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EXECUTIVE SUMMARY

National grid commissioned RSK Biocensus to prepare a Habitats Regulations Assessment (HRA) Screening Report in relation to a proposed development at Tottenham Substation. Works are to be undertaken between September 2025 and February 2026.

This report considers the likelihood that the project will result in significant effects on internationally important sites designated for their nature conservation interests. There are three Habitat sites have been identified within 5 km of the proposed development which are;

- Lee Valley Special Protection Area (SPA);
- Lee Valley Ramsar
- Epping Forest Special Area of Conservation (SAC).

The following potential likely significant impacts have been considered and screened out of having a 'likely significant effect' in the screening assessment:

- Disturbance / Displacement of birds associated within the Lee Valley Ramsar and SPA.
- Changes in water quality within the Lee Valley Ramsar and SPA.
- Air Pollution within the Lee Valley Ramsar and SPA.

Significant impacts on Epping Forest SAC have been screened out during this process as there is no likely significant effect due to the proposed works (alone and in combination) as a result of the distance between Epping Forest SAC and the works. Significant effects on bird activity and air quality at the Lee Valley SPA and Ramsar are also screened out.

On completion of the screening, it has been concluded that there is potential for likely significant effects (alone and in combination) in relation to changes in water quality. An Appropriate Assessment (Stage 2) of the potential impacts is recommended.

If a CEMP is produced that will negate the significant effects (alone and in combination) in relation to changes of water quality, the appropriate assessment (stage 2) of potential impacts will not be required.

1 INTRODUCTION

1.1 Purpose of this report

- 1.1.1 This Habitats Regulations Assessment (HRA) screening technical note has been produced by RSK Biocensus on behalf of National Grid in order to accompany an Application for Planning Permission for a development at Tottenham Substation in Tottenham, Enfield.
- 1.1.2 The development proposals include two options;
- Option 1:
Demolition of the existing building and replacement with modular buildings (toilet and changing facilities) along with associated infrastructure modifications and redirection of existing services. This option is referred to as the 'proposed development'.
 - Option 2:
Replacement of the existing roof and potential internal upgrades such as; Windows, wall insulations and doors. Due to the limited extent of these works, no likely significant effects to Habitat Sites will occur and therefore the following screening assessment refers only to Option 1.
- 1.1.3 This HRA Screening Report has been prepared to accompany an Application for Planning Permission for National Grid. RSK Biocensus have been instructed to prepare this report to identify the requirement for an Appropriate Assessment (AA). If an AA is required, it will then need to be provided to the Local Planning Authority, as the competent authority, to enable them to carry out the Habitats Regulations Assessment on the Tottenham Substation project.
- 1.1.4 An Ecological Constraints Walkover report comprising a background data search (BDS) and an extended UKHab Habitat survey was completed by RSK Biocensus in April 2025¹. The report identified the need for a HRA screening assessment, and made a range of other recommendations in relation to designated sites, protected species and priority habitats and species.
- 1.1.5 This report provides the findings of an HRA screening (stage 1 of the HRA process) of whether the proposals are likely to have a significant effect on the conservation objectives of designated sites.
- 1.1.6 Documents relating to the relevant designated sites, in addition to the Preliminary Ecological Assessment (PEA) report and construction information provided by the client, have been used for this screening report. Documents used are;
- Tottenham substation initial traffic assessment Report, COWI. May 2025.
 - Tottenham project plan New offices_1 draft, National Grid. June 2025.

1.2 The Site

- 1.2.1 The red line boundary for the proposed development is shown on Figure 1, hereafter referred to as 'the site'.
- 1.2.2 The site is Tottenham 275kV Substation, Watermead Way, Tottenham, London, N17 0UN (Central OS grid reference: TQ 35183 91282). It comprises two sections of the operational electricity substation and non-operational land located between the operational sections. The surrounding land largely comprises areas of mixed scrub, with a lowland deciduous woodland strip and a few patches of other neutral grassland.
- 1.2.3 This assessment has been informed by a site visit which was conducted in April 2025 and subsequent Preliminary Ecological Assessment (PEA), Preliminary Roost Assessment (PRA) report (RSK Biocensus, 2025).

1.3 Landscape Context

- 1.3.1 The site is located within an industrialised area of Tottenham, London, and is surrounded by hardstanding and utility infrastructure. Situated to the east of Tottenham substation, is Wild Marsh East, an area of open mosaic habitats and species-rich grassland adjacent to the River Lea and Banbury reservoir. The broader landscape includes extensive urban development, infrastructure corridors, and open waterbodies associated with the Lee Valley corridor, which support a rich diversity of wildlife, particularly in its extensive wetlands, river systems, grasslands and woodlands. It provides a vital 'green corridor' through an urban environment .

1.4 Proposed Project plan

- 1.4.1 The proposed project plan for Option 1 is outlined in the plan of works (250604_Tottenham New Offices_L1 draft.PoW). This will involve approximately 109 days of work between September 2025 and February 2026.
- 1.4.2 The project plan involves the following stages: site investigation, setup of compound, isolation of existing services, alterations to existing services, demolition and disposal of existing offices, ground preparation and installation of foundations, installation of new modular building, creating external areas, testing and commissioning and demobilisation.

2 METHODOLOGY

2.1 Legislative and policy context for HRA

- 2.1.1 The Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the 'Habitats Directive') provides legal protection for habitats and species of European importance. Articles 3 to 9 provide the legislative means to protect habitats and species of Community interest. Since leaving the European Union (EU) in December 2020, the requirements of the Habitats Directive have been transposed into English law by means of:
- The European Union (Withdrawal) Act 2018 (as amended by the European Union (Withdrawal Agreement) Act 2020); and
 - The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.
- 2.1.2 These pieces of legislation ensure continued compliance with all existing HRA legislation and case law relevant to the operation of the Habitats Regulations (as amended in the UK).
- 2.1.3 Under the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) and Conservation of Habitats and Species Regulations 2017 (more commonly referred to as the 'Habitats Regulations'), a network of sites was designated across the UK and the surrounding marine environment for the purposes of nature conservation. These sites were known as Natura 2000 sites and they formed a network of areas designated to conserve natural habitats and species that are rare, endangered, vulnerable or endemic within the European Community. This included Special Areas of Conservation (SACs) (designated under the Habitats Directive) and Special Protection Areas (SPAs) (classified under Directive 2009/147/EC on the Conservation of Wild Birds; the 'Birds Directive'). In the UK, Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) which were part of the Natura 2000 network before the UK left the EU, now form part of the UK 'National Site Network'. However, the premise of the protection of these sites remains the same. SACs are designated for the protection of habitats and non-avian animal species of conservation concern. SPAs are designated to protect rare or vulnerable species of bird, as well as all regularly occurring migratory bird species.
- 2.1.4 As a matter of UK Government policy, outlined in the National Planning Policy Framework (Ministry of Housing Communities & Local Government, 2024), HRA also needs to include consideration of Wetlands of International Importance, designated under the 1971 Ramsar Convention, more commonly known as 'Ramsar sites', and proposed Ramsar sites. For the purposes of this report, any sites that would need to be considered as part of the HRA assessment (as detailed in paragraph 2.1.33), is referred to as a "Habitats site".
- 2.1.5 In addition to the Habitats sites, and any sites identified, or required, as compensatory measures for adverse effects on habitats sites, will also be considered in accordance with the National Planning Policy Framework (Ministry of Housing Communities & Local Government, 2024).

- 2.1.6 Any plan or project which is not directly connected with or necessary to the conservation of a Habitats Site, and which is likely to have a significant effect on such a site, must be subject to a screening of the implications for the conservation objectives of that site. The whole process of such assessment is known as a Habitats Regulations Assessment. Generally, such plans or projects may only be approved if the 'competent authority' has ascertained, by means of a Habitats Regulations Assessment, that there will be no adverse effect on the integrity of the Habitat site(s).

2.2 HRA Guidance

- 2.2.1 This screening report has been undertaken in accordance with the following guidance:
- European Commission, Directorate-General for Environment, *Assessment of plans and projects significantly affecting Natura 2000 sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC* – November 2001, Publications Office, 2002.
 - European Commission, Directorate-General for Environment, *Guidance document on assessment of plans and projects in relation to Natura 2000 sites – A summary*, Publications Office of the European Union, 2022.
 - UK Government. *Habitats regulations assessments: protecting a European site. How a competent authority must decide if a plan or project proposal that affects a European site can go ahead*. Published 24th February 2021. Last updated 6th December 2023. [accessed online 30/05/25] Website: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>
 - Tyldesley, D., and Chapman C., (2013) *The Habitats Regulations Assessment Handbook*. July 2024 edition UK: DTA Publications Limited.

2.3 HRA Stages

- 2.3.1 The aim of an HRA is to determine, in view of a Habitats site's conservation objectives and qualifying features, whether a project (either alone and/or in combination), would have a significant adverse effect on the Habitats site. The four distinct stages of the HRA process are summarised below:
- 2.3.2 **Stage 1 Screening:** is the first stage of the process and identifies the likely impacts upon a Habitat site of a project (either alone or in-combination). Following the 'Eco Advocacy CLG judgement' in 2023 (Ref. 2), measures that may mitigate a harmful effect on a protected site may be taken into account at the screening stage, where those measures would have been incorporated into the project design as standard features irrespective of any effect on the protected site concerned. As per the HRA handbook (Ref. 3 Tyldesley, D, and Chapman, C, 2013), these measures can be referred to as 'standard or essential features and characteristics of the project'. These 'standard or essential features and characteristics of the project' are those which are inherent in the project, or integral to the design/ physical characteristics of the project which are essential in defining its nature, scale, location, timing, frequency or duration. This includes actions that will be undertaken to meet other existing legislative requirements, and/ or actions that are considered to be standard practices used to

manage commonly occurring environmental effects. If the screening exercise concludes that likely significant effects cannot be ruled out, then Appropriate Assessment (stage 2 of the process) must be undertaken. It is important to note that the burden of evidence is to demonstrate, on the basis of objective information, that there will be no significant effect; if the effect may be significant, or is not known, that would trigger the need for an Appropriate Assessment.

- 2.3.3 **Stage 2 Appropriate Assessment:** looks at the implications of the effects of the proposals for the site's conservation objectives (alone and in-combination). At this stage, it needs to be determined, beyond reasonable scientific doubt, whether or not there will be adverse effects on the integrity of the site. This stage also includes the development of mitigation measures to avoid or reduce any possible impacts.
- 2.3.4 **Stage 3 Assessment of alternative solutions:** is the process which examines alternative ways of achieving the objectives of the project that would avoid adverse impacts on the integrity of a Habitat site, should the avoidance or mitigation measures detailed at the Appropriate Assessment stage be insufficient to cancel out adverse effects.
- 2.3.5 **Stage 4 Assessment where no alternative solutions exist and where adverse impacts remain:** an assessment is made as to whether or not the development is necessary for Imperative Reasons of Overriding Public Interest (IROPI). If it is, this stage also involves detailed assessment of the compensatory measures needed to protect and maintain the overall coherence of the Natura 2000 network.

2.4 In-combination effects

- 2.4.1 The Habitats Regulations also require consideration of the potential for in-combination effect with other plans or projects.

2.5 Mitigation

- 2.5.1 As noted above, following the 'Eco Advocacy CLG judgement' in 2023, measures that may inadvertently mitigate a harmful effect on a Habitat site, may be able to be taken into account at the screening stage. These features may incidentally have the effect of avoiding or reducing some or all of the potentially adverse effects of a proposal on a Habitat site but is not their specific intention (Ref. 2). These mitigation measures have been taken into consideration in the screening assessment in Section 3.
- 2.5.2 On the authority of the 'People over Wind' judgement in 2018, specific mitigation measures which are intended to avoid/ reduce harmful effects of the project on Habitat sites, cannot be taken into consideration at the screening stage (Ref. 2). In this instance, no such measures were required.

3 HRA SCREENING (STAGE 1) ASSESSMENT

3.1 Screening requirement

- 3.1.1 Screening is the process that addresses and records the reasoning and conclusions in relation to the first two tests of Article 6(3) of the Habitats Regulations, that is:
- whether a plan or project is directly connected to or necessary for the management of the site; and
 - whether a plan or project, alone or in-combination with other plans and projects, is likely to have significant effects on a Habitat site in view of its conservation objectives.
- 3.1.2 Under the first test, the purpose of the proposed works is not directly connected with or necessary to the management of a Habitat Site. Therefore, the second test needs to be met.

3.2 Habitat Sites

- 3.2.1 The zone of influence (Zoi) of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the qualifying features of a Habitat site.
- 3.2.2 The site is situated in an existing urban industrial area within North London. The proposals include short term construction within a small area of the site. Therefore, noise, air and water pollution generated by the works will not be raised above the background level associated with the area beyond 5 km. As such, a Zoi of 5 km from the site boundary has been used to identify Habitat sites potentially impacted by the proposed works. These are summarised in Table 1.
- 3.2.3 The qualifying features for each Habitat Site in addition to their distance from the site are shown in Table 1.
- 3.2.4 The site does not have any of the habitat type listed in Table 1 and are shown in Figure 2.

Lee Valley SPA/Ramsar

- 3.2.5 Lee Valley SPA and Ramsar is an area of manmade and semi-natural wetlands surrounding a series of embanked water supply reservoirs, gravel pits and sewage treatment lagoons.
- 3.2.6 Lee Valley SPA is designated for supporting wintering birds: bittern (*Botaurus stellaris*), shoveler (*Anas clypeata*) and gadwall (*Anas strepera*). Lee Valley Ramsar is also designated for its wintering shoveler and gadwall populations, in addition to supporting the plant Whorled Water-milfoil (*Myriophyllum verticillatum*) and a species of water boatman (*Micronecta minutissima*). Both Lee Valley Ramsar and SPA are located 430 m south of the site.
- 3.2.7 The BDS returned one record of bittern, 37 records of gadwall and 28 records of shoveler within 1 km of the site, however the exact locations of these records are unknown as only two and four-figure grid references (10km² and 1km² respectively)

have been provided. No records were returned for Whorled Water-milfoil or *Micronecta minutissima*.

- 3.2.8 The potential impacts to qualifying species associated with Lee Valley SPA/Ramsar as a result of the construction phase of the proposed development have been identified and outlined in Table 2.

Epping Forest SAC

- 3.2.9 Epping Forest SAC is a wood-pasture with ancient semi-natural woodland, old grassland plains, wet and dry heathland and scattered wetland. It is designated for these habitats, alongside a range of rare epiphytes and bryophytes including the moss *Zygodon forsteri*. It is additionally designated for widespread and frequent records of stag beetle (*Lucanus cervus*) and records of great crested newt (*Triturus cristatus*).
- 3.2.10 The potential impacts to qualifying species associated with Epping Forest SAC as a result of the construction phase of the proposed development have been identified and outlined in Table 1.

3.3 Identification of Potential Impacts

- 3.3.1 Table 1 outlines the identified threats and pressures to each Habitat Site.

Table 1. Summary of the qualifying features, threats/pressures and approximate distance and direction of Habitat Sites with 5 km of the proposed project

Habitats sites	Qualifying features	Qualifying threats and pressures	Approximate distance/direction from proposed development
Lee Valley SPA	The site is regularly used by 1% or more of the Great Britain population of the following species listed in Annex I in any season: • Bittern (<i>Botaurus stellaris</i>) - wintering The site is regularly used by 1% or more of the biogeographical populations of the following regularly occurring migratory species (other than those listed in Annex I) in any season: • Shoveler (<i>Anas clypeata</i>) - wintering • Gadwall (<i>Anas strepera</i>) - wintering (Ref. 4)	• Disturbance to wintering birds (bittern, shoveler, gadwall) • Air pollution • Water pollution and/or siltation • Recreational pressure • Habitat management	c. 430 m south
Lee Valley Ramsar	The site qualifies under criterion 2 for supporting vulnerable, endangered or critically endangered species or ecological communities: • Nationally scarce plant Whorled Water-milfoil (<i>Myriophyllum verticillatum</i>) • Rare or vulnerable invertebrate species <i>Micronecta minutissima</i> (a water boatman) The site qualifies under criterion 6 for regularly supporting 1% of the individuals in a population of one species or subspecies of waterbird: • Shoveler (<i>Anas clypeata</i>) - wintering • Gadwall (<i>Anas strepera</i>) - wintering (Ref. 5)	• Eutrophication • Disturbance to wintering birds (bittern shoveler, gadwall) • Air pollution • Water pollution and/or siltation • Recreational pressure • Habitat management	c. 430 m south

Habitats sites	Qualifying features	Qualifying threats and pressures	Approximate distance/direction from proposed development
Epping Forest SAC	The site is designated as it hosts the following habitats listed in Annex I: • Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>). (Beech forests on acid soils) • European dry heaths • Northern Atlantic wet heaths with <i>Erica tetralix</i>. (Wet heathland with cross-leaved heath) The site is designated as it hosts the following habitats listed in Annex II: • Stag beetle <i>Luncaus cervus</i> • Great crested newt <i>Triturus cristatus</i> (Ref. 6)	• Air pollution • Water pollution and/or siltation • Recreational pressure	c. 3500 m east

3.4 Assessment of potential impacts

Eutrophication

- 3.4.1 Sewage, dust generated from demolition, air pollution and recreational pressure are the pathways for impacts of eutrophication at the Habitats Sites.
- 3.4.2 Sewage is not in control of the site and is determined by the management of Haringey council. No additional effluence will be generated from the current baseline of the site as it is expected to be used regularly by the same number of people as the currently existing site.
- 3.4.3 Following the screening criteria outlined in IAQM guidance (Ref. 9) Potential eutrophication due to dust produced by the demolition of the onsite buildings is limited to a maximum of 250 m from the site entrance and 50 m from the routes used by construction vehicles on the public highway. This project falls outside of the 250 m buffer for the site location and a Journey Management Plan for vehicle movements will restrict movement of vehicles to areas outside of the 50 m Zol. A Journey Management Plan is considered to be standard practice to manage commonly occurring environmental effects.
- 3.4.4 Air pollution and recreational pressure are assessed below in 3.4.7 – 3.4.14.

Disturbance/displacement of qualifying species i.e. wintering birds

- 3.4.5 If wintering bittern, gadwall and/or shoveler are present within nearby waterbodies/watercourses (i.e. River Lee Navigation) the proposed development has the potential to cause disturbance as a result of increased noise, vibration, lighting and visual disturbance. All three bird species are qualifying species of Lee Valley SPA/Ramsar during the wintering season (October to March inclusive).
- 3.4.6 Research suggests that gadwall and shoveler have medium sensitivity to disturbance and during the non-breeding season, a 100-200m buffer should be maintained from potential sources of disturbance (Ref. 7). No specific information could be found on recommended non-breeding disturbance buffers for bittern – however the closest habitats suitable for bittern (well vegetated wetlands and reedbeds) are over 1.5 km from the site, which is above the highest non-breeding disturbance distance of any bird species noted within the NatureScot literature review. Given that the site and adjacent habitats are subject to existing levels of disturbance as a result of the surrounding industrial estate and there is no suitable non-breeding habitat on site, it is likely that there will be no disturbance to non-breeding bittern, gadwell and shoveler due of the project and hence no likely significant effects.

Water pollution Changes to water quality

- 3.4.7 The River Lee Navigation lies c. 160 m east of the site and runs along the boundary of Lee Valley SPA/Ramsar. A watercourse connected to the River Lee Navigation (Pymmes Brook) runs adjacent to the site. It is connected hydrologically with the River Lee and associated wetland habitats approximately 200 m downstream of the point closest to the proposed works area. In the absence of mitigation, there is a risk of pollution entering the River Lee Navigation during the works and impacting Lee Valley SPA/Ramsar by causing damage to the wetlands through siltation, pollutants and

eutrophication. Impacts may be caused by contaminated surface water run off entering storm drains which outflow into Pymmes Brook, or flowing directly into Pymmes Brook.

3.4.8 However, changes to the quality of surface water runoff can be managed, and effects can be mitigated, by the implementation of a detailed and specific Construction Environmental Management Plan (CEMP) with a key aim being to control the pollution of surface water and wastewater on site during construction. This would be considered a standard and essential feature of a project of this kind and essential in defining its nature, scale, location, timing, frequency and duration. A CEMP including measures to manage water quality is considered to be standard practice to manage commonly occurring environmental effects.

3.4.9 Measures within the CEMP should include (but not limited too):

- The use of a temporary drainage system to channel contaminated runoff or from surface waters;
- Installation of sediment controls (such as silt fences and/or earth banks);
- Wastewater treatment facilities on site where required;
- Treatment of wastewater before any discharges occur;
- Chemicals (including fuels and oils) to be stored in appropriately bunded containers with correct labelling;
- Any chemicals not to be stored near a watercourse;
- Drip trays or 'plant nappies' to be used for refuelling and spill kits readily available with each machine around site;
- Vegetation to be removed from site must be done in a phased way and;
- Proposed planting across site to be undertaken as soon as possible to encourage early establishment.

3.4.10 One way a CEMP can tackle the constraints surrounding contaminated water and surface run-off is by installing a wildlife friendly SuDS Pond. This can be designed and monitored to ensure all surface run off is intercepted and cleaned before entering the River. If the CEMP is produced that has measures as the example above mentioned, then the water pollution and quality threats can be screened out.

Air Pollution

3.4.11 The Air Pollution Mitigation Strategy for Epping Forest SAC may be impacted by any increase in vehicle traffic within the District (Ref. 8). Sensitive areas within Epping Forest District will be avoided through the use of a Journey Management Plan for vehicle movements, considered to be standard practice to manage commonly occurring environmental effects.

3.4.12 Information provided by National grid explains that the traffic during construction will likely be no more than 20 HGV AADT and 50 AADT, which is in tolerance of thresholds stated in (Ref. 4) which explains that increases of traffic flows by at least 1,000 AADT or 220 HGV AADT, or less than 1% (alone or in combination on roads within 200m of the sites). Roads used by this project within 200 m of the Habitat sites are: Watermead Way – for which the most recent assessment of AADT was 29250 of which 8% were HGV (Ref.10). Vehicle movements associated with this project would therefore make up less

than 0.24% of the total traffic during construction. It is therefore concluded that the vehicle movements associated with the project will have no measurable impact on the emissions associated with this road and therefore no likely significant effects.

- 3.4.13 As discussed in paragraph 3.4.3 in relation to Eutrophication, the screening criteria outlined in IAQM guidance (Ref. 9) reduces the Zol of potential air pollution from dust created as a result of the demolition to 250, and as a result of traffic movements to 50m. The project site falls further than 250 m from the Habitats Sites, and a Journey Management Plan for vehicle movements will restrict movement of vehicles to areas outside of the 50 m Zol.

- 3.4.14 There will be no increase in the number of vehicles attending the site regularly.

Recreational Pressure

- 3.4.15 Recreational pressure has been identified as a risk to all Habitat sites within 5 km, with the largest Zol identified as Epping Forest SAC, wherein the majority of visitors to the site fell within a 6.2km radius of the site.

- 3.4.16 The Tottenham substation project will not create an impact through recreational use as the site is expected to be used regularly by the same number of people as the currently existing site, and no additional accommodation or housing is being created.

- 3.4.17 As there are no pathways for this impact and as such, it is not considered further.

Habitat management

- 3.4.18 The Tottenham substation will not impact the management of the Habitat sites. The habitats on site are unsuitable for assemblages of the birds, insects or plant species designated for Epping Forest and Lee Valley SAC, SPA or Ramsar. There will therefore be no loss or degradation of functionally linked land as a result of the proposals and hence no likely significant effects.

- 3.4.19 As there are no pathways for this impact, it is not considered further.

3.5 Cumulative assessment

- 3.5.1 There are multiple projects known projects within the local area which could result in a significant effect on the designated sites in combination with the proposed Tottenham substation development.

- 3.5.2 Some of the major projects include;

- Seven Sisters Regeneration – Planning Ref: HGY/2024/2260
- Tottenham Hotspur FC stadium development - Planning Ref: HGY/2015/3000
- Tottenham Regeneration – Planning ref: HGY/2018/0187

- 3.5.3 The combination effects of the above mentioned, multi-phased projects have been considered for this assessment and are detailed out below.

Eutrophication

- 3.5.4 Due to no overall net change in sewage output and the buffers for demolition from the site entrances and work routes, Tottenham substation will have no cumulative effect.

Disturbance

- 3.5.5 Tottenham substation is far enough away from any of the breeding qualifying species to exceed the buffer zones. With no risk of disturbance, this potential effect can be scoped out.
- 3.5.6 **Water pollution / changes to water quality**
- 3.5.7 Epping Forest SAC has been identified as being at risk from “inappropriate water levels and water pollution”, in the Enfield HRA. However, Epping Forest is far enough from site, with various water courses between site and Epping Forest, for water pollution to be very unlikely to arise as a result of the development.
- 3.5.8 Lee Valley SPA and RAMSAR lies between the site and Epping Forest. Any site surface run off has a high chance of entering the River Lee or the surrounding tributaries. This will only be relevant during construction; post construction has no change in water quality or output.
- 3.5.9 If a CEMP with the plans to produce a wildlife friendly SUDs Pond can be installed, designed and monitored to ensure all surface run off is intercepted and cleaned before entering the River, then the water pollution and quality threats can be screened out.
- 3.5.10 **Air Pollution**
- 3.5.11 Screening against IAQM air pollution criteria has been taken, resulting in the air quality screening thresholds potentially exceeding the Local Plan on roads near to Epping Forest SAC, however, the local A roads will be producing a higher level of traffic and therefore, pollution than any change made by this project. The screening process has identified likely significant effects in combination with other local projects at both Lee Valley SPA and RAMSAR, and Epping Forest SAC.
- 3.5.12 **Recreation Use**
- 3.5.13 There will be no net change in population; the same number of people will use the site post construction, therefore, recreational use can be scoped out.
- 3.5.14 **Habitat Management**
- 3.5.15 All works will be on the Tottenham substation, with no works changing the management of the surrounding habitats. Habitat management can be scoped out.

4 SCREENING CONCLUSION

- 4.1.1 The screening assessment has concluded that the potential for likely significant effects (alone and in combination) on Epping Forest SAC can be ruled out.
- 4.1.2 All possible significant effects on Lee Valley SPA & Ramsar site can be managed through standard environmental management practices as described above. Although air and water quality impacts cannot be screened out at this stage, it is very likely to be possible to demonstrate how the potential impacts can be reduced and managed in such a way that avoids all likely significant effects in a CEMP and Journey Management Plan (JMP), with detailed and specific measures aimed to control air and water pollution. This will then enable all impacts on these sites to be screened out.

Table 2: Screening conclusions

Habitats sites	Qualifying threats and pressures	Summary of the screening process	Screened In/ Screened Out
Lee Valley SPA and Lee Valley RAMSAR	Disturbance to wintering birds (bittern, shoveler, gadwall)	Epping Forest does not host any qualifying species and therefore can be screened out. Lee Valley supports Bittern which have breeding sites far enough away for no impacts to be caused. Gadwall and Shoveler need 100 to 200 metre buffers from any form of disturbance, which can be maintained. Due to Tottenham substation being 430 metres away from any site, and the buffers being 100 to 200 metres, this project will create no disturbance to any of the qualifying species.	Screened out
Lee Valley Ramsar	Eutrophication	As a result of Tottenham substation not having a change in number of people working here, sewage output will remain the same. The site is outside of the 250m buffer from the ZoL, and therefore dust as a result of demolition will be limited. Vehicle movements will require management to avoid the 50m buffer. However, a JMP for vehicle movements will restrict movement of vehicles to areas outside of the 50 m ZoL.	Screened out, subject to JMP

Habitats sites	Qualifying threats and pressures	Summary of the screening process	Screened In/ Screened Out
Lee Valley SPA, Lee Valley RAMSAR and Epping Forest SAC	Air pollution	Air pollution caused by traffic and dust particles released through demolition of the buildings have been checked. The increase in AADV will not exceed the Enfield HRA but does exceed the Epping Forest HRA. However, the major A roads will be producing a higher level of pollution than the increase in traffic caused by the Tottenham works.	Screened out, subject to JMP
Lee Valley SPA, Lee Valley RAMSAR and Epping Forest SAC	Water pollution and/or siltation	Surface runoff, mixing with chemicals and dust is possible during construction. Tottenham substation has a possibility of contaminated water running off into the Lee valley and its tributaries. Epping forest is not at risk. With the creation of a CEMP, this will be able to mitigate for the possibilities of water quality contamination and therefore screen out this constraint.	Screened out, subject to CEMP
Lee Valley SPA, Lee Valley RAMSAR and Epping Forest SAC	Recreational pressure	Tottenham substation will sustain the same population and number of workers, creating no difference in recreational pressures	Screened out
Lee Valley SPA and Lee Valley RAMSAR	Habitat management	No habitats off the Tottenham substation will be altered, therefore, no change in habitat management.	Screened Out

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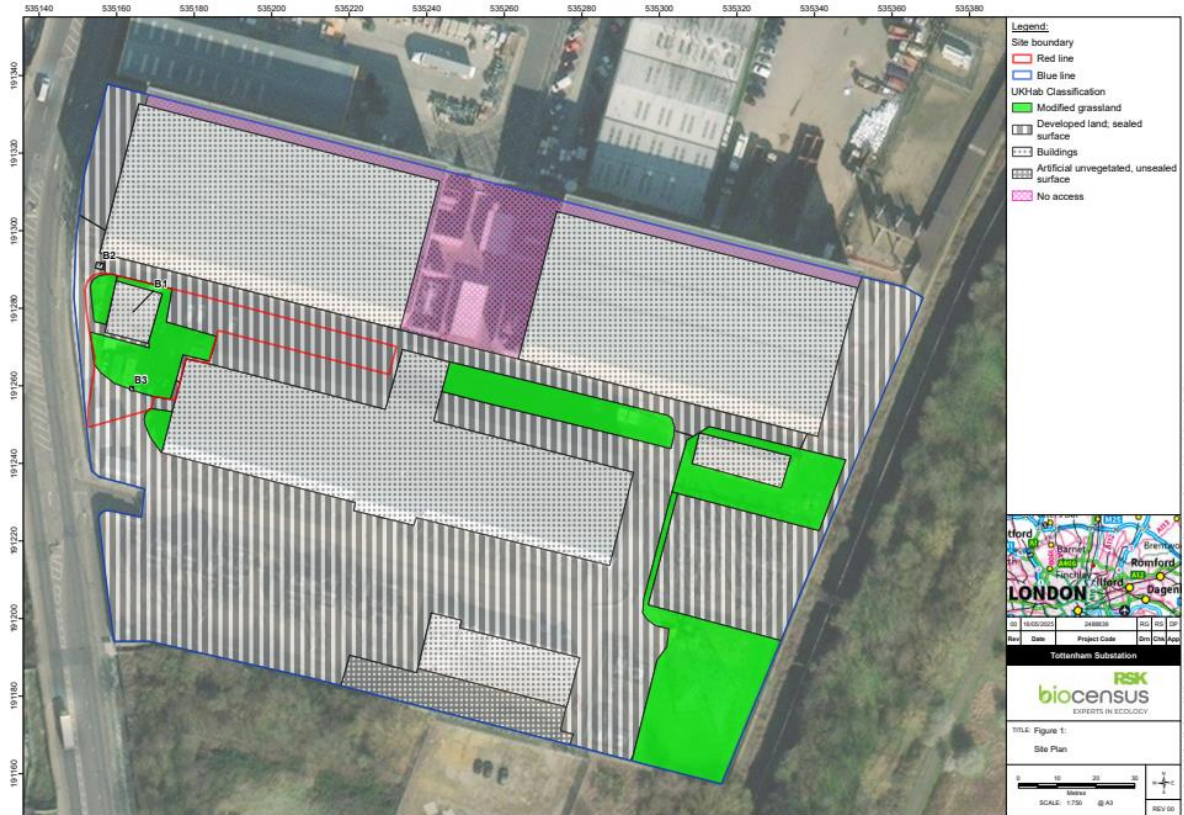
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FIGURES

Figure 1: Site Location Plan



Figure 2: UKHab Habitat Map





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