Appendix: EIA Methodology
Annex 1: EIA Scoping Opinion Request Report
Annex 2: Cumulative Schemes List and Map

Appendix: EIA Methodology

Annex 1: EIA Scoping Opinion Request Report

Annex 2: Cumulative Schemes List and Map

Ashley House

EIA Scoping Opinion Request Report

Prepared for:
RE:SHAPE T LTD

Date:
July 2026

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ASHLEY HOUSE

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TRIUM

INTRODUCTION

1 RE:SHAPE T LTD (hereinafter referred to as the 'Applicant') is seeking a full (detailed) planning permission for the redevelopment of an area of land (approximately 0.90 hectares ('ha')) located within the administrative boundary of the London Borough of Haringey ('LBH') ('the site'). The site is located within Tottenham Hale and is bounded by Rosa Luxemburg (residential building) to the north, Ashley Road to the east, low-rise terraced residential properties and 2 Ashley Road (West Apartments) along Hale Road to the south, and Down Lane Park (publicly accessible open space) to the west. The site location and the indicative planning boundary are shown in Figure 1 and Figure 2 respectively.

2 The scheme proposals (herein referred to as the 'Proposed Development') are likely to comprise of two new buildings ranging between 6-24 storeys, with a maximum height of 90m AOD, to accommodate Use Classes C3, E/F2 and Sui Generis, providing approximately 540 shared-living units[1] and 87 residential units with provision of non-residential floorspaces on the ground floors to each building. The Proposed Development will be set around an extensive public realm, communal open spaces, landscaping, with associated blue-badge residents parking and ancillary infrastructure. A full description of the Proposed Development is provided in the '*The Proposed Development*' section of this Scoping Report.

3 Given the size and nature of the scheme, the Proposed Development falls within the classification of Schedule 2, 10(b) (Infrastructure Projects – Urban Development Projects of the Environmental Impact Assessment (EIA) Regulations[2]. Taking into account the scale of the redevelopment (provision of over 150 dwellings which exceeds the screening thresholds as set out in the EIA Regulations) and the nature of the site and surrounding area, there is the potential for significant environmental effects to arise to a limited number of environmental aspects. The Proposed Development is therefore considered to constitute 'EIA development' under the EIA Regulations, and so an Environmental Statement ('ES') will be prepared and submitted to accompany the planning application. No request for an EIA Screening Opinion has therefore been submitted to the LBH, as an EIA is being undertaken.

4 Trium Environmental Consulting LLP ('Trium') has been appointed by the Applicant to undertake the EIA scoping exercise. This EIA Scoping Opinion Request Report ('Scoping Report') is submitted to the LBH to seek an EIA Scoping Opinion in accordance with Regulation 15 of the EIA Regulations. This process is carried out to agree the approach and scope of the EIA and will be reported in the ES, which is to be submitted to accompany the future detailed planning application.

5 The EIA Regulations require that in order to ensure the completeness and quality of the ES, *"(a) the developer must ensure that the environmental statement is prepared by competent experts;' and '(b) the environmental statement must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts*." Trium consider that these requirements are equally important and relevant to the EIA scoping process in addition to the preparation of the ES. As such, in accordance with this requirement, the following statement is provided:

"*Trium is an environmental consultancy specialising in urban regeneration and property development projects in the United Kingdom (UK), with a specific focus in London. Trium's Partners and Employees have extensive experience in managing the environmental issues and impacts surrounding large scale, high profile urban regeneration development projects. The Partners and Employees of Trium have, over the course of their careers to date (including with former employers), project directed, managed or contributed to over 700 EIAs within the industrial, commercial, residential, retail, leisure, cultural, and infrastructure sectors. They have particular expertise in London based development project*."

6 The need for an EIA and the approach taken for scoping is discussed further with '*EIA and the Scoping Process*'.

[1] *1.8 shared-living units would be equivalent to one traditional dwelling unit as per the GLA, 2024. Large-scale Purpose-built Shared Living LPG; GLA, 2021. The London Plan 2021.*
[2] *The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).*

Figure 1 Site Location Plan[3]

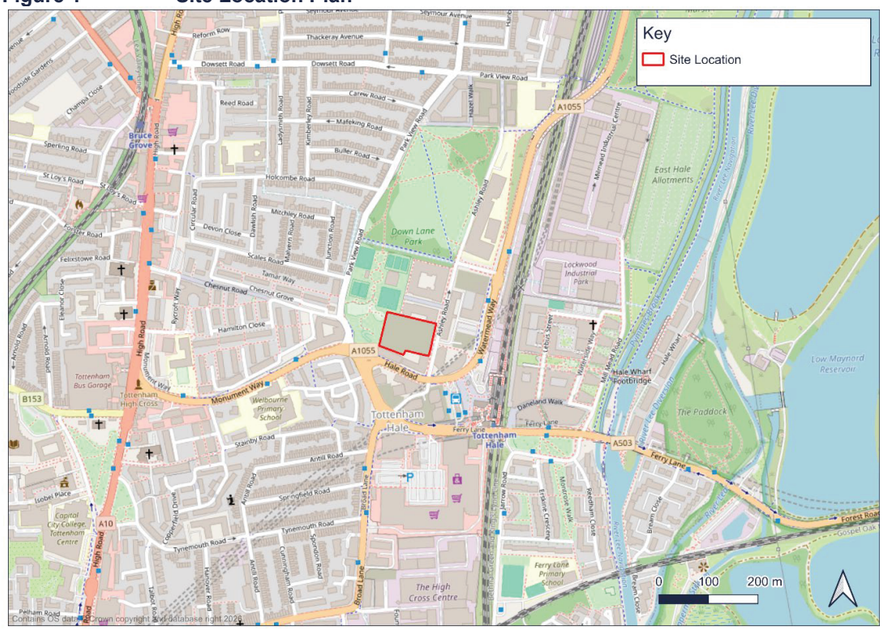
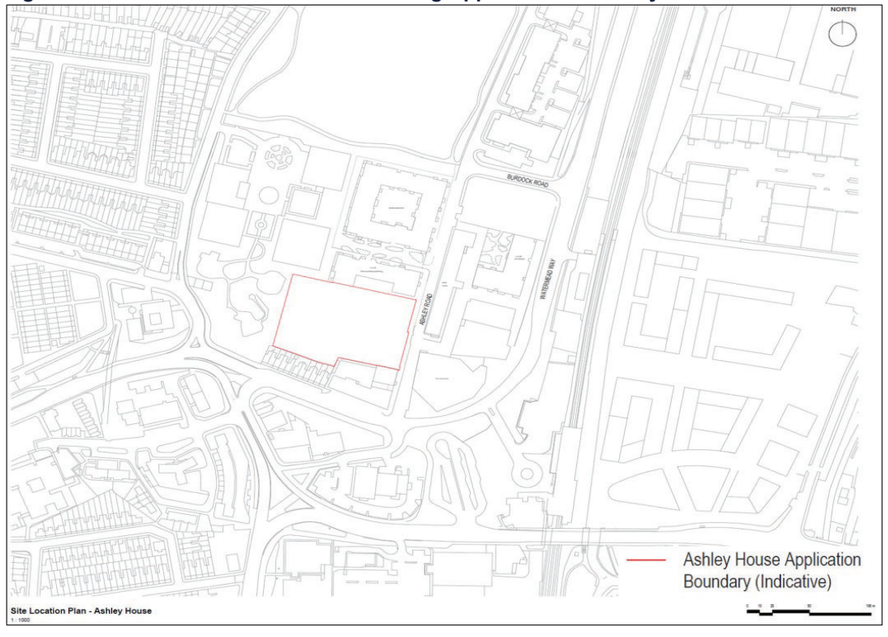


Figure 2 Indicative Redline Planning Application Boundary



[3] *The redline boundary is indicative at this stage, and may slightly differ across the figures presented within EIA Scoping Report and Annex A – F. This graphical difference does not affect the proposed scope of the EIA, nor the boundary that this scope pertains to.*

Purpose of The Report

7 This Scoping Report has been prepared to ensure that the subsequent EIA focuses on the impacts which are likely to give rise to significant effects and to agree with the LBH and statutory consultees the EIA approach and scope.

8 The Scoping Report also identifies the technical topics / aspects not considered likely to result in impacts which would result in a significant effect, and thus where no further assessment is required as part of the EIA. Notwithstanding this, various technical reports will accompany the planning application which consider these technical topics further, as relevant.

9 In accordance with paragraph 15. (1), Table 1 sets out the information the EIA Regulations requires a Scoping Report to include and where this can be located within this Scoping Report.

Table 1 Information Required to Accompany a Request for a Scoping Opinion

Information Required	Location within this Report
a plan sufficient to identify the land;	See Figure 1 and Figure 2
a brief description of the nature and purpose of the development, including its location and technical capacity;	See **The Proposed Development** (paragraph 38)
an explanation of the likely significant effects of the development on the environment; and	See **ENVIRONMENTAL TOPICS**, **Annex A** and **Annex B**.
such other information or representations as the person making the request may wish to provide or make	See **Structure of The Scoping Report** (paragraphs 10-11)

Structure Of This Scoping Report

10 This Scoping Report is structured as follows and provides:

- A summary of the EIA purpose and process including EIA Scoping;
- A description of the location of the site and the surrounding area's environmental context;
- Site planning history, for context;
- A description of the Proposed Development;
- Environmental Scope, including:
  - EIA Methodology;
  - A summary of the environmental topics that are considered to potentially result in significant effects on the environment (i.e. 'scoped in' to the EIA) and those that are considered unlikely to result in significant effects on the environment (i.e. 'scoped out' of the EIA);
  - In a supporting annex, a summary of the proposed scope and assessment and methodology that will be adopted to predict the magnitude of potential impacts and the resultant scale, nature, geographic extent and duration of potential effects, and the effect significance for the topics that are considered to potentially result in significant effects on the environment (and therefore 'scoped in' to the EIA); and
  - In a supporting annex, evidence/ justification for the topics that are considered unlikely to result in significant effects on the environment (and are therefore 'scoped out' of the EIA);
  - The proposed structure of the ES; and
- A request for an EIA Scoping Opinion.

11 This Scoping Report is supported by the following annexes:

- **Annex A**: 'Scoped In' Topic Sheets – Topic sheets for the topics that are considered to potentially result in significant effects on the environment;

- **Annex B**: 'Scoped Out' Topic Sheets – Topic sheets for the topics that are considered unlikely to result in significant effects on the environment with supporting evidence/ justification;
- **Annex C**: Cumulative Schemes;
- **Annex D**: View Location Plan and Townscape Character Area Plan;
- **Annex E**: Heritage Asset Plan; and
- **Annex F**: Phase 1 Geotechnical and Geoenvironmental Desk Study.

EIA AND THE SCOPING PROCESS

EIA Purpose and Process

12 EIA is a process carried out which examines available environmental information to ensure that the likely significant environmental effects of certain projects are identified and assessed before a decision is taken on whether a project is granted planning permission. This means environmental issues can be identified at an early stage and projects can then be designed to avoid or to minimise significant environmental effects, and appropriate mitigation and monitoring can be put in place.

13 Regulation 4 of the EIA Regulations sets out the EIA process. Specifically, Regulation 4(2) states that '*the EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the Proposed Development on the following factors:*

- (a) population and human health;
- (b) biodiversity;
- (c) land, soil, water, air and climate;
- (d) material assets, cultural heritage and the landscape; and
- (e) the interaction between the factors referred to in sub-paragraphs (a) to (d).'

14 The *potential* for likely significant effects on the aforementioned factors, during both the enabling and construction works associated with the Proposed Development and once the Proposed Development is complete and operational, is considered within the following relevant environmental topic sheets addressed within this Scoping Report:

- Air Quality;
- Archaeology (Buried Heritage);
- Townscape and Visual Impact;
- Built Heritage;
- Climate Change and Greenhouse Gases;
- Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution;
- Ecology and Biodiversity;
- Ground Conditions and Contamination;
- Human Health;
- Waste and Materials;
- Noise and Vibration;
- Project Vulnerability;
- Socio Economics;
- Traffic and Movement;
- Water Resources, Flood Risk and Drainage; and
- Wind Microclimate.

15 The method behind the EIA process generally[4] takes into account the existing conditions of the area into which the development is being introduced (the baseline) and makes reasonable predictions of the

[4] *There may be exceptions to the general approach described, such as within transport where an alternative baseline of a occupied building may be more appropriate. Where there are exceptions, this will be clearly described within the relevant*

likely change (the impact – in terms of magnitude) that may occur, during its enabling works construction and when the development is completed and operating as proposed. The predicted impact is considered in terms of key environmental and social aspects (receptor/ resource) found within the surrounding area, and based on their sensitivity to change, the resulting change experienced by the receptor/ resource (the effect) is then determined. Any mitigation measures required in order to reduce or eliminate adverse effects are then considered and assessed, with the resulting residual effect being determined as significant or not. The likely significant effects are then reported (within an ES) for consideration by the relevant planning authority, when considering whether to grant planning permission for a development.

The Scoping Process

16 EIA Scoping forms one of the early stages of the EIA process. Requesting an EIA Scoping Opinion from a local planning authority, in accordance with Regulation 15 of the EIA Regulations, involves the preparation of an EIA Scoping Report and its submission to the local planning authority is part of a request for their opinion on the content or 'scope' and approach to the EIA.

17 The purpose of scoping is to identify:

- the important environmental issues and topics for consideration in the EIA;
- the baseline conditions and assessment methodology to be used for assessment;
- any potentially sensitive receptors that may be affected by the development being proposed;
- the appropriate space boundaries of the EIA;
- the site boundary and surrounding environmental context;
- the committed developments that need to be considered in the assessment of cumulative effects;
- the information necessary for decision-making; and
- the potential significant effects which are likely to result from the development during its enabling works, construction and operation.

18 In accordance with the requirements of the Town and Country Planning (Development Management Procedure) Order 2015 (article 18, Schedule 4), this Scoping Report will need to be issued by the LBH to the statutory consultees that are considered to have an interest in the EIA of the Proposed Development and should be consulted as part of the EIA Scoping process. It is expected that the LBH will also issue the Scoping Report to non-statutory and key, local stakeholders and interest groups who are deemed to similarly have an interest in the EIA of the Proposed Development.

19 The process of consultation is a key requirement of the EIA process, and the views of statutory consultees and other stakeholders help to identify specific issues, as well as identifying additional information in their possession, or of which they have knowledge, which may be of assistance in progressing the EIA.

20 The ES will append the Scoping Report (this document) and the EIA Scoping Opinion and include a summary of any other consultation undertaken as part of the EIA process.

methodology section of each ES chapter, outlining both the departure from the general EIA methodology and the description of the alternative approach. This is discussed further within 'EIA Process and Methodology' section of this Scoping Report.

SITE DESCRIPTION AND ENVIRONMENTAL CONTEXT

Site Description

21 The site covers a total area of approximately 0.90ha of cleared hardstanding and is located at grid reference TQ 34341 89679. The site has been largely cleared following the implementation of extant planning application(s) by a different Applicant (planning application references: HGY/2016/4165[5], HGY/2018/2353, HGY/2019/0108[6] and APP/Y5420/W/19/3232707), of which environmental effects relating to the demolition of the previously buildings on-site would have been considered. There is a level of crushed material left on-site which will be removed or re-purposed towards the piling mat for the Proposed Development.

22 The Applicant has since purchased the site and is looking to bring forward a new planning application for the site relating to the proposals set out within 'The Proposed Development'.

23 The site is broadly rectangular in shape and currently cleared hardstanding. The site was a former industrial site and all buildings associated with this have subsequently demolished under the extant consent(s). This area of the site now comprises hardstanding and scrub vegetation.

24 The site itself falls within the Tottenham Hale Tier II Archaeological Potential Area. There are a number of Grade II listed and locally listed buildings that within the Tottenham Green and Bruce Grove Conservation Area, of which the site falls outside of. The nearest listed building is the Grade II listed 62B Monument Way, located approximately 350m to the west of the site.

25 The existing site is hoarded, however, vehicular access into part of the site is currently provided using Ashley Road.

26 To the north, the following residential properties are located: Rosa Luxemburg and Sessile with non-residential floorspace including the Mother Kelly's Tottenham Public House on the ground floor. To the east lies Ashley Road Berol House (commercial and industrial properties) with cleared hardstanding and car parking facilities behind. Watermead Way (A1055) is located beyond. Towards the southeastern boundary of the site lies the 1 Ashley Road (East Apartments) which fronts the A1055. Watermead Way (A1055) is located beyond. The A503 Hale Road is parallel to the site on its southern boundary beyond the low-rise terraced houses and 2 Ashley Road (known as 'West Apartments') (residential blocks). Down Lane Park (open space) is located adjacent on the site's western boundary.

27 The River Lee and Pymmes Brook lies approximately 370m east of the site.

28 In terms of travel modes, Tottenham Hale station (servicing the Victoria line and Stanstead Express overground line) is located approximately 135m southeast of the site. Bruce Grove Station (serving the Weaver overground line towards London Liverpool Street) is located approximately 670m northwest.

29 The surrounding area has recently undergone a transformation from previous industrial sites to mixed-use residential developments. The surrounding existing building heights range predominantly between 6 to 37 storeys.

30 Figure 3 provide a series of site photographs of existing site and immediate surrounds conditions.

[5] Planning permission reference. HGY/2016/4165, was granted 2 May 2018, with subsequent Reserved Matters approved under planning permission reference. HGY/2018/2353 granted on 14 November 2018, were implemented by way of demolition works involving the demolition of brickwork, demolition of corrugated walls, dismantling of roller shutters and removal of windows at one of the two previous existing buildings on-site. A certificate of lawfulness (ref. HGY/2023/1622) was secured on 21 August 2023, to confirm the works comprised commencement of material operations and took place lawfully.

[6] Planning permission reference. HGY/2019/0108, was allowed at appeal (planning permission reference. APP/Y5420/W/19/3232707) on 16 April 2020 and was implemented by way of demolition works involving the demolition of brickwork, demolition of areas of the façade and removal of windows at one of the two previous existing building on-site. A certificate of lawfulness (ref. HGY/2023/1621) was secured on 21 August 2023, to confirm the works comprised commencement of material operations and took place lawfully.

Figure 3 Site Conditions and Site Surrounds

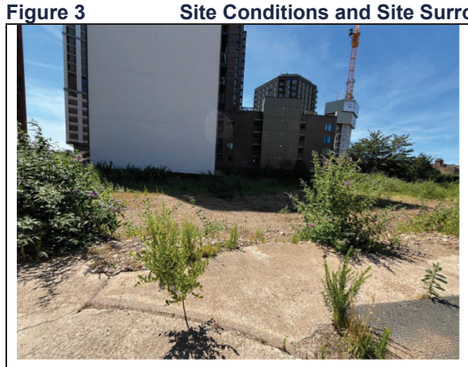


Photo 1: View looking towards Hale Road, 2 Ashley Road (West Apartments) and Hale Road terraced dwellings

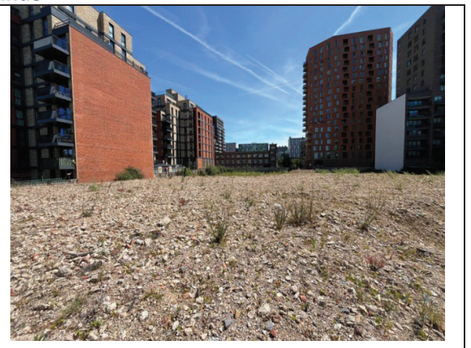


Photo 2: View looking towards Ashley Road with Rosa Luxemburg building, Berol House and 1 Ashley Road (East Apartments) in the foreground.



Photo 3: View looking towards 29-33 Hale Road development and Down Lane Park.



Photo 4: Closer perspective towards Down Lane Park and Trees Located Along the Site's Western Boundary.

Environmental Context

31 The site and surround's environmental context are described in Table 2 and illustrated in Figure 4.

Table 2 Environmental Context

Environmental Topic	Key Features and Designations
Air Quality	• The site is located within the Haringey Air Quality Management Area (AQMA) which covers the entirety of the borough. This was declared in 2001 for the exceedance of Nitrogen Dioxide (NO_2) annual mean and Particulate Matter (PM_{10}) 24 hour mean. • The site is also situated within the Tottenham Hale Gyratory and A10 High Road to Bruce Grove Air Quality Focus Area (AQFA). One other AQFA is located within 1km of the site; the Seven Sisters Junction Seven Sisters Rd/High Road A10 AQFA (approximately 681m southwest of the site).
Archaeology	• The site is located within the Tier II Tottenham Hale Archaeological Priority Area (APA). As such, the APA has potential to contain remains dated to the prehistoric, Saxon, Medieval and Post-Medieval periods[7]. • Additionally, the site is directly adjacent to the Lea Valley Tier III APA, within which is a high potential for organic remains to be contained, as well as paleoenvironmental evidence for past wetland and riverine environments. • Within 1km of the site is the Tottenham Medieval Settlement Tier II APA (approximately 352m west of the site), the Tottenham Mills Tier II APA (approximately 360m east of the site), and the Ermine Street Tier II APA (approximately 382m west of the site).

[7] Historic England (2021), Haringey APA Review Final Report

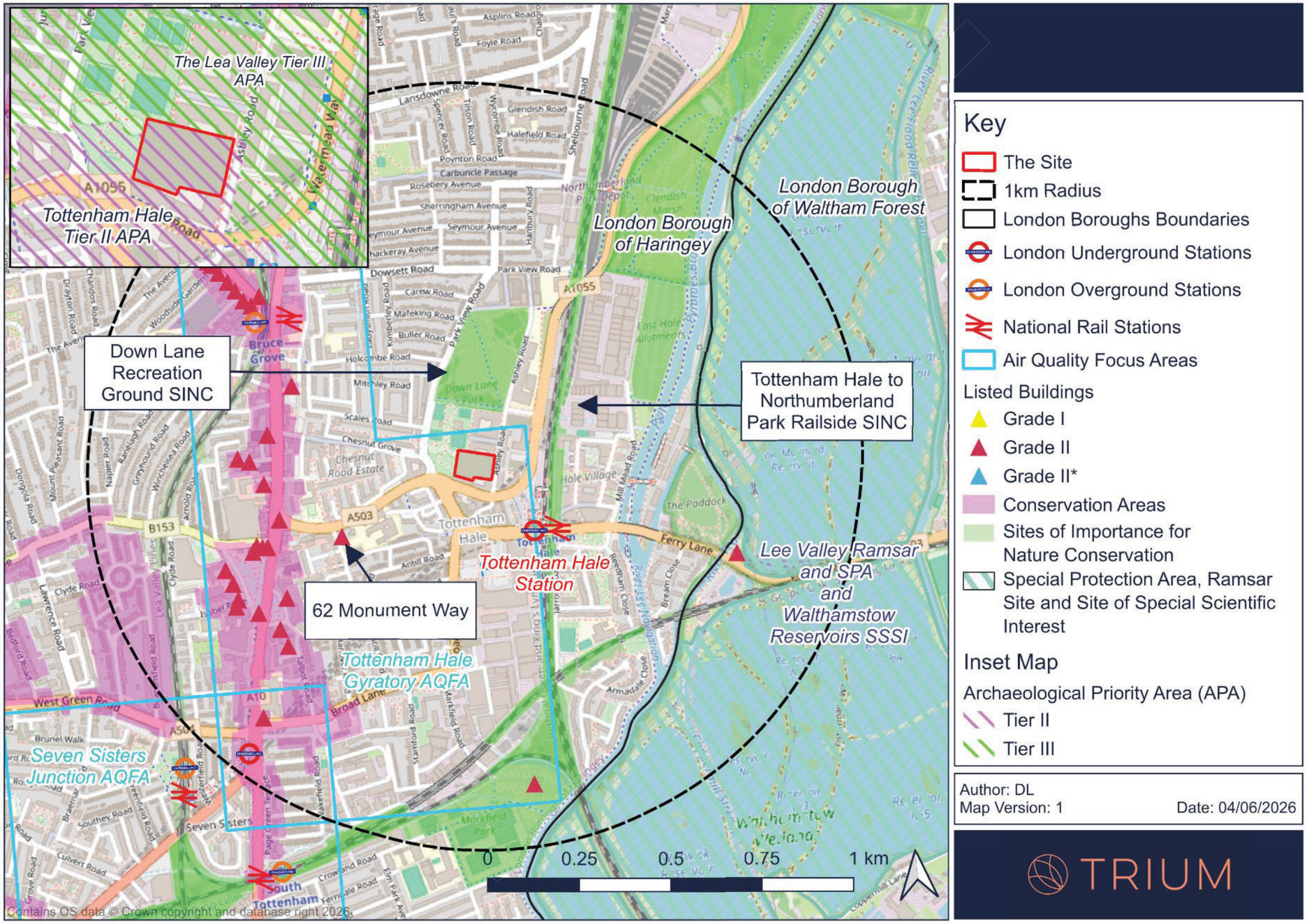
Environmental Topic	Key Features and Designations
	• There are no Scheduled Monuments within 1km of the site.
Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution	• A number of potential sensitive receptors are located within the immediate vicinity of the site. These include the high rise mixed-use (primarily residential and commercial) buildings immediately adjacent to the site to the north and south (the southern building constituting Plot D of the "SDP sites" cumulative scheme). This is in addition to the terraced houses (1-21 Hale Road) that also directly border the site to the south. • There are also several other high rise mixed-use buildings within close proximity to the site, primarily along Ashley Road (which includes the recently completed Berol House scheme and Plot E of the "SDP Sites" cumulative scheme). • The site is directly adjacent to Down Lane Park to the north and west of the site. There are several sensitive receptors within this communal open space, including: – Basketball courts; – Play space; – Tennis courts; – A football pitch; and – Tottenham Hale Community Centre.
Ecology and Biodiversity	• The Lee Valley Special Protected Area (SPA) is located approximately 550m east of the site. This SPA overlaps entirely with the Lee Valley Ramsar Site. The Epping Forest Special Area of Conservation (SAC) is located approximately 4.5km east of the site (at its nearest point). • There are several Sites of Special Scientific Interest (SSSIs) within 5km of the site. Namely, the Walthamstow Reservoirs SSSI (ranging approximately 570m-1km east and southeast), the Walthamstow Marshes SSSI (approximately 1.74km southeast), the Chingford Reservoirs SSSI (approximately 3.76km northeast), and the Epping Forest SSSI (approximately 4.5km east of the site (at its nearest point)). There are no National Nature Reserves (NNRs) within 5km of the site. • The Springfield Park Local Nature Reserve (LNR) is located approximately 1.82km south of the site. • There is a total of 6 Sites of Importance for Nature Conservation (SINCs) within 1km of the site. The SINCs nearest to the site are Down Lane Recreation Park (approximately 116m north) and Tottenham Hale to Northumberland Park Railsides (approximately 145m east). • There is a total of 38 Biodiversity Action Plan (BAP) Priority Habitats within 1km of the site, all of which are deciduous woodland. • There are no Great records of Crested Newt Ponds within 200m of the site.
Ground Conditions and Land Contamination	• Available geological information[8] indicates the bedrock of the site is comprised of the London Clay Formation (a mixture of clay, silt and sand). The bedrock is overlain by superficial deposits of Enfield Silt Member-Clay and silt. • The site is located within a groundwater Source Protection Zone (SPZ) II (Outer Protection Zone), where the groundwater is most vulnerable to pollution given its close proximity to an abstraction point for domestic supply or food production purposes. The site is also 400m northwest of a SPZ I (Inner Protection Zone), which is the area immediately around an abstraction point or domestic supply.
Noise and Vibration	• The dominant sources of noise and vibration for the site would be traffic from the adjacent roads (Hale Road and Ashley Road). • Tottenham Hale Underground and National Rail station is located approximately 130m southeast of the site. As a result, baseline vibration may therefore be present. • Potential sensitive receptors include adjacent residential high rise buildings high rise mixed-use (primarily residential and commercial) buildings immediately adjacent to the site to the north and south, in addition to the terraced houses (1-21 Hale Road) that also directly border the site to the south. • There are also several other high rise mixed-use buildings within close proximity to the site, primarily along Ashley Road. • The site is directly adjacent to Down Lane Park to the north and west of the site. • There is a significant amount of further residential land use within 300m of the site, including student accommodation, which have potential to be sensitive to construction noise and vibration.
Socio-Economics and Health	• The closest early years school is Pavillion Pre School, located approximately 60m north of the site within the Tottenham Hale Community Centre (within Down Lane Park ground). Welbourne Children's Centre, also a Pre School, is located approximately 320m southwest of the site. The closest primary school is Holy Trinity Church of England Primary School, located approximately 400m west of the site. Ferry Lane Primary School is also located approximately 510m southeast of the site. The closest secondary school is Harris Tottenham Academy, located approximately

[8] *British Geological Survey (2024), BGS Geology Viewer*

Environmental Topic	Key Features and Designations
	145m north of the site. The closest sixth form college to the site is Capital City College Tottenham Centre, approximately 690m southwest. • The closest GP Surgery to the site is Welbourne Medical Centre, located approximately 100m west of the stie. The closest hospitals to the site with an A& E facility is the North Middlesex University Hospital approximately 2.5km north of the site. • From an employment perspective many of the high-rise buildings surrounding the site, while primarily consisting of residential use, have commercial space at ground floor level, which at present consist mostly of cafes. Moreover, Tottenham Hale Retail Park is located approximately 170m south of the site, which consists of a number of retail outlets, cafes and restaurants. Additionally, the Premier Inn London Tottenham Hale hotel is located approximately 60m south of the site on Ferry Island.
Heritage, Townscape and Visual Impacts	• There are 36 listed buildings within a 1km radius of the site. Of these, one is designated Grade II*, and 35 are designated Grade II. The closest listed building to the site is 62 Monument Way (Grade II). • The closest Conservation Area (CA) to the site is the Tottenham Green CA, which is located approximately 410m west of the site. Also within 1km of the site is the Bruce Grove CA (460m northwest), Seven Sisters/Page Green CA (approximately 670m southwest), and North Tottenham CA (approximately 850m northwest), and Bruce Castle CA (approximately 975m northwest). • There are no Registered Parks and Gardens, Scheduled Monuments, or World Heritage Sites within 1km of the site. • The site is not located within, and therefore does not have the potential to impact, any Strategic Views identified within the LBH local plan, nor any Landmark Viewing Corridors identified in the London View Management Framework.
Traffic and Movement	• The sites Public Transport Access Level (PTAL) is 5 for the majority of the site, and 6a for the western section of the site (scale from 0-6b)[9]., which means the level of accessibility is very good. • The closest bus stop to the site is Tottenham Hale Bus Station, which is located approximately 75m southeast of the site. Bus services available from this bus station include the 41, 192, 76, W4, 123 and 230. • Tottenham Hale Station is located approximately 135m southeast of the site. This station provides access to the Victoria Line underground services and National Rail services. Also within 1km of the site is the Bruce Grove London Overground and National Rail Station approximately 630m northeast of the site, and Seven Sisters Underground Station approximately 940m southwest of the site.
Wind Microclimate	• Winds for the London area are predominantly from the southwest, with a secondary peak from the northeast during spring. Winds are typically stronger in the winter season, and lighter throughout the summer. • The site is located in an urban area with potential sensitive receptors being high rise buildings surrounding the site to the north, east and south, as well as the public open space to the west of the site.
Water Resources, Flood Risk and Drainage	• The entirety of the site is located within Flood Zone 2. This means there is a medium probability of flooding from rivers or the sea (between 0.1-1% annual probability). • The vast majority of the site is not at risk from surface water flooding. There are very small sections of the site which are at low risk of surface water flooding at the boundaries of the site. The nearest water body to the site is the River Lea, located approximately 400m to the east of the site. Beyond the River Lea are the 10 reservoirs that comprise the Walthamstow Reservoirs. The closest reservoir to the site is the Lockwood Reservoir (approximately 500m to the east), with the water bodies extending well beyond 1km from the site to the northeast, east and south. • There are overlapping Drinking Water Safeguard Zones (DWSZs) and Drinking Water Protected Areas (DWPAs) located (approximately 380m to the east of the site and extending well beyond 1km northeast, east and south of the site. These DWSZs and DWPAs cover the aforementioned Walthamstow Reservoirs (excluding reservoirs 1-3). The site is located within a Source Protection Zone (SPZ) 2 which are defined by the Environment Agency and the zone within which 400 days of groundwater travel time to the abstraction point applies. • The site is not located within a Groundwater Vulnerability Area.

[9] *Transport for London, WeBCAT Public Transport Access Level Tool.*

Figure 4 Environmental Context



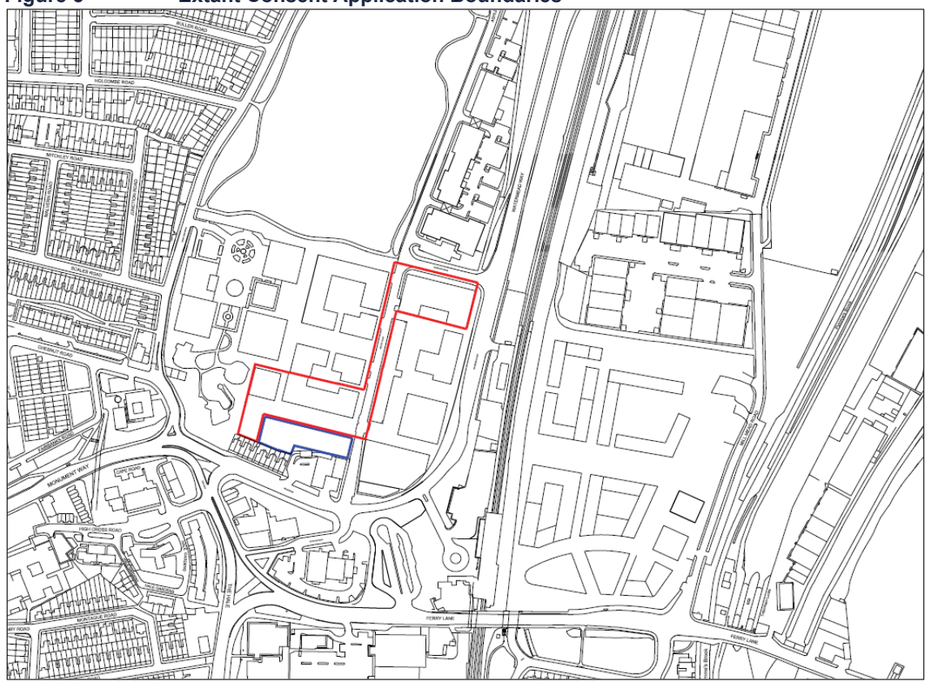
Planning History

33 Part of the site previously formed part of a wider outline application submitted in 2016 by Notting Hill Home Ownership Ltd and granted in 2018 under planning application reference: HGY/2016/4165. The application was for the demolition of the existing buildings and the erection of three new buildings ranging from +25.400m AOD to +64.725m AOD for the creation of up to 265 dwellings and 3,600m^2 (GIA) of commercial floorspace (Class A1/A3/B1/D1). The site formed part of this wider masterplan which comprised both the site and the area known as the 'Cannon Factory' site. This application was supported by an ES. Subsequent reserved matters and non-material amendment applications have been submitted in line with the original consent of which are detailed within Table 3 below.

34 Subsequently, a full planning application for Ashley Park submitted in 2019 which was submitted to the southern section of the site. This area of the site sat outside the planning application boundary under planning application reference: HGY/2019/0108. The application was refused by the LBH in 2019. This application was not supported by an ES. This was subsequently approved at appeal under APP/Y5420/W/19/3232707. A non-material amendment was submitted under planning application reference: HGY/2022/4229 relating to condition wording changes to enable implementation.

35 These previous applications have been presented below in Figure 5.

Figure 5 Extant Consent Application Boundaries[10]



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

36 Together both applications include the extent of the site which is the subject of this EIA Scoping Report and forthcoming full planning application.

37 A summary of the planning history relating to the site is included in Table 3 below.

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

Table 3 Site Planning History

Planning Reference	Description of Development	Decision	Date of Decision
HGY/2016/4165	Demolition of the existing buildings at Ashley House and Cannon Factory and erection of three buildings to provide up to 3,600sqm of commercial floorspace (GEA) (Class A1/A3/B1/D1), up to 265 residential units (Class C3), new public realm, landscaped amenity space, car and cycle parking and all associated works. (Outline planning application).	Approved	02/5/2018
HGY/2018/2210	Non-material amendments to Condition 6 (Approved Drawings) following a grant of outline planning permission HGY/2016/4165	Approved	08/08/2018
HGY/2018/2353	Reserved Matters of appearance, landscaping, layout, scale and access and discharge of Condition 1 of outline planning application HGY/2016/4165 for the Demolition of the existing buildings at Cannon Factory and Ashley House and erection of three buildings to provide 3,171 sqm of commercial floorspace (GEA) (Class A1/A3/B1/D1), and 256 residential units (Class C3), new public realm, landscaped amenity space, car and cycle parking and all associated works. An Environmental Statement was submitted with the outline planning application.	Approved	14/11/2018
HGY/2022/4230	Non-Material Amendment (NMA) to planning permission HGY/2016/4165 to enable changes to be made to Conditions 18, 19, 20, and 23 to allow for site demolition, site clearance, and proposed drainage works to be carried out prior to submission of details; The removal of the restrictions under Conditions 21 and 29 as they are no longer necessary; and a correction to the title of Condition 30 to reflect the wording of the main body of the Condition text.	Approved	03/3/2023
HGY/2023/0890	Non-Material Amendment (NMA) to planning permission HGY/2016/4165 to enable changes to be made to the wording of Condition 25 to allow for site demolition works to be carried out prior to submission of details.	Approved	05/4/2023
HGY/2019/0108	Demolition of existing buildings and erection of a part 6, part 8 storey building to provide 97 residential units (Class C3), 170 sqm of commercial floorspace (Class A1/A3/B1), new public realm, car and cycle parking and associated works	Refused	10/04/2019
APP/Y5420/W/19/3232707		Approved	16/04/2020
HGY/2022/4229	Non-Material Amendment (NMA) to planning permission HGY/2019/0108 (Allowed on Appeal APP/Y5420/W/19/3232707) to enable changes to be made to Conditions 12, 14, and 15 to allow for site demolition, site clearance, and proposed drainage works to be carried out prior to submission of details.	Approved	03/03/2023

THE PROPOSED DEVELOPMENT

Overview of the Proposed Development

38 The Proposed Development will likely comprise of the following:

- Construction of a shared-living block of up to approximately 24 storeys with a maximum of 90m AOD, providing up to approximately 540 shared-living units, and a six-storey block consisting of up to 87 affordable homes;
- Up to 500m^2 of commercial/employment and community floorspace (Use Class E and F2) will be split at the ground floor levels of the shared-living and affordable block;

- Landscaping and new public realm;
- The Proposed Development will be car free with the exception of blue badge parking. Provisions will be made for vehicle, cycle and pedestrian access arrangements as well as cycle storage in accordance with current policy requirements;
- The Energy Strategy is likely to be electricity-led and consists of Air Source Heat Pumps (ASHP). Mechanical Ventilation Heat Recovering Units are expected to be provided for each of the units;
- Provision will be made for a mix of publicly accessible and private open space, including children's playspace; and
- No basements are proposed however, there will be a sunken slabs.

PLANNING POLICY CONTEXT

39 The ES, within **EIA Methodology,** will define the relevant adopted regional and local planning policy context, as well as identifying any relevant material considerations such as the National Planning Policy Framework ('NPPF')[11]. Specifically, the ES will list out the key relevant policy documents but will not discuss the policies within these in any detail.

40 Although relevant policies out of the key planning policy documents will, in some instances, inform the scope and the methodology of the technical assessments within the EIA, an assessment of the Proposed Development against relevant planning policy and guidance will be contained within the Planning Statement, which will be a standalone document that is submitted in support of the planning application. It is not the purpose of the ES to appraise the Proposed Development against relevant national, regional and local planning policy standards/ targets.

41 Where planning policy informs the scope and the methodology of the technical assessments of the EIA, the policies will be presented in the ES (in the relevant technical topic chapters) and discussed as necessary. Any policy detail required to support the relevant impact assessment scope, methodology or assessment of effects, will either be provided within the technical topic chapter itself or within an appendix to the ES.

National Planning Policy and Guidance

42 The EIA will be undertaken having regard to the NPPF (February 2025). The NPPF sets out the Government's economic, environmental and social planning policies for England. The policies contained within the NPPF articulate the Government's vision of sustainable development, which are intended to be interpreted at a local level, to meet the requirements of local aspirations.

43 As relevant to the EIA, specifically to the scope, methodology and assessment of effects for the EIA's technical topics, the NPPF shall be considered throughout the EIA process and during the preparation of the ES.

44 The EIA will also refer, as relevant to the EIA technical topics, the Planning Practice Guidance ('PPG')[12], which is an online resource. The PPG aims to make planning guidance more accessible, and to ensure that the guidance is kept up to date.

Regional Planning Policy and Guidance

45 As relevant to the EIA technical topic scope, methodology or assessment of effects, the ES will have regard to the following key regional planning documents. Any additional strategic planning policy and guidance documents considered relevant to the technical assessments which are covered by the EIA will also be considered:

[11] *Department for Levelling Up, Housing and Communities, 2023, National Planning Policy Framework*
[12] *Department for Levelling Up, Housing and Communities. (2016). Planning Practice Guidance. (Online). Available at: https://www.gov.uk/government/collections/planning-practice-guidance*

- The London Plan: The Spatial Development Strategy for Greater London (March 2021)[13] – hereafter referred as 'the London Plan'; and
- Supplementary Planning Guidance[14] ('SPG') (i.e. further guidance on policies in the London Plan that can't be addressed in sufficient detail in the plan itself).

London Borough of Haringey Local Plan

46 The LBH, Local Development Framework comprises of the LBH Local Plan (2013)[15]. It was formally adopted in 2013 and was updated in July 2016.

47 The Local Plan is the principal document guiding development and growth within the LBH and covers the period up until 2026. It consists of the Spatial Strategy and Strategic Policies. The site falls within the Tottenham Hale Urban Centre Masterplan Supplementary Planning Document which was adopted in 2006. This allocation looks to revitalise the Tottenham Hale area with LBH entering into an SPD with Argent Related to bring forward thousands of new homes and new commercial, retail, leisure and open spaces. town centre through additional retail, office, leisure, entertainment, cultural and housing.

48 Additionally, the LBH is currently producing a new Local Plan to set out the Council's vision for the development across LBH over the 15 year period up to 2040[16]. It will provide a succinct and up-to-date framework for addressing the borough's housing needs and other economic, social and environmental priorities. It will also give local people a platform to shape their surroundings. The preparation of the new Local Plan will include several stages of drafting and consultation. The initial stage sets out the themes of the Local Plan and consider issues and options for its development (Regulation 18). The consultation ran from 10 October 2025 until 19 December 2025. Under the draft local plan, the site does not form part of any emerging site allocations however, forms part of the Opportunity Areas within the adopted London Plan. The site forms part of Policy SS1: Spatial Strategy – A Place Where We Can All Belong and Thrive within the draft Local Plan.

49 Further relevant local planning documents are the Supplementary Planning Documents (SPD) providing further detail on Planning Obligations, Sustainable Design and Construction[17].

Other Guidance

50 In addition to any relevant planning policies that inform the scope, methodology or assessment of effects, as relevant, the technical topic chapters of the ES will present a summary of any pertinent recognised industry guidance documents.

EIA METHODOLOGY

EIA Methodology and Approach to Assessment of the Proposed Development

51 In addition to the EIA Regulations, there is also guidance available that has been referenced where appropriate, including but not limited to:

- In February 2020, the Withdrawal Agreement[18] came into force that established the terms of the United Kingdom's orderly withdrawal from the European Union (EU). As the UK is no longer part of the EU, it is not required to adhere to EU laws (regulations, directives, decisions) or guidance. Nonetheless, reference has still been made to the European Commission's (EC's) various EIA

[13] *Greater London Authority (2021): London Plan*
[14] *London Assembly, List of Adopted SPGs: https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance*
[15] *London Borough of Haringey (2013). Haringey Local Plan: Strategic Policies. Available at: Local Plan: Strategic Policies | Haringey Council*
[16] *London Borough of Haringey (2025): Haringey Draft Local Plan. Available at: Draft Local Plan | Haringey Council*
[17] *London Borough of Haringey: Supplementary planning documents (Online). Available at: Supplementary planning documents and guidance | Haringey Council.*
[18] *European Commission (2019); The EU-UK Withdrawal Agreement. Available at: https://ec.europa.eu/info/strategy/relations-non-eu-countries/relations-united-kingdom/eu-uk-withdrawal-agreement_en*

guidance documents as these currently remain in line with the UK's EIA Regulations, and therefore provide helpful guidance[19];

- At a domestic level, reference has been made to the Department for Levelling Up, Housing and Communities overarching Planning Practice Guidance (PPG)[20];
- In addition, the Highway England's Design Manual for Roads and Bridges 'Sustainability and Environment' – LA 104 (Environmental Assessment and Monitoring)' has been referred to as applicable;
- In relation to publications from professional bodies, reference has been made to Institute of Environmental Management and Assessment (IEMA) publications as these include best practice/suggested improvements to the EIA process. This includes:
- IEMA 'ES Review Criteria' (COM3-6)[21];
- IEMA 'Guidelines for Environmental Impact Assessment' (2004)[22];
- IEMA 'Special Report into the State Environmental Impact Assessment Practice in the UK' (2011)[23];
- IEMA 'Shaping Quality Development' (2015)[24];
- IEMA 'Delivering Quality Development' (2016)[25];
- IEMA 'Delivering Proportionate EIA' (2017)[26];
- IEMA 'Materials and Waste in EIA' (2020)[27];
- IEMA 'Climate Change Resilience and Adaption' (2020)[28];
- IEMA 'Major Accidents and Disasters in EIA: A Primer' (2020)[29];
- IEMA 'Principles of Cultural Heritage Impact Assessment in the UK' (2021)[30];
- IEMA 'Guide to Effective Scoping of Human Health' (2022)[31];
- IEMA 'Determining Significance for Human Health in Environmental Impact Assessment' (2022)[32];
- IEMA 'A New Perspective on Land and Soil in Environmental Impact Assessment' (2022)[33] ;
- IEMA 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (2022)[34]; and
- IEMA 'Environmental Assessment of Traffic and Movement' (2023)[35];
- IEMA 'Effective Non-Technical Summaries for Environmental Impact Assessment' (2023)[36]; and

[19] *European Commission (n.d.); Environmental Impact Assessment. Available at: http://ec.europa.eu/environment/eia/eia-support.htm*
[20] *Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2023); Environmental Impact Assessment. Available at: http://www.gov.uk/guidance/environmental-impact-assessment*
[21] *IEMA, undated; EIA Quality Mark – ES Review Criteria COM 3-6.*
[22] *IEMA, (2004); Guidelines for Environmental Impact Assessment.*
[23] *IEMA, (2011); The State of Environmental Impact Assessment Practice in the UK.*
[24] *IEMA, (2015); Shaping Quality Development.*
[25] *IEMA, (2016); Delivering Quality Development.*
[26] *IEMA, (2017); Delivering Proportionate EIA.*
[27] *IEMA, (2020); Materials and Waste in EIA.*
[28] *IEMA, (2020); Climate Change Resilience and Adaption'*
[29] *IEMA, (2020); Major Accidents and Disasters Guidelines*
[30] *IEMA, (2021); Principles of Cultural Heritage Impact Assessment in the UK*
[31] *IEMA, (2022); Guide to Effective Scoping of Human Health*
[32] *IEMA, (2022); Determining Significance for Human Health in Environmental Impact Assessment*
[33] *IEMA, (2022); A New Perspective on Land and Soil in Environmental Impact Assessment*
[34] *IEMA, (2022); Assessing Greenhouse Gas Emissions and Evaluating their Significance*
[35] *IEMA, (2023); 'Environmental Assessment of Traffic and Movement'*
[36] *IEMA, (2023); Effective Non-Technical Summaries for Environmental Impact Assessment.*

- IEMA 'Implementing the Mitigation Hierarchy from Concept to Construction' (2024)[37].
- Whilst primarily written for major infrastructure projects, reference is also made to guidance/ advice notes published by the National Infrastructure Planning, Planning Inspectorate, where appropriate, as these can include relevant/helpful information[38];
- Applicable case law; and
- Topic specific guidance and assessment criteria, where appropriate.

52 In accordance with the EIA Regulations and best practice guidance documents, the EIA will comprise an assessment for each of the relevant technical topics against an appropriate baseline condition of the site and surrounding area, using methods of prediction including established standards and industry guidelines and techniques confirmed as part of the EIA Scoping process. In all cases, the source data and guidance used to establish the baseline conditions and assessment methodology will be clearly set out within the ES.

Baseline Conditions

53 Baseline assessments will utilise any existing and available information, as well as new information either collected through baseline surveys undertaken during the course of the EIA process or additional information provided as part of the EIA Scoping Opinion and consultation process. This information will be used to present an up to date description of the current baseline conditions of the site and surrounding area within the ES (within the individual technical chapters).

54 In addition, as per the requirements of the EIA Regulations, consideration as to how the current baseline conditions may evolve in the future in the absence of the Proposed Development will also be presented in the ES (within the individual technical chapters).

Sensitive Receptors

55 When undertaking an EIA, it is important to identify potential environmental receptors which may be impacted by the Proposed Development and may need to be considered as part of the assessment.

56 The environmental receptors that may be sensitive to change are identified and discussed within the scope of each technical topic in this Scoping Report (hereafter referred to as 'sensitive receptors'). The sensitive receptors outlined within this Scoping Report have been identified at the time of writing this Scoping Report, as part of the EIA scoping process; however, these will be reviewed during preparation of the ES and therefore may be subject to change.

Enabling Works and Construction

57 The ES (within a non-technical chapter titled ('Enabling Works and Construction') will provide an outline of the anticipated enabling works and construction programme and related activities and aspects (i.e. enabling works, substructure works, superstructure works etc., construction material quantities, Heavy Goods Vehicle (HGV) movements and HGV routing) and be based upon the detailed drawings submitted for approval.

58 In addition, key environmental controls and management measures relevant to the Proposed Development (including relevant codes of construction practice) will be presented in the ES chapter. It is currently envisaged that the Proposed Development as one phase. Any assumptions made regarding indicative phasing for the purposes of assessment will be clearly set out and assessed as appropriate within the ES. If required, the ES will consider introduced receptors where there are earlier phases / blocks completed ahead of all works being completed.

[37] *Institute of Environmental Management and Assessment, 2024; Implementing the Mitigation Hierarchy from Concept to Construction. These guidelines now supersede both IEMA 'Shaping Quality Development' (2015) and IEMA 'Delivering Quality Development' (2016)*
[38] *National Infrastructure Planning (n.d.); Welcome to National Infrastructure Planning. Available at: https://infrastructure.planninginspectorate.gov.uk/*

59 This information will inform the enabling works and construction impact assessments. Throughout the enabling works and construction impact assessments, the assumption will be made that the standard environmental controls required under legislation and best practice guidance are met as a matter of course.

60 The assessment of the potential for likely significant effects arising during the enabling works and construction will be addressed within each of the individual technical assessment chapters of the ES and will be assessed against the existing Baseline Conditions. The assessment will take into consideration any other surrounding development schemes which are likely to be under construction at the same time as the Proposed Development. The enabling works and construction assessments presented within the technical chapters of the ES will identify the need for any additional or bespoke environmental management or mitigation measures in order to avoid, prevent, reduce or off-set any significant adverse effects identified. In addition, where appropriate, the enabling works and construction assessments will consider the phasing of works and the subsequent potential for impacts to occur upon introduced receptors to the site - e.g., enabling works and construction effects associated with later phases of development upon early occupiers on-site. The approach to this will be clearly set out within the ES.

61 The ES will present enabling works and construction related effects both without mitigation measures included (unless embedded mitigation measures have been identified) and with mitigation measures applied. The latter effects constitute the 'residual effects' identified as part of the assessment.

62 Where required, a description of any proposed monitoring arrangements will also be presented and would define (where appropriate) the procedures regarding the monitoring of the relevant significant adverse effects, the types of parameters to be monitored and the monitoring duration.

63 All the measures proposed within the technical chapters or detailed within this Scoping Report will be compiled and presented in a mitigation and monitoring schedule (to be presented as a separate chapter within Volume 1 of the ES).

64 It is anticipated that any required enabling works and construction related environmental management/ mitigation and monitoring measures would be secured and controlled through an appropriate Construction Environmental Management Plan (CEMP) (or equivalent) and it is proposed that the requirement for these documents be secured by means of suitably worded planning conditions to be attached to the permission (if granted). Key mitigation and management controls that would later form part of a CEMP will be presented in the ES to help define the policies, procedures and management framework for the implementation of any identified specific environmental management and mitigation controls and monitoring.

Completed Development

65 A detailed design (scale layout, appearance, amount of development and landscaping) in respect of the Proposed Development shall be submitted for approval.

66 The ES will present a description of the Proposed Development within **The Proposed Development** chapter in **ES Volume 1**. Sufficient information on the Proposed Development will be presented to allow an understanding of the development being proposed, in order to enable the assessment of potential and likely significant environmental effects of the completed and operational development. Any assumptions made will be clearly presented in the narrative. The Proposed Development will be the subject of plans, sections and elevations and these will be used as the basis of the assessment of the likely environmental and socio-economic effects within the ES.

67 The EIA will also assess the amount of development across the mix of uses sought for approval. Any flexibility sought in respect of Use Class E will be appropriately stated and assessed.

68 The ES will present a description of the Proposed Development in order to provide suitable context to enable the assessment of potential and likely significant environmental effects. Enough information on

the Proposed Development, in terms of the key aspects, will be presented to allow an understanding of the development being proposed, in order to enable the assessment of potential and likely significant environmental effects of the completed and operational development. Any assumptions made will be clearly presented in the narrative.

Assessment Scenarios

69 The main assessment scenarios to be assessed within the EIA are:

- **Baseline Conditions (2026 or relevant alternative year[39; 40])** – Reflecting the existing baseline conditions on the site and within the surrounding area, or including a future baseline as appropriate to a technical topic;
- **Enabling Works and Construction** – An assessment of the potential enabling works and construction effects associated with the Proposed Development against baseline conditions;
- **Fully Complete and Operational** – An assessment of the potential effects when the Proposed Development is complete and operational against baseline or future baseline conditions; and
- **Cumulative** – An assessment of the potential cumulative effects of the Proposed Development with other surrounding consented, proposed or likely future (e.g. allocated sites) schemes both during construction and once the Proposed Development is complete and operational. Refer to **Annex C: Cumulative Schemes** for future details on the full list of cumulative schemes which are to be considered within the Cumulative Effects Assessment completed.

70 There may also be a First / Phased Occupation assessment – An assessment of the potential effects when particular phases of the Proposed Development are complete and operational, but construction works on the remaining phases are ongoing. This assessment may be against an existing baseline or future baseline condition, depending on the technical topic.

Environmental Design Management Measures

71 Throughout the EIA (including this Scoping Report and the ES), where applicable, the way that likely environmental effects have been or will be avoided, prevented, reduced or offset through design and/ or management measures will be described. These are measures that are inherent in the design and construction of the Proposed Development (also known as 'embedded measures'). Where known at this stage, some of these embedded measures have been identified at the EIA Scoping stage and are described, where relevant, in the technical topic appendices.

72 Embedded measures relevant to the construction phase will be summarised within **Environmental Management, Mitigation and Monitoring Schedule** chapter in **ES Volume 1**. These measures are to be included within a CEMP, the requirement for which is proposed to be secured via an appropriate planning condition.

73 Once completed and operational, such embedded measures will be integral to the Proposed Development.

74 All embedded mitigation and enhancement measures will be described within the Proposed Development chapter of the ES, with the rationale for the inclusion of the identified embedded measures and the associated commitment to implementing such measures clearly stated. Other required mitigation measures and any monitoring requirements will be summarised within the **Environmental Management, Mitigation and Monitoring Schedule** ES chapter, located within **ES Volume 1**.

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[39] *For some assessments, such as air quality and noise and vibration, when assessing the effects of the operation of the Proposed Development, these will include a projected environmental condition in the future (i.e., 'future baseline'), at the year of opening of the Proposed Development (if relevant a different future year appropriate/specific for the technical assessment may be used).*

[40] *The temporary interim uses may be qualitatively considered separately within the ES, as relevant.*

Cumulative Effects and Effect Interactions

75 The cumulative assessment will be based on the information available on the local authorities planning register. Generally, the schemes (referred to as 'cumulative schemes') included within the cumulative effects assessment fall under one (or more) of the following criteria:

- 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 10,000m^2 GEA of mixed-use floorspace or, provide over 150 residential units; or

  Office to residential conversions (granted under the General Permitted Development Order) giving rise to over 150 residential units; or
- Any development/change of use adjacent to the site.

76 By applying an initial screening exercise (using the above criteria) to all the surrounding redevelopment schemes, the cumulative effects assessment of the EIA becomes more focused on the larger schemes (i.e., those schemes with the most potential to interact in a cumulative manner).

77 Therefore, a preliminary list of cumulative schemes for consideration within the EIA has been identified and is presented in **Annex C.** As part of this EIA Scoping process, the LBH (and other consultees, as relevant) is invited to comment on the proposed cumulative schemes, so that the list of cumulative schemes can be agreed.

78 Each technical chapter of the ES will consider the potential for cumulative effects associated with the schemes identified for inclusion within the cumulative effects assessment. Each technical ES chapter will be clear on the cumulative schemes that have been considered within the cumulative effects assessment.

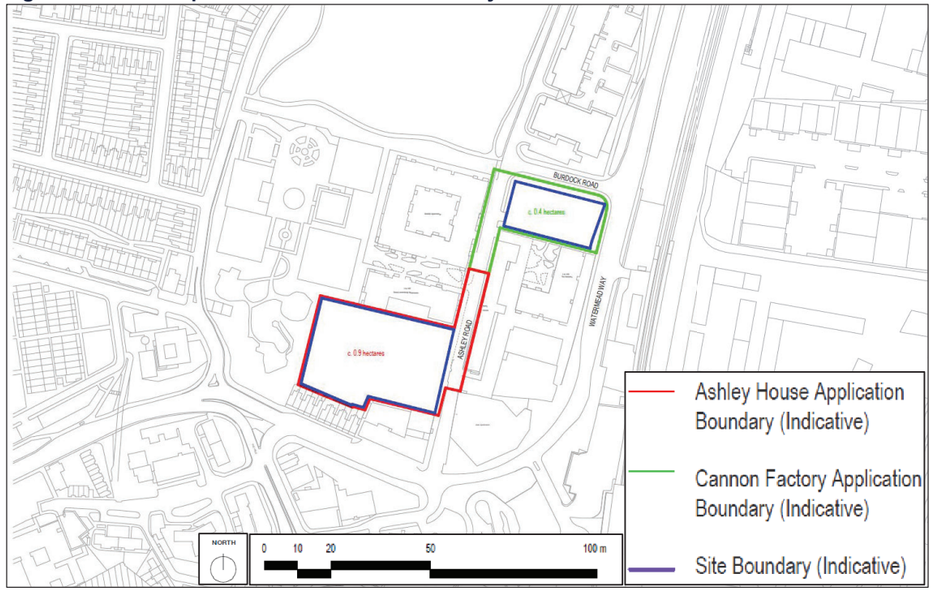
79 Other schemes that are under construction, but where the construction works are significantly progressed (i.e. likely to be completed before the opening year of the Proposed Development / first occupation on-site) or where early phases are occupied, will be factored into the baseline scenario for assessment.

80 It is acknowledged the Applicant intends to bring forward a standalone application on the Cannon Factory site, as shown in Figure 6 below however, the design is at an early stage with limited information on the emerging development available. Notwithstanding this, where possible and subject to the information available at the time, the technical assessments of the ES will consider Cannon Factory in terms of its broad parameters as a separate tiered cumulative scenario by reviewing any additional or different cumulative effects associated with the proposals based on an indicative massing, building footprint and quantum of development. This will be a qualitative review with the level of technical review differing on a topic-by-topic basis. This position will be reviewed at the point of assessment.

81 At this stage, the following cumulative assessments are proposed:

- Tier 1 Cumulative Assessment – the Proposed Development with cumulative schemes, as described in **Annex C**; and
- Tier 2 Cumulative Assessment – the Proposed Development with cumulative schemes, as described in **Annex C**, in addition to qualitative consideration of the emerging proposals for the Cannon Factory across the enabling and construction works and once the Proposed Development and surrounding cumulative schemes are complete and operational.

Figure 6 Spatial Extent of Cannon Factory to the Site



Effect Interactions

82 The ES will summarise the likelihood for in-combination effects or 'effect interactions'. Effect interactions occur because of interactions between multiple individual effects associated with just one project i.e., the combination of individual effects arising as a result of the Proposed Development, for example effects in relation to noise and airborne dust on a single receptor.

83 Effect Interactions from the Proposed Development itself on particular receptors at the site and within the surrounds will be considered during the enabling works and construction, and also once the Proposed Development is completed and operational. Dependent on the relevant sensitive receptors, the assessment will focus either on key individual receptors or on groups considered to be most sensitive to potential effect interactions. The potential interaction of residual effects that are of minor, moderate or major scale, will be considered within this assessment. Based on the definitions of what negligible effects comprise for each of the technical assessments as presented in this ES, these do not warrant further consideration in relation to in-combination effects and have therefore not been pulled through into the assessment of effect interactions.

84 There is no established methodology for assessing the impact of cumulative effects on a particular receptor. The interaction of a combination of individual effects would be determined to be either 'not significant' or '**significant**', a scale of the combined effects (minor, moderate or major) would not be applied. If one of the individual effects is '**significant**', the combination of effects would be regarded as '**significant**'. If none of the individual effects are significant, consideration will be given as to whether or not the combination of many not significant effects could result in a combined significant effect, based on professional opinion.

85 Consideration of effect interactions will be presented within the ES in a specific chapter (i.e. **Effect Interactions** chapter, within **ES Volume 1**).

Alternatives and Design Evolution

86 The EIA Regulations (Schedule 4) require that the ES provides *'a description of the reasonable alternatives […] relevant to the proposed project and its specific characteristics'* which have been

considered by the Applicant and *'an indication of the main reasons for selecting the chosen option, including comparison of environmental effects'*.

87 The ES will summarise the evolution of the Proposed Development, the alternatives considered (if relevant), and key modifications made during the design process. Environmental considerations which have influenced this process will be discussed. Matters that will be considered in terms of design evolution include land uses, layout, parcel heights and massing. The preferred design alternative, culminating with the Proposed Development being sought for approval, will be discussed.

88 A specific chapter, **Alternatives and Design Evolution** in **ES Volume 1**, will present this information.

DETERMINING EFFECT SIGNIFICANCE – TERMINOLOGY AND APPROACH

Reference to 'Impact' and 'Effect'

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

Receptor Sensitivity and Magnitude of Impact

90 To achieve a consistent approach across the different technical disciplines addressed within the **ES** (**Volume 1** and **Volume 2**), assessments will broadly define the sensitivity of the receptors that could be affected by the Proposed Development and the magnitude of impact or change from the baseline conditions in order to derive the resultant effect. Technical specialists will use their own approach or amend the approach stated below based on what is appropriate for their assessments (i.e. to align with relevant technical guidance).

91 Terminology to describe the sensitivity of receptors and magnitude of impact or change from the baseline conditions is broadly as follows:

- High;
- Medium;
- Low; or
- Negligible.

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

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

Identification of a Resultant Effect

94 The basis for determining the resultant effect generally takes into account the sensitivity of the receptor and magnitude of impact or change from the baseline conditions. A generic matrix that combines the sensitivity of the receptor and the magnitude of impact to identify the resultant effect is provided within Table 4. Each technical chapter will set out their basis for determining scale of effects.

Table 4 Resultant Effects

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

95 The categories and definitions of the 'scale' of the resultant effect i.e., definitions of 'Major', 'Moderate', 'Minor' and 'Negligible' effects will be adjusted to suit the technical topic in question; and, where this is the case, revised definitions of effect scale will be presented in the technical assessment chapters of the **ES** (**Volume 1**) and in **ES Volume 2**.

96 Where there is no impact to a receptor and therefore no effect, this will be stated.

Effect Nature

97 Table 5 provides definitions of the 'nature' of the resultant effect i.e., definitions of 'Adverse', 'Neutral' and 'Beneficial'. Typically, the 'nature' of an effect is defined where the 'scale of the effect' is classified as minor, moderate or major (i.e. the 'nature' is not defined for effects classified as negligible in scale).

Table 5 Definition of the Nature of the Resultant Effect

Type of Effect	Description
Adverse	Detrimental or negative effects to an environmental / socio-economic resource or receptor. The quality of the environment is diminished or harmed.
Neutral	The quality of the environment is preserved or sustained or there is an equal balance of adverse and beneficial effects.
Beneficial	Advantageous or positive effect to an environmental / socio-economic resource or receptor. The quality of the environment is enhanced.

Geographic Extent of Effect

98 The **ES** (**Volumes 1** and **2**) will identify the geographic extent of the identified effects. At a spatial level, 'site' or 'local' effects are those affecting the site and neighbouring receptors, while effects upon receptors in the LBH, beyond the vicinity of the site and its neighbours, are considered to be at a 'district/ borough' level. Effects affecting Greater London are considered to be at a 'regional' level. There is not considered to be any effects likely above this spatial level associated with the Proposed Development.

Effect Duration

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

Direct and Indirect Effects

100 The ES will identify whether the effect is 'direct' (i.e. resulting without any intervening factors) or 'indirect' or 'secondary' (i.e. not directly caused or resulting from something else).

Effect Significance

101 Following identification of an effect, the effect scale, nature, geographic extent and duration using the above summarised terminology, a clear statement will then be made within the ES as to whether the effect is '**significant**' or 'not significant'. As a general rule, the following applies[41]:

- 'Moderate' or 'major' effects are deemed to be '**significant**';
- 'Minor' effects are considered to be 'not significant', although these may be a matter of local interest; and
- 'Negligible' effects are considered to be 'not significant' and not a matter of local concern.

102 Where mitigation measures are identified to either eliminate or reduce likely significant adverse effects, these will be incorporated into the ES, for example either through the design, or will be translated into enabling works and construction commitments; or operational or managerial standards/ procedures.

103 The ES will then highlight the 'residual' and likely significant effects (those effects which remain following the implementation of suitable mitigation measures) and classify these in accordance with the terminology defined above.

SCOPE SUMMARY

104 Those environmental topics that are considered to *potentially* result in significant effects on the environment, have been scoped into the EIA. Those environmental topics that are considered unlikely to result in significant effects on the environment, have been **'Scoped Out'** of the EIA. The EIA should not be all encompassing, and should be proportionate to include only those environmental aspects which are likely to have significant effects on the environment.

105 To assist the reader, a summary of what is proposed to be 'scoped in' and 'scoped out' of the EIA is provided in Table 6.

106 **Annex A: 'Scoped In' Topic Sheets** provides a topic-by-topic consideration of those topics which could potentially result in significant effects, and includes an explanation of the proposed scope and methodology for each assessment.

107 **Annex B: 'Scoped Out' Topic Sheets** sets out the justification for determining that significant environmental effects are not likely . Where relevant, these topic sheets are supported by early technical assessments and baseline work.

108 It should be noted, for those environmental aspects that are scoped out of the ES, as relevant, stand alone technical reports will be submitted as part of the planning application.

Table 6 EIA Technical Topics

Environmental Topics	'Scoped Into' the EIA ✓ 'Scoped Out' of the EIA ✗		Standalone Reports to Accompany the Planning Application
	Enabling Works and Construction	Completed Development	
Air Quality	✗	✗	**Air Quality Assessment, including an Air Quality Neutral Assessment and a Air Quality Positive Statement.**
Archaeology (Buried Heritage)	✗	✗	**Archaeological Desk Based Assessment**
Climate Change and Greenhouse Gases	✗	✗	**Whole Life Carbon Assessment inc. GLA memos** **Circular Economy Statement inc. GLA memos**

[41] *Where this differs for a technical topic, it will be clearly stated in the individual methodology*

Environmental Topics	'Scoped Into' the EIA ✓ 'Scoped Out' of the EIA ✗		Standalone Reports to Accompany the Planning Application
	Enabling Works and Construction	Completed Development	
			Sustainability Strategy **Energy Strategy inc. overheating** **BREEAM Pre-assessment**
Daylight, Sunlight, Overshadowing and Solar Glare (neighbouring only)	✓ *(qualitative)*	✓	Internal Daylight/ Sunlight Assessment
Light Pollution	✗	✗	-
Ecology and Biodiversity	✗	✗	**Preliminary Ecological Appraisal** **Phase 1 Habitat Survey** **Shadow Habitat Regulations Assessment** **BNG Metric and Statement** **Arboricultural Impact Assessment**
Flood Risk and Water Resources	✗	✗	**Flood Risk Assessment** **Drainage Strategy inc.** **Haringey Drainage Proforma**
Ground Conditions	✗	✗	**Phase I Preliminary Risk Assessment Desk Study**
Human Health	✗	✗	**Health Impact Assessment**
Waste and Materials	✗	✗	**Operational and Construction Waste and Servicing Strategy** **Design and Access Statement** **Circular Economy Statement** **Construction Environmental Management Plan** **Outline Construction Logistics Plan**
Noise and Vibration	✓	✗	**Noise Impact Assessment (Operational)** **Construction Environmental Management Plan**
Project Vulnerability, Major Accidents and Natural Hazards	✗	✗	**Flood Risk Assessment** **Wind Microclimate Assessment**
Socio-Economics	✗	✓	Equalities Impact Assessment Economic Statement
Townscape and Visual Impact Assessment	✓ *(qualitative)*	✓	-
Built Heritage	✗	✗	**Heritage Statement**
Traffic and Movement	✗	✗	**Transport Assessment inc. Active Travel Zone Assessment and Parking Assessment** **Travel Plan** **Outline Construction Logistics Plan** **Waste & Servicing Strategy (Operational & Construction)**
Wind Microclimate	✓ *(qualitative)*	✓	-

PROPOSED STRUCTURE OF THE ES

109 The proposed scope and structure of the ES is as follows:

- **ES Volume 1: Main ES** – a document which forms the main body of the ES, and which comprises of the following non-technical and technical chapters:
  - Chapter 1: Introduction
  - Chapter 2: EIA Methodology
  - Chapter 3: Alternatives and Design Evolution
  - Chapter 4: The Proposed Development
  - Chapter 5: Enabling Works and Construction
  - Chapter 6: Socio-Economics
  - Chapter 7: Noise and Vibration
  - Chapter 8: Daylight, Sunlight, Overshadowing and Solar Glare
  - Chapter 9: Wind Microclimate
  - Chapter 10: Effect Interactions
  - Chapter 11: Likely Significant Effects
  - Chapter 12: Environmental Management, Mitigation and Monitoring
- **ES Volume 2: Townscape and Visual Impact Assessment (TVIA)** – a separate townscape and visual impact assessment document that will be accompanied by a full set of views and verified images, as agreed with LBH as part of this EIA Scoping process.
- **ES Volume 3: Technical Appendices** – comprises background data, technical reports, tables, figures and surveys.
- **ES Non-Technical Summary (NTS)** – this will be a separate document providing a concise description of the Proposed Development, the alternatives considered, any identified mitigation measures and the residual likely significant environmental and socio-economic effects.

REQUEST FOR AN EIA SCOPING OPINION

110 This Scoping Report requests an EIA Scoping Opinion from the LBH pursuant to Regulation 15 of the EIA Regulations.

111 This Scoping Report sets out a comprehensive scope of work based on the experience of the assembled team of specialists and existing knowledge of the site. The LBH and consultees are invited to consider the contents of this report and comment accordingly within the five-week period prescribed by the EIA Regulations.

Annex A: ‘Scoped In’ Topic Sheets

TOPIC SHEET

Socio-Economics

Introduction

1 It is considered that there is the potential for likely significant effects relating to socio-economics and so this topic shall be '**Scoped In**' to the EIA.

2 It is considered that there is not the potential for likely significant effects during the enabling and construction works, and therefore this element shall be '**Scoped Out**' of the EIA.

3 The socio-economic assessment will be undertaken by Trium Environmental Consulting LLP.

4 The ES shall:

- Define the socio-economic baseline conditions;
- Identify relevant socio-economic receptors; and
- Assess:
  - The potential for socio-economic impacts as a result of the completed development;
  - The likely significant socio-economic effects;
  - Any required mitigation or monitoring to address any likely significant adverse socio-economic effects; and
  - The potential for cumulative effects in relation to socio-economics with other agreed upon schemes in the surrounding area.

5 As described later in this topic sheet, construction related effects have been scoped out of requiring assessment, as significant effects are not likely.

Baseline Conditions

Current Baseline Conditions

6 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.

7 A detailed assessment of the existing baseline conditions will be considered as part of the socio-economic assessment. This will include a review of the demographic and socio-economic characteristics of the local population and area surrounding the site, including the availability of relevant local health and other community infrastructure.

8 Current baseline conditions will be considered at several geographic levels, depending on available data, as defined below:

- Site;
- Ward (Tottenham Hale);
- Borough (LBH);
- Region (London); and
- Nation (England).

9 The baseline review will consider available information relating to the site provided by the current owners and derived from publicly available database records. This is likely to include the following sources:

- The Office for National Statistics (ONS) and NOMIS:
  - 2021 Census;
  - Annual Population Survey (APS);
  - Business Register Employment Survey (BRES);
- The Ministry of Housing, Communities and Local Government (MHCLG):
  - 2025 English Indices of Deprivation;
- The Office for Health Improvement and Disparities (OHID):
  - 'Fingertips: Public health data' dashboard.
- The National Health Service (NHS):
  - NHS Digital; and
  - 'General Practice Workforce' dashboard;
- The Department for Education (DfE):
  - 'Get Information about Schools' dashboard; and
- Other relevant LBH, Greater London Authority (GLA) and UK Government data.

10 The most recently published sources will be used wherever possible, with data sources published in 2026 used where available. Where this is not available the next best alternative (i.e. the most up to date) will be used.

Future Baseline Conditions

11 Given the difficulty in accurately predicting future baseline conditions with regards to socio-economics (beyond consideration of cumulative schemes in the locality), this assessment will only consider existing baseline conditions. This conservative approach, or the 'do nothing scenario', assumes that conditions on-site and in the local area will not experience notable enough change within the period of the Proposed Development's construction programme to materially impact the assessment's predicted likely socio-economic effects.

Receptors

12 Socio-economic receptors include:

- The local housing market;
- Local health and community infrastructure and their users, specifically:
  - GP surgeries within a 1.6km walking distance of the site[1];
  - Primary schools within Planning Area 4[2];
  - Secondary schools within the LBH[3];
  - Open and play space within an 800m walking distance of the site[4]; and
  - Community facilities (including community centres, libraries and leisure centres) within 1.6km walking distance of the site[5].
- The LBH economy and labour market.

13 There are no new receptors being introduced within the Proposed Development relevant to the assessment of socio-economics, beyond the inherent consideration of changing capacities for existing community infrastructure

[1] *Note: There is no set guidance regarding acceptable travel distances to GP Surgeries. Therefore, a 1.6km walking distance is used as a reasonable assessment area based on an initial review of the local area to ensure suitable data on these services is presented.*
[2] *LBH (2025). School Place Planning Report 2025.*
[3] *LBH (2025). School Place Planning Report 2025.*
[4] *GLA (2012). Shaping Neighbourhoods: Play and Informal Recreation (Supplementary Planning Guidance).*
[5] *Note: There is no set guidance regarding acceptable travel distances to community facilities. Therefore, a 1.6km walking distance is used as a reasonable assessment area based on an initial review of the local area to ensure suitable data on these services is presented.*

due to a change in the local population and the availability of community infrastructure for new residents. The effects on introduced receptors will therefore not be explicitly assessed.

14 In addition, it is not possible to ascribe specific values or a quantifiable 'scale of sensitivity' to all socio-economic receptors due to their diversity in nature and scale. The assessment will therefore focus on the qualitative sensitivity of each receptor, and on their ability to respond to change created by the Proposed Development.

Potential Effects

Completed Development

15 Based on the existing site conditions and the sensitive receptors outlined above, the Proposed Development is expected to generate a range of socio-economic effects once complete and operational. The assessment will therefore consider the potential for the following likely significant effects:

- Delivery of housing contributing to local housing targets (traditional and shared-living);
- Increased demand for healthcare, education and other community infrastructure as a result of the increase in the residential population, with consideration of the social infrastructure proposed as part of the Proposed Development, specifically demand for:
  - GP surgeries;
  - Primary schools;
  - Secondary schools;
  - Open and play space; and
  - Community facilities.
- Generation of employment on-site; and
- Expenditure by residents of the Proposed Development and employees on-site.

Methodology

Completed Development

16 The socio-economic assessment will, wherever possible, be appraised against relevant national standards such as those provided by Homes England, which replaced the Homes and Community Agency (HCA) in January 2018. Where no standards exist, professional experience and judgement will be applied and justified.

17 The assessment of socio-economic impacts will utilise a number of methodologies, data sources and assumptions. These are set out below:

- Delivery of **housing** will be assessed against borough-specific housing targets set out in the London Plan[6], in the context of recent housing delivery performance in the LBH and minimum affordable housing requirements. In accordance with London Plan Policy H1 'Increasing housing supply'[7], the contribution of shared living accommodation to housing targets would be assessed at a 1.8:1 ratio (with 1.8 shared living units counting as a single home);
- The potential demand for **social infrastructure** generated by traditional residential units will be estimated using the GLA Population Yield Calculator v3.2[8], applied to the proposed residential unit mix and the site's Public Transport Accessibility Level (PTAL) rating. The demand associated with shared living units will be estimated on the basis that each unit will accommodate one single, working-age occupant;
  - Demand for **GP services** arising from the total population of the Proposed Development will be assessed against the baseline in line with the Healthy Urban Development Unit (HUDU) benchmark of 1,800 registered patients per NHS GP;
  - Demand for state-funded **primary and secondary schools** arising from the school-aged population of the Proposed Development will be assessed against the baseline in line with Audit Commission guidelines[9] recommending that spare capacity within existing schools be based on 95% of the total number of available school places, to accommodate the potential for students joining mid-year and unforeseen staffing changes;
  - The availability of **open space** will be assessed qualitatively based on the total population of the Proposed Development and the presence of open space within an 800m walking distance as specified in the GLA's Shaping Neighbourhoods: Play and Informal Recreation SPG;
  - **Play space** requirements will be calculated using the GLA's Population Yield Calculator 2019 (v3.2)[10], in line with the GLA's SPG on Play and Informal Recreation benchmark of 10m^2 of dedicated play space per child, with reference to the different criteria for distance to play space by age group (0-4 years, 5-11 years and 12 years and older); and
  - Demand for **community facilities** will be assessed qualitatively based on the location and availability of these facilities.
- The impact of **residents' additional spending** generated by will be calculated by applying an average £459.90 weekly expenditure per household, based on London thresholds set out in the ONS Family Spending Survey[11].

18 The assessment will conclude with a summary of the likely significant residual socio-economic effects.

Cumulative Effects

19 Consideration will be given to the potential for cumulative effects associated with the Proposed Development and other relevant surrounding development schemes identified in **Annex C** (based on publicly available information). The cumulative assessment will consider surrounding housing-led and mixed-use developments that would introduce additional residential populations, together with schemes providing social infrastructure that would support future residents of the Proposed Development. The assessment will focus on the receptors identified above and will be undertaken in line with the above methodology.

20 Where necessary and if information is available at the time of assessments, an additional cumulative scenario will be undertaken (qualitatively) considering the broad uses and quantum's that could come forward on the Cannon Factory site however, this will be reviewed and depending on the level of information available at the time.

Mitigation Measures

21 Following the assessment, any required mitigation shall be identified, with residual effects of the Proposed Development defined based on consideration for whether any further impacts are likely to occur following reasonable implementation of this mitigation.

Potential Effects Proposed to be Scoped Out

Enabling Works and Construction

22 The local construction workforce is large (supporting approximately 280,000 jobs in the construction sector across London[12]) and tends to be very mobile, travelling to wherever work is based. In addition, employment generated during this phase will be temporary in nature. Within this context, the impact of increased demand for construction workers is likely to be felt at the regional rather than the local level and, at this geographical scale, construction employment and associated spending effects are expected to have a beneficial but ultimately not significant impact. An assessment of socio-economic effects relating to the generation of employment during this phase is therefore proposed to be 'Scoped Out'.

Completed Development

23 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 500m^2 of flexible ancillary nursery, commercial/employment and community

[6] *Mayor of London (2021). The London Plan: The Spatial Development Strategy for Greater London.*
[7] *GLA (2021). The London Plan: The Spatial Development Strategy for Greater London. Policy H1 'Increasing housing supply'. Paragraph 4.1.9.*
[8] *GLA (2019). GLA Population Yield Calculator (v3.2).*
[9] *Audit Commission for Local Authorities and the National Health Service in England and Wales (1996). Trading Places: The Supply and Allocation of School Places.*
[10] *GLA (2019). GLA population Yield Calculator.*
[11] *ONS (2024). Family Spending (FYE 2023 edition). Workbook 3 – Expenditure by Region. Table A33 – High level expenditure by region (3-year average).*
[12] *NOMIS (2025). Labour Market Profile – London. Labour Demand.*

floorspace on a site that currently generates no employment. Based on standard employment density metrics[13], this is anticipated to generate up to 50 Full-Time Equivalent (FTE) jobs under a highest-density scenario. Given the scale of the LBH workforce (97,000 jobs), this is expected to give rise to a beneficial but not significant effect. Furthermore, any associated indirect or induced economic benefits, including local supply chain expenditure and day-to-day spending by employees, would be limited and highly localised in the context of the wider LBH economy (annual Gross Value Added (GVA) of £4.8 billion). As neither the employment generation nor the associated economic activity is expected to result in significant socio-economic effects, these elements are proposed to be 'Scoped Out'.

Conclusion

24 It is considered that the Proposed Development could potentially give rise to significant socio-economic effects and so this topic shall be '**Scoped In**' to the EIA. However, it is also considered that there is not the potential for likely significant effects during the enabling and construction works, and therefore this element shall be '**Scoped Out**' of the EIA. In addition, given employment generation and the associated economic activity once the Proposed Development is complete and operational are not expected to result in significant socio-economic effects, these elements are also proposed to be '**Scoped Out**'.

[13] *HCA (2015). Employment Density Guide 3rd Edition.*

TOPIC SHEET

Noise and Vibration

Introduction

1 There is the potential for likely significant effects arising from the enabling works and construction of the Proposed Development relating to noise and vibration. It is therefore proposed that this topic shall be '**Scoped In**' to the EIA on the basis of enabling works and construction noise and vibration effects only.

2 Significant effects relating to operational effects associated with noise and vibration are unlikely. As such these elements will not be included in the EIA, and instead included in a standalone planning Noise and Vibration Impact Assessment report.

3 The Noise and Vibration Impact Assessment will be undertaken by Trium Environmental Consulting LLP.

4 The ES shall:

- Define the noise and vibration baseline conditions;
- Identify relevant noise and vibration receptors;
- Assess:
  - The potential for noise and vibration impacts throughout the enabling works and construction and resultant noise and vibration effects;
  - The likely significant noise and vibration effects;
  - Any mitigation or monitoring requirements; and
- The potential for cumulative effects in relation to enabling works and construction noise and vibration with other agreed upon schemes in the surrounding area.

Baseline Conditions

5 The site is bounded to the north by Rosa Luxemburg Apartments and associated car park and service area, to the east by Ashley Road, to the south by residential properties on Hale Road and to the west by Down Lane Park. Farther to the east (approximately 130m) are grouped railway lines which include the Greater Anglia Lea Valley Lines, Stansted Express, and lines approaching the Northumberland Park Depot. Tottenham Hale station (Network Rail and London Underground Victoria Line services) is located approximately 135m to the southeast of the site. An underground tunnel that is used by Victoria Line trains (The Northumberland Park Spur) is aligned approximately 30m to the southeast of the site.

6 Based on a desktop review, likely noise sources affecting the site will include road traffic noise from Ashley Road, Park View Road and Hale Road. The operation of the adjacent public house/bar (Mother Kelly's Tottenham) may also include significant noise emissions during the evening and early evening.

7 The baseline noise and vibration environment at the site will be determined through unattended noise and vibration monitoring over a period of 5-7 days. Attended short term monitoring may be used to supplement the unattended monitoring.

8 The baseline noise measurements collected in the survey will be used to quantify the existing background sound levels at surrounding receptors and the incident sound levels on future introduced receptors brought forward as

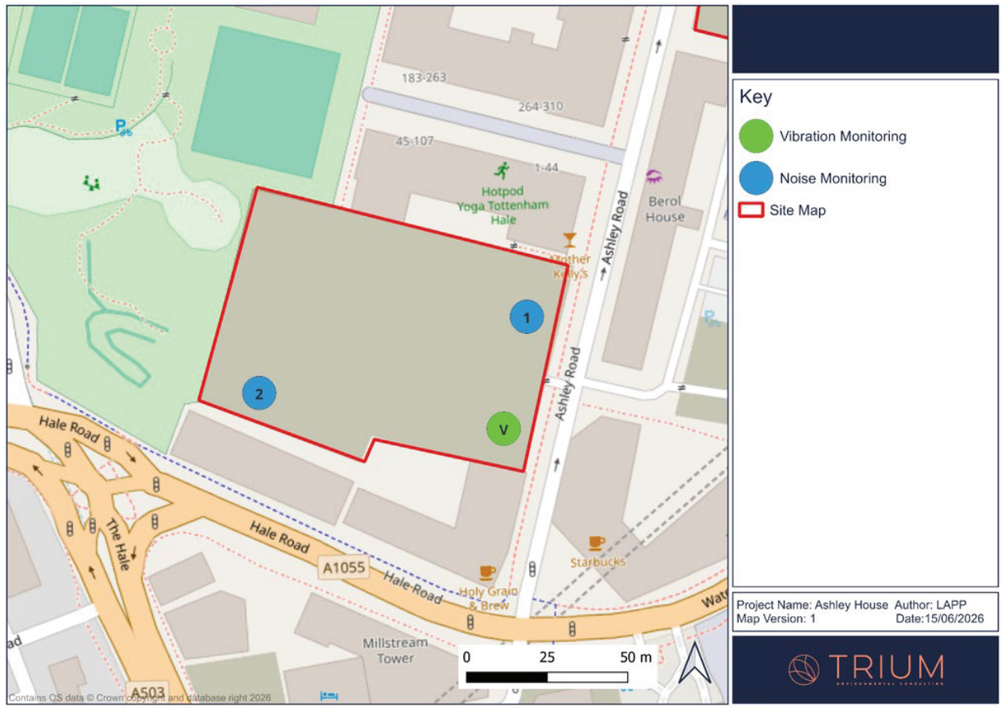
part of the Proposed Development. The noise measurements will be undertaken in line with suitable guidance including British Standards 7445-1[1] and 4142[2].

9 The baseline noise measurements will consist of 1/3 octave bands for key parameters such as L_{Aeq}, L_{A90}, L_{A10} and L_{AFmax}.

10 Vibration measurements will also be undertaken due to the proximity of railway lines to the Proposed Development. Vibration Dose Values (VDV) will be measured through a combination of unattended and attended measurements positioned to capture vibration levels arising from the nearby railway infrastructure. Vibration measurements will be undertaken in line with suitable guidance including British Standard 6472[3].

11 Figure 1 presents potential noise and vibration monitoring positions to be used for the survey.

Figure 1 Potential Noise and Vibration Monitoring Positions



12 A summary of the measured ambient sound and vibration levels will be provided in the Noise and Vibration ES chapter.

Sensitive Receptors

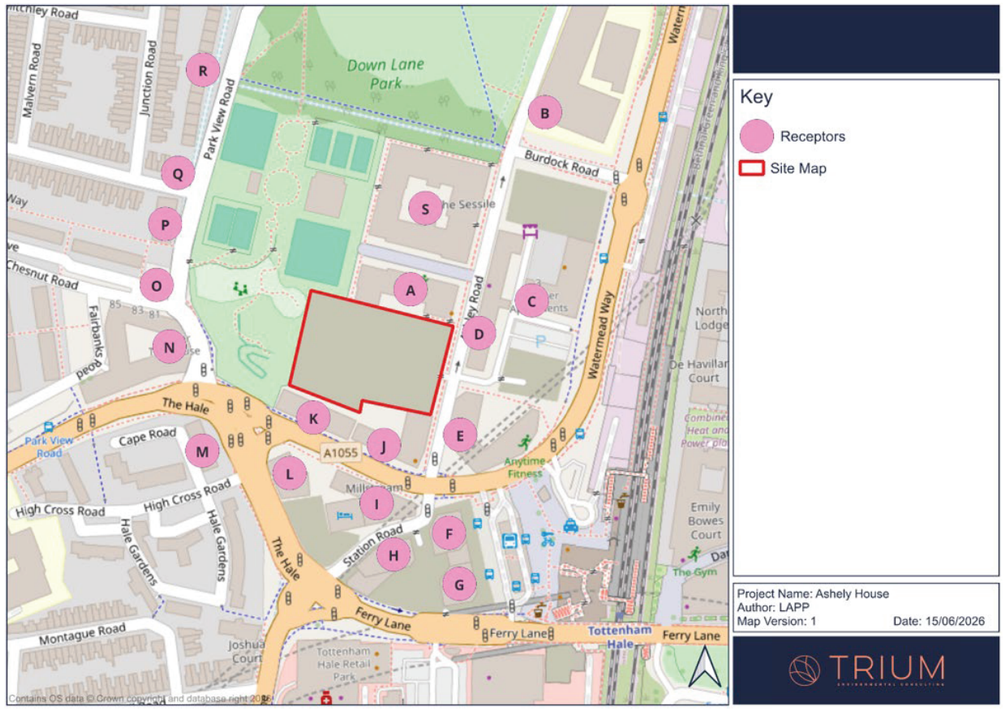
13 The noise and vibration assessment within the ES chapter will consider the following surrounding sensitive receptors, based on a desktop review of the area. Figure 2 below presents the following receptors and their location in relation to the site. The letters presented in Figure 2 correspond to the following receptors:

- A. Residential – Rosa Luxemburg Apartments;
- B. Educational – Harris Academy Tottenham;
- C. Residential – The Gessner (Apartment building);
- D. Commercial – Berol House;
- E. Residential – 2 Ashley Road (East Apartments);
- F. Residential – 2 Ashley Road (Ferry Island Building 1 North Tower);
- G. Residential – 2 Ashley Road (Ferry Island Building 1 South Tower);
- H. Residential – 2 Ashley Road (Ferry Island Building 2);
- I. Hotel – - Premier Inn Tottenham Hale (Hotel);
- J. Residential – 2 Ashley Road (West Apartments);
- K. Residential – 1-21 Hale Road (Residential)[4];
- L. Residential – 2 Ashley Road (North Island Tower);
- M. Residential – Residential apartments along High Cross Road;
- N. Residential – Walter Tull House;
- O. Public House with Residential – The Volunteer (Public House);
- P. Residential – 1-7B Park View;
- Q. Residential – 57-67 Sales Road;
- R. Residential – 8-34 Park View Road; and
- S. Residential – The Sessile Apartments (Apartment building).

[1] *British Standards (BS) 7445:2003 Description and measurement of environmental noise, December 2003.*
[2] *British Standards (BS) 4142:2014: +A1:2019 Method for rating and assessing industrial and commercial sound, October 2014.*
[3] *British Standards (BS) 6472-1:2008 Guide to evaluation of human exposure to vibration in buildings – Vibration sources other than blasting, June 2008.*

[4] *It is understood that there some properties along Hale Road are either privately owned, owned by LB Haringey and rented out, or vacant and subject to future redevelopment plans. The assessment will treat those properties occupied as being highly sensitive receptors. Given the existing baseline condition of the vacant nature of the remaining properties, and our understanding that these properties are unlikely to become occupied due to future redevelopment plans, an assessment of these properties will be undertaken however, will form a separate assessment located within the appendix to the ES chapter. Whilst these properties will be treated with the same sensitivity, it is not considered appropriate to consider the increased levels of noise and vibration to the vacant dwellings in the main body of the assessment and ES chapter. It is however, noted necessary and appropriate to acknowledge these properties given the possibility of them becoming occupied in the future.*

Figure 2 Noise and Vibration Sensitive Receptors



14 Where the assessment identifies the potential for likely significant effects to occur beyond these receptors, the study area will be extended as necessary and additional receptors will be considered.

15 Whilst the development is unlikely to be phased, should residential receptors be introduced as part of any earlier phases, these will be considered as sensitive receptors as the scheme progresses, i.e. the potential impact of noise on the future occupants of the buildings.

16 Receptor sensitivity will be defined based on a mixture of professional experience and industry standards[5,6]. Typically, residential properties, hotels and hostels are considered high sensitivity and educational and healthcare buildings are considered to be of medium sensitivity. Retail, industrial and commercial buildings are generally considered to be low sensitivity. However, all receptors will be individually reviewed and the sensitivity defined as part of the ES chapter. These are summarised below within Table 1.

Table 1 Sensitivity of Receptor Sensitivity (Typical)

Sensitivity of Receptor	Description / Example
High	Residential, hotels, hostels
Medium	Health care (e.g. doctor's surgery, dentist etc), educational buildings (including day care centre)
Low	Commercial offices, industrial units, retail buildings

Potential Effects

Enabling Works and Construction

17 The effects to be assessed within the ES relate to noise and vibration from construction activities taking place on-site, as well as noise effects arising from HGVs accessing and egressing the construction site.

[5] *Institute of Environmental Management and Assessment (IEMA) and Institute of Acoustics (IOA) Guidelines for Noise Impact Assessment, October 2014.*
[6] *British Standard (BS) 8233:2014 – Guidance on sound insulation and noise reduction for buildings, February 2014.*

Completed Development

18 As referred to above, and set out in more detail below, operational effects have been scoped out of this assessment, as significant effects are not likely. An operational stage Noise Impact Assessment will be submitted alongside the planning application.

Methodology

19 The scope of the noise and vibration assessment will:

- Identify the potentially sensitive noise and vibration receptors on and surrounding the site; and
- Identify whether the overall effect of the noise and vibration exposure generated by the enabling works and construction relating to the Proposed Development is, or would be, above or below the significant observed adverse effect level (SOAEL) and the lowest observed adverse effect level (LOAEL). The scale of effects will refer to guidance within the Noise Policy Statement for England (NSPE)[7].

20 The magnitude of impact shall be defined in accordance with recognised noise vibration guidance, as referenced in the following sections, and corresponding EIA terminology – High, Medium, Low and Very Low.

21 The relationship between the magnitude of impact and the receptor sensitivities is determined by the scale evaluation matrix shown in Table 2.

Table 2 Scale Evaluation Matrix

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

22 The nature of effects will be defined as either adverse, beneficial or neutral.

23 The scale of effects will refer to guidance within the NPSE, the decision making includes identifying whether the overall effect of the noise exposure generated by a development is, or would be, above or below the significant observed adverse effect level, and the lowest observed adverse effect level. The definitions for the different effect levels are outlined below:

- Significant Observed Adverse Effect Level (SOAEL): The level of noise exposure above which significant adverse effects on health and quality of life occur;
- Lowest Observed Adverse Effect Level (LOAEL): The level of noise exposure above which adverse effects on health and quality of life can be detected; and
- No Observed Effect Level (NOEL): The level of noise exposure below which no effect at all on health or quality of life can be detected.

24 Typically, effects (either before or after mitigation) that are Major or Moderate in scale shall be considered as 'significant effects' i.e. exceeds the SOAEL.

25 Estimation of noise and vibration generated (impact magnitude) will be undertaken of each principal phase / time slice of the enabling works and construction. An assessment of the likely effects on surrounding sensitive receptors will be presented pre-mitigation. The assessment will be based on methodology set out in British Standard BS 5228-1[8] and BS 5228-2[9], as interpreted within Table 3.

[7] *Department for Environment, Food and Rural Affairs, Noise Policy Statement for England (NPSE), March 2010.*
[8] *British Standards (BS) 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction sites – Part 1: Noise, February 2014.*
[9] *British Standards (BS) 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction sites – Part 2: Vibration, February 2014.*

Table 3 Description of the Magnitude of Impact Rating for Assessing the Likely and Residual Effects of Enabling Works and Construction Noise and Vibration

Magnitude of Impact	Noise Levels	Vibration Levels
Very low	Below existing baseline noise conditions	Peak particle velocity (PPV) less than 0.3mm/s
Low	Above or equal to existing baseline and below 'ABC' threshold	PPV regularly exceeding 0.3mm/s, but less than 1.0mm/s.
Medium	Above or equal to 'ABC' threshold and below 'ABC' threshold +5dB	PPV regularly exceeding 1.0mm/s, but less than 10.0mm/s.
High	Above or equal to 'ABC' threshold +5dB	PPV regularly exceeding 10.0mm/s.

26 In addition to noise from construction activity, Heavy Goods Vehicles (HGVs) and other delivery vehicles will be accessing the site throughout the enabling works and construction programme.

27 The noise impact of the construction-related traffic travelling along the surrounding roads will be calculated using the methodology within Calculation of Road Traffic Noise (CRTN)[10]. The predicted change in road traffic noise with and without the construction vehicles is assessed against criteria listed in the Design Manual for Roads and Bridges (DMRB)[11] for assessment of short-term road traffic noise impacts.

Cumulative Effects

28 The cumulative impacts associated with the Proposed Development and other proposed schemes (i.e., cumulative schemes) within the locality will be established and assessed in relation to construction noise and vibration impacts only.

29 Where necessary and if information is available at the time of assessments, an additional cumulative scenario will be undertaken (qualitatively) considering the anticipated construction relating activities using the broad massing principles potentially coming forward on the Cannon Factory site however, this will be reviewed and depending on the level of information available at the time.

Mitigation Measures

Enabling Works and Construction Noise and Vibration

30 Noise and vibration arising from enabling works and construction shall be minimised by ensuring trade contractors would at all times apply the principle of Best Practicable Means as defined in Section 72 of the Control of Pollution Act[12] and carry out all work in such a manner as to reduce any disturbance from noise and vibration to a minimum.

31 The following provisions are examples (though not exhaustive) of BPM and will be adhered to where practicable throughout the enabling works and construction programme:

- The production of a construction noise and vibration report that evaluates the construction activities and provides specific BPM to reduce noise and vibration;
- Limiting high impact activities (e.g., breaking and piling) to specific times during the day where feasible;
- Plant is to be properly maintained and operated in accordance with manufacturer's recommendations. Electrically powered plant is preferred, where practicable, to mechanically powered alternatives; and
- Where feasible, all stationary plant would be located so that the noise effect at all occupied residential and commercial properties is minimised and, if practicable, every item of static plant when in operation is to be sound attenuated using methods based on the guidance and advice given in BS 5228.

32 The mitigation measures identified will be secured by the implementation of a Construction Environmental Management Plan (CEMP) which would be secured via planning conditions (if consented). These measures will be summarised as part of the ES chapter.

[10] *Department of Transport / Welsh Office Memorandum, 1998: "Calculation of road traffic noise" (CRTN).*
[11] *The Highways Agency: "Design manual for roads and bridges".*
[12] *Control of the Pollution Act 1974 (COPA).*

Potential Effects Proposed to be Scoped Out

Operational Traffic

33 Any changes in road traffic arising from the Proposed Development are expected to be minimal and would not give rise to significant effects, as demonstrated within the traffic and movement topic sheet of this EIA Scoping Report. Traffic flows associated with the Proposed Development will however be reviewed as part of the standalone Noise and Vibration Impact Assessment report, and any adverse effects and associated mitigation measures highlighted therein.

Building Services Plant Noise

34 The noise produced by building services plant must be controlled to achieve acceptable levels of environmental noise at the surrounding noise-sensitive receptors.

35 At this stage, the assessment is based upon setting noise limits that future plant selections will need to adhere to.

36 Noise from the building services plant will be designed to achieve limiting rating noise levels in line with LBH requirements and the guidance set out within BS 4142. The need to achieve these limits can be enforced through the use of a suitably worded planning condition attached to any decision notice for the Proposed Development.

37 Proposed limits for the rating noise level of new building services plant will be set out in standalone report. The limits are based upon the background sound levels defined as part of the baseline conditions for the site and apply at all sensitive receptors identified in Figure 2.

38 On the basis that future fixed plant will be designed to achieve the proposed daytime and night-time limits, there is expected to be no significant effects.

Non-Commercial Uses

39 The Proposed Development may include non-residential use (Class E and F2, or similar) frontage on the ground floor. Usual measures (i.e. tenancy agreements) will inherently limit the noise generated within any tenancy, which in combination with the façade sound insulation will sufficiently restrict environmental noise emissions. The operation of proposed commercial or other non-residential uses will be reviewed in more detail in the standalone Noise and Vibration Impact Assessment report, with any mitigation measures required to achieve suitable residential conditions for the Proposed Development highlighted therein.

Site Suitability

40 Site Suitability assessments considering noise will be completed to demonstrate that with acoustic specific design measures, the Proposed Development can achieve acoustic conditions required for proposed residential uses.

41 Initial vibration and groundborne noise assessments will also be prepared to outline any likely requirements (or not) for isolating buildings. These assessments will be included in the standalone Noise and Vibration Impact Assessment report. Detailed design advice (e.g., how the Proposed Development would be isolated), would be outlined based on the results, whether mitigation would be needed or not.

Conclusion

42 Noise and vibration arising during the enabling works and construction associated with the Proposed Development, including noise associated with construction vehicles, has the potential to result in significant environmental effects at nearby sensitive receptors. Noise and vibration is therefore proposed to be '**Scoped In**' to the EIA, for the enabling works and construction only. The ES chapter will assess the likely noise and vibration effects arising from the principal phases of the enabling works and construction programme, including construction traffic where relevant, and identify any mitigation measures required to reduce adverse effects where practicable. The assessment will include an environmental noise and vibration survey of the site and its surrounding noise and vibration sources.

43 Operational noise and vibration effects associated with road traffic, fixed building services plant, and non-residential uses are not anticipated to result in significant environmental effects. These elements are therefore proposed to be '**Scoped Out**' of the EIA.

44 A standalone Noise and Vibration Impact Assessment will be prepared in support of the planning application. This assessment will consider operational noise and vibration effects in greater detail and establish appropriate mitigation requirements where necessary.

45 The standalone Noise and Vibration Impact Assessment will also demonstrate the suitability of the Proposed Development from an acoustic perspective.

TRIUM

TOPIC SHEET

Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution

Introduction

1 It is considered that there is the potential for likely significant effects relating to daylight and sunlight (DS), overshadowing (O) and solar glare (SG) and so this topic shall be '**Scoped In**' to the EIA.

2 Following review of the baseline conditions at the site and surrounding area the topic of light pollution (LP) from commercial uses or other sources of artificial light is proposed to be '**Scoped Out**' of the EIA.

3 Internal daylight and sunlight to the new residential units and overshadowing to the new open space associated with the Proposed Development will be assessed separately and presented as a standalone planning application document. Therefore, internal amenity shall be '**Scoped Out**' of the EIA.

4 The daylight, sunlight, overshadowing and solar glare assessment will be carried out by eb7.

5 The ES will:

- Defining the daylight, sunlight, overshadowing and solar glare baseline conditions.
- Identify relevant daylight, sunlight, overshadowing, and solar glare receptors.
- Assess:
  - The potential for daylight, sunlight, overshadowing and solar glare impacts throughout the enabling works and construction, and as a result of the completed development, and resultant daylight, sunlight, overshadowing, and solar glare effects.
  - the likely significant daylight, sunlight, overshadowing, and solar glare effects.
  - any required mitigation or monitoring to address any likely significant adverse daylight, sunlight, overshadowing, and solar glare effects; and
  - the potential for cumulative effects in relation to daylight, sunlight, overshadowing, and solar glare with other agreed upon schemes in the surrounding area.

Baseline Conditions

Current Baseline Conditions

6 The existing baseline conditions comprise of a vacant and cleared site following the demolition of low-storey commercial buildings which previously resided on-site.

7 Neighbouring land uses surrounding the site are predominantly residential. Buildings to the north, south, and southeast comprise medium to high rise residential flat blocks, whilst low-rise terraced properties are located to the southwest along Hale Road. To the east of the site, across Ashley Road, there is a three-storey commercial warehouse building.

8 BRE Guidelines state that residential buildings are recognised as having a reasonable expectation to daylight and sunlight, given their permanent occupancy. As such, the baseline considers the existing daylight and sunlight conditions at neighbouring residential properties situated adjacent to the site, with the potential to be affected by the Proposed Development.

9 There is public outdoor amenity spaces located to the west and northwest of the Proposed Development with residential rear gardens located to the south which have the potential to be overshadowed by the Proposed Development and so are considered sensitive. There are photovoltaic solar panels located on the roofs of 2 Ashley Road (East Apartments) to the southeast, Rosa Luxemburg and Sessile Apartments to the north, as well

as The Gessner to the east which are sensitive to potential overshadowing. Therefore, these will be considered in the baseline condition.

10 The site is surrounded by a number of roads, traffic junctions and in relatively close proximity to Tottenham Hale Rail Station which has railway tracks which would have a view of the Proposed Development and as such, could be sensitive to potential solar glare caused by the Proposed Development.

11 Measured surveys of the existing site and surrounding buildings will be undertaken to gather accurate information of site and surrounding context. This will be used to build the test environment used within the daylight, sunlight and overshadowing assessments.

12 To determine the existing baseline conditions, the daylight and sunlight levels within each of the relevant existing sensitive receptors will be defined using the Vertical Sky Component (VSC), No-Skyline (NSL) and Annual Probable Sunlight Hours (APSH) methods, in line with the BRE Guidelines, the regional and local planning policies.

13 Given the clear nature of the existing site, the surrounding buildings currently receive relatively high levels of daylight and sunlight for an urban area.

14 Solar glare is not a comparative assessment; the fact that an effect may occur in the baseline does not necessarily justify occurrence as a result of the Proposed Development. Consequently, the assessment will consider the effect of the Proposed Development in absolute terms, and a baseline assessment is not undertaken but a qualitative description will be provided in the ES. As there are no buildings, it is assumed existing levels of glare are low.

15 Full details on the current baseline conditions will be described in the Daylight, Sunlight, Overshadowing and Solar Glare (DSOSG) chapter of the ES.

16 With regards to the relevant existing surrounding outdoor amenity areas such as Down Lane Park, the Transient Overshadowing and Sun Hours on Ground (where relevant) methodologies will be used to determine the overshadowing baseline conditions.

17 Solar glare is not a comparative assessment and considers the effects of the Proposed Development in isolation. This topic is therefore not assessed in the baseline scenario.

Future Baseline Conditions

18 The future baseline assessment will consider the surrounding environment whereby the Proposed Development is not implemented, and approved developments which are under construction and realistically likely to be built out and occupied ahead of the Proposed Development, in order to test the impact of the Proposed Development upon future consented neighbours. Any relevant schemes will be assessed as part of a future baseline condition, if necessary.

Receptors

19 Following a desk-top review of the site and surrounding context, the following receptors have been highlighted as sensitive and will require the relevant assessment.

Daylight and Sunlight

20 As per the BRE Guidelines, occupants of residential properties have a reasonable expectation of daylight and sunlight, specifically within rooms where daylight is required including living rooms, kitchens and bedrooms. Therefore, these habitable rooms within the study area will be assessed in relation to daylight and sunlight. See Figure 1 below for the study are relating to daylight and sunlight impacts.

Figure 1 Daylight and Sunlight Study Area [1]



21 The following existing residential buildings have been identified as sensitive and therefore relevant for assessment:

- Walter Tull House (1);
- 164 and 181-195 High Cross Road, N17 (2);
- 1-21 Hale Road (odds) (3-13)[2];
- 2 Ashley Road (West Apartments) (14);
- Millstream Tower (15);

[1] *Indicative site boundary shown.*

[2] *It is understood that there some properties along Hale Road which are either privately owned, owned by LBH and rented out, or vacant and subject to future redevelopment plans. The assessment will treat those properties occupied as being highly sensitive receptors. Given the existing baseline condition of the vacant nature of the remaining properties, and our understanding that these properties are unlikely to become occupied due to future redevelopment plans, an assessment of these properties will be undertaken however, will form a separate assessment located within the appendix to the ES chapter. Whilst these properties will be treated with the same sensitivity, it is not considered appropriate to consider the reductions in daylight, sunlight and overshadowing to the vacant dwellings in the main body of the assessment and ES chapter. It is however, noted necessary and appropriate to acknowledge these properties given the possibility of them becoming occupied in the future.*

- 2 Ashley Road (Ferry Island) (16);
- 2 Ashley Road (East Apartments) (17);
- Ferry Island North Apartments (18);
- Rosa Luxemburg Apartments (19);
- Sessile Apartments (20);
- 7 Park View Road (21);
- 6 Park View Road (22);
- 5 Park View Road (23);
- 4 Park View Road (24);
- 3 Park View Road (25);
- 2 Park View Road (26);
- 1 Park View Road (27);
- 1B Park View Road (28);
- 1A Park View Road (29);
- The Volunteer, 131 Chesnut Road (30); and
- The Gessner Apartments (31).

Overshadowing

22 The following existing public and private outdoor amenity areas and photovoltaic solar panels will be considered as part of the overshadowing assessments, Figure 2 below shows the locations of these spaces, and have been listed below for reference:

- Solar panels located on The Gessner (1);
- Shared amenity area at The Gessner (2);
- Solar panels located on Sessile Apartments (3);
- Shared amenity area at Sessile Apartments (4);
- Solar panels located on Rosa Luxemburg Apartments (5);
- Shared amenity area at Rosa Luxemburg Apartments (6);
- Solar panels located on 2 Ashley Road (East Apartments) (7);
- Rear Gardens of 1-21 Hale Road (odds)[3] (8);
- Down Lane Park (9); and
- Community Centre Park and associated sport courts (10).

23 The receptors identified above are considered sensitive due to their location and orientation relative to the site. Given the southerly path of the sun, receptors situated entirely to the south of the site are not considered sensitive, as shadows are only cast to the north, east and west. The neighbouring gardens at 1–21 Hale Road (8) have been included within the assessment, as the westernmost gardens are located north of the southernmost section of the red line boundary and could therefore be affected by the Proposed Development. In contrast, the rooftop amenity space at 2 Ashley Road (West Apartments), located to the east of these gardens, lies entirely to the south of the site and is therefore not considered a sensitive receptor.

[3] *As set out above, those properties which are vacant will be included in a separate appendix to the ES chapter.*

Figure 2 Plan View of the Site and Neighbouring Sensitive Overshadowing Receptors[4]



Solar Glare

24 Solar glare is generally only a potential significant problem to motorists approaching traffic lights or signals surrounding the site where there are large areas of reflective glass, particularly sloping glass, which could reflect sunlight and cause solar dazzle.

25 The assessment will consider potentially sensitive viewpoints for road users surrounding the site. The viewpoints are located at the minimum stopping distance and at the driver's eye level with the focal point being a relevant traffic element, such as signals or incoming traffic and pedestrian crossings.

26 The following sensitive viewpoints, highlighted on Figure 3, are considered to be sensitive and therefore will be considered as part of the solar glare assessment:

- Drivers travelling east along Hale Road;
- Drivers travelling east along Chesnut Road;
- Drivers travelling north and south along Ashley Road;
- Train Drivers travelling south along the railway tracks approaching Tottenham Hale Station;

[4] *Indicative site boundary shown.*

- Drivers travelling north along The Hale; and
- Drivers travelling south along Park View Road.

Figure 3 Plan View of the Site and Indicative locations of Solar Glare Viewpoints[5]



Internal New Receptors within the Proposed Development

27 The level of daylight, sunlight and overshadowing amenity within the proposed residential units and amenity areas within the site is considered to be a design issue and therefore will be summarised in the EIA but dealt with in full detail in a standalone report outside of the EIA. The internal assessments would include a detailed assessment of the daylight and sunlight levels within the proposed detailed units, and the overshadowing levels within the proposed amenity spaces.

Potential Effects

Enabling Works and Construction

28 The enabling works and construction phase of the Proposed Development is considered to be less relevant for DSOSG ES chapter, as the Completed Development presents the worst-case assessment, given that the proposed massing will be fully built out to its maximum extents in this scenario. Therefore, a quantitative assessment of the effects associated with the enabling and construction phase is not necessary, as the likely impacts would be the same or less than those described in the Completed Development scenario.

29 A qualitative summary of the likely construction impacts will be provided within the ES chapter to reiterate this point and discuss the evolving position. This will be informed by professional judgement and the results of the Completed Development scenario assessments.

Completed Development

30 The study area for the assessments is considered to be the residential accommodation and amenity areas in the immediate vicinity of the site. The Completed Development scenario has the potential to impact daylight, sunlight, overshadowing and solar glare levels in the surrounding area and therefore needs to be considered quantitatively.

31 The approach and methodologies used for the assessment of daylight, sunlight, overshadowing and solar glare assessments will be in line with those set out by the BRE guidance.

32 The effects to be assessed within the ES are summarised below:

- Loss of natural daylight to adjacent properties;
- Loss of natural sunlight to adjacent properties;
- Overshadowing of public / private external amenity space and solar panels; and
- Instances of solar glare to surrounding traffic junctions and rail lines.

Methodology

Enabling Works and Construction

33 As noted above, the enabling works and construction scenario is not considered relevant for daylight, sunlight, overshadowing and solar glare assessments as this does not present the worst-case scenario. It is proposed that a qualitative summary of the likely effects will be provided within the ES chapter.

Completed Development

34 The assessments will be carried out in accordance with the Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight 2011, A Guide to Good Practice, Second Edition 2022[6] and Institute of Lighting Professionals Guidance Note 1 - The Reduction of Obtrusive Light, 2021 (ILP guidelines)[7]. The analysis will be undertaken with a 3D computer model constructed using specialist software.

Daylight and Sunlight

35 With regard to daylight and sunlight, paragraph 2.2 of the BRE guidelines states that:

"The guidelines given here are intended for use for rooms in adjoining dwellings where daylight is required, including living rooms, kitchens and bedrooms. Windows to bathrooms, toilets, storerooms, circulation areas and garages need not be analysed. "

36 In accordance with this guidance, the sensitive receptors that will be assessed are habitable rooms in residential dwellings, where the occupants have a reasonable expectation of daylight and sunlight. The properties that will be considered within the assessment are detailed above.

37 There is no definition within the BRE guidelines on moderate effects, so these are determined based on professional judgement.

38 The key terminology used to describe the magnitude of impacts are as follows and are determined with reference to the BRE Guidelines criteria:

- Major;
- Moderate;
- Minor; and

[5] *Indicative site boundary shown.*

[6] *British Research Establishment. (2022). Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice*

[7] *Institute of Lighting Professionals (2021). Guidance Note 01/21: The reduction of Intrusive Light.*

- Negligible.

39 The text below sets out how individual VSC and NSL impacts will be determined and defined. These impacts will be reviewed together to determine the overall effect on daylight to the property in question, using professional judgement based on the number of impacts, the magnitude of the impacts.

VSC Criteria

40 The BRE Guidelines recommend that a window serving a habitable room should be able to benefit from a minimum VSC value of 27%.

41 In order to be regarded as meeting the VSC criteria once the Proposed Development has been constructed, a window should either:

- Retain at least 27% VSC in absolute terms; or
- Retain at least 80% of its existing VSC value after the Proposed Development is constructed.

42 A relevant factor when considering the significance of effect is the adequacy of the retained light within the neighbouring dwellings. This is especially relevant in an emerging urban context such as this where the buildings are currently low-rise, but higher density schemes are emerging surrounding the site. The BRE guidelines allow for alternative target values to be considered when applying significance in such situations. Recent appeal decisions indicate that retained VSC levels in the mid-teens would be acceptable in urban environments and levels in excess of 20% would be reasonably good. As such, where there are retained VSC values in excess of 20% the significance of effect would tend towards being minor adverse.

43 Where there will be a noticeable change, the results have been summarised dependant on how far beyond the suggested targets the reductions are from baseline levels. For VSC, based on professional judgment the ranges of reduction have been set at:

- Up to 19.9% (Negligible);
- 20-29.9% (Minor Adverse);
- 30-39.9% (Moderate Adverse); and
- >40% (Major Adverse).

NSL Criteria

44 In order to be regarded as meeting the NSL criteria, an existing room should retain at least 80% of its existing NSL value after the Proposed Development is constructed.

45 Where the results would show compliance with the NSL criteria, the effect is of Negligible significance since the occupants are unlikely to experience any noticeable change to their daylight amenity levels. For the purposes of the assessments, such an effect would be considered Negligible.

46 If there were to be noticeable changes, the results will be summarised dependant on how far beyond the suggested targets the reductions from baseline levels will occur. For NSL, based on professional judgment the ranges of reduction have been set at:

- Up to 19.9% (Negligible);
- 20-29.9% (Minor Adverse);
- 30-39.9% (Moderate Adverse); and
- >40% (Major Adverse).

APSH Assessment

47 The BRE Guidelines for the APSH method state that if a window:

"…can receive more than one quarter of annual probable sunlight hours, including at least 5% of annual probable sunlight hours during the winter months between 21 September and 21 March, then the room should still receive enough sunlight".

48 Accordingly, in order to be regarded as meeting APSH criteria once the Proposed Development has been constructed, a window should either:

- Retain at least 25% total APSH and 5% APSH in the winter months in absolute terms.
- Retain at least 80% of its existing total and winter APSH values after the Proposed Development is constructed; or
- The loss of total absolute annual APSH should be no more than 4% lower than the existing level.

49 If the results show compliance with the BRE Guidelines APSH criteria, the effect is of negligible significance since occupants are unlikely to experience any noticeable change to their sunlight amenity levels.

50 If the assessment demonstrates that sunlight levels would not be above requirements, the results will be assessed on the basis of how far beyond the suggested targets the reductions from baseline levels will occur. For total APSH, based on professional judgment the ranges of reduction have been split into:

- Up to 19.9% (Negligible).
- 20-29.9% (Minor Adverse).
- 30-39.9% (Moderate Adverse); and
- >40% (Major Adverse).

51 In accordance with the guidance, potential impacts on commercial properties which have an expectation to be reliant on artificial light, such as offices, will not be assessed as these are not considered sensitive receptors.

52 To inform the baseline analysis, a digital 3D model of the existing baseline scenario will be constructed. The model will be analysed to ascertain the baseline levels of daylight and sunlight amenity within the surrounding residential properties by reference to the Visible Sky Component (VSC), No Skyline (NSL) and Annual Probable Sunlight Hours (APSH) methods.

53 For the individual and cumulative impact assessments, the 3D model will include the Proposed Development (once completed) and relevant cumulative schemes. Both VSC and NSL assessments of surrounding residential receptors will be undertaken for the individual and cumulative impact assessment scenarios. The results will be analysed in the context of the established baseline conditions. In addition, the effect of the proposal on any receptors within the cumulative schemes will be assessed.

54 For the purposes of the daylight and sunlight assessments, the following scenario will be considered:

- The effects of the Proposed Development on the surrounding receptors.

Overshadowing Effects on Surrounding Receptors

55 The overshadowing assessment will comprise a sun on ground assessment and a transient overshadowing assessment. The receptors sensitive to overshadowing effects are listed above.

56 The method for assessing sun on the ground is the 'sun-on-ground indicator'. The BRE Guidelines suggest that the Spring Equinox (21 March) is a suitable date for the assessment. Using specialist software, the path of the sun is tracked to determine where the sun would reach the ground and where it would not. This assessment reviews the total percentage of an area that receives at least 2 hours of direct sunlight on 21 March. The BRE Guidelines recommend that at least 50% of each amenity area should receive 2 hours of sunlight on 21 March.

57 Where the results show compliance with the BRE Guidelines criteria, the occupants are unlikely to experience any noticeable change to their sunlight amenity levels. For the purposes of this assessment, such an effect would be considered Negligible. Should the relevant criteria not be achieved, a judgment has to be made as to the scale and nature of the effect and thus, the significance of the effect, based on the level of loss, retained sunlight levels and the relevant baseline condition.

58 The BRE Guidelines suggest that where large buildings are proposed which may affect a number of gardens or open spaces, it is useful to plot a shadow plan to illustrate the location of shadows at different times of the day and year. For the purpose of this assessment, the transient overshadowing will be mapped for the following three key dates in the year:

- 21 March (Spring Equinox);
- 21 June (Summer Solstice); and
- 21 December (Winter Solstice).

59 For each of these dates, the overshadowing would be illustrated at hourly intervals throughout the day from 08:00 to 19:00. Some images are not included because the sun will not be present during these times (e.g. from approximately 16:00 onwards on 21 December) and thus no shadow can be cast.

60 The BRE Guidelines do not include criteria for the scale and nature of effects and subsequent significance of transient overshadowing other than to identify the different times of the day and year when shadow would be cast over a surrounding area.

61 The assessment of potential effects as a result of transient overshadowing is therefore based on professional judgement, taking into consideration the overshadowing condition of the existing site and surrounding area, and comparing this against the resultant impact of the Proposed Development.

Solar Glare

62 Road junctions are particularly sensitive in relation to solar glare as instances of reflection may obscure the view of traffic signals or temporarily blind drivers and thus result in accidents. Due to the close proximity of the site to surrounding road junctions, effects on these locations would be considered in the assessment. The common practice for this type of study would be to investigate the location and orientation of traffic signals to identify sensitive viewpoints to be assessed along the main routes.

63 The assessment will identify the time of day and year that solar reflections will be visible from the assessed viewpoints, as well as their relationship to a driver's line of sight. The assessment will not measure the intensity of the reflection but merely the occurrence and duration.

64 Solar glare is not a comparative assessment; the fact it may occur in the baseline does not necessarily justify its occurrence as a result of a Proposed Development. Therefore, the assessment qualitatively considers the effect of the Proposed Development in absolute terms and not against a baseline condition.

65 The following criteria for the scale of effect is therefore used based on professional judgement:

- Negligible: Glare angles greater than 30°, as reflections beyond this angle are normally not intense enough to cause glare (CIE 146:2000), or between 10° and 30° for brief periods of time;
- Minor Adverse: Glare angles between 10° and 30° for long periods of time or between 3° and 10° for a short period of time;
- Moderate Adverse: Glare angles between 3° and 10° for a long period of time; and
- Major Adverse: Solar reflections with glare angles smaller than 3°.

Solar Radiation to Solar Panels

66 The solar radiation assessment calculates the amount of direct solar and diffuse sky radiation received by solar panels with both the existing and Proposed Development in place. The BRE Guidance suggests that where a solar panel receives at least 0.9 times the amount of solar radiation received in the existing scenario, then there would not be a significant impact on the solar panels.

Cumulative Effects

67 A review of the list of cumulative schemes for the application has been undertaken, and the following schemes have the potential to generate cumulative effects to daylight, sunlight and overshadowing:

- 29-33, The Hale, N17 9JZ – planning application reference: HGY/2021/2304; and
- 2 Berol Yard, - planning application reference: HGY/2025/0930.

68 As these cumulative schemes sit in reasonable proximity and are of sensitive uses with the potential to be affected by the Proposed Development, they will be considered within the ES chapter. The methods of cumulative assessments will follow BRE Guidelines (2022).

69 Consideration will also be undertaken in terms of the loss of daylight, sunlight and overshadowing to these two schemes with the Proposed Development completed and built out.

70 Where necessary and if information is available at the time of assessments, an additional cumulative scenario will be undertaken (qualitatively) considering the broad massing principles and quantum's potentially coming forward on the Cannon Factory site however, this will be reviewed and depending on the level of information available at the time.

Mitigation Measures

71 Mitigation measures will be embedded within the design process for daylight, sunlight, overshadowing and solar glare, including design stage analysis on the massing configuration.

Potential Effects Proposed to be Scoped Out

Baseline Conditions

72 Light pollution is not a comparative assessment; the fact that it may occur in the baseline does not necessarily justify its occurrence as a result of the Proposed Development. Consequently, the assessment will consider the effect of the Proposed Development in absolute terms, using professional judgement. However, no high-powered external lighting is proposed as part of the Proposed Development.

73 The majority of the existing site currently sits vacant having previously been home to a commercial light industrial yard and low-storey building. These buildings have since been demolished and the site is vacant. Given this vacant nature there are currently no sources of artificial light on site to contribute to light spillage/pollution to sensitive residential/ ecological receptors.

74 Neighbouring land uses to the immediate north include a high to medium rise residential led development and Down Lane Park to the west and north.

75 The Institution of Lighting Professional (ILP) publication 'Guidance Notes for the Reduction of Obtrusive Light' (GN01:2021) makes recommendations aimed particularly at avoiding nuisance from obtrusive external lighting installations, such as spillage of electric light from office or commercial buildings into residential accommodation and/ or ecological environments where this would cause inconvenience to inhabitants.

Mitigation Measures

76 The Proposed Development is a residential led scheme, and so no high-powered external lighting is proposed.

77 The Proposed Development will include a lighting strategy that will comply with the ILP Guidelines as to not result in significant light spill effects to the neighbouring receptors and park. This will be sought as a planning condition assuming the application is granted permission. The application will be accompanied by a draft lighting strategy, which will be reviewed as part of the EIA.

Conclusion

78 As discussed in the above sections, due to the inclusion of appropriate mitigation measures, significant environmental effects with regards to light spillage / pollution are considered unlikely and will be designed out within a detailed lighting strategy.

TRIUM

TOPIC SHEET

Wind Microclimate

Introduction

1 It is considered that there is the potential for likely significant effects relating to wind microclimate and so this topic shall be '**Scoped In**' to the EIA.

2 The wind microclimate assessment will be carried out by GIA.

3 The ES will:

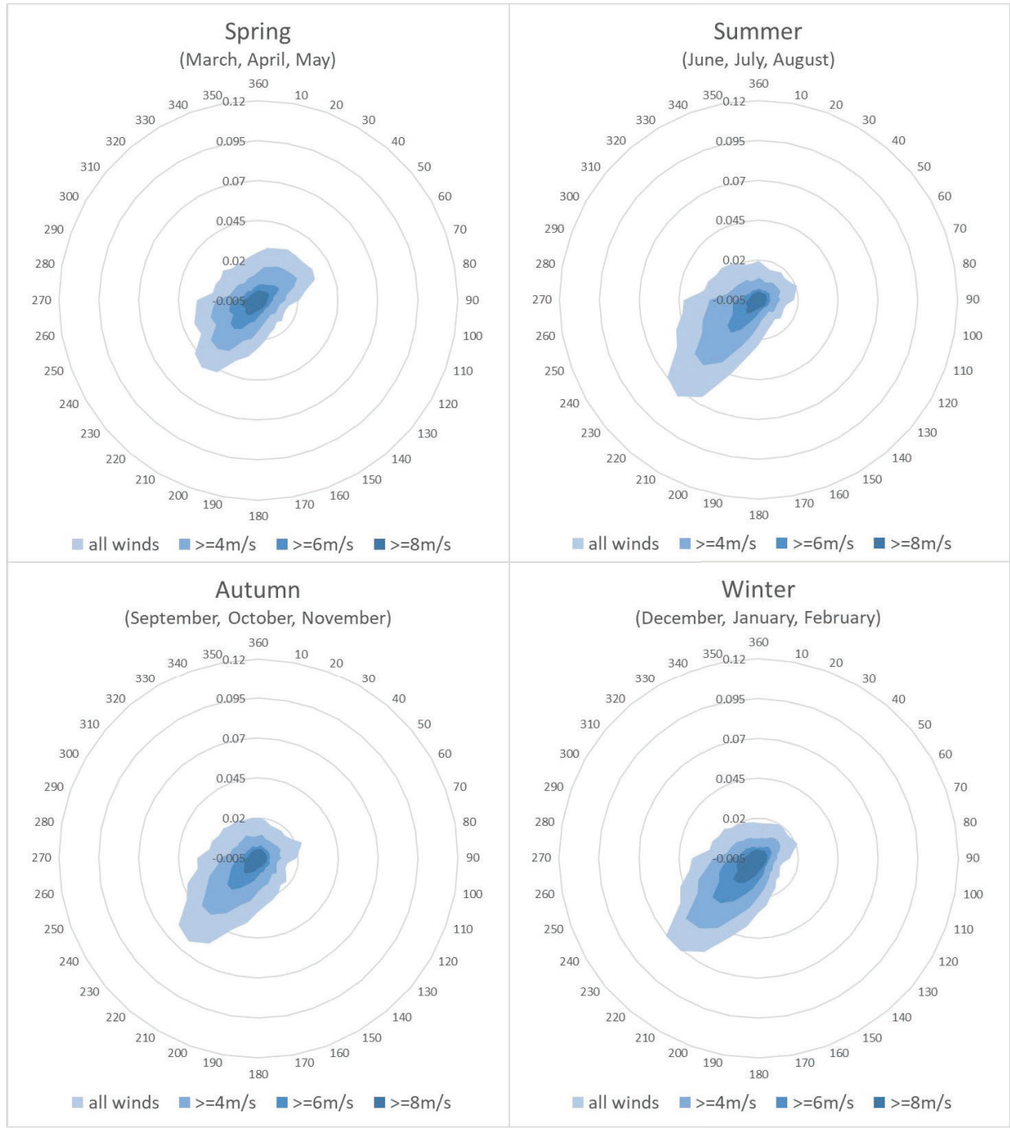
- Define the wind microclimate baseline conditions;
- Identify the wind microclimate receptors;
- Assess:
  - the potential for wind microclimate effects as a result of the completed and operational Proposed Development;
  - the likely significance of any wind microclimate effects;
  - any required mitigation to:
    - avoid significant adverse wind microclimate effects;
    - minimise and reduce any other adverse wind microclimate effects; and
  - the potential for cumulative wind microclimate effects.

Baseline Conditions

Current Baseline Conditions

4 Winds for the Tottenham area are predominantly from the southwest, with a secondary peak from the northeast during spring. Winds are typically stronger in the winter season, and lighter throughout the summer. Wind roses per season are shown in Figure 1, from data attained from data attained from Heathrow and London City airports over a period of approximately 30 years. These wind roses provide the frequency of occurrence and magnitude of winds from all directions within the 30-year period.

Figure 1 **Seasonal Wind Roses for London (Radial axis indicates percentage of the season exceedance of the relevant wind speed)**



5 To understand and quantify the baseline conditions at the site, a full-scale digital model will be constructed reflecting the existing built form of the site and the surrounding area (minimum 400m radius from the centre of the site). This full-scale digital model will be tested in high resolution Computational Fluid Dynamics (CFD) to allow the baseline wind microclimate conditions to be quantified.

6 The baseline results from CFD will be combined with long-term meteorological climate data, corrected to understand the baseline conditions specific to the site, having regard to its location. Testing in CFD will be conducted in the absence of any existing hard or soft landscaping, in order to provide a conservative result.

Receptors

7 The main interactions of wind with a building occurs relatively close to the building, particularly when there are neighbouring buildings and streets along which the wind can be channelled. This means that the focus of the assessment is within the site boundary and the immediate surrounding streets and public realm.

8 The study area comprises the site and its immediate surroundings within a minimum 400m radius from the centre of the site.

9 Key receptors within and around the site are anticipated to include:

- Pedestrian footpaths or 'thoroughfares';
- Entrance locations for buildings (on and off-site);
- Amenity areas (i.e. open space), both on and off-site (i.e. Park View Road park and play area);
- Off-site terraces and balconies of the 2 Ashley Road and 16 Ashley Road Development.
- On-site accessible podium/terrace levels and balconies;
- Bus stops;
- Junctions (pedestrians); and
- Pedestrian crossings.

Potential Effects

10 Undesirable wind speeds can make spaces uncomfortable or unsafe for pedestrian use. The introduction of the Proposed Development's massing on-site will, therefore, have the potential to influence the baseline wind conditions on and surrounding the Proposed Development.

11 The potential wind microclimate effects associated with the Proposed Development are considered to be:

- Undesirable wind speeds in accessible ground and elevated levels of the Proposed Development, surrounding buildings, pedestrian thoroughfares, pedestrian junctions, bus stops and nearby areas of public realm during the enabling works and construction phase; and
- Undesirable wind speeds at accessible ground and elevated levels of the Proposed Development, including entrances, balconies and accessible podium/terrace levels, thoroughfares and amenity spaces, surrounding buildings (including entrances), pedestrian junctions, bus stops and nearby areas of the public realm during the operational phase.

Methodology

12 The assessment of the wind microclimate will be based on the results from a series of tests on full-scale digital models using Computational Fluid Dynamics (CFD) to provide a detailed assessment. The wind microclimate will be benchmarked against the Lawson Comfort Criteria, in order to assess the pedestrian comfort for users of the Proposed Development. CFD is an established and widely accepted methodology for assessing the wind microclimate around tall buildings, and is considered appropriate for this assessment in Haringey. CFD offers particular advantages for schemes of this nature, as it resolves wind conditions across the entire study area rather than at discrete measurement points, allowing pedestrian comfort and safety to be assessed comprehensively at ground level, terraces and amenity spaces in line with the Lawson Comfort Criteria. During design development, CFD testing of the developing massing will be carried out for selected wind angles of concern to examine the anticipated flows and to assist in refining the design.

13 Given the size and geometry of the Proposed Development, in addition to the site's location in relation to surrounding buildings and nearby areas of public realm, it is important to avoid undesirable wind speeds being generated at ground and accessible elevated levels.

14 The wind microclimate assessment will therefore quantify the potential changes to the local wind environment (both on-site and within the surrounding area) in terms of pedestrian amenity and public open space and quantify these in relation to their 'usability' for a range of pedestrian and amenity activities (i.e. thoroughfares, entrances, sitting, etc), as defined by the well-known and established Lawson Comfort Criteria.

15 Comfort thresholds are shown in Table 1 below. If the measured wind conditions exceed the threshold wind speed for more than 5% of the time (whether that is seasonally or annually), then they are unacceptable for the stated pedestrian activity and the expectation is that there may be complaints of nuisance or people will not use the area for its intended purpose.

Table 1 Lawson Comfort Criteria (LDDC Variant)

Key	Comfort Category	Mean Wind Speed (5% exceedance)	Description
	Sitting	0-4m/s	Acceptable for outdoor sitting use (e.g. cafes, benches, balconies)
	Standing	4-6m/s	Acceptable for main building entrances, pick-up / drop-off points and bus stops
	Leisure Walking	6-8m/s	Acceptable for strolling
	Business Walking	8-10m/s	Acceptable for external pavements, walking purposefully without lingering
	Uncomfortable	>10m/s	Not comfortable for regular pedestrian access

16 If strong winds are recorded, then these will also be reported. The activities described above are those used by Lawson Comfort Criteria. The two further categories (business walking and uncomfortable) are often associated with occasional strong winds (in excess of 15 or 20 m/s) and should be mitigated unless there are alternative routes, or they occur on less frequently used routes or in areas inaccessible to the general public.

17 Strong winds are reported for exceedances of 15m/s (to account for less able-bodied people or vulnerable users such as cyclists) and 20 m/s (for able bodied people) for more than 0.025% of the year (or above approximately 2 hours).

Enabling Works and Construction

18 As enabling works and construction progresses, the conditions on and around the Proposed Development site would be expected to gradually transition between those of the baseline and the final completed Proposed Development. A qualitative approach will be taken to the assessment of the enabling works and construction, with limited or no access of the majority of the Proposed Development site and in the immediate vicinity available to pedestrians.

Completed Development

19 To understand the future wind conditions at the site, CFD testing will be carried out to establish wind conditions once the Proposed Development is completed and operational.

20 Four configurations will be tested as set out below:

- Configuration 1: Existing Site (baseline scenario) with the existing surrounding buildings.
- Configuration 2: Proposed Development with the existing surrounding buildings; and
- Configuration 3: Proposed Development with the cumulative surrounding buildings.

Depending on the design development of the Cannon Factory site, a further cumulative configuration may be included, albeit this would be a qualitative assessment (not CFD):

- Configuration 4: Proposed Development with the cumulative surrounding buildings and Cannon Factory (Qualitatively assessed).

21 3D models of the Proposed Development, existing surroundings and nearby cumulative schemes, as appropriate, will be created and tested in high resolution CFD, to allow the future wind microclimate conditions to be quantified. The model will cover a minimum radius of 400m. Mean wind speeds and turbulence levels (to allow the calculation of gust speeds) will be measured at 1.5m above ground level and any raised areas which are accessible to pedestrians, for all wind directions.

22 Based on the results of the CFD testing assessed against the Comfort Thresholds discussed above, the suitability of the conditions and the likely effect at particular locations, both on-site and off-site, will be determined.

23 The adopted scale for the significance criteria is a logical comparison of the measured wind environment with the desired wind environment. An adverse effect implies that a location has a wind environment that is unsuitable for its intended use and mitigation should therefore be considered. A beneficial effect indicates that a location has a wind environment that is considered suitable (or better) for its intended use and, therefore, mitigation is not required.

24 The minor, moderate and major categories indicate the scale of severity with regards to the difference between the desired microclimate and the actual microclimate. As an example, if the desired wind conditions at a particular location are required to be suitable for standing, but the predicted wind conditions are suitable for walking, the difference between the desired and predicted wind condition is one category windier than desired. In this case, the scale and nature of the effect would be identified as minor adverse.

25 Adverse effects that are minor, moderate and major in scale are considered a 'significant' effect in EIA terms, which is material to the planning decision process as it implies that a location, or area, has a wind microclimate that is unsuitable for the desired use of that area. Beneficial effects (at all scales) are considered 'not significant'.

26 Wind effects due to development are usually 'felt' within the Proposed Development site boundary or the immediate surrounding streets and are due to the building massing and orientation. Consequently, all reported effects are considered to be direct, local and long-term unless there is a change in the massing or climate.

27 The potential for strong winds to occur will also be addressed for all the scenarios examined. Strong winds are considered to be significant as soon as the threshold is exceeded, regardless of the magnitude of exceedance.

28 The suitability of the conditions both within the Proposed Development site and surrounding the Proposed Development site, both in terms of comfort and strong winds, will be presented and discussed within the ES, and a supporting technical appendix.

Cumulative Effects

29 The cumulative assessment is undertaken in line with the same methodology as outlined above for Configuration 3. A list of cumulative schemes to be considered is included within **Annex C: Cumulative Schemes** of this EIA Scoping Report.

30 Cumulative schemes within a 400m radius of the centre of the site will be included. Schemes beyond this radius are considered to be too far from the site to result in any cumulative impacts and are therefore excluded from the assessment.

Mitigation Measures

31 Should mitigation measures be required to provide wind conditions within a particular area / space to be suitable for their intended use, or are required to mitigate against predicted strong winds, the areas identified requiring suitable mitigation measures will be developed in consultation with the Applicant and the Design Team. Where necessary, mitigation measures will be tested through additional rounds of CFD studies. Following mitigation, the significance of any residual effects will be classified.

Conclusion

32 It is considered that the Proposed Development could potentially give rise to significant effects with respect to wind microclimate once complete and operational. It is therefore proposed that a wind microclimate assessment is '**Scoped In**' to the EIA.

TRIUM

TOPIC SHEET

Townscape and Visual Impact

Introduction

1 It is considered that there is the potential for likely significant effects relating to townscape and visual impact and so this topic shall be '**Scoped In**' to the EIA. The townscape and visual assessment will be undertaken by Montagu Evans.

2 The ES will:

- Define the townscape and visual baseline conditions;
- Identify relevant townscape and visual receptors;
- Assess:
  - The potential for townscape and visual impacts throughout the enabling works and construction and as a result of the completed development;
  - The likely significant townscape and visual effects;
  - Any required mitigation or monitoring; and
  - The potential for cumulative effects in relation to townscape and visual with other agreed upon schemes in the surrounding area.

Baseline Conditions

Current Baseline Conditions

3 The Ashley House site occupies a prominent plot on the western side of Ashley Road, situated immediately north of Tottenham Hale Station and its associated transport interchange. The site forms part of a wider cluster of development parcels extending along Ashley Road and Station Road, which are currently undergoing phased redevelopment.

4 Further to the east of the site, located beyond Ashley Road and the 2 Ashley Road (East Apartments) is Watermead Way (A1055), a principal thoroughfare running through the area. Beyond Watermead Way are railway corridors associated with the West Anglia Main Line and Tottenham Hale Station, beyond which are recently completed and emerging residential-led developments, including purpose-built student accommodation. Further east lies the River Lee Navigation and associated open space corridors. To the west, the site is directly bounded by Down Lane Park, providing a significant area of public open space comprising formal sports pitches, recreational facilities and landscaped areas. Residential neighbourhoods extend beyond the park.

5 To the south, the urban context comprises of residential-led developments such as the Millstream Tower, as well as local retail provision, community infrastructure and hotel use in the form of the Premier Inn Tottenham Hale. The A503 Ferry Lane runs east–west to the south of the site, linking in with the A1055 and providing strategic connectivity within the wider road network and linking to the A10 corridor. To the north, the character becomes more varied, with a mix of retained industrial plots, redevelopment sites and emerging residential schemes.

6 The site falls within a number of significant strategic planning designations, including

- Upper Lee Valley Opportunity Area;
- Tottenham Hale District Centre;

- Tottenham Area Action Plan; and
- Tottenham Housing Zone.

7 In addition, the site benefits from a highly accessible location, situated approximately 135 metres from Tottenham Hale Station, which provides access to London Underground and National Rail services, as well as an extensive bus interchange. The site has a Public Transport Accessibility Level (PTAL) of between 5 and 6a. This high level of public transport accessibility supports the ongoing intensification of development within the surrounding area and reinforces the Site's suitability for higher-density development.

8 There is an extant planning permission for redevelopment of the site (planning application reference: HGY/2016/4165; HGY/2018/2353), which allows for buildings of up to 16 storeys. The wider Tottenham Hale area has also undergone significant regeneration in recent years, resulting in the delivery of a number of substantial developments reaching significant heights. These include the Hale Village Masterplan (planning application reference: HGY/2006/1177), which introduced residential buildings of up to 21 storeys; the completed 1 Ashley Road development (planning application reference: HGY/2018/2223), comprising buildings of up to 18 storeys; the 2 Ashley Road scheme (planning application reference: HGY/2018/2223), which reaches a maximum height of 14 storeys; and the Hale Works development (planning application reference: HGY/2017/2005), which rises to 33 storeys.

9 Additionally, the Berol Quarter scheme (planning application reference: HGY/2023/0261), for which planning permission was granted in March 2025, will include the redevelopment of 2 Berol Yard, which will rise up to 30 storeys plus ground floor.

10 Collectively, these policy designations and the existing townscape context support substantial growth, regeneration and housing delivery within Tottenham Hale, establishing the area as one of London's key regeneration and intensification locations. The wider planning framework promotes mixed-use redevelopment, tall buildings in appropriate locations, improved connectivity, and the creation of a new metropolitan centre around Tottenham Hale Station.

Receptors

Townscape

11 The proposed townscape character assessment study area would comprise an area of 1km from the site boundary. This distance is judged to be appropriate for including surrounding character areas where there would be intervisibility and effects to townscape character resulting from the proposed development. The Townscape Character Areas (TCAs) relevant to the assessment are identified on the 'Townscape Character Area Plan' within **Annex D** of the EIA Scoping Report and listed below:

- Townscape Character Area 1: Tottenham Growth Area;
- Townscape Character Area 2: Tottenham High Road Area of Change;
- Townscape Character Area 3: Infrastructure, commercial and light industrial corridors;
- Townscape Character Area 4: Riverside Development;
- Townscape Character Area 5: Walthamstow Wetlands; and
- Townscape Character Area 6: Tottenham Residential.

12 The townscape character areas to be covered will use the approach set out in the 3rd edition of the Guidelines for Landscape and Visual Impact Assessment[1] ('GLVIA3'). The approach will be informed by published character area studies, including conservation area appraisals.

13 These areas will be informed by a review of proximate heritage receptors, surrounding building locations and heights, topography, townscape features and an understanding of the scale and extent of visibility of the Proposed Development.

14 The site is located within the GLA's Upper Lee Valley Opportunity Area, and also lies within the Tottenham Hale District Centre, Tottenham Area Action Plan; and Tottenham Housing Zone. These designations collectively support significant growth and intensification, reinforcing the appropriateness of a robust development strategy.

[1] *Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA) (2013).*

Visual

15 Visual impact assessment relates to how people will be affected by changes in views and visual amenity at different places, including publicly accessible locations. Visual receptors are always people, although usually visual receptors are defined according to use e.g. residential, business, road, footpath etc., rather than landscape features.

16 The visual study area has *not* been defined by a radius, although representative viewpoints proposed for assessment have been informed by a site visit, the location of heritage receptors, townscape considerations, and any views identified in the statutory development plan. It has been refined through the preparation of a zone of theoretical visibility (ZTV) for the Proposed Development up to 2km from the centre of the site, using Vu.City software. Following consultation with the local planning authority, including email correspondence dated 11TH May 2026, additional viewpoints were requested to assess potential effects on the Grade II listed Drapers' Almshouses at Bruce Castle, reflecting concerns raised through the Council's ongoing Tall Buildings Study for the emerging Local Plan. These views were subsequently incorporated into the visual assessment scope.

17 The final view locations are to be confirmed with the local planning authority through the pre-application process, The view locations are outlined in **Annex D**. There are 24 proposed views identified on the 'View Location Plan' within **Annex D**.

18 The views will be Accurate Visual Representations (AVR) produced in the following format:

- Existing - baseline photography;
- Proposed - 'existing' plus 'proposed', a wireline or render of the Proposed Development; and
- Cumulative - 'proposed' plus any relevant cumulative schemes.

19 A number of the views will be produced as renders to take account of the materiality and architectural form of the proposals relative to the local context. Mid to long range views will typically be produced as wirelines.

20 The study area for the visual assessment will be centred on the site and will be limited to locations from which the site can be seen, or from which the newly proposed buildings on the site have the potential to result in significant visual impact at the heights proposed.

21 Four principal types of viewing location will be identified:

- Views that have been identified as significant, by the Council or others, e.g. in relevant planning policy and guidance documents (including the London Plan London Views Management Framework (LVMF)) and conservation area appraisals;
- Other locations or views of particular sensitivity, including those viewpoints in which the Proposed Development may significantly affect the settings of listed buildings and conservation areas;
- Representative townscape locations from which the Proposed Development will be visible; and
- Locations where there is extensive open space between the viewer and the Proposed Development so that it will be prominent rather than obscured by foreground buildings. The viewpoints will be chosen to encompass:
  - The range of points of the compass from which the Proposed Development will be visible;
  - A range of distances from the site; and
  - Different types of townscape area.

22 The study area and the possible locations will then be visited to sense check and establish candidate viewpoints.

23 A visualisation consultant will be appointed to produce Accurate Visual Representations (AVRs). A number of views may also be provided as indicative CGIs or non-verified massing studies produced in VuCity, in addition to the AVRs produced.

Potential Effects

Enabling Works and Construction

24 Enabling works and construction effects are likely to vary according to their temporary nature and some operations may have more perceptible effects than others. The TVIA will be based on a reasonable worse-case

scenario when construction activities are at their peak. The effects are likely to vary according to the distance between the receptors and the site, with those receptors located closer to the site more exposed to a higher visibility of machinery and infrastructure as well as non-visual effects such as noise, and likely to experience a larger effect than those located at greater distance. These effects are likely to be adverse but short-term, temporary and reversible (e.g. they form part of the process leading towards operation) and so their magnitude will be stated accordingly. The assessment of effects caused by enabling works and construction will be based on professional judgement.

Completed Development

25 The scope of the townscape and visual impact assessment in relation to the completed Proposed Development, will include:

- The effects of the Proposed Development on the quality of local views, the amenity of the viewer and the appearance, character and function of the local townscape; and
- The associated change in the townscape and spatial character and quality within the study area;

Townscape and Visual

26 The framework for assessment of townscape and visual impact has been prepared using the GLVIA3. The assessment has regard to the methodology set out in An Approach to Landscape Character Assessment[2] (2014) prepared by Natural England.

- The assessment of townscape effects: assessing effects on the townscape as a resource in its own right; and
- The assessment of visual effects: assessing effects on specific views and on the general visual amenity experienced by people.

27 Townscape is defined in GLVIA3 as the "*built-up area, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces*".

28 Visual impact assessment relates to how people will be affected by changes in views and visual amenity at different places, including publicly accessible locations. Visual receptors are always people, although usually visual receptors are defined according to use e.g. residential, business, road, footpath etc., rather than landscape features.

Methodology

Townscape and Visual

29 The TVIA will form a volume of the Environmental Statement. Structured, informed and reasoned professional judgement will be used to take account of quantitative and qualitative factors. This is widely accepted as best practice and is based on analysis of desk-based research and field assessment.

30 The approach to assessment will be explained fully in the TVIA. In summary, the approach to assessment has three stages:

- Baseline assessment of value;
- Assessment of sensitivity and magnitude of impact; and
- Assessment of likely effect.

31 The methodology will describe the criteria and approach to assessment at each stage outlined above. The first stage is undertaken at baseline assessment. The second and third stages are part of the assessment of the Proposed Development.

32 The assessment of sensitivity involves a judgement as to the susceptibility of the receptor (be it townscape or visual) to the changes arising from the Proposed Development. The susceptibility is then calibrated with the value of the receptor to result in its sensitivity.

[2] *Natural England, An Approach to Landscape Character Assessment (2014).*

33 The likely effect of the Proposed Development upon a receptor is based upon a calibration of the sensitivity of the receptor and the magnitude of impact. This results in a likely effect in the following: None, Negligible, Minor, Minor-Moderate, Moderate, Moderate-Major or Major.

34 The nature of the likely effect, either beneficial or adverse, is then described. This applies to all likely effects (Negligible to Major) unless the likely effect is identified as None.

35 A likely effect is judged to be significant for the purposes of the EIA if it is Moderate, Moderate-Major or Major. The lesser likely effects in the scale (Minor-Moderate and below) are not significant.

Mitigation Measures

36 Measures proposed to prevent, reduce or where possible offset any adverse likely effects will be identified and developed as part of the design process. Primary mitigation measures, including architectural and urban design, will become embedded into the Proposed Development, commonly referred to as 'embedded mitigation'. Any specific embedded mitigation in relation to townscape and visual impacts will be set out within the ES Volume.

37 The likely effects of the Proposed Development will include consideration of embedded mitigation. As a result, there may be no requirement for additional mitigation. If this is the case, likely residual effects would remain the same as the likely effects, unless otherwise stated.

Cumulative Effects

38 GLVIA3 sets out two main approaches to inter-project effects between any given proposed development and cumulative schemes (See GLVIA, paragraph 7.18). The first approach is to focus primarily on the additional effects of the main project under consideration on top of the cumulative baseline. The second approach is to focus on the combined effects of all the past, present and future proposals together with the new project.

39 The cumulative assessment for the Proposed Development will take the first approach, which is to focus on the additional effects of the Proposed Development on top of the cumulative baseline. It is considered that this approach is best suited to an urban environment, in which the cumulative effects between the Proposed Development and other cumulative schemes may be complex (including situations in which the effect of the Proposed Development could be lessened or removed entirely by cumulative schemes) and because, as also acknowledged in the GLVIA3, it may not be considered reasonable to assess the effect of many complex schemes other than the Proposed Development in the manner required by the 'combined effects' approach.

40 Relevant cumulative schemes will be considered within the assessment, please refer to **Annex C**.

41 In addition to the schemes identified within **Annex C**, the emerging Cannon Factory redevelopment has the potential to contribute to cumulative townscape and visual change within the wider Tottenham Hale area. Accordingly, the assessment will also consider a secondary cumulative scenario that includes the Cannon Factory redevelopment. Given its emerging status, this assessment will be undertaken on a qualitative basis, informed by the information available at the time of the assessment.

42 Whilst the cumulative baseline already reflects substantial planned and ongoing change within Tottenham Hale, the Proposed Development would contribute further to this process of regeneration and intensification. In combination with the identified cumulative schemes, the Proposed Development has the potential to reinforce the transformation of the townscape character of the area, as well as alter visual amenity from a number of receptors. Accordingly, cumulative townscape and visual effects may be greater than those arising from the Proposed Development in isolation. Where the additional scale, extent and interaction of changes result in a material alteration to townscape character or visual amenity, significant cumulative effects may arise.

Conclusion

43 It is considered that the Proposed Development could potentially give rise to significant beneficial effects with respect to townscape and visual impacts during the cumulative stage. It is therefore proposed that a townscape and visual impact assessment is '**Scoped In**' to the EIA.

Annex B: ‘Scoped Out’ Topic Sheets

TOPIC SHEET

Air Quality

Introduction

1 It is considered that significant effects relating to air quality are unlikely, and as such this topic is proposed to be ’**Scoped Out**’ of the EIA Trium Environmental Consulting LLP (Trium) has considered the potential for likely significant air quality effects and has prepared this topic sheet.

Baseline Conditions

Study Area

2 The study area for construction dust emissions is defined using the following screening criteria set out in The Institute of Air Quality Management (IAQM) *Guidance on the Assessment of Dust from Demolition and Construction*[1]:

- A ‘human receptor’ within 250m of the site boundary and/or 50m of the route(s) used by construction vehicles on the public highway, up to 250m from the site entrance(s); and
- An ‘ecological receptor’ within 50m of the site boundary and/or 50m of the route(s) used by construction vehicles on the public highway, up to 250m from the site entrance(s).

3 For construction and operational road vehicle exhaust emissions, human receptors within 200m of road links affected by the Proposed Development, as set out National Highways’ Design Manual for Roads and Bridges – LA105 Air Quality (Vertical Barriers)[2], are considered.

4 For emergency generator emissions, existing and proposed sensitive receptors located within 50 m of the flue termination will be considered. Data sources used to establish the existing baseline for air quality are:

- Air Quality Annual Status Report for 2024 — London Borough of Haringey — May 2025 — London Borough of Haringey Air Quality Annual Status Report for 2024[3]; and
- Background Mapping data for local authorities - 2021 — Defra — 2026 — Background Mapping data for local authorities - 2021 - DEFRA UK Air - GOV.UK[4].

Site and Local Conditions

5 The primary pollution source of the LBH Air Quality Management Area (AQMA) is from road transport. Vehicle emissions from the A1055 (Hale Road), Monument Way and Ferry Lane are most likely to influence pollutant concentrations at the site.

6 Local Air Quality Management Technical Guidance (TG22)[5] lists railway lines that should be considered in respect of heavy diesel passenger train traffic. The site is not located in proximity to any of the railway lines that should be considered. Railway emissions were therefore not considered further.

[1] *IAQM (2024) Guidance on the Assessment of Dust from Demolition and Construction v2.2*
[2] *National Highways (2024) LA 105 - Air quality (vertical barriers). Version 0.1.0. Available at: https://www.standardsforhighways.co.uk/tses/attachments/af7f4cda-08f7-4f16-a89f-e30da703f3f4*
[3] *London Borough of Haringey (2025) Annual Air Quality Status Report 2024. London: London Borough of Haringey. May 2025*
[4] *Defra (2026) Background Mapping data for local authorities - 2021 - DEFRA UK Air - GOV.UK*
[5] *Department for Environment, Food & Rural Affairs. 2022. Local Air Quality Management Technical Guidance (TG22), March 2026. Available at: https://laqm.defra.gov.uk/wp-content/uploads/2021/03/LAQM-TG22-May-25-v2.1.pdf*

Background Data / Measured Levels

7 Continuous monitoring data (2021–2024) from the two nearest automatic monitors and 16 diffusion tubes within 3km are presented in Table 1 and Table 2.

- Automatic Monitors: NO_2 concentrations at Haringey Roadside were below the NO_2 AQO's from 2021-2024. Exceedances of the annual mean NO_2 AQO of 40µg/m^3 were recorded at the Haringey Wood Green monitor from 2021-2024. All other AQO's for NO_2, PM_{10}, and $PM_{2.5}$ from 2021–2024 were met at the Haringey Wood Green monitor from 2021-2024; and
- Environmental Improvement Plan (EIP): $PM_{2.5}$ was monitored at Haringey Wood Green only, the target of 10µg/m^3 by December 2030 was met in 2023 and 2024.

Diffusion Tubes

8 All 16 roadside diffusion tube locations within 3km of the site met the annual mean NO_2 objective between 2021 and 2024. Annual mean NO_2 concentrations decreased at all diffusion tube locations between 2021 and 2024, on average.

9 Defra Background Mapping (2025) as of 2025 suggest full compliance with AQOs, as set out in Table 3.

Table 1 Automatic LBH Monitoring Data Within Approximately 3km of the site, 2021-2024

Site Name (ID), Classification & Distance to Site	Pollutant	Air Quality Objective	Averaging Period	Concentrations			
				2021	2022	2023	2024
Haringey Roadside Roadside 1.1km northwest	NO_2	40µg/m^3	Annual Mean	32	30	27	25
		200µg/m^3 (c)	1-Hour Mean (No. of Hours)	0	0	0	0
Haringey Wood Green Roadside 3km west	NO_2	40µg/m^3	Annual Mean	**44**	**44**	**48**	**41**
		200µg/m^3 (c)	1-Hour Mean (No. of Hours)	0 (120)[a]	0	2	0
	PM_{10}	40µg/m^3	Annual Mean	16	19	16	13
		50µg/m^3 (d)	24-Hour Mean (No. of Hours)	0 (24)[b]	8	1	1
	$PM_{2.5}$	20µg/m^3 (e)	Annual Mean	10	12	10	9

Notes:

*Exceedances of the NO_2 annual mean objective of 40µg/m^3 are shown in **bold**.*

(a) If the period of valid data is less than 85%, the 99.8th percentile of 1-hour means is provided in brackets

(b) Where the period of valid data is less than 85% of a full year, the 90.4th percentile is provided in brackets.

(c) not to be exceeded more than 18 times a year

(d) not to be exceeded more than 35 times a year

(e) *Environmental Improvement Plan (EIP) 2025 sets out a target to require a maximum annual mean concentration $PM_{2.5}$ target of 10µg/m^3 by December 2030.*

Table 2 LBH Annual Mean NO_2 Monitoring Data Within 3km of the Site, 2021-2024

Site ID	Site Name	Classification	Distance to Site Centre (km)	Annual Mean NO_2 Concentrations (µg/m^3)			
				2021	2022	2023	2024
HR38	Welbourne Primary School N15	Roadside	0.4	22.4	23.6	21.9	16.5
HR36	Holy Trinity CE School, Tottenham	Roadside	0.5	29.1	29.3	29.8	24.5
HR48	Mulberry Primary School, N17 9RB	Roadside	0.7	20.6	23.8	23.0	17.8
HR30	Earlsmead Primary School, N17	Roadside	0.8	30.1	32.1	26.4	21.8
HR14a, HR14b, HR14c	639 High Road, N17	Roadside	1.1	30.9	30.5	24.7	23.2
HR49	151 Mount Pleasant Road, N17 6TQ	Roadside	1.2	23.7	27.4	20.2	19.0
HR47	134 West Green Road, N15 5AD	Roadside	1.3	30.3	30.2	26.3	24.4
HR55	Risley Avenue Primary, London N17 7AB	Roadside	1.5	31.2	31.3	30.3	23.7
HR56	Dukes Aldridge Academy, Almond Road, N17 0PG	Roadside	1.6	22.5	23.9	20.2	16.0
HR45	Tiverton Primary School, Pulford Road. N15 6SP	Roadside	2.0	17.5	22.1	18.5	15.9
HR35	Chestnuts Primary School	Roadside	2.2	23.8	25.5	23.0	20.0
HR50	Belmont Junior School, Rusper Road, N22 6RA	Roadside	2.3	19.2	20.8	19.4	16.9
HR24	Westbury Medical Centre, 205 Westbury Avenue, N22 6RX	Roadside	2.3	30.8	32.9	27.4	26.3
HR25	Rowland Hill Nursery, White Hart Lane	Roadside	2.5	23.0	24.5	22.4	14.7
HR21	Lordship Lane Primary School, N22 5PS	Roadside	2.5	21.4	23.3	19.8	16.6
HR46	Street John Vianney Roman Catholic Primary School, N15 3HB	Roadside	2.5	20.6	21.1	24.3	18.5
HR27	The Old Surgery, 572 Green Lanes, N8 0RP	Roadside	2.7	32.7	31.2	30.8	24.5

Table 3 DEFRA Background Concentrations for the Grid Square of the Site

Pollutant	AQO	2025 Annual Mean Concentration (µg/m^3)
NO_X	-	24.9
NO_2	40µg/m^3	17.9
PM_{10}	40µg/m^3	15.8
$PM_{2.5}$	20µg/m^3	8.7

Designations & Sensitive Features Statutory Designations

10 The site is in the Haringey AQMA, designated for annual mean NO_2, and 24-hour mean PM_{10}.

Non-Statutory Designations

11 Air Quality Focus Areas (AQFAs), designated by the Greater London Authority (GLA), are locations with high human exposure that exceed the EU Limit Value for annual mean NO_2 (40µg/m^3). The site is within the 'Tottenham Hale Gyratory and A10 High Road to Bruce Grove' AQFA.

Sensitive Receptors

12 Sensitive human receptors to air quality are locations where people experience long-term exposure or where more vulnerable populations are present. Examples in the vicinity of the site include the Rosa Luxemburg Apartments, adjacent to the north of the site.

13 Walthamstow Reservoirs Site of Special Scientific Interest are the nearest ecological receptors, located approximately 500m east of the site.

Current Land Use

14 The demolition works associated with the previous consent have since been undertaken and the site is currently cleared, with no buildings present.

Discussion for Scoping Out

15 Trium will undertake the Air Quality Assessment which will be submitted alongside the planning application to meet LBH's planning validation requirements.

Enabling Works and Construction

Potential Effects During Enabling Works and Construction

16 Temporary generation of dust from site establishment, excavation and construction will be managed through the implementation of appropriate best practice management and control practices, construction dust would be minimised. Mitigation measures would be agreed with the LBH, and in accordance with IAQM guidance[21], the use of effective mitigation measures is likely to ensure any residual effects would be not significant.

17 Construction vehicle routing emissions would be temporary, localised and must meet London Low Emission Zone (LEZ) Euro VI emission standards, else a daily charge must be paid. If construction vehicles exceed the EPUK/IAQM threshold criteria (>100 LDV AADT or 25 HDV then the effect of construction vehicles on individual receptors will be assessed within the standalone report. Construction HGV and LGV movements will be managed via a Construction Logistics Plan (CLP) and are not anticipated to give rise to significant effects.

18 Construction plant emissions such as the use of Non-Road Mobile Machinery (NRMM) during construction would also be temporary, localised, and compliant with LEZ NRMM standards. Any effects from NRMM would be not significant.

Cumulative Effects

19 The Proposed Development and all cumulative schemes would:

- Implement Construction Environmental Management Plans (CEMPs) (or equivalent) to mitigate potential dust emissions to an appropriate and acceptable level to the LBH;
- Implement a Construction Logistics Plan (CLP) and have construction routing agreed with the LBH; and
- Log all machinery with a 37kW - 560kW power rating on the Greater London Authority's NRMM register.

20 From the above, it is considered the potential cumulative residual construction effects would be not significant.

Completed Development

Off-Site Receptors

21 The Proposed Development would be car-free, with the exception of 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 air source heat pumps, which will not generate on-site emissions, and Mechanical Ventilation Heat Recovery (MVHR) for each unit. Emergency diesel generator(s) may be proposed for the provision of back-up power; however, only used for routine testing or during an outage. The location of any flue would ensure adequate dispersion away from sensitive receptors. If applicable, effects from emergency generator(s) would likely be not significant.

23 Based on an expected low vehicle trip generation and the proposed energy strategy, in accordance with the Environmental Protection UK & IAQM, Land-Use Planning & Development Control: Planning for Air Quality[6], the Proposed Development is not expected to give rise to significant air quality impacts. The effect of the Proposed Development on off-site human and ecological receptors would be not significant.

On-Site Receptors

24 The Haringey Roadside monitor, located on the High Road, is the closest automatic monitor and considered representative of NO_2 concentrations at the site.

25 The Haringey Wood Green roadside monitor, also located on the High Road in Wood Green, is considered representative of PM_{10} and $PM_{2.5}$ concentrations at the site.

26 Based on the pollutant concentrations in Table 1 and Table 2, it is considered the AQO's are likely to be met for future users of the site. The effect of local air quality on future users of the Proposed Development would therefore be not significant.

[6] *Environmental Protection UK & Institute of Air Quality Management (2017), 'Land-Use Planning & Development Control: Planning for Air Quality', EPUK & IAQM, London*

Cumulative Effects

27 No cumulative effects are anticipated as the Proposed Development and other developments will not generate significant on-site emissions from combustion plant and any vehicle emissions generated by the Proposed Development and cumulative schemes would be not significant.

Mitigation Measures

Embedded Mitigation (Primary / Design Related)

28 The Proposed Development has been designed to be car-free, with the exception of 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.

29 The Energy Strategy is likely to be electricity-led and comprise ASHPs with MVHR provided for each unit.

Secondary Mitigation (Secured by Planning Condition)

30 The implementation of appropriate best practice management and control practices set out within a CEMP and / or CLP to ensure construction dust and construction vehicle emissions are minimised, and any residual effects would be not significant.

31 A bespoke Travel Plan to encourage sustainable travel to and from the operational Proposed Development.

Conclusion

Basis for Scoping Out — Enabling Works and Construction

32 The implementation of appropriate best practice management and control practices would ensure construction dust and construction vehicle emissions would be minimised and any residual effects would be not significant.

Basis for Scoping Out — Completed Development

33 Based on the pollutant concentrations set out in the '*Baseline Conditions'* section, it is considered the UK Air Quality Objectives are likely to be met for future users of the site. The effect of local air quality on future users of the Proposed Development would therefore be not significant.

34 The Proposed Development would 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.

35 The Energy Strategy is likely to be electricity-led and comprise ASHP, with MVHR provided for each unit.

36 Emergency diesel generator(s) may be proposed for the provision of back-up power; however, only used for routine testing or during an outage. The location of any flue would ensure adequate dispersion away from sensitive receptors. If applicable, effects from emergency generator(s) would likely be not significant.

37 Based on the likely low vehicle trip generation and the proposed Energy Strategy, according to the EPUK/IAQM guidance, the Proposed Development is not expected to give rise to significant air quality impacts. The effect of the Proposed Development on off-site receptors would be not significant.

38 On this basis, it is proposed that an air quality ES chapter is '**Scoped Out**' of the EIA.

39 The Air Quality Assessment will be submitted as a standalone report to support the planning application to meet LBH's planning validation requirements.

TOPIC SHEET

Archaeology

Introduction

1 It is considered that significant effects relating to archaeology (below ground heritage) are unlikely, and as such this topic is proposed to be '**Scoped Out**' of the EIA. The need for archaeology to be scoped into the EIA has been considered by HEA, and the following provides a summary of baseline conditions and clarifies why no likely significant effects are expected.

Baseline Conditions

2 The baseline information for the Ashley House site has been informed by a review of the Greater London Historic Environment Record (GLHER) data, as well as the National Heritage List for England (NHLE) and data held by Haringey Council. The study area used for the baseline reporting comprised a 500m buffer from a central point within the site. This study area was based on GLHER requirements as well as professional judgement and standard practice. This data will be worked up into a full Archaeological Desk Based Assessment to accompany the planning application in due course.

3 No designated archaeological / heritage assets are located within the site, or within immediate proximity. The nearest listed building is along Monument Way over 300m to the southwest of the site, whilst the nearest Conservation Area is located along the High Road beyond the 500m study area to the west.

4 The site is located within an Archaeological Priority Area (APA) defined by the Council which is associated with the historic core of Tottenham Hale. The settlement appears to have originated in the Saxon or Medieval period on the basis of past findings which has identified evidence for Saxon and then 12-14th century activity. The APA has been classified Tier 2 by the GLHER as it contains a potential for Saxon to Medieval settlement activity. In addition, a Mesolithic working site has been found in the west of the APA on a site known as "Welbourne" and associated with activity adjacent to a potential water source.

5 The site is also located within an Archaeological Priority Area associated with the Lea Valley terrace gravels and former floodplain. This APA encompasses an area along the River Lea and is associated with further APAs in other London Boroughs along the course of the river. This APA is classified Tier 3 by the GLHER as it covers a vast landscape with a perceived potential to contain in particular organic palaeoenvironmental remains associated with wetland and riverine environments, as well as associated prehistoric exploitation of this landscape.

6 There has been no previous archaeological fieldwork within the site, as recorded by the GLHER.

7 Previous historic building recording has been undertaken at 16 Ashley Road to the immediate north of the site.

8 As recorded on the GLHER database, geoarchaeological deposit modelling and evaluation trenching has been undertaken across a number of plots within the Tottenham Hale historic core to the south and west of the site. This includes at the "Ashley Road West" site to the immediate south of the site and at "Ashley Road East" to the immediate east of this. There was limited evidence for archaeological remains found at these two sites, potentially suggesting they were beyond the historic core of settlement. The site would have each been located further beyond the historic settlement core.

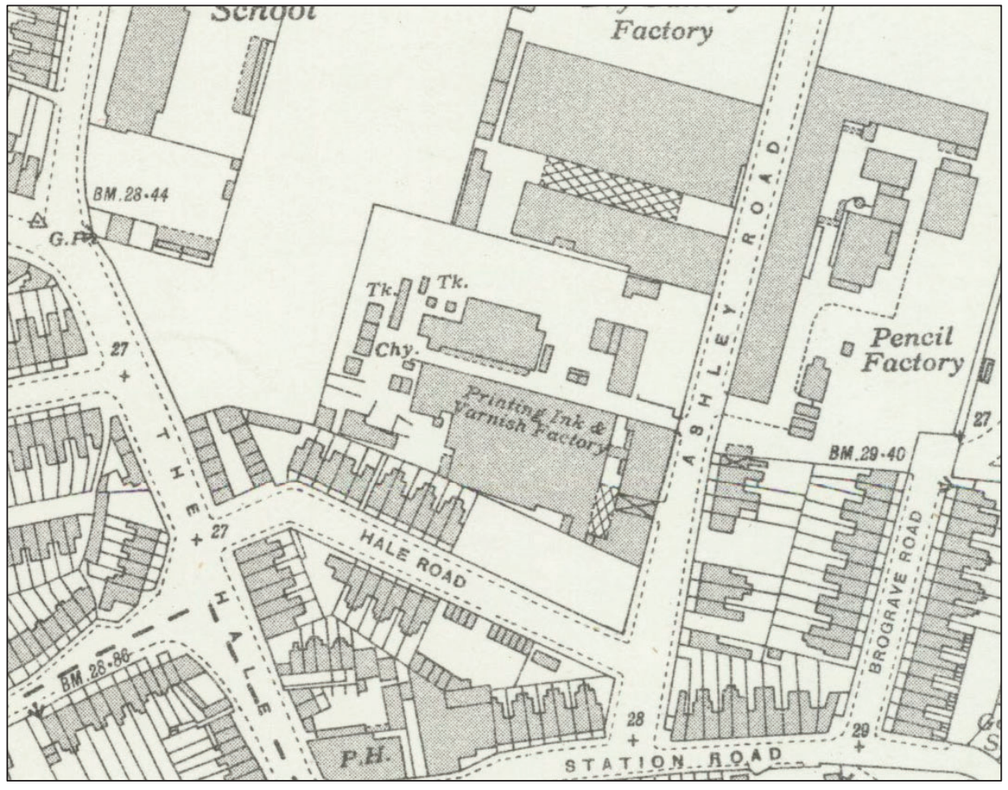
9 Further to the south at "Ferry Island" and "North Island" within circa 70-120m from the site, evidence for Medieval to Post Medieval settlement was identified and subject to archaeological excavation.

10 At "Welbourne" approximately 80m to the west of the site, evidence for some limited Saxon activity was found as well as evidence for a Mesolithic seasonal flint working site.

11 The site comprises open land likely utilised as pasture or arable land on late 19th century Ordnance Survey mapping. The site was developed by 1911 with a braids and bootlace factory, which was later expanded by 1936 and labelled at that time as a printing ink and varnish factory, as shown in Figure 1. The site was further redeveloped by 1999 into residential development and then entirely cleared of built form by 2024. It is considered very likely that the site has experienced extensive and severe disturbance and truncation of any archaeological remains which may have been present and pre-dated the 20th century. This would have reduced the importance of such remains if present.

12 On account of the available information and anticipated past ground disturbance, it is considered very unlikely that there would be any significant archaeological impacts as a result of the Proposed Development. If any remains were present, these would in the first instance comprise foundations and service trenches of 20th century date with no archaeological importance attached to them. Further to this, any earlier remains would very likely be heavily truncated and therefore of at most a low archaeological importance.

Figure 1 Historical Mapping of the Site (1936 - Ink and Varnish Factory)[1]



Discussion for Scoping Out

13 The development and later demolition phases at the site during the 20-21st century will have likely resulted in widespread ground disturbance, likely truncating or removing any sub-surface archaeological remains which may have been present, particularly within the footprints of the existing and former buildings.

14 Any sub-surface archaeological remains which may survive at the site are likely to have been truncated, and therefore likely to be of reduced archaeological importance. Given the anticipated limited potential for archaeological survival across the site, and likely negligible to low importance of any remains that may be present, it is considered that significant archaeological effects are unlikely as a result of the Proposed Development.

[1] *Contains OS data © Crown copyright and database rights.*

15 In addition, cumulative effects on archaeological remains alongside development of adjacent sites to the immediate south are considered unlikely.

16 Based on the previous consent under HGY/2016/4165, and subsequent reserved matters approved under HGY/2018/2353, the grant included the following conditions which pertained to archaeology, however, was later removed:

- **21. Archaeology (Written Scheme of Investigation):** In accordance with the Greater London Archaeological Advisory Service (GLAAS) letter, dated 5 January 2017, the proposal is unlikely to have a significant effect on heritage assets of archaeological interest and no further assessment or requirements relating to archaeology are necessary. Reason: To protect archaeological interests by providing an opportunity to investigate and record the site in accordance with London Plan (2015) policy 7.8 'Heritage Assets and Archaeology'. The Local Planning Authority is satisfied that the pre-commencement requirements of the condition are so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

17 Additionally, the appeal decision (Planning Application Reference: APP/Y5420/W/19/3232707) approving HGY/2019/0108 did not require further archaeological works to be undertaken prior to construction by way of an attached planning condition.

18 A baseline Archaeological Desk-Based Assessment will be produced to support the planning application. It is anticipated that the conclusions of this assessment will align with the previous HGY/2016/4165 application, when no archaeological mitigation strategy was required however, it is expected that statutory consultation will be undertaken by and relevant imposed conditions attached to any consent.

19 Further, there has been no change in the baseline so it is considered that inclusion of archaeology within the EIA is not proportionate and it could be scoped out.

Mitigation Measures

20 A baseline Archaeological Desk-Based Assessment will be produced to support the planning application. Based on the previous consent under HGY/2016/4165, the grant included the following conditions which pertained to archaeology, however was later removed:

- 21. Archaeology (Written Scheme of Investigation): In accordance with the Greater London Archaeological Advisory Service (GLAAS) letter, dated 5 January 2017, the proposal is unlikely to have a significant effect on heritage assets of archaeological interest and no further assessment or requirements relating to archaeology are necessary. Reason: To protect archaeological interests by providing an opportunity to investigate and record the site in accordance with London Plan (2015) policy 7.8 'Heritage Assets and Archaeology'. The Local Planning Authority is satisfied that the pre-commencement requirements of the condition are so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

21 It is anticipated that the conclusions of this assessment will align with the previous HGY/2016/4165 application, when no archaeological mitigation strategy was required however, it is expected that statutory consultation will be undertaken by LBH and relevant imposed conditions attached to any consent.

22 Further, there has been no change in the baseline so it is considered that inclusion of archaeology within the EIA is not proportionate and it could be scoped out.

Conclusion

23 As such, it is considered that the Proposed Development is not likely to result in in significant effects on archaeology (below ground heritage). Based on the above, it is proposed to '**Scope Out**' an assessment of the Proposed Development's effects on archaeology. This would align with the previous permission (planning application reference: HGY/2016/4165) for which there was no archaeological requirement.

TRIUM

TOPIC SHEET

Built Heritage

Introduction

1 It is considered significant effects relating to built heritage receptors are unlikely, and as such this topic is proposed to be '**Scoped Out**' of the EIA. The need for built heritage receptors to be scoped into the EIA has been considered by Montagu Evans, and the following provides a summary of baseline conditions and clarifies why no likely significant effects are expected.

Baseline Conditions

Current Baseline Conditions

2 Ashley House occupies a prominent plot on the western side of Ashley Road, situated immediately north of Tottenham Hale Station and its associated transport interchange. The site forms part of a wider cluster of development parcels extending along Ashley Road and Station Road, which are currently undergoing phased redevelopment.

3 To the east of the site are railway corridors associated with the West Anglia Main Line and Tottenham Hale Station, beyond which are recently completed and emerging residential-led developments, including purpose-built student accommodation. Further east lies the River Lee Navigation and associated open space corridors. To the west, the site is directly bounded by Down Lane Park, providing a significant area of public open space comprising formal sports pitches, recreational facilities and landscaped areas. Residential neighbourhoods extend beyond the park.

4 To the south, the urban context is defined by Hale Village, comprising medium- to high-density residential blocks, local retail provision and community infrastructure. The A503 Ferry Lane runs east–west to the south of the site, providing strategic connectivity within the wider road network and linking to the A10 corridor. To the north, the character becomes more varied, with a mix of retained industrial plots, redevelopment sites and emerging residential schemes.

5 The site falls within a number of significant strategic planning designations, including

- Upper Lee Valley Opportunity Area;
- Tottenham Hale District Centre;
- Tottenham Area Action Plan; and
- Tottenham Housing Zone.

6 In addition, the site benefits from a highly accessible location, situated approximately 135m from Tottenham Hale Station, which provides access to London Underground and National Rail services, as well as an extensive bus interchange. The site has a Public Transport Accessibility Level (PTAL) of 5. This high level of public transport accessibility supports the ongoing intensification of development within the surrounding area and reinforces the site's suitability for higher-density development.

7 There is an extant planning permission for redevelopment of the site (planning application reference: HGY/2016/4165), with further details approved via a reserved matters application (planning application reference: HGY/2018/2353), which allows for buildings of up to 16 storeys. The wider Tottenham Hale area has also undergone significant regeneration in recent years, resulting in the delivery of a number of substantial developments. These include the Hale Village Masterplan (planning application reference: HGY/2006/1177), which introduced residential buildings of up to 21 storeys; the completed 1 Ashley Road development (planning

application reference: HGY/2018/2223), comprising buildings of up to 18 storeys; the 2 Ashley Road scheme (planning application reference: HGY/2018/2223), which reaches a maximum height of 14 storeys; and the Hale Works development (planning application reference: HGY/2017/2005), which rises to 33 storeys.

8 Collectively, these policy designations support substantial growth, regeneration and housing delivery within Tottenham Hale, establishing the area as one of London's key regeneration and intensification locations. The wider planning framework promotes mixed-use redevelopment, tall buildings in appropriate locations, improved connectivity, and the creation of a new metropolitan centre around Tottenham Hale Station.

Built Heritage Context

9 A Heritage Asset Plan has been prepared that illustrates all designated and non-designated heritage assets in the study area (**Annex E**).

10 The site is not located within a conservation area, and there are no statutorily listed buildings or non-designated heritage assets within the site boundary. There are heritage assets within the surrounding area up to 1km from the site, comprising of conservation areas, listed buildings and locally listed building identified on the LBH Local list; however, these are generally located at least 500m from the site boundary. Consideration has also been given to heritage assets located beyond the defined study area; this includes designated assets of higher grading, as well as the Grade II listed Drapers' Almshouses which has been specifically identified by the LBH during pre-application discussions.

11 The closest designated heritage asset to the site is No. 62 Monument Way, located approximately 340m southwest of the site at its nearest point. No. 62 Monument Way is a Grade II listed late 18th-century three-storey house with a basement, built in brown brick with a stone-coped parapet. The building retains sash windows with gauged red brick arches and a decorative Georgian entrance with a radial fanlight and classical doorcase. A two-storey rear extension dates from the mid- to late-19th century.

12 Beyond this, the nearest designated heritage assets are located at a distance of approximately 495m or greater from the site. These assets are primarily concentrated along the historic routes of High Road and Bruce Grove, with the wider townscape comprising a limited number of more isolated designated heritage assets.

13 There are also a number of non-designated heritage assets included on the LBH Local List within a 1km radius of the site, the closest being No. 25 Berol House (formerly the Eagle Pencil Works) located opposite to the site on the western side of Ashley Road. The Eagle Pencil Factory is a locally listed industrial building constructed in 1907 for the Eagle Pencil Company (later Berol Ltd), which remained in production use until the late 20th century. It is expressed as a long, three-and-a-half storey structure in red and yellow brick, characterised by a regular bay rhythm, pilasters and corner towers, with a prominent central gable and utilitarian fenestration reflective of its historic industrial function. The building now forms a key component of the wider Berol Quarter development, a comprehensive mixed-use regeneration scheme delivering residential, commercial and public realm uses. The masterplan comprises a series of buildings of varying scale, including mid-rise elements and taller structures reaching approximately 30–32 storeys, while the former factory building is to be refurbished and adaptively reused as flexible workspace and retail accommodation, with a three-storey extension to be erected at roof level.

14 Similarly to designated heritage assets, with the exception of the adjacent locally listed building, the nearest non-designated heritage assets are located at a distance of approximately 410m to the west of the site or greater. These assets are primarily concentrated along the historic routes of High Road and Bruce Grove.

Discussion for Scoping Out

15 The Proposed Development has the potential to be visible and therefore influence the significance and setting of heritage assets within the area surrounding the site. That said, the site is situated within a varied urban context, including existing and emerging mid- to high-rise development. The nearest designated heritage asset to the site is No. 62 Monument Way, located approximately 340m to the southwest, with other designated heritage assets located at distances of approximately 495m or greater and primarily concentrated along the historic routes of High Road and Bruce Grove. Non-designated heritage assets are also present within a 1km radius, the closest being No. 25 Berol House (formerly the Eagle Pencil Works) to the east of the site along Ashley Road, with other locally listed assets generally located at distances of around 410m or more and similarly clustered along historic routes.

16 The heritage assets exist within a context already influenced by modern tall buildings, and their settings are experienced alongside existing high-rise developments. As demonstrated by the Heritage Asset Plan and ZTV Overlay (**Annex E**), intervisibility between heritage assets along the High Road is notably varied, with visibility generally occurring from perpendicular routes extending from the High Road. Where visible, the site is located at distance from the assets, and its redevelopment is unlikely to result in harm to heritage assets through changes to their setting. Accordingly, significant effects on the heritage assets are considered unlikely.

17 A stand-alone Heritage Impact Assessment will be produced, which will assess the effects of the Proposed Development on built heritage receptors. The Heritage Impact Assessment will include reference to Accurate Visual Representations (AVRs) prepared by a specialist visualisation company and will be undertaken in accordance with relevant planning legislation, policy, and guidance. The AVRs will include locations to test the visual impact relative to the Grade II listed Drapers' Almshouses which has been specifically identified by the LBH during pre-application discussions.

Cumulative Effects

18 In heritage best practice guidance there is specific reference to 'cumulative changes'. The word 'cumulative' in this context should be taken to mean incremental and the practical effect of this would be to increase the degree of harmful impact in specific cases, judged on a qualitative basis. Instances of incremental harm have, as matters of practice, normally come about when previous development is recognised to have created a harmful condition, to which a specific proposal adds, so potentially augmenting the pre-existing harm. In all cases, however, a freestanding assessment is required.

19 With regard to heritage assets in the wider area, the identified cumulative schemes are generally located at a distance from the relevant assets. The wider redevelopment of the surrounding area is therefore unlikely to result in harm to heritage assets through changes to their setting. Accordingly, significant cumulative effects on heritage assets are considered unlikely.

Conclusion

20 As such, it is considered that the Proposed Development is not likely to result in in significant effects on built heritage receptors. Based on the above, it is proposed to '**Scope Out**' an assessment of the Proposed Development's effects on built heritage receptors.

TOPIC SHEET

Climate Change and Greenhouse Gases

Introduction

1 It is considered that significant effects relating to climate change and greenhouse gases are unlikely, and as such this topic is proposed to be '**Scoped Out**' of the EIA Trium Environmental Consulting LLP (Trium) has prepared this Topic Sheet to consider the potential for likely significant effects of:

- The impact of climate change on the Proposed Development (the first section of this topic sheet); and
- The impact of the Proposed Development on climate change (the second section of this topic sheet).

Climate Change

Baseline Conditions

2 The 2022 UKCP Headline Findings[1] highlights the key climate projections for the UK. Relevant climate projections for the Proposed Development include:

- By the end of the 21st century, all areas of the UK are projected to be warmer, more so in summer than in winter;
- Hot summers are expected to become more common. The temperature of hot summer days, by the 2070s, show increases of 3.8°C to 6.8°C, under a high emissions scenario, along with an increase in the frequency of hot spells;
- Rainfall patterns across the UK are not uniform and vary on seasonal and regional scales and will continue to vary in the future;
- Significant increases in hourly precipitation extremes in the future;
- Despite overall summer drying trends in the future, future increases in the intensity of heavy summer rainfall events are likely;
- Future climate change is projected to bring about a change in the seasonality of extremes; and
- Sea levels rising.

Discussion for Scoping Out

Enabling Works and Construction, and Operation

3 The approach for determining the potential impact of climate change on the Proposed Development has been considered in accordance with Institute of Environmental Management and Assessment (IEMA) published guidance 'Climate Change Resilience and Adaptation' (2020)[2] which presents a framework for the consideration of climate change resilience and adaptation in the EIA process.

4 The Proposed Development would adhere to the latest Building and Health Safety Regulations and incorporate climate change resilience measures into the design to ensure all receptors (human, ecological, and building and infrastructure) would not be adversely affected by future climate variability.

[1] UKCP (August 2022), UK Climate Projections: Headline Findings.
[2] IEMA (2020). Climate Change Resilience and Adaptation.

5 Additionally, a Flood Risk Assessment, Drainage Strategy and Haringey Drainage Proforma and a Construction Environmental Management Plan (CEMP) will outline measures to be incorporated into the design to safeguard against flooding risks and effects at the site, accounting for climate change.

6 The ES will present any climate change adaptation and resilience measures designed into the scheme as part of the description of the Proposed Development (**ES Volume 1, Chapter 4: The Proposed Development**). Additionally, technical ES chapters will assess whether future climate conditions could alter the sensitivity of receptors or change the magnitude of impact defined in the assessments.

7 The impact of climate change on the Proposed Development will therefore be sufficiently addressed within the ES and wider planning application deliverables, without the need for a standalone ES chapter.

Cumulative Effects

8 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 (Primary / Design Related)

9 Embedded mitigation measures, influenced by climatic factors, will be incorporated into the design of the Proposed Development. These measures will strengthen long-term operational resilience, reduce vulnerability to climate-related stresses, and support the sustainability objectives of the Proposed Development.

Conclusion

10 It is considered that with embedded mitigation, the impact of climate change on the Proposed Development will not be significant in EIA terms. Based on the above, it is proposed to scope out an assessment of the effect of climate change on the Proposed Development.

Greenhouse Gases

Baseline Conditions

11 In the absence of the Proposed Development, and assuming no significant changes to the current site conditions, the future baseline at the site would remain largely unchanged from the existing baseline.

12 GHG emissions in the UK are likely to decrease, following decarbonisation and the UK's commitment to reaching net zero by 2050.

Discussion for Scoping Out

13 The approach to determining the potential impact of the Proposed Development on the climate has been considered in accordance with the IEMA's guidance 'Assessing Greenhouse Gas Emissions and Evaluating their Significance'[3]. This guidance sets out a 'good practice' approach to achieving a proportionate assessment of a development's potential impact on climate change and communicating the results in terms of a notional percentage contribution relative to a carbon budget, together with appropriate mitigation.

14 The guidance presents a series of principles developed by IEMA, which highlight that all GHG emissions contribute to climate change, and that the combined effect of all emissions draws us closer to the scientifically defined environmental limit for climate change. The IEMA guidance assigns significance criteria to the impact of a development's lifecycle GHG emissions, relative to its alignment with the UK Government decarbonisation targets to achieve Net Zero Carbon by 2050, and limit global temperature increase to 1.5°C above pre-industrial levels. For a development to comply with the net zero trajectory of decarbonisation, mitigation is encouraged early and throughout the design process, in line with IEMA's acknowledgement that the ability to effect change to achieve GHG emissions reduction for a project reduces over time.

15 Based on the scale of the Proposed Development, in the context of relevant greenhouse gas (GHG) emission benchmarks and budgets, it is considered unlikely the contribution of GHG emissions associated with the Proposed Development (including embodied carbon within materials and operational carbon emissions) would lead to material changes in climate conditions over the life of the Proposed Development.

[3] IEMA, (2022); 'Assessing Greenhouse Gas Emissions and Evaluating their Significance', 2nd Edition

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 Manual[1]) 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 Appraisal[2], British Standard 42020 on Biodiversity – Code of Practice for Planning and Development[3] and CIEEM's Guidelines for Ecological Impact Assessment (EcIA)[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 (EcIA), 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 EcIA:

- 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 Borough[7]. 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 Report[8] 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 EclA. 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 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 guidance[10]. 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.

[8] *London Wildlife Trust (2024) Walthamstow Wetlands Brid Monitoring report Year 9: April 2023 to March 2024.*

[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 ZoI 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 Organix 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 comparators[1].

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 England[2]. 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 Death[3]

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
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

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.

[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.*

8 The local economy supports approximately 97,000 jobs within the LBH, with a job density of 0.52 jobs per working-age resident[4]. 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 occupations[5].

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

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.

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 2017[7]. 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 (IEMA[8], 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 London[13]), 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 home[14]. 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 homes[15] (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 re 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 500m^2 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 500m^2 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 Primer[1]) 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.

[1] *ISEP (formally IEMA) (2020): 'Major Accidents and Disasters in EIA: A Primer'.*

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 Register[2], 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

[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
Flooding: Covering a range of scenarios including fluvial, surface water run-off and tidal flooding and combinations thereof.	High to Very High	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
Severe Weather: Including drought, severe storms, low temperatures / heavy snow and heatwaves.	High	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)*
Structural Incidents: Relating to land movement.	Medium	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
Severe Space Weather: Relating to the effects of solar winds and its potential effects on power distribution networks, satellite services, aviation and other digital systems.	Very High	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			
Major Industrial Accidents: Covering a range of scenarios involving explosions, fires and the release of a range of hazardous and combustible materials from industrial processes. Other scenarios	Low to High	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.	
Major Transport Accidents: Considers a range of transport related accidents for different modes of transportation, including road, air, rail and sea.	Low to High	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
Disruptive Industrial Action: Covering industrial action by workers in a range of public and other services industries.	Medium to High	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
Public and Crowd Events: Relating to the mass influx of non-resident British nationals and public disorder	Medium	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
Malicious Attacks	High to Very High	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

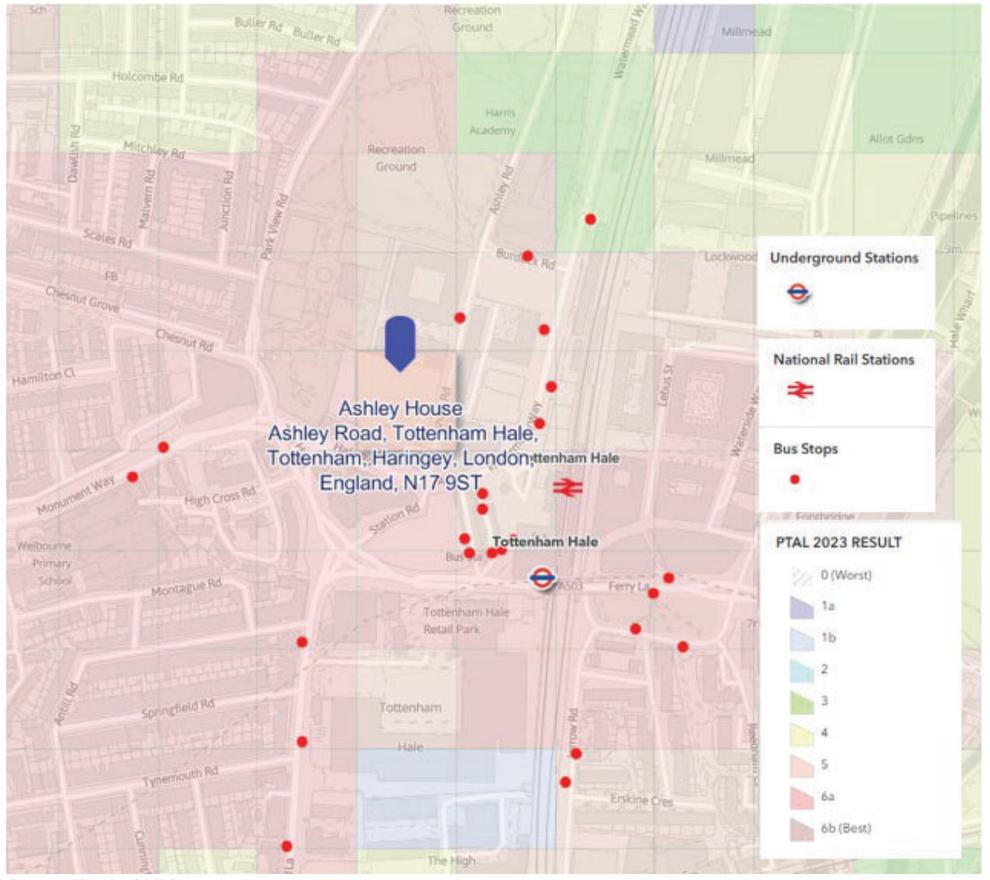
4 The site is located in Tottenham Hale within the London Borough of Haringey (LBH), in an area of mixed character that includes industrial, commercial, retail and residential uses. The site lies along Ashley Road and comprises a parcel of land fronting Ashley Road to the east and Down Lane Park to the 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 Service[1]

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 2023[2] address specific traffic and movement related impacts, consistent with, but expanding upon, the categories identified in the 1993 Guidelines[3], 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 Assessment[1], 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 Regulations[5], 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 Specification[7] 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 below[10]. 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] *Noth 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 guide[11], 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

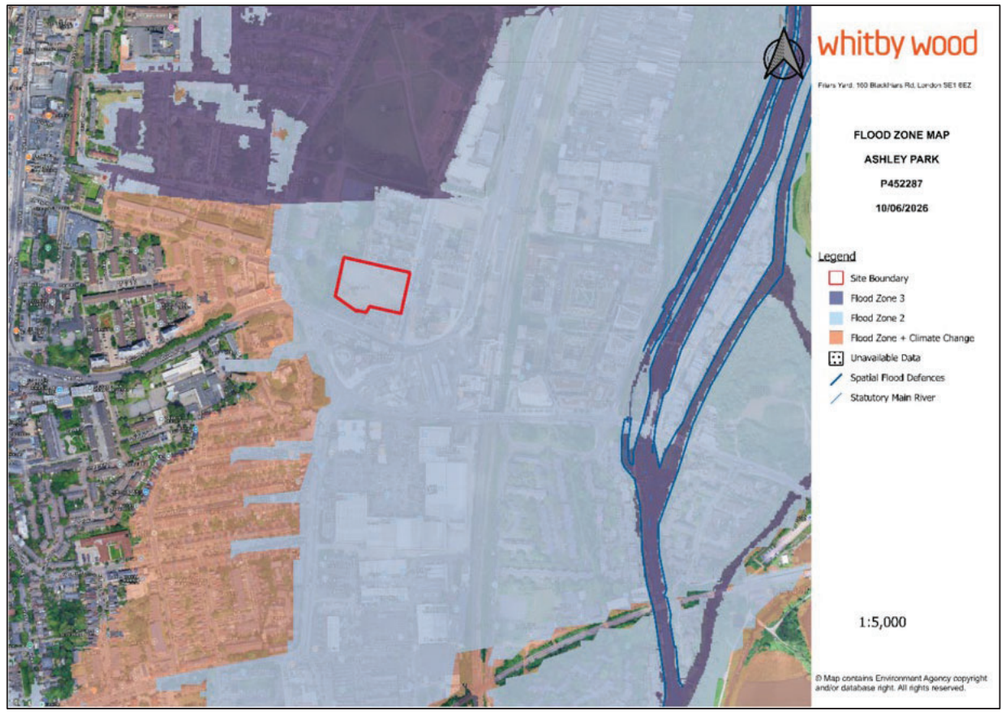


Figure 2 Risk of Flooding from Rivers and Seas Extent Map

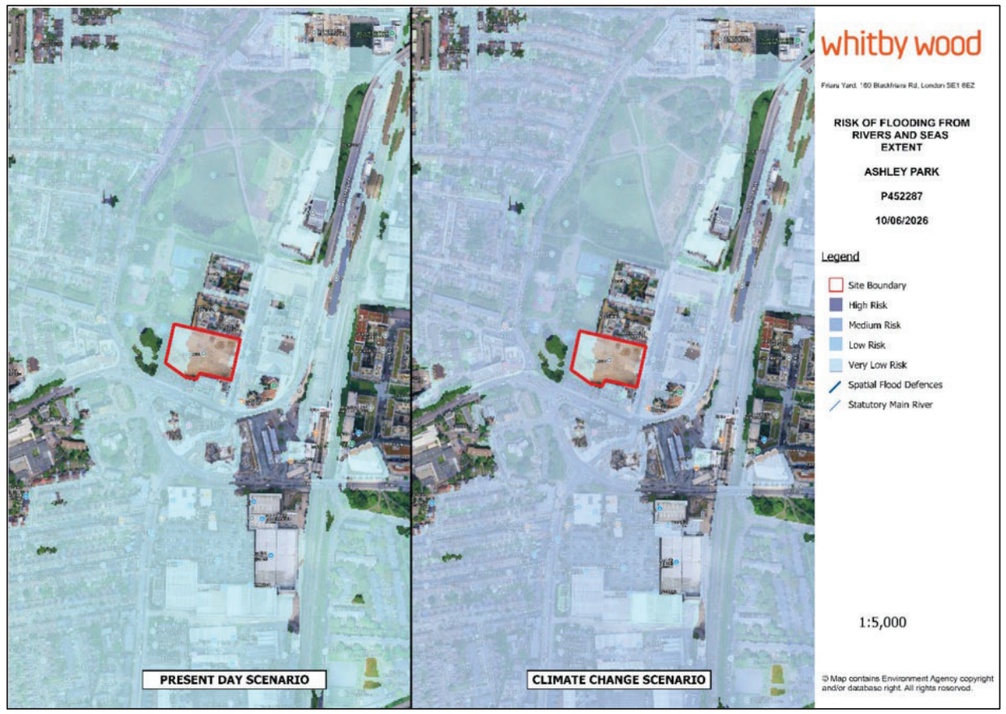
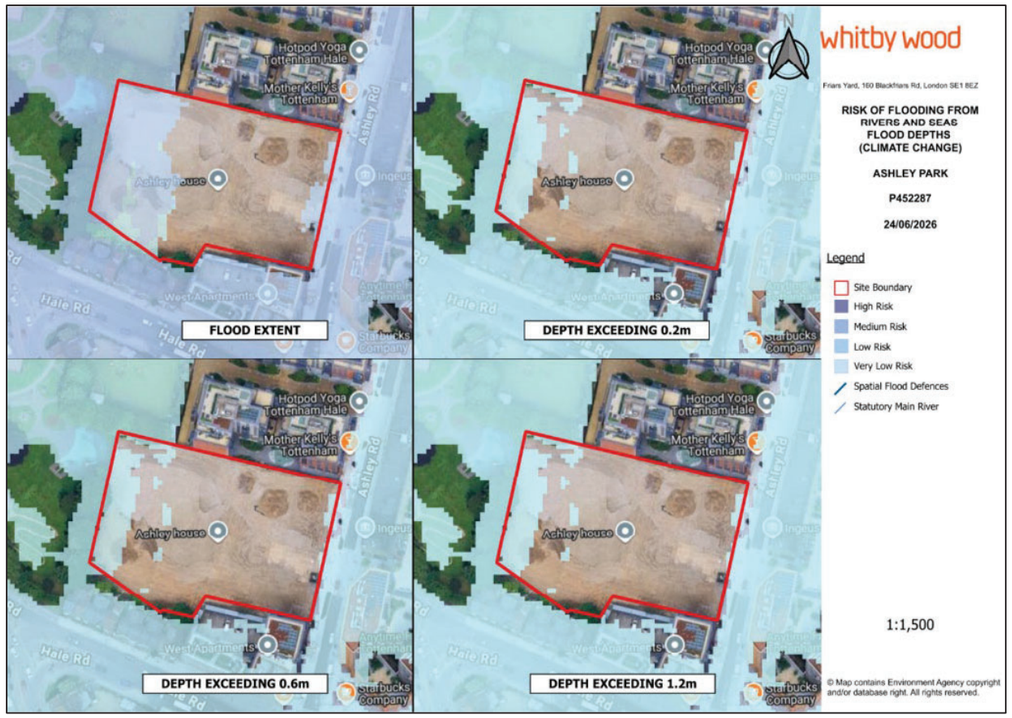


Figure 3 **Risk of Flooding from Rivers and Seas Including Climate Change Depth Map**

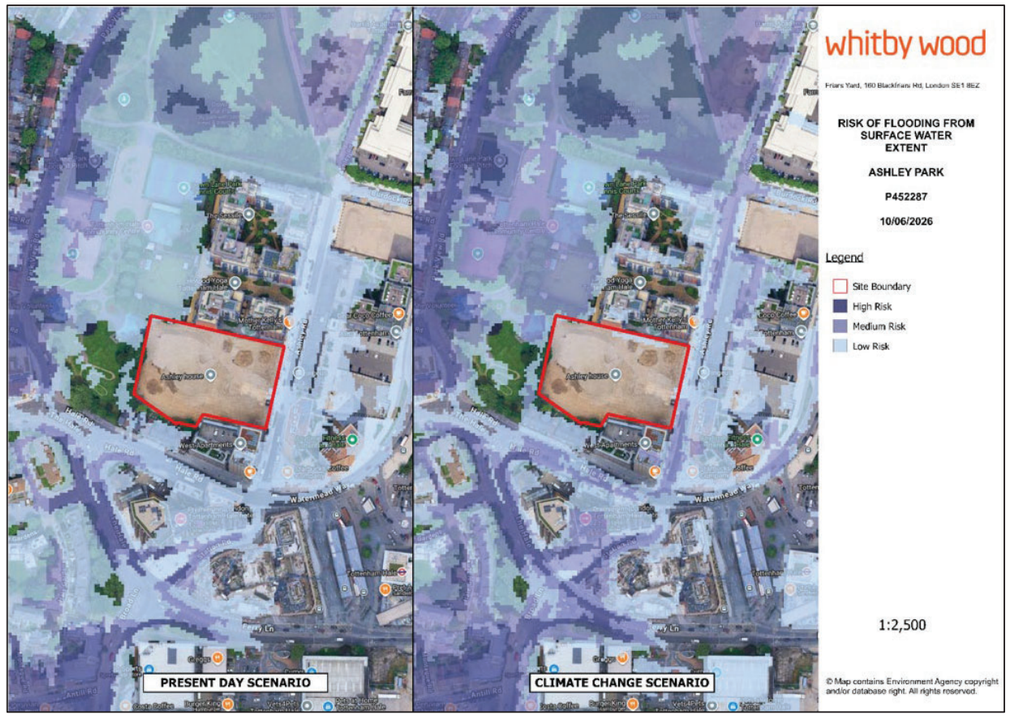


Surface Water Flooding

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**

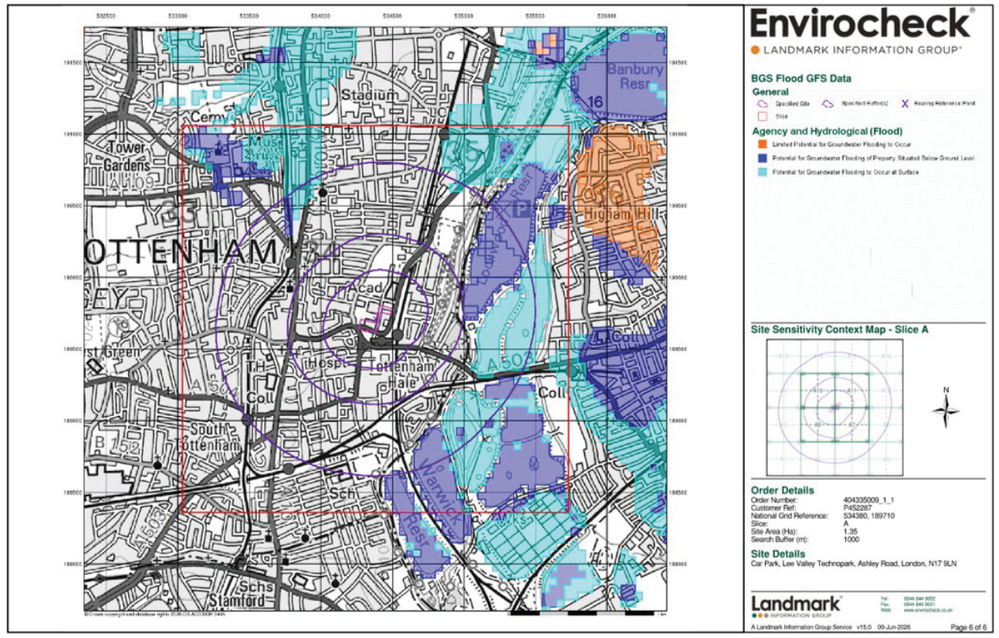


Groundwater Flooding

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 5[6] 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'.

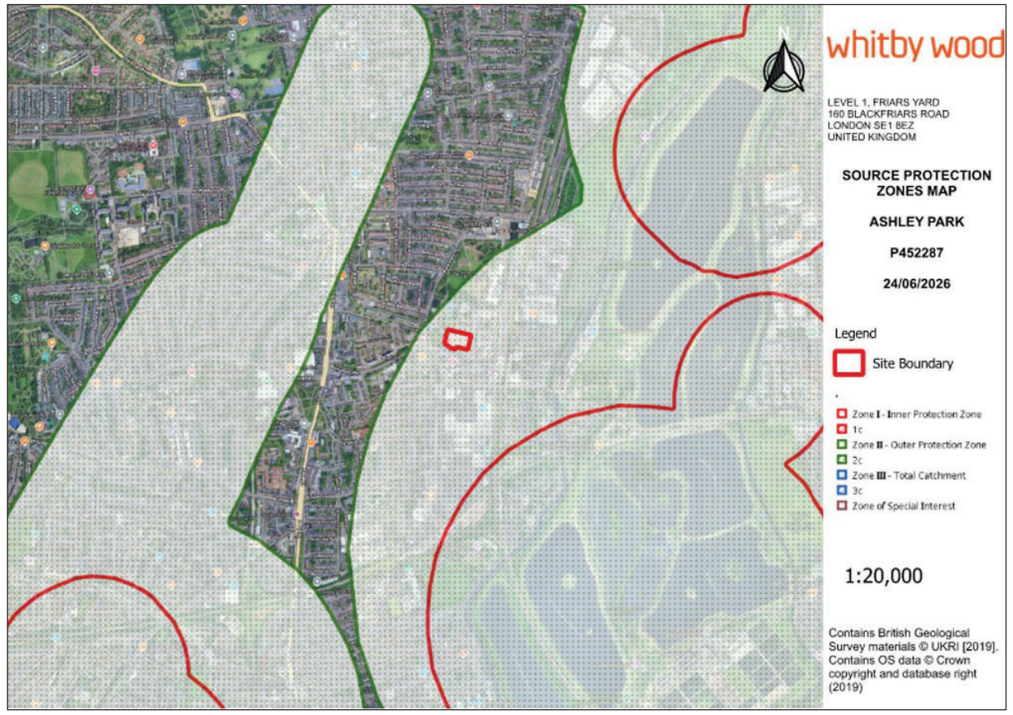
Artificial and Reservoir Flooding

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 polices.

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 Assessment[8] and Local Flood Risk Management Strategy and 5-year Delivery Plan[9];
- 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.

[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).*

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 m^2 (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.

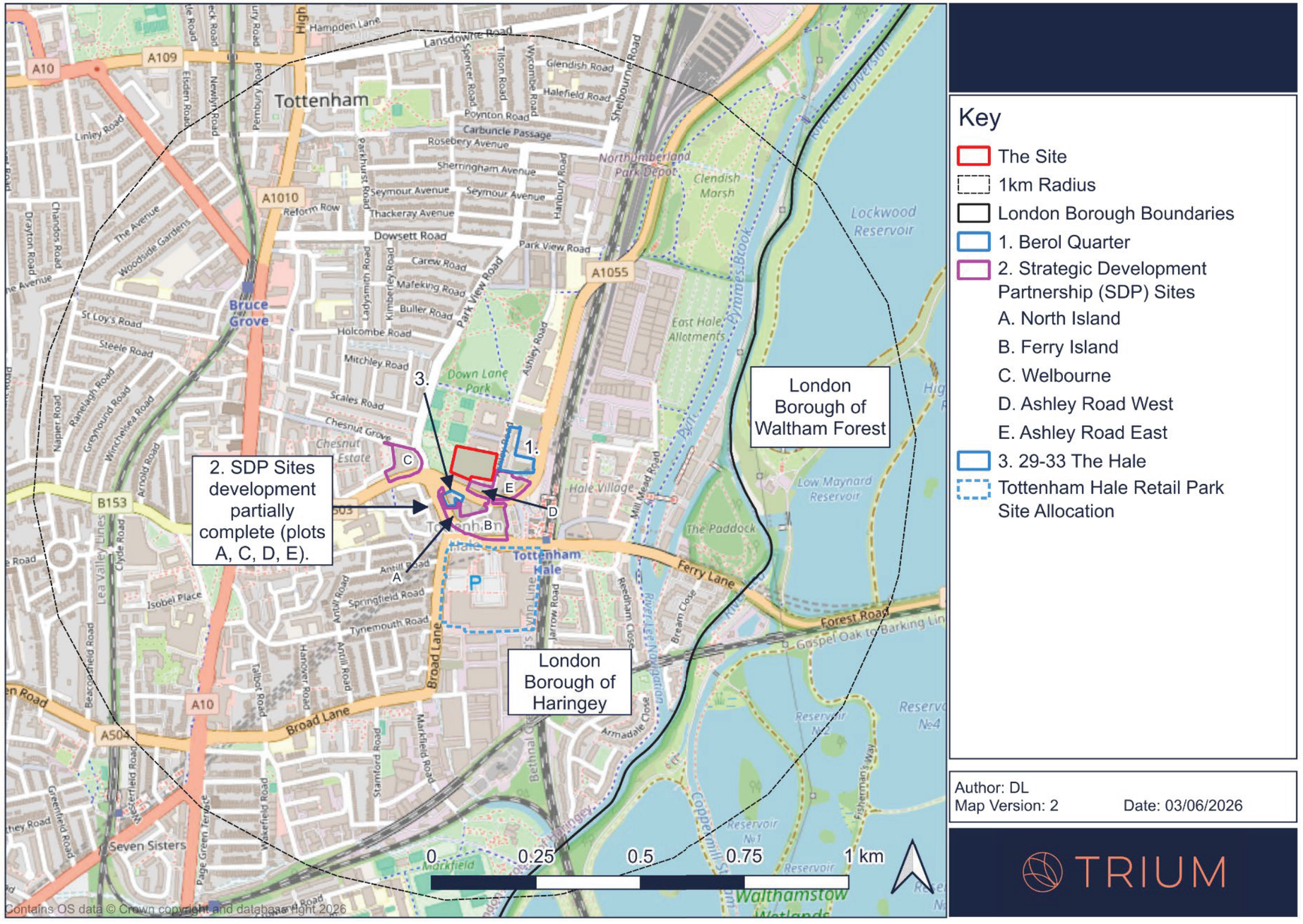
A map has been provided as Figure 7, which shows the approximate location of the cumulative schemes list in Table 7.

Table 7 Cumulative Schemes List

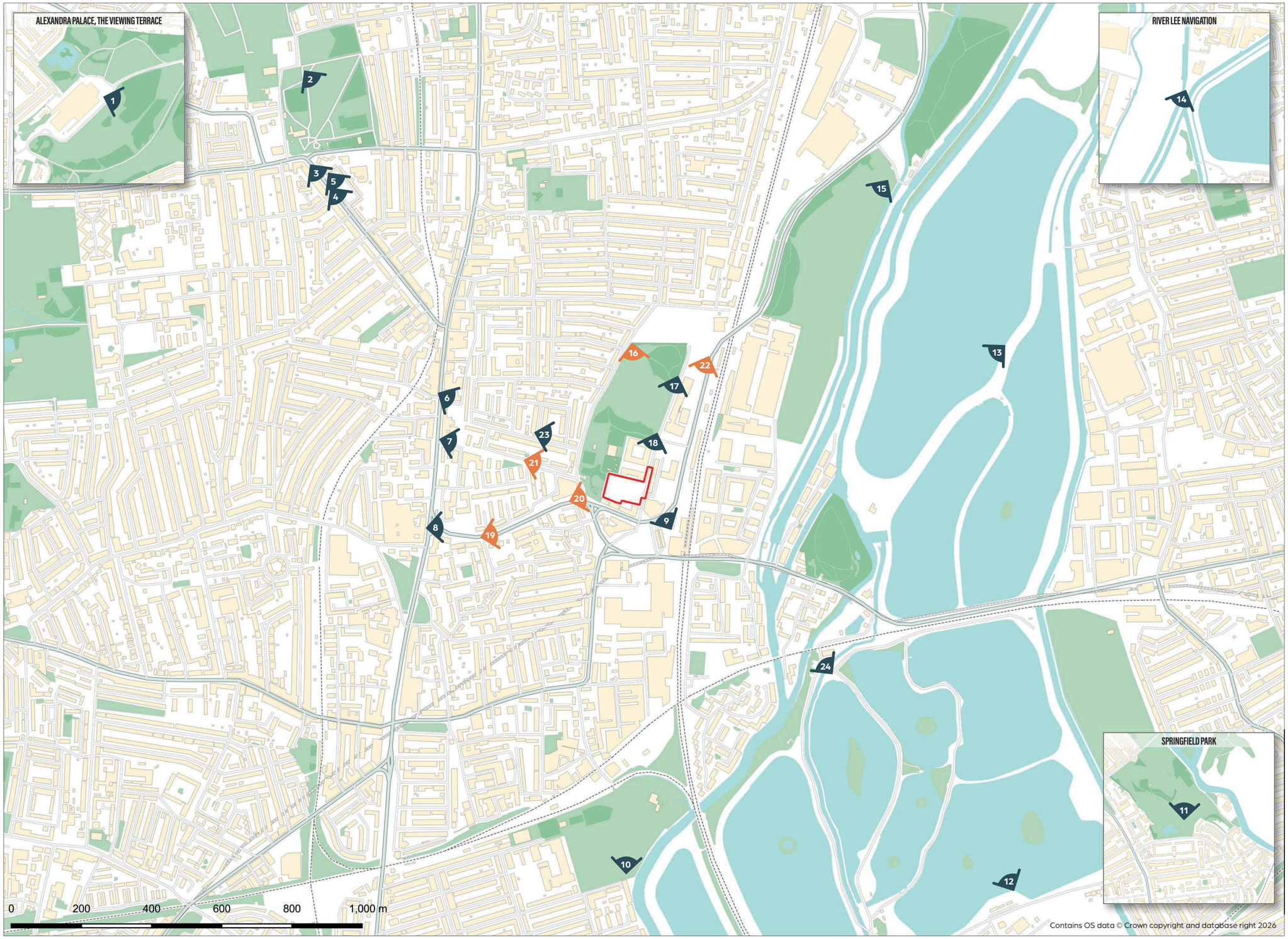
No.	Address	Description	Reference	Status
Schemes that are Approved and which form part of the Cumulative Assessment				
1	Berol Quarter, Ashley Road, London, N17 9LJ, London	Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment 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

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) *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.*	HGY/2018/2223	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/2021/2304	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, 18,500m^2 of Town Centre uses (Class E, F and Sui Generis), and 2800m^2 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



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VIEW LOCATION PLAN

- Application Site
- Wireline (AVR1)
- Render (AVR3)

1. Alexandra Palace, the viewing terrace
2. Bruce Castle Park
3. Bruce Grove (1)
4. Bruce Grove (2)
5. Edmansons Close Courtyard
6. High Road and Stoneleigh Road Junction
7. High Road and Chesnut Road Junction
8. High Road and Monument Way Junction
9. Tottenham Hale Station
10. Markfield Park
11. Springfield Park
12. Walthamstow Wetlands (south east)
13. Walthamstow Wetlands (north)
14. River Lee Navigation
15. Tottenham Marshes
16. Down Lane Park
17. Ashley Road (1)
18. Ashley Road (2)
19. Monument Way (1)
20. Monument Way (2)
21. Junction of Hamilton Close and Chesnut Road
22. Watermead Way
23. Scales Road
24. Engine House

LOCATION:
Ashley House, Ashley Road, Tottenham

DATE:
July 2026

SCALE:
1:11,000 @ A3

FIGURE:

NORTH

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TOWNSCAPE CHARACTER AREA PLAN

- Application Site
- 1 Tottenham Growth Area
- 2 Tottenham High Road Area of Change
- 3 Infrastructure, commercial and light industrial corridors
- 4 Riverside Development
- 5 Walthamstow Wetlands
- 6 Tottenham Residential

1 km

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LOCATION:
Ashley House, Ashley Road, Tottenham

DATE:
July 2026

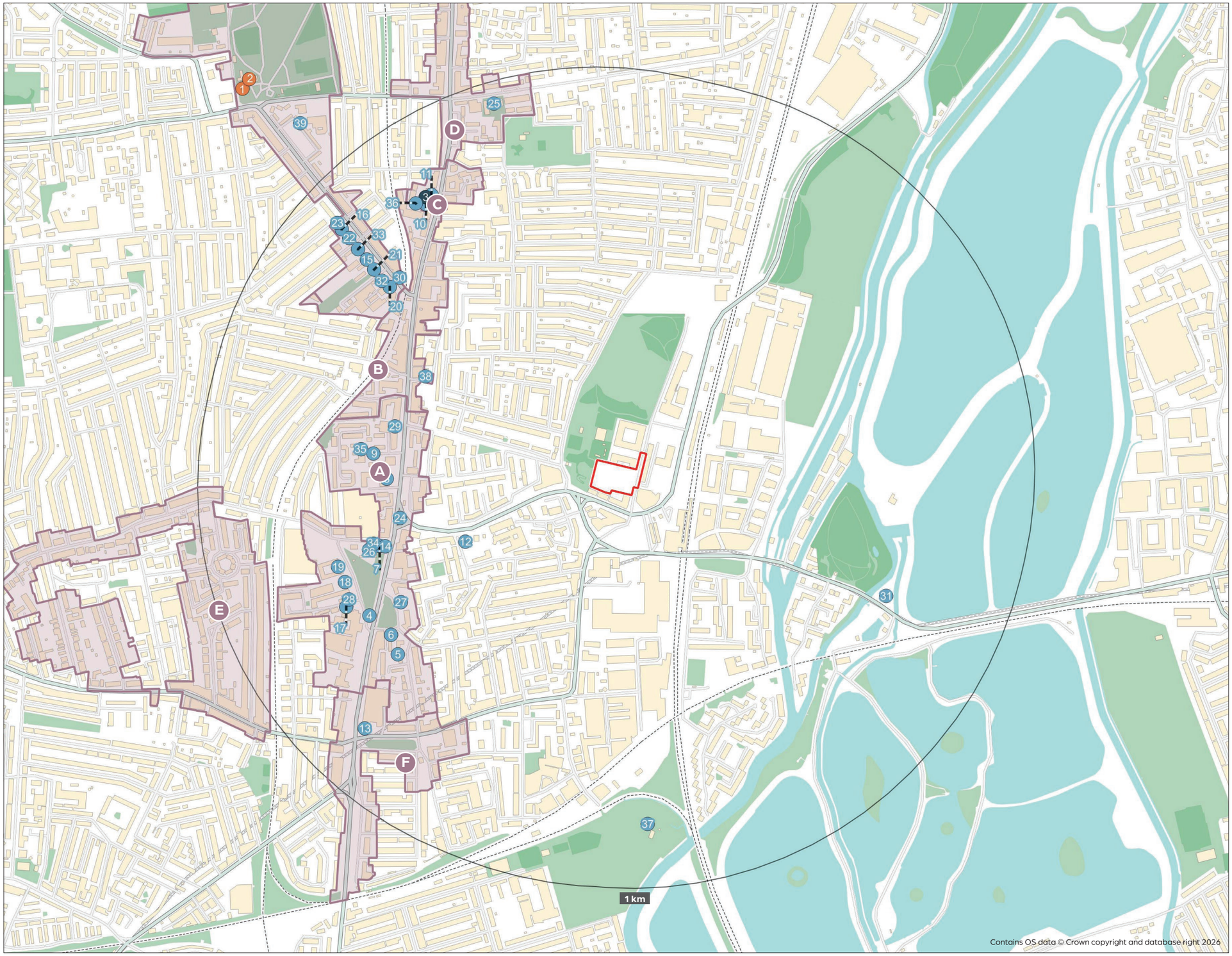
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▲ **NORTH**

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Annex E: Heritage Asset Plan



HERITAGE ASSET PLAN

Application Site

Conservation Areas

A. Tottenham Green
B. Bruce Grove
C. Scotland Green
D. North Tottenham
E. Clyde Circus
F. Seven Sisters/Page Green

Listed Buildings

Grade I

1. Tower to South west Of Bruce Castle
2. Bruce Castle

Grade II*

3. 583 and 585, High Road N17

Grade II

4. War Memorial
5. Spring Cottage
6. 2, 4 and 2a, Tottenham Green N15
7. Holy Trinity Church School
8. The British Legion Club
9. Gate Piers and Railings to Forecourt of High Cross School
10. Charlton Cottage
11. Walls in Front of Numbers 583 and 585
12. 62 Monument Way
13. Barclay's Bank
14. Old Well and Well House
15. 9 and 10 Bruce Grove including The Front Boundary Wall to Number 9 and Rear Boundary Wall Between Numbers 9 and 10
16. 15 and 16 Bruce Grove (Elm Place) with 15a Bruce Grove
17. Former Tottenham Fire Station
18. Former Tottenham Public Baths
19. Former County School
20. 1–4, Bruce Grove N17
21. 7 and 8, Bruce Grove N17
22. 13 and 14 Bruce Grove
23. Wall to North of Garden of Number 16 Fronting The Avenue
24. Tottenham High Cross
25. Church of St Mary The Virgin
26. Church of Holy Trinity
27. Pair of Houses in North east Part of Prince of Wales's General Hospital Grounds
28. Tottenham Town Hall
29. Mecca Bingo Hall
30. Public Toilet, Bruce Grove, including Above-Ground Pavilion and Subterranean Chamber, with Staircase, Railings, Gateways, and Pavement Lights
31. The Ferry Boat Inn
32. 5 and 6 Bruce Grove
33. 11 and 12 Bruce Grove
34. Forecourt Wall to Church of Holy Trinity, with Side Walls to Back of Grounds Fronting to Philip Lane
35. High Cross School
36. Walls Along south Boundary of Number 581 and Around Back Gardens of Numbers 581, 583 and 585
37. Pumping Station Building and Engine
38. The Beehive Public House
39. Chapel at Drapers' Almshouses The Drapers' Almshouses

LOCATION:
Ashley House, Ashley Road, Tottenham

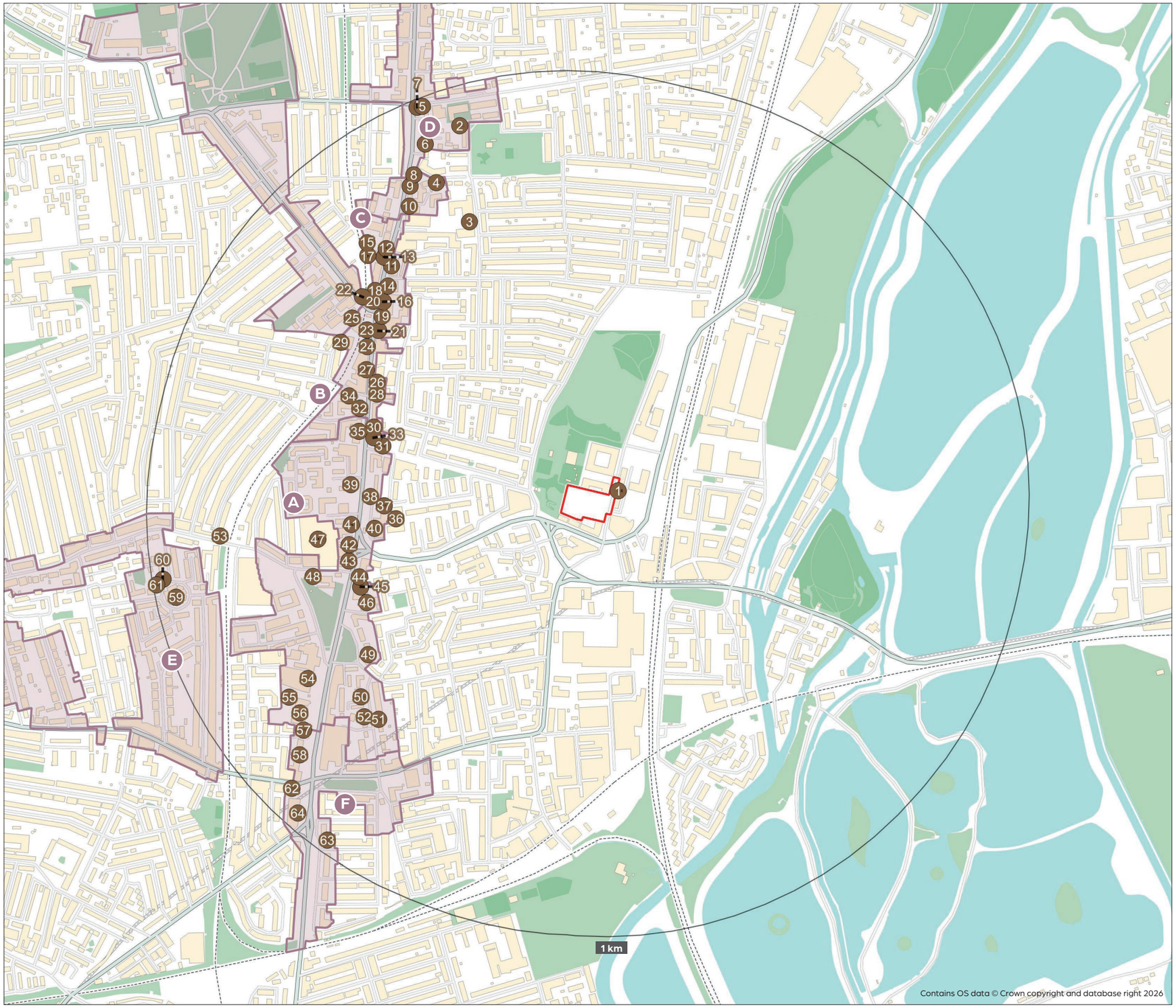
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NON-DESIGNATED HERITAGE ASSETS

Application Site

Conservation Areas

A. Tottenham Green
B. Bruce Grove
C. Scotland Green
D. North Tottenham
E. Clyde Circus
F. Seven Sisters/Page Green

Locally Listed Buildings

1. Berol House
2. Hall south of St Mary's Church, Kemble Road
3. Down Lane & Parkhurst School
4. Nos. 30–42 Scotland Green
5. No. 1a (Former JAP Motor Cycle & Racing Car Engineering Works) Lansdowne Road
6. No. 628 High Road
7. No. 634 (former Red Lion Public House) High Road
8. Prince of Wales Public House (see High Road (east side)
9. No. 612 (former Prince of Wales Public House) High Road
10. No. 596 High Road
11. Nos. 538 to 554 (even) (Windsor Parade 1907) High Road
12. Nos. 551 & 553 High Road
13. No. 549 High Road
14. Nos. 530 to 536 (even) High Road
15. No. 551a (former Brewery Morrison Yard) High Road
16. Nos. 522 to 528 (even) High Road
17. No. 551B (former Electricity Substation) High Road
18. Nos. 527 to 543 (odd) High Road
19. No. 510 and 510a High Road, and Nos. 512 to 520 (even) High Road
20. Nos. 513 to 525 (odd) High Road
21. Nos. 492 to 500 (even) High Road, and Nos. 502 to 508 (even) (former Burton's store) High Road
22. Nos. 117 & 118 (former Cinema) Bruce Grove
23. Bruce Grove Rail Station – High Road
24. Nos. 497 & 499 (The Ship Public House) High Road, and Nos. 501 to 507 (odd) High Road
25. Holly Cottage (former Station Master's House) Moorefield Road
26. No. 462 High Road
27. Nos. 479 to 491 (odd) Warner Terrace High Road
28. Nos. 448 to 454 (even) (former Marks & Spencer store) High Road
29. No. 22 (former Royal Mail Sorting Office) Moorefield Road
30. Nos. 416 & 420 High Road
31. No. 1 (Stoneleigh) – Chesnut Road
32. Nos. 455 to 465 (odd) including St Mark's Church – High Road
33. Nos. 412 & 414 High Road
34. No. 1 (corner shop) – St Loys Road
35. Nos. 433 to 441 (odd) High Road
36. The Green School (at rear of former Grammar School) – Somerset Road
37. No. 2 Co-operative Workshops (former Tottenham Grammar School) Somerset Road
38. Nos. 372 to 376 (even) High Road
39. Nos. 413 (former Felvers Hall) High Road
40. Nos. 352 to 366 (even) Rawlinson Terrace & Synagogue – High Road
41. Nos. 389 & 391 (former Tottenham Library) High Road
42. No. 373 High Road, and Nos. 381 to 385 (odd) High Road
43. 363–365 High Road
44. No. 324 High Road
45. No. 310 (High Cross United Reform Church & Hall) and No. 320 (former funeral directors) High Road
46. High Cross United Reform Church Hall – Colsterworth Road
47. Tottenham Bus Garage (former Tram Shed section)
48. Holy Trinity Church Vicarage
49. Former Prince of Wales Hospital (Main Building)
50. 39 Talbot Road
51. 2–40 Talbot Road
52. 31–33 Talbot Road
53. Nos. 88 to 94 (even) Forster Cottages
54. The College of Haringey, Enfield and north East London Tottenham Centre
55. 64–79 High Steet
56. 295 High Road – No. 295 (former Jewish Hospital including front boundary wall, gates & railings) Tottenham College of Technology (original building including front boundary wall, gates & railings)
57. 289–293 High Road, St Ann's Police Station
58. No. 287 (former Fishmongers Arms Public House), Wood Green Police Station
59. Nos. 1 to 19 (consecutive) – Clyde Circus
60. Nos. 74 & 76 – Clyde Circus
61. Nos. 78 to 84 (even) – Clyde Circus
62. 1a–1b west Green Road
63. United Reform Church & Hall
64. 227–249 High Road

LOCATION:
Ashley House, Ashley Road, Tottenham

DATE:
July 2026

SCALE:
1:10,000 @ A3

FIGURE:

NORTH

MONTAGU EVANS
70 ST MARY AXE,
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Annex F: Phase 1 Geotechnical and Geoenvironmental Desk Study

Submitted as a Standalone Report

TRIUM

Appendix: EIA Methodology

Annex 1: EIA Scoping Opinion Request Report

Annex 2: Cumulative Schemes List and Map

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ANNEX 2: 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 10,000m^2 (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 1, which shows the approximate location of the cumulative schemes list in Table 1.

Table 1 Cumulative Schemes List

No.	Address	Description	Reference	Status
Tier 1 Cumulative Schemes				
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	Approved 30/06/2026
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) *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.*	HGY/2018/2223	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	HGY/2021/2304	Approved 30/08/2023 Under Construction

		E(a)) at ground and first floor; and associated access, landscaping works, cycle parking, and wind mitigation measures.		(Completion Scheduled for Summer 2027)
Consideration of Tottenham Hale Retail Park – Allocated Site				
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, 18500m^2 of Town Centre uses (Class E, F and Sui Generis), and 2800m^2 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
Consideration of Cannon Factory				
n/a	Cannon Factory	• Two blocks ranging between 8-25 storeys comprising two buildings; one including a PBSA (Sui Generis) block with a max AOD +85.575 and Hotel (Use Class C1) with a max AOD +40.050; • Sui Generis - PBSA beds – up to 450 units • Use Class C1 - Hotel R – up to 170 rooms • Up to 655m^2 (Use Class E).	n/a	n/a

Figure 1 Cumulative Schemes Map

