



Appendix 2.1

INFORMAL SCOPING NOTE



EIA Informal Scoping Note

Northumberland Development Project – Section 73 Application

1 Introduction

- 1.1 We write with reference to Tottenham Hotspur Football and Athletic Co. Ltd ('Applicant') forthcoming Section 73 (S.73) application for the consented Northumberland Development Project (NDP). The London Borough of Haringey ('LB Haringey') granted hybrid planning permission on 15 April 2016 (ref. HGY/2015/3000, as amended¹) ('Operative Permission'). This Operative Permission gave full planning permission for Plot 1 (The Stadium), Plot 2 (The Tottenham Experience) and Plot 3 (Hotel) and outline planning permission for Plot 4 (The Extreme Sports Building), Plot 5 (The Residential Buildings and Flexible B1/D1 Space) and Plot 6 (The Community Health Building) ('Consented Scheme').
- 1.2 The purpose of this Note is to invite the London Borough of Haringey's ('LB Haringey') **informal** views on the proposed scope, approach and level of detail of the Environmental Statement ('ES') Addendum which will be undertaken for the project.
- 1.3 The S.73 application amends the entire Site boundary (i.e. the 'Site'), although the design changes relate only to the extent that comprises Plot 3 ('Plot 3 Site'). The proposed amendments are described in Section 4.
- 1.4 The Applicant has voluntarily committed to undertaking an ES Addendum which will be carried out in-line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017² (as amended³) ('EIA Regulations'). We are **not seeking a formal scoping opinion** under Regulation 15 of the EIA Regulations; therefore, LB Haringey is not required to consult with statutory bodies.
- 1.5 This informal Scoping Note is accompanied by the following appendices:
- Appendix 1: Figures;
 - Appendix 2: Planning History Summary;
 - Appendix 3: Cumulative Schemes; and
 - Appendix 4: Townscape Character Areas Plan and Proposed Viewpoint Plan.

2 Site and Setting

- 2.1 The Site comprises the Tottenham Hotspur Football Stadium, wholly within the administrative boundary of LB Haringey at Bill Nicholson Way, 748 High Road, London, N17 0AP.
- 2.2 The Site extends to approximately 8.97 hectares and is bound by Lilywhite House to the north; High Road (A1010) to the west, Worcester Avenue to the east, and Park Lane to the south.

¹ By HGY/2017/1183, HGY/2021/1039, HGY/2022/4504 and HGY/2021/1043.

² HMSO, (2017). The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Stationary Office.

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



- 2.3 Plot 1 (The Stadium) and Plot 2 (The Tottenham Experience) have been built out in the north of the Site and are operational.
- 2.4 The Plot 3 Site is located in the south-western portion of the Site.. A Site Location Plan is presented in Figure 1, Appendix 1. The Plot 3 Site comprises a temporary podium associated with the stadium, public realm and temporary structures.
- 2.5 All the streets surrounding the Site are accessible to pedestrians and have footpaths on both sides with a number of crossing facilities. On the High Road, the pedestrian crossing facilities are focused at the junctions with Northumberland Park, White Hart Lane and Park Lane with additional facilities along the street and on Northumberland Park and Park Lane further from the Site. The Public Transport Accessibility Level (PTAL) for the Site, which is a theoretical measure of the accessibility within London, ranges from 3 (moderate accessibility) to 5 (good accessibility).

3 Background and Planning Context

- 3.1 The planning application for the Operative Permission was supported by an ES dated September 2015 ('2015 ES'). The 2015 ES was prepared in accordance with the 2015 EIA Regulations⁴.
- 3.2 The Consented Scheme comprises planning permission for development Plots 1, 2 and 3 in detail, with Plots 4, 5 and 6 in outline with matters of appearance, scale and landscaping reserved. This permission granted redevelopment of the stadium with associated uses. For Plot 3, this granted permission for construction of a hotel of up to 100m in height, with provision for 180 hotel rooms and 49 residential units.
- 3.3 As mentioned previously, Plots 1 and 2 are complete and operational. Reserved matters consent was granted for the scale of Plot 4⁵ and the appearance of Plots 6⁶. A reserved matter application is pending approval for Plot 5 landscaping⁷.

4 Proposed Development

- 4.1 The Applicant intends to submit a S.73 application to amend the Operative Permission in relation to Plot 3 of the Consented Scheme only for the proposed development. These amendments are proposed primarily to meet new building regulations, including fire safety requirements. In summary, these changes ('Amendments') comprise:
 - Changes to the Plot 3 building form and layout;
 - An increase of approximately 17m in height taking the Plot 3 building to approximately 117m; and
 - An increase in the floorspace quantum of communal areas without any changes to the maximum permitted number of hotel bedrooms (180) or residential units (49) in the hotel.
- 4.2 The massing is expected to become slenderer from east to west than the Consented Scheme massing. The floorspace will increase overall by approximately 6,978 sqm from c.18,820 sqm

⁴ Town and Country Planning (Environmental Impact Assessment) Regulations 2011 as amended by Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015.

⁵ Planning Reference: HGY/2021/1039.

⁶ Planning Reference: HGY/2021/1043.

⁷ Planning Reference: PP-11787858.



to c.25,798 sqm. The Consented Scheme as altered by the Amendments is referred to as the 'Development'.

- 4.3 No amendments are proposed to the other phases of the Consented Scheme (Plots 1, 2, 4, 5 and 6). Alternative illustrative proposals for Plot 4 may be shown in the DAS to indicate how future proposals may alter the form of this building. Should this be the case, sensitivity tests may be carried out for specific technical topics (e.g. wind microclimate) and provided as an appendix to the ES Addendum.

5 EIA Scoping Process

- 5.1 An explanation of the differences between 'formal' and 'informal' scoping is provided below.
- 5.2 Under Regulation 15 of the EIA Regulations, an applicant making an EIA application may ask the local planning authority for a scoping opinion, i.e. their opinion as the scope and level of detail of the information to be provided in the ES. On receipt of such a request, the local planning authority is required to consult with relevant consultation bodies and adopt a formal EIA scoping opinion within a statutory 5-week period from the date of receipt. This provision under the EIA Regulations is not mandatory.
- 5.3 A commonly adopted alternative to this approach is to engage "informally" with the relevant planning authority. This informal scoping process is not bound by the 2017 EIA Regulations and simply means that a formal scoping opinion is not being requested by the Applicant under Regulation 15. Instead, the applicant seeks to agree the scope of the ES with the planning authority through discussions and correspondence. The planning authority is not duty bound to consult with consultation bodies (Regulation 15 (4)) and is not required to adopt a formal scoping opinion.
- 5.4 Due to the availability of relevant environmental information on the Site associated with the Consented Scheme (i.e. the ES), the Applicant has elected not to request a scoping opinion under the EIA Regulations. However, the technical scope of this EIA has been informed by the findings of this environmental reporting, as well as consultation undertaken as part of the design development. The project team intend to continue working collaboratively with LB Haringey officers and other stakeholders to reach an agreed position on the EIA scope such that the ES will meet the necessary legal requirements and expectations.

6 EIA Approach

- 6.1 If approved, a S.73 application is considered a new planning consent. Therefore, the S.73 application must be submitted with an ES that assess and reports the significant environmental effects of the S.73 scheme in line with the relevant EIA Regulations.
- 6.2 This ES Addendum will be submitted together with the 2015 ES. We propose that the assessments provided within the ES Addendum focus on the proposed changes to Plot 3 but also take into consideration the effects of the consented and partially constructed NDP.
- 6.3 All previously considered topics in the 2015 ES will be covered in the ES Addendum. The EIA Regulations require the ES Addendum to consider only the 'likely significant environmental



effects' of a development. UK Government's online Planning Practice Guidance (PPG)⁸ highlights the expectation that the ES should remain '*proportionate*' and focus on the '*main*' or '*significant*' environmental effects only. Taking this into account, the proposed approach will comprise a mix of fully updated/replacement ES chapters and 'Statement of Conformity' chapters, which provide a review-style update to the respective 2015 SE chapter.

- 6.4 The topics of Wind; Daylight, Sunlight and Overshadowing; and Townscape and Visual Impacts will be fully updated and reassessed. The remaining topics assessed within the 2015 ES would be scoped to a more succinct assessment that provides Statements of Conformity. These topic chapters would provide an update on the assessment context and rationale on validity of these topic assessments to inform LB Haringey's decision making. Each Statement of Conformity would provide reviews of current legislation / policy, baseline conditions, cumulative schemes and discrete updates to topic assessments / modelling (e.g. transport, air quality, noise) as necessary.
- 6.5 The EIA Regulations introduced new requirements to consider the potential environmental effects of greenhouse gas emissions, climate change resilience, human health, biodiversity, and accidents and disasters which were not applicable under the previous legislative regime. While it is not considered necessary to provide new assessments for human health and accidents and disasters (see rationale in Table 1), we proposed that a tightly scoped Greenhouse Gas and Climate Change assessment is included in the ES Addendum – focussed principally on the potential effects associated with the embodied carbon and greenhouse gas emissions of the Plot 3 proposals in the context of the Consented Scheme.
- 6.6 This structure is set out in further detail in Table 1, along with rationale for the proposed technical scope for each assessment.

⁸ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government, (2021). National Planning Practice Guidance. Available online at: <http://planningguidance.planningportal.gov.uk/blog/guidance/environmental-impact-assessment/>



Table 1: Proposed Approach to Technical Chapters of ES Addendum

Topic	Chapter Type	Rationale and Proposed Scope of Assessment
Air Quality	Statement of Conformity	The Site is located in an Air Quality Management Area (AQMA), designated for the entire borough. The 2015 ES identified minor/moderate adverse residual construction effects and neutral to moderate adverse effects (in relation to plant emissions) from the operational phase. The CEMP will set out good construction site practice measures that would mitigate the potential for adverse air quality impacts during construction works. This would include dust suppression measures, hoarding, and good management of stockpiles and vehicles. Given that the completed Development is estimated to only lead to imperceptible increases in vehicle trips relative to the Consented Scheme due to a minor increase in floorspace, it is not considered that there would be any notable increases in road traffic emissions and negligible effects would still be expected. The completed Development would not introduce more car parking spaces than those permitted within the Consented Scheme. The completed Development would meet LB Haringey requirements to ensure that building plant emissions would be minimal. Consequently, no significant air quality effects are predicted for the Development. Notwithstanding, an ES Addendum Statement of Conformity chapter will be provided. This will update the assessment in-line with current legislation / policy, baseline conditions, and consideration of cumulative schemes. An Air Quality Neutral and Air Quality Positive Statement will also be submitted with the planning application.
Archaeology	Statement of Conformity	The 2015 ES identified neutral/slight to slight/moderate adverse effects during the construction phase. The Amendments do not include any changes to the piling or proposed basement areas permitted under the Consented Scheme. As a result, no changes to the predicted likely significant effects are anticipated and the effects stated in the 2015 ES remain valid for decision-making. Notwithstanding, an ES Addendum Statement of Conformity chapter will be provided. This will update the assessment in-line with current legislation / policy and baseline conditions.
Cultural Heritage	Statement of Conformity	This Site is located in the North Tottenham Conservation Area with a locally listed late 19th century Station Master's House located in the south west corner of the Site. The Site adjoins the grounds of the Grade II



Topic	Chapter Type	Rationale and Proposed Scope of Assessment
		listed Grange (32, 34 and 34a) White Hart Lane, with a further 24 listed buildings located in the North Tottenham Conservation Area. The 2015 ES concluded minor to moderate beneficial effects on the North Tottenham Conservation Area and associated listed assets within it, and minor to major beneficial effects on the setting of nearby heritage assets. There were also beneficial effects identified on other local Conservation Areas. The maximum height of the Development (up to 117m) is an increase from the Consented Scheme. Whilst the height increase has the potential to affect the setting of the nearby Conservation Areas and heritage assets, the resultant effects are considered to be beneficial and of a scale similar to those previously reported for the Consented Scheme, i.e. not significant. Notwithstanding, an ES Addendum Statement of Conformity chapter will be provided. This will update the assessment in-line with current legislation / policy and baseline conditions.
Ecology	Statement of Conformity	The Site is not covered by any statutory or non-statutory site wildlife designations, with the closest designated sites – the Lee Valley Special Protection Area (SPA) and Ramsar site and Walthamstow Reservoirs Site of Special Scientific Interest (SSSI), located 1.15km south east of the Site boundary. The closest non-statutory site the Site is Tottenham Cemetery, All Hallows Churchyard and Bruce Castle Park Site of Importance for Nature Conservation located approximately 400m west of the Site boundary. No significant construction or operational effects were predicted in the 2015 ES. Once complete, the Development would bring forward new green space, which is likely to include native planting and integrated bat and bird boxes that will be incorporated into the Development. Overall, no significant effects are predicted from the Development. An ES Addendum Statement of Conformity chapter will be provided.
Surface Water Drainage and Flood Risk	Statement of Conformity	The majority of the Site lies in Flood Zone 1 which is classified as having a low probability of flood risk. Only the most southern part of the Site lies within Flood Zone 2 which has a low to medium probability of flood risk. The 2015 ES concluded that there would be neutral to minor beneficial water, flood risk and drainage effects during the construction phase, with neutral to minor beneficial residual effects predicted for the operational phase of the Consented Scheme. The FRA associated with the 2015 ES concluded that the Site had a low probability of flooding and that surface water runoff from the proposed development could be sustainably managed to ensure that flood risk was not increased elsewhere.



Topic	Chapter Type	Rationale and Proposed Scope of Assessment
		Measures will be put in place as part of the CEMP as required to manage Site water supply, flood risk and surface water drainage, avoiding contamination from dust generation, spillages and sediment run-off. The occupied Development would lead to an increased demand in the clean and foul water supply network due to the increase in hotel and residential users of the Site, however the existing drainage network is expected to have sufficient capacity to meet this demand. As such, no significant effects are expected for the Development. Notwithstanding, an ES Addendum Statement of Conformity chapter will be provided. This will update the assessment in-line with current legislation / policy and baseline conditions
Ground Conditions and Hydrogeology	Statement of Conformity	The Site is predominately vacant with no buildings present on-site. The 2015 ES concluded that there would be no significant effects for both the construction and operational stages of the Development. There is potential that the tallest elements of the Development would necessitate slightly deeper piling than previously considered for the 2015 ES. However, it is not envisaged this would result in any new or amended effects to those previously reported. The Site is predominantly surrounded by non-sensitive commercial uses. Sensitive residential receptors of those along Park Lane on the southern boundary of the Site. St Frances de Sales Church is located to the east of the Site, beyond High Road. Notwithstanding, an ES Addendum Statement of Conformity chapter will be provided. This will update the assessment in-line with current legislation / policy and baseline conditions
Noise and Vibration	Statement of Conformity	The noise and vibration assessment for the 2015 ES did identify significant noise and vibration construction phase effects in both the worst-case and average-case assessment. These predictions of construction noise effects assumed all items of equipment would be operating simultaneously in the same location. In reality not all equipment will be operating in one location simultaneously; therefore, these predictions are considered to be an overestimation of the noise levels experienced at the receptors. Given the temporary, short term nature of the sub structure and superstructure works for the Development and that all works will be carried out with adherence to a site specific CEMP that will set out good construction site practice measures to mitigate the adverse noise and vibration impacts (e.g. hoarding, hours of work, best practicable means), this is not considered to give rise to materially different significant effects to those



Topic	Chapter Type	Rationale and Proposed Scope of Assessment
		previously assessed for the 2015 ES and further assessment of potential noise impacts is not considered necessary. Minor to major adverse effects were identified in the 2015 ES, with significant effects on matchdays only. The Development is not expected to lead to any material change in these effects. Notwithstanding, an ES Addendum Statement of Conformity chapter will be provided. This will update the assessment in-line with current legislation / policy and baseline conditions
Townscape, and Visual Amenity	Updated ES Chapter	Baseline The character of the townscape is influenced by the new buildings developed as part of the Consented Scheme (i.e. constructed and operational Plot 1 and 2), residential properties surrounding the Site in all directions, community facilities including schools, colleges and churches. There are no statutory or local landscape or visual designations within the Site or local context. There are a number of designations that are of relevance to the assessment of townscape and views, including Lee Valley Regional Park, Metropolitan Open Land, Significant Open Land, Green Chase Open Space, Conservation Areas and Public Rights of Way. Assessment Approach The assessment will consider the following potential impacts and associated likely effects of the construction stage: ▪ Temporary visual intrusions as a result of construction activities; and ▪ Temporary changes to townscape character as a result of construction activities. The assessment will consider the following potential impacts and associated likely effects of the completed Development: ▪ Effects on the setting and heritage value of surrounding designated and non-designated heritage assets by virtue of developing in their setting; ▪ The effect of the Development on townscape character within the study area; and ▪ The impact of the Development on the visual amenity of receptors, and whether visual amenity will change as a result of the Development.



Topic	Chapter Type	Rationale and Proposed Scope of Assessment
		The Townscape Character areas to be assessed will comprise Townscape Character Areas (TCA) 1 – 3 as presented in Appendix 4. These are as follows: ▪ TCA 1: North Tottenham / Angel Edmonton; ▪ TCA 2: High Road / Fore Street; and ▪ TCA 3: Bruce Castle / Tottenham Cemetery. The visual receptors proposed to be included within the assessment will comprise 41 viewpoints. 19 relevant view positions have been selected from previous townscape work for the wider NDP consented scheme, and 1 view from the consented Tottenham Goods Yard scheme. 20 additional view positions have been chosen by the technical specialist to fully illustrate the visual effects of the Development. Of this combined set, 29 views have been selected to be produced as Accurate Visual Representations (AVRs) and 11 views as non-verified model views where the scheme has limited visibility or the view is not from a sensitive townscape context. The proposed viewpoints are presented in Appendix 4. The above assessments will be undertaken on the basis of a number of representative views for the identified assessment scenarios.
Socio-economics	Statement of Conformity	The Development would comprise hotel and residential-led use. There are no proposed changes to the number of hotel units or residential units. The 2015 ES did not conclude any significant adverse effects associated with the construction phase of the Development, with significant beneficial effects identified during the operational phase. It is considered unlikely that the minor uplift in floorspace for both the hotel and residential uses would result in any new or amended socio-economic effects as those presented within the 2015 ES. Notwithstanding, an ES Addendum Statement of Conformity chapter will be provided. This will update the assessment in-line with current legislation / policy and baseline conditions
Traffic and Transport		The Site is located between the Worcester Avenue to the east, Park Lane to the south and High Road (A1010) to the west. The 2015 ES did not identify significant effects during the construction phase and it is not envisaged that the Amendments would alter these conclusions. Construction traffic routes, movements and associated effects such as driver disruption, dust and dirt nuisances would be dealt with through standard and widely used



Topic	Chapter Type	Rationale and Proposed Scope of Assessment
		management measures and managed through adherence to a CEMP. The net change in Heavy Goods Vehicles ('HGVs') and light vehicular traffic flows on the local road network during construction of the Development is not expected to be significant in the context of existing traffic flows on the surrounding highways. The 2015 ES concluded that there would be no significant residual effects on during the operations phase for the Consented Scheme. The Development is not considered to result in significant transport effects once it is complete and operational. As part of the Consented Scheme, a number of mitigation measures were employed to ensure no significant operational effects associated with the stadium and other future uses were likely. This included service enhancements and station upgrades to Seven Sisters Interchange new bus station at Tottenham Hale, a new Victoria Line timetable with increased frequency of trains, reconfiguration of pedestrian footpaths. A Travel Plan will be prepared to promote these sustainable transport modes and reduce the use of private cars by the future occupants. The pavements and existing public transport network are considered to have sufficient capacity to accommodate the increase in use associated with the Development and no significant effects on these networks are considered to be likely. The Consented Scheme did not identify significant traffic effects. The proposed amendments to the Plot 3 Site will not amend the effects reported within the 2015 ES as the uplift in floorspace is minor and will not lead to additional trips to those reported previously. The main modes of travel for future occupants of the Development will be by public transport or active travel modes, such as cycling or walking. A Healthy Streets Transport Assessment, including a Parking and Access Statement and a Delivery and Servicing Plan, and Travel Plan will be submitted with the planning application.
Wind Microclimate	Updated ES Chapter	Baseline The UK Meteorological Office supplies records of the number of hours that wind occurs for ranges of wind speed and by direction. Meteorological data for London (Heathrow and London City Airports) provides a representation of the local wind microclimate for the area, which will be utilised for the present day. The prevailing wind throughout the year in London is from the south west. This is typical for many areas of southern England. There is a secondary peak from the north east during the spring and summer. The winds from the north east are not as strong as the prevailing winds from the south west. Assessment Approach



Topic	Chapter Type	Rationale and Proposed Scope of Assessment
		Wind tunnel testing will be undertaken to assess the local wind environment associated with the baseline and completed Development. This will determine the resulting pedestrian comfort and safety within and surrounding the Site in accordance with the accepted Lawson Comfort Criteria. The testing will provide a detailed assessment of the mean and gust wind conditions in and around the Site for 36 wind directions, in 10° increments in terms of pedestrian comfort and safety and provides a basis to assess the potential wind microclimate impacts and likely effects of the Development with regards to its intended use. To produce the results within the wind tunnel, a 1:300 scale model comprising the Site and the surrounding area (including relevant existing and future buildings and other topographical features) will be constructed on a 2.4m diameter disc allowing for the surrounding area within a 360m radius of the centre of the Site to be modelled. This radius is considered a large enough scale to ensure all likely wind effects are captured. Other developments outside the 360m radius of the Site would not individually be expected to modify the wind approaching the Site and as such have been included within the analysis of the surrounding terrain. To model the likely effects of gustiness or turbulence (which depends on the geographical location), a series of spires and floor roughness elements will be employed in the wind tunnel to create a 'boundary layer' that is representative of the urban location of the Site. Wind speed measurements around the Site for the tested configurations will be established using Irwin probes. These measure the mean and gust (peak) wind speeds at selected locations on the ground floor level and on elevated levels to represent sensitive locations such as entrances, amenity areas and thoroughfares, at a full-scale height of approximately 1.5m above the surface upon which the probe is located. Where potential instances of unsuitable wind conditions are identified with the Development in situ, mitigation measures will be tested to ensure suitable wind conditions within and around the Site.
Daylight, Sunlight and Overshadowing	Updated ES Chapter	Baseline There are no buildings on-site as they have been removed in line with the Consented Scheme prior to determination of this application. The Site comprises a temporary podium associated with the stadium. The existing buildings to the north of the Site have been developed as part of the Consented Scheme (i.e. Plots 1 and 2). There are residential units present to the south of Park Lane, adjacent to the southern Site boundary.



Topic	Chapter Type	Rationale and Proposed Scope of Assessment
		Residential properties and open space close to the Site that could potentially be affected by the Development, include residential dwellings, surrounding the scheme. Assessment Approach The completed Development will introduce a new building onto the Site of amended height and massing. This new building may have the potential to affect light levels to existing surrounding residential receptors, as well as overshadowing to surrounding amenity spaces. The daylight, sunlight and overshadowing assessment will cover the following aspects: ▪ Loss of natural daylight to adjacent properties external to the Site within the study area; ▪ Loss of natural sunlight to adjacent properties external to the Site within the study area; and ▪ Overshadowing of public / private external amenity space external to the Site within the study area. A review of cumulative schemes will be undertaken, with the future residential occupants of these schemes will be considered as potentially sensitive future receptors, should they be within a distance to the Site that would be affected by changes to daylight, sunlight and overshadowing.
Electronic Interference	Statement of Conformity	The 2015 ES concluded that there would be no significant effects associated with electronic interference during the construction and operational stages of the Development. The increase in height and massing is limited to Plot 3 only and is considered to have no change to available television services for identified receptors. As such, there will be no change to the effects reported within the 2015 ES. However, a brief Statement of Conformity will be provided.
Climate Change and Greenhouse Gases	New ES Chapter	Baseline The Site contains no permanent structures, predominantly comprising a podium associated with the stadium, along with public realm and temporary structures. To enable a worst-case assessment of climate change and greenhouse gas emissions, the baseline GHG emissions for the Plot 3 Site will be assumed to be zero. Assessment Approach The assessment will quantify the whole life GHG emissions from the Development over its lifetime. This will include GHG emissions during the construction, operational and eventual decommissioning phase of the Development. The approach to assessing likely significant effects will rely on IEMA guidance and apply



Topic	Chapter Type	Rationale and Proposed Scope of Assessment
		expert judgment on the significance of the Development's lifecycle GHG emissions taking into account any net change in emissions and: ▪ their likely contribution to local and national GHG emissions; ▪ their consistency with relevant policy; and ▪ an evaluation of the mitigation measures proposed to avoid, reduce and compensate GHG emissions. The resilience of the Development to future climate change will be qualitatively assessed following IEMA guidance. This will consider potential climate risks and adaptation requirements resulting from future climate change including heatwaves, flooding, drought, and extreme weather events.
Other EIA Topics (introduced in 2017 EIA Regulations)		
Human Health (including Health Impact Assessment)	Scoped out of ES Addendum	The Development would comprise hotel and residential-led use. There are no proposed changes to the number of hotel units or residential units. It is considered unlikely that these uses would result in any significant direct adverse health impacts or give rise to new likely significant health effects and this topics is scoped out of further consideration in this EIA. Furthermore, other planning application documents such as the Transport Assessment, FRA and air quality assessment would consider the Development's indirect or secondary impacts which could have an effect on health and well-being.
Risk of Major Accidents and / or Disasters	Scoped out of ES Addendum	There are no Control of Major Accidents and Hazards (COMAH) registered activities within or in the vicinity of the Site. Construction works will be undertaken in accordance with current health and safety regulations and guidance in order to minimise the risk of accidents. Due to the proposed uses of the Development, its operations will not include the use of hazardous substances or technologies. Therefore, the risk of a major accidents or disaster is not considered to be significant and is scoped out of further consideration in this EIA.



- 6.7 The year of the existing baseline will be 2023 (unless otherwise stated). Depending on grant of planning permission, it is expected that construction of the Development would be completed by the end of 2027. Therefore, 2027 will be the year of the completed Development assessment.
- 6.8 For the purposes of the ES Addendum, the Development will be defined by General Arrangement plans, area schedules and unit/tenure mixes.
- 6.9 The Applicant has committed to undertaking construction works in line with a detailed Construction Environmental Management Plan ('CEMP') as a means of avoiding, reducing or mitigating potential adverse effects of construction on the environment and local community. This is in line with Condition Ref. D2 of the Operative Permission which states:
- "The construction of the Plot 3 development above ground (and excluding any temporary landscaping proposals) shall not commence until a CEMP in relation to the construction works for the Plot 3 development have been submitted to and approved by the Council and construction of the development shall be carried out in accordance with the approved Plan."*
- 6.10 In line with IEMA good practice, the CEMP can be defined as 'tertiary' mitigation which is defined as that which *"will be required regardless of any EIA assessment, as it is imposed, for example, as a result of legislative requirements and/or standard sectoral practices. For example, considerate contractor practices that manage activities which have potential nuisance effects"*. As such, the CEMP is considered to be standard practice in the management of the construction of the Development. The CEMP will be taken into account and form the basis of the assessment of likely significant effects. Any effects that might have arisen without this mitigation will not be identified as 'likely effects', as there should be no potential for them to arise. This should result in a simpler and more proportionate ES. The CEMP will be subject to approval by LB Haringey and secured through an appropriate planning condition.
- 6.11 The ES Addendum will provide an assessment of the potential implications of the Development with cumulative schemes. The High Road West regeneration scheme submitted on behalf of Lendlease (Ref: HGY/2021/3175) ('Lendlease Scheme') is located adjacent to the west of the Site and was granted planning permission from LB Haringey on 31 August 2022. It is understood that the Lendlease Scheme is pending judicial review therefore two cumulative scenarios will be carried out, with and without this development.
- 6.12 The EIA approach will be to prepare an ES Addendum with the following assessment scenarios:
- **Assessment of Effects – Development:** this assessment will report the effects of the Development, with a focus on the amendments to Plot 3. The aim of this is to enable an understanding of what the potential effects of the Development are in comparison to the previous approved development;
 - **Cumulative Effects Assessment:** this assessment will report the effects of the Development + Cumulative Schemes (in the absence of Lendlease Scheme); and
 - **Cumulative Effects Assessment + Lendlease Scheme:** Development + Cumulative Schemes + Lendlease Scheme.
- 6.13 Appendix 3 sets out the proposed cumulative schemes for assessment; these are also shown in Appendix 1, Figure 2.



Appendix 1: Figures

Figure 1: Site Location Plan

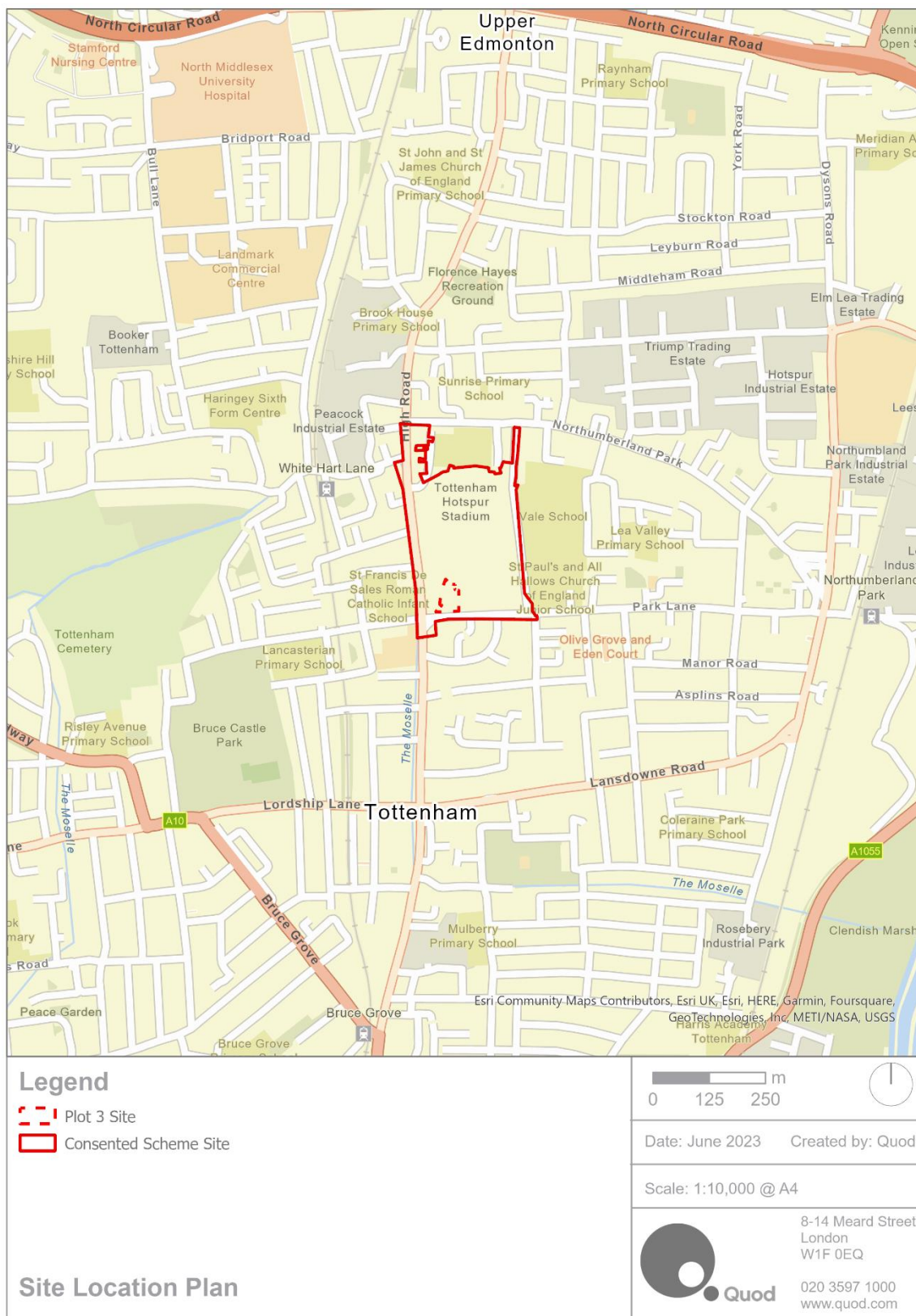
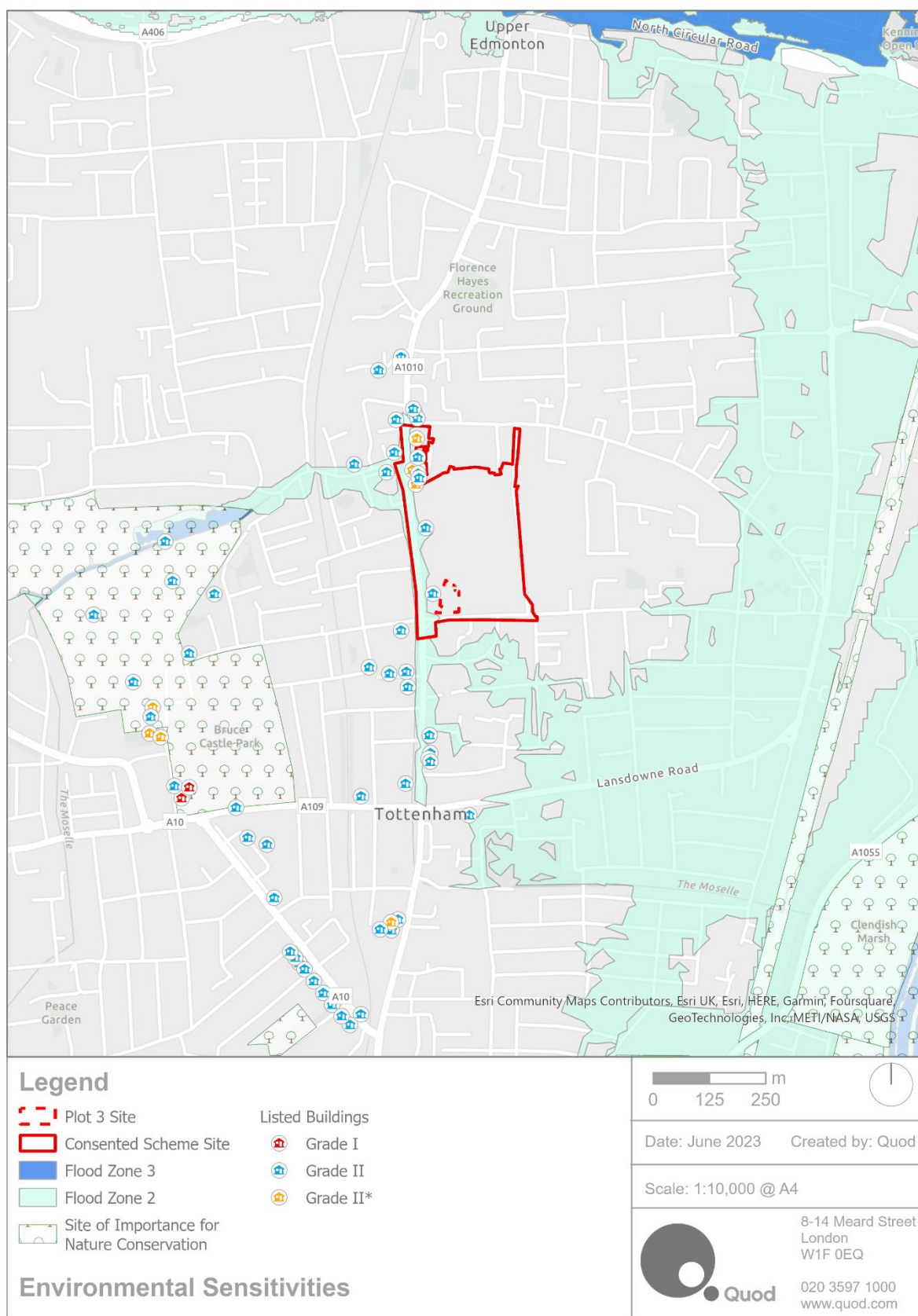




Figure 2: Environmental Sensitivities





Appendix 2: Planning History Summary

Planning application	Description of Development	Supporting Environmental Information	Development Status
Hybrid Planning Permission Ref. (HGY/2015/3000) Approved 15/04/2016	Proposed demolition and comprehensive phased redevelopment for stadium (Class D2) with hotel (Class C1), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and / or offices (Class B1); housing (Class C3); and health centre (Class D1); together with associated facilities including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works. Details of "appearance" and "landscape" are reserved in relation to the residential buildings and associated community and / or office building. Details of "appearance" and "scale" are reserved in relation to the sports centre building. Details of "appearance" are reserved in relation to the health centre building. Proposal includes the demolition of 3 locally listed buildings and includes works to a Grade II Listed building for which a separate Listed Building application has been submitted (Ref: HGY/2015/3001).	ES ('2015 ES')	Completed Consented Scheme components: - Plot 1; - Plot 2; - Temporary football pitches in south east of site; - Landscaping within Plot 5 extent
Non-Material Amendment Application (Ref. HGY/2017/1183)	Non-material amendment following a grant of planning permission HGY/2015/3000: proposed removal of 90 day restriction (Condition D16) to allow operation of hotel serviced apartments as C3, rather than C1 Use Class. Consequential amendments to Conditions A4, A7 and D1.	N/A	
Reserved Matters Application (RMA) for Phase 4 Ref. HGY/2021/1039	Application for the approval of reserved matters relating to the scale of Plot 4 'The Extreme Sports Building' of planning permission HGY/2015/3000 granted on 15.04.2016 for the demolition of the existing stadium and the phased redevelopment of the site to provide a new stadium, hotel, Tottenham Experience; sports centre ('The	N/A	



Planning application	Description of Development	Supporting Environmental Information	Development Status
	Extreme Sports Building'); community and / or office uses; housing; health centre ('The Community Health Building'); and associated works		
Reserved Matters Application for Phase 5 Ref. HGY/2022/4504	Application for the approval of reserved matters approval is sought in respect of 'landscaping' associated with Plot 5 (residential and B1/D1) associated with planning permission HGY/2015/3000 for the demolition of the existing stadium and the phased redevelopment of the site to provide a new stadium, hotel, Tottenham Experience; sports centre ('The Extreme Sports Building'); community and / or office uses; housing; health centre ('The Community Health Building'); and associated works.	N/A	
Reserved Matters Application for Phase 6 Ref. HGY/2021/1043	Application for the approval of reserved matters relating to the appearance of Plot 6 'The Community Health Building' of planning permission HGY/2015/3000 granted on 15.04.2016 for the demolition of the existing stadium and the phased redevelopment of the site to provide a new stadium, hotel, Tottenham Experience; sports centre ('The Extreme Sports Building'); community and / or office uses; housing; health centre ('The Community Health Building'); and associated works.	N/A	



Appendix 3: Cumulative Schemes

No.	Planning Reference	Address	Description	Status	Construction Programme
LB Haringey					
1	HGY/2021/2283 and HGY/2021/2284	819-829 High Road, Tottenham ('Printworks' site)	Full planning and listed building consent for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; the change of use of 819-827 High Road to flexible residential and commercial use; and the development of a mixed-use development to the rear comprising residential (c. 70 units), a cinema and supporting commercial uses.	Planning permission granted – Approved 31/08/2022	Construction programme: Construction works predicted to commence in June 2024 and anticipated to finish in January 2026.
2	HGY/2021/1771	Goods Yard and the Depot, High Road West	Detailed planning permission to deliver a comprehensive, residential led development of 867 new residential units in buildings ranging from three to 32-storeys in height.	Appeal granted – October 2022	Construction programme: Construction works predicted to commence in 2023 and anticipated to finish in 2029.
3	HGY/2020/1584	798-808 High Road, London, N17 0DH	Northumberland Terrace, Planning and LBC for the regeneration of 798-814 and land to the rear - Full planning application for the erection of a four storey building with flexible A1/A2/A3/B1/D1/D2 uses; external alterations to 798-808 High Road; change of use of 798-808 High Road to a	Permission Granted - Approved 09/04/21	Construction programme: construction anticipated to be 18 months, with completion in 2022



No.	Planning Reference	Address	Description	Status	Construction Programme
			flexible A1/A2/A3/B1/D1/D2 uses; demolition of rear extensions to Nos. 798, 800-802, 804-806, 808 and 814 High Road; erection of new rear extensions to Nos. 798, 800-802, 804-806 and 808 High Road; hard and soft landscaping works; and associated works.		
3	HGY/2021/3175	High Road West London N17	Hybrid Planning application seeking permission for 1) Outline component comprising demolition of existing buildings and creation of new mixed-use development including residential (Use Class C3), commercial, business & service (Use Class E), business (Use Class B2 and B8), leisure (Use Class E), community uses (Use Class F1/F2), and Sui Generis uses together with creation of new public square, park & associated access, parking, and public realm works with matters of layout, scale, appearance, landscaping, and access within the site reserved for subsequent approval; and 2) Detailed component comprising Plot A including demolition of existing buildings and creation of new residential floorspace (Use Class C3) together with landscaping, parking, and other associated works.	Permission Granted – 31 st August 2022	Construction programme: construction anticipated to commence in 2022 and complete in 2032.



No.	Planning Reference	Address	Description	Status	Construction Programme
4	HGY/2021/0441	807 High Road, London, N17 8ER	Full planning application for the demolition of the existing buildings and the erection of a replacement building up to four storeys to include residential (C3) (9 units), retail (Class E, a) and flexible medical / health (Class E, e) and office (Class E, g, i) uses; hard and soft landscaping works including a residential podium; and associated works.	Permission Granted – Approved 03/09/2021	Construction programme: if permission granted (2021), construction anticipated to be 12 months
LB Enfield					
5 ⁹	16/01197/RE3	Meridian Water, Willoughby Lane And Meridian Way, London, N18	Outline application for development of Phase 1 of Meridian Water comprising up to 725 residential units, new station building, platforms and associated interchange and drop-off facilities including a pedestrian link across the railway, a maximum of 950 sqm retail (A1/A2/A3), floorspace, a maximum of 600 sqm of community (D1) floorspace, a maximum of 750 sqm of leisure (D2) floorspace, associated site infrastructure works including ground and remediation works, roads, cycle-ways and footpaths, utility works above and below ground,	Permission granted July 2017.	Construction programme: Construction is in progress. Construction commenced in Q1 2020 and is anticipated to finish in Q1 2022. Assumed full occupation: Q2 2022.

⁹ Being tested for consideration in the TVIA only; all other technical topics will be considered cumulative schemes 1 – 4 only.



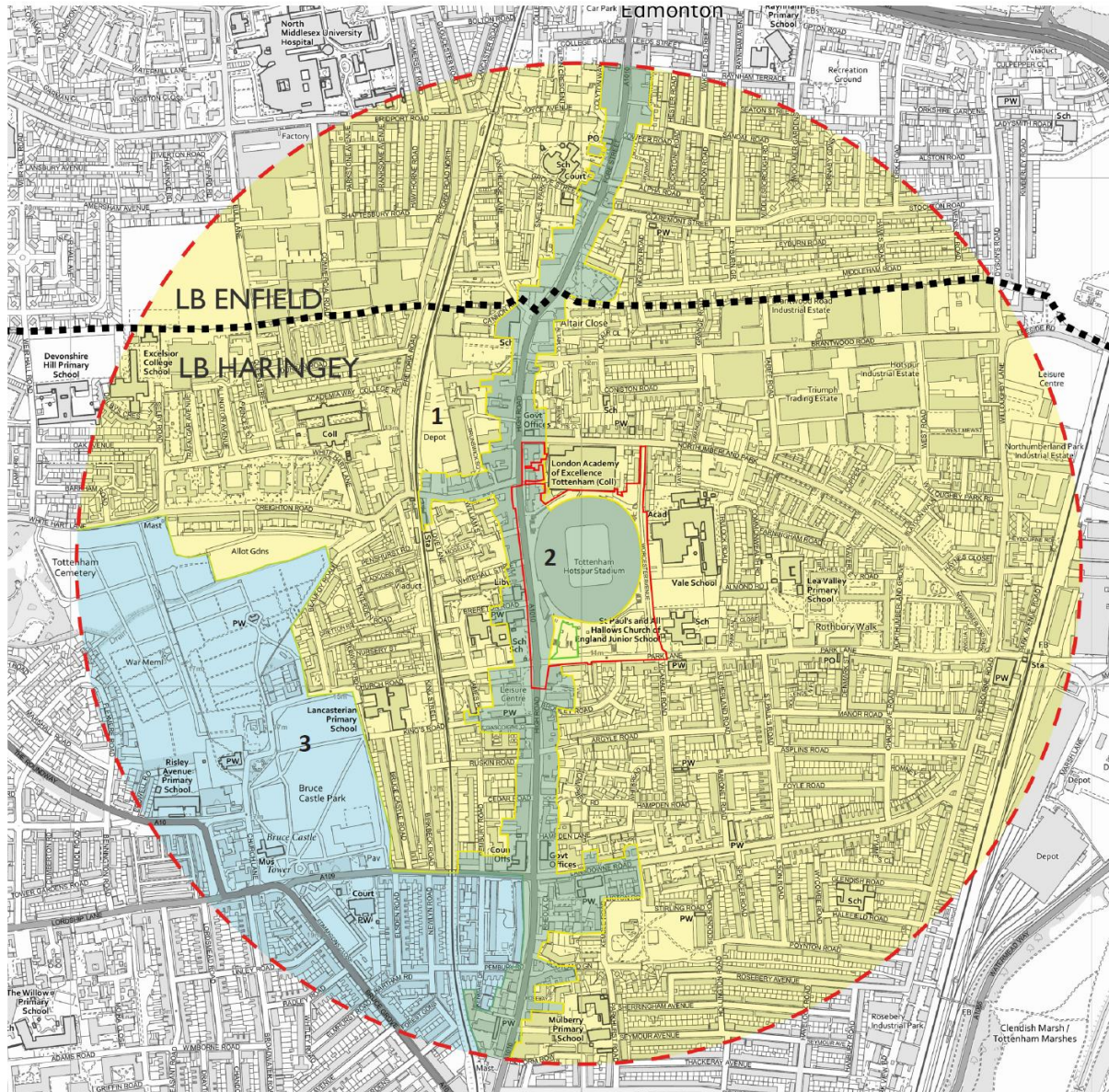
No.	Planning Reference	Address	Description	Status	Construction Programme
			surface water drainage works, energy centre and associated plant, public open space and children's' play areas, and various temporary meantime uses without structures (landscaping and open space).		
6	22/03346/OUT	Joyce Avenue And Snells Park Estate London N18	Hybrid planning application (part detailed/part outline) for the phased demolition of all existing buildings and structures, site preparation works and the comprehensive residential-led mixed use redevelopment comprising: Detailed planning application for Phases 0-3 comprising demolition of 12no.existing residential blocks, associated structures and Boundary Hall. Construction of residential and mixed-use buildings providing ground floor flexible commercial floorspace (Use Class E(a, b, c and e)) and community floorspace (Use Class F2(b)), residential dwellings (Use Class C3) with associated road layout, means of access including new pedestrian crossing over Sterling Way, highways works including alterations to junction of College Close and Sterling Way, car and cycle parking, hard and soft landscaping, amenity space, public, communal and	Application in progress	Outline CEMP states that construction will be undertaken in 11 phases over 22 years (2023-2045).



No.	Planning Reference	Address	Description	Status	Construction Programme
			private realm, ancillary plant and structures including new substation and associated works. Outline planning application (with all matters reserved) for Phases 4-10 including the demolition of all remaining buildings and structures. Construction of buildings for residential dwellings (Use Class C3), flexible commercial floorspace (Use Class E) including allowance for a drinking establishment (Sui Generis), civic and community floorspace and facilities including temporary re-provision of Boundary Hall (Use Classes F1 and F2) with associated road layout, means of access including new pedestrian walkway connecting to existing bridge to Bridport Road, highways works, car and cycle parking, landscaping including improvements to the boundary of St John and St James Church of England Primary School, amenity space, public, communal and private realm, ancillary plant and structures and other associated works.		



Appendix 4: Townscape Character Areas Plan and Proposed Viewpoint Plan



- The Site
- TH Hotel Site
- Townscape Character Areas (TCA)
1. North Tottenham / Angel Edmonton
- TCA 2. High Road / Fore Street
- TCA 3. Bruce Castle / Tottenham Cemetery

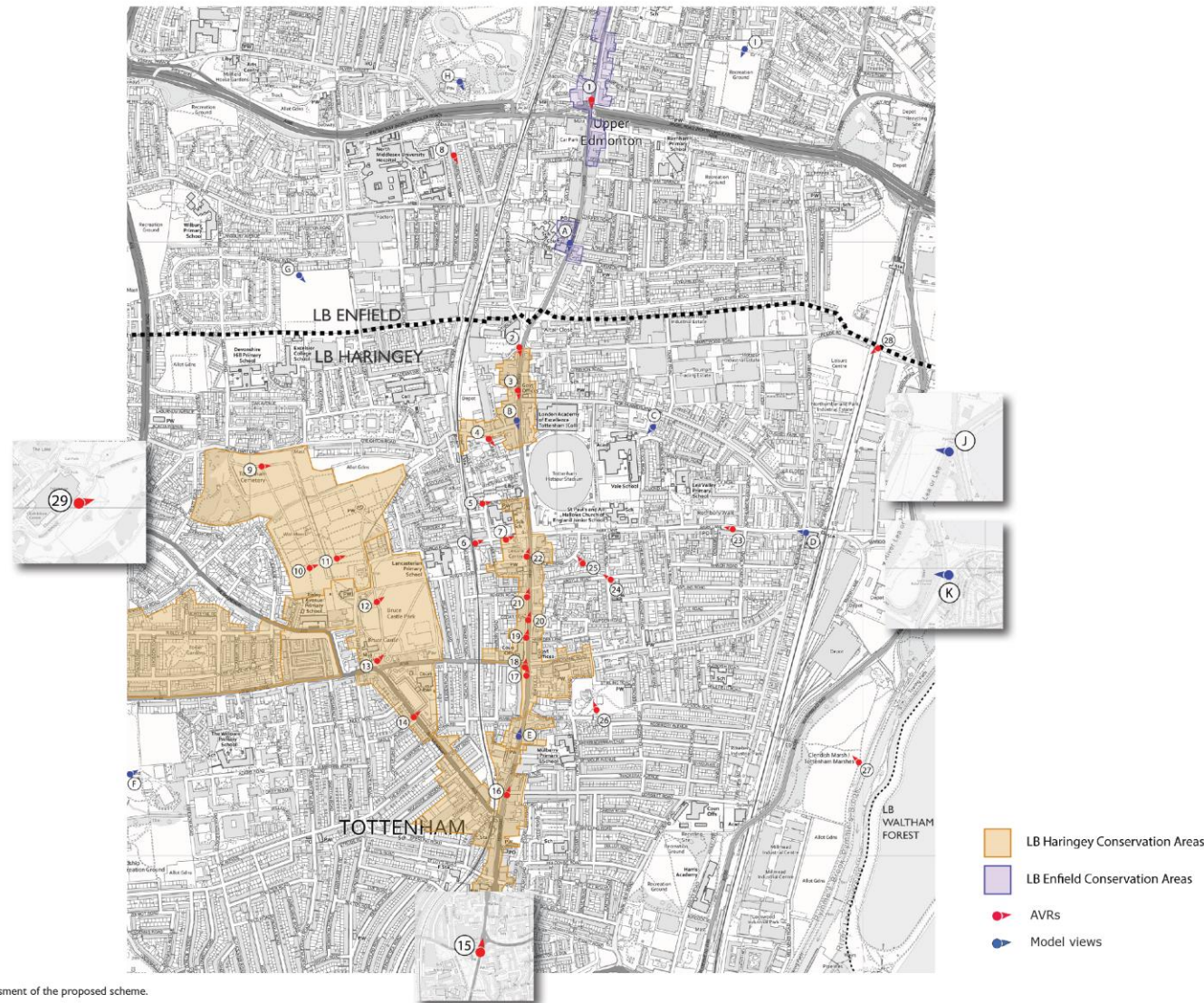


Fig 1.1: Map showing preliminary viewpoints for assessment of the proposed scheme.