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Director of Placemaking and Housing

London Borough of Haringey

Civic Centre

High Road

Wood Green

N22 8LE

FAO: Philip Elliot - philip.elliott@haringey.gov.uk

Date: 2 November 2022

Our ref: 64605/01/BK/NM/25930243v5

Dear Sir,

The Town and Country Planning (Environmental Impact Assessment regulations 2017 (as updated))

Berol Quarter, Ashley Road, Tottenham Hale, N17 9LJ

On behalf of our client, Berkeley Quarter Limited ('the Applicant'), we request that London Borough of Haringey ('the Council' or 'LBH') provides a formal screening opinion to confirm if an Environmental Impact Assessment ('EIA') is required in respect of the erection of a mixed-use commercial and residential development across 2 Berol Yard and Berol House (the 'Proposed Development'), comprising the 'Berol Quarter' at Ashley Road in Tottenham Hale (the "Site"). This request is made in pursuance of Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as updated) ('the 2017 EIA Regulations').

This submission meets the requirements of Regulation 6(2) of the 2017 EIA Regulations, as set out in Table 1 below.

Table 1 Screening Opinion Submission Requirements in accordance with Regulation 6(2) of the 2017 EIA Regulations

Regulation 6(2) requirements	Conformity
A plan sufficient to identify the land	Yes
A description of the development, including in particular:- i) A description of the physical characteristics of the development and, where relevant, of demolition works; ii) A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected	Yes
A description of the aspects of the environment likely to be significantly affected by the development	Yes
To the extent the information is available, a description of any likely significant effects of the Proposed Development on the environment resulting from:-	Yes

Regulation 6(2) requirements	Conformity
i) the expected residues and emissions and the production of waste, where relevant; and ii) the use of natural resources, in particular soil, land, water and biodiversity	
Such other information or representations as the person making the request may wish to provide or make, including any features of the Proposed Development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.	Yes

To enable your consideration of this issue, we set out below the following information:

- Description of the Site and its surroundings;
- Description of the Proposed Development; and
- Review of the requirement for an EIA.

Item 3 is dealt with by reviewing the Site and its surroundings and a consideration of the issues set out in the 2017 EIA Regulations.

This request for a Screening Opinion is accompanied by the Site Plan (drawing 22049_07_002) at Annex 1.

To summarise, we consider that the Proposed Development will not give rise to a need for EIA. We outline below the analysis undertaken to reach this conclusion.

1. Background

The Site is located within the southeast of the Ashley Road South Masterplan ('ARSM') Regeneration Area of Tottenham Hale, in the administrative jurisdiction of LBH and within Site Allocation TH6 of the Haringey Local Plan: Site Allocations DPD (adopted 24th July 2017), and the Tottenham Hale Tall Building and Growth Area (GA1 and BH2). The ARSM is covered by a wider set of urban design and regeneration principles developed within the District Centre Framework ('DCF') surrounding the Station Interchange.

As part of the ARSM regeneration plans, the Site's planning history includes a hybrid scheme granted on 8 June 2018 (ref: HGY/2017/2044) for the demolition of existing buildings at 1 Berol Yard and 2 Berol Yard and erection of two buildings including education and residential use of up to eight and 14 storeys high (planned to be of academic use), and outline proposals (all matters reserved) for the alteration or conversion to mixed-use residential and commercial use of Berol House.

This hybrid application was accompanied by a full Environmental Statement ('ES') dated June 2017. The EIA included assessment of proposals at Berol House and 2 Berol Yard and assessed the technical aspects listed below.

- | | |
|--|---------------------------------------|
| - Townscape and Visual Impact | - Air Quality |
| - Transportation | - Noise and Vibration |
| - Daylight, Sunlight and Overshadowing | - Ground Conditions and Contamination |
| - Socio-Economic Effects | - Water Environment and Flood Risk |
| - Built Heritage | - Ecology and Nature Conservation |
| - Environmental Wind | - Cumulative Assessment |

The conclusions of the ES held that a range of mitigation measures were identified as being largely capable of being enforced across the Berol Yard development. Negative residual effects in relation to townscape and visual impact, noise and heritage, and during operation to daylight and sunlight, were concluded to be outweighed by beneficial socio-economic and transport effects without the need for additional mitigation measures. With a view to the wider development of the Tottenham Hale area, the ES identified positive cumulative effects on townscape and visual impact, transport, ecology and socio-economics when assessed cumulatively against surrounding schemes.

Reserved Matters were approved in March 2020 (ref: HGY/2020/0080). The hybrid scheme has been partially constructed with 'Building 4' occupied in 2021. Berol House and the education site (which had been intended to be occupied by Ada, National College of Digital Skills) has not been progressed; the proposed operator of the college building Ada was unable to finance and deliver the project and has now pulled out of the contract to deliver the project.

2. Description of the Site and its Surroundings

The 1.2ha 'L' shape of the Site encompasses both Berol House and 2 Berol Yard. Berol House comprises a three-storey brick building of several serviced offices. It is Locally Listed and was formerly the Eagle Pencil Works, dating to the 19th century. Berol House lies along Ashley Road which provides access at the western boundary of the Site, and a delivery and servicing access route to the 'Cannon Factory' (industrial and leisure uses, non-designated heritage asset) forms the northmost boundary of the Site at the top of Berol House.

2 Berol Yard was previously occupied by low, single storey industrial warehouse units. These have now been demolished and the site is being used for storage of construction materials and car parking. The site is bound by construction hoardings.

The residential component at 1 Berol Yard (now known as The Gessner) has been occupied since 2021 and forms the northeast boundary of the Site at 14 storeys. The Site is bound to the south by development at 1 Ashley Road, of a maximum of approximately 20 storeys, which itself is bound by the southeast to north curvature of Watermead Way (A1055) and the new Millstream Tower at 21 storeys. The A1055's north to south orientation forms the eastern boundary of the Site and beyond this Hale Village providing new residential and student accommodation, commercial and retail uses with a maximum height of 32 storeys. Down Lane Park, a local playing field, is located to the northeast.

Other heritage assets in proximity to the Site include terraced houses on Hale Road, approximately 150m southwest; 62 High Cross Road and Tottenham High Cross approximately 600m southwest of the Site; the Pumping Station at Markfield approximately 900m south from the Site, and The Ferry Boat Inn approximately 700m east of the Site, (all Grade II listed). Conservation areas surrounding the A10 from Tottenham High Road to Page Green are a minimum of 650m east.

The Site is currently accessed from the south end of Ashley Road between Burdock Road and the A1055. The A1055 connects to Waltham cross and the M25 motorway, and with the A10 providing direct access to Whitechapel in East London. Transportation links in this location are of a PTAL rating 5-6a (most accessible), with Tottenham Hale Rail and Underground Station and Bus Station less than 200m from the southeast of the Site.

An Air Quality Management Area ('AQMA') applies across the borough. The Site lies within Flood Zone 2 (medium probability of flooding) on the Environment Agency ('EA') Flood Map for Planning, with identified long term risk of flooding from the Walthamstow Reservoirs, which are Ramsar sites and Sites of Special Scientific Interest ('SSSI').

3. Description of the Proposed Development

The Proposed Development will comprise a mixed-use commercial and residential scheme across 2 Berol Yard and Berol House. It will complement recent and emerging neighbouring developments in Tottenham Hale and will complete the ARSM.

Proposals for Berol House comprise the refurbishment of the building's existing 3,800sqm of commercial floorspace at its ground to upper floors, and an additional 2,200sqm of Class E accommodation and landscaped amenity at roof level instead of the 18 maisonettes previously permitted. The roof level extension will comprise three new storeys (the consented scheme included two new storeys). Energy will be provided via Air Source Heat Pumps and will be rated BREEAM Very Good.

Proposals for 2 Berol Yard comprises 210 new Build-to-Rent homes with a mix of Class E and Class F accommodation of up to 840sqm across the ground and first floors up to approximately 30 storeys. Up to 35% of residential units are to be of Discounted Market Rent by Habitable Room distributed throughout the development and up to 10% are to be accessible or adaptable units, with up to 3% accessible parking plus up to 12 spaces for use by existing tenants of Berol House.

Cycle Parking is to be provided to the GLA's London Plan standards, including allowances for oversized bikes in both buildings. All servicing will utilise the existing access via Ashely Road or the A1055 as per the original planning approval. Public realm improvements linking the completed schemes to the north of Berol Yard and through to Ashley Road are planned to allow for east-west movement.

A detailed planning application will be submitted in respect of the Proposed Development.

4. Requirement for EIA

The development is one for which the EIA Regulations applies, as it is considered that the Proposed Development falls within Schedule 2 of the Regulations, meaning a development other than exempt development of a description mentioned in column 1 of the table in Schedule 2 where:

- any part of that development is to be carried out in a sensitive area; or
- any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development.

In terms of (a), the Site is not in or partly in a sensitive area as defined by regulation 2(1) of the Regulations, but it does exceed the criterion referred to in (b) in that the development falls within Part 13(b) of the Schedule as a change to or extension of development of a description listed in paragraphs 1 to 12 of column 1 of Schedule 2 of the Regulations, where that development is already authorised, executed or in the process of being executed and the development as changed or extended may have significant adverse effects on the environment. The Proposed Development also falls within Part 10(b) of Schedule 2 of the Regulations which relates to schemes including more than 150 dwellings.

For Schedule 2 developments, the Regulations require that an EIA be undertaken where “*the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location*”.

In determining whether the development is likely to give rise to significant environmental effects, reference should be made to the selection criterion set out in Schedule 3 of the Regulations:-

- **Characteristics of the development** (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, risk of accidents and risk to human health);
- **Location of the development** (by reference to the environmental sensitivity of the area); and
- **Types and characteristics of the potential impact** (having regard in particular to the extent of the impact, its transfrontier nature, magnitude and complexity, probability and duration, frequency and reversibility).

Each of these issues are considered further below.

Development Characteristics

Size and design of the development

The Site currently comprises Berol House, a three storey and approximately 100m long brick 19c building, and 2 Berol Yard which is presently vacant following previous demolitions. The Proposed Development is expected to rise up to c.30 storeys, an increase of c.20 storeys above the previously consented scheme (refs. HGY/2017/2044; HGY/2020/0080). However, considering the similar surrounding heights of the ARSM in the Tottenham Hale Tall Building and Growth Area (GA1 and BH2) that the Proposed Development is expected to complete as a landmark with high quality materials and architecture, it is considered that this height is unlikely to give rise to significant adverse environmental effects in relation to its size or design that would give rise to the need for EIA on the grounds of Visual Impact and could contribute positively to the townscape of the District Centre.

Cumulation with other development

The Tottenham Hale area is subject to a number of redevelopment projects at this time of a similar scale and land use to that proposed at Berol Yard. Services and other improvements are being brought forward by each development to ensure that cumulative effects are therefore unlikely to generate significant adverse effects. Considered in the context of the hybrid permission which the Proposed Development will replace; and the adjoining uses; the outcomes of the ES for the hybrid permission are unlikely to be materially affected such that new significant effects are considered likely. Therefore, it is not considered that any unusual or significant effects would arise when the Proposed Development is considered cumulatively with other schemes' land uses nearby that would give rise to a need for EIA.

Use of natural resources, in particular, soil, land, water, biodiversity

Connections between Down Lane Park and the Lee Valley as contribution to the Green Grid by the Proposed Development positively benefits the route by providing active frontages along its length with a continuity of the landscaping quality of the larger Berol Yard consented scheme's public realm (refs. HGY/2017/2044 and HGY/2020/0080); this is unaffected as a result of the Proposed Development. Materials are to be high quality and durable. The proposals do not make use of natural resources nor

deplete those present on the Site in a way which would have the potential to give rise to significant environmental effects requiring EIA.

Production of waste

The construction and operational phases of the Proposed Development will generate waste, however it is not expected to be at a level that will give rise to significant adverse impacts on the environment due to the nature of the proposals, and management plans including a Construction Management Plan ('CMP') which will include detail on the management of waste. During operation, residential and commercial uses will be provided with suitable waste facilities in line with policy.

Risk of major accidents and/or disasters

The Proposed Development is not considered likely to give rise to the potential for risks from accidents which would give rise to the need for EIA. Access by and operation of HGVs to the Site is not expected to generate hazardous activity or loads during construction or operation and will be managed through a CMP including detail on sustainable construction travel planning with due regard to the residential local context of the Site.

The Site is deemed to be of medium probability of flooding, to be managed through Sustainable Drainage Systems ('SuDS'), with consideration to risk stemming from the Walthamstow Reservoirs, so that the proposals do not increase flood risk on-site or elsewhere; nor alter the outcomes of the ES for the hybrid consented scheme in relation to flood risk.

Pollution and nuisances

During construction, traffic, dust, or other emissions and risk of groundwater contamination will be managed through standard best practice construction measures considered to be embedded. Minimal parking is proposed with a view to encourage sustainable travel modes and reduce emissions. Potential for significant noise and vibration for surrounding residential receptors from construction are expected to be mitigated and managed via a CMP, following best practicable means of noise control, such that it should not give rise to the need for EIA.

Risk to human health

There is considered to be a low level of risk to human health (for example, due to water contamination or air pollution) as a consequence of the Proposed Development as noted above. The Health Impact Assessment ('HIA') prepared in support of the consented scheme (ref. HGY/2017/2044) identified that the proposals will have a long-term, permanent minor positive impact on new residents and the general public through the provision of high-quality, well-designed housing and commercial floorspace which this scheme seeks to build upon. This conclusion is not changed when the Proposed Development is considered against the outcomes of the ES for the hybrid consented scheme. Thus, impacts giving rise to the need for EIA are not anticipated.

Environmentally Sensitive Location

The Site is not in, nor partly in a 'sensitive area' as defined by Regulation 2 (1) of the EIA Regulations. The Walthamstow Reservoirs (Ramsar, SSSI) lie 0.5km east of the site however they are considered disconnected and unlikely to experience significant effects from the Proposed Development.

Environmental Effects

The PPG provides a template of an EIA Screening Checklist, and states (PPG Doc Ref: ID 4-018-20170728):

“While there is no requirement to use a screening checklist, they can help to ensure that the relevant issues are considered and provide a clear audit trail.”

Therefore, to assist consideration of the issues associated with the Proposed Development site, and in addition to the commentary above, we provide below a completed version of the EIA Screening Checklist to assist the Council in forming its EIA Screening Opinion in respect of the Proposed Development.

Table 2 Completed EIA Screening Checklist (<https://www.gov.uk/government/publications/environmental-impact-assessment-screening-checklist>)

CASE DETAILS			
Applicant	Berol Quarter Limited	Brief description of the project / development	Redevelopment comprising a mixed-use commercial and residential scheme across 2 Berol Yard and Berol House.
LPA	London Borough of Haringey		
EIA DETAILS			
Is the project Schedule 1 development according to Schedule 1 of the EIA Regulations?			No
If YES, which description of development (THEN GO TO Q4)			N/A
Is the project Schedule 2 development under the EIA Regulations?			Yes
If YES, under which description of development in Column 1 and Column 2?			10(b)(ii) and 13(b)
Is the development within, partly within, or near a ‘sensitive area’ as defined by Regulation 2 of the EIA Regulations?			No
If YES, which area?			N/A
Are the applicable thresholds/criteria in Column 2 exceeded/met?			Yes
If yes, which applicable threshold/criteria?			Development of more than 150 dwellings; relationship to a wider development previously subject to EIA.

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (only if Yes in part 2a) - Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
	Briefly explain answer to Part 2a and, if applicable and/or known, include name of feature and proximity to site (If answer in Part 2a / 2b is 'No', the answer to Part 3a / 3b is 'N/A')		Is a significant effect likely, having regard particularly to the magnitude and spatial extent (including population size affected), nature, intensity and complexity, probability, expected onset, duration, frequency and reversibility of the impact and the possibility to effectively reduce the impact? If the finding of no significant effect is reliant on specific features or measures of the project envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment these should be identified in bold.	
NATURAL RESOURCES				
Will construction, operation or decommissioning of the project involve actions which will cause physical changes in the topography of the area?	No	No changes to the topography of the area are anticipated as a result of this development	No	N/A
Will construction or operation of the project use natural resources above or below ground such as land, soil, water, materials, minerals or energy which are non-renewable or in short supply?	Yes	While the development will not make use of on-site natural resources above or below ground, as the site consists of Berol House and brownfield land, in a worst case-scenario some limited materials and resources used during the construction and operation of the development may be from non-renewable or recyclable sources.	No	The materials used during construction of the development are to be of a high quality and be durable in reflection of the architecture of Berol House. Energy will be provided via Air Source Heat Pumps rated BREEAM Very Good and the development is expected to exceed BREEAM 'Very Good' ratings. An Energy Statement is to be submitted alongside the application. It is not expected that the Proposed Development will cause any materially unacceptable effects regarding daylight and sunlight or overshadowing on neighbouring properties or Down Lane Park, and Daylight, Sunlight and Overshadowing Assessment and Internal Daylight Assessment

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)	(Part 3a) / (Part 3b) (only if Yes in part 2a) - Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)
		will be submitted alongside the planning application. Mitigation measures including a waste strategy as part of a CMP, covering circular economy principles, in addition to an energy strategy are to be covered within the planning application to ensure that, as expected, significant effects on non-renewable resources or those in short supply are not anticipated.
Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, e.g. forestry, agriculture, water/coastal, fisheries, minerals?	No The Site is a brownfield site consisting in its majority of buildings, including Berol House, and hardstanding. The surrounds of the Site are of the same quality and the local green space at Down Lane Park to the northeast of the Site is not expected to experience any significant adverse effects which would give rise to the need for EIA.	No N/A
WASTE		
Will the project produce solid wastes during construction or operation or decommissioning?	Yes Waste will be generated during the demolition and construction of the development and during its operation.	No Production of a Waste Management Plan in conjunction with or as part of a CMP will provide protocols for working with supplies for the reduction of waste in packaging and in selection of materials. During operation, suitable waste recycling facilities will be made available in accordance with policy with collections twice weekly and a Sustainable Waste Management Plan and Waste and Water Utilities Assessment are to be submitted alongside the application. Significant effects are therefore not anticipated.

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?)) or N/A)	(Part 3a) / (Part 3b) (only if Yes in part 2a) - Is a Significant Effect Likely? (Yes/No or Not Known (?)) or N/A)
POLLUTION AND NUISANCES		
Will the project release pollutants or any hazardous, toxic or noxious substances to air?	No The conclusions of the ES submitted alongside the consented scheme (ref: HGY/2017/2044) held that there is no significant risk for contaminants or pollutants which could cause an effect of significance which would give rise to the need for EIA, as they will be managed through standard best practice construction measures. An Air Quality Assessment is to be submitted alongside the application that will confirm that these principles will be retained as embedded mitigation with the Proposed Development.	No N/A
Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	Yes The construction phase of the Proposed Development will include periods of time, particularly during the foundation works phases, for noise and vibration effects which could impact local residential receptors.	No Potential for significant noise and vibration for surrounding residential receptors from construction will be mitigated and managed via a CMP, following best practicable means of noise control, and significant effects are therefore considered unlikely. This will be described in a Noise Impact Assessment submitted with the application..
Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	Yes Risk of leaching of ground contaminants to controlled waters surrounding the Site has been identified during the construction and operational phases of the Proposed Development.	No Mitigation measures in order to address this risk will ensure that construction will follow best practice measures, including the removal of contaminated soil and barriers at sources of contaminants; appropriate risk assessments will establish the most effective approach to ensuring that the Site is in a

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)	(Part 3a) / (Part 3b) (only if Yes in part 2a) - Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)
		suitable condition for the Proposed Development. No significant effects are considered likely.
Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	No No areas in close proximity to the Site are known to exceed legal environmental standards which would be affected by the project.	No N/A
POPULATION AND HUMAN HEALTH		
Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?	No No anticipated risks of major accidents are anticipated. Flood risk on the Site is expected to be mitigated through measures embedded into the Proposed Development.	No N/A
Will the project present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning? (for example due to water contamination or air pollution)	No There are no likely risks to current neighbours, future site users, or on underground services infrastructure as a result of the Proposed Development's construction or operational phases. Appropriate construction management will be ensured so that impacts on the local population's health are not significant.	No N/A
WATER RESOURCES		
Are there any water resources including surface waters, e.g. rivers, lakes/ponds, coastal or	Yes The Site is in an area of medium probability of flooding as it lies within Flood Zone 2 on EA Flood	No Risk of flooding is to be managed through SuDS and an Outline Drainage Strategy embedded into the design of the Proposed

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)	(Part 3a) / (Part 3b) (only if Yes in part 2a) - Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)
underground waters on or around the location which could be affected by the project, particularly in terms of their volume and flood risk?	Map for Planning, with identified long term risk of flooding from the Walthamstow Reservoirs, which are Ramsar sites and SSSI.	Development at the operational phase. These will be detailed within a full Flood Risk Assessment. During construction, a CMP is expected to include local flood prevention measures which comply with relevant policy and guidance and informed by surveys and investigations of the Site. Thus no significant effects on flood risk on- or off-site are likely.
BIODIVERSITY (SPECIES AND HABITATS)		
Are there any protected areas which are designated or classified for their terrestrial, avian and marine ecological value, or any non-designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the project? (e.g. wetlands, watercourses or other water-bodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. (Where designated indicate level of designation (international, national, regional or local))).	No The Berol Yard and Berol House areas of the Site are predominantly comprised of hardstanding and buildings, which provide limited ecological value. It is considered that the SSSI Ramsar Walthamstow Reservoirs are of a sufficient distance from the site that it is unlikely to experience significant effects.	No N/A
Could any protected, important or sensitive species of flora or fauna which use areas on or around the Site, e.g. for breeding, nesting, foraging, resting, over-	Yes It is considered that in a worst-case scenario the Site could be part of the area which is identified in the ES as suitable for use by nesting birds in the ARSM, including habitat for up to	No The Proposed Development includes landscaping measures which will improve the Site's ecological quality and increased biodiversity of floral species with connection to the Green Grid. Mitigation measures for the

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?)) or N/A)	(Part 3a) / (Part 3b) (only if Yes in part 2a) - Is a Significant Effect Likely? (Yes/No or Not Known (?)) or N/A)
wintering, or migration, be affected by the project?	one breeding pair of black redstart.	replacement and enhancement of habitat for nesting birds, with specific provisions for black redstarts are to be embedded into the design of the ARSM for the long-term protection of the species in accordance with applicable legislation and planning policy. It is therefore considered that the proposals are unlikely to give rise to significant environmental effects.
CULTURAL HERITAGE/ARCHAEOLOGY		
Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the location which could be affected by the project? Where designated indicate level of designation (international, national, regional or local).	Yes Berol House is a Locally Listed Building: formerly the Eagle Pencil Works dating to the 19 th century. Heritage assets in proximity to the Site include: The Cannon Factory (non-designated heritage asset); terraced houses on Hale Road; 62 High Cross Road and Tottenham High Cross; the Pumping Station at Markfield; and The Ferry Boat Inn (all Grade II listed). There are also five Conservation Areas within the zone around the A10 from Tottenham High Road to Page Green.	No During construction, measures including a photographic record of the Cannon Factory adjacent to the Site will be undertaken to ensure the preservation of its limited architectural and historical significance and after completion made publicly available. For the protection of other heritage assets, hoarding and measures to control for traffic, dust and noise will ensure that impacts are maintained at non-significant levels. Berol House is to be retained and the design of new additions to the building are to remain subservient to its existing design, materials, and massing. A Heritage Statement and Townscape and Visual Impact Assessment and Tall Building Statement will be submitted alongside the application which will set out this information. It is not expected that effects would arise which would give rise to likely significant effects.
Is the project in a location where it is likely to be highly visible to many	Yes The A1055 and the wider ARSM and Hale Village developments bound the	No The development is the completing part of the ARSM and the previously consented scheme

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?)) or N/A)	(Part 3a) / (Part 3b) (only if Yes in part 2a) - Is a Significant Effect Likely? (Yes/No or Not Known (?)) or N/A)
people? (If so, from where, what direction, and what distance?)	Site. Further afield the surrounding area is largely low-rise residential with some mixed light industrial use.	(ref. HGY/2017/2044), as a high-quality landmark building of a comparable scale to other tall buildings within the Growth Area. Therefore, it is not expected that the Proposed Development will give rise to likely significant effects when considered in context with the general development activity in the area.
TRANSPORT AND ACCESS		
Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	Yes The Site is bound by the following routes used by the public: The A1055 (Watermead Way); Ashley Road with Down Lane Park to the northwest of the Site. The Proposed Development will create greater west to east permeability between these two roads by opening up Berol Yard.	No Protocols for minimising traffic disruption during the construction of the Proposed Development will be included in a CMP. During operation, access by HGVs and other good vehicles will be appropriately managed with a Transport Assessment informed Travel Plan also in place to encourage sustainable travel modes. Down Lane Park is expected to be unaffected. No significant effects are considered likely.
Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	Yes The A1055 may be susceptible to congestion. It is not expected that the Proposed Development would cause congestion on rail and underground services at surrounding stations.	Key aspects of the CMP which will mitigate the effects of construction traffic to minimise the likelihood of congestion with strict monitoring and control of all vehicles entering and existing the site will include the setting of specific working hours and delivery times and a system of authorisation when visiting the site in vehicles, while safely maintaining pedestrian access around the Site perimeter during the construction phase. During operation a Travel Plan will be implemented to encourage sustainable travel patterns. Therefore, no significant effects are considered likely.

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?)) or N/A)	(Part 3a) / (Part 3b) (only if Yes in part 2a) - Is a Significant Effect Likely? (Yes/No or Not Known (?)) or N/A)
LAND USE		
Are there existing land uses or community facilities on or around the location which could be affected by the project? e.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation.	Yes Berol House contains a number of serviced offices. The Site is situated within the ARSM and adjacent to the Hale Village mixed use developments with a large proportion of residential development.	No The Proposed Development is expected to generate employment through the construction phase and commercial uses at the operational phase through improved provision of employment space. It has been agreed with the Council that the previously planned academic use of 2 Berol House is no longer possible, and therefore now focuses on delivering a mix of new workspace and retail accommodation at Berol House, alongside a new mixed use building accommodating Build to Rent homes and up to 35% affordable housing, alongside commercial/retail space. These effects will give rise to beneficial effects but not at a level giving rise to an need for EIA.
Are there any plans for future land uses on or around the location which could be affected by the project?	No While the Site's development would result in significant change at the immediate urban scale around the District Centre of Tottenham Hale, the proposed land use is included as part of the ARSM strategic plans for land use in this location.	No N/A
LAND STABILITY AND CLIMATE		
Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g. temperature inversions, fogs, severe winds, which could cause the project to	No Not in a known area of risk.	No N/A

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (only if Yes in part 2a) - Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
present environmental problems?				
CUMULATIVE EFFECTS				
Could this project together with existing and/or approved development result in cumulation of impacts together during the construction/operation phase?	No	Cumulative effects are not expected to give rise to any likely significant adverse effects during both the construction and operational phases of the development.	No	N/A
TRANSBOUNDARY EFFECTS				
Is the project likely to lead to transboundary effects?	No	No effects are likely.	No	N/A

Planning Submission

Notwithstanding your consideration of the requirement for EIA in connection with the Proposed Development, additional material will accompany the application to assist in your consideration of the proposals. The material will include:

- Application and CIL forms;
- Drawing Pack of Plans;
- Planning Statement
- Geo-Located 3D Massing Model in fbx file format;
- Design and Access Statement (including Crime Prevention & Accessibility statement);
- Retail Strategy Report;
- Heritage Statement;
- Waste and Water Utilities Assessment;
- Flood Risk Assessment;
- Outline Drainage Strategy;
- Energy Statement;
- Transport Assessment (including draft Travel Plan, and Delivery and Servicing Plans);
- Parking Design and Management Plan;
- Daylight, Sunlight and Overshadowing Assessment;

- Internal Daylight Assessment;
- Air Quality Assessment;
- Noise Impact Assessment;
- Townscape and Visual Impact Assessment and Tall Buildings Statement;
- Sustainable Waste Management Plan;
- Statement of Community Engagement;
- Wind Impact Assessment;
- Fire Safety Report & general functional safety;
- Landscape Report (including Urban Greening Factor Assessment);
- Circular Economy Statement; and
- Construction Management Plan.

5. Conclusion

Our analysis of environmental conditions at the Site has concluded that there are no likely significant environmental effects which will give rise to the need for EIA in association with the Proposed Development. The previously consented hybrid application was submitted with a supporting ES which concluded that the Site was not at risk of significant adverse environmental impacts following the enforcement of appropriate mitigation measures which are expected to be carried forward into the Proposed Development. The increased height of the Proposed Development from that of the previously consented scheme is not considered to have significant adverse effects which would give rise to the need for EIA when considered against the conclusion that the Site is unlikely to experience other environmental effects.

We trust that you have sufficient information to determine whether this is an EIA development under the Town and County Planning (Environmental Impact Assessment) Regulations 2017 (as updated). From these Regulations, we note that the local authority has three weeks (beginning from the date of receipt) to form a screening opinion and to provide the main reasons for this opinion having regard to the relevant criteria listed in Schedule 3. If adopting a negative screening opinion, we note that the LPA must also state any features of the Proposed Development and measures envisaged to avoid and prevent what might have otherwise been, significant adverse effects on the environment.

Please contact me or my colleague Nicki Mablesen if you have any questions, or alternatively Jonathan Hoban at this office, with whom you have been liaising during pre-application engagement.

Yours faithfully,



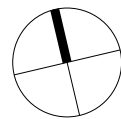
Emily Clarke
Planner



Annex 1: Site Plan (drawing no. 22049_07_002)



REV			DATE	DESCRIPTION	CMD	REV			DATE	DESCRIPTION	CMD
XX	XX			FOR PLANNING	AJD						



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2 BEROL YARD
SITE PLAN
SITE
22049_07_002

31.10.2022
WORK IN PROGRESS

XX
Revision

SCALE 1:500 @A1 1:1000 @A3