



- 16 The most significant emissions resulting from the Proposed Development will likely be as a result of carbon sequestration, and operational energy use and transport.
- 17 The following reports will be submitted in support of the planning application to ensure GHG emissions and the impact on climate change would be minimised as far as possible through the design of the Proposed Development:
- Healthy Streets Transport Assessment, accompanied by a Travel Plan, and an Operational and Construction Waste and Servicing Strategy;
 - Energy Statement;
 - Sustainability Strategy;
 - BREEAM pre-assessment;
 - Whole Life Carbon Assessment;
 - Landscaping Strategy; and
 - Biodiversity Net Gain Assessment.
- 18 Details from the abovementioned reports will be provided within the ES to summarise how the impacts of the Proposed Development on climate change will be reduced. This is expected to include the proposed low carbon and renewable technologies, as well as development design measures, which aim to minimise the impact of the Proposed Development's GHG emissions on climate change.
- 19 Therefore, based on the above and 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, and so the potential impact of GHG emissions on climate change is proposed to be scoped out of the EIA.

Cumulative Effects

- 20 No cumulative effects are anticipated as potential effects of climate change are specific to the Proposed Development and will not result in impacts to cumulative schemes. Cumulative effects will therefore not be considered within the climate change resilience assessment.

Mitigation Measures

Embedded Mitigation (Design)

- 21 The Proposed Development has been designed to be car-free, except for Blue Badge parking. Provision would also be made for vehicle, cycle and pedestrian access arrangements, together with cycle storage in accordance with current policy requirements.
- 22 The Energy Strategy is likely to be electricity-led and comprise ASHPs with MVHR provided for each unit.

Enabling Works and Construction Mitigation

- 23 The CEMP will provide measures to reduce GHG emissions from construction. Examples of measures that could be included within the CEMP Measures include:
- Implement anti-idling policies for vehicles and equipment;
 - Regular maintenance of machinery to improve fuel efficiency;
 - Use renewable electricity sources on-site when available; and
 - Optimise delivery schedules to reduce vehicle trips.

Completed Development Mitigation

- 24 An all-electric strategy with heating and cooling provided by air source heat pumps would ensure no on-site GHG emissions from energy consumption.
- 25 A Travel Plan and Transport Assessment would encourage sustainable travel and mitigate the impact of GHG emissions from operational vehicle use.
- 26 The Proposed Development will minimise the consumption of potable water through the use of efficient fixtures and fittings such as dual flush WCs, low flow showers and taps and appropriately sized baths.



Conclusion

- 27 It is considered that with mitigation, the impact of the Proposed Development on greenhouse gas emissions will not be significant. Based on the above, it is proposed to scope out an assessment of the effect of the Proposed Development on greenhouse gas emissions.



TOPIC SHEET

Ecology and Biodiversity

Introduction

- 1 It is considered that significant effects relating to ecology and biodiversity are unlikely and as a result this topic is '**Scoped Out**' of the EIA. The need for ecology and biodiversity to be scoped into the EIA has been considered by Trium Environmental Consulting LLP (Trium), and the following provides a summary of baseline conditions and clarifies why no likely significant effects are expected.
- 2 A Preliminary Ecological Appraisal (PEA) has been undertaken by Trium, comprising an extended UK Habitat Classification Survey undertaken on 09 July 2026 (in accordance with the methodology outlined in the UK Habitat Classification User Manual¹) and a review of desk study data, comprising publicly available resources and local records obtained from Greenspace Information for Greater London (GiGL). The assessment has been produced with reference to the Chartered Institute of Ecology and Environmental Management's (CIEEM's) Guidelines for Preliminary Ecological Appraisal², British Standard 42020 on Biodiversity – Code of Practice for Planning and Development³ and CIEEM's Guidelines for Ecological Impact Assessment (EclA)⁴.
- 3 The PEA will be expanded for the planning application and submitted as an Ecological Appraisal, detailing the baseline conditions and an update to the impacts and mitigation required as further detail of the proposals becomes available. It will also detail the findings of further surveys and include a Biodiversity Net Gain (BNG) assessment, considering the landscape strategy for the scheme, to comply with planning policy and, where not exempt, statutory requirements. Whilst noting the Proposed Development's design is currently evolving, the design is sufficiently progressed in order to understand at this point the likely effects relating to ecology and biodiversity, in terms of the potential for likely significant effects.

Baseline Conditions

Zone of Influence

- 4 The Zone of Influence (Zoi) for the ecology and biodiversity assessment has been defined by the potential for direct and indirect impacts arising from the Proposed Development. The Zoi considers the 'Source-Pathway-Receptor' model, accounting for the physical footprint of the works and the spatial extent of potential secondary effects. Specifically, noise, vibration, atmospheric dust deposition, and light spill during both the construction and operational phases.
- 5 Considering the urban context of the site, a Zoi encompassing the site and an area up to 2km from the site boundary has been used for the identification of important ecological features, although this is extended to 5km for the identification of nationally designated sites and 10km for European designated sites to reflect the greater sensitivity of these designations.

¹ UK Hab Ltd (2023) UK Habitat Classification Version 2.0 (at <https://www.ukhab.org>).

² CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

³ British Standards Institute (2013) British Standard 42020: Biodiversity – Code of Practice for Planning and Development. BSI, London.

⁴ CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.2. Chartered Institute of Ecology and Environmental Management, Winchester.

Threshold for Inclusion

- 6 The starting point for any impact assessment, and one of the key challenges in Ecological Impact Assessment (EclA), is to determine which ecological feature(s) are of sufficient importance to warrant inclusion in an assessment, with the Chartered Institute of Ecology and Environmental Management (CIEEM) best practice guidelines recommending this approach to ensure attention is focused on those receptors that are susceptible to impact. However, the guidelines also recognise the importance of efforts to ensure protection of biodiversity generally is considered in line with policy requirements. As a result, thresholds for inclusion within an impact assessment are defined as:
 - Any sites, habitats or species that are considered to be of at least local biodiversity value;
 - Sites, habitats and/or species that receive legal protection or are referenced in policy (e.g. Biodiversity Action Plans); and
 - Habitats forming corridors and commuting networks for important species.
- 7 Therefore, only those features that would be of at least local value, subject to legal protection or referenced in planning policy are considered further below. Effects on habitats or species below Local value are unlikely to be significant and will not be considered further.

Biodiversity Context

- 8 The GiGL 'Biodiversity Hotspots for Planning Resource'⁵ identifies the majority of the site to be located within an area where a single potential impact category of either protected site, habitats, and species is present. A small area of the site in the northeast corner falls within an area where two of these categories are present, whilst the northern boundary falls within an area where no known impact categories are present. While this does not confirm the presence or absence of important biodiversity features within the site, it provides context regarding the site's biodiversity potential.

Designated Sites

- 9 The site is not identified as comprising part of a statutory or non-statutory designated site, however, the study area does include a number of potentially relevant sites including 8 statutory designated sites and 23 non-statutory designated sites at the metropolitan, borough and local scales. The sites include the following of particular note for the EclA:
 - Down Lane Recreation Ground Site of Local Importance for Nature Conservation (Local SINC): located approximately 70m to the north of the site
 - Tottenham Hale to Northumberland Park Railsides Site of Borough Importance for Nature Conservation (Borough SINC), approximately 130m east;
 - Tottenham Railsides Borough SINC, approximately 215m east;
 - Allotments in Haringey Local SINC, approximately 365m east;
 - Lee Valley Special Protection Area (SPA), Ramsar and Site of Metropolitan Importance for Nature Conservation (Metropolitan SINC), located approximately 530m to the east of the site;
 - Epping Forest Special Area of Conservation (SAC), located approximately 4.5km east;
 - Walthamstow Reservoirs Site of Special Scientific Interest (SSSI) located approximately 530m east; and
 - Walthamstow Marshes SSSI located approximately 1.7km south.

Habitats

- 10 The site and immediately adjacent areas do not support any notable habitat, comprising Priority Habitats under the UK Biodiversity Action Plan (BAP) or ancient woodland. The desk study confirms the closest such habitat is deciduous woodland located 70m to the north of the site in Down Lane Park. Good quality semi-improved grassland, traditional orchard and open mosaic habitat are also present in the desk study, but all at least 1km from the site.

⁵ Greenspace Information for Greater London (2019) Biodiversity Hotspots for Planning. November 2019.



11 The site is located in an urbanised area of Tottenham Hale and characterised by its urban setting. The site has been largely cleared following the implementation of extant planning application(s) by a different Applicant (planning application references: Outline HGY/2016/4165 and Reserved Matters HGY/2018/2353, and HGY/2019/0108 approved at appeal reference APP/Y5420/W/19/3232707), via the demolition of the previous existing buildings in August 2023, following which the site has been vacant and largely unmanaged. The site now supports a mix of habitats with ruderal/ephemeral vegetation, introduced shrub and sparsely vegetated urban land occupying the southern and northeastern areas with common species for the urban environment present. The habitats are not uncommon in the urban environment and considered to be of biodiversity value **within the immediate survey area only**. The central and northwestern area of the site is dominated by the presence of a large, compacted rubble mound approximately 4m in height that is largely devoid of vegetation and comprises artificial unvegetated unsealed habitat, and whilst it has limited biodiversity value it can provide some sheltering opportunities for invertebrates and as a result is of biodiversity value **within the immediate survey area only**.

12 Hardstanding areas have been retained at the site entrance, along with built linear feature habitat comprising the pavement and road to the east, which are assessed to be of **negligible** biodiversity value.

Biodiversity Net Gain

13 The delivery of a net gain for biodiversity through the development is a key component of planning policy at the national, metropolitan and local scales and a legal requirement as a condition of planning through Schedule 7A of the Town and Country Planning Act 1990 (as amended)⁶. Whilst the habitats on the site are of low ecological value, and fall below the threshold for inclusion in the EIA, the overall effect of the Proposed Development will be considered through a Biodiversity Net Gain (BNG) assessment.

14 Consideration will be given to whether the application should be subject to the statutory BNG requirement as a condition of planning, although irrespective of this consideration will be given to ensure compliance with planning policy relating to this. Therefore, the baseline ecological value of the site will be established using Defra's Statutory Biodiversity Metric to inform the BNG Assessment.

Species

Flora

15 Jersey cudweed (*Gnaphalium luteoalbum*), identified on Schedule 8 of the Wildlife and Countryside Act 1981 (as amended), was identified to be present on the site, with three stands identified in the centre of the site. Although the species is protected through its inclusion on Schedule 8, the warming urban environment provides an opportunity for the species to establish, with the species appearing to be spreading rapidly in the urban environment with new stands establishing across a number of London Boroughs. This is reflected in the Joint Nature Conservation Committee's (JNCC's) recommendation to remove the species from Schedule 8, with an indication that populations in these environments are unlikely to be native in origin and the ease with which they are spreading does not support continued protection in these environments. With this in mind, whilst it remains a protected species the presence of Jersey cudweed is considered to be of biodiversity value **within the immediate survey area only**. However, it remains a constraint to the development as a result of its legal protection that requires mitigation.

16 The vacant site supports a high diversity of colonising species, consisting primarily of a mix of ruderal vegetation, grasses and scattered shrub typical of unmanaged urban land. This includes an abundance of butterfly bush, which is not listed as an invasive species on Schedule 9 of the Wildlife and Countryside Act 1981 but is considered as an invasive species within London. While a wide variety of opportunistic plants have established, the community lacks rare assemblages. Consequently, the flora on site is considered to be of biodiversity value **within the immediate survey area only**.

Breeding Birds

17 The site may provide nesting opportunities for urban bird species, notably within the dense patches of shrub and shrub margins. No trees are located within the site boundary, which restricts the availability of higher canopy nesting features on-site. However, mature trees suitable for nesting birds are located directly adjacent to the west of the site.

⁶ The Town and Country Planning Act 1990 (as amended). His Majesty's Stationary Office (HMSO).



18 The bird species on the site are most likely to be relatively common in the urban environment and of low conservation concern. As a result, the site was considered to be of biodiversity value **within the immediate survey area**, but should nesting birds be present, they would comprise a constraint to development.

Bats

19 The site is considered to provide negligible suitability for commuting and foraging bats, with the vegetation on the site only recently established and therefore foraging resources are unlikely to have sufficiently developed to support regular foraging. The site also contains no potential roost features, and whilst the southern boundary brick wall contains localised areas of missing mortar, the feature is covered by heavy vegetation growth that physically blocks them from entering potential voids. As a result, the site is of negligible value for roosting bats.

20 However, several trees located outside the site, approximately 2m from the western boundary, support potential roost features (PRFs) in the form of cracks within the trunk and knot holes that could be suitable for roosting bats and requires further consideration. In accordance with best practice guidelines, these trees require further evaluation via a Ground Level Tree Assessment to confidently establish the likely absence of bat roosts or the requirement for further emergence surveys should development proposals have potential for adverse effects. Overall, the potential presence of bats utilising the site for foraging, commuting, or opportunistic roosting is considered to be of biodiversity value **within the immediate survey area only**.

Other Species

21 Considering the context of the site and habitats present, no other protected species potentially meeting the threshold for inclusion were considered likely to be present and represent a constraint to redevelopment of the site.

Potential for Likely Significant Effects, Mitigation Measures and Design Recommendations

Impacts

Designated Sites

22 The Proposed Development does not have any direct impacts upon any designated sites and, considering the limited ecological connectivity between the Proposed Development and the majority of the designated sites, and over the distances involved and in the context of the urban environment associated with the site and surrounding area, indirect impacts during construction are considered unlikely.

23 The only exception to this is for Down Lane Recreation Ground Local SINC, Tottenham Hale to Northumberland Park Railsides Borough SINC and Tottenham Railsides Borough SINC. The development has potential for adverse impacts on the designated sites as a result of the generation of dust during trackout and noise generation. However, the impacts associated with these can be mitigated through standard mitigation measures, secured through a Construction Environmental Management Plan (CEMP) and as a result the subsequent effect is unlikely to be significant.

24 Construction impacts associated with dust and noise are not considered likely to be significant upon the Lee Valley SPA and Ramsar, with the site falling outside the area of influence for dust impacts and considering the urban context of the surrounding area noise impacts are not considered likely to be significant across this distance. Furthermore, through a CEMP these impacts can be further reduced.

25 Other indirect impacts during enabling works and construction, such as surface water runoff, are not considered likely to have an adverse effect on non-statutory designated sites considering the context of the site and limited potential for impact pathways.

26 The inclusion of residential typologies on the site could result in adverse effects on designated sites as a result of increases in recreational pressure. The site falls within the Zone of Influence (ZoI) for recreational pressure impacts to the Epping Forest SAC, identified to be 6.2km from the SAC. However, the London Borough of Haringey is not a significant source of visitors to the SAC, as only a small part of the borough falls within the 6.2km ZoI, with less than 1% of visitors originating from the Borough⁷. As the Proposed Development will be car free and utilise an electricity-led Energy Strategy, impacts upon the SAC from the Proposed Development are

⁷ Liley, D. (2020) Epping Forest Visitor Survey (2019). Unpublished report by Footprint Ecology for Epping Forest District Council.



unlikely. As a result, the Proposed Development is not considered likely to have significant effects on the designated site.

27 Recreational pressures on the Lee Valley SPA and Ramsar are controlled through access restrictions and management of the reservoirs. Access to the King George V and William Girling Reservoirs are restricted by permit from Thames Water. The remainder of the site is managed by the London Wildlife Trust as the Walthamstow Wetlands, which is managed to balance recreational pressures and biodiversity with the Walthamstow Wetlands Annual Bird Monitoring Report⁸ identifying that access is managed to limit access to the site's 'core' areas to allow for wildfowl refuge areas. Visitor monitoring (and the recreational impacts that follow) is closely monitored and reviewed as part of a 10-year report and as identified the most sensitive areas that are used by the SPA species have been protected from disturbance through careful control of access across the site. As a result, the Proposed Development is not considered likely to have significant effects on the designated site.

28 The Site of Special Scientific Interest (SSSI) Impact Risk Zone spatial layer identifies that a development of this type in this location may have potential for adverse effects upon a SSSI, however this is related to Walthamstow Wetlands SSSI, which is considered as part of the Lee Valley SPA, with significant effects unlikely to occur with mitigation.

Habitats

29 The Proposed Development does not have any direct impacts on notable habitats and, considering the context of the site and surrounding environment, indirect effects are also unlikely.

30 The habitats present on site are generally common within the urban environment and all habitats fall below the threshold for inclusion within an EcIA. Potential indirect impacts during construction to off-site trees will be protected through mitigation measures secured through a CEMP.

Biodiversity Net Gain

31 Whilst providing an opportunity for enhancement, the beneficial effect associated with the delivery of BNG is unlikely to be significant in EIA terms.

Species

32 Whilst the Proposed Development will have direct impacts upon the Schedule 8 species Jersey cudweed, the loss of the plant is not considered likely to be significant in light of the change in conservation status of populations in London. As a result, the removal of the plant or adoption of mitigation measures under a Natural England Development Licence would satisfy the legal requirements associated with the species.

33 The Proposed Development has the potential for direct and indirect impacts on breeding birds, primarily as a result of the loss of nests or nesting opportunities, direct harm and/or alteration of conditions associated with construction activities (e.g. noise or dust generation). However, through the adoption of appropriate mitigation measures, impacts arising to the species are not considered likely to have a significant effect or breach wildlife legislation.

34 The site is not considered to hold value to bats for commuting/foraging or roosting, and impacts on activity beyond the site during construction are not considered likely with restrictions on working hours and through best practice measures in respect to lighting. There may be potential for indirect effects on roosting bats should the features within adjacent trees be considered suitable for roosting bats, however given the urban context of the site and nature of the features it is not considered likely at this stage that they will comprise a significant roost type and as they are located outside of the site boundary the inclusion of protection measures through a CEMP will ensure likely significant effects are avoided. Indirect effects on surrounding habitats will be managed by a sensitive lighting strategy in line with best practice guidance. As a result, impacts upon bats are not considered likely to have a significant effect or breach wildlife legislation.

Design Measures

35 The redevelopment of the site has an opportunity to enhance the biodiversity value of the site through the inclusion of green infrastructure within the emerging design. This will help increase the value of the site as a

⁸ London Wildlife Trust (2024) Walthamstow Wetlands Bird Monitoring report Year 9: April 2023 to March 2024.



biodiversity resource in its own right, as well as provide connectivity with green spaces and green infrastructure in the surrounding area. Opportunities to enhance the site could include the incorporation of green roof habitat, Sustainable Urban Drainage Systems (SuDS), green walls, street trees and artificial habitat features such as nesting boxes and shelters.

36 Although the site supports some baseline habitats, compensation for the loss of this, if required, would be achievable through the redevelopment of the site such that it is reasonably envisaged that a BNG can be delivered on-site. Where compliance through on-site measures is not possible, offsetting options will be considered.

Mitigation Measures

Habitats

37 Tree protection measures will be implemented in line with British Standard 5837 – 'Trees in relation to design, demolition and construction'⁹ and as instructed by an arboriculturist. The measures implemented should include the establishment of an appropriate Root Protection Area (RPA) for each off-site tree, ensuring the roots are protected from irreversible damage as a result of sustained machinery movements.

38 If the Proposed Development requires incursion into an RPA, the effects of such incursion should be considered by an arboriculturist to ensure the trees are not significantly affected. Similarly, any damage to trees during the construction phase should be reviewed by an arboriculturist and any recommended remedial actions should be carried out as instructed.

Flora

39 Appropriate measures for the loss of Jersey cudweed will be considered and may comprise removal and/or translocation to a suitable area of the development site under a Natural England Development Licence. If translocation of the plant is considered to be appropriate, monitoring to ensure the success of the translocation of the plant will be undertaken and any remedial measures enacted.

40 Invasive species on the site should be removed, and while there are no legislative requirements for their removal and disposal, appropriate care will be required to ensure the plants are fully removed such that they do not regrow and are appropriately disposed of.

Breeding Birds

41 The timing of site clearance for the Proposed Development should give due consideration to the nesting season (typically March to August inclusive), avoiding the sensitive period if possible. Otherwise, a search of the vegetation and adjacent trees should be carried out prior to the commencement of works on site by a suitably qualified ecologist to ensure that no active nests are present.

42 In the event that an active nest is discovered during a search of the site prior to commencement or during the completion of construction works, the structure surrounding and supporting the nest should be retained without alteration until the young have fledged the nest. It may be appropriate to establish a buffer from the nest, with no plant or personnel entering this area until the young have fledged, and the nest should be monitored.

Bats

43 Further targeted survey for bats is required in respect to opportunities for roosting, with a Ground Level Tree Assessment to be undertaken in line with best practice guidance¹⁰. Appropriate measures will be identified according to the findings of the survey to ensure bats are protected through the construction, which may involve a temporary closure of the feature and appropriate compensation. Any works to a roost would need to be completed under a Natural England Development Licence.

44 Best practice measures provided by the Institute of Lighting Professionals (ILP)¹¹ should be adopted in the lighting design for both the construction and operational phases to avoid light spill into the park and trees on the western side of the site.

⁹ BSI (2012) British Standard (BS) 5837:2012 – Trees in relation to design, demolition and construction. British Standards Institute.

¹⁰ Collins, J. (ed) (2023) Bat Surveys for professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

¹¹ ILP (2023) Bats and Artificial Lighting at Night. Guidance Note 08/23. Institute of Lighting Professionals, Rugby.



- 45 Irrespective of the findings of the targeted survey, prior to the commencement of construction works a walkover survey should be carried out to review the potential for the site to support bats and identify any changes to suitability following the completion of the survey to ensure features remain as described in the report accompanying the planning application. The check should be carried out in line with appropriate guidance and with sufficient time for update emergence surveys, should these be required, and the implementation of any mitigation requirements to be put into place.

Best Practice Measures

- 46 There is potential for construction activities to encroach upon habitats and features in the wider environment as a result of their completion, which can have adverse effects on their condition. The establishment of a site boundary will reduce any potential encroachment of on-site activities and site personnel should be informed of the importance of the surrounding habitats through the site induction and toolbox talks.
- 47 Best environment practice measures incorporated into the construction phase and secured through a CEMP, potentially including:
- Measures controlling the generation and transmission of dust in line with best practice guidance from the Institute of Air Quality Management (IAQM);
 - Measures reducing the generation and transmission of noise;
 - Pollution prevention measures including:
 - Ensuring compounds and refueling areas are appropriately located, avoiding sensitive areas where possible, with refueling locations located on an impenetrable base away from the adjacent SINC habitat and appropriately maintained with drip trays and spill kits;
 - Storage areas for fuels, oils and chemicals should be appropriately located on an impermeable surface and with appropriate bunding of sufficient size, where required. The storage location should be more than 10m from any surface water aspect to minimise the potential for spills entering the water environment and should be securely stored;
 - Run-off potentially contaminated with silt or other pollutants should be collected and treated prior to disposal, following an appropriate disposal methodology in compliance with relevant consent requirements;
 - Establishment of a spill response procedure with appropriate location of spill kits and training of staff in their deployment, and development of a contingency plan should contamination of a habitat occur.
 - The principal contractor should appoint a 'Biodiversity Champion', or similar, with responsibility for ensuring mitigation requirements are fully adopted, monitored and to raise awareness of ecological issues on the site. The Biodiversity Champion role should:
 - be familiar with the biodiversity features present on the site and with potential to establish on the site during construction, including their legal protection and mitigation requirements;
 - have sufficient authority to change site practices and take the required action necessary to avoid harm to species present/establishing during construction, and may include the need to temporarily halt works whilst further ecological advice is sought and remedial action taken to avoid harm and/or a legal offence;
 - undertake regular inspection of the construction site, including consideration of mitigation measure implementation to ensure they are effective and appropriate, and give consideration to the potential for species (e.g. breeding birds) to establish on the site during construction;
 - raise awareness of ecological issues associated with the site and the mitigation requirements through targeted staff training, allowing site personnel to understand the ecological sensitivities of the site (or potentially on the site) and associated mitigation measures required. This will allow site personnel to comply with the legal requirements for protecting plants and animals, and could be delivered through the site induction and topic specific toolbox talks as required;
 - input into the construction programme, to ensure ecological enhancement measures are implemented at an appropriate time of year and an appropriate time in the construction programme, to ensure they do not become a constraint to further works;



- oversee the installation of ecological enhancement measures in line with manufacturer recommendations and landscape/ecological guidelines, and maintenance of the features (habitats or artificial species boxes) following installation and up to handover; and
- keep a log of all actions taken for biodiversity, including inspection findings, remedial measures and training undertaken.

Conclusion

- 48 The site is of relatively low biodiversity value, with the recently cleared land now dominated by urban habitats associated with colonising vegetation including ruderal/ephemeral, sparsely vegetated urban land, introduced shrub and artificial unvegetated, unsealed surface habitats that are of low ecological value along with those associated with hardstanding that are of negligible value.
- 49 Whilst the Proposed Development is not part of a designated site, it is located within the Zol of several ecologically sensitive designated sites, most notably the Lee Valley SPA and Ramsar, Epping Forest SAC, Walthamstow Reservoirs SSSI, Down Lane Recreation Ground Local SINC, Tottenham Hale to Northumberland Park Railsides Site of Borough Importance for Nature Conservation (Borough SINC) and Tottenham Railsides Borough SINC, however, as set out above, with the implementation of standard mitigation measures, these are unlikely to be impacted by the Proposed Development.
- 50 On-site ecological receptors are limited to supporting potential for common breeding birds within dense shrub vegetation, the presence of Jersey cudweed and potential for roosting bats associated with features off-site alongside the western boundary of the site.
- 51 The impacts of the Proposed Development can be minimised or negated through the adoption of a range of mitigation measures in the design and during construction. Landscape proposals will provide an opportunity for the delivery of compensation and enhancement, with a view to delivering biodiversity net gain obligations through on-site measures where possible. Landscape proposals for the Proposed Development will provide an opportunity for the delivery of compensation and enhancement, with a view to delivering BNG obligations through on-site measures where possible. During construction, mitigation measures providing specific protection of habitats or species and general best practice measures will minimise the adverse effects of construction activities on biodiversity. A review of mitigation requirements will be made in light of further surveys and as the design evolves and an assessment of the potential for the scheme to deliver on its BNG obligations will accompany the planning application.
- 52 Considering the low baseline value of the ecological features, the anticipated impacts and 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 BNG assessment, will be prepared to accompany the planning application.
- 53 Based on the above, it is proposed that significant effects relating to ecology and biodiversity are considered unlikely and as a result this topic is '**Scoped Out**' of the EIA.



TOPIC SHEET

Ground Conditions and Land Contamination

Introduction

- 1 The need for a ground conditions and land contamination ES chapter has been considered by Whitby Wood Limited.
- 2 A standalone Phase 1 Geotechnical and Geoenvironmental Desk Study incorporating a Preliminary Risk Assessment has been undertaken and is provided in **Annex F**. This will also be updated and submitted to accompany the planning application.
- 3 The desk study included in **Annex F** informs the requirements for detailed ground investigation works, a Generic Quantitative Risk Assessment and recommendations to form part of any Remediation Strategy to be implemented on site.
- 4 It is proposed that this topic is ‘**Scoped Out**’ of the EIA as significant effects relating to ground conditions and land contamination are not likely, as per the Phase 1 Geotechnical and Geoenvironmental Desk Study.

Baseline Conditions

- 5 The site is bound by the Rosa Luxemburg apartments to the north, Ashley Road to the east, 1-21 Hale Road and 2 Ashley Road to the south, and Down Lane Park to the west.
- 6 Historical mapping indicates that the site remained undeveloped until the early 20th century, when it was developed as a braid and bootlace factory. By the late 1930s, the site had been redeveloped as a printing ink and varnish factory, remaining in industrial use until its demolition in the late 1980s. The site was subsequently redeveloped in the early 1990s as the Ashley House residential complex, including associated parking and an electrical substation. Ashley House was demolished in 2024 in line with the extant consent on-site, leaving the site vacant pending redevelopment.
- 7 A summary of the anticipated ground conditions, as identified in the Phase 1 Geotechnical and Geoenvironmental Desk Study, is presented in Table 1.

Table 1 Summary of Geological Stratigraphy from BGS

Stratigraphy	Material Description	Depth (m bgl)	Thickness of Stratum (m)
Made Ground	Variable surfacing and made ground, including concrete, ballast, brick, gravel, clay, sand, timber and rubble.	0.00 to 0.60	0.60
Enfield Silt	Brown clay / sandy clay / silty clay, locally soft to firm.	0.60 to 1.75	0.80 to 1.15
Kempton Park Gravels	Sand and gravel / ballast, locally dense gravel with sand and sandy gravel.	1.75 to 5.35	3.30 to 3.60
London Clay Formation	Blue / grey / brown fissured silty clay, locally stiff to very stiff, with occasional fine sand / silt partings.	5.35 to 21.00	15.75 to 16.30
Lambeth Group	Woolwich and Reading Beds, likely mixed clay / silt / sand strata.	21.00 to 40.00	approx. 19.00
Thanet Sand Formation	Hard Thanet Sand with green flint.	40.00 to 46.50	approx. 6.50
Chalk Group	Chalk with flint, locally hard chalk.	From ~46.50	Proven to approx. 83.90

Note: The depth and thickness of Made Ground may be variable across the site and may include non-natural materials associated with previous development and demolition activities.

- 8 The site is located within the Outer Source Protection Zone II, i.e., the travel time between a pollutant to the protected source is less than or equal to 400 days. The site is located 400m northwest of a Source Protection Zone I. This is associated with the Tottenham Hale reservoir network located approximately 800m southwest of site.
- 9 Localised contaminants are likely to be present due to the high likelihood of Made Ground presence on-site, as well as the use of surrounding areas which include an electricity substation (on-site) and industrial areas.
- 10 A review of the Zetica Unexploded Bomb Risk Map indicates that the site is located within an area of moderate bombing density during WWII. However, based on the overall site history and the resultant risk scoring, the site-specific UXO risk is considered to be high.

Discussion for Scoping Out

- 11 The Phase 1 Geotechnical and Geoenvironmental Desk Study, included as **Annex F** of this EIA Scoping Report, includes a Preliminary Risk Assessment to qualitatively assess potential land contamination and ground-related risks at the site.
- 12 Based on the findings of the Preliminary Risk Assessment and information reviewed to date, the following ground investigations are recommended:
 - Deep boreholes to confirm the ground conditions and inform retaining structure and foundation design;
 - Targeted trial pits and/or enabling works surveys to confirm the presence/extent of buried obstructions such as existing foundations, slabs, tanks, and hardstanding that could affect excavation;
 - Shallow trial pits and/or window samples to assess contamination risks associated with Made Ground and historical site uses; and
 - Groundwater and ground gas monitoring to support the assessment of geo-environmental risks.
- 13 It is anticipated that the ground investigation works will be completed prior to redevelopment of the site to ensure that any geotechnical and geo-environmental risks are appropriately identified and assessed. It is expected that these requirements would be secured through planning conditions attached to any future planning permission.
- 14 The results of the ground investigation will be used to refine the Conceptual Site Model and inform a Generic Quantitative Risk Assessment (GQRA), where required, to assess any potential risks to human health, controlled waters, property and the wider environment.
- 15 Should the risk assessment process identify any contamination risks requiring mitigation, an appropriate Remediation Strategy will be prepared and implemented as part of the development. The strategy will set out



any remediation and verification requirements necessary to ensure the site is suitable for its proposed use and will be agreed with the relevant regulatory authorities and stakeholders, as required.

Enabling Works and Construction

- 16 A Preliminary Risk Assessment has been carried out to set out the potential sources, pathways and receptors in accordance with Land Contamination Risk Management. Receptors during the enabling and construction works include construction workers, off-site public, and off-site developments.
- 17 It is expected that a ground investigation and Quantitative Generic Risk Assessment will be carried out prior to the construction works commencing to inform an appropriate Remediation Strategy for the Proposed Development.
- 18 All construction works, including piling, excavation, spoil handling and disposal, will be undertaken in accordance with an approved Construction Environmental Management Plan (CEMP). The CEMP will set out how construction activities will be managed to control dust, vapours, odours, runoff and other potential emissions, and how impacts on site workers, neighbouring land users and the wider environment will be minimised. The CEMP would be prepared by the Contractor prior to commencement of works and secured through an appropriately worded planning condition, where required.
- 19 A Material Management Plan should be included as part of the CEMP to identify the appropriate method of managing the soil arising from site works.
- 20 A Remediation Strategy, including a watching brief to identify potential contamination for excavated soil and pile arising, will be included as part of the CEMP.
- 21 All relevant legislative and regulatory controls will be adhered to throughout the enabling works and construction works to ensure that risk of potential exposure to contamination is minimised to an acceptable level to prevent any significant adverse effects occurring. This would be detailed in the Remediation Strategy.
- 22 Where proposed construction related activities are likely to generate excess soil arisings (usually from excavated soil and pile arisings), the guidance set out within the CL:AIRE Definition of Waste: Code of Practice will be applied in order to ensure that sustainable re-use of soils is embedded into the design and is compliant with current waste regulations.
- 23 There is a Nitrate Vulnerable Zone within 100m to the east of the site boundary where nitrate concentrations in sources of public drinking water exceed, or are likely to exceed, the EC limit of 50 milligrams per litre as per the purposes of the European Community (EC) Nitrate Directive (91/676/EEC).

Completed Development

- 24 The Remediation Strategy outlined above will need to be implemented and validated during construction works to ensure that the completed development would not give rise to likely significant adverse effects in relation to ground conditions and land contamination.
- 25 A Validation Report is required to be completed by a Qualified Person after the implementation of the proposed Remediation Strategy to confirm the requirements have been carried out accordingly.
- 26 It is anticipated that the Remediation Strategy, Validation Report, and the CEMP would be secured by means of appropriately worded planning conditions.
- 27 On this basis, the planning authority would be able to review and approve the relevant submissions required to address planning conditions relating to ground conditions and land contamination.
- 28 Following implementation and verification of any required mitigation measures, the completed development would be expected to present a low risk with respect to land contamination and ground conditions and would be suitable for its proposed use.
- 29 On the basis of the above, it is considered that the Proposed Development is unlikely to give rise to significant adverse environmental effects in relation to ground conditions and land contamination. A ground conditions and land contamination ES chapter is therefore proposed to be scoped out of the EIA.



Mitigation Measures

- 30 Details of mitigation measures will depend on the outcome of the Ground Investigation works and Generic Quantitative Risk Assessment (GQRA), where required. Any required mitigation measures would be set out in the Remediation Strategy.
- 31 A detailed UXO risk assessment will be required as the Desk Study confirms the risk of UXO as high.
- 32 Typical mitigation measures usually comprise of clean cover systems for soft landscaping, requirements for imported landscaping soils, ground gas protection measures, and appropriate measures to manage contamination risks associated with Made Ground. If additional contamination is encountered (such as high metals or Volatile Organic Compounds (VOC) / Semi-Volatile Compounds (SVOC's)), specialised membrane protection will be required to protect the proposed structure. The requirement for such measures will be confirmed following completion of the Ground Investigation and risk assessment process.
- 33 Soil arisings from excavation, piling and enabling works would need to be classified and managed appropriately. The findings of the Desk Study indicate that Made Ground is anticipated to be present to depths of approximately 0.9m below ground level, although local variations may occur. Where suitable, soils may be reused on-site or off-site in accordance with relevant guidance and regulatory requirements. Any soils exported from site would need to be classified as hazardous or non-hazardous and disposed of or treated accordingly.

Cumulative Effects

- 34 The nature of the Proposed Development poses minimal risk to create new pathways for contaminants. The Phase 1 Desk Study has identified risks of leaching of contaminants, migration to aquifers from piling works and dust migration as potential pathways which may affect neighbouring land.
- 35 Where relevant risks are identified, these would be assessed further through the Ground Investigation and Generic Quantitative Risk Assessment, where required. Any necessary mitigation measures would then be set out within the Remediation Strategy.
- 36 Surrounding cumulative schemes will have a duty to ensure that the potential for contamination will be adequately managed through the preparation and production of a CEMP and/or relevant remediation strategies.
- 37 All schemes will need to ensure that they sign up to the Considerate Constructors Schemes and adopt best practice measures.

Conclusion

- 38 As discussed in the above sections, with the inclusion of appropriate mitigation, management and monitoring measures (to be secured by the RBG through appropriately worded pre-commencement planning conditions) and considering the existing baseline conditions on the site and within the surrounding area, significant environmental effects with regards to ground conditions and land contamination are considered unlikely.
- 39 The Phase 1 Geotechnical and Geo-environmental Desk Study submitted as **Annex F** of this EIA Scoping Report would be updated for final scheme details and submitted in support of the planning application, as required by the RBG validation checklist.



TOPIC SHEET

Human Health

Introduction

- 1 It is considered that significant effects relating to human health are unlikely, and as such this topic is proposed to be '**Scoped Out**' of the EIA
- 2 The need for a human health assessment has been considered by Trium Environmental Consulting LLP, and the following provides a summary of baseline conditions and clarifies why no likely significant effects are expected.

Baseline Conditions

- 3 The site was a former industrial site although it now comprises hardstanding and scrub vegetation. The immediate area surrounding area has recently undergone a transformation from previous industrial sites to mixed-use residential developments.
- 4 The site is well connected to the surrounding area and greater London, with the majority of the site recording a PTAL (Public Transport Access Levels) score of 5, indicating a 'Very Good' level of connectivity. Tottenham Hale station, both underground and overground (servicing the Victoria line and Stansted Express overground line) is located approximately 135m southeast of the site and Bruce Grove Station (serving the Weaver overground line towards London Liverpool Street) is located approximately 670m northwest.
- 5 The site is located in Tottenham Hale ward, which has a relatively young population profile. While the proportion of residents aged 15 years and younger is broadly in line with that of the LBH, London and England, the proportion of working-age residents is notably higher, and the proportion of residents aged 65 years and older is lower than across these geographical comparators¹.
- 6 Tottenham Hale ward has a highly diverse population, with a considerably lower proportion of residents who identify as White than across the LBH, London and England². Consistent with the LBH, residents identifying as Black, Black British, Black Welsh, Caribbean or African comprise the largest ethnic minority group in the ward, whereas residents identifying as Asian, Asian British or Asian Welsh comprise the largest ethnic minority group across London and England.
- 7 Residents of the LBH have life expectancies broadly comparable to the national average and generally experience similar health outcomes. However, as shown in Table 1, mortality rates from cancer and respiratory diseases are marginally lower in the LBH than nationally, while mortality rates from cardiovascular disease and coronary heart disease are marginally higher.

Table 1 Life Expectancy and Cause of Death³

Indicator	London Borough of Haringey	England
Life expectancy for women, years	84.3	83.0
Life expectancy for men, years	79.0	79.1
Deaths from all cancer, all ages, standardised mortality ratio (SMR)	90.0	100.0
Deaths from cardiovascular disease, all ages, SMR	115.9	100.0

¹ ONS (2022). Census 2021: Dataset ID TS007 – Age by single year.

² ONS (2022). Census 2021: Dataset ID TS021 – Ethnic group.

³ OHID (2019-23). Fingertips: Public health data.

Indicator	London Borough of Haringey	England
Deaths from coronary heart disease, all ages, SMR	116.9	100.0
Deaths from stroke, all ages, SMR	100.2	100.0
Deaths from respiratory diseases, all ages, SMR	80.2	100.0
<i>Note: Figures highlighted in red are poorer than the national average, figures highlighted in orange are approximately equal to the national average, and figures highlighted in green are better than the national average.</i>		

- 8 The local economy supports approximately 97,000 jobs within the LBH, with a job density of 0.52 jobs per working-age resident⁴. This is considerably lower than the average job densities recorded for London (1.06) and Great Britain (0.86). The most prevalent industry within the LBH is 'wholesale and retail trade; repair of motor vehicles and motorcycles' (17.3% of employee jobs), whereas the most prevalent industry across London is 'professional, scientific and technical activities' (13.9% of employee jobs). This difference in industrial structure may contribute to the lower median workplace earnings that are observed in the LBH (£882.40 per week) compared with London (£958.20 per week), as 'professional, scientific and technical activities' are typically associated with higher-paying occupations⁵.
- 9 As demonstrated in Table 2 rates of economic activity, employment and unemployment are all worse in the LBH than across London and Great Britain. However, median resident earnings in the LBH (£900.80 per week) are comparable to the London average but higher than the average observed across Great Britain.

Table 2 Employment amongst Working Age Residents (16 – 64 years)⁶

Indicator	London Borough of Haringey	London	Great Britain
Economic activity rate	76.9%	79.9%	79.2%
Employment rate	71.5%	74.9%	75.6%
Unemployment rate (modelled)	7.4%	6.1%	4.5%
Gross weekly pay, full time workers	£900.80	£902.70	£766.60
<i>Note: Figures highlighted in red are poorer than the national average, figures highlighted in orange are about equal to the national average, and figures highlighted in green are better than the national average.</i>			

Discussion for Scoping Out

- 10 A number of key guidance documents relating to the consideration of human health as part of EIA have been published since the inclusion of this topic in the EIA Regulations in 2017⁷. These papers indicate that consideration of human health as a topic should be proportionate and, in most cases, can be scoped out of the EIA:
 - Health in Environmental Impact Assessment – A Primer for a Proportionate Approach (IEMA⁸, May 2017)⁹: "The scoping of population and human health issues into EIA should focus on whether the potential impacts are likely to be significant.";
 - Human health: Ensuring a high level of protection (IAIA, December 2020)¹⁰: "Scoping health should be proportionate. Health effects that are not likely to significantly affect population health should be 'scoped-out'.";
 - Effective Scoping of Human Health (IEMA, November 2022)¹¹; and
 - Determining Significance for Human Health (IEMA, November 2022)¹².

⁴ NOMIS (2024). Labour Market Profile – Haringey.

⁵ NOMIS (2025). Labour Market Profile – Haringey.

⁶ NOMIS (2024). Labour Market Profile – Haringey.

⁷ The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

⁸ Note: IEMA became the Institute of Sustainability and Environmental Professionals (ISEP) in 2025; references to IEMA reflect the organisation's name at the time of publication.

⁹ IEMA (2017). Health in Environmental Impact Assessment – A Primer for a Proportionate Approach.

¹⁰ IAIA (2020). Human health: Ensuring a high level of protection.

¹¹ IEMA (2022). Effective Scoping of Human Health.

¹² IEMA (2022). Determining Significance for Human Health.



11 The IEMA 'Effective Scoping of Human Health' guidelines stipulate that EIA scoping should be proportionate, focusing on the project's likely and potentially significant effects on population health (noting this guidance was produced principally to help guide assessments for Nationally Significant Infrastructure Projects (NSIP)). This guidance has been used to inform this topic sheet with the aim of 'scoping out' human health as an Environmental Statement (ES) chapter, through a discussion of the identified wider determinants of health, using available scheme information, baseline data and professional experience.

12 It should also be noted that, in accordance with IEMA's guidance on 'Determining Significance for Human Health in EIA':

"EIA analysis at the level of individuals would likely mean that all determinants of health conclusions, positive or negative, would be significant on all projects because of the effects to some particularly sensitive individuals. This would be contrary to supporting decision-makers in identifying the material issues. Assessment of EIA significance at the level of individuals is not proportionate."

13 Therefore, human health can be scoped out of the EIA, as there are unlikely to be significant population-wide human health effects as a result of the Proposed Development.

Enabling Works and Construction

14 Given the size and nature of the Proposed Development, there is the potential for enabling works and construction on-site to result in temporary adverse impacts on human health for nearby local residents, particularly in terms of air quality, noise and vibration, and traffic congestion. However, these are expected to be mitigated against appropriately through relevant construction strategies (such as a Construction and Environmental Management Plan (CEMP)) and best practice. With appropriate mitigation in place, this phase should only result in Negligible to Minor Adverse (not significant) residual effects on human health in EIA terms, with further detail of these methods to be provided within the relevant technical topics of the ES and supporting planning deliverables.

15 The enabling works and construction may also provide temporary employment opportunities for local people; however, given the size and mobility of the construction sector (280,000 jobs in the construction sector across London¹³), this phase is likely to only have a Negligible to Minor Beneficial (not significant) residual effect on human health.

Completed Development

16 The Proposed Development is expected to provide up to 540 shared-living units and 87 affordable residential units. In accordance with London Plan Policy H1 'Increasing housing supply', non-self-contained communal accommodation contributes towards housing targets at a ratio of 1.8:1, with 1.8 units counting as a single home¹⁴. This ratio has therefore been applied to the 540 shared-living units, resulting in an equivalent contribution of 387 homes towards the LBH's 10-year housing target of 15,920 new homes¹⁵ (approximately 2.4% of the target). Although this quantum will be a benefit for local people, and potentially significant in socio-economic terms, the proposed mix is only likely to result in Minor Beneficial (not significant) effects on human health at the population level.

17 In addition to the Proposed Development's contribution towards local housing targets, the scheme will deliver up to 500m² of flexible ancillary nursery, commercial/ employment and community floorspace, as well as landscaping, open and play space, and public realm enhancements. Although these measures represent a clear benefit for local people, they are unlikely to generate notable significant effects on human health in EIA terms and will instead be considered qualitatively within a standalone Health Impact Assessment (HIA).

18 Once complete and operational, the Proposed Development will result in a net gain of employment on-site, due to the provision of up to up to 500m² of flexible ancillary nursery, commercial/employment and community floorspace on a site that currently generates no employment. These spaces will generate employment and associated employee spend, much of which is expected to be retained within the local area. However, given the



limited quantum of employment generating floorspace and the size of the LBH workforce (97,000 jobs), this is also expected to result in a beneficial but ultimately not significant effect on human health.

19 The Proposed Development is expected to be designed in line with relevant accessibility legislation, although details of these provisions are still being refined. With acceptable baseline accessibility and transport conditions, and this understanding of current designs, the Proposed Development is not expected to have any material impact on accessibility on-site and in the wider region. The Proposed Development's impact on accessibility and active travel is therefore likely to result in Minor Beneficial (not significant) effects on human health.

20 Whilst the Proposed Development may introduce a nursery, it neither removes nor introduces core social infrastructure such as healthcare facilities or primary and secondary schools. Whilst the introduced population may increase pressure on existing nearby social infrastructure, including primary healthcare and primary and secondary education, this is not expected to have human health implications, and its socio-economic implication will be addressed through a Socio-Economics ES chapter. With appropriate mitigation payments agreed, effects on human health are anticipated to be Negligible (not significant).

21 Once complete and operational, the Proposed Development does not introduce infrastructure, facilities or other receptors which are expected to have a significant adverse effect on human health in terms of environmental or social risks. Any potential adverse effects relating to environmental and social risks are expected to be mitigated against appropriately through good design, relevant legislation and best practice to result in Minor to Negligible (not significant) effects on local human health.

Mitigation Measures

22 Mitigation measures embedded into the scheme which will appropriately address any likely adverse effects on the health of the local population, and reduce wider health inequalities, include but are not limited to:

- A CEMP to reduce impacts during the enabling works and construction such as poor air quality, noise and vibration, and resident inconvenience during anti-social hours;
- The provision of quality housing in a range of sizes and tenures;
- The provision of public realm enhancements, public open space, landscaping and play space;
- The provision of non-residential floorspace including commercial and community spaces; and
- The provision of a high-quality development designed in line with appropriate guidance and legislation.

Conclusion

23 The scoping exercise outlined above, based on available baseline data and emerging scheme information, finds 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. There are also not anticipated to be significant cumulative effects as a result of the Proposed Development due to its size, nature and local context. It is therefore proposed that human health is '**Scoped Out**' of the EIA.

24 Although human health can be scoped out of the EIA, it will still be considered in the wider planning application in an HIA, as per the London Plan and the Haringey Local Plan. This will ensure that the non-significant and less quantifiable beneficial impacts identified in this exercise are still considered within the planning application, including recommendations for reasonable mitigation, enhancement and monitoring where appropriate.

¹³ NOMIS (2025). Labour Market Profile – London. Labour Demand.

¹⁴ GLA (2021). The London Plan: The Spatial Development Strategy for Greater London. Policy H1 'Increasing housing supply'. Paragraph 4.1.9.

¹⁵ GLA (2021). The London Plan: The Spatial Development Strategy for Greater London. Policy H1 'Increasing housing supply'. Table 4.1.



TOPIC SHEET

Project Vulnerability

Introduction

- 1 It is considered that significant effects relating to project vulnerability are unlikely and as such this topic is 'Scoped Out' of the EIA.
- 2 With reference to Regulation 4(4) and Schedule 4 of the EIA Regulations, this section considers whether there are likely to be any significant effects on the environment or the development arising from the vulnerability of the Proposed Development to major accidents or disasters.
- 3 Paragraph 8 of Schedule 4 of the EIA Regulations (as amended) provides a description of the information to be provided in the ES in relation to these events. In line with this description, this information is of key importance for the assessment of major industrial and/or infrastructure schemes which could pose significant risks to society and the environment in the event of a major accident or a natural disaster which would impede its normal function (e.g. nuclear/petrochemical installations, major transport infrastructure such as tunnels, bridges or airports, etc.). While the Proposed Development does not fall into these scheme categories, the project's vulnerability to such events has nevertheless been taken into consideration to ascertain the potential risks to future site users and surrounding human and environmental receptors.
- 4 Guidance has been made available by ISEP (IEMA Major Accidents and Disasters in EIA: A Primer¹) and which clarifies the definitions of major accidents and disasters to the following:
 - Disaster – "may be a natural hazard (e.g. earthquake) or a man-made/external hazard (e.g. act of terrorism) with the potential to cause an event or situation that meets the definition of a major accident"; and
 - Major accident as "events that threaten immediate or delayed serious environmental effects to human health, welfare and/or the environment and require the use of resources beyond those of the client or its appointed representatives to manage. Whilst malicious intent is not accidental, the outcome (e.g. train derailment) may be the same and therefore many mitigation measures will apply to both deliberate and accidental events".
- 5 Specifically, and as noted in the ISEP guidance, a development should be screened to determine its potential to result in likely significant effects from major accidents and natural disasters. The following questions are posed to help determine a view on this:
 - "Is the development a source of hazard itself that could result in a major accident and/or disaster occurring?"
 - Does the development interact with any sources of external hazards that may make it vulnerable to a major accident and/or disaster?
 - If an external major accident and/or disaster occurred, would the existence of the development increase the risk of a significant effect to an environmental receptor occurring?"

Assessment of Effects

- 6 In line with the above questions, given its intended scale and uses, it is considered the Proposed Development would be unlikely to result in significant effects from most major accidents and natural disasters. The Proposed Development is not a source of hazard itself, nor does it interact with any sources of external hazards that make it vulnerable to a major accident or disaster.

- 7 The guidance further states that:
"Not all potential events will fall into the scope of a major accidents and/or disasters assessment. The level of risk therefore needs to be defined to inform what types of events are within the scope of the major accidents and/or disasters assessment".
- 8 The London Resilience Partnership has developed the London Risk Register², which lists a range of natural hazards and man-made accidents/incidents and assesses the risks they pose to the London area based on their potential impact and likelihood. As well as assessing the risk of these events, the London Risk Register also provides an outline of the control measures in place to avoid, manage and respond to them. These measures range from specific laws and regulations intended to avoid or manage the potential causes of major accidents and natural disasters, to government agency programmes intended to prevent, inspect and monitor these causes, as well as a variety of response plans, forecasting and early warning systems. The effective implementation of these plans, programmes, legislative tools and guidance is considered to reduce the risk of these events to a level which is as low as reasonably possible.
- 9 Due to the nature and surroundings of the Proposed Development, many of the events listed in the London Risk Register (e.g. wildfires, animal diseases, etc.) are not considered relevant or likely to pose a risk to future site users or surrounding receptors. The remaining events in the London Risk Register will be managed, or altogether avoided, through the aforementioned established regulatory framework and the control measures implemented at the local and/or national government level, with the support of specialist government agencies.
- 10 In some cases, this risk management process will be further supported with project-specific information and assessments which form part of the EIA and the wider planning process. This includes the assessment of potential weather-related events, such as those relevant to the wind microclimate assessment, which under certain conditions could pose a risk to pedestrians and/or vehicle users. Likewise, the requirement for a Flood Risk Assessment within the planning application will address the flood related risks as listed in the London Risk Register.
- 11 The major accidents or disasters listed in the London Risk Register that are considered relevant to the Proposed Development are outlined in Table 1 below:

Table 1 Major Accidents or Disasters Relevant to the Proposed Development

Categories / Description	LRP Risk Rating	Potential for Proposed Development to Exacerbate Effects on Environmental Receptors	Scoped In / Out
Natural Hazards			
Human Diseases / Human Health Incidents: For Influenza and Emerging disease outbreaks (Pandemic).	High to Very High	The spread of human disease is more likely in areas with a higher population density. Because the Proposed Development introduces new residential and flexible commercial uses, while also providing a new public realm (where people will congregate), it has the potential to exacerbate effects relating to human disease and health. The influx of new residents to the area, as a result of the Proposed Development, won't be significant due to the existing residential developments in the area. A standalone human health topic sheet has been produced providing further detail on the scoping out of a standalone health ES chapter and instead the submission of a Health Impact Assessment, as a separate planning deliverable in support of the planning application. Government guidance shall be followed as appropriate to the circumstances to respond to and manage any potential further pandemic or outbreak of a new or emerging infectious disease. The risk management process is Government driven using legislative controls where necessary. Hospital and healthcare facilities in the local area will in either case be familiar with addressing the challenges around managing potential infectious disease outbreaks. There are suitable resources within the local area to respond to such an event. It is not considered that the vulnerability of the Proposed Development to these events would in any way worsen effects for any other nearby receptors.	Out

¹ISEP (formerly IEMA) (2020): 'Major Accidents and Disasters in EIA: A Primer'.

² London Resilience Partnership February (2022): 'London Risk Register'. Accessible at <https://www.london.gov.uk/what-we-do/fire-and-resilience/london-resilience-partnership/london-risk-register>



Categories / Description	LRP Risk Rating	Potential for Proposed Development to Exacerbate Effects on Environmental Receptors	Scoped In / Out
<u>Flooding</u> : Covering a range of scenarios including fluvial, surface water run-off and tidal flooding and combinations thereof.	<u>High to Very High</u>	The application will be supported by a Flood Risk Assessment and Sustainable Urban Drainage Systems (SuDS) Strategy setting out the SuDS to be incorporated into the Proposed Development; these documents shall be summarised within the Environmental Statement (ES). Any potential flood risks identified as part of the Flood Risk Assessment will be addressed by identifying suitable mitigation measures that will be embedded into the design of the Proposed Development. Similarly, a suitable Sustainable Drainage System Strategy will be prepared to ensure the drainage strategy complies with local and national guidance, incorporated into the design of the Proposed Development.	Out
<u>Severe Weather</u> : Including drought, severe storms, low temperatures / heavy snow and heatwaves.	<u>High</u>	Water usage within the operational Proposed Development could contribute to the depletion of limited water resources in times of severe drought. This shall be addressed through the implementation of appropriate design and operational principles to ensure efficient use of water on-site, in line with local planning policy. The Proposed Development would result in new site users which could potentially be affected by prolonged periods of excessive hot or cold weather, should it arise. The Proposed Development will be built to the latest Building Regulations requirements. Where considered appropriate and suitable for the Proposed Development, appropriate internal thermal comfort will be managed through mixed mode ventilation systems allowing both natural and mechanical ventilation to be applied. With regards to severe storms involving high wind speeds, the effects of the Proposed Development on the local wind microclimate will be assessed in the EIA. While the assessment will only account for predominant local wind conditions, any adjustments to scheme to mitigate effects on pedestrian safety and comfort criteria will contribute to reducing the vulnerability of the Proposed Development under more extreme wind conditions. Further information on the assessment of wind effects in the EIA can be found in the wind microclimate topic sheet. A standalone climate change topic sheet has been produced providing further detail on the scoping out of a standalone climate change ES chapter In the majority of these severe weather scenarios, it is considered the main risks to site users on the Proposed Development will be during the travel to and from the site, and for those working at / visiting the Proposed Development. In such weather events it is assumed that employers will often respond to extreme weather forecasts and warnings by advising their employees not to travel to work, and that retail, commercial and community use visitors would review the weather forecast prior to visiting. In any case, the Proposed Development will adhere to the latest Building and Health Safety Regulations to ensure site users are protected from external weather conditions.	In (relating to high wind speeds)
<u>Structural Incidents</u> : Relating to land movement.	<u>Medium</u>	The Proposed Development will be subject to the most up to date construction, maintenance and demolition standards (once decommissioned). The site is not located near any geological features likely to be affected by landslides.	Out
<u>Severe Space Weather</u> : Relating to the effects of solar winds and its potential effects on power distribution networks, satellite services, aviation and other digital systems.	<u>Very High</u>	Due to the nature and wide scale of effects which could result from severe space weather, there are limited measures which could be put in place to limit the vulnerability of the Proposed Development to such events. It is not considered however that the vulnerability of the Proposed Development to these events would in any way worsen effects for any other nearby receptors.	Out
Man-Made Major Accidents and Incidents			
<u>Major Industrial Accidents</u> : Covering a range of scenarios involving explosions, fires and the release of a range of hazardous and combustible materials from industrial processes. Other scenarios	<u>Low to High</u>	There are a significant number of potential scenarios which are considered in the London Risk Register under this category. Most of these scenarios are specific to industrial facilities and infrastructure which due to the intended use of the Proposed Development are not considered relevant. Of the scenarios considered, the ones considered relevant include localised fires and building collapse. These will be managed outside of the EIA process through a combination of legislative and industry guidance which mitigate the risk of fire and/or structural collapse causing a major	Out



Categories / Description	LRP Risk Rating	Potential for Proposed Development to Exacerbate Effects on Environmental Receptors	Scoped In / Out
considered include structural collapse of a man-made structures and technical failures in industrial facilities.		accident in new developments within the urban environment. Legislative requirements include the 'The Construction (Design Management) Regulations 2015'³, which provide guidance on fire safety requirements for new buildings, while requirements under the Building Regulations and associated guidance relate to the structural safety and broader health and safety considerations for people in and around buildings. Compliance will also be achieved by adopting structural and fire engineered solutions where the size and scale of the development necessitates bespoke measures to address these risks.	
<u>Major Transport Accidents</u> : Considers a range of transport related accidents for different modes of transportation, including road, air, rail and sea.	<u>Low to High</u>	The Proposed Development is located approximately 135m northwest of the Tottenham Hale National Rail and London Underground Station, and approximately 940m northeast of the Seven Sisters London Underground Station. Both railway drivers and road users will be considered in relation to any potential effects arising from instances of solar glare. There is limited potential for solar glare effects to road users. In the event of a major transport accident affecting the site, it is thought the Proposed Development would not exacerbate effects on nearby receptors. Tall building developments need to be assessed to determine if they pose a risk to air traffic. As the closest airport to the site (the London City Airport) is located approximately 11km southeast of the site, it is considered the scheme does not pose any risk to air travel and this assessment has been 'Scoped Out' of the EIA.	Out
<u>Disruptive Industrial Action</u> : Covering industrial action by workers in a range of public and other services industries.	<u>Medium to High</u>	It is anticipated that site users of the Proposed Development could be subject to the effects of industrial action in key services and emergency response sectors, but this will not be any more so than for other surrounding sites in the area. In no case is it anticipated that the effects of these events on nearby receptors would be magnified by any vulnerability of the Proposed Development.	Out
<u>Public and Crowd Events</u> : Relating to the mass influx of non-resident British nationals and public disorder	<u>Medium</u>	Given the intended use for the site, it is not anticipated that the Proposed Development will cause an influx of non-resident British nationals and cause public disorder relating to the crowds associated with a public event.	Out
<u>Malicious Attacks</u>	<u>High to Very High</u>	The location of the Proposed Development means it is an unlikely area to be targeted for malicious attacks.	Out

- 12 In line with the above, within the context of the events assessed in the London Risk Register, 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 further significant effects on introduced site users, and surrounding environmental and human receptors.

Discussion for Scoping Out

- 13 In line with the above, 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.
- 14 Therefore, project vulnerability to major accidents and natural disasters is 'Scoped Out' of the EIA. An assessment of wind microclimate will be included as a chapter of the ES.

³ Health and Safety Executive (2015), The Construction (Design and Management Regulations) 2015



TOPIC SHEET

Traffic and Movement

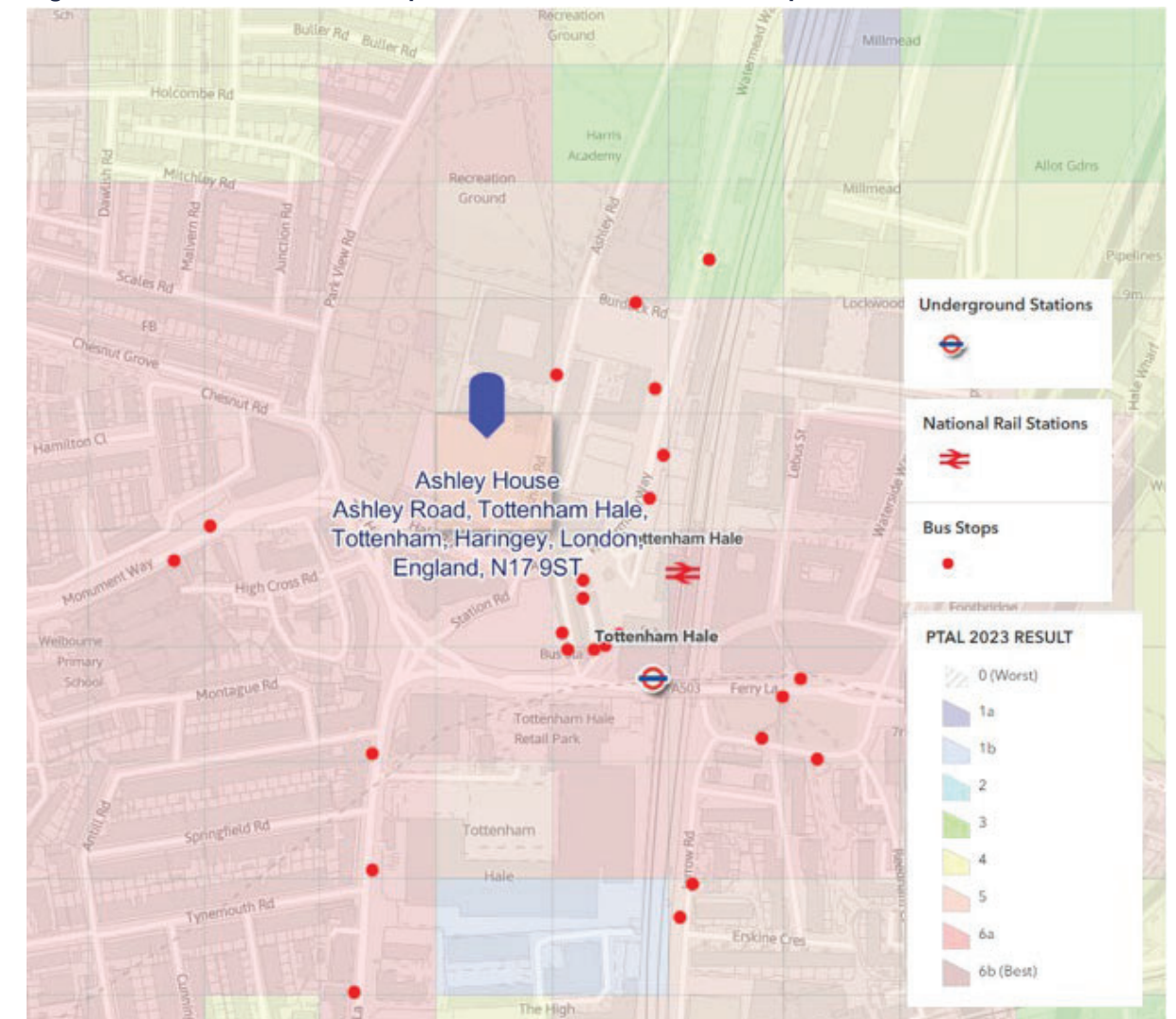
Introduction

- 1 The need for a traffic and movement ES chapter has been considered by Tetra Tech Consulting Limited.
- 2 It is considered that no significant effects relating to traffic and movement are likely, particularly when considering the expected forecast trips for the Proposed Development, and as such, this topic is **'Scoped Out'** of the EIA. Justification for this is provided within this topic sheet.
- 3 A Transport Assessment/ Framework Travel Plan/ Delivery and Servicing Management Plan/ Outline Construction Logistics Plan will be prepared and submitted in support of the planning application, as required by the LBH validation checklist.

Baseline Conditions

- 4 The site is located in Tottenham Hale within the London Borough of Haringey (LBH), in an area of mixed character that includes industrial, commercial, retail and residential uses. The site lies along Ashley Road and comprises a parcel of land fronting Ashley Road to the east and Down Lane Park to the west. The site is currently vacant and undeveloped.
- 5 Using TfL's WebCAT planning tool, a Public Transport Access Level (PTAL) has been extracted to identify the level of accessibility surrounding the site.
- 6 The PTAL is a measure of access to the public transport network, combining walk times from a chosen point to the network together with service frequency data at these locations. This indicator is assessed on a scale of nine levels from 0, being the lowest accessibility level, to 6b, being the best accessibility level. WebCAT provides pre-calculated grid points covering the whole of London.
- 7 The extracted PTAL for the site is 5, indicating a high level of public transport accessibility. This is due to the close proximity of Tottenham Hale Station, Tottenham Hale Bus Station and Tottenham Hale Underground Station, together with the range of local bus services available in the immediate area.

Figure 1 Site Area PTAL Map with Train Stations and Bus Stops



Source: TfL WebCAT Service¹

- 8 Tottenham Hale Station is located approximately 135m from the site and provides access to the Victoria Line and National Rail services, offering direct connections to central London and beyond.
- 9 Tottenham Hale Bus Station is located approximately 75m from the site, with bus stops also present on Watermead Way. The site is served by bus services 41, 76, 123, 192, 230, W4, N41 and N73, providing direct connections to surrounding areas and onward public transport interchanges.
- 10 The site is also well connected for walking and cycling. Well-established footways, signal-controlled crossings, raised tables and wide pedestrian routes are present in the vicinity of the site, providing direct and convenient access to surrounding destinations. In addition, the site is within reasonable cycling distance of London Cycleway 1, Cycleway 24 and National Cycle Route 1.
- 11 The site is in a highly accessible and sustainable location with a full range of work, education, retail, leisure and green space opportunities within a short walk or cycle ride of the site. Local destinations include Bruce Grove Town Centre, Tottenham Hale Retail Centre, Down Lane Park, schools, medical facilities and places of worship.
- 12 The surrounding highway network is formed primarily by Ashley Road, Burdock Road and Watermead Way. Ashley Road is a one-way route with a 20mph speed limit, while Burdock Road is a two-way local road. The area includes signalised junctions with pedestrian phases and forms part of a Controlled Parking Zone (CPZ), specifically The Hale CPZ, which assists in managing on-street parking demand.

¹ [WebCAT 3.0 - Web-based Connectivity Assessment Toolkit](#)



- 13** The existing site is currently vacant and undeveloped, with no active operational use and therefore no existing trip generation. The previous buildings have been demolished and the site does not currently function as an occupied or trip-generating use.
- 14** Overall, the baseline conditions demonstrate that the site is in a highly sustainable location with excellent public transport connectivity, strong walking and cycling links, and access to a wide range of local services and amenities. Whilst the local highway network is busy and includes vulnerable road user movements, the site itself is currently vacant and does not generate vehicle movements in its existing state.

Discussion for Scoping Out

- 15** The Guidelines for the Environmental Assessment of Road Traffic updated and replaced in July 2023² address specific traffic and movement related impacts, consistent with, but expanding upon, the categories identified in the 1993 Guidelines³, including:
- Severance of Communities;
 - Road vehicle driver and passenger delay;
 - Non-motorised user delay;
 - Non-motorised amenity;
 - Fear and intimidation on and by road users;
 - Road user and pedestrian safety; and
 - Hazardous / Large loads.
- 16** The 'IEMA 2023' guidance sets some useful criteria for determining a study area in paragraph 2.16 which has been used for context:
- Rule 1: Include highway links where traffic flows will increase by more than 30% (or the number of HGVs will increase by more than 30%); and
 - Rule 2: Include highway links of high sensitivity where traffic flows have increased by 10% or more.
- 17** This following section sets out why potential significant effects are not anticipated.

Enabling Works and Construction

- 18** In considering the traffic implications of construction traffic, it is noted that construction traffic is present for just a temporary period. Construction traffic will arrive at regular times over the course of a day to match the needs of the site and will be regulated by the site construction hours restricted to weekday and to lunchtime on Saturdays with no works on Sundays and on bank holidays, in line with London Borough of Haringey's (LBH) restricted construction hours of work.
- 19** The anticipated number of vehicle trips by construction traffic are likely to be of a level that can be managed uniformly across a day. There will be additional Heavy Goods Vehicle (HGV) movements accessing the site during the construction phase, but the nature of the local highways means that this additional activity will not be significantly noticeable to any sensitive receptor, and can be managed to ensure HGV movements are restricted to appropriate roads and not local roads (except when accessing the site from Ashley Road). HGV trips will also likely be scheduled outside of peak traffic hours, which will avoid additional potential congestion on the surrounding road network during these peak times.
- 20** Suitable mitigation measures to ensure potential impacts on surrounding sensitive receptors (i.e. pedestrians, cyclists and other road users) are reduced, 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.
- 21** It is also expected that construction workers would make use of public transport to get to and from the site due to the good availability of public transport options in the area, with no on-site parking to be provided. Due to the number of routes to and from the site via public transport it is expected that additional trips would be split across

² IEMA, 2023. Guidelines for the Environmental Assessment of Road Traffic.

³ IEMA, 1993. Guidelines for the Environmental Assessment of Road Traffic.



the network and would negligibly influence total passenger numbers. A Travel Plan would be prepared for the enabling and construction works to encourage sustainable travel to and from the site.

Severance

- 22** Construction vehicles are expected to primarily use the strategic road network which already carry high volumes of HGVs. Therefore, the Proposed Development is not expected to exceed the 30% threshold for vehicle or HGV flow. Severance is therefore scoped out for the construction phase assessment.

Delay

- 23** When considering potential changes to pedestrian, cyclist and rail delays, the following reasons provide the basis for scoping these topics out when considering other effects to consider where there are expected layout changes or changes in to traffic volumes, or new facilities such as crossings:
- Pedestrian Delay – No roads or pedestrian routes are expected to be closed during construction. The site access for construction vehicles will be actively managed to safely allow HGV's to enter/exit the site. Given the expected daily construction vehicle numbers this occurrence is expected to be low and will also be undertaken quickly therefore not materially impacting pedestrian journeys
 - Cyclist Delay – No roads or cycle routes are expected to be closed during construction. The site access for construction vehicles will be actively managed to safely allow HGV's to enter/exit the site. Given the expected daily construction vehicle numbers this occurrence is expected to be low and will also be undertaken quickly therefore not materially impacting cycle journeys

Public Transport Delay

- 24** The construction phase is not expected to result in any changes that would significantly impact the public transport network. Whilst there would be an increase in public transport users during peak times, these would be split across multiple options across the transport network and so would be unlikely to result in a significant uplift in the network.

Amenity, Fear and Intimidation

- 25** Following the completion of the development there is expected to only be minimal vehicle and delivery movements with very low numbers of HGVs (weekly refuse collection). Therefore, it is not expected to result in changes that could affect perceptions of amenity, fear and intimidation.

Accidents and Safety

- 26** Road safety will also be further managed and mitigated through the CLP and Construction Logistics and Community Safety (CLOCS) scheme and use of contractors registered on the Considerate Contractors Scheme (CCS). CLOCS brings the construction logistics industry together to improve the management of work-related road risk and ensure a road safety culture is embedded across the industry.

Hazardous / Large Loads

- 27** Hazardous Loads are specialist loads such as explosives or highly flammable materials. There will not be any of these types of deliveries throughout the construction stage of the development.
- 28** With the implementation of good practice measures during the enabling works and construction, significant effects on sensitive receptors are considered unlikely from construction related traffic and movement.

Completed Development

- 29** With regards to operational traffic, the traffic forecasts for the Proposed Development have been forecast using the industry standard TRICS database. This database contains a wide range of surveys undertaken at existing residential and commercial developments that have comparable characteristics to the Proposed Development.

Severance

- 30** There will be a very slight increase of approximately 50-60 vehicular trips (subject to change given the design of the Proposed Development is still evolving) across the local network when comparing the Proposed Development use against the existing site use as a result of the existing site being vacant.
- 31** No parking is proposed on-site except for 10 blue badge parking bays. The site is highly accessible, and the combination of low parking access and excellent public transport encourages people to use other, more



sustainable modes of transport minimising any impacts on nearby residential streets. In addition to low vehicle movements from blue badge parking other vehicle movements will be from delivery/servicing vehicles and taxis.

- 32 The Proposed Development is not expected to result in changes which could detrimentally affect perceptions of severance during operation. This volume of trips is expected to be imperceptible on the wider network with approximately a 6% increase on Ashley Road and less than 0.2% increase on Watermead Way. Severance is therefore scoped out for the operational phase assessment.

Pedestrian/ Cycle Delay

- 33 The IEMA guidelines require that effects on pedestrian delay be considered for road links where two-way traffic exceeds 1,400 vehicles per hour. As the operation of the Proposed Development will marginally increase traffic compared to the existing site use, it is considered that the impact on pedestrian and cycle delay will be negligible. The effect is therefore unlikely to be significant.

- 34 The Proposed Development will deliver new pedestrian and cycle improvements across the site creating improved permeability across the wider area, including providing a new link between Ashley Road and Down Lane Park.

Public Transport Delay

- 35 The completed development is not expected to result in any changes that would significantly impact the public transport network. Whilst there would be an increase in public transport users during peak times, these would be split across multiple options across the transport network and so would be unlikely to result in a significant uplift in the network.

Vehicle and Bus Delay

- 36 There are no major changes to the surrounding highway network around the site. The proposal will reuse existing vehicle access, and the expected low vehicle numbers would not significantly impact vehicle or bus delay.

Amenity, Fear and Intimidation

- 37 Following the completion of the development there is expected to only be minimal HGV movements to and from the site being limited to the weekly refuse collections. Therefore, it is not expected to result in changes that could affect perceptions of amenity, fear and intimidation given the nature of the surrounding highway network.

Accidents and Safety

- 38 The potential for changes to Accidents and Safety can relate to the increased use of the transport network, however the greatest potential for change relates to more fundamental street and junction layout changes such as a new access or pedestrian/ cyclist crossing. The highway and pedestrian network surrounding the site provides excellent and safe crossing facilities which will be improved further in the future by the introduction of dedicated cycle lanes on Beresford Street.

- 39 The Proposed Development is not expected to result in changes which could affect accidents and safety during operation. New and improved routes for pedestrians and cyclists will be provided, including traffic free spaces. No material changes to the public road network are anticipated aside from landscaping/ surfacing improvements but these would not constitute changes which would affect accidents and safety. Therefore, the Proposed Development is unlikely to result in significant effects to accidents and safety once operational.

Hazardous Loads

- 40 Hazardous Loads are specialist loads such as explosives or highly flammable materials.
- 41 The operational Proposed Development is not expected to generate or attract hazardous loads and so significant effects with regards to hazardous loads are considered unlikely.

Mitigation Measures

- 42 Mitigation measures and enhancements integral to the Proposed Development (embedded mitigation) will form part of the transport strategy, such as the new pedestrian and cyclist connections and cycle parking provision, in addition to large areas of new public realm. These will be detailed within the Proposed Development ES chapter and within the Transport Assessment submitted as a standalone planning deliverable. Management plans required by planning policy will be prepared and will accompany the planning application. This includes a



Framework Travel Plan, Outline CLP and Delivery and Servicing Management Plan. These will be set out as part of the TA and listed as part of the **Mitigation and Monitoring** chapter of the ES.

- 43 In addition to trips generated directly by new residents themselves, an increase in delivery vehicles is expected. It should be noted however, that over the years, delivery companies such as DHL, FedEx, DPD etc. have invested heavily in route optimisation technology. As a result, new residents do not mean a proportional increase in delivery vehicle numbers i.e. if DPD is delivering to existing estate residents, they will not send entirely new vehicles to deliver to new residents as deliveries will be consolidated to reduce the operator's costs.

- 44 It is not considered that any effects arising from transport effects would require mitigation to reduce the scale or significance of effect.

Cumulative Effects

- 45 The surrounding area is undergoing significant development change with a large range of new development across all sectors. Given the sites excellent public transport accessibility and car free proposals with limited overall new vehicle trips, cumulative issues with regards to traffic and movement are not expected.

- 46 Other construction activity will also be managed through a CLP and CEMP and will be reviewed and approved by LBH/TfL at the planning application stage, as well as prior to construction to ensure as much construction coordination with other sites (including managing peak construction vehicle movements).

Conclusion

- 47 As discussed in the above sections, with the inclusion of appropriate mitigation measures and considering the existing baseline conditions on the site and within the surrounding area, significant environmental effects with regards to traffic and movement are considered unlikely, and therefore traffic and movement is proposed to be '**Scoped Out**' of the EIA.

- 48 A Transport Assessment/ Framework Travel Plan/ Delivery and Servicing Management Plan/ Outline Construction Logistics Plan will be prepared and submitted in support of the planning application, as required by the LBH validation checklist.



TOPIC SHEET

Waste and Materials

Introduction

- 1 It is considered that significant effects relating to waste and materials are unlikely and as such these topics are **'Scoped Out'** of the EIA. Further detail is provided below.
- 2 IEMA's guide to Materials and Waste in Environmental Impact Assessment¹, refers to different types of mitigation measures to prevent or reduce significant adverse effects relating to materials and waste:
 - Primary mitigation measures: are *"an intrinsic part of the development, and do not require additional action to be taken"*²; for example, choosing to refurbish an existing building, rather than demolish it;
 - Secondary mitigation measures: are *"foreseeable actions brought out by the environmental assessment process, and that have not previously been achieved through primary and tertiary mechanisms"*³; for example, the implementation of a **Construction Environmental Management Plan (CEMP)** (or equivalent) or **Operational Waste Management Strategy (OWMS)**; and
 - Tertiary mitigation measures: are *"those that are in place with or without the iterative EIA process"* and include *"those that will be undertaken to meet existing legislative requirements, of those that are considered standard practices used to manage commonly occurring environmental effects"*⁴; for example, sending waste to active and permitted waste management sites, which have to adhere to the requirements of the Environmental Permitting Regulations⁵, whereby carrying out certain types of activity (such as receiving waste for landfill) requires an active and permitted waste management site to hold an environmental permit to do so.

Materials

Enabling Works and Construction

- 3 During the enabling works and construction, it is anticipated that the majority of materials for constructing the Proposed Development will be sourced from:
 - The site, in terms of any 'waste for recovery'⁶; and
 - Within the London Borough of Haringey (LBH) and London.
- 4 In accordance with IEMA's guide to Materials and Waste in Environmental Impact Assessment, materials are sensitive receptors and include *"physical resources that are used across the lifecycle of a development. Examples include concrete, aggregate, asphalt, bricks, ballast, mortar, glass and timber."*
- 5 The site benefits from having the existing buildings located on-site demolished under the extant consent, and therefore, consideration for Materials has been considered in relation to the enabling works and construction of the Proposed Development only.

¹ IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment.

² IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 19).

³ IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 27).

⁴ IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment (page 20).

⁵ The Environmental Permitting (England and Wales) Regulations 2016.

⁶ Defined by IEMA's guide to Materials and Waste in Environmental Impact Assessment (2020) as 'waste' materials that go through an acceptable recovery process, to lose their status as 'waste' and become materials for other uses.

Mitigation Measures

- 6 In view of the IEMA guide, mitigating measures will be implemented to reduce the quantity of materials used during the construction of the Proposed Development. The key construction materials will be:
 - Recovered from site (if relevant);
 - Recovered from off-site sources (e.g. donor sites) as far as reasonably practicable;
 - Sourced locally as far as reasonably practicable;
 - Sourced in accordance with The Green Guide to Specification⁷ to reduce the environmental impact of the construction of the Proposed Development by an informed and responsible selection of construction materials and components (for example, for the floors, roofs, walls, windows, insulation and landscaping of the Proposed Development) and selecting materials with a lower embodied carbon;
 - Reclaimed or recycled materials, where feasible;
 - Managed on the construction site through the implementation of appropriate materials handling and storage measures defined within a CEMP (or equivalent), which will include measures such as:
 - A 'just-in-time' material delivery system to avoid materials being stockpiled and spoiled during bad weather;
 - Consideration of material quantity requirement to avoid over-ordering and generation of waste materials; and
 - Designated storage area for new building materials, to reduce the risk of damage/spoiling.
- 7 The above measures will reduce the potential for significant adverse effects throughout the enabling works and construction of the Proposed Development in respect of materials. Significant adverse effects are therefore not considered to be likely.
- 8 Based on the above, it is proposed to scope out an assessment of the enabling works and construction effects on materials; however, the ES will set out:
 - The approximate type and quantities/volumes of materials that are anticipated to be required for the construction of the Proposed Development;
 - The sustainability credentials of materials (if known); and
 - The commitment to undertaking the measures outlined above.

Completed Development

- 9 The materials anticipated to be required during the operation of the Proposed Development are expected to be primarily used for maintenance purposes. Given that the quantities of materials to be used would be far less than that used during the construction of the Proposed Development and the scale and massing of the development (and so the expected maintenance required) would be typical for a residential-led development (please refer to the main EIA Scoping Report for a description of the Proposed Development), it is considered that significant adverse effects on materials due to the ongoing operation/use of the Proposed Development would be unlikely.
- 10 Based on the above, it is proposed to **'Scope Out'** of the EIA an assessment of operational effects on materials.

Waste

Baseline Waste Context

- 11 Presently, the site has been largely cleared and hoarded and as such considered to be generating no waste due to the vacant nature of the site. Whilst the demolition works have been implemented under the extant consents, there is expected to be a level of clearance required due to the crushed material left on-site.
- 12 LBH is located within the North London Waste Authority (NLWA), which is a statutory waste disposal authority responsible for the disposing of waste collected within the boroughs which form part of the NLWA. Other

⁷ BRE, (2009); The Green Guide to Specification, Fourth Edition.



boroughs located within the NLWA area include the London Boroughs of Barnet, Camden, Enfield, Hackney, Islington, and Waltham Forest.

- 13 The NLWA has adopted a North London Joint Waste Strategy (NLJWS) (2025-2040)⁸. The strategy sets out the future waste and recycling plans and targets for the NLJWS and each of the six boroughs to 2040. The strategy was formally adopted in November 2025.
- 14 The NLWA have also established the North London Waste Plan (NLWP), which provides a planning framework for the management of all waste produced in the seven Boroughs for the next 20 years. The aim of the NLWP is “to achieve net self-sufficiency for local authority collected waste (LACW), commercial and industrial (C&I) and construction and demolition (C&D) waste streams ... provide sufficient land for the sustainable development of waste facilities ... to enable the North London Boroughs to meet their waste management needs ...”⁹. This aim takes into account the waste apportionment targets identified through the London Plan 2021.
- 15 The North London boroughs LACW and C&I waste apportionment targets from the 2021 London Plan are detailed in Table 1 below¹⁰. Table 2 identifies the waste arisings and waste projections for the North London boroughs.
- 16 For clarity, the North London Boroughs are not required to meet the individual LACW and C&I waste apportionment figures in the London Plan (2021) separately, as long as the total combined apportionment figure is addressed.

Table 1 North London LACW and CI Apportionment* Targets and Projections

Waste Capacity	Capacity/Apportionments (tonnes)	
	2021	2041
London Plan Apportionment (2021)	1,307,000	1,389,000

*apportionment = share of London's total waste to be managed by a borough. In this case, the apportionment shown is combined for the 6 boroughs who are governed by the North London Joint Waste Plan.

- 17 Table 2 presents the Waste Plan's waste capacity forecast and land requirements from the North London Waste Plan Data Study Addendum (2020), which demonstrates that the boroughs can meet their apportionment targets in the Plan period by identifying sufficient land suitable for new waste facilities.

Table 2 Amount of Waste Generated in the North London Boroughs and Identified Capacity Gaps (LACW and C&I)

Type of Waste	Waste Arisings, Projections and Capacity Gaps (Tonnes)			
	2020	2025	2030	2035
Local Authority Collected Waste (LACW and C&I)	1,774,481	1,818,942	1,865,987	1,915,508
Capacity gap (between projected waste and existing capacity)	-101,218	-78,013	-125,058	-174,579
Available Existing Capacity	1,673,263	1,740,929	1,740,929	1,740,929

- 18 While the waste projections identified do not align exactly with the years specified within the London Plan for the apportionment targets, it can be seen that the waste projections for the North London boroughs are consistently higher than the apportionment targets (even when comparing waste generated in 2035 against the 2041 apportionment targets). As such, when considering the 2021 London Plan apportionment targets against the available existing waste infrastructure capacity up to the year 2041, there is enough capacity to accommodate the volume of waste included within the apportionment target. However, there is not currently sufficient capacity available to manage the projected waste.
- 19 To meet the 'net self sufficiency' aim of the NLWP (whereby managing the waste generated within the NLWP area), additional waste management infrastructure is also required. The North London Waste Plan identifies that an additional 1.5ha of land will be required for LACW and C&I waste streams for recycling purposes to achieve

⁸ North London Waste Authority (2025), North London Joint Waste Strategy 2025-2040.

⁹ North London Waste Authority (2022), North London Waste Plan.

¹⁰ Greater London Authority (2021), The London Plan.



net self-sufficiency. The management of LACW wastes will be supported by the re-development of the Edmonton Facility, an existing energy-from-waste facility that being upgraded, with construction for the project well underway as of Spring 2026. The NLWP identifies sufficient land to manage the equivalent of all LACW and C&I waste arising in North London by 2026.

- 20 Table 3 identifies the capacity gap between the existing infrastructure and the projected waste arisings from demolition and construction works for the North London boroughs. Additional capacity is currently available within the North London boroughs to manage this waste stream until 2035, as shown on Table 3 below.

Table 3 Amount of Waste Generated in the North London Boroughs and Identified Capacity Gaps (C&D)

Construction and Demolition Waste	C&D Waste Projections (Tonnes)			
	2020	2025	2030	2036
Projections	457,796	476,746	496,480	517,032
Existing Capacity	633,436	633,436	633,436	633,436
Surplus Capacity	+175,640	+156,690	+139,956	+116,404

Enabling Works and Construction

- 21 During enabling works and construction, it is anticipated that any waste for recovery (with the waste not being recovered from the site and reused on site as part of the construction works) or waste for disposal generated from the site would be directed to active and permitted waste management sites within the LBH and Boroughs of London.
- 22 In accordance with IEMA's guide¹¹, landfill capacity is considered to be a sensitive receptor. The types of waste (whether this be waste for recovery or waste for disposal) which may be generated by the enabling works and construction of the Proposed Development includes:
- Concrete;
 - Brick;
 - Glass;
 - Slate;
 - Plastic and packaging;
 - Mixed metals;
 - Gypsum;
 - Mixed enabling works and construction waste;
 - Card and paper; and
 - Hazardous waste (e.g. oils, paints, adhesives etc.).

Mitigation Measures

- 23 A CEMP will be prepared and implemented throughout the construction works pursuant to a planning condition. The CEMP will be supported by a Waste and Servicing Strategy (WSS) which would also be implemented throughout the enabling works and construction pursuant to a planning condition. The CEMP and WSS would define specific measures relating to the handling, storage and management/disposal of waste generated throughout the enabling works and construction. The measures defined within the CEMP and/or SWMP will minimise waste arising from enabling works and construction.
- 24 In relation to minimising waste from construction materials, management measures shall include but are not limited to (as discussed above):
- A 'just-in-time' material delivery system to avoid materials being stockpiled and spoiled during bad weather;

¹¹ IEMA, (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment.



- Consideration of material quantity requirement to avoid over-ordering and generation of waste materials; and
 - Designated storage area for new building materials, to reduce the risk of damage/spoiling.
- 25** Further to the above, additional mitigation measures that will be implemented include, but are not limited to, the following:
- The Applicant is committed to re-using a specific amount of enabling works and construction waste (for recovery) on-site, and the approximate quantities of waste anticipated to be generated by the enabling works and construction of the Proposed Development will be provided;
 - Should hazardous or contaminated materials be identified, works in the area will temporarily stop, and the materials will be removed and disposed of in line with relevant legislation and guidance e.g. The Control of Asbestos at Work Regulation 2012 and Control of Substances Hazardous to Health Regulations (COSHH) 2002;
 - The setting of waste reduction targets and waste re-use/recycling targets prior to commencing works on-site and monitoring of such targets throughout the duration of the enabling works and construction works; and
 - The implementation of waste segregation measures, whereby segregating the key/main waste streams, waste for recovery can be identified prior to leaving the site.
- 26** A Circular Economy Statement will also be prepared and submitted in support of the planning application to demonstrate how the Proposed Development will incorporate circular economy measures into all aspect of the design and construction processes, and which will consider waste arisings.
- 27** Based on the research identifying that the boroughs will have sufficient capacity (when including land suitable for new waste facilities) to manage apportionment targets, and the enforcement of and adherence to mitigation measures that would be implemented pursuant to planning conditions, any additional waste generated from the enabling works and construction Proposed Development will be unlikely to cause strain on the borough's waste management facilities. Therefore, significant adverse effects on the local waste management infrastructure and landfill capacity, resulting from the waste expected to be generated during the enabling works and construction of the Proposed Development, are considered unlikely.
- 28** Based on the above, it is proposed to '**Scope Out**' an assessment of the Proposed Development's enabling works and construction effects on waste/landfill capacity; however, the **ES Volume 1, Chapter 5: Enabling Works and Construction** will set out:
- The approximate type and quantities/volumes of enabling works and construction waste that are expected to be generated by the development;
 - The percentage or volumetric target for re-use of enabling works and construction waste (for recovery) on-site (if known); and
 - An outline of the waste aspects of the CEMP and WSS.

Completed Development

- 29** During the operation of the Proposed Development, it is anticipated that any waste for recovery or waste for disposal generated from the site would be directed to active and permitted waste management sites within the LBH.
- 30** It is anticipated that there will be no operational uses that will lead to the generation of waste streams that will require specialist storage, handling and disposal. Whilst these are not expected, should any of these arise, these would be expected to be managed appropriately and in accordance with relevant guidance.
- 31** The key waste materials which may be generated by the operational Proposed Development include:
- Organic/compostable waste;
 - Dry mixed recyclables;
 - Paper and cardboard;
 - Packaging wastes;



- Waste electrical and electronic equipment (WEEE) wastes;
- Bulky waste; and
- Residual waste.

Mitigation

- 32** The design of the Proposed Development will ensure there is sufficient storage and equipment/provisions (in accordance with the LBH requirements) in place to manage and direct the operational waste, expected to be generated by the Proposed Development, to the relevant storage areas provided. The design of the Proposed Development will also ensure there is sufficient space for the collection of waste to be relocated to the relevant active and permitted waste management sites.
- 33** In addition to the above, a **Waste and Servicing Strategy (WSS)** will be prepared and implemented as part of the Proposed Development, which will include information on the type and quantities/volumes of waste streams anticipated to be generated by the operational Proposed Development, along with how each waste stream will be managed. The strategy will also provide details on how waste will be reduced, minimised and recycled, where possible, in line with the Waste Hierarchy and the LBH's requirements.
- 34** A **Circular Economy Statement (CES)** will also be prepared to demonstrate how the development will incorporate circular economy measures into all aspect of the design and operation of the Proposed Development, and which will consider operational waste arisings.
- 35** Based on the ability of the boroughs to meet apportionment targets (when including land suitable for new waste facilities), and the enforcement of and adherence to mitigation (waste management) measures that would be implemented pursuant to planning conditions, any additional waste generated from the operational Proposed Development will be unlikely to cause strain on the borough's waste management facilities. Therefore, significant adverse effects on the local waste management infrastructure and landfill capacity, resulting from the waste expected to be generated during the operation of the Proposed Development, are considered unlikely.
- 36** Based on the above, it is proposed to scope out an assessment of the Proposed Development's operational effects on waste/landfill capacity, however, the **ES Volume 1, Chapter 4: The Proposed Development** will set out:
- The approximate type and quantities/volumes of operational waste that are expected to be generated by the operational Proposed Development; and
 - An outline of the WSS (or equivalent).

Conclusion

- 37** Based on the details set out above, it is considered that significant effects relating to waste and materials are unlikely and as such these topics are '**Scoped Out**' of the EIA.

TOPIC SHEET

Water Resources, Flood Risk and Drainage

Introduction

- 1 The need for a water resources, flood risk and drainage ES chapter has been considered by Whitby Wood.
- 2 It is considered that no significant effects relating to water resources, flood risk and drainage are likely and as such this topic is **'Scoped Out'** of the Environmental Impact Assessment (EIA). Justification for this is provided within this topic sheet.
- 3 This review has been undertaken with reference to the following key policy and guidance documents:
 - National Planning Policy Framework (NPPF) (2025)¹ and Planning Practice Guidance (PPG) (initially issued March 2012)²;
 - The London Plan (2021)³;
 - LBH's Local Flood Risk Management Strategy (2025)⁴; and
 - Other relevant planning policy and guidance documents.
- 4 The review has been undertaken in accordance with best practice guidance on the assessment of development projects with regard to the water environment, including that provided by the Institute of Environmental Management and Assessment (IEMA)⁵.

Baseline Conditions

Fluvial Flood Risk

- 5 The nearest river to the site is the River Lea, located approximately 400m to the east at the nearest boundary.
- 6 The Environment Agency's Flood Risk Data shows the entire site is situated within Flood Zone 2 as shown in Figure 1 below. Land within this Flood Zone is defined as land with between 0.1% and 1% annual probability of river flooding and between 0.1% and 0.5% annual probability of sea flooding. Therefore, the risk of flooding from Fluvial sources can be categorised as 'Medium'. However, the risk of flooding from rivers and seas is 'Very Low' for both present and climate change scenarios. Figure 2 below demonstrates the site's risk of flooding from rivers and seas.
- 7 The flood risk from rivers and seas has been assessed across the climate change scenarios for depth ranges exceeding 200mm, 600mm and 1,200mm, as illustrated in Figure 3. All water ingress on the site is categorised 'Very Low' across all depth intervals within the western region of the site. Given that the risk is considered 'Very Low', and the threshold for compensation on this site would only be required for flooding events up to the 1:100yr + climate change, no flood compensation will be required.

¹ Department for Communities and Local Government. (2023). National Planning Policy Framework.

² Department for Communities and Local Government. (2012). Planning Practice Guidance. Flood Risk and Coastal Change. (Online). Available at: <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

³ Mayor of London. (2021) The London Plan. The Spatial Development Strategy for London. Consolidated with Alterations Since 2011.

⁴ London Borough of Haringey's Local Flood Risk Management Strategy (2025).

⁵ IEMA - IEMA Impact Assessment Guidance.

Figure 1 Flood Zone Map

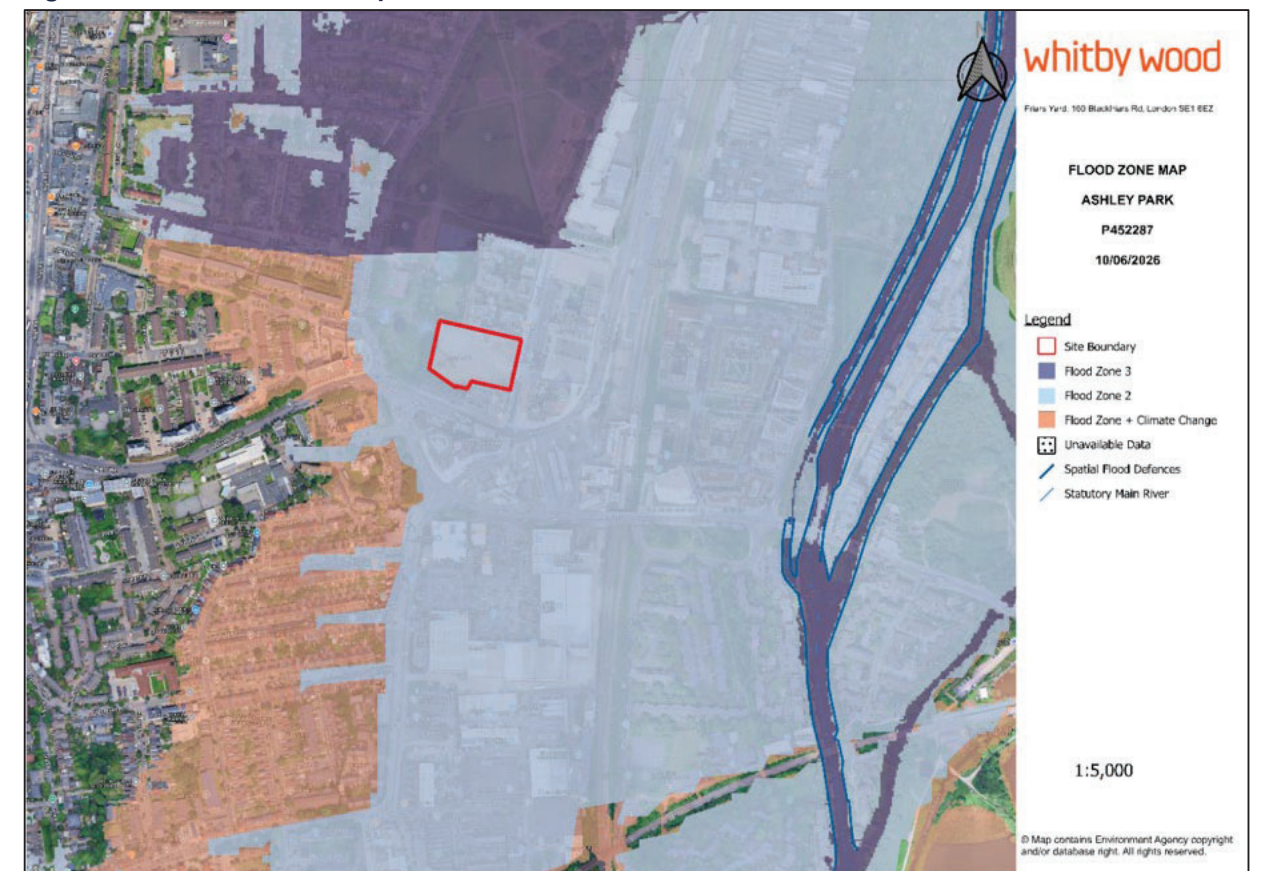


Figure 2 Risk of Flooding from Rivers and Seas Extent Map

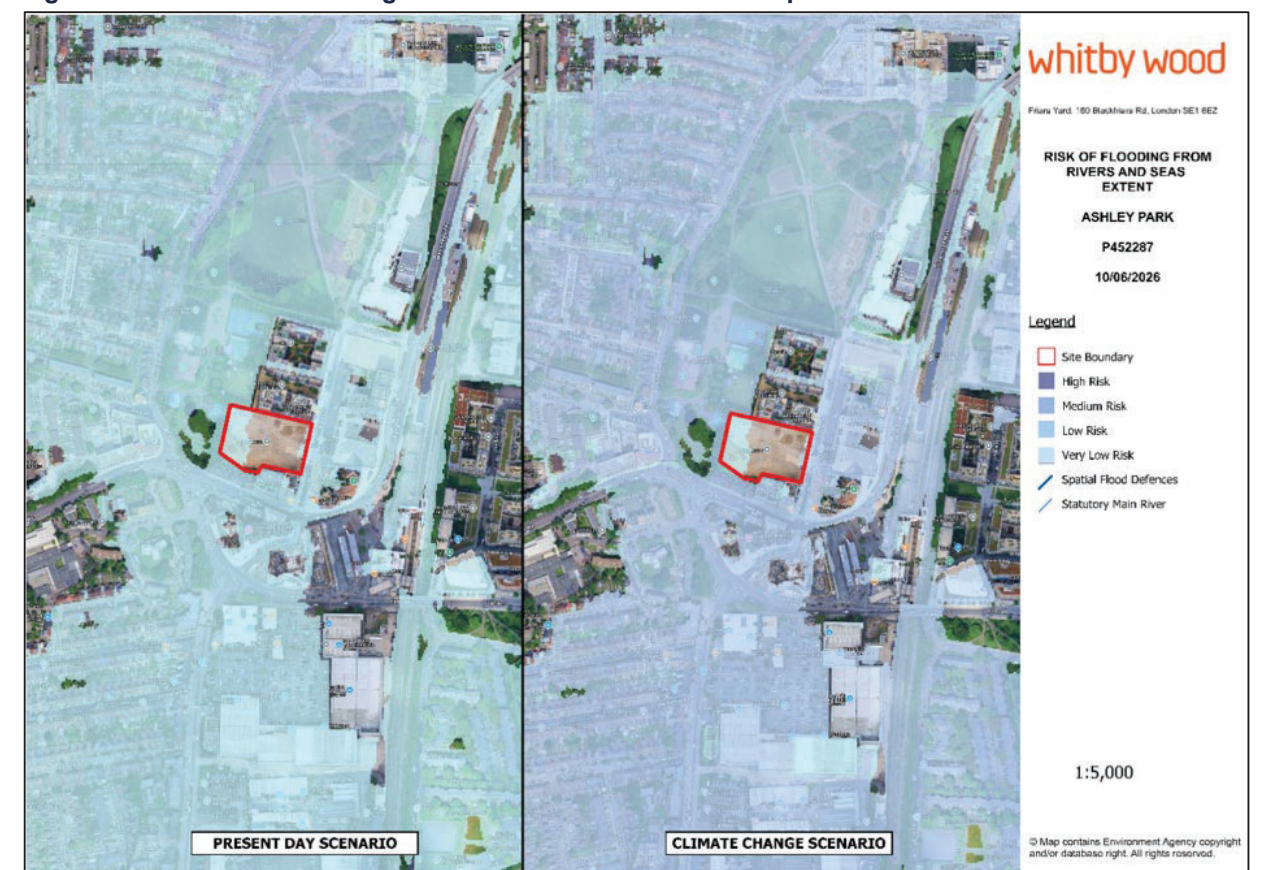




Figure 3 Risk of Flooding from Rivers and Seas Including Climate Change Depth Map



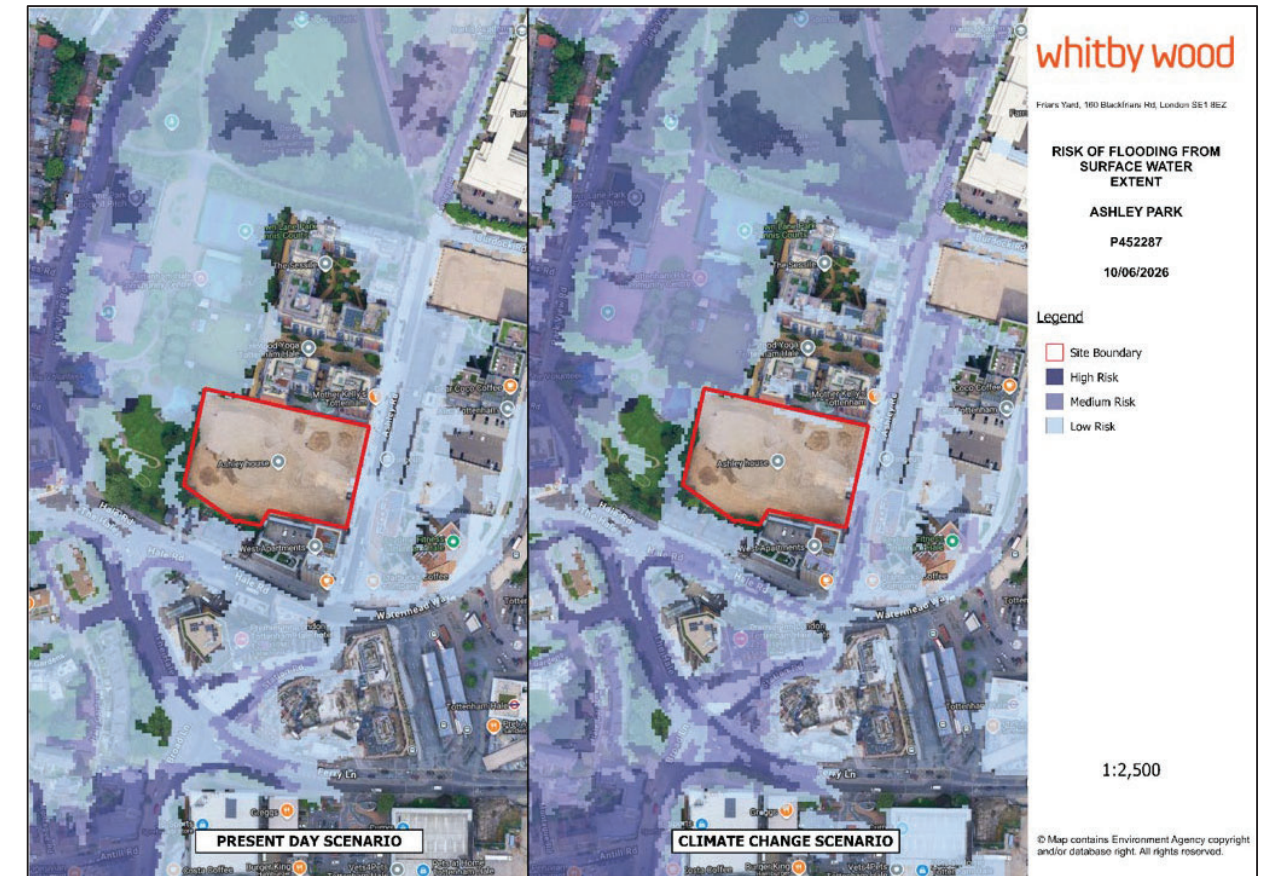
Surface Water Flooding

- 8 The risk of surface water flooding has been assessed by viewing the updated Flood Maps for Surface Water (uFMfSW), which have been replicated in Figure 4 below. This shows that much of the site has 'Very Low' risk of surface water flooding. There is a small segment in the site that is classified as 'Low' risk of surface water flooding for the climate change scenario. The definitions for each surface water flood risk category have been detailed below:

- **Very low** risk means that each year this area has a chance of flooding of less than 0.1%;
- **Low** risk means that each year this area has a chance of flooding of between 0.1% and 1%;
- **Medium** risk means that each year this area has a chance of flooding of between 1% and 3.3%; and
- **High** risk means that each year this area has a chance of flooding of greater than 3.3%.



Figure 4 Risk of Pluvial Flooding Extent Map



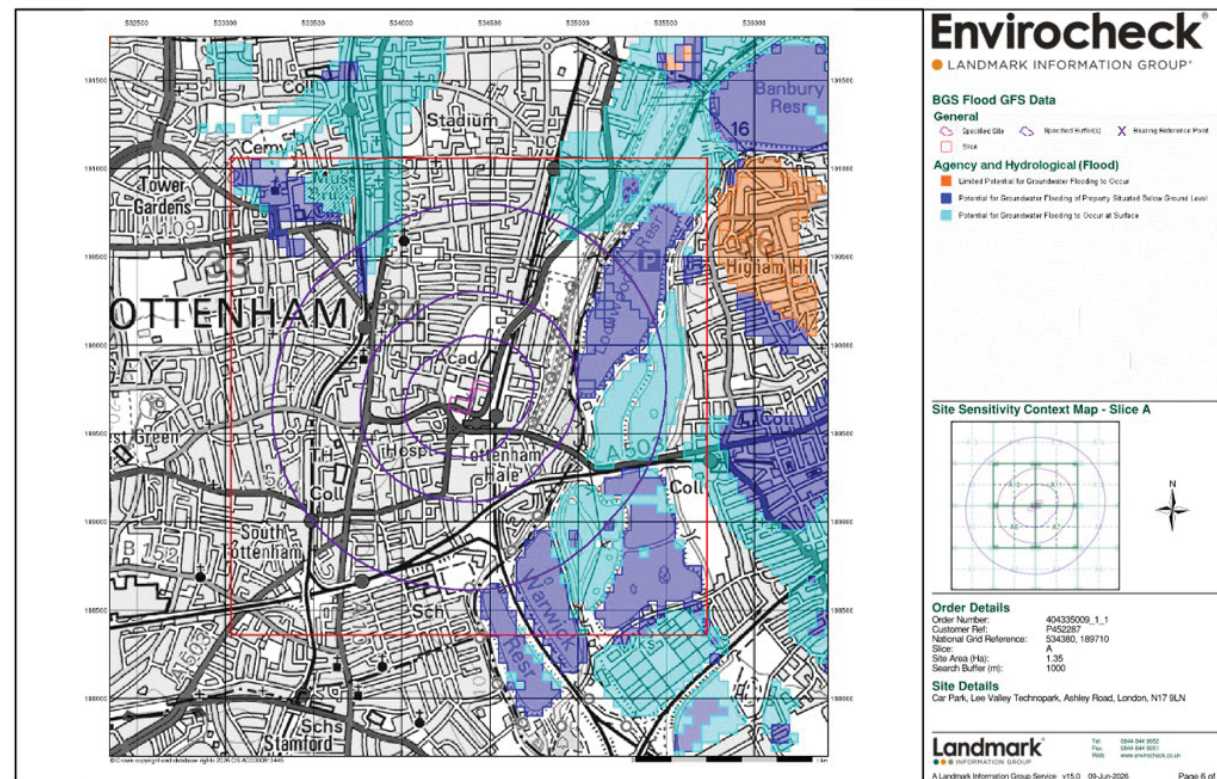
Groundwater Flooding

- 9 According to the British Geology Society, the ground conditions expected to be encountered include superficial deposits in the form of Enfield Silt Member – clay and silt, with bedrock geology of the London Clay Formation. The strategic flood risk assessment shown in Figure 5⁶ shows the site is located within a zone that is classified as having no potential for groundwater flooding to occur. The nearest observed potential for groundwater flooding is approximately 0.8km away. Therefore, the risk of groundwater flooding can be classed as low.

⁶ London Borough of Haringey, Strategic Flood Risk Assessment (2022).



Figure 5 Potential Groundwater Flooding Zones



Sewer Flooding

- 10 Extracted data from the London Borough of Haringey Strategic Flood Risk Assessment (SFRA) shows the site is located within a postcode section of N17 that has experienced 361 sewer floods between 2017 and 2021. The number of surface water flooding and water main burst incidents in the four-digit postcode area of N17 9 was one during 2017 to 2021.
- 11 It should be noted that the flood records provided may not be a complete and accurate record of flood events over this period, as some minor flooding incidents may go unreported, particularly if no property is affected by such flooding.
- 12 Based on this evidence, the risk of sewer flooding at the site is deemed to be 'Low'.

Artificial and Reservoir Flooding

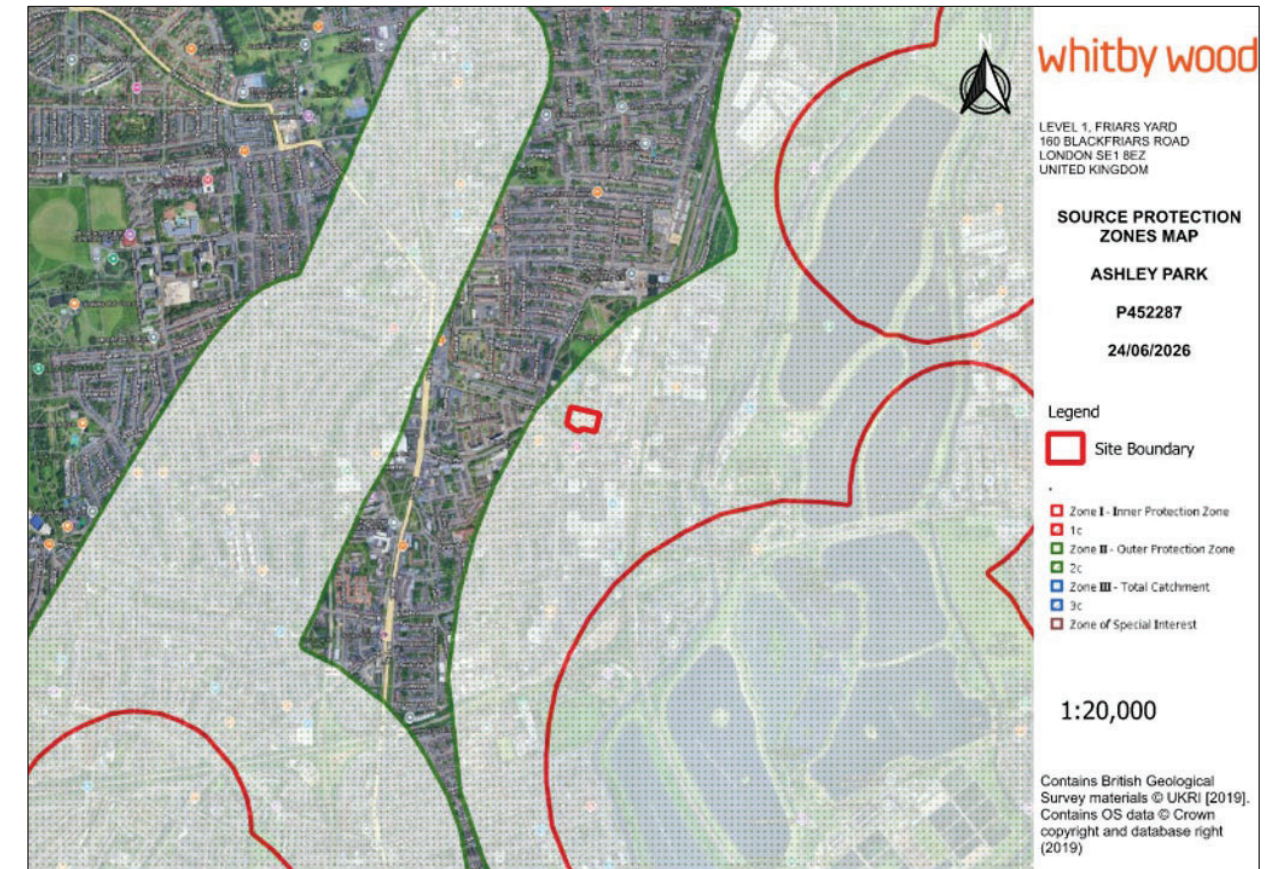
- 13 Reservoirs across England are regulated by the Reservoirs Act 1975 which set stringent conditions for the operation of reservoirs to ensure high levels of safety. They are designed to operate in a way which ensures the likelihood of failure is incredibly low and therefore the risk of the site flooding from a reservoir is low. For this reason, this source of flooding has not been considered further within this report.

Source Protection Zone

- 14 The Proposed Development is located in Source Protection Zone 2 (SPZ2) as shown by Figure 6 below. SPZ2 is defined by the Environment Agency as the zone within which 400 days of groundwater travel time to the abstraction point applies.



Figure 6 Source Protection Zone Map



Sewage and Water Supply Infrastructure

- 15 Foul water discharge rates are expected to increase as a consequence of the Proposed Development. Estimated wastewater volumes arising as a result of the Proposed Development will be presented in the DSR.
- 16 Consultation with Thames Water (TW) will be undertaken as part of the pre-application process to understand existing capacity constraints on the foul water public drainage network.
- 17 The Proposed Development will include water efficiency measures where feasible to minimise the volume of foul water discharged to the network and so reduce the overall magnitude of the impact of the Proposed Development on the foul drainage/ sewer network.
- 18 It is anticipated that any required upgrades to the foul water drainage network would be discussed with TW and ultimately undertaken by TW to increase the capacity of the sewer network and enable it to accommodate additional flows from development sites across London.
- 19 The Drainage Strategy Report (DSR) will identify any existing capacity issues within the foul water drainage network and present strategic options for foul water management at the site. The design principles will be set out by the DSR including assumptions on expected potable water demand and estimated wastewater volumes. As a result, no significant effects are expected.

Discussion for Scoping Out

Enabling Works and Construction

- 20 Each aspect is considered in turn below, setting out the works that could give rise to a risk, the effect that could arise, and the reasons why no significant effects are anticipated. It is anticipated that all water authority consents will be obtained pre-planning, with the exception of the S106 agreement to connect to the Thames Water (TW) network; both will be obtained pre-commencement.
- 21 **Surface water:** Site clearance, earthworks, excavation and the movement of construction plant and materials may expose areas of bare ground and introduce fuels, oils and chemicals to the site. Left uncontrolled, these



works could mobilise sediment and pollutants in surface water runoff and affect nearby watercourses, drainage features and habitats. The appointed contractor will formalise an environmental protection plan; the following steps demonstrate how the risk will be mitigated such that no significant effect is anticipated:

- Initially, it is important to identify the receptors at risk from potentially polluted runoff. Locating all nearby watercourse, drainage ditches and habitats on-site or within its vicinity will help develop the environmental protection plan by establishing buffer strips and storage locations that minimise risk of runoff from impacting the receptors;
- All personnel on-site will be trained to be aware of the potential impact of their activities and be equipped with knowledge of how to eliminate that impact;
- An Emergency Response Plan will be formulated during the enabling works and construction and plan accordingly through risk assessments for potential scenarios. The Emergency Response Plan will review the possible incidents and emergencies such as spillages, extreme weather events, temporary works etc, and how to react to them;
- During site clearance, unnecessary clearing of vegetation will be avoided to prevent sediment pollution from runoff. A phased approach should be carried out where the areas of the site are only cleared when works are required, rather than leaving large areas of exposed ground for long periods of time. Any invasive or noxious plants will be removed before enabling works and construction commence;
- Stockpiles will be sited away from watercourses and any fuel, oil or chemicals should be stored on an impermeable base. Where possible bunds will be placed around any stored items to prevent water ingress/ egress;
- Diversion ditches can be introduced to prevent runoff leaving the site. The diversion ditches should be lined with non-erodible material and convey polluted runoff to silt traps to remove the silt from runoff; and
- Should any contaminated water need to be discharged from the site during the enabling works and construction, then a temporary trade effluent agreement will be obtained.

22 Drainage: Construction works and the movement of heavy construction traffic could damage any existing drainage that is to be retained, or newly installed drainage, potentially reducing its capacity or causing localised flooding. Any existing drainage to be retained will be protected from construction works and traffic, with its location and level established through existing Ground Penetrating Radar (GPR) surveys. Where retained or newly installed drainage lies within designated construction traffic routes, timber bog mats will be laid over the drainage to distribute heavy loads around the infrastructure. The appointed contractor will implement a Construction Management Plan (or similar) setting out in further detail how the drainage will be protected and maintained throughout the enabling works and construction period. As such, no significant effect on drainage is anticipated.

23 Flood risk (on- and off-site): Temporary works, stockpiles, material storage, site compounds and open excavations could obstruct overland flow paths or temporarily reduce floodplain storage, which in principle could increase flood risk both on-site and elsewhere. The site lies within Flood Zone 2, but carries a 'Very Low' residual risk of flooding from rivers and the sea. The enabling works and construction will be phased and managed under the Construction Management Plan (or similar) so that existing flow routes are maintained and there is no net loss of floodplain storage. As such, no significant effects on flood risk, either on-site or off-site, are anticipated during the enabling works and construction.

24 Groundwater flooding: Excavation, foundation works and any temporary dewatering required to construct below-ground structures could intercept or locally alter groundwater flow. The site is classified as having no potential for groundwater flooding, with the nearest observed potential source located approximately 0.8km away, and any dewatering would be temporary, controlled and, where necessary, discharged under the appropriate consent. As such, no significant effect associated with groundwater flooding is anticipated.

25 Local sewage network: Temporary welfare facilities and any silt-laden or contaminated water requiring disposal during the enabling works and construction could place a short-term load on the local foul sewer network. Construction volumes will be limited and, should any contaminated water need to be discharged from the site, a temporary trade effluent agreement will be obtained from TW beforehand. Given these controls, no significant effect on the local sewage network is anticipated during the enabling works and construction.



26 Water supply: Construction activities such as dust suppression, wheel washing, welfare provision and concrete works will require a temporary water supply. This demand will be modest, temporary and served through a metered connection agreed with TW. As such, no significant effect on the local water supply is anticipated during the enabling works and construction of the Proposed Development.

Completed Development

27 Once the Proposed Development has been constructed and handover has commenced, it is vital that a designated maintenance and operations team is instructed to ensure the continuous upkeep of any proposed Sustainable Drainage (SuDS) features throughout the lifetime of the development.

28 Should any additional enabling works and construction take place after the completion of the first phase of the Proposed Development which may result in the relocation or excavation of any SuDS features, an appropriate consultant will be appointed to ensure that the proposed design is compliant with all applicable policies.

29 It is likely that there will be an increase in water demand in the operational phase, this however will be discussed with TW to ascertain whether capacity exists within the public water supply network. If required, additional capacity will be requested to supply the Proposed Development, or mitigation measures will be designed into the scheme to reduce water usage on-site. As such, effects related to water demand are not considered to be significant.

Cumulative Effects

30 Surface water: It is anticipated that the design of the Proposed Development will result in improved discharge rates compared to existing baselines (through attenuation storage, SuDS, and reduced impermeable area). Increased in-situ attenuation will also produce a decrease in runoff rates so significant cumulative effects are unlikely.

31 Flood risk: All sites (including the Proposed Development) must ensure no off-site impacts with regards to flood risk. As such it is anticipated that design of all schemes will ensure that there will be no significant effect on risk of flooding elsewhere.

32 Sewage network and water supply: Consultation with TW will inform any residual effects on the sewerage network, including capacity issues and associated flood risk both in-situ and downstream.

33 It is anticipated that any residual effect here will be designed out to ensure that the Proposed Development has no significant effects on foul drainage or water supply in combination with other projects.

Mitigation Measures

34 The London Plan states that development proposals should aim to achieve greenfield runoff rates and that drainage should be designed and implemented in ways that promote multiple benefits including water use efficiency, water quality and enhance biodiversity, urban greening, amenity and recreation. In addition, the Department for Environment, Food & Rural Affairs' (Defra) Non-Statutory Technical Standards require major developments to aim to achieve greenfield runoff rates for all new developments.

35 The site surface water drainage system will be designed to manage the 1 in 100-year plus 40% climate change scenario, incorporating SuDS in accordance with best practice. The strategy for the management of surface water will be detailed in the DSR, which is also being prepared to support the Planning Application. The proposed foul water drainage strategy should also be designed in such a manner as to minimise any potential risks of sewer flooding resulting from the Proposed Development.

36 Due to the site being located in a Source Protection Zone, surface water discharge from the site won't be viable via soakaway or infiltration as the main outfall.

Conclusion

37 As discussed in the above sections, with the inclusion of appropriate mitigation measures and considering the existing baseline conditions on the site and within the surrounding area, significant environmental effects with regards to water resources, flood risk and drainage are considered unlikely. This topic is therefore proposed to be '**Scoped Out**' of the EIA.



- 38 A Flood Risk Assessment (FRA) and Drainage Strategy Report (DSR) will be prepared and submitted in support of the planning application, as required by the RBG validation checklist. The scope of these documents is set out below.

Flood Risk Assessment and Drainage Strategy Report Scope

- 39 A site-specific FRA and DSR will be prepared to support the planning application for the Proposed Development. The FRA will assess the risk of flooding from fluvial, groundwater, surface water, sewer, tidal and other artificial sources, and the change in risk due to climate change. The FRA will be carried out in accordance with the National Planning Policy Framework (NPPF)⁷, specifically section 14 'Meeting the challenge of climate change, flooding and coastal change' and consider the requirements of the Environment Agency (EA) and the Lead Local Flood Authority (LLFA), the London Borough of Haringey (LBH).
- 40 The FRA will incorporate the following:
- Analysis of flood risk from all sources – including natural sources such as rivers and streams and engineered or artificial sources such as reservoirs, sewers and canals;
 - Assessment and inclusion of appropriate allowances for climate change for the design life of the Proposed Development;
 - Review of relevant background information for the site, including the LBH's Strategic Flood Risk Assessment⁸ and Local Flood Risk Management Strategy and 5-year Delivery Plan⁹;
 - Correspondence with the EA and LLFA;
 - Description of flood risk mitigation measures required for a safe development;
 - Identification of safe access and egress routes if required;
 - Incorporation of the DSR for the site; and
 - Confirmation that soakaways and infiltration will be omitted as the primary method of surface water discharge from the Proposed Development, owing to the site's location within a Source Protection Zone.

Annex C: Cumulative Schemes

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 of effects with other existing and/or approved projects*” (Schedule 4, 5(e)). Table 1 presents the list of cumulative schemes that have been considered within the cumulative effects assessment of the technical chapters.

Generally, the criteria for the cumulative schemes included within the cumulative effects assessment typically include the following:

- Development within 1km of the site that is subject to a planning application (and is either yet to be determined, have full planning consent or a resolution to grant), comprising either:
 - An uplift of more than 10,000 m² (Gross External Area (GEA) of mixed-use floorspace), or over 150 residential units; Or
 - Any 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.

The criteria listed above have been set to allow all the schemes coming forward within the London Borough of Haringey to be subject to an initial screening exercise to determine the schemes that, based on the scale of redevelopment (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 EIA.

A map has been provided as Figure 7, which shows the approximate location of the cumulative schemes list in Table 7.

Table 7 Cumulative Schemes List

No.	Address	Description	Reference	Status
Schemes that are Approved and which form part of the Cumulative Assessment				
1	Berol Quarter, Ashley Road, London, N17 9LJ, London	Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works.	HGY/2023/0261	Approved 03/03/2025. Under Construction
		Application made under Section 73 of the Town and Country Planning Act 1990 to vary Condition 2 (Approved Plans and Documents) attached to planning permission HGY/2023/0261 granted 03/03/2025. Permission is sought to alter the approved drawings to show inward opening doors at the roof level of 2 Berol Yard instead of the permitted glass panels. Permission is also sought to alter the permitted level of affordable housing.	HGY/2025/0930	Under Consideration Approved 30/06/2026

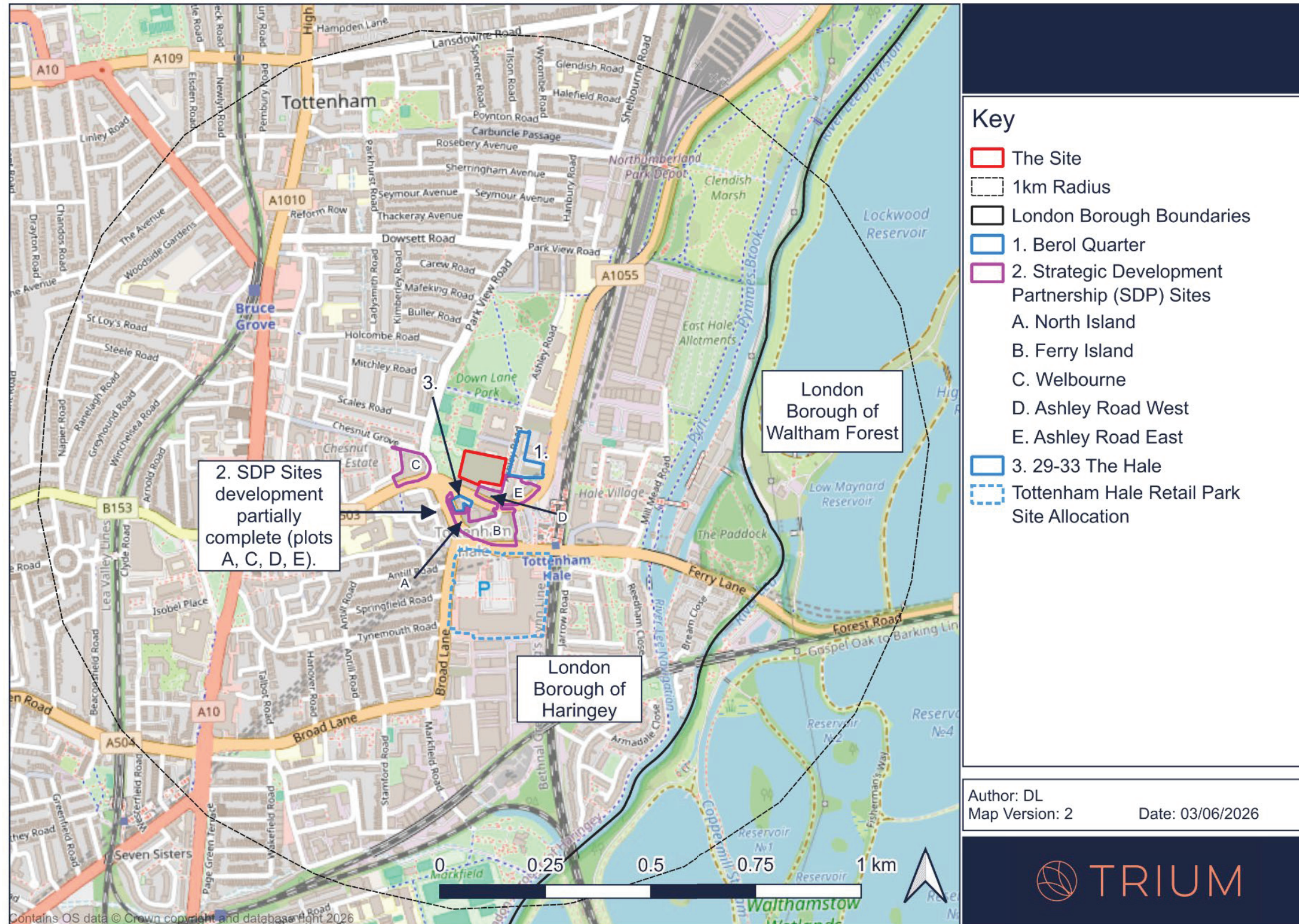
⁷ Ministry of Housing Communities & Local Government, National Planning Policy Framework (NPPF) (2025).

⁸ London Borough of Haringey, Strategic Flood Risk Assessment (2022).

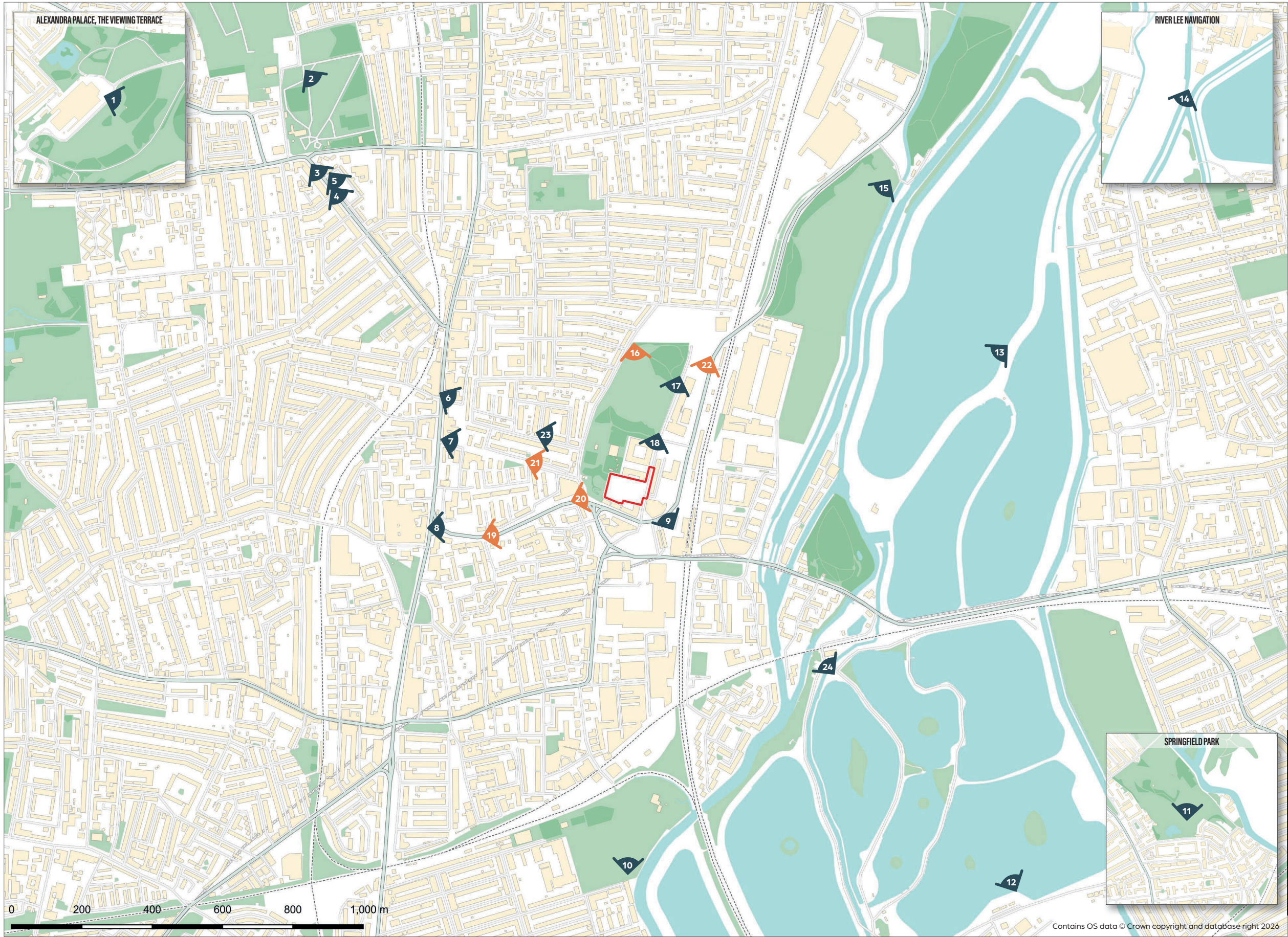
⁹ London Borough of Haringey, Local Flood Risk Management Strategy and 5-year Delivery Plan, 2025-2030 (2025).

2	Strategic Development Partnership (SDP) Sites, Welbourne, North Island, Ferry Island, Ashley Road East and Ashley Road West, Station Road, London, N17, London	Demolition works and clearance of existing site to provide a mixed-use development comprising 6 buildings up to 38 storeys in height, which together with pavilion and basement accommodation will provide up to 104,053m² of floorspace (GIA), comprising residential (Use Class C3) (up to 1,036 units), retail (Use Class A1-A4), health centre (Use Class D1), office (Use Class B1), leisure (Use Class D2) parking and servicing areas, hard and soft landscaping (including the provision of a new public square), highways works, creation of new vehicular accesses and the realignment of Station Road, decentralised energy network works and other associated works. ***** ***** The site is split into six plots: • A – North Island (Complete and operational 2023) • B – Ferry Island (Under Construction – topping out Aug 2025 with completion estimated for summer 2026, and occupation in autumn/winter 2026) • C – Welbourne (Complete and operational 2024) • D – Ashley Road West (Complete and operational 2022) – Directly adjacent to the site to the south. • E – Ashley Road East (Complete and operational 2023) – Adjacent to the site to the east. • F – The Pavillion (not constructed and not expected to come forward at this time) <i>Only those remaining block under construction / not yet come forward will be considered within the cumulative effects assessment, all other plots completed and operational will be considered as part of the existing baseline conditions.</i>	HGY/2018/2 223	Approved 27/03/2019 Under Construction (Complete except Plot B and Plot F)
3	29-33, The Hale, London, N17 9JZ	Redevelopment of site including demolition of existing buildings to provide a part 7, part 24 storey building of purpose-built student accommodation [PBSA] (Sui Generis); with part commercial uses [retail] (Use Class E(a)) at ground and first floor; and associated access, landscaping works, cycle parking, and wind mitigation measures.	HGY/2021/2 304	Approved 30/08/2023 Under Construction (Completion Scheduled for Summer 2027)
n/a	Tottenham Hale Retail Park (London Borough of Haringey)	Site allocation within Haringey's Draft Local Plan. The site is 4.9ha in size with an allocation for 1500+ homes, 18,500m² of Town Centre uses (Class E, F and Sui Generis), and 2800m² other. Possibility of high rise buildings. Allocation is approximately 150m south of the site, adjacent to the SDP Sites Plot B (Ferry Island). Qualitative consideration and assessment will be provided only.	TH SA01	n/a

Figure 7 Cumulative Schemes Map



Annex D: Townscape Character Area Plan, Visual Location Plan



VIEW LOCATION PLAN

- Application Site
 - Wireline (AVR1)
 - Render (AVR3)
- Alexandra Palace, the viewing terrace
 - Bruce Castle Park
 - Bruce Grove (1)
 - Bruce Grove (2)
 - Edmansons Close Courtyard
 - High Road and Stoneleigh Road Junction
 - High Road and Chesnut Road Junction
 - High Road and Monument Way Junction
 - Tottenham Hale Station
 - Markfield Park
 - Springfield Park
 - Walthamstow Wetlands (south east)
 - Walthamstow Wetlands (north)
 - River Lee Navigation
 - Tottenham Marshes
 - Down Lane Park
 - Ashley Road (1)
 - Ashley Road (2)
 - Monument Way (1)
 - Monument Way (2)
 - Junction of Hamilton Close and Chesnut Road
 - Watermead Way
 - Scales Road
 - Engine House

LOCATION:
Ashley House, Ashley Road, Tottenham

DATE:
July 2026

SCALE:
1:11,000 @ A3

FIGURE:

▲ NORTH



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