Planning Service

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Our ref: HGY/2016/0096
Contact: Robbie McNaugher
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Date: 21/03/2016

Dear Ms Horridge,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011

Location: **Land at Hale Wharf Ferry Lane, London, N17**

Proposal: **Request for a Scoping Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.**

Please find a Scoping Opinion in relation to the proposed development. Section 1 sets out the details of the application site and the proposal, Section 2, details the comments of the consultees and Section 3: Summary brings together the matters for which additional information will be required.

Yours sincerely

Emma Williamson
Head of Development Management
Planning Service

SECTION 1: Application Site and Proposal

The application site is located off the A503 Ferry Road at Tottenham Hale and comprises land bound by the River Lee Navigation Channel to the west and the River Lee Flood Relief Channel to the east. The application site measures approximately 1.80 hectares.

There are currently multiple light industrial units on the eastern part of the application site, including motor vehicle workshops, a waste transfer site, a pallet company and a wood joinery facility. At the southern end of the application site, there is an existing commercial office building, a restaurant and an electricity substation. Mooring of boats takes place along the western boundary, either on the bank or a jetty, which is accessible from the centre of the site. A footpath runs along the western boundary of the application site until it reaches the land occupied by the pallet company to the north. Temporary fencing separates the footpath from a series of car parking spaces used for either vehicles for repair associated with the motor vehicle workshops or porta cabins for the waste transfer site. The surface covering of the application site is predominantly hardstanding.

Road access is from the A503 Ferry Lane at the southern end of the application site. Public transport links include Tottenham Hale Station, approximately 300 m west, and bus stops on Ferry Lane opposite the application site. The southern part of the site has a high Public Transport Accessibility Level (PTAL) rating of 6A reducing to 5 to the north.

The application site is surrounded by the controlled waters of the River Lee Navigation Channel to the west and the River Lee Flood Relief Channel to the east, which form part of the Blue Ribbon network under the London Plan. In addition, the application site and its surrounding areas form part of the Lee Valley Regional Park. The Paddock, a Community Nature Park and area of Green Belt, is located to the east of the application site across the River Lee Flood Relief Channel. The Paddock and the River Lee channels to the east and west of the application site form part of a large composite Metropolitan
Site of Importance for Nature Conservation (SING). The associated areas to the SING also include Walthamstow Marshes and Reservoirs, located within approximately 15 m to the east of the application site across the flood relief channel from its closest point. These form part of the Lee Valley Special Protection Area (SPA), Ramsar site, Important Bird Area and Walthamstow Reservoirs Site of Special Scientific Interest (SSSI).

The area to the south of the application site is predominantly residential. The area to the west comprises industrial land and a number of recently developed residential blocks and areas under construction

The proposed development comprises a residential-led mixed use scheme, allowing for approximately 300sqm of commercial space and circa 500 residential units in a series of block buildings arranged along the waterfront, around a linear central open space. Mooring accommodation will continue be included for businesses along the River Lee Navigation Channel located on the western edge of the application site, along with an allocated landing area for the intended footbridge which will link the application site to the Hale Village to the west.

Building heights will range from four to 21 storeys, with accommodation blocks descending in stepped heights from the south at Ferry Lane, towards the northern end of the application site.

The application site is intended to have a single access route from Ferry Lane and to provide approximately 65 car parking spaces. Landscaping of central communal areas is also intended.

SECTION 2: CONSULTATION RESPONSES

During the scoping process, formal consultation occurred with the relevant statutory agencies and authorities and other relevant parties seen to have an interest in the future planning of the site and with relevant expertise and/or local knowledge in the environmental issue relevant to this site. A list of the consultees contacted and a summary of the responses to the EIA Scoping Report are detailed below in addition to those there has been further scrutiny of the scoping report that has raised additional points that should be considered set out in Section 3.

Internal

Transportation –

No comments.

Conservation Officer-

No comments.

EH Pollution-

The EIA scoping opinion will consider Air Quality and Contaminated Land. The following additional information has been omitted from and should be included in the EIA assessment:

Air Quality:

Whilst an air quality assessment is included, air quality neutral is not. The London Plan, Policy 7.14 requires developers to design schemes that are at least 'Air Quality Neutral'. The SPG 'Sustainable Design and Construction' (April 2014) provides guidance on air quality neutral and developments.

In addition, consideration must be given to the energy source, combustion plant and emissions.

Details of the chimney heights, diameters and locations will be required to be included in the EIA and considered at the design stage.

Control of Demolition and Construction Dust:

The GLA SPG 'Control of Dust and Emissions from Construction and Demolition' and requirements within this document must be considered within the EIA.

An asbestos survey of existing buildings prior to demolition should be carried out to identify the location and type of asbestos containing materials.

The contaminated land section is satisfactory; although I recommend ground gas monitoring is undertaken at both the development site and the adjacent site; known as The Paddock.

EH Noise-

No comments.

External

Crime Prevention Officer -

No comments received

The Environment Agency –

Having reviewed the document we generally agree with the proposed scope but would like to make the following comments under the following headings:
Chapter 6 Noise and Vibration
Chapter 7 Ecology
Chapter 9 External lighting
Chapter 10 Daylight, Sunlight and Overshadowing
Chapter 12 Ground Conditions and Contaminated Land
Chapter 14 Surface Water and Flood Risk
Water Framework Directive Assessment
The Local authority should be aware that we have had pre-application discussions with the applicant for this site.

Chapter 6 Noise and Vibration
Should any in channel works be required to the flood defence, the impacts of vibration on the aquatic environment should be assessed as a receptor within this section. We are pleased to see that this has been identified as a potential impact during construction in table 7.3.

Chapter 7 Ecology

Sites that are being re-developed adjacent to rivers should give greater space for the river and its corridor and seek enhancements to the river banks and channel. Providing this space through redevelopment can help to protect and restore floodplains, provide additional capacity for flood storage and conveyance, create a valuable riverside corridor and habitat, and increase access to the watercourses and opportunities for recreation. It will also assist in delivering the actions of the Thames RBMP and the Water Framework Directive.

The scheme should be designed with a naturalised buffer zone of 8 metres from the river Lee to ensure access for flood defence maintenance. These buffers should be planted with native species to enhance the ecological value of the river corridor. The applicant should consider setting back the existing flood defences into the site and provide soft engineered alternative to the hard flood wall. This approach is in line with the requirements of the River Basin Management Plan and Water Framework Directive

The constraints of site are acknowledged, however robust justification for not being able to achieve an 8m buffer would be required, together with mitigation/compensation including (but not limited to):

- Incorporation of suitable mitigation and enhancement measures (i.e. provide supporting evidence that the mitigation and enhancement provided is an improvement on the existing baseline).
- Assessment of related environmental effects under the EIA regulations;
- Assessment of the proposed development on the provisions of Water Framework Directive.

Chapter 9 External Lighting

We are pleased to see that the impacts of lighting on the aquatic habitat during construction and operation have been identified in tables 9.1 and 9.2.

Chapter 10 Daylight, Sunlight and Overshadowing

Tall buildings in close proximity to a watercourse can have a detrimental impact on the ecology by shading of the watercourse and encroachment onto the river corridor. Our advice is that tall buildings are set-back to minimise this impact. If this is not possible any impacts from shading or encroachment would have to be mitigated for either on the site or elsewhere.

We are pleased to see that impacts of over-shadowing on aquatic habitats caused by building presence has been included in table 7.4.

Chapter 12 Ground Conditions and Contamination

We are pleased to see that groundwater and contamination has been scoped into the Environmental Statement (ES).
The site is located in a Source Protection Zone 2 which should be identified as a receptor in this chapter.

We recommend that the requirements of the National Planning Policy Framework and National Planning Policy Guidance (NPPG) are followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be additional to the risk to human health that your Environmental Health Department will be looking at.

We expect reports and Risk Assessments to be prepared in line with our 'Groundwater protection: Principles and practice' document (commonly referred to as GP3) and CLR11 (Model Procedures for the Management of Land Contamination).
In order to protect groundwater quality from further deterioration:

- No infiltration based sustainable drainage systems should be constructed on land affected by contamination as contaminants can remobilise and cause groundwater pollution.
- Piling or any other foundation designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution.
- The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:
- From www.gov.uk:
    - Groundwater Protection: Principles and Practice (August 2013)
    - Our Technical Guidance Pages, which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency's Guiding Principles for Land Contamination) in the 'overarching documents' section
    - Use MCERTS accredited methods for testing contaminated soils at the site
- From the National Planning Practice Guidance:
    - Land affected by contamination
    - British Standards when investigating potentially contaminated sites and groundwater:

- BS 5930: 1999+A2:2010 Code of practice for site investigations
- BS 10175:2011 Code of practice for investigation of potentially contaminated sites
- BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points
- BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. The competent person would normally be expected to be a chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.

Chapter 14 Surface Water and Flood Risk

The site is located within Flood Zone 2 which is classified as having a high risk of flooding. In order for the development to be considered appropriate in this location a Sequential Test should be undertaken as detailed within the Planning Practice Guidance: Flood Risk and Costal Change. The Local Authority has undertaken a sequential test for allocated sites in the Tottenham Area Action Plan, which is currently being reviewed by the Environment Agency. The Local Authority should be satisfied that the proposed use is in line with the allocation for the purposes of satisfying the sequential test.

We agree that a Flood Risk Assessment (FRA) should be submitted with the EIA. We expect the FRA to contain a detailed assessment of all forms of flooding. Please see attached guidance note for preparing an FRA for a site in Flood Zone 2 in respect of fluvial flood risk. The FRA should also consider the flood defences which enclose the site and demonstrate that the structural stability will be commensurate with the lifetime of the development. The structural stability should also be included as a potential impact in table 14.2.

We disagree with the paragraph 14.2.8, which considers the site to be in FZ1. Applicants and their consultants/agents should note that it is incorrect to change a site's flood zone designation based on flood modelling that takes account of flood defences and climate change. The flood zones are intended as an indicative planning tool and are designated by the Environment Agency and the Local Planning Authority (in the case of Flood Zone 3b). The flood zones do not take the effects of climate change or flood defences into account.

While it is appropriate to carry out site specific assessments of the actual flood risk using the most detailed modelled information available, that does account for climate change and flood defences, the Flood Zone designations should not be changed based on this assessment. For instance, a site located within Flood Zone 3 will remain so, even if it has been shown not to be affected by the flooding during the 1 in 100 chance in any year flood event, taking the effects of climate change and flood defences into account.

Revised climate change allowances for peak river flow based on river basin districts are due to be published early 2016. These allowances will replace the current allowance for peak river flow which is 20%. The revised allowances are based on improved climate science and reflect the catchment characteristics within each river basin district. From the publication date we will be expecting applicants to factor the revised climate change allowances into their Flood Risk Assessments rather than the current 20% for peak river flow. If you have any further questions about this please contact us.

Water Framework Directive

Due to the nature of the proposed development and this sites proximity to the watercourse it is very likely that a WFD Assessment will be required. This should assess any potential impacts on the watercourses and demonstrate that the required enhancements will be delivered. Any development that has the potential to cause deterioration in classification under WFD or that precludes the recommended actions from being delivered in the future is likely to be considered unacceptable to us.

The Canal & River Trust

After due consideration of the submitted details, the Canal & River Trust has the following **comment** to make: In this case, you will be aware that the Canal & River Trust, in addition to being the landowner and navigation authority as well as a relevant statutory consultee, is also joint applicant on the application. As a consequence, we have been heavily engaged in the design process, and have no comments to make on the Scoping Opinion.

Natural England –

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EcIA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EcIA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.118 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g., designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2010. In addition
paragraph 118 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 61 of the Conservation of Habitats and Species Regulations 2010 an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant

effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)
The development site is very close to the following designated nature conservation site(s):

- Walthamstow Reservoirs SSSI, and Lee Valley SPA/Ramsar

- Further information on the SSSI and its special interest features can be found at www.magic.gov . The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within Walthamstow Reservoirs SSSI, and Lee Valley SPA/Ramsar and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

- Natura 2000 network site conservation objectives are available on our internet site http://publications.naturalengland.org.uk/category/6490068894089216

In this case the proposal is not directly connected with, or necessary to, the management of a European site. In our view it is likely that it will have a significant effect on an internationally designated site, specifically Lee Valley SPA/Ramsar, and therefore will require assessment under the Habitats Regulations. We recommend that there should be a separate section of the Environmental Statement to address impacts upon European and Ramsar sites entitled 'Information for Habitats Regulations Assessment'. As this site is designated for its bird interest, we advise that the issues this section of the ES should cover include the construction and operational impacts on lighting, noise and sight-lines and the potential recreational disturbance which may arise.

2.3 Regionally and Locally Important Sites

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2010
The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted standing advice for protected species which includes links to guidance on survey and mitigation.

2.5 Habitats and Species of Principal Importance

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication 'Guidance for Local Authorities on Implementing the Biodiversity Duty'.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration…in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g., from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g., whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

2.6 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

3. Designated Landscapes and Landscape Character

Landscape and visual impacts

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as

detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.
The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

Heritage Landscapes
You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm and further information can be found on Natural England's landscape pages here.

4. Access and Recreation
Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Rights of Way, Access land, Coastal access and National Trails
The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

5. Soil and Agricultural Land Quality

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 112 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF.

As identified in the NPPF new sites or extensions to new sites for peat extraction should not be granted permission by Local Planning Authorities or proposed in development plans.

6. Air Quality
Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

7. Climate Change Adaptation
The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 109), which should be demonstrated through the ES.

8. Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.
The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):
a. existing completed projects;
b. approved but uncompleted projects;
c. ongoing activities;
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e., projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Historic England –

On the basis of the information provided, we conclude that the proposal would lead to an application for which Historic England would be a statutory consultee. We do not engage with every proposal that affects the historic environment. Having considered the information provided, we have no comments to make in this instance. If, as the scheme develops, there are material changes to the proposals which would affect the historic environment, please consult us again.

It may be appropriate to seek the advice of the local planning authority and/or the relevant amenity societies on your proposals.

Thames Water

We would like to emphasise the importance of consultation with Thames Water at the earliest opportunity as water and waste water infrastructure is essential particularly for a development of this scale. The developer needs to consider the net increase in both water and waste water demand to serve the development and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided

We recognise that the document references ongoing consultation with Thames Water. A drainage strategy should form part of the supporting documentation with any applications and needs to include foul water drainage and needs to identify:

· What is required- Upsizing of pipes, provision of storage tanks

· When is it required – Any phasing associated with the delivery

· Where is it required - location plan and drawings of the solution

· Which delivery route will the developer take - will they deliver it, will Thames Water deliver it, will it be jointly delivered, are agreements in place

Equally, given the scale of development it may also be necessary for the developer to fund an impact study of the existing water supply infrastructure to identify whether there is capacity to serve the proposed development.
It is also unclear as to how buildings & structures will be constructed, Thames Water is concerned that water mains and sewers immediately adjacent to the site may be affected by vibration as a result of piling, possibly leading to water main bursts and or sewer collapses.

We therefore strongly recommend that the scoping opinion report and/or supporting documents to the planning applications should also include the following.

- The developments demand for water supply and network infrastructure both on and off site and can it be met
- The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met
- Build – out/ phasing details to ensure infrastructure can be delivered ahead of occupation

- Any piling methodology and will it adversely affect neighbouring utility services.

TfL

TfL has prepared its own Transport Assessment best practice guidance to assist developers in scoping out the environmental and transport impacts, each scheme should be assessed on its own merits through pre-application advice, but the guidance is a good starting point and should be referred to in the EIA scoping report, details can be found here: http://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance

The EIA must include a multi-modal impact assessment including baseline and future car, bus, pedestrian and cycle trips and the overall mode share.

The implications of construction traffic on the Strategic Road Network (SRN) will need to be agreed with TfL, the EIA will need to assess the worst case peak hour impact and include any peaks and troughs throughout the life of the development. The impact of construction vehicles on buses, pedestrians and cyclists must also be considered. A Construction Logistics Plan will be required to supplement the EIA.

Any site specific mitigation measures relating to TfL infrastructure and services must be secured by either s106 or s278 agreement. Planning conditions may be requested if appropriate and TfL may request that it is consulted prior to discharge of a condition.

The Mayor of London introduced his Community Infrastructure Levy (CIL) on 1 April 2012. Most development that receives planning permission after this date will be liable to pay this CIL. Further details can be found at: http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy. The rate for Haringey is £35 per square metre.

National Grid

No written reply to the scoping opinion has been received

Greater London Authority

No written reply to the scoping opinion has been received

Section 3: Summary and Conclusion

Scope of the EIA

The proposed scoping would appear to cover the majority of the issues that the Council would require to be included within an Environmental Statement (ES). Other issues needing to be more fully addressed have also been identified and specific comments are detailed below. The comments of the Environment Agency and Natural England in particular should be addressed within the ES.

Environmental Wind

It is noted that Computational Fluid Dynamics analysis (CFD) is proposed to simulate wind microclimate conditions in and around the site. This will analyse a set of wind directions to establish the frequency of averaged wind speeds. The Council considers this to insufficient to assess the impact on surrounding comfort and safety and require fully transient CFD modelling and wind tunnel testing to be satisfied that the proposal will not cause any discomfort or safety issues due to gusts.