



The Printworks, High Road West

Ecological Impact Assessment

For Goodsyard Tottenham Limited

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1 Introduction

1.1 Project Background

- 1.1.1.1 Logika Consultants Ltd. ('Logika') has been commissioned by F3 Architects LLP, on behalf of Goodsynd Tottenham Limited, to undertake an Ecological Impact Assessment (EclA) for the redevelopment of The Printworks, High Road West at 819 – 829 High Road, London (hereafter referred to as 'the Site').
- 1.1.1.2 This report details the EclA, providing an overview of the ecological features present, or potentially present on or close to the Site. The EclA describes baseline conditions on the Site, ascribes a level of importance to each ecological feature identified and provides an assessment of the potential effects associated with redevelopment of the Site.
- 1.1.1.3 This EclA follows the '*Guidelines for Ecological Impact Assessment in the UK and Ireland*' published by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2018, updated 2022¹) and has been based on information gained from a desk study and an extended Phase 1 habitat survey.
- 1.1.1.4 In addition, the baseline biodiversity value of the Site has been established using Natural England's Small Sites Metric 4.0 (Natural England and Other Parties, 2023²).

1.2 The Site

- 1.2.1.1 The Site (see **Figure 1.1**) is centred at Ordnance Survey (OS) grid reference TQ 33825 91494, located along A1010 High Road, Tottenham, within the London borough of Haringey. The Sites comprises a large building complex with associated hardstanding.
- 1.2.1.2 The Site is surrounded by residential and commercial properties, with Tottenham Hotspur's stadium to the southeast, a railway line to the west and Tottenham Cemetery and Bruce Castle Park to the southwest.

¹CIEEM (2018, updated 2022) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management. Winchester, UK.

² Natural England and Other Parties (2023) The Small Sites Metric 4.0 – User Guide. Natural England

1.2.1.3 The proposed development is understood to include:

- The demolition of existing buildings and structures to the rear of 819-829 High Road and the demolition of 829 High Road
- Redevelopment of the Site for purpose-built student accommodation with supporting flexible commercial, business and service uses (Class E), hard and soft landscaping, parking, and associated works.

Figure 1-1 Site Location Plan



Imagery: @2023 Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group. Map Data: @2023 Google Maps

2 Legislation and Policy

- 2.1.1.1 There is national, regional and local planning policy and legislation that is relevant to new development and the conservation of biodiversity on the Site. This is set out in **Table 2-1** and **Table 2-2** respectively.

Table 2-1 Relevant Planning Policy

Planning policy document/ legislation	Relevant policies
National Planning Policy Framework³	Paragraph 179 states: “To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. Paragraph 180 states: “When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that

³ Ministry of Housing, Communities, and Local Government. National Planning Policy Framework. 2021 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf (Accessed 24/10/22)

Planning policy document/ legislation	Relevant policies
The London Plan (2021)	make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest; c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.” Policy G1: Green Infrastructure A) London’s network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits. B) Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A. C) Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to identify key green infrastructure assets, their function and their potential function and identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions. D) Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London’s wider green infrastructure network. Policy G5: Urban Greening A) Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. B) Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2 but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).

**Planning policy
document/ legislation**
Relevant policies

C) Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

Policy G6 Biodiversity and Access to Nature

A) Sites of Importance for Nature Conservation (SINCs) should be protected.

B) Boroughs, in developing Development Plans, should:

- 1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
- 2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
- 3) support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
- 4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
- 5) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

C) Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

- 1) avoid damaging the significant ecological features of the site
- 2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
- 3) deliver off-site compensation of better biodiversity value.

D) Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

E) Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and Woodlands

A) London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.

B) In their Development Plans, boroughs should:

Planning policy document/ legislation	Relevant policies
	1) protect 'veteran' trees and ancient woodland where these are not already part of a protected site¹³⁹ 2) identify opportunities for tree planting in strategic locations. C) Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
Haringey's Local Plan – Strategic Policies 2013 (with alterations in 2017)	Policy SP13: Open Space and Biodiversity New development shall protect and improve Haringey's parks and open spaces. All new development shall: • Protect and enhance, and when and where possible, extend the existing boundaries of the borough's Green Belt, designated Metropolitan Open Land, designated Open Spaces, Green Chains, allotments, river corridors and other open spaces from inappropriate development • Provide amenity space in accordance with the Council's Open Space and Recreational Standards Supplementary Planning Document (SPD) • Manage the impact of such new developments in areas adjacent to designated open spaces • Secure improvements, enhancement and management in both quality and access to existing green spaces • Seek on-site or financial contributions towards open space from new developments as set out in the Open Space and Recreational Standards SPD • Seek to secure opportunities for additional publicly accessible open space especially in those identified areas of Open Space deficiency e.g. in the east of the borough where the quality and amount of provision is poorer as set out in the Council's Open Space and Recreational Standards SPD • Conserve the historic significance of the borough's designated historic parks and gardens.
Haringey Development Management DPD (Adopted July 2017)	Policy DM19: Nature Conservation A) Development proposals on sites which are, or are adjacent to, internationally designated sites, Sites of Special Scientific Interest, Local Nature Reserves, Sites of Importance for Nature Conservation or Ecological

Planning policy document/ legislation	Relevant policies
	Corridors, should protect and enhance the nature conservation value of the site. B) Development that has a direct or indirect adverse impact upon important ecological assets, either individually or in combination with other development, will only be permitted where: • The harm cannot be reasonably avoided; and • It has been suitably demonstrated that appropriate mitigation can address the harm caused. Policy DM20: Open Space and Green Grid Relevant points within this policy for consideration are: A) Development that protects and enhances Haringey's open spaces will be supported. • The Council will require all development providing new or replacement open space, wherever possible, to connect to the All London Green Grid. Protection and enhancement of this network will make a positive contribution to Haringey and its communities, in addition to providing social, recreational and ecological benefits. • Development adjacent to open space should seek to protect and enhance the value and visual character of the open land. • Sites over 1Ha in size which are located in identified areas of open space deficiency should seek to create new publicly accessible open space on the site, in accordance with the open space standards set out in the Haringey Open Space and Biodiversity Study (2013), subject to viability. • Consideration will be given to designating Local Green Spaces in line with national planning guidance.
Tottenham Area Action Plan (2017)	Policy AAP9: Tottenham Green Grid A) In areas identified as deficient in access to open space and nature, a high priority will be afforded to opportunities to enhance access through on-site provision or contributions to the implementation of relevant Tottenham Green Grid projects. B) Development proposals for sites adjoining the Green Grid will need to take account of the route and ensure that opportunities are taken to provide new developments which address the route along its built edges. C) The principles included in the Council's Green & Open Spaces Strategy should be adhered to in the creation of the Green Grid

Table 3-2 Relevant Legislation

Relevant legislation	Relevance to Assessment
The Environment Act 2021⁴	The Environment Act covers a wide range of environmental aspects, including the provision of Biodiversity Net Gain (BNG). All development projects consented under the Town & Country Planning Act 1990 (as amended), unless of very small scale or permitted development, will be required to provide a BNG of 10% or more calculated using a standard approach (which is known as the Biodiversity Metric 3.1). This will become mandatory in 2023 following the issue of secondary legislation.
Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”) as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019⁵	These regulations transposed Council Directive 92/43/EEC on the conservation of natural habitats and wild flora and fauna (‘the Habitats Directive’) into national law. They also transposed elements of Council Directive 2009/147/EC on the conservation of wild birds (‘the Birds Directive’). The Habitats Regulations provide the framework for the protection of Natura 2000 sites (now referred to as the national site network following the amendments that came into force on 31 December 2020), and for certain flora and fauna (known as European Protected Species (EPS)). The regulations set out the process with regard to the assessment of development.
Natural Environment and Rural Communities Act 2006 (as amended by the Environment Act 2021) (‘the NERC Act’)⁶	The NERC Act (amongst other matters) places a duty to conserve and enhance biodiversity on public authorities in England. This requires local authorities and government departments to have regard to the purposes of conserving biodiversity in a manner that is consistent with the exercise of their normal functions. The NERC Act also places a duty on the Secretary of State to maintain lists of species and habitats which are regarded as being of principal importance for the conservation of biodiversity in England. These Habitats of Principal Importance (HPI) and Species of Principal Importance (SPI) are used to guide decision makers in implementing their

⁴ The Environment Act 2021. Available at <https://www.legislation.gov.uk/ukpga/2021/30/contents?section=102-3> (Accessed: 15th January 2022)

⁵ The Conservation of Habitats and Species Regulations 2017. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents/made> (Accessed 24/10/22)

⁶ The Natural Environment and Rural Communities Act 2006 c.16. Available at: <https://www.legislation.gov.uk/ukpga/2006/16/contents> (Accessed 24/10/22)

Relevant legislation	Relevance to Assessment
	duties to have regard to the conservation of biodiversity in England when carrying out their normal functions.
Countryside and Rights of Way Act 2000 ('the CRoW Act')⁷	This CRoW Act, amongst other elements, details further measures for the management and protection of Sites of Special Scientific Interest (SSSI) and strengthens wildlife enforcement legislation.
Wildlife and Countryside Act 1981 (as amended) (WCA)⁸	The WCA consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats ('the Bern Convention') and Council Directive 79/409/EEC on the conservation of wild birds (Birds Directive). Amongst other matters it provides protection for wild birds, certain flora and fauna and sets the framework for the protection and management of SSSIs

3 Methodology

3.1 Desk Study

3.1.1.1 A desk study was undertaken in June in 2023 to gather existing information on statutory and non-statutory sites (known as Sites Important to Nature Conservation (SINCs)⁹ in London) designated for nature conservation, Habitats and Species of Principal Importance and legally protected, controlled or otherwise notable species from the last 10 years, within the Site or in the area over which effects on ecological features of development could be realised (referred to as the Zone of Influence¹⁰ or Zol). Table 3-1 describes the ecological features for which data was collected, the relevant Zol for each ecological feature and the sources of the information.

⁷ Countryside and Rights of Way Act 2000 c.37. Available at: <https://www.legislation.gov.uk/ukpga/2000/37/contents> (Accessed 24/10/22)

⁸ Wildlife and Countryside Act 1981 c.69. Available at: <https://www.legislation.gov.uk/ukpga/1981/69> (Accessed 24/10/22)

⁹ In London, there are three types of Sites Important for Nature Conservation. These are, in order of importance: Sites of Metropolitan Importance for Nature Conservation which are those sites which contain the best examples of London's habitats and Sites of Borough Importance which are important on a borough perspective.

¹⁰ The Zols used within the desk study are set on a precautionary basis to ensure that all potential constraints are identified.

Table 3-1 Ecological features, Zol and information sources

Ecological Feature	Zol (km)	Data sources
European sites¹¹	5	Magic.gov.uk ¹² Natural England's designated sites website ¹³
Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR)	2	Magic.gov.uk Natural England's designated sites website
Local Nature Reserves	1	Magic.gov.uk Natural England's designated sites website
SINC	1	GiGL
Habitats of Principal Importance / Ancient Woodland	1	Priority Habitat Inventory and Ancient Woodland Inventory - provided on Magic.gov.uk and Forestry Commission Map Browser
Legally protected and notable species - bats and aquatic mammals (otter and water vole)	1	GiGL European Protected Species licence returns - provided on Magic.gov.uk
Legally protected and notable species – all other species	1	GiGL European Protected Species licence returns - provided on Magic.gov.uk

¹¹ Following UK Government advice this includes Special Areas of Conservation (SAC), Special Protection Areas (SPA), proposed SAC, potential SPA, Ramsar sites and proposed Ramsar sites. SAC and SPA are protected via legislation, whilst the other sites are treated comparatively through policy. See <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site#European-sites> (Accessed: 01/11/2022)

¹² Available at <https://magic.defra.gov.uk/magicmap.aspx> (Accessed 01/11/2022)

¹³ Available at <https://designatedsites.naturalengland.org.uk/> (Accessed 01/11/2022)

Waterbodies (ponds, wet ditches, lakes) inside or within 500m of the Site 0.5

Satellite imagery and Ordnance Survey mapping

Veteran trees 0.5 Ancient Tree Inventory¹⁴

3.1.1.2 In addition to the ZOI set from the location of the Proposed Development, Natural England's SSSI Impact Risk Zones were also reviewed to identify any location specific constraints with regards European sites or SSSIs.

3.1.1.3 The information gathered has been used to identify potential constraints, inform recommendations regarding implementation of mitigation, compensation and enhancement measures and shape recommendations for further ecological survey, as necessary.

3.2 Previous Reports

3.2.1.1 In 2021 an Ecological Appraisal was undertaken of the Site was undertaken by Buro Happold. This report (Buro Happold (May 2021) The Printworks, High Road West, Ecological Appraisal Report (ref: HRW-BHE-PW-XX-RP-YM-0011)) was reviewed as part of the desk study for any information relevant to the impact assessment.

3.3 Site Survey

3.3.1.1 A Site walkover was undertaken in accordance with the methods described by the Joint Nature Conservation Committee in '*Handbook for Phase 1 Habitat Survey – A Technique for Environmental Audit*' (JNCC 2010). The survey was conducted on the 6th of June 2023 by Alexandra Jackson MZool (Hons) when weather conditions were dry with good visibility.

3.3.1.2 All habitats within the Site and within 50m of the boundary (where access was available) were identified, described, and mapped during the survey, and an indicative botanical species list compiled.

3.3.1.3 The survey was extended to highlight the potential presence of protected and / or priority species. This involved a search to identify the presence or potential presence of notable and / or legally protected species such as breeding birds, badger, dormouse, bats, reptiles,

¹⁴ Available at <https://ati.woodlandtrust.org.uk/tree-search/> (Accessed 01/11/2022)

and amphibians. Target Notes (TNs) were used to record any features or habitats of ecological interest.

3.4 Preliminary Roost Assessment (PRA)

- 3.4.1.1 Survey methods followed best practice guidelines, interpreted using professional experience. The Bat Conservation Trust (BCT) third edition of Good Practice Guidelines (2016)¹⁵, The Bat Mitigation Guidelines¹⁶, and Bat Workers' Manual¹⁷, were taken into account when designing this survey method.
- 3.4.1.2 A preliminary roost assessment (PRA) was conducted on all built structures on and adjacent to the Site. This included a ground-based visual inspection of the exterior of structures and tree to assess their potential to support roosting bats. In assessing potential to support roosting bats, the external inspection considers the following factors:
- The presence of potential roost features (PRFs) such as roof voids, soffit boxes with access gaps, spaces between roof tiles and lining felt or boarding, gaps under bargeboards, roof tiles, hanging tiles, lead flashing and/or weatherboarding.
 - Expected levels of artificial lighting around potential roost entrances.
 - Expected levels of disturbance to any potential roosts.
 - Quality of habitat for roosting bats at the structure, and the potential for bat foraging and/or commuting routes in the surrounding area.
- 3.4.1.3 Considering all the factors listed above, the structures and trees onsite were then categorised according to the level of potential for it to support roosting bats, following BCT guidance:
- **Confirmed roosts** – where it was possible to determine that the structure supports a PRF that is used or has been used by bats.
 - **High potential suitability** – a structure with one or more PRFs that are obviously suitable for use by large numbers of bats on a regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions, and surrounding habitat.

¹⁵ Collins, J. (ed) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London.

¹⁶ Mitchell-Jones, A.J. (2004) Bat Mitigation Guidelines English Nature, Peterborough

¹⁷ Mitchell-Jones, A.J. & McLeish, A.P. (2012) The Bat Workers' Manual. Pelagic Publishing, Exeter.

- **Moderate potential suitability** – a structure with one or more PRFs that could be used by bats due to their size, shelter, protection, conditions, and surrounding habitat, but that are unlikely to support a roost type of high conservation status.
- **Low potential suitability** – a structure with one or more PRFs that could be used by individual bats opportunistically. PRFs do not provide sufficient space, shelter, protection, conditions and/or surrounding habitat to be used on a regular basis or by large numbers of bats.
- **Negligible suitability** – negligible habitat features on site likely to be used by roosting bats.

3.4.1.4 On the whole, structures were categorised according to their potential to support bat roosts throughout the year, with the highest level of potential assigned (i.e., if a building had high potential to support a summer roost and low potential to support a winter roost it would be categorised, overall, as being of high potential).

3.5 Limitations

3.5.1.1 The desk study includes data on habitats and species that has been collected by both professional ecologists and members of the public both as part of focused survey efforts and as a result of incidental encounters. The desk study information therefore only provides contextual data and does not rule out the presence of habitats and species for which records have not been provided.

3.5.1.2 There were no limitations in terms of access, weather and/or timings during the field survey.

4 Results

4.1 Desk study

4.1.1 Designated Sites

4.1.1.1 There are two European sites within 5km of the Site, Lee Valley SPA/Ramsar and Epping Forest SAC, these are described in Table 4-1.

Table 4-1 Sites of Special Scientific Interest within 2km of the Site

Site	Designation	Distance from Site	Description
Lee Valley	SPA/Ramsar	1.7m southeast	Comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits, providing a variety of man-made and semi-natural wetlands. Supports nationally scarce plants such as whorled watermilfoil <i>Myriophyllum verticillatum</i> , nationally rare/vulnerable invertebrates including water boatman <i>Micronecta minutissima</i> . And waterbirds such as the Shoveler <i>Anas clypeata</i> and Gadwall <i>Anas strepera</i> .

Site	Designation	Distance from Site	Description
Epping Forest	SAC	4.8km east	Designated for supporting Annex I habitats of beech <i>Fagus sylvatica</i> forests and wet and dry heaths and for its population of Annex II stag beetle <i>Lucanus cervus</i> .

- 4.1.1.2 There is one SSSI within 2km of the Site, which is Walthamstow Reservoir, which forms part of the Lee Valley SPA/Ramsar site designation (see Table 4-2).

Table 4-2 Sites of Special Scientific Interest within 2km of the Site

Site	Designation	Distance from Site	Description
Walthamstow Reservoirs	SSSI	1.7km southeast	The site contains major heronries and breeding wildfowl population. Important gathering area for moulting tufted duck and in winters, it is an attraction site for nationally significant populations of wildfowl and other wetland birds.

- 4.1.1.3 There are no Local Nature Reserves within 1km of the Site.

- 4.1.1.4 There are three SINC within 1km of the Site which are described in Table 4-3.

Table 4-3 SINC within 1km of the Site

Site	Designation	Distance from Site	Description
Tottenham Cemetery, All Hallows Churchyard and Bruce Castle Park	SINC - local importance	375 m southwest	The site attracts numerous migrant birds in spring and autumn. Small areas of grass are managed as meadow. The cemetery contains a large pond with two islands, providing nest sites for common waterfowl.
Pymme's Park and Pymme's Brook	SINC – borough importance grade 2	1 km north	Contains a large lake with islands and is home to a wide variety of waterfowl, invertebrates and amphibians.
Devonshire Hill Allotments	SINC - local importance	1 km west	Support important populations of amphibians and reptiles, especially slow worms and grass snakes (grass snakes are known from at least two allotment sites in the north of the borough), as well as birds, mammals and invertebrates.

4.1.2 SSSI Impact Risk Zones

- 4.1.2.1 The Site is within an Impact Risk Zone (IRZ) for both Walthamstow Reservoirs and Epping Forest SSSIs. Of relevance to the proposed development, Natural England require consideration of residential developments of over 100 units.

4.1.3 Habitats and Species Records

- 4.1.3.1 Several HPI's, all deciduous woodland, were identified during the desk study using MAGIC. None occurred on Site, with all of them being within Tottenham Cemetery, All Hallows Churchyard and Bruce Castle Park SINC, approximately 375m southwest.
- 4.1.3.2 OS mapping and satellite imagery show there are no ponds within 500m of the Site boundary, however there is The Moselle, a river flowing through the Tottenham Cemetery, which was originally a tributary of the River Lea, but now flows into the Pymmes Brook, another Lea tributary.
- 4.1.3.3 There are no records of amphibians, including great crested newt (GCN) *Triturus cristatus* or other protected species, such as water vole *Arvicola amphibius*, otter *Lutra lutra*, dormouse *Muscardinus avellanarius*, badger *Meles meles* or reptiles within the Zol.
- 4.1.3.4 There are five records of a single bat species, common pipistrelle *Pipistrellus pipistrellus* within the Zol, none of which occur within the Site boundary. A summary of the data provided is shown in Table 4-4. Bats are provided legal protection through the Habitats Regulations and WCA with a number of species also listed as SPI.

Table 4-4 Summary of bat records within Zol

Species	No. of Records	Distance from Site	Most recent record
Common Pipistrelle	5	364m southeast	2022

- 4.1.3.5 There are 188 records of 12 species of notable birds, within the last 10 years, within the Zol. This includes two species listed on Schedule 1 of the WCA, 10 species listed on the Red List of BoCC¹⁸ and two species listed on the Amber List of BoCC. Table 4-5 summarises records of notable birds that are relevant to the Site.

¹⁸ Birds of Conservation Concern 5. Available at: [Birds of Conservation Concern | BTO - British Trust for Ornithology](#)

Table 4-5 Summary of notable bird records within Zol.

Species	No. of Records	Distance from Site (m)	Notable	Most recent record
Lesser Redpoll <i>Acanthis cabaret</i>	39	679 southwest	BoCC5*:Amber	2014
Kingfisher <i>Alcedo atthis</i>	2	990 southwest	BoCC5:Amber; BirdsDir:A1**; WCA1**	2022
Swift <i>Apus apus</i>	14	869 west	BoCC5:Red	2020
Yellowhammer <i>Emberiza citrinella</i>	1	579 north	BoCC5:Red	2014
Grey Wagtail <i>Motacilla cinerea</i>	22	679 southwest	BoCC5:Red	2017
Spotted Flycatcher	18	679 southwest	BoCC5:Red	2015
House Sparrow <i>Passer domesticus</i>	19	679 southwest	BoCC5:Red	2015
Woodcock <i>Scolopax rusticola</i>	6	679 southwest	BoCC5:Red	2019
Starling <i>Sturnus vulgaris</i>	7	679 southwest	BoCC5:Red; BirdsDir:A1	2015
Redwing <i>Turdus iliacus</i>	28	679 southwest	BoCC5:Red; BirdsDir:A1; WCA1	2019
Song Thrush <i>Turdus philomelos</i>	6	675 south	BoCC5:Red; BirdsDir:A1	2017
Mistle Thrush <i>Turdus viscivorus</i>	26	679 southwest	BoCC5:Red	2017

*Birds of Conservation Concern 5; ** Birds Directive Annex 1; ***Wildlife and Countryside Act 1981 (Schedule 1)

4.1.3.6 There are 17 records of three invertebrate species within the Zol from the past 10 years. Table 4-6 summarises records of notable invertebrates.

Table 4-6 Summary of notable invertebrate records within Zol

Species	No. of Records	Distance from Site	Notable	Most recent record
Stag Beetle <i>Lucanus cervus</i>	2	686 south	Hab&Spp Dir Anx 2* NERC Act Section 41** LPS***	2019
Small Copper <i>Lycaena phlaeas</i>	12	932 southwest	LPS	2021
Large Skipper <i>Ochlodes sylvanus</i>	3	990 southwest	LPS	2014

* Habitats and Species Directive Annex 2, ** Natural Environment and Rural Communities Act 2006 -Species of Principal Importance in England, ***London Priority Species

- 4.1.3.7 For notable flora the data search only returned records of large-leaved lime *Tilia platyphyllos*, a nationally scarce species. In total 89 records of this species were provided, the most recent record being from 2020, located 646m southeast.
- 4.1.3.8 There are five non-native invasive species within the ZOI, from the last 10 years. All of them are listed in the London Invasive Species Initiative (LISI). Species which may be relevant to the Site, included butterfly-bush *Buddleja davidii*, which has been historically recorded within the woodland along the railway line, 135m west of the Site in 2002 and most recently 820m east, within an industrial estate in 2016.

4.2 Previous Reports

- 4.2.1.1 A Phase 1 Habitat survey was undertaken in April 2020 and identified hardstanding, buildings and ephemeral vegetation as habitats recorded on-Site. The report noted that the site was dominated by hardstanding and buildings, which offered limited ecological value. The limited ephemeral vegetation present included small patches in areas along the north and west boundaries of the site and banquet hall.
- 4.2.1.2 To the south, butterfly-bush *Buddleja davidii*, was present although most of it had been cut back. Whilst not listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) as an invasive non-native species, butterfly-bush is listed in Category 3 of London's Invasive Species Initiative, which requires concerted, coordinated, and extensive action to control/eradicate.
- 4.2.1.3 All buildings on site were assessed externally for features with potential to support roosting bats. All buildings on-Site were in active use at the time of the survey with limited suitable roosting spaces for bats due to the good condition of the pitched roofs, flat roofs and roofing materials such as steel frames. The roosting opportunities were also limited by the constant use of buildings, night-time lighting, and streetlamps at roof level.
- 4.2.1.4 However, two features were identified during the survey: lifted render along the southern face of banqueting hall extension and a crack in the boundary wall opposite, on the southwestern boundary. Both features were considered to offer low potential to support roosting bats, given the railway line, 100m west, which is likely an important foraging and commuting corridor for bats.

- 4.2.1.5 A dusk survey, by Thomson Environmental Consultants¹⁹, was undertaken on 4th May 2021, in suitable weather conditions. No bats were recorded emerging or re-entering any of the PRFs of either building during the survey, and no bats were recorded commuting or foraging around the Site. It was noted during the survey that the entire survey area was illuminated by floodlights located off-Site.
- 4.2.1.6 No other protected, priority or notable species were identified during any of the surveys. Due to the highly urban nature of the site and the limited semi-natural habitats present, it is considered unlikely to support any other protected or priority species.

4.3 Site Survey

4.3.1 On-site habitats

- 4.3.1.1 **Figure 4-1** shows the extent of habitat types and boundary features. Descriptions of the habitat types and dominant plant species found at the Site are provided below. Habitat descriptions are by broad habitat type, as listed in the in 'Handbook for Phase 1 Habitat Survey – A Technique for Environmental Audit' (JNCC 2010). Target Notes (TNs) are listed within **Appendix 1** whilst photographs of the Site survey are in **Appendix 2**.
- 4.3.1.2 The PEA undertaken in 2021, identified hardstanding, buildings, and ephemeral vegetation present on-Site. The updated site visit in 2023, found the ephemeral vegetation in the north had been cut back, and small amounts were growing around the edges of the hardstanding parcel in the south, which included mainly dead spear thistle *Cirsium vulgare*.
- 4.3.1.3 The building complex comprised a row of shops along the A1010 High Road, which include a banqueting hall, nail salon and bridal shop, with flats above. These buildings are a mixture of two and three storeys, constructed from brick with a mixture of tile and pitched roofs. The banqueting hall extends out to the west comprising a brick structure with a pitched corrugated roof.
- 4.3.1.4 There is a small breezeblock constructed, electrical hut in the northwest corner, with a flat bitumen felt roof (TN1). This building was in poor condition with the roof being partially ripped open.

¹⁹ Thomson Environmental Consultants (2021) Bat Survey, Printworks Tottenham, Report Ref: OTOT101/001/002/001

Figure 4-1 Extended Phase 1 Habitat Plan



Imagery: @2023 Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The Geoinformation Group. Map Data: @2023 Google Maps

4.3.2 Off Site (adjacent habitats)

- 4.3.2.1 The Site is along the A1010 High Road, with further commercial and residential properties to the north, south and west. Approximately 135m west is a railway line, with woodland vegetation, creating a green corridor for local species.

4.3.3 Preliminary Roost Assessment (PRA)

- 4.3.3.1 All buildings on site were assessed externally for features with potential to support roosting bats. As per the survey undertaken in 2021, the buildings were in active use with limited suitable roosting opportunities for bats due to the good condition of the roofs.
- 4.3.3.2 The lifted render along the southern face of banqueting hall extension (TN2) where the feature had been identified in 2021 appeared to not be substantial enough to provide roosting opportunities. In addition, the crack in the boundary wall opposite (TN3), on the southwestern boundary, appeared to not be of any depth.
- 4.3.3.3 A gap within the wooden soffit, along the northern face of the banqueting hall extension was found, providing low suitability for roosting bats (TN4). However, due to the lack of suitable habitats on-Site and immediately surrounding, plus the high levels of security lighting attached to the building and within the adjacent industrial park, knowledge from previous surveys on high levels of illumination at night, it is unlikely that bats would be present as such, the building is classed as having negligible suitability.

4.3.4 Presence / potential presence of legally protected and notable species

- 4.3.4.1 No direct evidence of protected species was recorded during the visit.
- 4.3.4.2 The Site consists of habitats that are considered to have negligible value for biodiversity, and it is unlikely to support any protected species mentioned in Section 4.1.2 above.

4.3.5 Presence / potential presence of invasive non-native species

- 4.3.5.1 No invasive non-native species were recorded on the Site; however, small stands of butterfly-bush (TN5) were recorded growing along the wall in the west and south. This plant is listed in the LSI, as an invasive non-native Category 3 species of high impact or concern which are widespread in London and require concerted, coordinated, and extensive action to control/eradicate.

5 Embedded Environmental Measures

- 5.1.1.1 The Project has been designed to deliver a series of biodiversity enhancements within both the habitat management area and the proposed development. These include the following measures:
- Removal of butterfly-bush, a Category 3 species on the London's Invasive Species Initiative, which requires concerted, coordinated, and extensive action to control/eradicate.
 - Planting of native street trees (no. 18), creation of ornamental shrub planting and species-rich lawn within the footprint of the proposed development area.
- 5.1.1.2 The detailed design of the habitats to be created and details on their ongoing management will be provided in a Landscape and Ecological Management Plan (LEMP). The LEMP would be agreed as suitable with Haringey Council prior to commencement of site clearance and secured through a planning condition.
- 5.1.1.3 A Construction Environment Management Plan (CEMP) statement will be written and agreed with Haringey Council prior to Site clearance that will describe the pollution prevention measures, including with regards dust, chemical pollutants, noise and light, to be implemented during the construction phase. The CEMP would be agreed as suitable with Haringey Council prior to commencement of site clearance and secured through a planning condition.
- 5.1.1.4 In addition, the project is committed to delivering a BNG of at least 10%, as measured using Natural England's Biodiversity Metric 4.0 (see Appendix 3). Due to the lack of natural habitats on-Site prior to development, the proposed landscape design for the Site results in a large improvement for biodiversity.

6 Scope of the Assessment

6.1.1.1 The proposed scope of assessment for biodiversity is defined by the type of ecological features that occur within the area and the type of potential effects that could be realised by the construction and occupation of The Printworks. Following CIEEM (2018) guidance on EclA the importance of each ecological feature present has been determined and justified. The following categories have been used in this assessment:

- International / European
- National (UK / England)
- County (Greater London)
- Borough (Haringey)
- Local
- Negligible

6.1.1.2 Key to understanding the extent of potential effects on important ecological features is the determination of a ZoI²⁰ for each that reflects their sensitivity to environmental change. The ZoIs are tied to the type of effects that could occur due to a particular development. At The Printworks, the following effects have been considered:

- Permanent and temporary land take resulting in habitat loss / degradation
- Increased noise and light levels resulting in disturbance / displacement
- Pollution events resulting in degradation of habitats and direct toxicity to species (from dust liberation and chemical loss)
- Introduction or spread of invasive non-native species resulting in habitat change²¹.

6.1.1.3 The scope of the assessment is described in Table 6-1.

²⁰ At this stage the broad ZoI used to define the area for desk study are narrowed to reflect the baseline and a more detailed understanding of potential effects

²¹ This can be discounted from detailed assessment as no species controlled under Schedule 9 of the Wildlife & Countryside Act 1981 (as amended) have been recorded on-Site.

Table 6-1 **Scope of Assessment**

Ecological Feature	Zol	Zol justification	Importance	Importance justification	Scoped in / out of assessment
Epping Forest SAC	6.2km	The Interim Mitigation Strategy for Epping Forest Special Area of Conservation set a specific Zol (from the European site) of 6.2km that encompasses all residential development	International	Designated sites covered by legislation and/or convention	In
Lee Valley SPA / Ramsar site	5km	Standard Zol set for European sites	International	Designated sites covered by legislation and/or convention	Out – Natural England have identified risks to water supply and water pollution associated with large non-residential and commercial developments as potential sources of impact to these sites. Owing to the small size of the development, the urban location and the relative separation of the Site from these designated sites, the development is not considered likely to result in a significant adverse impact on the SPA/Ramsar and SSSI
On-Site Habitats	Within Site boundary	Common habitat that if lost to development would not alter the outcomes of other similar habitat in the wider area.	Negligible	Habitats on-Site are of negligible ecological value.	Out - small local losses of a common and widespread habitat are not material. Commitment to BNG ensures overall benefit to the biodiversity of the local area.
Butterfly-bush	Within Site boundary	Small patches present on-Site that are unlikely to directly	N/a	Invasive species which needs removing from Site due to	Out – removal will benefit the Site.

Ecological Feature	ZoI	ZoI justification	Importance	Importance justification	Scoped in / out of assessment
		affected the surrounding urban area.		being a species listed on the LISI.	

7 Significance Criteria

7.1 Magnitude of Impact

- 7.1.1.1 CIEEM (2018, updated 2022) defines a significant effect as one *‘that either supports or undermines biodiversity conservation objectives for ‘important ecological features’ or for biodiversity in general’*.
- 7.1.1.2 When considering likely significant effects on ecological features, whether these are negative or positive, the following characteristics of environmental change are taken into account:
- extent – the spatial or geographical area over which the environmental change may occur;
 - magnitude – the size, amount, intensity or volume of the environmental change;
 - duration – the length of time over which the environmental change may occur;
 - frequency – the number of times an environmental change may occur;
 - timing – the periods of the day / year / season during which an environmental change may occur; and
 - reversibility – whether the environmental change can be reversed through restoration actions or regeneration.
- 7.1.1.3 Both negative and positive effects are assessed as being significant if the favourable conservation status of an ecological feature would be altered as a result of the Proposed Development. Conservation status is defined in CIEEM 2018 (in paragraph 5.3.2) as follows:
- “habitats - conservation status is determined by the sum of the influences acting on the habitat that may affect its extent, structure and functions as well as its distribution and its typical species within a given geographical area”; and*
- ‘species - conservation status is determined by the sum of influences acting on the species concerned that may affect its abundance and distribution within a given geographical area’.*
- 7.1.1.4 Professional judgement has been used, in light of the available evidence, to determine whether the conservation status of an ecological feature will be altered either negatively or positively.
- 7.1.1.5 When considering designated sites it is their integrity that is considered. This is defined as *“the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified.”*
- 7.1.1.6 The assessment of effects on integrity will draw upon the assessment of effects on the conservation status of the features for which the site has been designated.

- 7.1.1.7 Where likely adverse effects are identified, environmental measures, including mitigation, have been incorporated into the project where practicable (Section 5).

8 Assessment of Potential Effects

- 8.1.1.1 The evaluation in this section is based on the baseline information presented above, review of design proposals, consultation with the design team, knowledge of likely construction practices to be employed, and reasonable assumptions regarding operation.
- 8.1.1.2 For purposes of the assessment, it is assumed there has been no change in the condition of the Site since the Site surveys (unless otherwise stated).

8.2 Epping Forest SAC

- 8.2.1.1 A Habitats Regulations Assessment (HRA) for alterations to the Strategic Policies and Tottenham Area Action Plan (AECOM, 2015) ²² was undertaken and identified London Borough of Haringey to fall within the 3 - 6.2km visitor ZOI of Epping Forest SAC. Epping Forest SAC lies approximately 4.8km east of the Site, and given this distance, the only potential impact is likely to be as a result of increased recreational pressure. The 2015 HRA concluded that the Tottenham Area Action Plan will not result in a likely significant effect on any European sites, either alone or in combination with other projects.
- 8.2.1.2 Survey data published within the Epping Forest Visitor Survey (2017) ²³ shows that visitor numbers to the SAC from London Borough of Haringey (LBH) are significantly less than other Boroughs and local authorities within the ZOI. Overall, out of the 11 boroughs, just 1% of recorded visitors come from LBH, and at a maximum frequency of 2-3 times a month. The Borough does not lie within the core 0-3km catchment ZOI and the recorded data indicates that LBH lies outside of the actual 75th percentile area, and much closer to the 95th percentile margin.
- 8.2.1.3 Natural England released an Interim Guidance Note ²⁴ to a number of authorities that fall within the identified visitor zone of influence buffer from the Epping Forest SAC. Paragraph 25 states, *'The above demonstrates that the vast majority of visitors arise from within the three local authority areas of Epping Forest District and the London Boroughs of Waltham Forest and Redbridge, which are also the competent authorities under the Habitats*

²² AECOM (2015) Habitat Regulations Assessment Screening Report – Alterations to Haringey's Strategic Policies.

²³ Liley, D., Panter, C., Weitowitz, D., and Saunders, G. (2018). Epping Forest Visitor Survey 2017. Unpublished report by Footprint Ecology for the City of London Corporation as Conservators of Epping Forest.

²⁴ Appendix 1 – Interim Mitigation Strategy for Epping Forest Special Area of Conservation. (2018). Interim Approach to Managing Recreational Pressures on the Epping Forest Special Area of Conservation. Version 5, October 2018.

Regulations 2017. Visitors arising from the other local authority areas are significantly less and, for the main part, visit on a less frequent basis.'

- 8.2.1.4 The table being described included the overall analysis of the percentage of visitors arising from each local authority administrative area in order to understand where the greatest pressure is likely to arise from. LBH was not one of nine authorities included. Due to the limited potential for new residents of Haringey to contribute to recreational pressure the interim approach does not seek mitigation payments from development within LBH
- 8.2.1.5 In addition, the nature of the proposed residential development is for student accommodation. Students are generally less likely to own cars compared to other demographics, due to limited financial resources, proximity to university and the availability of alternative transport options such as walking, cycling or public transport.
- 8.2.1.6 The proposed landscaping at the Site is likely to reduce the potential risks to the SAC further by providing areas of greenspace locally to residents.
- 8.2.1.7 Overall, it is considered that no direct or indirect significant adverse effects on Epping Forest SAC are expected as a result of the proposed development.

9 Conclusion

- 9.1.1.1 Logika consultants carried out an 'extended' Phase 1 habitat assessment on the Site at The Printworks, High Road West. The habitats present on Site were of negligible ecological importance and the green infrastructure proposed, native street trees, ornamental shrub planting, natural lawn, green roof, and planters will enhance the biodiversity of the Site.
- 9.1.1.2 The potential recreational disturbance to Epping Forest SAC can be discounted due to the nature, location and size of the proposed development and as such, no significant effects are anticipated.

A1 Target Note

Target Note Reference (TN)	Description
1	Small electrical hut, constructed from breezeblocks with a flat, poor condition, bitumen felt roof, present in the northwest.
2	Lifted render along the southern face of the southern boundary which was assessed as having low potential in 2021.
3	Crack within boundary wall along the southern boundary, which was assessed as having low potential in 2021.
4	A gap within the wooden soffit board along the northern face of the banqueting hall, recorded in 2023.
5	Stands of butterfly-bush.

A2 Photographs

Description	Photograph
Southern face of banqueting hall, including cracked render, identified as a potential feature in 2021.	
Brick wall, along southern boundary, with a gap identified as a potential feature in 2021.	

Description

Photograph

Eastern view of the buildings along the A1010 High Road.



Rear view of the building along the A1010 High Road.



Northern face of the banqueting hall.



Description	Photograph
Gap within wooden soffit board on the northern face of the banqueting hall.	
Electrical hut in northwest corner.	
Stand of butterfly-bush in the south of the Site.	

Description	Photograph
Small stand of butterfly-bush growing along the western boundary of the Site.	

A3 Biodiversity Net Gain

- 9.1.1.4 The Small Sites Metric 4.0 is a tool created by Natural England to assess an area's baseline value to biodiversity, and then to compare that to the post-development value of the same site. This is done by identifying and describing habitats, and then assigning them value based on their size, "distinctiveness", "condition", and "strategic significance".

A3.1 Results - Baseline

- 9.1.1.5 Table 5-1 provides a breakdown of the information within the Small Site's Biodiversity Metric 4.0 for baseline habitats, measured in m2.

Table 5-1 Biodiversity Net Gain Baseline – area-based habitats

Habitat	Condition	Extent (m2)	Habitat units
Sealed surface (hardstanding and building)	N/A	3598	0.00
Total		3598	0.00

- 9.1.1.6 The calculation tool returned the following headline result for the on-Site baseline:
- Habitat units: 0.00
- 9.1.1.7 There are no baseline linear habitats.
- 9.1.1.8 Although there is a small amount of scattered shrub on-Site, it is of such a small size that it does not register within the metric.

A3.2 Results – Post-Development

- 9.1.1.9 As the time of this report, a detailed planting plan and landscape plan have not been developed. Areas have been provided by the landscape architect and conditions assumed using the Planting Strategy²⁵.
- 9.1.1.10 Table 5-2 provides a breakdown of the information within the Small Site's Metric 4.0 for post-development habitats, measured in m2.

²⁵ Re-Form Landscape Architecture (2023) Landscaping Strategy, Ref: 1002-RFM-XX-00-DR-L-0004

Table 5-1 Biodiversity Net Gain Post-Development – area-based habitats

Habitat	Condition	Extent (m2)	Habitat units
Sealed surface (hardstanding and building)	N/A	2640	0.00
Urban tree	Moderate	610.42*	0.1866
Introduced shrub (Ornamental shrub planting)	N/A	103	0.0199
Intensive green roof	Moderate	668	0.1609
Natural lawn	Moderate	25	0.0087
Ground level planters	N/A	162	0.0313
Total		3598	0.4073

*As trees do not provide a groundcover area, their areas are not included in the total within this table, meaning that the total areas presented remain the same as the area of the Site

- 9.1.1.11 The calculation tool returned the following headline result for the post-development landscaping:
- Habitat units: 0.4073
- 9.1.1.12 This increase in habitat units is attained through new urban tree planting and creation of ornamental shrub planting, natural lawn, intensive green roof and planters within the ground floor and roof terrace.
- 9.1.1.13 There are no linear habitats, post development.
- 9.1.1.14 Due to the Site comprising 0 habitat units prior to development, it is not possible to give a real percentage. However, the proposed landscape design for the Site undoubtedly results in an improvement for biodiversity in the local area.
- 9.1.1.15 A completed copy of the calculation tool is provided alongside this report.