

Chapter 2: EIA Methodology

INTRODUCTION

- 2.1** This ES chapter sets out the overall approach to and methodology for undertaking the EIA. It details the process for identifying the environmental issues (or 'topics') to be included in the EIA and the method of assessing the likely significant effects that have the potential to arise as a result of the Proposed Development, both during the enabling and construction works and on completion of the Proposed Development.
- 2.2** As set out further in paragraphs 2.34 to 2.45 of this ES chapter, the scope of this ES has been thoroughly considered to ensure that the ES is proportionate and only focuses on those environmental topics which have the potential to result in likely significant effects. The planning application is supported by a suite of documents which includes standalone environmental assessments, for those topics where it was determined that significant effects on the environment were not likely to arise.
- 2.3** The methodology applied within this ES is in accordance with applicable legislation, guidance and case law, and has been tailored to each topic of the EIA using industry standard methods and criteria and professional opinion where appropriate. Further detail on how the assessment methodology is applied to each topic is presented within the respective technical chapters of **ES Volume 1** and **ES Volume 2**.
- 2.4** This ES chapter is accompanied by several appendices within **ES Volume 3**; these are referenced as relevant throughout this ES chapter.

EIA GUIDANCE AND PLANNING POLICY

EIA Guidance

- 2.5** The ES has been prepared in accordance with applicable legislation, guidance and case law for the preparation of such documents.
- 2.6** At the time of this planning application submission, Institute of Environmental Management and Assessment ('IEMA') has been rebranded under the new title of 'The Institute of Sustainability & Environmental Professionals' ('ISEP'). Guidance which was previously issued under the brand of IEMA remains referenced as such throughout this ES. Specifically, this ES has been undertaken in accordance with the IEMA Quality Mark indicator checklist and with due consideration to the following:
- In February 2020, the Withdrawal Agreement⁶ came into force that established the terms of the United Kingdom's orderly withdrawal from the European Union (EU). As the UK is no longer part of the EU, it is not required to adhere to EU laws (regulations, directives, decisions) or guidance. Nonetheless, reference has still been made to the European Commission's (EC's) various EIA guidance documents as these currently remain in line with the UK's EIA Regulations, and therefore provide helpful guidance¹;
 - At a domestic level, reference has been made to the Ministry of Housing for Communities and Local Government's (MHCLG) overarching Planning Practice Guidance²;
 - In addition, the Highways England 'Design Manual for Roads and Bridges Sustainability and Environment – LA104 Environmental Assessment and Monitoring'³ has been referred to as applicable;

¹ European Commission EIA Guidance Documents; <http://ec.europa.eu/environment/eia/eia-support.htm>

² <http://www.gov.uk/guidance/environmental-impact-assessment>

³ Highways England, 2020. Design Manual for Roads and Bridges 'Sustainability and Environment' – LA104 Environmental Assessment and Monitoring.

⁴ Institute of Environmental Management and Assessment, undated; EIA Quality Mark – ES Review Criteria COM 3-6.

⁵ Institute of Environmental Management and Assessment, 2004, Guidelines for Environmental Impact Assessment.

⁶ Institute of Environmental Management and Assessment, 2011. The State of Environmental Impact Assessment Practice in the UK.

⁷ Institute of Environmental Management and Assessment, 2017; Delivering Proportionate EIA.

⁸ Institute of Environmental Management and Assessment, 2020, Materials and Waste in EIA.

⁹ Institute of Environmental Management and Assessment, 2020, Climate Change, Resilience and Adaptation

¹⁰ Institute of Environmental Management and Assessment, 2020, Major Accidents and Disasters Guidelines

¹¹ Institute of Environmental Management and Assessment, 2021, 'Principles of Cultural Heritage Impact Assessment in the UK'.

- In relation to publications from professional bodies, reference has been made to IEMA publications as these include best practice/ suggested improvements to the EIA process. This includes:
 - IEMA ES Review Criteria (COM3-6)⁴;
 - IEMA 'Guidelines for Environmental Impact Assessment' (2004)⁵;
 - IEMA 'Special Report into the State Environmental Impact Assessment Practice in the UK' (2011)⁶;
 - IEMA 'Delivering Proportionate EIA' (2017)⁷;
 - IEMA 'Materials and Waste in EIA' (2020)⁸;
 - IEMA 'Climate Change Resilience and Adaption' (2020)⁹;
 - IEMA 'Major Accidents and Disasters in EIA: A Primer' (2020)¹⁰;
 - IEMA 'Principles of Cultural Heritage Impact Assessment in the UK' (2021);¹¹
 - IEMA 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (2022)¹²;
 - IEMA 'A New Perspective on Land and Soil in Environmental Impact Assessment' (2022)¹³;
 - IEMA 'Determining Significance for Human Health in Environmental Impact Assessment' (2022)¹⁴;
 - IEMA 'Effective Scoping of Human Health in Environmental Impact Assessment' (2022)¹⁵;
 - IEMA 'Effecting Non-Technical Summaries for Environmental Impact Assessment' (2023)¹⁶;
 - IEMA 'Environmental Assessment of Traffic and Movement' (2023)¹⁷; and
 - IEMA 'Implementing the Mitigation Hierarchy from Concept to Construction' (2024)¹⁸.
- Applicable EIA case law; and
- Topic specific guidance and assessment criteria, where appropriate.

- 2.7** Whilst primarily written for major infrastructure projects, reference is also made to guidance/ advice notes published by the Planning Inspectorate in relation to National Infrastructure Planning¹⁹ where appropriate, as these can include relevant/ helpful information.

Planning Policy

- 2.8** The EIA has considered relevant national, regional and local planning policy and guidance as summarised below.

National Planning Policy and Guidance

- 2.9** The EIA has been undertaken having regard to the National Planning Policy Framework²⁰ ('NPPF'). The NPPF sets out the Government's economic, environmental and social planning policies for England. The policies contained within the NPPF articulate the Government's vision of sustainable development, which are intended to be interpreted at a local level, to meet the requirements of local aspirations.
- 2.10** As relevant to the EIA, specifically to the scope, methodology and assessment of effects for the EIA technical topics, the NPPF has been considered throughout the EIA and preparation of the ES. The NPPF was last updated in August 2026.

¹² Institute of Environmental Management and Assessment, 2022. Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance, 2nd Edition

¹³ Institute of Environmental Management and Assessment, 2022. Guide to: A New Perspective on Land and Soil in Environmental Impact Assessment.

¹⁴ Institute of Environmental Management and Assessment, 2022; Determining Significance for Human Health in Environmental Impact Assessment.

¹⁵ Institute of Environmental Management and Assessment, 2022; Effective Scoping of Human Health in Environmental Impact Assessment.

¹⁶ Institute of Environmental Management and Assessment, 2023; Effective Non-Technical Summaries for Environmental Impact Assessment

¹⁷ Institute of Environmental Management and Assessment, 2023; Environmental Assessment of Traffic and Movement

¹⁸ Institute of Environmental Management and Assessment, 2024; Implementing the Mitigation Hierarchy from Concept to Construction

¹⁹ <https://infrastructure.planninginspectorate.gov.uk/>

²⁰ MHCLG, 2026; 'National Planning Policy Framework.'

- 2.11** The EIA has also been undertaken having regard to the Planning Practice Guidance ('PPG'), which is an online resource. The PPG aims to make planning guidance more accessible, and to ensure that the guidance is kept up to date.

Regional Planning Policy and Guidance

- 2.12** As relevant to the EIA technical topic scope, methodology or assessment of effects, the ES has had regard to the following key strategic planning documents. Any additional regional planning policy and guidance documents considered relevant to the technical chapters of this ES (**ES Volume 1, Chapters 6 to 9** and **ES Volume 2**) have also been considered:
- The London Plan – The Spatial Development Strategy for Greater London (March 2021) – hereafter referred to as 'the London Plan'²¹; and
 - Supplementary Planning Guidance (SPG) / London Planning Guidance (i.e. further guidance on policies in the London Plan).
- 2.13** The new draft London Plan²² was published in July 2026 for consultation and sets out the Mayor's strategy for spatial development from adoption to 2046/7. Consultation is open until October 2026 and adoption is not anticipated until 2028. As such, only limited weight can be placed upon the revised Plan and draft policies at this stage, with the existing adopted policies in the London Plan (2021) continuing to carry full weight in any planning application assessment.

Local Planning Policy and Guidance

- 2.14** As relevant to the EIA technical topic scope, methodology or assessment of effects, the ES has had regard to the following key local planning policy and guidance documents.

London Borough of Haringey Local Plan

- 2.15** The London Borough of Haringey ('LBH') Local Development Framework comprises of the LBH Local Plan (2013)²³ with subsequent alterations adopted in 2017. It was formally adopted in 2013 with the Development Management updated in July 2016.
- 2.16** The Local Plan is the principal document guiding development and growth within the LBH and covers the period up until 2026. It also consists of the Spatial Strategy and Strategic Policies.
- 2.17** The site falls within the Tottenham Hale Urban Centre Masterplan Supplementary Planning Document (SPD) which was adopted in 2006. This allocation looks to revitalise the Tottenham Hale area with LBH entering into an SPD with Argent Related to bring forward thousands of new homes and new commercial, retail, leisure and open spaces. town centre through additional retail, office, leisure, entertainment, cultural and housing.
- 2.18** The site also sits within the following designations:
- Lea Valley Opportunity Area²⁴;
 - Tottenham Hale District Centre²⁵;
 - Tottenham Hale Area Action Plan (AAP, 2017²⁶) area; and
 - Adopted Local Plan Site Allocations (2017) TH5 (Station Square North) and TH6 (Ashley Road South Employment Area)²⁷.

Draft Local Plan

- 2.19** The LBH is currently producing a new Local Plan to set out the LBH's vision for the development across the borough over the 15 year period up to 2040²⁸. It will provide a succinct and up-to-date framework for addressing the borough's economic, social and environmental priorities. It will also give local people a platform to shape their surroundings.
- 2.20** The preparation of the new Local Plan will include several stages of drafting and consultation. The initial stage sets out the themes of the Local Plan and consider issues and options for its development (Regulation 18). The consultation ran from 10 October 2025 until 19 December 2025. Under the draft local plan, the site does not form part of any emerging site allocations, however it forms part of the Opportunity Areas within the adopted London Plan. The site forms part of Policy SS1: Spatial Strategy – A Place Where We Can All Belong and Thrive within the draft Local Plan.

Other Guidance

- 2.21** Any additional planning policy and guidance documents considered relevant to the technical topics scope, methodology or assessment of effects which are covered by the EIA are also considered; these are identified in the relevant sections of this ES (**ES Volume 1, Chapters 6 to 9, ES Volume 2** and **ES Volume 3**)
- 2.22** In addition, where relevant to the assessment, the ES also presents a summary of any pertinent, recognised industry guidance documents.

PLANNING CONTEXT AND HISTORY

- 2.23** The site is subject to extant planning consents. The wider Ashley House and Cannon Factory site was granted outline planning permission (planning application ref. HGY/2016/4615, approved 02 May 2018) for:
- "Demolition of the existing buildings at Ashley House and Cannon Factory and erection of three buildings to provide up to 3,600sqm of commercial floorspace (GEA) (Class A1/A3/B1/D1), up to 265 residential units (Class C3), new public realm, landscaped amenity space, car and cycle parking and all associated works."*
- 2.24** This was subsequently amended by a Non-Material Amendment (NMA) (planning application ref. HGY/2018/2210 (approved 09 August 2018)) to update the parameter plans approved under the outline planning permission and Reserved Matters Application (RMA) (planning application ref. HGY/2018/2353) for appearance, landscaping, layout, scale and access details was approved on in November 2018. The RMA was subsequently amended via two NMAs to update the wording of conditions to allow for site demolition, clearance and drainage works to be carried out prior to submission of details (planning application refs. HGY/2022/4230 and HGY/2023/0890). This was implemented by way of demolition works and confirmed via a certificate of lawfulness (planning application ref. HGY/2023/1622) in August 2023. This permission remains extant.
- 2.25** Full planning permission was also secured for the Ashley Park site (planning application ref. HGY/2019/0108), which was initially refused by the LPA and then was approved at appeal on 16 April 2020 (planning application ref. APP/Y5420/W/19/3232707) for:
- "Demolition of existing buildings and erection of a part 6, part 8 storey building to provide 97 residential units (Class C3), 170 sqm of commercial floorspace (Class A1/A3/B1), new public realm, car and cycle parking and associated works."*

²¹ GLA, 2021; 'The London Plan: The Spatial Development Strategy for Greater London - March 2021.

²² GLA, 2026, 'Draft London Plan'. Available at: [1. Overview of the Plan and Good Growth objectives | London City Hall](#)

²³ London Borough of Haringey (2013). Haringey Local Plan: Strategic Policies. Available at: [Local Plan: Strategic Policies | Haringey Council](#)

²⁴ GLA, 2021; 'The London Plan'.

²⁵ London Borough of Haringey. 2013. 'Tottenham Hale District Centre Framework'. Available at: [Tottenham Hale district centre framework - part](#)

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²⁶ London Borough of Haringey. 2017. 'Tottenham Area Action Plan'. Available at: [Tottenham Area Action Plan \(2017\) document](#).

²⁷ London Borough of Haringey. 2017. 'Local Plan: Site Allocations Development Plan Document'. Available at: [Local Plan: Site Allocations DPD | Haringey Council](#).

²⁸ London Borough of Haringey (2025): Haringey Draft Local Plan. Available at: [Draft Local Plan | Haringey Council](#)

- 2.26** An NMA (planning application ref. HGY/2022/4229, approved 03 March 2023) then made changes to the wording of conditions to allow or site demolition, clearance and drainage works to be carried out prior to the submission of details.
- 2.27** The boundaries of these original consents are detailed within Figure 2.1 below.
- 2.28** The implementation of both planning permissions has been confirmed by the approval of Certificate of Lawfulness (existing use) applications as follows, and both sites therefore have an extant consent:
- Ref. HGY/2023/1622 approved 21/8/2023: “Certificate of lawfulness (existing use) for implementation of planning permission HGY/2016/4165, by way of demolition works involving the demolition of brickwork, demolition of corrugated walls, dismantling of roller shutters, and removal of windows.”
 - Ref. HGY/2023/1621 approved 21/08/2023: “Certificate of lawfulness (existing use) for implementation of planning permission HGY/2019/0108 allowed at appeal under APP/Y5420/W/19/3232707, by way of demolition works involving the demolition of brickwork, demolition of areas of the facade and removal of windows.”
- 2.29** Ref HGY/2023/1622 approved the lawful implementation of HGY/2016/4165 (and associated subsequent applications) via demolition of the east-west linear building across the existing site whilst HGY/2023/1621 approved lawful implementation of HGY/2019/0108 via the demolition of the north-south existing building. There has been no further activity at the site following site clearance and the delivery of the schemes has been stalled since 2023.
- 2.30** A summary of the planning history relating to the site is included in Table 2.1 below.
- 2.31** The site covers areas that formed part of the Ashley Road South Masterplan and Ashley Park applications.

Table 2.1 Site Planning History

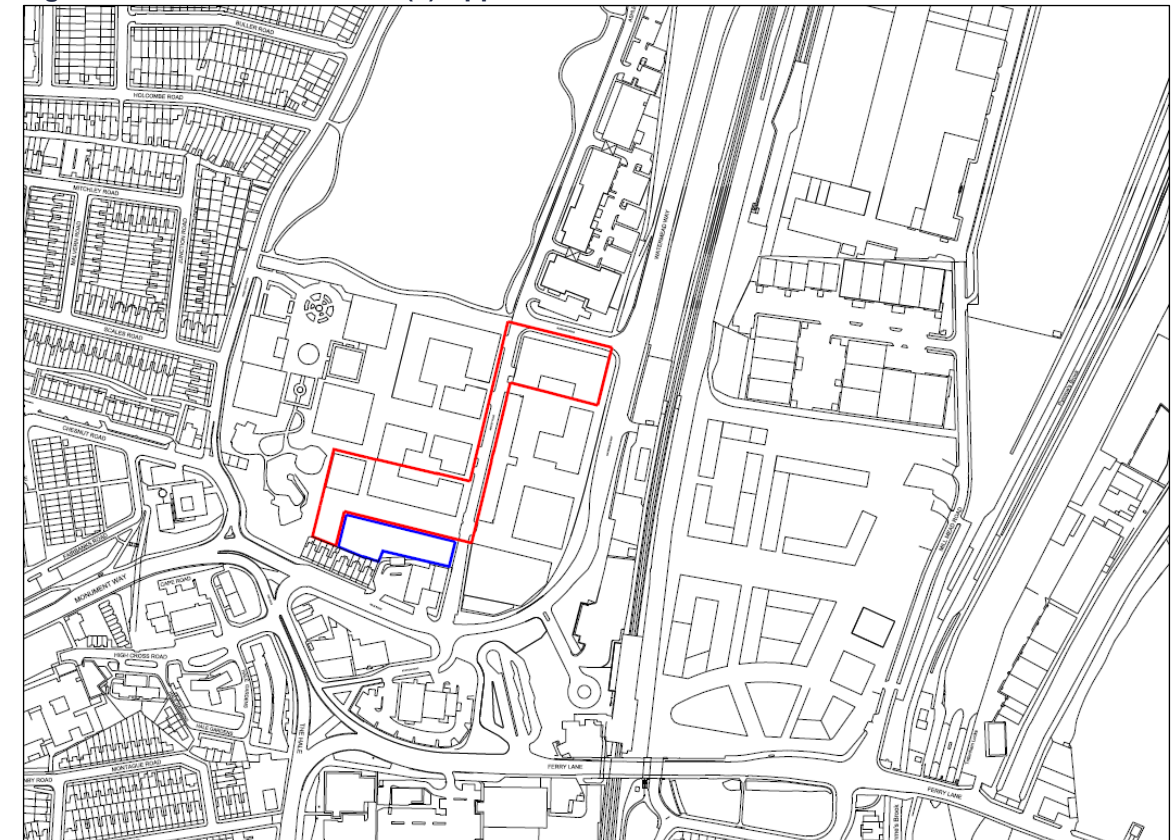
Planning Reference	Description of Development	Decision	Date of Decision
HGY/2016/4165	Outline planning application for the Demolition of the existing buildings at Ashley House and Cannon Factory and erection of three buildings to provide up to 3,600sqm of commercial floorspace (GEA) (Class A1/A3/B1/D1), up to 265 residential units (Class C3), new public realm, landscaped amenity space, car and cycle parking and all associated works.	Approved	02/5/2018
HGY/2018/2210	Non-material amendments to Condition 6 (Approved Drawings) following a grant of outline planning permission HGY/2016/4165	Approved	08/08/2018
HGY/2018/2353	Reserved Matters of appearance, landscaping, layout, scale and access and discharge of Condition 1 of outline planning application HGY/2016/4165 for the Demolition of the existing buildings at Cannon Factory and Ashley House and erection of three buildings to provide 3,171 sqm of commercial floorspace (GEA) (Class A1/A3/B1/D1), and 256 residential units (Class C3), new public realm, landscaped amenity space, car and cycle parking and all associated works. An Environmental Statement was submitted with the outline planning application.	Approved	14/11/2018
HGY/2022/4230	Non-Material Amendment (NMA) to planning permission HGY/2016/4165 to enable changes to be made to Conditions 18, 19, 20, and 23 to allow for site demolition, site clearance, and proposed drainage works to be carried out prior to submission of details; The removal of the restrictions under Conditions 21 and 29 as they are no longer necessary; and a correction to the title of Condition 30 to reflect the wording of the main body of the Condition text.	Approved	03/3/2023
HGY/2023/0890	Non-Material Amendment (NMA) to planning permission HGY/2016/4165 to enable changes to be made to the wording of Condition 25 to allow for site demolition works to be carried out prior to submission of details.	Approved	05/4/2023

Planning Reference	Description of Development	Decision	Date of Decision
HGY/2019/0108	Full planning application for the Demolition of existing buildings and erection of a part 6, part 8 storey building to provide 97 residential units (Class C3), 170 sqm of commercial floorspace (Class A1/A3/B1), new public realm, car and cycle parking and associated works	Refused	10/04/2019
APP/Y5420/W/19/3232707		Approved	16/04/2020
HGY/2022/4229	Non-Material Amendment (NMA) to planning permission HGY/2019/0108 (Allowed on Appeal APP/Y5420/W/19/3232707) to enable changes to be made to Conditions 12, 14, and 15 to allow for site demolition, site clearance, and proposed drainage works to be carried out prior to submission of details.	Approved	03/03/2023

Future Planning Context

- 2.32** As noted above, the site is part of the wider Tottenham Hale Urban Centre Masterplan SPD area. To date, development has come forward within the SPD area. In addition, sites identified for future development have been subject to planning applications and consents, and as relevant have been considered within this EIA as ‘cumulative schemes’ (as discussed in paragraphs 2.107 to 2.109 of this ES chapter).
- 2.33** Located to the north of the site, also located within the SPD area and owned by a separate Applicant, is a land parcel referred to as ‘Cannon Factory’. The proposals for this site are currently emerging, and likely to form a planning application in due course. These emerging proposals have been considered as appropriate within this ES, as described within the ‘Cumulative Effects and Effect Interactions’ section of this ES chapter.

Figure 2.1 Extant Consent(s) Application Boundaries²⁹



Planning application reference: HGY/2016/4165 (shown indicatively in red) and planning application reference: HGY/2019/0108 (indicatively shown in blue).

²⁹ Drawing Reference: 1824-JMP-02-XX-DR-A-0001 submitted under Planning Application Reference: HGY/2016/4165.

EIA SCOPING AND CONSULTATION

Consultation

- 2.34** Consultation is an ongoing process and the results have informed the design of the Proposed Development. **ES Volume 1, Chapter 3: Alternatives and Design Evolution** provides a review of the consultation undertaken in respect of the design evolution of the Proposed Development, specifically in relation to environmental considerations. A summary of the consultation undertaken with respect to the design of the Proposed Development is provided in **ES Volume 1, Chapter 3: Alternatives and Design Evolution**.
- 2.35** Consultation has fed into and influenced the EIA; both in regard to the scope and methodology of the EIA. Where members of the Project team involved in the preparation of the technical ES chapters have consulted with any consultee representatives (including statutory consultees) regarding their respective assessments, a summary is presented within the introduction table of the corresponding ES chapter (see 'Consultation').
- 2.36** A Planning Statement and Statement of Community Involvement have been submitted in support of the planning application, which together summarise the wider consultation that has been undertaken with various consultees throughout the pre-application process.

EIA Scoping

- 2.37** Scoping forms one of the first stages of the EIA process and it is through EIA scoping that the Local Planning Authority ('LPA') (in this case the LBH) and other key statutory and non-statutory consultees are consulted on those environmental topics that should be included in the scope of the EIA. It is however noted that, as set out within Paragraph 036 of the PPG, there is no legal requirement for the Applicant to seek a formal EIA Scoping Opinion³⁰
- 2.38** Where an EIA Scoping Opinion has been issued, Regulation 18(4) of the EIA Regulations requires the ES to be based on the most recent EIA Scoping Opinion. In this case, an EIA Scoping Opinion Request Report has been submitted, but no formal EIA Scoping Opinion has been received at the time of submission.
- 2.39** The process of EIA scoping and consultation is important to the development of a comprehensive and balanced ES. Views of consultees have helped to identify specific issues that require further investigation as part of the EIA process.
- 2.40** The main purpose of the EIA scoping process includes:
- Definition of the approach to the EIA;
 - Identification of the availability of existing baseline data and appropriate baseline surveys to be undertaken;
 - Identification of sensitive receptors;
 - Identification of potential environmental considerations and potential environmental effects;
 - Identification of the topics to be included within the scope of the EIA (i.e. scoped-in) and the methodology for assessment;
 - Identification of any topics that can be scoped-out of the EIA, with justification provided as to why likely significant residual environmental effects are not anticipated;
 - Definition of the methodology for the assessment of the likely significant environmental effects; and
 - Identification of other development schemes to be considered within a cumulative effects assessment.
- 2.41** An EIA Scoping Opinion Request Report was submitted to the LBH on 27 July 2026 (hereafter referred to as the 'EIA Scoping Report') to request an EIA Scoping Opinion from the LBH and statutory consultees regarding

the scope of the EIA. The EIA Scoping Report is provided in **ES Volume 3, Appendix: EIA Methodology – Annex 1**.

- 2.42** At the time of submission of the planning application, an EIA Scoping Opinion had not been received from the LBH.

'Scoped-In' Topics

- 2.43** The environmental disciplines that were identified during the EIA Scoping process that could **potentially** give rise to likely significant effects and that have therefore been addressed by the ES are listed below:
- Socio-Economics (Completed Development only) (**ES Volume 1, Chapter 6**);
 - Noise and Vibration (Enabling and Construction Works only) (**ES Volume 1, Chapter 7**);
 - Wind Microclimate (**ES Volume 1, Chapter 8**);
 - Daylight, Sunlight, Overshadowing and Solar Glare (**ES Volume 1, Chapter 9**); and
 - Townscape and Visual Impact Assessment (TVIA) (**ES Volume 2**).

'Scoped-Out' Topics

- 2.44** The EIA Scoping process identified several environmental topic areas which are not likely to give rise to significant environmental effects and therefore would not need to be assessed further as part of the EIA. Full details of the justification for scoping these topics out can be found within **ES Volume 3, Appendix: EIA Methodology – Annex 1**, and a summary of the justification for the scoping out the following topics is set out:
- Air Quality – this topic has been scoped out as it is considered that during the enabling and construction works, the implementation of appropriate best practice management and control practices would ensure construction dust and construction vehicle emissions would be minimised, and therefore any residual effects would be not significant. With regards to the completed development, given the baseline pollutant concentrations it is considered that the UK Air Quality Objectives are likely to be met for future users of the site, and therefore the effect of local air quality on future users of the Proposed Development would not be significant. Additionally, given the car-free nature of the Proposed Development (except for Blue Badge parking), and proposed Energy Strategy (submitted as a standalone report to support the planning application), and the low vehicle trip generation, significant air quality impacts are not expected on or off-site. An Air Quality Assessment has been submitted as a standalone report to support the planning application;
 - Archaeology - this topic has been scoped out as it is considered that the Proposed Development is unlikely to result in significant effects on archaeology due to the anticipated limited potential for the survival of archaeological assets across the site, and the likely negligible to low importance of any remains that may be present. A baseline Archaeological Desk-Based Assessment has also been produced as a standalone report to support the planning application;
 - Built Heritage - this topic has been scoped out as it is considered not likely to result in significant effects to built heritage receptors, owing to the distance of designated heritage assets from the site (the closest being approximately 340m away, and all others approximately 495m or further away) as well as non-designated heritage assets (with the nearest located along Ashley Road, and all others location at distances of approximately 410m or more), and the varied urban context and high-rise setting within which they reside. A stand-alone Heritage Impact Assessment has been produced and submitted in support of the planning application, which assesses the effects of the Proposed Development on built heritage receptors;
 - Climate Change and Greenhouse Gases – this topic has been scoped out as the scale of the Proposed Development, in the context of relevant greenhouse gas (GHG) emission benchmarks and budgets, means it is considered unlikely that the contribution of GHG emissions associated with the Proposed

³⁰ Ministry of Housing, Communities and Local Government, 2014. *Planning Practice Guidance – Environmental Impact Assessment* (last updated 2020). Available at: <https://www.gov.uk/guidance/environmental-impact-assessment>

Development (including embodied carbon within materials and operational carbon emissions) would lead to material changes in climate conditions over the life of the Proposed Development. Additionally, reports including the Whole Life Carbon, Energy Statement, Sustainability Strategy and Transport Assessment, which have been prepared as standalone documents to support the planning application, set out how the design of the Proposed Development minimises the impact on climate change as far as possible. Therefore, given the proposed incorporation of sustainable design standards and principles, the Proposed Development in isolation is not considered to have significant effects to climate change.

- Ecology and Biodiversity - this topic has been scoped out as the ecological features on-site are considered to have a low baseline value, and coupled with the adoption of proposed design and mitigation measures, the Proposed Development is not considered to have potential to generate likely significant adverse effects on ecology and biodiversity resources, and will not be significant in EIA terms. A standalone Ecological Appraisal, covering the findings of the baseline survey, ground level tree assessment and biodiversity net gain (BNG) assessment and Shadow Habitats Regulation Assessment, has been prepared as a standalone document to accompany the planning application;
- Ground Conditions and Land Contamination – this topic has been scoped out as considering the existing baseline conditions on the site and within the surrounding area, as well as the implementation of appropriate mitigation, management and monitoring measures (to be secured through appropriately worded pre-commencement planning conditions), significant environmental effects with regards to ground conditions and land contamination are considered unlikely. A Phase 1 Geotechnical and Geo-environmental Desk Study has been produced as a standalone document to accompany the planning application;
- Human Health – this topic has been scoped out as based on available baseline data and emerging scheme information, it is anticipated that the Proposed Development will have a Negligible to Beneficial, but ultimately not significant, impact on the determinants of health which influence wider population health and wellbeing. Human health is however considered within the Health Impact Assessment (HIA), which has been prepared as a standalone document to accompany the planning application;
- Light Pollution – this topic has been scoped out as the existing baseline conditions on-site and in the surrounding area, the nature of the Proposed Development (residential-led) and the implementation of include a lighting strategy that will comply with the ILP Guidelines as to not result in significant light spill effects to the neighbouring receptors and park, mean that significant effects in relation to light spillage are unlikely. The lighting strategy will be sought as a planning condition, with a draft lighting strategy provided within the Landscaping Strategy and submitted to support this planning application;
- Noise and Vibration (Completed Development) – the assessment of the operational traffic has been scoped out of the EIA as any changes in road traffic associated with the Proposed Development are minimal, and will not give rise to significant effects. Additionally, an assessment of building services plant noise and non-residential uses (Use Class E and F2) have also been scoped out, the former on the basis that any noise produced by building services plant must be controlled to achieve acceptable levels of environmental noise at the surrounding noise-sensitive receptors, and given the Proposed Development will be designed to achieve limiting rating noise levels in line with LBH requirements and the guidance set out within BS 4142 (which can be secured by condition). The latter has been scoped out on the basis that the usual measures (i.e. tenancy agreements) will inherently limit the noise generated within any tenancy, which in combination with the façade sound insulation will sufficiently restrict environmental noise emissions. The traffic flows, as well as proposed limits for rating noise level of new building services and the operation of proposed commercial or other non-residential uses, have all been considered as part of the standalone Noise and Vibration Impact Assessment, which has been submitted to accompany the planning application;
- Project Vulnerability - this topic has been scoped out as it is considered that the vulnerability of the Proposed Development to major accidents and natural disasters will be adequately managed throughout the lifetime of the project. As such, it is considered that the vulnerability of the Proposed Development to such events is in itself, unlikely to result in any significant effects on introduced site users and surrounding environmental and human receptors;
- Socio-Economics (Enabling and Construction Works) – an assessment of the socio-economic effects during the enabling works and construction has been scoped out of the EIA given the size and nature of

the local construction workforce, with any employment generated during the enabling and construction works being temporary in nature. Consequently, the impact of increased demand for construction workers is likely to be felt at the regional rather than the local level and, at this geographical scale, construction employment and associated spending effects are expected to have a beneficial but ultimately not significant impact. Further details on the assessment of non-residential floorspace and provision of community infrastructure is detailed in **ES Volume 1, Chapter 6: Socio-Economics** and reasonings for the deviation from EIA Scoping;

- Traffic and Movement – this topic has been scoped out as it is considered that during the enabling and construction works, the construction traffic will be temporary, regulated by the site construction hours, and will be of a level that can be managed uniformly across the day. The additional Heavy Goods Vehicle (HGV) movements in and out of the site during the construction works will not be significantly noticeable to any sensitive receptors owing to the nature of the local highways, and will be appropriately managed. Suitable mitigation measures will be secured would be designed and implemented through a Construction Logistics Plan (CLP) and/ or Construction Environmental Management Plan (CEMP). These documents would be secured and agreed with the LBH via suitably worded planning conditions, with outline CEMP and CLPs submitted to support this planning application, and therefore significant environmental effects with regards to traffic and movement during enabling and construction works are considered unlikely. With regards to operational traffic, based on the nature of the Proposed Development (car-free apart from Blue Badge parking), the level of accessibility, the traffic forecasts and the implementation of appropriate mitigation measures (detailed within the Transport Assessment prepared as a standalone document and submitted in support of this planning application), significant environmental effects with regards to traffic and movement are considered unlikely. A Transport Assessment/ Framework Travel Plan/ Delivery and Servicing Management Plan/ Outline Construction Logistics Plan has been prepared and submitted in support of the planning application, and a summary of the traffic management measures is available within **ES Volume 1, Chapter 4: The Proposed Development**;
- Waste and Materials – this topic has been scoped out as it is considered that significant effects in relation to waste and materials are unlikely given following the implementation of appropriate mitigation measures during enabling and construction works, as well as for the completed development. During enabling and construction works, these measures will largely be implemented through a CEMP and a Site Waste Management Plan (SWMP). Outline versions of these plans have been prepared and submitted to support the planning application. For the completed development, mitigation will be implemented in line with an Operational Waste Management Plan (OWMP), and a Circular Economy Statement (CES) has been prepared to demonstrate how the Proposed Development will incorporate circular economy measures into all aspects of the design and operation (including operational waste arisings). Both of these documents have been produced as standalone reports and submitted in support of the planning application. Details on construction materials and waste are also set out within **ES Volume 1, Chapter 5: Enabling and Construction Works**, and information on operational waste management is set out within **ES Volume 1, Chapter 4: The Proposed Development**; and
- Water Resources, Flood Risk and Drainage – this topic has been scoped out as it is considered that owing to the existing baseline conditions on-site (e.g. Flood Zone 2, largely a 'Very Low' risk of surface water flooding and no potential for groundwater flooding) and in the surrounding area, with the inclusion of appropriate mitigation measures during the enabling and construction works as well as once the Proposed Development is complete and operational, significant environmental effects with regards to water resources, flood risk and drainage are considered unlikely. A Flood Risk Assessment (FRA) and Drainage Strategy Report (DSR) have been prepared and submitted to support the planning application, with the FRA assessing the risk of flooding from fluvial, groundwater, surface water, sewer, tidal and other artificial sources, and the change in risk due to climate change.

2.45 Any necessary mitigation measures relating to the scoping out of these environmental topics are included in **ES Volume 1, Chapter 12: Environmental Management, Mitigation and Monitoring Schedule**.

ENVIRONMENTAL IMPACT ASSESSMENT METHODOLOGY

2.46 The method behind the EIA process generally considers the existing conditions of the area into which the development is being introduced (**the baseline**), providing a **future baseline** context for assessments where

relevant, and makes reasonable predictions of the likely change (**the impact – in terms of magnitude**) that may occur, during both its construction and when the development is completed and operating as proposed. The predicted impact is considered in terms of key environmental and social aspects (**receptors**) found within the surrounding area, and based on their sensitivity to change, the scale of the resulting change experienced by the receptor/ resource (**the effect**) is then determined along with a statement on whether the effect is significant or not.

- 2.47** Any mitigation measures required to reduce or eliminate adverse effects are then considered and assessed, with the resulting residual effect scale being determined as significant or not.
- 2.48** Effects resulting from a combination of the Proposed Development and other surrounding schemes (referred to as cumulative schemes) are also assessed. All the likely effects of the Proposed Development are reported within this ES (**ES Volume 1 and 2**) the likely significant effects are specifically highlighted.

Baseline Condition

- 2.49** The purpose of the EIA is to predict how environmental conditions may change as a result of the Proposed Development. The assessment of the nature and scale of a predicted change is undertaken against a reference condition, known as the baseline. In most cases, the existing baseline (i.e. the cleared, hoarded site) represents the environmental condition of the site and the surrounding area at the time of the assessment, as presented in **ES Volume 1, Chapter 3: Alternatives and Design Evolution**.
- 2.50** Baseline assessments utilise any existing and available information, as well as new information either collected through baseline surveys undertaken during the course of the EIA process or additional information provided as part of the EIA Scoping and the consultation process. This information has been used to present within the ES (within the individual technical chapters) an up to date description of the baseline conditions of the site and surrounding area.
- 2.51** The baseline has been taken as the existing conditions within the site and the surrounding area, at the time of assessment i.e. in the assessment year of 2026. Where information is not available for this year, appropriate data from an alternative year has been utilised, as well as new information either collected through baseline surveys undertaken during the course of the EIA process or additional information provided as part of EIA scoping and consultation process.

Future Baseline

- 2.52** The future baseline is a baseline condition at an indeterminate point in the future in the absence of the Proposed Development being implemented, for a scenario which considers potential changes because of the following (which is specific to each project, location and technical topic):
- Natural changes, patterns and trends (e.g. trees / scrub have grown larger, projected changes in birth rates, patterns in use of private vehicles/public transport, etc.); and
 - Changes that could occur in accordance with Plan and Policy (e.g. the LBH Local Plan).
- 2.53** This section of the assessment meets the requirements of the EIA Regulations, in terms of consideration as to how the existing baseline condition may evolve in the future in the absence of the Proposed Development. The EIA Regulations state (Schedule 4, paragraph (3)):
- “A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.”*
- 2.54** This requirement is addressed within **ES Volume 1, Chapters 6 to 9 and ES Volume 2** under the heading ‘Future Baseline’. In most cases, a qualitative approach is taken (professional opinion), but in some instances this may be quantitative.

- 2.55** Where relevant, assessments have considered cumulative schemes which have consent and under construction as completed and therefore, treated as within the existing baseline condition for assessments given there is certainty that these will be completed and operational by the time the Proposed Development commences.

Potentially Sensitive Receptors

- 2.56** When undertaking an EIA, it is important to identify key potential receptors from the surrounding baseline context which may be impacted by the Proposed Development and may need to be considered as part of the assessment. The EIA process has included the identification and assessment of impacts to and effects on potentially sensitive receptors, which include those within the baseline conditions, and any new potential receptors introduced as part of the Proposed Development.
- 2.57** Within each of the technical ES assessments (**ES Volume 1, Chapters 6 to 9 and ES Volume 2**), a list of sensitive receptors is presented, which are considered to have the potential to be affected by the Proposed Development.
- 2.58** The receptors addressed within the technical ES chapters have been identified from a review of the available information collected as part of the description of the surrounding environmental context for each technical assessment, from historic and currently available information relating to the site itself and through EIA Scoping consultation. Potentially sensitive receptors have also been identified based on the Proposed Development sought for approval (**ES Volume 1, Chapter 4: The Proposed Development**) and the potential impacts and resultant effects which may occur as a result of the Proposed Development, as well as the sensitivities of the newly introduced receptors.

Identification of Impacts, Effects and Effect Significance

Terminology and Definitions

Reference to ‘Impact’ and ‘Effect’

- 2.59** It is noted that the terms ‘impact’ and ‘effect’ are distinctly different. Having gained an understanding of the likely impact it is then important to know whether the change in environmental conditions results in a likely significant environmental effect.
- 2.60** The impacts of the Proposed Development may or may not result in significant effects on the environment, depending on the magnitude of the impact, the sensitivity of the relevant receptors and possible other factors (such as duration). The assessment of the likely significant effects of the development is a requirement identified by Schedule 4 of the EIA Regulations.

Receptor Sensitivity and Magnitude of Impact

- 2.61** To achieve a consistent approach across the different technical disciplines addressed within the ES, assessments have broadly defined the sensitivity of the receptors that could be affected by the Proposed Development and the magnitude of impact or change from the baseline conditions in order to derive the resultant effect. Technical specialists have used their own approach or amended the approach stated below based on what is appropriate for their assessments and, where there has been any departure, this is explained within the relevant ES chapter.
- 2.62** Terminology to describe the sensitivity of receptors and magnitude of impact or change from the baseline conditions is broadly as follows:
- High;
 - Medium;
 - Low; or

- Negligible.

2.63 Where there is no impact / change, no assessment will be required due to there being no potential for significant effects.

2.64 Each of the technical assessment chapters of the ES (**ES Volume 1, Chapters 6 to 9** and **ES Volume 2**) has provided further detail on the definition of each of the above terms specific to the topic in question and will also provide the criteria, including sources and justifications, for quantifying the different levels of receptor sensitivity and ‘impact magnitude’. Where possible, this has been based upon quantitative and accepted criteria (for example, national standards for air quality and noise), together with the use of value judgement and expert interpretation.

2.65 Alternatively, some technical ES chapters differ in the terminology adopted to describe the magnitude of impact or change from the baseline conditions. Where this occurs, the alternative terminology adopted has been clearly set out within the individual ES chapter.

Likely Significant Effects

Identification of a Resultant Effect

2.66 The basis for determining the resultant effect generally takes into account the sensitivity of the receptor and magnitude of impact or change from the baseline conditions. A generic matrix that combines the sensitivity of the receptor and the magnitude of impact to identify the resultant effect is provided within Table 2.2 (although where this differs for a technical topic, this has been clearly stated in the topic’s methodology).

Table 2.2 Resultant Effects

Receptor Sensitivity	Magnitude of Impact			
	High	Medium	Low	Negligible
High	Major	Major	Moderate	Minor
Medium	Major	Moderate	Minor	Negligible
Low	Moderate	Minor	Negligible	Negligible
Negligible	Minor	Negligible	Negligible	Negligible

Identification of Scale of Effect

2.67 Table 2.3 provides the broad definition of the ‘scale’ of the resultant effect i.e., definitions of Major, Moderate, Minor and Negligible effects. The definitions in Table 2.3 may be adjusted to suit the technical topic in question; where this is the case revised definitions of effect scale are presented in the technical assessment chapters (**ES Volume 1, Chapters 6 to 9** and **ES Volume 2**). Where there is no impact to a receptor and therefore no effect, this has been stated.

Table 2.3 Broad Definitions of the Scale of the Effect

Scale of Effect	Description
Major	These effects may represent key factors in the decision-making process. Major effects generally result from receptors of high sensitivity (such national importance or likely to be important considerations at a regional or district scale) and/or impacts of a high magnitude (such as the loss of large areas of land). Major effects can also result from receptors of medium sensitivity combined with an impact of a high magnitude, or receptors of high sensitivity combined with an impact of a medium magnitude.
Moderate	These effects, if adverse, are likely to be important at a local scale and on their own could have a material influence on decision-making. Moderate effects generally result from receptors of medium sensitivity combined with an impact of a medium magnitude.

³¹ As negligible effects are defined as being imperceptible, the nature of the effect is not relevant.

Scale of Effect	Description
	Moderate effects can also result from receptors of low sensitivity combined with an impact of a high magnitude, or receptors of high sensitivity combined with an impact of a low magnitude.
Minor	These effects may be raised as local issues and may be of relevance in the detailed design of the project but are unlikely to be critical in the decision-making process. Minor effects generally result from receptors of medium sensitivity combined with an impact of a low magnitude, or receptors of low sensitivity combined with an impact of a medium magnitude.
Negligible	Effects which are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error, these effects are unlikely to influence decision making, irrespective of other effects. Negligible effects generally result from receptors of low sensitivity, combined with an impact of a low magnitude.

Effect Nature

2.68 Table 2.4 provides definitions of the ‘nature’ of the resultant Minor, Moderate or Major effect³¹, these being Adverse and Beneficial.

Table 2.4 Definition of the Nature of the Resultant Effect

Type of Effect	Description
Adverse	Detrimental or negative effects to an environmental / socio-economic resource or receptor. The quality of the environment is diminished or harmed.
Beneficial	Advantageous or positive effect to an environmental / socio-economic resource or receptor. The quality of the environment is enhanced.

2.69 In addition to Table 2.4, the TVIA (**ES Volume 2**) effects are assessed as beneficial, adverse, or neutral. This is in line with guidance in the Guidelines for Landscape and Visual Impact Assessment 2020 (GLVIA) which states that a professional judgement should be made as to whether effects can be described as ‘...positive or negative (or in some cases neutral) ...’ (see GLVIA paragraph 5.37 in reference to landscape/ townscape, and paragraph 6.29 (from which the preceding quoted extract is taken) for visual effects). The assessment as beneficial or adverse is a ‘net equation’, since with regard to the receptor that is being assessed, there may be both positive and negative effects as a result of the development.

Geographic Extent of Effect

2.70 The ES identifies the geographic extent of the identified effects. At a spatial level, ‘site’ or ‘local’ effects are those affecting the site and neighbouring receptors, while effects upon receptors in the LBH beyond the vicinity of the site and its neighbours are considered to be at a ‘borough’ level. Effects affecting Greater London are considered to be at a ‘regional’ level, whilst those which affect different parts of the country, or England as a whole, are considered being at a ‘national’ level³².

Effect Duration

2.71 For the purposes of the ES, effects that are generated as a result of the enabling and construction works (i.e. those that last for this set period of time) are classed as ‘temporary’; these may be further classified as either ‘short term’ or ‘medium-term’ effects depending on the duration of the enabling and construction works that generate the effect in question. Effects that result from the completed and operational stage of the Proposed Development are classed as ‘permanent’ or ‘long-term’ effects.

Direct and Indirect Effects

2.72 The ES identifies whether the effect is ‘direct’ (i.e. resulting without any intervening factors) or ‘indirect’ or ‘secondary’ (i.e. not directly caused or resulting from something else).

³² As per Schedule 4, paragraph 5 of the EIA Regulations, noting the nature and scale of the Proposed Development, transboundary effects are not considered relevant for consideration within the EIA for this scheme.

Significance of Effect

- 2.73** Following identification of an effect and the implementation of mitigation measures, the residual effect's scale, nature, geographic extent and duration and whether the effects are direct or indirect, using the above summarised terminology, has been summarised in a clear statement within **ES Volume 1, Chapters 6 to 9** and **ES Volume 2** and used to ascertain as to whether the residual effect is significant or not significant. Each technical assessment determines at what scale an effect is deemed to be significant, as this varies depending on the topic.
- 2.74** As a general rule, the following applies (although where this differs for a technical topic, this has been clearly stated in the topic's methodology):
- 'Moderate' or 'Major' effects are deemed to be 'significant';
 - 'Minor' effects are considered to be 'not significant', although they may be a matter of local concern; and
 - 'Negligible' effects are considered to be 'not significant' and not a matter of local concern.
- 2.75** As discussed within **ES Volume 1, Chapter 8: Wind Microclimate**, changes to the wind microclimate compared to the existing baseline conditions where it exceeds the safety or target conditions for the specific area (irrespective of the scale of effect), are considered an adverse effect and classified as being 'significant'.
- 2.76** Where mitigation measures are identified to either eliminate or reduce likely adverse effects, these have been incorporated into the ES, for example either through the design, or will be translated into enabling and construction commitments; or operational or managerial standards / procedures. It should be noted that mitigation is not required for effects that are deemed to be negligible as the effect will be imperceptible. Those measures not inherent in the design of the Proposed Development (i.e. submitted for approval as part of the planning application), will need to be secured through an appropriate means by LBH e.g. by imposition of a suitably worded planning condition or obligation with a s106 agreement.
- 2.77** The ES then highlights the 'residual' effects (those effects which remain following the implementation of suitable mitigation measures) and classifies these in accordance with the terminology defined above.
- 2.78** In all cases, the overall approach and specific methods of predicting the likely magnitude of impact and resultant scale, nature, geographic extent, duration and significance of an effect is set out in each of the technical assessments. Where used, recognised specific predictive methods are referenced. Any assumptions or limitations relevant to the assessments are stated.

Impact Assessment – General Methodology

- 2.79** Detailed methodologies for the assessment of each of the environmental topic areas scoped into the EIA are provided within each technical chapter of **ES Volume 1** and in **ES Volume 2**, however, in general terms, the assessments have been based upon:
- Understanding the baseline condition, either through:
 - Desk-top studies; and/or
 - Site surveys;
 - Understanding the policy context and the implications for assessment, including:
 - Consideration of relevant legislation; and
 - Consideration of relevant planning policies (national, regional and local).
 - Identification of potentially sensitive receptors that could be impacted by the Proposed Development;
 - Identification of potential environmental impacts, with an evaluation of their likely magnitude, and resultant effects in terms of their nature, scale, geographic extent, duration and whether they are direct or indirect, involving either:
 - The use of technical guidance and best practice; and/or

- Expert opinion;
- Consideration of the requirement for any specific mitigation; and
- Consultation with any interested and affected parties.

- 2.80** How the Proposed Development might affect the environment, relies on predictions about what impact a certain action will have. Some predictions can be made using mathematical or simulation models. Other impacts are less easy to predict in quantitative terms. In such cases, the EIA attempts to quantify the anticipated scale of impact using professional judgement.
- 2.81** Within each technical chapter of this ES, the assessment of the potential effects that are likely to arise because of a potential impact / change to receptors from the Proposed Development is initially presented. If any mitigation measures are required, further to that already integrated into the Proposed Development throughout its evolution, these are incorporated, and the Proposed Development is reassessed to ascertain the likely residual effects and any which are significant. This is reported on within each technical chapter of this ES (**ES Volume 1** and **ES Volume 2**).
- 2.82** Mitigation is the term used to refer to the process of avoiding where possible and, if not, minimising, controlling and / or off-setting potentially significant adverse effects of a development. Mitigation measures can relate to the design stage; the enabling and construction works stage; or the activities associated with the operation of the completed Proposed Development.

Assessment Scenarios

- 2.83** Each of the technical topic areas that have the potential for significant effects, and so are 'scoped in' to this ES, consider the following scenarios within their assessments:
- **Baseline Conditions (2026 or relevant alternative year)** – reflecting the existing baseline conditions on the site and within the surrounding area;
 - **Enabling and Construction** – an assessment of the potential enabling and construction effects associated with the Proposed Development against baseline conditions;
 - **Completed Development** – an assessment of the potential effects when the Proposed Development is complete and operational against baseline or future baseline conditions; and
 - **Cumulative** – An assessment of the potential cumulative effects of the Proposed Development with other surrounding consented, proposed or likely future (e.g. allocated sites) schemes both during construction and once the Proposed Development is complete and operational. Further detail is provided in the '*Cumulative Effects and Effect Interactions*' section of this ES chapter. Refer to **ES Volume 3, Appendix: EIA Methodology – Annex 3** for a full list of cumulative schemes.
- 2.84** These assessment scenarios are discussed further below.
- 2.85** Consideration of the decommissioning of the Proposed Development is not a requirement of the EIA Regulations relevant to this project, and therefore has not been assessed in the EIA or discussed any further in this ES.

Enabling and Construction Works of the Proposed Development

- 2.86** **ES Volume 1, Chapter 5: Enabling and Construction Works** provides an outline of the anticipated enabling and construction works programme and related activities and aspects (i.e. enabling works, substructure works, superstructure works etc., site clearance and excavation waste volumes and construction material quantities, heavy goods vehicle ('HGV') movements and HGV routing). The approximate peak period of monthly HGV movements associated with the enabling and construction works has been calculated.
- 2.87** The programme represented is based on reasonable assumptions in terms of the sequencing of the works and site logistics that will be implemented. The programme is considered achievable based on the current level of enabling and construction planning and anticipates the period of construction works are continuous.

- 2.88** The programme presents an overlap of construction activities with other stages of work and therefore assumes multiple construction activities occurring across the site. It is also assumed that impacts of a higher magnitude over a shorter duration are considered to be potentially greater in terms of the likely effect on a receptor, than an impact of lower magnitude spread over a longer duration. The EIA, therefore, assesses the reasonable worst-case effects (in terms of magnitude of impact) as a result of multiple construction activities occurring on-site at any particular time.
- 2.89** The information presented within **ES Volume 1, Chapter 5: Enabling and Construction Works** informs the enabling and construction impact assessments of each relevant technical chapter of the ES. Throughout the enabling and construction impact assessments, the assumption has been made that the standard environmental controls required under legislation and best practice guidance are met as a matter of course – refer to **ES Volume 1, Chapter 12: Environmental Management, Mitigation and Monitoring Schedule**.
- 2.90** The assessment of the potential likely significant effects arising during the enabling and construction works is addressed within each of the individual technical assessment chapters of the ES, as relevant (**ES Volume 1, Chapters 6 to 9** and **ES Volume 2**). The enabling and construction assessments identify the need for any additional or bespoke environmental management or mitigation measures in order to avoid, prevent, reduce or off-set any significant adverse effects identified.
- 2.91** Where relevant and required, a description of any proposed monitoring arrangements has also been presented and defines (where appropriate) the procedures regarding the monitoring of the relevant significant adverse effects, the types of parameters to be monitored and the monitoring duration.
- 2.92** All the measures proposed within the technical chapters have been compiled and presented in a mitigation and monitoring schedule for ease of reference (presented in **ES Volume 1, Chapter 12: Environmental Management, Mitigation and Monitoring Schedule**).

Completed and Operational Proposed Development

- 2.93** The ES presents a description of the Proposed Development in order to provide suitable context to enable the assessment of potential and likely significant environmental effects. Information regarding the key aspects of the Proposed Development (as listed below) is presented in **ES Volume 1, Chapter 4: The Proposed Development** to allow an understanding of the Proposed Development, in order to enable the assessment of potential and likely significant environmental effects of the completed and operational development.
- 2.94** Information on the details of the Proposed Development sought for approval include (but are not limited to):
- Layout – building footprints;
 - Scale – the massing, (including heights of the buildings);
 - Quantum – floors areas and Use Classes;
 - Appearance – architectural detail and materiality;
 - Access and egress– vehicular, pedestrian and cyclist accessibility into, out of and around the site;
 - Parking provision – including vehicles and cycles;
 - Landscaping – including planting strategy, species and habitats, amenity space provision and drainage;
 - Amenity space – amount of on-site provision;
 - Energy strategy; and
 - Deliveries and servicing strategy – including overview of estimates of the types and quantities of waste anticipated, and strategy for waste storage, handling and collection.

Flexible Use Class E / F2

- 2.95** The Proposed Development will provide a total of 355.72m² Gross Internal Area (GIA) of new employment generating floorspace across the site (including flexible Use Class E and Use Class F2). For the purposes of

the Proposed Development, the following sub-uses under Class E may be applied. These comprise the following:

- Use Class E(a) for the display or retail sale of goods, other than hot food, principally to visiting members of the public; and/ or
- Use Class E(b) for the sale of food and drink principally to visiting members of the public where consumption of that food and drink is mostly undertaken on the premises; and/ or
- Use Class E(c) for the provision of:
 - (i) financial services, or
 - (ii) professional services other than health or medical services, or
 - (iii) any other services which it is appropriate to provide in commercial, business or service locality; and/ or
- Use Class E(d) for indoor sport, recreation or fitness, not involving motorised vehicles or firearms principally to visiting members of the public; and/ or
- Use Class E(e) for the provision of medical or health services, principally to visiting members of the public, except the use of premises attached to the residence of the consultant or practitioner; and/ or
- Use Class E(f) for a creche, day nursery or day centre not including a residential use, principally to visiting members of the public; and/ or
- Use Class E(g) for
 - (i) an office to carry out operational or administrative functions.
 - (ii) the research and development of products or processes; and/or
 - (iii) industrial processes.

- 2.96** Detail on the reasonable worst-case scenarios assessed in relation to these uses is set out in the ‘*Impact Assessment Methodology*’ sections of the respective technical chapters of **ES Volume 1, Chapters 6 to 9** and **ES Volume 2**, where relevant.

Cumulative Effects and Effect Interactions

- 2.97** The EIA Regulations require that, in assessing the effects of a particular development proposal, consideration should also be given to the likely significant effects arising from the “*cumulation with other existing and/or approved projects*” (Schedule 4, 5(e)).
- 2.98** Cumulative effects can occur as interactions between the effects associated with a number of projects in an area which may, on an individual basis be insignificant, but together (i.e. cumulatively), result in a significant effect. Cumulative effects arising from the Proposed Development in combination with other development schemes (cumulative schemes) has been considered throughout the ES, as relevant. The potential for cumulative effects arising during the construction works and once the Proposed Development is complete and operational is considered.
- 2.99** Each individual technical chapter of the ES presents an assessment of the cumulative effects of the Proposed Development coming forward in isolation alongside other surrounding cumulative schemes, as relevant.
- 2.100** The EIA identifies the potential for the following, which is described below:
- Cumulative Effects with Other Developments; and
 - Effect Interactions.

Cumulative Effects with Other Developments

- 2.101** Cumulative effects arising from the Proposed Development in combination with ‘other existing and / or approved projects’ (‘cumulative schemes’) during enabling and construction and also once the Proposed Development

is completed are considered throughout the ES. Each individual technical chapter of the ES presents an assessment of the cumulative effects of the Proposed Development coming forward alongside the cumulative schemes, as relevant.

2.102 The criteria listed below have been set to allow all the schemes coming forward within the LBH, and adjacent boroughs, to be subject to an initial screening exercise to determine the schemes that, based on the scale of development (amount and mix of uses), could potentially have a cumulative effect with the Proposed Development and should be considered further within the Cumulative Effects Assessment of the technical ES chapters (**ES Volume 1, Chapters 6 to 9**). These criteria are as follows:

- Development located within a 1km radius from the site, that is subject to a planning application (and is either yet to be determined, has planning consent or a resolution to grant) comprising either;
 - An uplift of more than 10,000m² (Gross External Area (GEA) of mixed-use floorspace), or over 150 dwellings; or
 - Office to residential conversions (granted under the General Permitted Development Order) giving rise to more than 150 residential units; or
 - Any development / change of use adjacent to the site.

2.103 By applying these criteria to relevant schemes coming forward, the Cumulative Effects Assessment of the EIA becomes more focused on the schemes which, based on the scale of redevelopment (amount and mix of uses) and location relevant to the site, have more potential to interact in a cumulative manner.

2.104 In some instances, schemes that are under construction, where the construction works are significantly progressed or where early phases are occupied, will be factored into the baseline conditions (as a future baseline). As relevant, this is clearly set out within each individual topic's Cumulative Effects Assessment methodology text.

2.105 Given the lack of information available, their confidential nature, and that there is no certainty over whether they will be submitted or become an approved project, development schemes that are at the pre-application stage are not considered. There is no requirement to consider these schemes as these developments are not considered existing or approved.

2.106 However, a Screening Opinion Request has been submitted for the development of the Cannon Factory site, and therefore it can be inferred that a planning application for these proposals will be submitted in due course. Whilst the EIA Regulations do not require a cumulative assessment of the Cannon Factory proposals to be undertaken in this ES, when considering the proximity of the Cannon Factory site to the site of the Proposed Development (as shown in Figure 2.2), the emerging proposals for the Cannon Factory application have been included as a secondary assessment within this ES' cumulative assessment. The information used within the assessment is based upon the information made publicly available in the EIA Screening Opinion Request Report.

Cumulative Schemes

2.107 The following cumulative schemes (which are also detailed in **ES Volume 3, Appendix: EIA Methodology – Annex 3** and illustrated in Figure 2.2) have been identified for consideration within the EIA:

- Berol Quarter;
- Strategic Development Partnership (SDP) Sites, Welbourne, North Island, Ferry Island, Ashley Road East and Ashley Road West³³; and
- 29-33 The Hale.

³³ Note: Plots A, C D and E have been treated within the baseline condition as these have been either completed or due for completion prior to the time of the planning application being validated or determined.

2.108 Further to the above schemes, Tottenham Hale Retail Park has been identified within the LBH Draft Local Plan as a potential allocated site for redevelopment (TH SA01). Although a planning application has not yet been submitted for this site, it has been considered, as relevant, within each ES chapter.

2.109 In addition, the emerging Cannon Factory proposals have been considered as secondary assessment, where relevant.

2.110 Each technical chapter of the ES is clear on the cumulative schemes that have been considered within the Cumulative Effects Assessment of the topic in question, including a reasoning behind their inclusion. Where cumulative schemes are excluded / 'screened out' of the Cumulative Effects Assessment, the reasoning for doing so has been presented.

Effect Interactions

2.111 Effect interactions from the Proposed Development itself on surrounding sensitive receptors during the enabling and construction works and also once the Proposed Development is completed and operational are considered within this ES (**ES Volume 1, Chapter 10: Effect Interactions**). Effect interactions occur as interactions between effects associated with just one project, i.e., the combination of individual effects arising as a result of the Proposed Development, for example effects in relation to noise and airborne dust on a single receptor.

2.112 Effect interactions from the Proposed Development itself on particular receptors at the site and surrounds are considered during the enabling and construction works, and also once the Proposed Development is completed and operational. Dependent on the relevant sensitive receptors, the assessment focuses either on key individual receptors or on groups considered to be most sensitive to potential effect interactions. Based on the definitions of what Negligible effects comprise for each of the technical assessments; these do not warrant further consideration in relation to cumulative effects and therefore have not been pulled through into the assessment of effect interactions. Only residual effects described as Minor and above in scale have therefore been considered in the assessment of effect interactions.

2.113 There is no established methodology for assessing the impact of cumulative effects on a particular receptor. Therefore, the interaction of a combination of individual effects are determined to be either 'not significant' or 'significant', and a scale of the combined effects (Minor, Moderate or Major) is not applied. However, the European Commission³⁴ has produced guidelines to assist EIA practitioners in developing an approach which is appropriate to a project. These guidelines have been used to develop an approach which uses the defined residual effects of the Proposed Development (as presented within the technical chapters of the ES) to determine the potential for effect interactions. If one of the individual effects is significant the combination of effects would be regarded as 'significant' (with the exception of any Negligible effects). If none of the individual effects are significant, consideration will be given as to whether or not the combination of many not significant effects could result in a combined significant effect, based on professional opinion.

STRUCTURE OF TECHNICAL ASSESSMENTS

2.114 This ES reports on the potential (before mitigation) and residual (after mitigation) environmental effects of the Proposed Development during the construction works and on subsequent completion and operation. The ES also concludes with a summary of the likely significant beneficial, neutral and adverse environmental effects of the Proposed Development (**ES Volume 1, Chapter 11: Likely Significant Effects**).

2.115 Each of the environmental topics considered in the EIA has been assigned a separate chapter in **ES Volume 1**. Within each of the **ES Volume 1** technical chapters the assessment is presented and reported in the following format:

- An Introductory Table – setting out the author of the technical topic assessment, identification of relevant appendices, key topic related considerations and consultation as part of the EIA Scoping process and further consultation with relevant statutory consultees (if relevant);

³⁴ Guidelines for the Assessment of Indirect and Cumulative Impacts, Impact Interactions (1999), and Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report (2017)

- Assessment Methodology – an explanation of the approach to defining the baseline conditions and assessment scenarios and evolved baseline conditions, the approach to undertaking the impact assessment (construction and operation, and any key assumptions made) and the definitions of the nature and scale of effect and what effects are deemed to be significant;
- Baseline Conditions – a description of the baseline conditions of the site and surrounding area (as relevant to the technical topic in question) in addition to consideration of future baseline conditions (where relevant);
- Receptors and Receptor Sensitivity – identification of the existing and introduced (new) receptors on the site and in the surrounding area that may be affected by the Proposed Development and identification of their sensitivity;
- Potential Effects – an assessment of the likely significant effects of the Proposed Development during enabling and construction works and on completion, setting out the impacts and effects associated with each aspect of the assessment and an evaluation of their significance against defined criteria without the implementation of mitigation;
- Mitigation Measures, Monitoring and Residual Effects – a description of the mitigation measures that are being committed to and a summary of the residual effects of the Proposed Development;
- Assessment of Future Environment – an assessment of the likely significant effects of the Proposed Development in relation to both an evolution of the baseline conditions and any in combination effects with the identified cumulative schemes; and
- Likely Significant Effects – a short statement confirming which residual effects are considered to be significant for both the Proposed Development as well as residual cumulative effects with surrounding cumulative schemes.

2.116 ES Volume 2, Townscape and Visual Impact Assessment follows its own bespoke format.

KEY ASSUMPTIONS AND LIMITATIONS

2.117 The principal assumptions that have been made, and any limitations that have been identified, in undertaking the EIA are set out below. Assumptions specifically relevant to each technical topic have been set out in each technical chapter of the ES.

- Baseline conditions have been established from a variety of sources, including historical data and are accurate at the time of writing; individual sources are set out within the individual technical chapters of this ES (**ES Volume 1, Chapters 6 to 9** and **ES Volume 2**);
- It is understood that there some properties along Hale Road are either privately owned, owned by the LBH and rented out, or vacant and subject to future redevelopment plans. For a few technical assessments within this ES, the properties which are occupied are assessed as being highly sensitive receptors. Given the existing baseline condition of the vacant nature of the remaining properties, and the understanding that these properties are unlikely to become occupied due to future redevelopment plans, an assessment of these properties will be undertaken on a precautionary basis however, this will form a separate assessment located within the appendix to the relevant ES chapter. Whilst these properties will be treated with the same sensitivity, it is not considered appropriate to consider the increased levels of noise and vibration or daylight, sunlight and overshadowing reductions to the vacant dwellings in the main body of the assessment and ES chapters as it is not likely that this would become occupied in the future in the current built form. It is, however, noted necessary and appropriate to acknowledge and still assess these properties given it is not a certainty that they would remain unoccupied. They have therefore been considered within a separate appendix to the ES;
- It is assumed that information received from third parties is accurate, complete and up to date;
- The assessment of residual effects contained within each of the technical ES chapters of the ES (**ES Volume 1, Chapters 6 to 9** and **Volume 2**) are based on the assumption that the identified embedded mitigation measures are implemented – be it as set out in application drawings, through regulatory regimes or via the mitigation and management controls, described within **ES Volume 1, Chapter 4: Proposed**

Development and **ES Volume 1, Chapter 5: Enabling and Construction Works**, and **ES Volume 1, Chapter 12: Environmental Management, Mitigation and Monitoring Schedule**;

- Enabling and construction works across the site would take place substantially in accordance with the programme of works described in **ES Volume 1, Chapter 5: Enabling and Construction Works** and measures agreed through the CEMP;
- The aim of the EIA is not to assess the Proposed Development's compliance/ performance against planning policy, as this is considered within the Planning Statement that accompanies the planning application. Instead, reference is made to relevant national, regional and local policy and guidance to inform the scope of the assessment, the assessment methodologies applied, and the existence of any sensitive receptors to be considered;
- Where quantitative impact assessment is not possible, the limitations and justification are identified within the relevant technical ES chapter and as appropriate, qualitative assessment is presented;
- Where detailed information has not been available, reasonable assumptions have been made, and have been clearly set out, based on the professional experience of the author of the ES chapter and this may be based on other developments of similar type or scale for example, to enable assessment of likely significant effects;
- Consented or reasonably foreseeable cumulative schemes will be implemented substantially in accordance with information that is publicly available and subject to the same regulatory regimes and good practice management controls as this Proposed Development; and
- The secondary cumulative assessment of the Canon Street proposals are based upon publicly available information and certain assumptions have been applied.

Figure 2.2 Cumulative Schemes Map

