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Email: calum.macqueen@quod.com
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By Email

Dear Robbie,

Ref: HGY/2018/2223: Environmental Impact Assessment (EIA) Further Information Note

This Further Information Note (FIN) has been prepared on behalf of TH Ferry Island Nominee 1 Limited and TH Ferry Island Nominee 2 Limited ('Applicant') and accompanies an application seeking Non-Material Amendments (NMA) to the Tottenham Hale Centre development planning permission (Ref: HGY/2018/2223). Planning permission for the Tottenham Hale Centre development was approved by the London Borough of Haringey ('LB Haringey') in March 2019 for a residential led mixed use development in Tottenham Hale ('Development').

The Development relates to the redevelopment of five plots of land (known as Welbourne, North Island, Ferry Island, Ashley Road East and Ashley Road West) in Tottenham Hale, totalling approximately 2.25 hectares. The five plots are collectively referred to as the 'Site'.

The NMA application seeks approval for non-material amendments to Plot B (Ferry Island – Buildings 1 and 2) via the revision of drawings listed within Condition 2 of the planning permission.

The design of the buildings within Plot B has been reviewed as part of the detailed design process. A summary of the main amendments ('Amendments') relevant to the EIA process are provided below within the 'Proposed Amendments' section. A full list of Amendments is provided within the Design Report prepared by Allford Hall Monaghan Morris Architects (AHMM), dated April 2023.



1 Planning and EIA Background

The Development was subject to an EIA process under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017¹. The planning application was accompanied by an Environmental Statement (ES) dated July 2018 (the 'July 2018 ES') and an ES Addendum dated October 2018 (the 'ES Addendum'). The July 2018 ES and ES Addendum are hereafter referred to as the 'Submitted ES'.

Non-Material Amendments

Seven NMA applications have been approved pursuant to planning permission HGY/2018/2223 as detailed within Table 1.1 below.

Table 1: Non-Material Amendments Approved pursuant to the Development.

Application	Description
HGY/2019/2934	Non-material amendments to the Welbourne Plot (Plot C) for changes to the internal layout of the building, including the layout of residential units, as well as changes to the boundary landscaping, windows and other minor changes. The approved non-material amendments also included changes to the wording of Conditions A13, B13, C13, D13 and E13.
HGY/2020/1075	Non-material amendments to Plot E (Ashley Road East) including changes to the internal layout of the building; refuse arrangements; communal entrance; alignment of northern façade; window positions; balconies; terraces and roof equipment.
HGY/2020/1076	Non-material amendments to Plot A (North Island) including changes to the internal layout and external appearance of the building.
HGY/2020/1194	Non-material amendments to Plot D (Ashley Road West) including internal and external alterations to the building and changes to the unit mix. The approved amendments also included an amendment to the description of development for the Tottenham Hale Centre development planning permission to reflect a proposed increase (by 84 sq.m GIA) to the total floorspace. The amended description of development allows up to 104,137 sqm GIA of floorspace to be provided across the development.
HGY/2021/1149	Non-material amendments to Plot D (Ashley Road West). The approved amendments comprised external design modifications to the balconies, window guarding and cladding panels.

¹ Her Majesty's Stationary Office (HMSO) (2017). The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Stationary Office. May 2017.



Application	Description
HGY/2021/1661	Non-material amendments to Plot A (North Island) and Plot B (Ferry Island). The proposed amendments comprised minor internal and external design modifications including landscaping changes in respect to Buildings 2 and 3 and resulted in a minor reduction in the gross internal area of both buildings. An additional 3-bedroom dwelling was also introduced within Building 2.
HGY/2022/0631	Non-Material Amendments in relation to Plot B (Ferry Island site). The proposed amendments related to minor internal and external design changes to Buildings 1 and 2 and resulted in the provision of an additional dwelling within Building 1. Non-material amendments were also proposed to the site-wide landscaping scheme.
HGY/2022/1103	Non-Material Amendments to Plot C (Welbourne site) of the Tottenham Hale Centre development planning permission (ref. HGY/2018/2223) dated 27 March 2019. The proposed amendments relate to minor external design associated with the ground floor health centre use including: addition of louvres on the northern and southern elevations of the building; replacement of five glazed panes with louvres on the internal courtyard elevation; minor relocation of a window panel on the building's eastern elevation; provision of an additional entrance to the health centre along Plot C's Park View Road frontage; and minor amendments to the substation and plant room doors on the western elevation of 'Block A'.
HGY/2022/2484	Non-Material Amendments in respect to Plot E (Ashley Road East site) of the Tottenham Hale Centre development Planning Permission (ref: HGY/2018/2223) dated 27 March 2019. The amendment seeks to introduce a leisure use (Use Class D2) to the approved land uses for the flexible use non-residential unit at ground floor level of the building.
HGY/2022/2581	Non-material amendment following a grant of planning permission HGY/2018/2223 for the provision of ground floor plant enclosure and external louvres to 3 windows

NMA Ref. No. HGY/2020/1194 secured approval for amendments to the description of development to increase the overall floorspace by 84 sqm GIA. As a result, the NMA changed the overall floorspace in the description of development from 104,053sqm to 104,137sqm GIA. NMA Ref. No. HGY/2022/0631 secured approval for a minor alteration to the approved Ferry Island dwelling mix, including the provision of one additional apartment within Building 1. The increase in one residential unit (taking the total number of units proposed to 1,032) remains within the originally tested and approved 1,036 residential units within the Submitted ES. These amendments are reflected within the description of development shown below within the 'The Development' section.



It should be noted that none of the seven NMAs have had a material effect on the findings of the Submitted ES, and each NMA was supported by a Further Information Note prepared by Quod, barring HGY/2021/1149 which did not require a Further Information Note due to the very minor external amendments to balconies, window guarding and cladding panels on Plot D (Ashley Road West).

2 Approach to the Further Information Review

The Amendments were considered in the context of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017² (as amended)^{3,4} (the 'EIA Regulations') and the Submitted ES. This review ascertained whether any new or materially different significant environmental effects are expected as a result of the Amendments and whether any further environmental information needs to be provided in respect of the Amendments, in line with the EIA Regulations.

The review involved the following:

- Review of baseline conditions, legislation, policy and guidance since the submission of the Development;
- Review of the Amendments to the Development;
- Assessment of whether the environmental effects described in the Submitted ES remain valid for decision making in light of the Amendments; and,
- Review of committed developments considered within the cumulative assessment.

Only those topics that were assessed within the Submitted ES were reviewed within this FIN. It is assumed that all mitigation measures which the Submitted ES relied upon are carried through and implemented accordingly unless otherwise stated. Where any changes to mitigation measures are deemed necessary this is stated in the relevant technical section.

Baseline, Legislation, Policy and Guidance Review

There have been no material changes to the surrounding prevailing baseline environment since submission of the Submitted ES other than works commencing on the Berol Yard Ashley Road development (Ref: HGY/2017/2044) to the north of the Site. A detailed cumulative assessment was

² Her Majesty's Stationary Office (HMSO) (2017). The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Stationary Office. May 2017.

³ HMSO, 2018. The Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2018. The Stationary Office. October 2018.

⁴ HMSO, 2020. The Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England)(Coronavirus) (Amendment) Regulations 2020. The Stationary Office. May 2020.



carried out within the Submitted ES, which included the Berol Yard Ashley Road development within the assessment.

Construction works have been completed on Plot D (Ashley Road West) and Plot E (Ashley Road East), with practical completion due imminently on Plot A (North Island). Demolition and construction works have commenced on the Plot C (Welbourne), with demolition works on Plot B (Ferry Island) having been completed and all existing structures removed in accordance with the approved planning permission.

While construction is underway on the Berol Yard Ashley Road development and Plot C (Welbourne) of the Site, it has been assumed for the purposes of this review that the prevailing environmental conditions at the Site remain as reported within the Submitted ES. This assumption has been made to ensure that the consideration of the Amendments to the Development and their environmental effects remains a 'worst-case' assessment and is directly comparable to the findings of the Submitted ES. In making this assumption, the above has no material implications for the Submitted ES and the baseline studies within the Submitted ES are considered to remain valid.

A review of relevant legislation, policy and guidance across the topics was undertaken and it is considered that there are no significant changes to legislation or policy that would change the findings of the Submitted ES.

The London Plan 2021 – Spatial Development Strategy for Greater London⁵ was published by the Mayor of London in March 2021. The policy changes it introduces are not considered to materially affect the findings of the Submitted ES.

The Development

The Development is defined as:

“Demolition works and clearance of existing site to provide a mixed-use development comprising 6 buildings up to 38 storeys in height, which together with pavilion and basement accommodation will provide up to 104,137m² of floorspace (GIA), comprising residential (Use Class C3) (up to 1,036 units), retail (Use Class A1-A4), health centre (Use Class D1), office (Use Class B1), leisure (Use Class D2) parking and servicing areas, hard and soft landscaping (including the provision of a new public square), highways works, creation of new vehicular accesses and the realignment of Station Road, decentralised energy network works and other associated works.”

⁵ Greater London Authority, 2021. The London Plan - Spatial Development Strategy for Greater London.



Proposed Amendments

Full details of the proposed Amendments to the Development are set out in the Design Report that accompanies the NMA application prepared by AHMM. In summary, the proposed Amendments to the Ferry Island – Building 1 and 2 that are relevant to the Submitted ES are:

Ferry Island – Building 1

- Minor reconfiguration of the basement layout relating to stair doors, waste stores and risers.
- Minor reconfiguration to ground floor relating to additional fire escape, door and riser positions, cycle stair locations and lift arrangements.
- Minor reduction in retail floorspace at ground floor (-10sqm).
- Second stair added at upper levels alongside changes to the position of risers and additional doors.

Ferry Island – Building 2

- Minor Reduction in residential floorspace (-34sqm).
- Inclusion of a second fire escape stair between ground floor and upper levels;
- Additional fire escape provided at ground floor for egress from the second staircase;
- Minor reconfiguration of back of house arrangement to respond to the introduction of the second stair at ground level;
- Rationalisation of layout of the 1 bed apartment on Level 1 to 6 adjacent to the second staircase;
- Minor reconfiguration of communal corridors to comply with the latest fire strategy at upper levels;
- On Level 7 the line of the façade to access the terrace has been updated to allow the communal corridor to extend and provide access to the adjacent 1 bed apartment;
- A projecting balcony has been added between to compensate for loss of recessed balcony on Level 7 to 11;
- The 2 bed apartment layout has been revised to respond to the revised stair arrangement on Level 8 to 11;
- The 1 bed apartment layout has been revised to respond to the revised stair arrangement on Level 08 to 11;
- Minor amendments to façade around the 1bed and 2 bed apartment to respond to the updated apartment layouts on Level 08 to 12;
- The 1 bed and 2 bed apartments have switched location to enable the second stair to be accommodated on level 12;



- Updated roof plan to capture the rotation of the stair on the lower floors on Level 1; and,
- Refined access to the main stair directly to the stair from the entrance lobby.

Summary

The Amendments will not change the number of residential units proposed within the Building 1 and 2 of the Ferry Island Plot, nor will the proposed footprint, massing, or heights of Building 1 and 2 be affected.

3 Review of Construction Assessment Findings

For all topics, the **construction effects** presented within the Submitted ES are considered to remain valid. The Amendments would not alter the timescales or scale of works previously assumed in the Submitted ES. Therefore, the Amendments would not give rise to any significant effects not previously identified or change the level of effect reported in the Submitted ES. Construction effects are therefore not reviewed further.

4 Review of Assessment Findings: Ferry Island – Building 1

For all topics, the Amendments are not considered to be substantive to the extent that they would materially affect the likely significant environmental effects for the completed Development reported within the Submitted ES. The effects presented within the Submitted ES are therefore considered to remain valid.

5 Review of Competed Development Assessment Findings: Ferry Island – Building 2

Socio-Economics

All the data used in the socio-economic assessment, the findings and conclusions of the Submitted ES remain valid. Therefore, no changes to the Submitted ES are required. The Amendments do not result in a change to the housing tenure mix and the quantum of residential units remain as approved at 1,032 units (approved under NMA Ref. No. HGY/2022/0631) and therefore there would be no material effect to the effects reported in the Submitted ES as a result of the completed Development.

There would be no noticeable effect on the assessments of Housing Delivery, Additional Spending and demand for Social Infrastructure (i.e. Education, Healthcare and Open Space and Playspace) from the Development contained within the Submitted ES. In addition, the minor reduction in flexible commercial floorspace would not have a significant effect on the assessment of Job Creation from the Development contained within the Submitted ES.

Transport

All environmental effects in relation to operational traffic identified in the Submitted ES and Transport Assessment remain valid. Therefore, no changes to the Submitted ES are required. The trip generation assessment in the Submitted ES was based on 104,249sqm of floorspace (inclusive of non-residential land use) and 1,041 residential units. The planning permission for the Development



approves up to 104,137sqm of GIA floorspace. Given that a higher quantum of development was assessed, and residential unit numbers would be below the 1,041 units assessed (i.e. 1,032), the original analysis within the Submitted ES is considered a worst case and robust analysis in terms of trip generation.

Air Quality

Given that the transport assessment remains valid, it follows that the traffic flows used in the Air Quality assessment also remain valid and the conclusions of the Submitted ES remain valid. Therefore, no changes to the Submitted ES are required.

The Submitted ES assessed the effects of the Development associated with road traffic emissions during the completed and occupied Development. Potential effects associated with the energy centres were also assessed. The transport assessment within the Submitted ES considered a higher quantum of development than the amended scheme. Therefore, the effects relating to the trip generation and resultant traffic emissions associated with the Development remain valid. In addition, the Amendments would not affect the proposed energy centre requirements.

Noise and Vibration

The results and conclusions of the noise and vibration assessment as presented within the Submitted ES remain valid. No changes to the Submitted ES are required. The Amendments would not alter the assessment of noise affects presented in the Submitted ES as no change is predicted for traffic levels from the Development and the uses of the buildings would not change.

The mitigation measures outlined in the Submitted ES would be implemented as agreed, such as plant noise and sound attenuation details being subject to control under planning conditions (planning conditions 12 and 13).

Ground Conditions and Contamination

The results and conclusions of the ground conditions and contamination assessment of the Submitted ES remain valid. Therefore, no changes to the Submitted ES are required. The ground conditions and contamination assessment of the Submitted ES focused on the risk of contamination at the Site and how construction of the Development could potentially affect future residents and natural resources.

The land use of the Development has not been altered by the Amendments. Risks from land contamination and remediation would be addressed through conditions which require details to be submitted to and approved by LB Haringey prior to works commencing.

Daylight, Sunlight and Overshadowing

The Amendments do not affect the ES chapter and the findings and conclusions of the Submitted ES remain valid. Therefore, no changes to the Submitted ES are required. The Amendments do not result in any material change in the footprint, orientation, massing or heights of the building located on the



Site. The minor adjustments to the façade and balconies are non-substantive and is not considered to have a material effect on the daylight, sunlight and overshadowing of surrounding residential and amenity spaces.

Wind Microclimate

It is not considered that the Amendments would give rise to any new or materially different impacts on the assessment of wind within the Submitted ES and, as such, the findings and conclusions of the Submitted ES remain valid. Therefore, no changes to the Submitted ES are required. The Amendments do not result in any material change in the footprint, orientation, massing or heights of buildings that would affect the pedestrian wind environment or the potential for occasional strong winds to be generated by the Development.

The introduction of projecting balcony to compensate for loss of recessed balcony on Level 7 to 11 would not affect the pedestrian wind environment, the potential for occasional strong winds to be generated by the Development nor are would they have a material effect on the wind environment of the balconies and the terrace. In addition, previous testing undertaken for the Submitted ES shows locations on the building (receptor locations 315 and 316, Figure 13.27 of Chapter 13: Wind) are expected to be suitable for sitting use in the summer season, which is the desired wind condition. Further testing undertaken by Wirth Research in April 2021 in relation to NMA HGY/2021/1661, confirms that the conditions are consistent with the target conditions achieved in the Submitted ES on balconies on Building 2. The change from recessed balcony to projecting balcony is not considered to affect suitable for sitting and standing in summer conditions on these balconies, and thus wind effects at this location would be suitable for their intend use.

Townscape and Visual Impact

It is not considered that the Amendments would give rise to any new or materially different impacts on the assessment of townscape and visual impacts, and, as such, the findings and conclusions of Submitted ES remain valid. Therefore, no changes to the Townscape and Visual Impact Assessment (TVIA) – Volume II are required. The Amendments do not result in any material change in the layout, orientation, massing or heights of buildings that would affect the visual impact of the scheme thereby impacting townscape character.

In addition, the changes proposed to the façade and balconies not materially alter the appearance of the Development.

6 Cumulative Scheme Review

Detailed cumulative assessments were provided within the technical chapters of the Submitted ES. A review of planning applications submitted and approved since March 2019 was undertaken to establish if other cumulative schemes have come forward since submission of the planning application. Following a data search of the LB Haringey planning portal using the search criteria



identified in ES Chapter 3: EIA Methodology of the Submitted ES, no new relevant cumulative schemes were identified.

The Amendments to the Development do not alter the findings of the cumulative assessment and there are no new cumulative schemes identified. Therefore, the Submitted ES remains valid with regard to cumulative effects.

7 Conclusions

This review has confirmed that there are no new or materially different significant environmental effects expected as a result of the Amendments and no further environmental information needs to be provided in respect of the Amendments, in line with the EIA Regulations. We consider that the Submitted ES remains valid for decision making and no further environmental information is required.

Yours sincerely

Calum MacQueen
Associate Director

cc. Matthew Sherwood - Quod
 Mark Swinburne - Argent