

By Email: david.joyce@haringey.gov.uk
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: 25 November 2022
Our ref: 64605/01/BK/EC/26036299v2
Your ref:

Dear Sir

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

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

We write on behalf of our client, Berkeley Quarter Limited ('the Applicant'), following our meeting on 18th November 2022 to discuss our request of London Borough of Haringey ('the Council' or 'LBH') to provide a formal screening opinion to confirm if an Environmental Impact Assessment ('EIA') is required for the Proposed Development of the 'Berol Quarter' at Ashley Road. This letter provides further information to assist the Council covering Land Use, Cultural Heritage, Biodiversity and the potential for Cumulative Effects.

Land Use

As outlined in the Screening Letter, it has been established that there is no prospect of the National College of Digital Skills or an alternative higher educational facility being delivered at the Site. Consequently, the Proposed Development includes an additional 3,040sqm of Class E accommodation across Berol House and 2 Berol Yard, made viable by up to 210 Build-to-Rent homes, 35% of which will be Discount Market Rent ('DMR') affordable housing (by habitable room). The Proposed Development's provision for mixed commercial uses and public space, balanced with affordable residential homes, makes a key contribution to the ARSM, creating a better sense of place, permeability and connection to Ashley Road, and a platform for local independent businesses. Existing serviced offices in Berol House will be refurbished to exemplar quality and design. These beneficial effects are meaningful, and complete the ARSM masterplan, however they are not considered to be of such significance as to give rise to the need for EIA.

Cultural Heritage

As a result of an iterative design process, the Proposed Development preserves visibility and connectivity to Berol House's long east-facing elevation, and materially echoes its historic architectural context. Moreover, the renovation of Berol House seeks to preserve and enhance the local distinctiveness of the building and surrounding

assets such as the Cannon Factory. Further heritage assets identified in the Screening Letter are considered suitably distant from the Proposed Development so as not to experience significant adverse effects which would give rise to the need for EIA. Whilst it is not material to the screening process, a Heritage Impact Assessment ('HIA') will be submitted with the application for the Proposed Development which will describe these effects in detail.

Biodiversity (Species and Habitats)

The Site lies just outside of the Zone of Influence ('ZOI') of the Epping Forest Special Area of Conservation ('the SAC'), which is circa 6,190 metres from the SAC boundary (to its closest point). The Interim Mitigation Strategy for Epping Forest SAC (October 2018) sets out mitigation and monitoring strategies against likely significant effects. LB Haringey is not listed in that document as a "Competent Local Authority", nor a Local Authority where great pressure in terms of biodiversity from which rising visitor numbers would originate. It is stated that visitors arising from non-listed boroughs "*are significantly less and, for the main part, visit on a less frequent basis*" and in fact "*93% of all visitors within the entire ZOE actually live within 3km*" of the SAC. We would therefore conclude that there is unlikely to be a significant effect from the Proposed Development that could give rise to a need for EIA.

In addition, it is considered that proposed connections between the Proposed Development and the Green Grid between Down Lane Park and the Lea Valley would provide closer opportunities for recreation should users of the Proposed Development seek facilities of this nature.

Cumulative Effects and Summary

The Proposed Development when considered alongside other existing and/or approved development identified in **Annex 1** of this letter, is not expected to give rise to likely significant cumulative effects during either the construction or operational periods.

As with each of the developments in the ARSM, the Proposed Development provides services and improvements including space for private and public amenity, play, and for independent local businesses. These will cater to new residents and commercial users of Berol House and 2 Berol Yard, in addition to existing and future residents of the wider area. No significant adverse cumulative effects are therefore expected on the availability or provision of services from the Proposed Development that could give rise to the need for EIA.

Throughout the pre-application and iterative design process, the impact of 2 Berol Yard's height has been carefully considered in relation to the surrounding townscape and views. The Site is located within an area identified as being suitable for tall buildings. 2 Berol Yard is likely to be visible to travellers on the A1055 and users of the wider ARSM and Hale Village Developments (see **Annex 1**), as well as the surrounding residential area. However, it will be viewed in the context of the existing high rise residential uses at Gessner and 1 Ashley Road. The addition of this additional development will not give rise to significant cumulative effects from long, medium or short range views.

The Proposed Development is expected to complete the ARSM as a landmark building, consolidating the cluster of tall buildings in Tottenham Hale with high quality materials. The building has been developed with wind and microclimate, daylight and sunlight, noise and air quality impacts mitigated as far as possible through measures considered embedded into the design. As significant effects are

unlikely from the Proposed Development in isolation, there is therefore no potential for likely significant adverse environmental effects giving rise to a need for EIA.

We trust that this additional information provides sufficient detail to determine whether this is an EIA development under the Town and County Planning (Environmental Impact Assessment) Regulations 2017 (as updated). 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

Copy

Annex 1: Table of Cumulative Schemes

Table 1 Schemes Identified for Cumulative Assessment

Ref	Address	Ref: Number	Type of Application	Current Known Status	Height (m AOD)	Total no Units	Non-Residential Floorspace (sqm)
1	Cannon Factory and Ashley House	HGY/2016/4165 Reserved matters: HGY/2018/2353	Outline	Approved 02/05/2018 Reserved matters: 14/11/2018	Building 2- 23.175 (4 storeys) Building 2a- 38.85 (6-7 storeys) Building 3 - 63.275 (up to 17 storeys)	256	Flexible A1/A3/B1/D1 uses: 3,171 Maximum of 450 to be A1 and 300 to be A3 to control uses (set out in S106).
2	Ashely Gardens	HGY/2017/2045 Amended: HGY/2019/2804 (S73) and HGY/2021/1170 (S96A)	Full	Approved 08/06/2018 S73: 02/04/2020 S96A: 10/08/2021	44.45 (10 storeys)	417	A1/A3/B1/D1: 1,170
3	Ashely Park	HGY/2019/0108 Appeal: APP/Y5420/W/19/ 3232707	Full	Refused 10/04/2019 Appeal allowed 16/04/2020	28.275 (Part 6, part 8 storeys)	97	Flexible A1/A2/B1:132
4	The Gessner (1 Berol Yard)	HGY/2017/2044 Reserved matters: HGY/2020/0080	Hybrid	Approved 08/06/2018	56.725 (14 storeys)	184	A1/A3/B1: up to 4,100 D1: 7,275
5	One Station Square	HGY/2016/3932	Full	Approved 10/08/2017	82.25 (22 storeys)	128	A1/A3 use: 434
6	Hale Wharf	HGY/2016/1719	Hybrid	Approved 12/06/2017	81.125 (21 storeys) - tallest element	505	A1/A2/A3/A4/A5: 370 B1: approximately 1,100 (subject to market testing)
7	Hale Village (SW Plot)	HGY/2017/2005	Full	Approved 02/05/2018	119.6 (33 storeys) - tallest element	279	A1/A3/A4/B1/D1: 1,588

Ref	Address	Ref: Number	Type of Application	Current Known Status	Height (m AOD)	Total no Units	Non-Residential Floorspace (sqm)
8	Monument Way	HGY/2016/2184 Reserved matters: HGY/2018/0050	Outline	Approved 21/12/2017 Reserved matters: 16/03/2018	29.42 (5 storeys)	54	Nil
9	Strategic Development Partnership	HGY/2018/2223	Full	Approved 27/03/2019	138.35 (38 storeys) 56.30 (14 Storeys) 71.6 (19 storeys) 75.325 (19 storeys) 60.4 (15 storeys) 60.9 (16 storeys)	1036	Flexible commercial space: 4,335– 5137 (Depending on inclusion of cinema) D1 (health centre): 1,643
10	Ashely Road Depot	HGY/2022/0752	Full	Approved 31/8/2022	45.7 (13 storeys)	272	E: 174
11	The Hale	HGY/2021/2304	Full	To be determined	87.5(24 storeys)	189	Sui Generis: 14,729
Total						3417	35,648