk of flooding (see annex D and Table D1 of PPS25). The test should demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed.

If following the application of the sequential test as per Annex D (PPS25), it is not possible for the development to be located in zones of lower probability of flooding, the Exception test can be applied as detailed in paragraphs D9 to D14.

*Sources of flooding.* An analysis of all potential sources of flooding, and how the identified sources of flooding can be minimised, mitigated or eliminated. Thus an assessment shall be undertaken for current climate conditions as well as cater for climate change. This may require further hydraulic modelling to be undertaken, and how the identified sources of flooding can be minimised, mitigated or eliminated. For residential development, climate change should be considered over at least 100 years and commercial development over at least 60 years.

- Over-topping and breach analysis of the flood defence (please see below for further details).

- An assessment of surface water flooding risks and attenuation measures to be implemented. This should detail the extent of surface water runoff and any potential surface water flooding as a consequence of the development, both on and off site. This should be assessed over a range of storm durations for a 1 in 100 year return period event and it is normal for the Environment Agency to request a reduction in run off rates depending on location of discharge. If runoff is to be discharged directly to the River Thames, Environment Agency consent is required for any new outfalls and discharge quality standards will need to be satisfied. If runoff is to be discharged to the surface water/sewage system, you are advised to consult with Thames Water.

Surface water runoff rates should be reduced in line with greenfield runoff rates of 8l/s/ha for this region. This should be accomplished through the use of SUDS wherever possible. The development covers a large area so the use of SUDS should be easily achievable throughout the site.

The Environment Agency promotes the use of green roofs throughout the site.

*Breach Analysis.* The normal parameters for modelling a breach in a hard defence is to assume that the breach is 20-metres long and down to the ground level landward of the flood defence structure. A rising tide should be considered as this gives the greatest volume and thus depth of floodwater. A breach at the peak of the extreme tide should also be considered as this gives

the peak velocities and is thus worst for time of onset. It follows that the breach location worst for maximum depth and the location for maximum velocity may not be the same. Further that the critical location for a breach of the tidal defences may not be local to the site. This is because a location further away may have a lower landward ground level and thus a greater potential breach flood flow.

The tidal defences were designed to a 1 in 1000 year standard in terms of their crest level and therefore we expect third party works and development in London to follow this standard.

*Land contamination and groundwater protection.* The site is not in an Source Protection Zone (SPZ). It is located on alluvium underlain by Chalk and the groundwater level is approximately 10mbgl.

We welcome the use of SUDS mentioned in the EIA, although this will only be suitable if there is no contamination on the site. The assessment also describes ground and groundwater treatment including decontamination and remediation works where necessary. We would advise that where contamination is found you should follow the process of preliminary risk assessment or desk study, followed by a site investigation, followed by an options appraisal and remediation strategy and finally a verification plan.

As part of the assessment of all potential forms of flooding (including consideration of the implications of climate change), it will be important that the FRA includes a suitable breach analysis. Where it is identified that the site will be dependent on infrastructure currently located within the floodplain, an assessment of the consequences of this infrastructure failing during a flood event should be undertaken. Specific consideration should also be given to the proposed inclusion of basement areas within the development.

Within the ES it will be important that certainty on phasing and implementation is given in relation to the surface water drainage strategy, which should form part of the scheme for assessment. As a minimum an over-arching conceptual approach should be identified. Without this any detailed assessments associated with individual planning applications and or construction phases may limit the opportunity for holistic solutions.

Ecology. Para 15.1 refers to the site as 'highly urbanised' and para 15.5 states that 'the site is considered to be of limited ecological value and it is expect that any required mitigation/enhancement measures in respect of ecology/nature conservation would easily be deliverable with the proposed scheme'. Although both statements are not necessarily incorrect it would appear that insufficient importance has been placed on the existing ecological value of the site and its setting. Lewisham UDP 'saved' Policies OS5 and OS12 identify the adjoining railway embankments in Lewisham as a 'Green Corridor' and 'Site of Borough Importance (Grade II)'. The railway embankments around South Bermondsey Station are identified as a 'Site of Importance for Nature Conservation' (Grade 2) in Appendix 13 of Southwark's UDP (Reference OS 80), under extended Policy 3.28 Biodiversity)

There will, therefore, need to be a series of species and habitat surveys to be undertaken prior to any planning application submission(s) to inform the design proposals and underpin ecological impact assessment in the ES.

Even where these surveys identify the site to be of limited ecological value, they will be useful in identifying the ecological potential of the site and therefore the most appropriate ecological enhancement proposals.

The recognition in Para 15.4 that 'the results of the Phase 1 habitat survey, and information received from third party consultees will be used to guide the need for additional species of habitat specific surveys' is welcomed, and these additional habitat and species specific surveys should be agreed with the Council. In undertaking the desktop assessment it is recommended that a 1km to 2km buffer from boundary of the site is used to define the study area, with consideration of designated sites up to 5km from the edge of the site. Subject to the outcome of the desktop assessment it is considered that in addition to covering the whole site, the Phase 1 survey should also include a buffer area of 250m to 500m from the edge of the site boundary.

In terms of the baseline surveys, reference is made to the now dated Institute of Environmental Assessment (1995) Guidelines for Baseline Ecological Assessment. It should be noted that this has now largely been superseded by the Institute of Ecology & Environmental Management (2005) guidelines for ecological impact assessment in the UK, referred to in para 15.6. It is worth noting that the JNCC's 1990 standards were revised in 2003. In para 15.3 incorrect reference is made to BS5835 in relation to the tree survey, the reference should be to BS5837. In para 15.9 reference is made to the Conservation (Natural Habitat etc) Regulations 1994, where in fact this should refer to the 2010 equivalent.

Natural England is generally satisfied with the proposed scope of the EIA. However, it expects details of how environmental mitigation and enhancement measures are to be incorporated into the development to be set out in the full planning application. We also recommend that, dependant on the amount of biodiversity net gain that is achievable within the development, an Ecological Mitigation and Management Plan (EMMP) is included within the application. This can be used as a mechanism for formalising and delivering the proposed mitigation and enhancement measures and should include details of how these will be monitored, managed and funded in the future.

**Appendix 17.4 Copy of Ecology Solutions briefing note regarding surveys undertaken and response to London Borough of Lewisham's Scoping Response**



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## SURREY CANAL TRIANGLE

November 2010

### **SURVEY NOTE AND RESPONSE REGARDING THE LEWISHAM BOROUGH COUNCIL SCOPING REPORT**

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#### **Background**

The purpose of this report is to summarise the results of the survey work undertaken at the Application Site during 2009 and 2010 and to present Ecology Solutions considered opinion with regard to the suggested survey effort as documented within Lewisham Borough Council's Scoping Report dated 14<sup>th</sup> July 2010.

Full details of all ecological survey work undertaken, together with an assessment of the potential significant environmental effects of the proposed development and details of any necessary mitigation and enhancement measures will be presented within the Ecology Chapter of the Environmental Statement to be submitted as part of the Environmental Impact Assessment (EIA).

At this stage, we set out the information considered necessary and relevant in responding to the issues raised within the Scoping Report provided by Lewisham Borough Council.

#### **Site Characteristics**

The Application Site is located within the London Borough of Lewisham and comprises Millwall Football Stadium together with existing commercial / industrial buildings and hardstanding. The Application Site is set within existing residential and commercial / industrial development. It is roughly triangular in shape with the north-western and north-eastern boundaries comprising railway lines and their associated vegetated embankments. Surrey Canal Road dissects the Application Site in the south with a further small parcel of commercial / industrial land present within the red line boundary south of this road.

#### **Survey Methodology and Results**

A Phase 1 walkover survey was carried out in July 2009 in order to identify the main habitats, the broad plant species present and to determine their ecological significance. Due to access constraints, it was not possible to walk the whole of the Application Site during this visit.

A further Phase 1 survey of the whole of the Application Site was undertaken during October 2010. Full access to the whole Application Site was available at this stage.

General faunal activity observed during the course of the surveys was recorded, whether visually or by call. Specific attention was paid to the potential presence of any protected, rare, notable or Biodiversity Action Plan species.

In addition specific surveys for the presence of bats and Badgers were undertaken during 2009 and 2010.

### Habitats

The vast majority of the Application Site comprises buildings and hardstanding of limited intrinsic ecological value (see below in respect of value to faunal species).

A stand of Japanese Knotweed is present in the west of the Application Site. It is considered that this has spread into the site from the adjoining railway embankment where this species is prevalent.

### Bats

The buildings and trees within the Application Site were assessed for their potential to support roosting bats during 2009 and 2010. Binoculars were used where necessary.

Full external surveys of all buildings were undertaken during October 2010, with general suitability for bats and any obvious access points recorded. These external surveys were followed up with internal inspections to search for evidence of bat activity (i.e. droppings, scratch marks or bats themselves) within roof structures and building fabric. Ladders, torches, binoculars and an endoscope were used as appropriate.

Specific bat activity surveys were undertaken during September 2009. Transects were walked at the perimeter of the site and also in those parts of the Application Site where access was possible.

No evidence for the presence of any roosting bats was recorded during the surveys and the vast majority of the buildings present are considered suboptimal to support this group.

No significant bat foraging activity was noted during the activity surveys. Such activity was limited to very low numbers of foraging Common Pipistrelle bats (most likely one or possibly two individual bats) recorded along the railway line to the east of the Application Site.

### Badgers

During the course of the surveys undertaken in 2009 and 2010, specific attention was paid to the potential presence of Badgers within the site and an assessment of the suitability of the site for this species was made.

No evidence for the presence of Badgers was noted during the course of the walkover survey and given those habitats present within the Application Site and wider area, it is considered that this species would not utilise the Application Site for either shelter or foraging.

### Breeding Birds

The Application Site offers limited potential to support breeding birds. The buildings may offer nest building potential for some species such as House Sparrow *Passer domesticus* and Starling *Sturnus vulgaris*.

It is considered that specific breeding bird surveys would not be required.

Proposed mitigation / enhancement measures will be focussed upon ensuring that nesting birds are not disturbed during the main breeding season and that nesting / foraging opportunities for a range of bird species including Black Redstart, Swifts and House sparrow are provided.

### Amphibians

No suitable aquatic habitat (e.g. ponds, ditches) for amphibian breeding purposes is present within the Application Site. Given the habitats present within the Application Site, the surrounding land use and the separation of the Application Site by infrastructure and built form, it is considered that amphibians (including Great Crested Newts) would not be present.

### Reptiles

The Application Site itself does not contain suitable reptile habitat. The grassland and scrub habitats associated with the railway embankments (outside of the Application Site) may support common reptile species such as Common Lizard *Lacerta vivipara*, Slow-worm *Anguis fragilis* and Grass Snake *natrix natrix*.

The presence of reptiles within off site habitat would not represent a constraint to development. Any minor and temporary impacts to this off site habitat (e.g. through storage of materials etc) could easily be mitigated through simple measures such as supervised ground clearance.

## **Consideration of Lewisham Borough Council's Scoping Report**

Broadly speaking, Lewisham Borough Council's Scoping Report states that the following items need to be addressed within the ES:

1. Potential Impacts on the adjacent railway embankments which are designated as sites of conservation value within Lewisham's UDP;
2. Potential Impacts on embankments around South Bermondsey Station which are designated as sites of conservation value within Southwark's UDP;

3. Specific species and habitat surveys will be undertaken pursuant to the results of the Phase 1 and desk based surveys. The scope of the specific surveys are to be agreed with the Council;
4. The desk survey is to utilise a study boundary (extending from the Application Site boundary) of 1 – 2km for species / habitats and 5km for designated sites;
5. The Phase 1 survey should cover an area extending to 250m – 500m from the edge of the Application Site boundary;
6. Appropriate mitigation and enhancement measures to be included, possibly subject to an Ecological Management Plan.

### Items 1 and 2

Items 1 and 2 of the Scoping Report are concerned with potential impacts on local designated sites.

Ecology Solutions concur that potential impacts on these designated sites will need to be assessed as part of the EIA. Potential impacts on all statutory and non-statutory designated sites will be assessed as part of the Ecology Chapter of the ES.

### Item 3

Item 3 is concerned with the need to undertake further specific species surveys, dependant upon the results of the Phase 1 habitat survey.

The Phase 1 survey identified the need to undertake specific bat survey work. Both internal / external building surveys and additional evening bat activity surveys have been undertaken. No further bat survey work is considered necessary.

Given the habitats present within the Application Site, no further specific species surveys are considered necessary.

### Item 4

Item 4 is concerned with defining an acceptable radius for which impacts on species and designated sites should be assessed as part of the desk based assessment. Ecology Solutions requested search areas for desk studies are 3x3 km<sup>2</sup> for protected / notable species and 5x5km<sup>2</sup> for designated sites. In respect of European designated sites, Ecology Solutions generally assess potential impacts at distances of up to 5km from the Application Site boundary. Natural England has always been supportive of this approach and Ecology Solutions see no reason to alter our approach in this instance.

### Item 5

Under Item 5 it is recommended that the Phase 1 survey area be extended to cover land up to between 250m – 500m from the edge of the Application Site boundary, dependant upon the results of the desk based survey.

Ecology Solutions propose to use desk based survey information in association with that information obtained on the Application Site and its immediate surroundings during the Phase 1 survey to inform the assessment of the proposals as part of the EIA process. It is considered that no further detailed site based assessment is required in respect of off-site habitats. Furthermore, it should be noted that detailed assessments are not possible in any event for much of the land in the vicinity of the Application Site due to access restrictions. Access to the designated railway

embankments is heavily restricted for reasons of health and safety and other land is principally in the control of private firms / individuals.

### Item 6

Item 6 is concerned with mitigation and enhancement measures. It is considered that the required mitigation measures will be largely limited to mitigating potential impacts on the adjacent designated sites of nature conservation value, though mitigation will also be required in respect of nesting birds and for the appropriate treatment of Japanese Knotweed where applicable.

Specific enhancements will be delivered in respect of a range of species / groups including Black Redstarts, House Sparrows, Swifts and bats. Current guidance and research is to be used in order to inform the design of specific enhancements for these species / groups within the Proposed Development. The inclusion of grassland, green roofs and other landscape planting utilising species of known wildlife value, will provide a significant enhancement over the current situation.

### **Conclusions**

Phase 1 habitat surveys were undertaken at the Application Site by Ecology Solutions in 2009 and 2010. Further specific surveys in relation to bats and Badgers have also been undertaken. The results of these surveys show that the Application Site itself is of extremely limited ecological value and it is considered that no other detailed species surveys are required.

Whilst Ecology Solutions concur with the broad principals of the survey remit as detailed within Lewisham Borough Council's Scoping Report, Ecology Solutions consider that given the results of the surveys and analysis undertaken to date, some of the recommendations within the report are over precautionary. In particular, Ecology Solutions consider that the desk based analysis in respect of designated sites need not extend to 5km from the site boundary (except in relation to European sites), but that a 5x5km<sup>2</sup> search radius is appropriate. Furthermore, it is considered that additional detailed Phase 1 habitat surveys are not required in respect of off-site habitats in this instance, but that desk based studies and information obtained during the surveys already undertaken can be relied upon to provide a robust assessment.

Full details of all ecological survey work undertaken, together with an assessment of the potential impacts of the proposed development on ecological receptors and details of any necessary mitigation and enhancement measures will be presented within the Ecology Chapter of the Environmental Statement to be submitted as part of the EIA.

It is hoped that given the results of the survey work undertaken to date, Lewisham Borough council will concur with Ecology Solutions opinion that further detailed survey work is not required in this instance, and that the survey remit as set out within this note is appropriate for determining likely significant effects pursuant to undertaking the EIA.

**Appendix 17.5 Copy of email from London Borough of Lewisham Dated 17<sup>th</sup> November 2010**

**From:** Paula Carney [PaulaCarney@signetplanning.com]  
**Sent:** 20 November 2010 10:30  
**To:** Karl Goodbun; Tim Goodwin  
**Cc:** Rachel Greenhoff  
**Subject:** FW: SCT - Ecology Surveys and Summary of Findings

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**From:** Graham Harrington [mailto:ghpa@orange.net]  
**Sent:** 17 November 2010 10:33  
**To:** Paula Carney; Graham Harrington  
**Cc:** chris.brodie@lewisham.gov.uk; Karl Goodbun; Tim Goodwin; Rachel Greenhoff; Mark Taylor; nick.pond@lewisham.gov.uk; David Knapman  
**Subject:** RE: SCT - Ecology Surveys and Summary of Findings

Paula

Thanks for giving us a chance to comment on this. I have consulted with David Knapman of Capita Symonds and Nick Pond, the Council's Ecological Regeneration Manager and have the following comments.

**Item 3**

Ecology Solutions' response in relation to bat surveys is acceptable, providing that the surveys have been carried out in line with best practice. No doubt the methodology part of the ES Ecology section will explain what has been done and how. As a general point, it is noted that survey work was carried out in October, which is a sub optimal time, and the reasons for this and how this has been taken into account should also be addressed when outlining methodology.

**Item 4**

This is acceptable, but please make sure you pick up all relevant Local and Metropolitan sites of nature conservation interest.

**Item 5**

The difficulty in surveying the railway embankments is acknowledged. However, a good desk top survey is needed and this should take account of;

- \* any relevant assessment undertaken as part of the EIA for the East London Line Extension
- \* the results of the GLA extended phase 1 survey in 2005 – which can be accessed via the following link

<http://wildweb.london.gov.uk/wildweb/PublicFind.do?type=borough>

Local knowledge suggests that bats and reptiles are likely to be the most relevant protected species – using the embankments as corridors. Ecology Solutions needs to consider the need for reptile fencing during demolition and construction phases. Also, a lighting strategy needs to be identified for both the demolition/construction and operational phases, to ensure that the embankments remain dark places at night.

**Item 6**

The mitigation referred to is encouraged. LBL will want comfort that the Parameters allow for a sufficiently deep substrate for living roofs in order to ensure that these will be generous high quality habitat spaces. Please also see the two issues raised under Item 5 above.

I hope this helps

Graham

## Appendix 17.6 Ecological Features

### Amenity Grassland

1. Narrow strips of amenity grassland are present along Surrey Canal Road; which dissects the south of the Site. A narrow strip of amenity grassland is also present at the western boundary of the Site, below Bolina Road. These areas are species-poor and of limited ecological value; Dandelion *Taraxacum officinale agg.*, Yarrow *Achillea millefolium*, Chickweed *Stellaria media*, Rye Grass *Lolium perenne*, White Clover *Trifolium repens*, and Common Mallow *Malva sylvestris*. The grass strip adjacent to the boundary shrubs is less managed and, as a result is longer with the addition of Nipplewort *Lapsana communis*, Buddleia *Buddleia Davidii* and Ivy *Hedera helix*.

### Amenity Planting

2. Amenity shrubs and small trees are present within the Site, principally along Surrey Canal Road. These form part of the boundary between the industrial area and the road. They comprise Scotts Pine *Pinus sylvestris*, Ash *Fraxinus excelsior*, Mountain Ash *Sorbus decora*, Buddleia, Snowberry *Symphoricarpos albus*, Hawthorn *Crataegus monogyna*, Cotoneaster *Cotoneaster sp.*, Norway Maple *Acer platanoides* and Privet *Ligustrum ovifolium*. Some areas are unmanaged and as a result are becoming smothered by Hedge Bindweed *Calystegia sepium*. A tiny area of amenity planting is also present in front of the community centres entrance; this comprises a few small amenity shrubs.

### Japanese Knotweed

3. Japanese Knotweed *Fallopia Japonica* is present in three locations on the Site, see Figure 17.2. These areas are directly adjacent to the railway embankments where it is also present and it is from these embankments that the Japanese Knotweed is considered to have spread into the Site from.

### Trees

4. A total of 60 individual trees and 12 tree groups have been identified within or adjacent to the Site. These trees / tree groups and their locations are detailed within the Arboricultural Statement prepared by CBA trees. Tree species recorded include, Flowering Cherry *Prunus sp.* Indian Bean Tree *Catalpa bignonioides*, Sycamore *Acer pseudoplatanus*, London Plane *Platanus x hispanica*, Common Lime *Tilia europaea*, Weeping Willow *Salix chrysocoma*, Ash *Fraxinus excelsior*, Norway Maple, Horse Chestnut *Aesculus hippocastunum*, Goat Willow *Salix caprea*, Wild Cherry *Prunus avium*, Elder *Sambucus nigra*, False acacia, Leylandii Cyprus *Cupressus x leylandii* and Silver Birch *Betula pendula*. The tree groups, as referred to in the Arboricultural Statement principally comprise a mix of native and non-native shrub species, as detailed under amenity planting above.

## **Hardstanding**

5. The Site comprises buildings and hardstanding, with roads, building forefronts and car parks all surfaced with tarmac.

## **Buildings**

6. Buildings within the Site have been numbered B1 – B23 and are described in detail below.
7. B1 is a pre-fabricated metal building with a steel frame and a pitched roof. The corrugated metal roof has a number of skylights and the interior is lit by florescent tubes. The building is in regular use for the storage of building materials.
8. B2 is a corrugated metal shed; it has a pitched roof with skylights and is in regular use.
9. B3 is a corrugated metal shed with a flat roof; it is in regular use.
10. B4. Is a brick-built two-storey building, the double-pitched roof was turnerised 5 years ago and as a result many of the pre-existing gaps have been blocked. Inside there are wooden soffit boards with no obvious gaps. The building is in regular use; the first floor for storage, the second is in use as offices.
11. B5 is a large, brick-built former warehouse with a flat roof. Some of the panes in the large windows are broken; however, the building is otherwise well-sealed. The building is in constant use as artists' studios, it is thought that it will be retained.
12. B6 is a brick-built building with a pitched, slate tiled roof. Some of the tiles are loose. The building is insulated with fibreglass insulation and inside it is dusty with lots of cobwebs.
13. B7 is a brick-built, two-storey building. It was renovated approximately 5 years ago and is well-sealed with no obvious gaps in the roof.
14. B8 is brick-built, three-storey block of flats which has been newly built; it has a flat roof and there are no apparent roof spaces / voids.
15. B9 & B10 are metal-framed structure with skylights; B9 is currently used as a garage.
16. B11 & B12 have pitched roofs, windows and no obvious voids. They are in regular use as workshops.
17. The large two-storey warehouse building (B13) is partly brick-built however; a large proportion of its shell comprises large corrugated metal shutter doors, there is also corrugated metal around the windows. The well-sealed roof is slightly pitched and made of corrugated metal/asbestos.

Skylights make up around 10% of the roofs surface and the interior is reasonably bright as a consequence. The eastern half of the building is used daily by a distribution company as storage and as office space, although this is thought to be on a temporary basis. There are no voids in the roof space.

18. Units B14-17 are built from breeze-blocks and corrugated metal. Their flat roofs are insulated and PVC coated, with no voids and skylights covering around 20% of their surface. The interior is well-lit with a number of fluorescent tubes. Many of the buildings are in regular use as workshops.
19. Building Group 18 consists of prefabricated, single-storey metal and brick units which were built during the 1970-80's. All of these buildings have sky lights; however the majority of them have no apparent cavities. Some of the buildings have air vents, and some gaps in their roofs and windows. Most of the units are in use as garages and can be noisy as a consequence. Some buildings were subject to an arson attack in February 2010, subsequently a number were to be replaced shortly after the most recent survey was carried out. Buildings and hard-standing are present to the east; the railway is along the western edge.
20. Building Groups 19 & 20 are constructed of breeze-blocks and have corrugated metal roofs with sky-lights. Inside there are a number of metal containers which are used for storage and are well-sealed. The buildings are in regular use, mainly as garages, and are therefore prone to disturbance on a daily basis. Railways lie both to the west and to the north of this most northerly corner of the Site.
21. B21 comprises an indoor football pitch, which is canvas domed.
22. The Community Centre (B22) is a two-storey partly brick-built building, with some metal framing and the mid entrance section glass-fronted. It is well-sealed with no obvious voids.
23. Millwall Football Stadium (B23) dates from the mid-1990's and is largely constructed from brick and corrugated metal. Inside it has steel supports and transparent plastic sides; it accommodates 20,000 spectators and has a number of floodlights.
24. There is a metal bridge on brick supports in the south-eastern corner of the Site, see Figure 17.2.

### **Background Records**

25. Several records were returned as part of the desk study exercise for notable plant species. None of these records fall within the Site itself, the closest record is for Black Poplar *Populus nigra subsp. betulifolia* located 0.8km from the centre of the search area and is therefore well removed from the Site. Other records provided include those for cornflower *Centaurea cyanus*, and Fine-leaved Sandwort *Minuartia hybrid* also from locations well removed from the Site.