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Our Ref: 550946IM18JUL17LV04

Dear Claire,

6-10 Sherman Road, Bromley

APPLICATION FOR PLANNING PERMISSION FOR REDEVELOPMENT OF 6-10 SHERMAN ROAD, BROMLEY - REQUEST FOR SCREENING OPINION IN ACCORDANCE WITH THE TOWN & COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT (EIA)) REGULATIONS 2017.

Greengage Environmental Ltd. is writing on behalf of our clients, Be Living, to formally request a Screening Opinion as required under the Town and Country Planning (EIA) (England & Wales) Regulations 2017, (hereafter 'EIA Regulations'), in relation to an application for a development of 6-10 Sherman Road, within the administrative boundary of the London Borough of Bromley (hereafter the 'application site').

In order to inform your Council's Screening Opinion, we set out below a brief description of the nature and purpose of the proposed development and a preliminary identification of its potential impact on the environment.

An application should be considered as an 'EIA development' only if the particular type of development and its specific impacts are likely, in that particular location, to result in significant effects on the environment.

For the reasons outlined below, we consider that the proposed development would have limited environmental effects and will not warrant formal EIA under the EIA Regulations.

#### Site Description

The application site covers an area of approximately 0.2 hectares (ha) and is centred on National Grid Reference TQ403696 / TQ4039769633, OS Co-ordinates 540397, 169633. The site sits in an urban location close to the centre of Bromley in south east London. A series of brick commercial buildings cover much of the application site with an area of hardstanding car parking at the southwest end. Bromley North railway station borders the application site to the west with a highrise building bordering to the northeast and Sherman Road to the southeast. A site location plan is shown in Figure 1.

#### Proposed Development

Current proposals include the demolition of the current site to build a residential development that will support a 'Build to rent' scheme. The proposed development will consist of a 21-storey building



comprising approximately 119,000ft<sup>2</sup> residential space consisting of 203 units ranging from studios to three bedroom apartments, and around 4,400ft<sup>2</sup> of commercial space.

## Legal Context

Whilst the EIA Regulations came into force on May 16<sup>th</sup> 2017, the DCLG online EIA Planning Practice Guidance is yet to be updated. We have therefore used the current version (last updated in 2014) as a reference and related it to the current EIA Regulations where possible. In addition, we have also referenced the industry guidance contained within the Guidelines for Environmental Impact Assessment issued by the Institute of Environmental Management and Assessment (IEMA, 2004).

Figure 1.2 sets out the screening process in determining whether an EIA is required and is the approach we have followed in assessing the need for a formal EIA.

The proposed development does not fall under the description of a Schedule 1 development as defined by the EIA Regulations that would automatically require a formal EIA. We do however consider that the development falls within the descriptions in Category 10, 'Infrastructure projects', of Column 1 under Schedule 2. A development of this nature is specifically listed under Category 10 (b) 'Urban development projects'.

If the development is listed in Schedule 2, the next test is to assess the area for its environmental sensitivity. The EIA Regulations provide definitions of those areas that are regarded as 'sensitive', and these include Sites of Special Scientific Interest (SSSI), National Parks, World Heritage Sites, Scheduled Monuments, and internationally designated sites. Reference to the Multi-Agency Geographic Information for the Countryside (MAGIC) online database, used to assess the site's location in relation to any sensitive designations, has identified that the development is not situated within any of the areas which are defined as an environmentally 'sensitive' areas in Section 2(1) of the EIA Regulations.

Therefore, the application must be compared with the thresholds and criteria in Schedule 2, Category 10. The relevant 'exclusion' threshold, under which developments do not need to be screened, for the Urban development projects category, is if 'the development includes more than 150 dwellings'. As the proposed development is approximately 203 units, this is exceeded.

Guidance document 'Annex: Indicative screening thresholds' of the online Planning Practice Guidance provides further assistance in determining whether significant effects are likely. Whilst none of the specific 'exclusion' thresholds detailed in this document are exceeded, reference is made to 'developments on a significantly greater scale than the previous use' having potential for significant effects.

Though the application site potentially exceeds this threshold, it does not automatically follow that EIA needs to be undertaken. As shown in Figure 1.2, the next stage of the screening process requires an additional examination to be carried out of whether the development is likely to have a significant effect on the environment.

The EIA Regulations establish the following criteria that must be taken into account in determining whether a scheme, which falls under the description of a Schedule 2 development, is likely to have significant effects. Schedule 3 of the EIA Regulations states that the following criteria should be accounted for when screening for a decision:



- J Characteristics of development;
- J Location of development; and
- J Characteristics of the potential impact.

## Preliminary Environmental Review

In reference to the section above an initial review of the potential impact areas and the associated significant effects has been undertaken with the findings provided below. The most sensitive impact areas are considered to be townscape, wind and overshadowing. These impact areas have also been reviewed against the requirement of the current EIA Regulations (see Appendix 1.0).

### Townscape, Visual and Built Heritage

The change in height and massing proposed by the development, together with the provision of new high-quality buildings, has the potential to change the existing townscape character and quality, in addition to views to, through and from the site.

By virtue of the design process itself and the careful attention that will be given to the design of the new buildings and the public realm, unacceptable impacts will be mitigated by the design team wherever possible as an integral part of the design development iterations. Therefore, no significant townscape, visual and built heritage impacts are anticipated.

A Heritage and Tall Building Assessment will be submitted with the application along with a Verified Wirelines document.

### Wind

The application site is not considered to be located within a particularly sensitive location with regards to wind with no immediately adjacent public open spaces.

A Wind Environment Assessment will be submitted with the application, and will include appropriate mitigation to minimise impacts on the pedestrian wind environment. If required, to reduce wind effects the studies will consider the massing and orientation of the proposed building, and where needed further mitigation measures such as horizontal canopies, vertical screening, landscape features, tree planting and side screening to balconies will also be considered to help reduce wind effects where necessary. Following the implementation of any necessary wind mitigation no significant wind environment effects are anticipated.

### Daylight/Sunlight and Overshadowing

The site has been identified by the local authority as an appropriate location for the implementation of a tall building. Therefore, whilst there is an existing baseline condition of relatively high levels of daylight and sunlight amenity in the surrounding residential properties for a dense urban context of this type, this is an unrealistic benchmark against which to consider any proposed development that comes close to realising the designated development potential of this site.

In this context, it is inevitable that the proposed development will incur adverse daylight and sunlight impacts that are beyond the typical BRE parameters for more simplistic daylight and sunlight assessments. In such circumstances, the BRE guidelines recommend that an alternative methodology is applied which focuses upon considering the levels of daylight and sunlight amenity that will be retained within the existing surrounding residential properties when the proposed development is in place, rather than the typical consideration of the relative change.

The design has been configured to ensure that sufficient daylight and sunlight amenity is preserved in the surrounding residential buildings with the proposed development in place and any effects will be



mitigated as far as possible. A comprehensive daylight and sunlight report will be provided in support of the planning application following the methodology outlined by the BRE Guidelines.

#### Traffic and Transportation

It is understood that current proposals include a low percentage of parking provision of 11 spaces (likely less once adjustments are made for disabled provision). The existing site provides circa 7 – 8 parking spaces and therefore in terms of trip generation, it is predicted that there would be a very low level of vehicle movements associated with the development. The site is also highly accessible by public transport with Bromley North station adjacent. Consequently, no significant traffic and transport related impacts are anticipated.

A Transport Assessment (TA), produced in line with relevant local and national guidance, will be submitted with the planning application.

#### Air Quality

The application site is situated within the regulatory area of London Borough of Bromley (LB Bromley). LB Bromley have declared an area encompassing the whole of the northwest corner of the borough as an Air Quality Management Area (AQMA) due to the potential exceedance of the Air Quality Strategy (AQS) objective for annual mean NO<sub>2</sub> concentrations.

As the proposed development will be introducing sensitive land use (residential) into an AQMA, it is likely that there will be mitigation required to reduce the exposure as discussed above. At this stage, the impact of the scheme on air quality as a result of traffic generated pollution and emissions from any energy plant is not yet known. Further mitigation may be required, this will be determined following the completion of detailed modelling of emissions. However, it is considered that following the implementation of suitable mitigation, no significant air quality impacts are anticipated.

An Air Quality Assessment Report will be submitted with the application.

#### Noise and Vibration

Following an early review of potential site conditions, it is anticipated that the site is likely to be primarily affected by road traffic noise arising from vehicles using the A21 Tweedy Road to the south of the site and to a lesser extent by road traffic on Sherman Road, with occasional contributions from railway traffic on the adjacent line; albeit at very slow speeds arriving at and departing the railway station.

On-site noise surveys are currently being undertaken. It is intended to undertake source noise measurements of the railway, at ground level, Sherman Road and the A21 to inform a 3-dimensional noise modelling exercise, in order to predict noise levels up the facades of the proposed development.

It is anticipated that noise and vibration impacts related to construction would be conditioned and that a Construction Environment Management Plan (CEMP) would be drawn up, post-planning, to ensure that acoustically sensitive receptors in the area are not affected. Mitigation would also be applied to the building envelope to ensure that any noise breakout from internal commercial elements is minimised to such an extent that the amenity of the surrounding area is not affected.

A Noise and Vibration Assessment Report will be submitted with application comprising predictions of facade incident noise levels, mitigation requirements and example mitigation techniques capable of meeting that requirement. Limits would also be set in accordance with BS4142:2014 for the off-site effects of any static plant or commercial activities proposed as a part of the scheme.

Following the implementation of suitable mitigation, no significant noise and vibration impacts are anticipated.



## Archaeology

There are no designated archaeological heritage assets within or in the vicinity of the study site. The site is not located in an archaeology priority area as defined on the Bromley UDP Proposals map. From the early research undertaken, it is considered that should archaeological remains prove to be present, it will be possible to implement suitable mitigation, and there will not be a significant archaeology impacts.

An Archaeological Desk Based Assessment will be produced and submitted with the planning application. This assessment will be undertaken in compliance with the Chartered Institute for Archaeologists Standards and Guidance for Historic Environment Desk Based Assessment (2014).

## Water Resources and Flood Risk

According to the Environment Agency's (EA) online mapping the site would appear to potentially sit within Flood Zone 1 and therefore has a 'low' probability of flooding. No significant impacts associated with the water resources and flood risk are therefore anticipated.

A Flood Risk Assessment will be completed and submitted with the planning application.

## Ground Conditions and Contamination

The bedrock is comprised of the Harwich Formation which consists of glauconitic silty or sandy clays, silts and fine – to coarse- grained glauconitic sands, some gravelly, varying to flint gravel beds. Some contamination may be present due to the adjacent railway. Furthermore, according to the Environment Agency's online mapping there are no recorded pollution incidents on the application site. Therefore, post mitigation, no significant ground condition and contamination impacts are therefore anticipated.

## Ecology

There are no statutorily designated sites within the site boundary or within the locality. The site would generally appear to be of low ecological value, although there may be some limited potential for protected species (primarily reptiles) to be present. Prior to the submission of the planning application an ecological site walkover and any necessary protected species surveys will be completed. The findings of these surveys and mitigation, should this be required, will be presented in an Ecological Assessment Report which will be submitted with the planning application.

It is considered that following the implementation of suitable mitigation there will not be a significant impact on the ecology at the site.

## Socio-economic

The construction and operational (commercial element to the scheme) phases may have beneficial effects through the provision of employment opportunities. However, the residential nature of the proposals will increase the demand on social infrastructure such schools and local medical facilities.

Child yield will be calculated in order to determine the level of impact and the required mitigation. This will likely be in the form of a financial contribution. Following the implementation of any required mitigation no significant socio-economic impacts are anticipated.

## Summary Environmental Review

In response to the points in Schedule 3 of the EIA regulations outlined above, and the potential environmental impacts resulting from the proposed development, the following should be noted:

- J Whilst the proposed development exceeds the exclusion and possibly the indicative threshold, the guidance clearly states that these thresholds 'should only be used in conjunction with the



general guidance on determining whether EIA and, in particular, the guidance on environmentally sensitive areas'. The guidance also states that 'it should not be presumed that developments above the indicative thresholds should always be subject to assessment'.

- J The application site is not located within an environmentally sensitive area as defined in the EIA Regulations and the nature and scale of the proposed development is not considered to result in any significant impacts.
- J The change in height and massing proposed by the development, together with the provision of new high quality buildings and public spaces, has the potential to change the existing townscape character and quality, in addition to views to, through and from the application site. By virtue of the design process itself and the careful attention that will be given to the design of the new buildings and the public realm, unacceptable impacts will be mitigated by the design team wherever possible as an integral part of the design development iterations.
- J The application site is not considered to be located within a particularly sensitive location with regards to wind with no immediately adjacent public open spaces. If required, mitigation would potentially include architectural features, such as canopies to deflect any down draughted winds and side screening to balconies to prevent winds flowing across.
- J Finally, the proposed development will not result in potentially hazardous environmental effects such as those that are more usually associated with industrial developments involving 'process' emissions or in areas of severely contaminated land. The potential for contamination is not considered to be sufficiently severe, complex or hazardous.

## Conclusions

Whilst the proposed development could be considered to fall within the description of a Schedule 2 Development under the EIA Regulations, it does not result in the potential for any significant environmental effects, either in isolation or in combination with other developments. As such, it is our professional opinion that a formal EIA is not required, as shown in Figure 1.2.

In the absence of a formal EIA being undertaken, our client will commission technical assessments that will identify possible minor environmental effects as a result of the proposed development. These reports will recommend measures to avoid, reduce or mitigate any identified potential impacts. These assessments will form part of the application submission. It is considered that the list of reports is likely to include the following, but the form of the actual application submission will be agreed in consultation with the planning authority:

- J Heritage and Tall Building Assessment;
- J Wind Assessment;
- J Transport Assessment;
- J Noise Assessment;
- J Air Quality Assessment;
- J Flood Risk Assessment;
- J Archaeological Desk Based Assessment; and
- J Ecological Assessment.

We trust that this letter provides you with reassurance that the environmental considerations associated with the application site and the proposed development are being properly and robustly assessed. Should you require any additional information to enable you to reach a screening decision, please do not hesitate to contact the undersigned. Otherwise, we look forward to receiving your Screening Opinion by 2<sup>nd</sup> November 2017, within the necessary 3-week period, as specified in the EIA Regulations and confirmation that your formal opinion will be entered on the public register.



Yours sincerely

James Bumphrey

Senior Consultant

For and on behalf of Greengage Environmental Ltd.

Appended.

Figure 1.1 Site Location Plan

Figure 1.2 EIA Screening Process

Appendix 1.0 Environmental Review





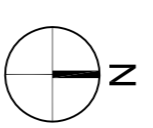
Figure 1.1 – Site Location



Contractors are not to scale dimensions from this drawing

Drawing Key

-  Application boundary
-  Ownership of paving to be determined



Revision	Date	Description
C	15.07.17	Site plan submitted to the Local Planning Authority
B	15.07.17	Site plan submitted to the Local Planning Authority
A	17.03.16	Site plan submitted to the Local Planning Authority

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Client  
**Be Living**  
 Project  
**6-10 Sherman Road  
 Bromley, London**  
 Description  
**Proposed Site Plan**

### INFORMATION

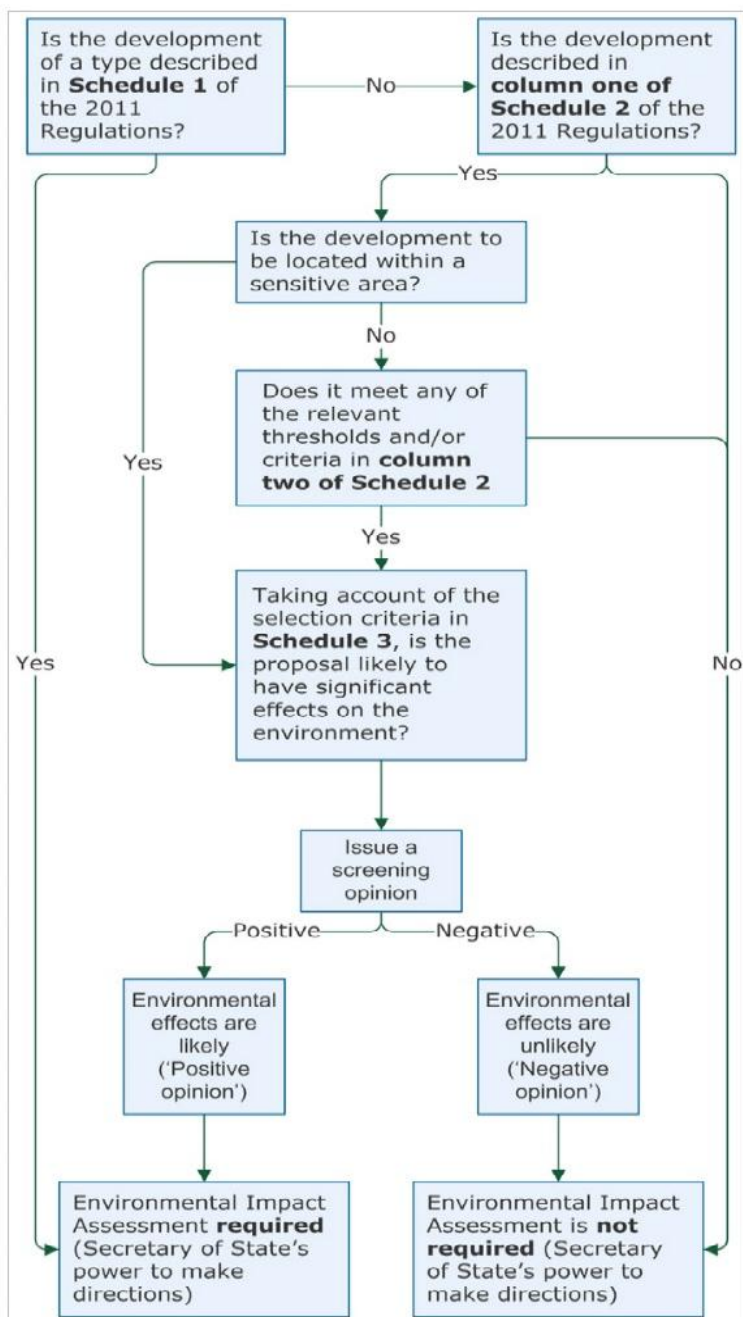
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 Job Number 31584  
 Drawing Number A-02-101  
 Drawn By AG  
 Checked By AG  
 Date July 17  
 Revision C

Original size 100mm @ A1 Copyright Broadway Malyan Limited





Figure 1.2 – EIA Screening Process





Appendix 1.0

Appendix 1.0 – Review Against 2017 EIA Regulations

Topic Area	Potential for Residues/ Emissions	Potential for Waste	Use of Natural Resources				Commentary
			Soil	Land	Water	Bio.	
Townscape, Visual and Built Heritage	N/A	N/A	N/A	N/A	N/A	N/A	<p>None of the topic areas specifically referenced within the 2017 EIA Regulations relate to Townscape Visual and Built Heritage.</p> <p>The change in height and massing proposed by the development, together with the provision of new high-quality buildings, has the potential to change the existing townscape character and quality, in addition to views to, through and from the site.</p> <p>By virtue of the design process itself and the careful attention that will be given to the design of the new buildings and the public realm, unacceptable impacts will be mitigated by the design team wherever possible as an integral part of the design development iterations. Therefore, no significant townscape, visual and built heritage impacts are anticipated.</p>
Wind	N/A	N/A	N/A	N/A	N/A	N/A	<p>None of the topic areas specifically referenced within the 2017 EIA Regulations relate to wind. The application site is not considered to be located within a particularly sensitive location with regards to wind with no immediately adjacent public open spaces.</p>

Daylight, Sunlight and Overshadowing	N/A	N/A	N/A	N/A	N/A	N/A	None of the topic areas specifically referenced within the 2017 EIA Regulations relate to daylight, sunlight and overshadowing. The design has been configured to ensure that sufficient daylight and sunlight amenity is preserved in the surrounding residential buildings with the proposed development in place and any effects will be mitigated as far as possible.
Transport	Minor temporary negative residual impact (Construction) Negligible residual impact (Operation)	N/A	N/A	N/A	N/A	N/A	<p>Construction</p> <p>There may be some minor temporary negative traffic effects associated with traffic generation during the construction period. Any impacts will be effectively managed through a Construction Environmental Management Plan (CEMP).</p> <p>Operation</p> <p>It is understood that current proposals include a low percentage of parking provision of 11 spaces (likely less once adjustments are made for disabled provision). The existing site provides circa 7 – 8 parking spaces and therefore in terms of trip generation, it is predicted that there would be a very low level of vehicle movements associated with the development. The site is also highly accessible by public transport with Bromley North station adjacent. Consequently, no significant traffic and transport related impacts are anticipated.</p>
Noise and	Minor temporary	N/A	N/A	N/A	N/A	N/A	Construction

Vibration	negative residual impact (Construction)						<p>There are likely to be minor short – term noise and vibration impacts associated with construction period. However, these are not considered significant and will be effectively controlled through the implementation of a CEMP.</p> <p>Operation</p> <p>There may be some minor noise generation associated with the proposed plant however, these will be designed in accordance with best practice guidance and significant effects not anticipated.</p>
Air Quality	Minor temporary negative residual impact (Construction)	N/A	N/A	N/A	N/A	N/A	<p>Construction</p> <p>There are likely to be minor short – term air quality impacts associated with construction period. However, these are not considered significant and will be effectively controlled through the implementation of a CEMP.</p> <p>Operation</p> <p>No significant impacts anticipated</p>
Ground Conditions & Contamination	N/A	Minor negative (Negligible Residual)	Minor negative (Negligible Residual)	Minor negative (Negligible Residual)	Minor negative (Negligible Residual)	N/A	<p>Construction</p> <p>There may be some potential for low levels of contamination associated with the adjacent railway. However, it is considered effective best practice mitigation measures can be implemented.</p> <p>Operation</p> <p>Following the implementation of mitigation at the construction stage</p>

							impacts are considered negligible.
Water Resources, Drainage & Flood Risk	N/A	N/A	Minor negative (Negligible Residual)	Minor negative (Negligible Residual)	Minor negative (Negligible Residual)	N/A	<p>Construction</p> <p>There are potential for impacts associated with low levels of contamination. However, there are no receptors likely to be affected and following the implementation of mitigation the impacts are considered negligible.</p> <p>Operation</p> <p>The proposals will be designed to incorporate water efficient design features. No significant impacts anticipated.</p>
Ecology	Minor temporary negative (Noise)	N/A	N/A	N/A	N/A	<p>Minor temporary (Noise)</p> <p>Long – term positive (ecological enhancements)</p>	<p>Construction</p> <p>There may be some low potential for protected species to be present. However, suitable protection measures can be implemented to mitigate this.</p> <p>Operation</p> <p>There is potential for the incorporation of ecological enhancements which will have the potential for minor long term positive effects for ecological receptors.</p>
Socio – economics	N/A	N/A	N/A	N/A	N/A	N/A	<p>Construction</p> <p>The construction phase will have positive minor temporary to negligible impacts, primarily through job creation.</p> <p>Operation</p> <p>The residential nature of the proposals will increase the demand on social</p>

							infrastructure such schools and local medical facilities. Mitigation will therefore likely be required in the form of a financial contribution.
Cumulative Impacts	Minor temporary negative	N/A	N/A	N/A	N/A	N/A	There is potential for minor temporary negative impacts during the construction stage. This is primarily associated with transport, noise and air quality impacts. These impacts will be controlled to an acceptable level through the implementation of a CEMP.