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Ref No: 333100157/E1/EH

Robbie McNaughter
Head of Development Management and Planning Enforcement
Planning Service
London Borough of Haringey
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225 High Road
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Dear Robbie,

ST ANN'S HOSPITAL – RESERVED MATTERS FOR PHASES 1B AND 2 PURSUANT TO HYBRID PLANNING PERMISSION (REF: HGY/2022/1833): ENVIRONMENTAL IMPACT ASSESSMENT (EIA) COMPLIANCE

This letter has been prepared on behalf of Peabody Trust, Catalyst by Design Limited and Hill Residential Limited (the 'Applicant') to support the submission of a Reserved Matters application pursuant to a Hybrid Outline Planning Permission (ref. HGY/2022/1833) in relation to Environmental Impact Assessment ('EIA') matters. The Reserved Matters submission is a "subsequent application" under the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the 'EIA Regulations'). The letter reviews the submission against the assessments and conclusions of the Environmental Statement ('ES') submitted to the London Borough of Haringey ('LBH') in May 2022. The letter confirms that no likely significant effects on the environment that were not identified at the time of the principal decision would arise. The ES submitted in support of the Hybrid Planning Application therefore remains valid for the determination of the Reserved Matters Application for Phases 1B and 2.

Background

As you are aware, hybrid planning application ref. HGY/2022/1833, which comprised outline and detailed elements, was submitted to LBH in May 2022. It was granted planning permission by LBH in July 2023. The description of the approved development is as follows:

'(1) Detailed planning permission for Phase 1A, for: (a) the change of use, conversion and alteration of seven existing hospital buildings for a flexible range of non-residential uses within Use Class E, F1/F2; (b) the demolition of other existing buildings (in accordance with the demolition plan); (c) the erection of new buildings for residential uses (Use Class C3); (d) alterations to the existing access roads and site boundaries to enable the provision of new vehicular, pedestrian and cycle accesses; (e) landscaping including enlargement of the Peace Garden; and, (f) associated car and cycle parking spaces and servicing spaces;

(2) The demolition of existing buildings and structures in Phases 1B, 2 and 3 (in accordance with the demolition plan); and

(3) Outline planning permission (with all matters reserved except for access) for Phases 1B, 2 and 3, for: (a) the erection of new buildings for residential development (Use Class C3) and a flexible range of non-residential uses within Use Class E, F1/F2; (b) provision of associated pedestrian and cycle accesses; (c) landscaping including enhancements to the St Ann's Hospital Wood and Tottenham Railsides Site of Importance for Nature Conservation (SINC); and, (d) car and cycle parking spaces and servicing spaces.'

The proposals (hereafter referred to as the 'Development') were considered to fall within Category 10(b) of Schedule 2 of the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)*¹ as an urban development project where the development exceeds 5 hectares and includes more than 150 dwellings. It was considered that likely significant environmental effects could occur and as such, an ES was prepared to accompany the planning application.

As part of this approval, a set of six individual parameter plans provide the framework for the ongoing regeneration of the Remaining Masterplan Area; and these are included as approved documents listed within the Hybrid Outline Permission Planning Condition 2 (Approved Plans and Documents). The parameter plans include:

- Access and Circulation (Parameter Plan ref: N15301-KCA-ZZ-ZZ-DR-A-01200);
- Ground Floor Uses (Parameter Plan ref: N15301-KCA-ZZ-ZZ-DR-A-01201);
- Upper Floor Uses (Parameter Plan ref: N15301-KCA-ZZ-ZZ-DR-A-01202);
- Green Infrastructure (Parameter Plan ref: N15301-KCA-ZZ-ZZ-DR-A-01203);
- Maximum Footprints (Parameter Plan ref: N15301-KCA-ZZ-ZZ-DR-A-01204); and
- Maximum Heights (Parameter Plan ref: N15301-KCA-ZZ-ZZ-DR-A-01205).

Reserved Matters Application

The Applicant is submitting a reserved matters application, the description of which is set out below. The site area is 2.39ha and a redline boundary plan is included at Enclosure 1.

'Application for the approval of reserved matters respect of appearance, landscaping, layout and scale relating to Phases 1b and 2 associated with the outline component of planning permission HGY/2022/1833 for "Outline planning permission (with all matters reserved except for access) for Phases 1B, 2 and 3, for: (a) the erection of new buildings for residential development (Use Class C3) and a flexible range of non-residential uses within Use Class E, F1/F2; (b) provision of associated pedestrian and cycle accesses; (c) landscaping including enhancements to the St Ann's Hospital Wood and Tottenham Railsides Site of Importance for Nature Conservation (SINC); and, (d) car and cycle parking spaces and servicing spaces.'

Validity of Submitted ES and Likely Significant Effects

As a result of the forthcoming Reserved Matters application for Phases 1B and 2, a review of the environmental assessments included in the ES for the hybrid application has been undertaken. The aim was to establish whether any new or amended significant effects could occur as a consequence of there being any evolved baseline conditions or due to the proposed development description of the Reserved Matters Application.

¹ *The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)* (2018 No.695)

EIA Considerations

As a subsequent application to an extant permission for EIA development, Regulation 9 of the EIA Regulations applies. It sets out the procedure for subsequent applications where environmental information has previously been provided. Regulation 9 states that:

“(2) Where it appears to the relevant planning authority that the environmental information already before them is adequate to assess the significant effects of the development on the environment, they must take that information into consideration in their decision for subsequent consent.

(3) Where it appears to the relevant planning authority that the environmental information already before them is not adequate to assess the significant effects of the development on the environment, they must serve a notice seeking further information in accordance with regulation 25.”

The section reviews the Reserved Matters application against the likely significant effects on the environment reported in the ES. The purpose of review is to demonstrate that LBH has adequate information on the likely significant effects on the environment from the outline stage and that there is no requirement to request further information under Regulation 25 of the EIA Regulations (Regulation 9 (3)).

When considering the validity of the ES, the following topics are of relevance:

- Evolution of baseline environment – as this is the basis upon which effects are assessed; and
- Likely significant effects – if they differ from those assessed at outline stage due to detailed design.

Evolution of the Baseline Environment

The environmental baseline conditions have not evolved to any measurable degree in the time since the submission of the ES in May 2022 such that new baseline data collection work would be required. The Site remains as it was in May 2022.

The phased demolition and construction was assessed in full within the submitted ES. No other material alterations to the baseline environment have occurred that would change the position upon which effects are assessed. Therefore, it is considered that the assessment of effects against the baseline conditions set out for all technical disciplines in the ES remains valid.

Validity of Likely Significant Effects

A review of the environmental topics included in the May 2022 ES, in support of the hybrid planning application for the Development has been undertaken. The aim has been to establish whether any likely significant effects not identified or identifiable at the time of the planning application's submission could now occur as a consequence of the Reserved Matters Application. The scope of the May 2022 ES comprised the following topics:

- Population and Human Health;
- Townscape and Visual;
- Archaeology;
- Built Heritage;
- Transport & Access;
- Air Quality;
- Noise and Vibration

- Biodiversity; and
- Climate Change.

ES Chapter 3 Site & Development Description described the parameters of the outline application and the detailed plans for Phase 1A. Each technical chapter assessed the parameters and, specifically, the potential development within the parameters that would lead to the “worst case” effects for that discipline. This was to ensure that any future detailed proposals coming forward within the parameters of the outline consent would not lead to greater (more adverse) effects on the environment than have been assessed at the outline stage.

The Reserved Matters application is in accordance with the outline parameters assessed in the submitted ES. The parameter plans assessed are listed on page 2 above.

Given that the Reserved Matters are in accordance with the parameters, the assessment of effects pre-mitigation, the recommended mitigation measures and residual effects remain unchanged. The findings of the submitted ES are set out below and these findings remain unchanged as a result of the reserved matters submission.

The May 2022 ES identified that the Development would result in the following significant beneficial residual effects:

- A temporary impact on employment during construction (Moderate beneficial);
- Housing delivery during operation (Moderate beneficial);
- Open and play space provision from the Development (Moderate beneficial);
- The impact of the Development on the Site and its immediate surroundings (Moderate beneficial); and
- Permanent impact on archaeological remains of Medieval and Post Medieval Assets (Moderate to minor beneficial).

The May 2022 ES also identified that the proposed development would result in the following significant adverse residual effects, all of which concern Townscape and Visual effects:

- The impact of construction on the Site and its immediate surroundings (Up to Moderate adverse);
- Impact of construction on Conservation Area Sub-Area 3: St Ann’s Hospital (Moderate adverse);
- The impact of construction on the residents of Warwick Gardens (Up to Moderate adverse);
- The impact of construction on the residents of St Ann’s Road (Up to Moderate adverse);
- The impact of construction on the visitors of Chestnuts Park (Up to Moderate adverse); and
- The impact of the Development on the residents of Warwick Gardens (Moderate adverse).

Conclusion

In conclusion, it can be seen from the information set out above that the findings and residual significant effects of the ES submitted in support of the hybrid planning application remain unchanged. LBH has sufficient environmental information on which to base a planning decision and no further information is required. If you have any questions in relation to the contents of this letter, please do not hesitate to contact me on 02074466877 or by email at ellie.holderness@stantec.com.

Yours sincerely,

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ELLIE HOLDERNESS
Senior Environmental Planner

STANTEC UK LIMITED