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Dear Ms Okeiyi,

Lordship Lane, London – 707-725 Lordship Lane, London N22 5JY: Request for an EIA Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

We write on behalf of Atri7 2 Limited (hereinafter referred to as the 'Applicant') to request an Environmental Impact Assessment ('EIA') Screening Opinion from the London Borough of Haringey (LBH) in relation to redevelopment of an area of land located at 707 Lordship Lane, Wood Green, currently occupied by Mecca Bingo ('the site'). The site is approximately 0.85 hectares (ha) and is currently occupied by a one storey building containing a bingo hall in addition to associated parking facilities.

The site location and planning application boundary are shown in **Figure 1** and **Figure 2** respectively.

The Applicant will be seeking detailed (full) planning permission for the comprehensive redevelopment of the site for Purpose-Built Student Accommodation (PBSA), residential use and amenity spaces and ancillary uses (hereinafter referred to as the 'Proposed Development'). The Proposed Development will comprise the demolition of the existing building. Further details of the Proposed Development are detailed in the 'Description of Development' section of this letter.

Application of the EIA Regulations

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)¹ ('EIA Regulations') is the key legislation relating to the requirement to consider the likely environmental effects of development projects within the planning system in England and Wales. The EIA Regulations provide screening criteria and thresholds at which certain types of development projects should be screened by a Local Planning Authority (LPA) in order to determine whether a project is an 'EIA Development'.

Regulation 2 of the EIA Regulations define 'EIA Development' as that which falls either under Schedule 1, where EIA is mandatory, or under Schedule 2, where **only development likely to have significant effects on the environment** by virtue of factors such as its nature, size or location should be

¹ Her Majesty's Stationery Office (HMSO) 2017. *The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (as amended in 2018 and 2020)*.

considered 'EIA Development.'

Types of development listed in Column 1 of Schedule 2, need to be screened to seek agreement with the Local Planning Authority (LPA) whether or not an EIA is required, based on the screening criteria set out in Schedule 3. The Proposed Development falls under the category of 'Urban Development Projects', as listed in Column 1 of Schedule 2. Therefore, for this type of development to be 'Schedule 2 Development' consideration must be given to whether the site is either:

- (a) located in a 'sensitive area' (as defined under Regulation 2 and detailed in **Appendix 1** of this letter), or
- (b) one where the relevant screening thresholds and criteria as set out in Schedule 2 paragraph 10(b) of the EIA Regulations are met or exceeded, which in this case are that:
 - i. The Proposed Development includes more than 1 hectare of urban development which is not dwelling house development; or
 - ii. The Proposed Development includes more than 150 dwellings; or
 - iii. The overall area of the Proposed Development exceeds 5ha.

When a development exceeds these thresholds, the Proposed Development needs to be screened against the criteria in Schedule 3 to determine whether environmental significant effects are likely, and whether an EIA is required.

The National Planning Practice Guidance for Environmental Impact Assessments², provides guidance to aid LPAs to determine whether a project is likely to have significant environmental effects. The Guidance states:

'Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.'

'EIA is more likely to be required where (i) the area of the scheme is more than 5 ha; or (ii) it would provide a total of more than 10,000m² of new commercial floorspace; or (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).'

Account is also to be taken of the physical scale of such developments, potential increase in traffic, emissions and noise.'

The Proposed Development is not located in a 'sensitive area' as defined by the EIA Regulations (refer to **Appendix 1**) nor does the overall site area exceed 5ha. However, as the Proposed Development will provide 76 residential units and 621 student accommodation units, consideration has been given to whether an EIA is required for this application in this request for an EIA Screening Opinion.

Information Required for Screening

To enable the LBH to provide a Screening Opinion and determine whether or not a development is an EIA Development, the EIA Regulations (6(2)) require that the following information is issued to the LPA, as the competent authority:

- (a) a plan sufficient to identify the land;
- (b) a description of the development, including in particular -

² Department for Communities and Local Government (Live Document) Planning Practice Guidance [online] Available: <http://planningguidance.communities.gov.uk/>

- i. a description of the physical characteristics of the development and, where relevant, of demolition works;
 - ii. a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- (c) a description of the aspects of the environment likely to be significantly affected by the development;
- (d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from -
- i. the expected residues and emissions and the production of waste, where relevant; and
 - ii. the use of natural resources, in particular soil, land, water and biodiversity; and
- (e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

This request for an EIA Screening Opinion includes all the above information.

Figure 1. Approximate Site Location

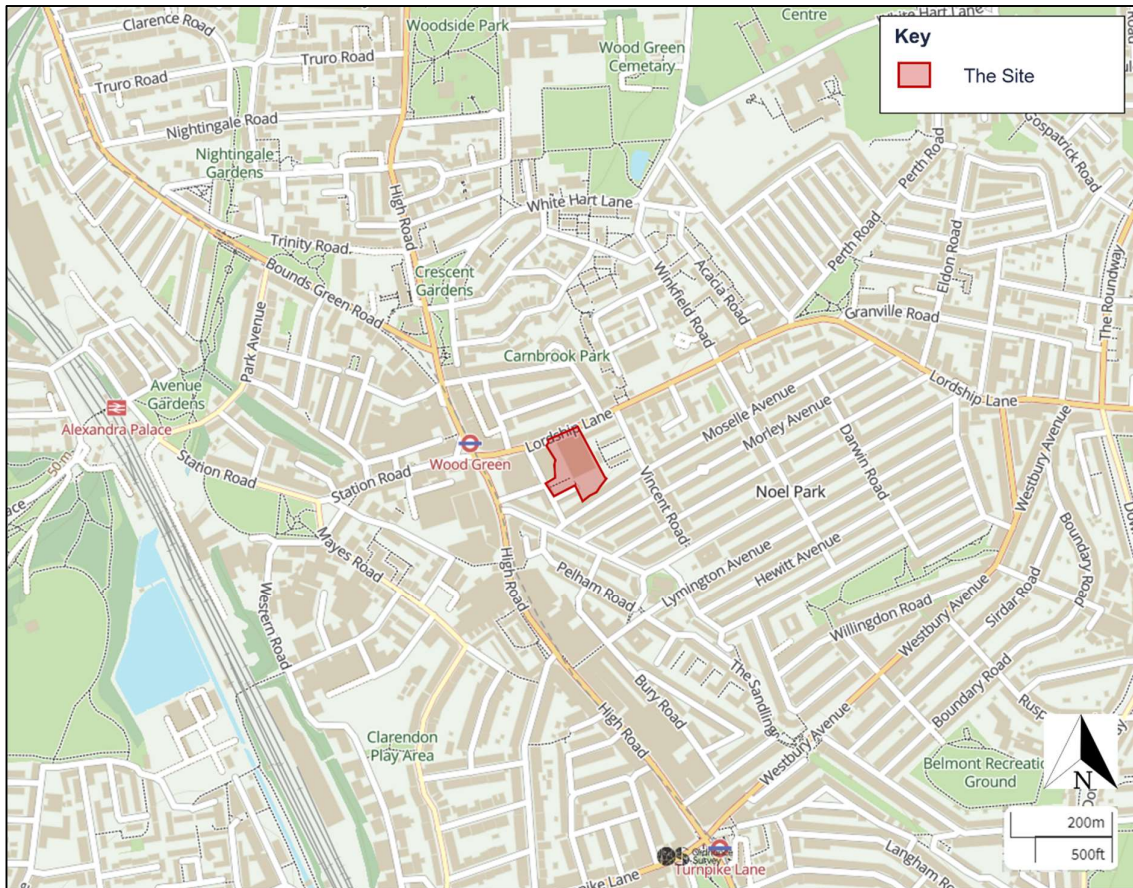
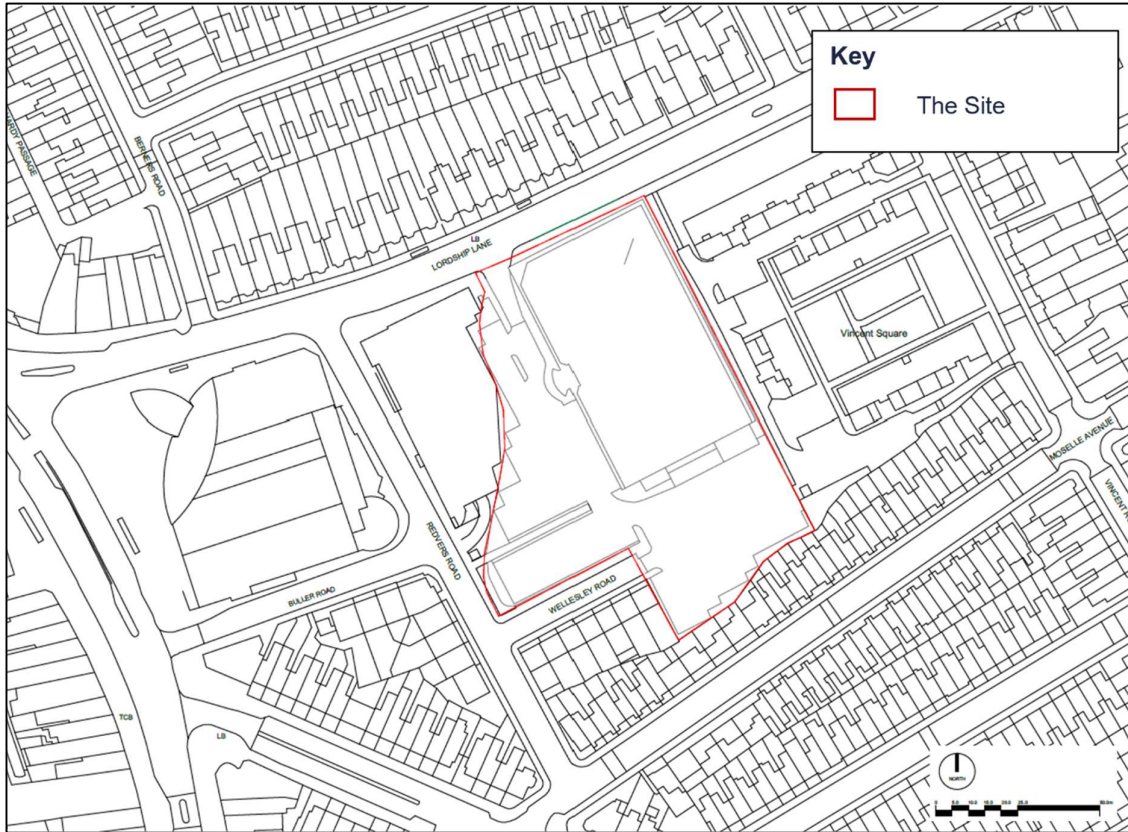


Figure 2. Site Redline Boundary

Site Location – Identifying the Land

The location of the site (centred on NGR TQ 31197 90429) is identified in **Figure 1**. The site is located in a mixed-use area including retail, commercial and residential uses. The site is irregular in shape and comprises approximately 0.85 hectares (ha) in size. The majority of the site is currently a single storey building, which is in use by Mecca Bingo as a bingo hall located towards the centre, north and east of the site, with the remainder of the site (located towards the south and west) as ancillary car parking / hardstanding. The site is bound by:

- Lordship Lane (A109) to the north of the site;
- Sultan Terrace and Vincent Square to the east of the site;
- Residential properties along Moselle Avenue to the south of the site; and
- Omnibus House and Redvers Road to the west of the site.

Areas on the south and west of the site are occupied by hardstanding parking space, as shown on **Figure 3**. The building and parking spaces are currently in use (approximately 120 car parking spaces are provided across the site). There are no listed buildings within the site's redline boundary.

Figure 3. Existing Site



Description of the Proposed Development

The Applicant will be seeking detailed (full) planning permission for demolition of the existing building and redevelopment of the site. The Proposed Development will provide 621 purpose-built student accommodation (PBSA) units along with amenity spaces and ancillary uses. In addition to the PBSA uses, the Proposed Development will deliver 76 affordable residential units (shared ownership and social rent). The Proposed Development will be split across five blocks throughout the site (Figure 4). The main block (Block A1) is to be located towards the north of the site and will form an internal courtyard.

The Proposed Development will also deliver approximately 800m² (Gross Internal Area) of flexible non-residential uses in Block A1 (Figure 4). These non-residential uses will create an active frontage through the Proposed Development which will front onto a new pocket park located towards the west of the site. The urban green space will deliver approximately 1,400m² of public realm improvements which will focus on creating additional playspace and biodiversity improvements.

In terms of massing, the Proposed Development will range from one to nine storeys with the tallest element of the Proposed Development located adjacently to Lordship Lane (A109) to the north of the site (Figure 4).

There are no existing basements and no basements proposed within the design. However, as there is an existing circa 2m level change across the site, running north to south from Lordship Lane, there is likely to be some regrading of ground to ensure level access can be achieved at entrances. Ground floor slabs will require stepping to accommodate, with the aim being to limit excessive cut and fill.

Key enhancements will be incorporated across the site such as inclusion of external amenity and landscaping, active ground floor with urban greening and improved cycle provision. The public realm strategy will connect the different blocks throughout the site.

The demolition and construction of the Proposed Development (including all renovations and extensions) is likely to take approximately 3 years with completion in 2027.

Figure 4. The Proposed Development and Surroundings – Indicative Storey Heights and Layout



Planning Application Supporting Documents

The Applicant is proposing to submit a suite of environmental reports to comprehensively assess the environmental impacts that could arise from the Proposed Development and to satisfy planning requirements and allow the LBH to take a robust decision on the acceptability of the proposals.

The Applicant has commissioned the following stand-alone reports that would accompany the planning application:

- Acoustic Report
- Air Quality Assessment;
- Arboricultural Report;
- Archaeological Desk Based Assessment;
- Preliminary Ecological Impact Assessment (including Biodiversity Net Gain Assessment);
- Daylight and Sunlight Assessment;
- Flood Risk and Drainage Assessment;
- Fire Statement;

- Student Needs Assessment;
- Socio Economic Assessment;
- Townscape, Visual Impact and Heritage Assessment (TVIHA);
- Statement of Community Involvement;
- Transport Assessment (including Draft Travel Plan);
- Site Waste Management Plan;
- Phase I Desk Study and Phase II Site Investigation Report including Unexploded Ordnance (UXO) Survey;
- Design and Access Statement;
- Inclusive Design Statement;
- Landscape Statement including Urban Greening Factor calculation;
- Energy Statement;
- Sustainability Statement;
- Whole Life Carbon Assessment and Circular Economy Assessment; and
- Affordable Housing Statement.

Screening of the Proposed Development

A review of the likelihood for significant environmental effects has been undertaken by Trium Environmental Consulting LLP (Trium) and relevant technical specialists and is presented in **Appendix 2** of this letter. Environmental aspects have been considered in respect of the likely demolition/construction works, and once the Proposed Development is complete and in operation. In addition, and in line with Regulation 6(2)(e), information has also been provided on '*any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment*', as relevant.

No likely significant effects have been established to arise as a result of the Proposed Development as detailed in the review undertaken in **Appendix 2**. Technical reports will be prepared to support the Planning Application as necessary. Although environmental impacts are expected to occur during the Proposed Development's implementation, they would be managed by adopting good practice and controls, such that sensitive receptors would not be permanently disrupted or harmed. As can be seen from **Appendix 2** of this letter, an analysis of the likelihood for significant effects has been undertaken and the results and conclusion of this work demonstrate that, with an appropriate level of mitigation applied where relevant, is unlikely to result in significant adverse effects on the environment.

Conclusion

In summary, the Proposed Development is not considered to result in any likely significant environmental effects during demolition and construction works and once completed and operational and an EIA is therefore not required.

In accordance with Regulation 6(5), should you consider that you have not been provided with sufficient information to adopt a screening opinion you should notify us in writing on points on which you require further information. In accordance with Regulation 6(6)(a), the LBH should adopt their EIA screening opinion within 3 weeks beginning with the date of receipt of the request for an EIA screening opinion.

We trust that the information presented within this report is sufficient for the LBH to produce and issue an EIA Screening Opinion which agrees that significant effects are not likely as a result of the Proposed

Development does not constitute 'EIA Development' within three weeks from the date of this letter.

Kind regards,



Vanessa Thorpe

Partner

For and on behalf of Trium Environmental Consulting LLP

Appendix 1: Supporting Note

Appendix 2: Consideration of the Environment

Appendix 1: Supporting Note

Sensitive Area Definition

Definition of 'sensitive area' within the EIA Regulations (within Regulation 2 – 'Interpretation') -

"sensitive area" means any of the following—

- (a) land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981(23);
- (b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949(24);
- (c) the Broads(25);
- (d) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage(26);
- (e) a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979(27);
- (f) an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000(28) as confirmed by the Secretary of State;
- (g) a European site."

Appendix 2: Consideration of the Environment

The potential for the Proposed Development to have significant environmental and socio-economic effects has been considered with regard to Schedule 3 ('Selection Criteria for Screening Schedule 2 Development') of the EIA Regulations. A review of the potential for significant environmental effects has been undertaken by Trium in conjunction with the relevant project technical specialists. Environmental aspects have been considered in respect of the proposed demolition and construction works, and once the Proposed Development is complete and in operation. A summary of these considerations is included below.

In addition, and in line with Regulation 6(2)(e) information has also been provided in the section below on *'any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment'*, as relevant.

A Construction Environmental Management Plan (CEMP) will be produced prior to works starting, in response to a planning condition.

Archaeology (Buried Heritage)

An archaeological desk-based assessment (DBA) has been undertaken by OSA On Site Archaeology and has informed the consideration of potential effects on archaeological remains as a result of the Proposed Development. A 500m study area was considered to adequately characterise the likely archaeological conditions within the Site. The DBA will be submitted in support of the planning application. Initial findings are summarised below.

The site has a very low potential to contain archaeological evidence from the majority of the prehistoric period, the Roman and early medieval periods. The potential for the palaeolithic period is slightly higher, due to the discovery of occasional flint artefacts of this period in the area. The site lies outside the edge of the late medieval to post-medieval village of Wood Green, which is identified as an Archaeological Priority Area (approximately 150m to the west of the site). Medieval and post-medieval features are likely to be related to agricultural land use, although there may be some potential for ribbon settlement along Lordship Lane. Development of the site during the late 19th to 20th century will have resulted in some truncation of any earlier archaeological features.

There are no Scheduled Monuments and no Registered Battlefields or Parks and Gardens within the 500m Study Area.

There are eight Listed Buildings within the 500m Study Area. None of the listed buildings are directly visible from the site due to presence of other structures.

Potential for Likely Significant Effects and Design Measures

As yet full design details are not finalised but given the site's location and proposed heights of buildings it is likely that some piled foundations will be required. If piling is undertaken during construction, it would have a significant impact (prior to mitigation) on any surviving archaeological remains if present, removing them entirely. No basement excavation is proposed; however, there is an approximately 2m level change across the site, running north to south from Lordship Lane, so the proposal anticipates some regrading to ensure level access can be achieved at entrances. Ground floor slabs will require stepping to accommodate, with the aim being to limit excessive cut and fill. An archaeological investigation by non-intrusive and/or intrusive means thus may be required within the site where any associated infrastructure works such as ground breaking for insertion of/upgrading utilities as well as any groundbreaking required for landscaping across the site in its entirety.

If any potential adverse effects are identified, an appropriate mitigation strategy would then be

considered with the aim of reducing or offsetting the effect. The nature and, type of archaeological mitigation required will depend on design proposals and should be tailored to the relative amount of ground-breaking required (which would be understood at the post-planning detailed design stage) and may form a condition of any approved planning application. Further details of any proposed mitigation will be provided within the DBA submitted in support of the planning application.

Measures to offset adverse effects on archaeology would normally consist of design adjustments, to allow significant resources to be protected and retained (preservation in situ) or, where this is not necessary or feasible, investigation and recording before and during development, with dissemination at an appropriate level (preservation by record).

As archaeological remains and heritage assets are an irreplaceable resource it is generally considered as standard practice within the planning system to implement mitigation measures in order to offset any level of adverse effects on archaeological remains or heritage assets, including minor adverse. This is to ensure that finite and irreplaceable remains are not removed/lost without record. The level of mitigation proposed is, in each case, proportionate to the significance of the asset being affected.

All impacts on archaeology would occur only during the demolition and construction phase, with the most intrusive works likely to be those with the greatest potential for impact.

Conclusion

The potential for the survival of medieval and early post-medieval archaeological features will have been significantly influenced by previous development of the site. The design of the Proposed Development is yet to be finalised, however, any impact on archaeological remains would be direct, adverse and permanent, arising from demolition, site preparation, re-grading / foundation construction and landscaping.

Given the relatively low potential for significant archaeology to be present, due to the location of the site being outside the APA and to the likely truncation by 19th and 20th century developments, any further archaeological investigation, if required, should be secured through appropriate worded planning conditions attached to any future planning permission.

Extensive remains of high significance are not, however, anticipated, and it is considered that the potential adverse effects of the scheme on the archaeological resource are not considered to be significant and not of a magnitude to require EIA.

An Archaeological Desk Based Assessment will be submitted to support the planning application.

Ecology and Biodiversity

A Preliminary Ecological Appraisal (PEA) has been undertaken on the site and will be submitted in support of the planning application. The PEA Survey was carried out in accordance with best practice in June 2023 to identify the habitats present on site, any ecological constraints, and the potential for the site to support protected species, and included an ecological desk study, habitat survey and Preliminary Roost Assessment of the building (to determine bat suitability).

The site does not form part of any statutory or non-statutory nature conservation site. One Statutory Site, namely Alexandra Palace & Park Local Nature Reserve (LNR), and 27 Non-Statutory Sites, all Sites of Importance for Nature Conservation (SINC) are located within a 2km radius of the site. Potential adverse effects are not anticipated for these sites as a result of the Proposed Development due to their distance from and lack of ecological connectivity with the site, and the nature of the Proposed Development.

The habitat survey was carried out on the site on 23 May 2023 to map habitat types and included incidental observations of protected and/or notable species, and the potential for such species to occur

on site and in the surrounding landscape where relevant.

All habitats within the site were assessed as having negligible intrinsic ecological value. The habitat survey identified the presence of the invasive, non-native species *Cotoneaster horizontalis*, which will need to be removed.

The Preliminary Roost Assessment confirmed that the buildings and surrounding trees have negligible potential for bats.

The habitats around the periphery of the site offer some potential for foraging and breeding birds.

No other potential for protected species was identified.

Potential for likely Significant Effects and Design Measures

Working under the principle of 'net-gain' as supported by planning policy, any habitats to be removed will be compensated for through creation of compensatory replacement habitat or equivalent or greater value. All habitats present on site are of limited ecological value and the Proposed Development will include improvements to the existing public realm and landscaping, to achieve biodiversity net gain. The PEA submitted with the planning application will also include a Biodiversity Net Gain assessment.

A number of measures are recommended within the PEA to both avoid or mitigate the impact on ecology and biodiversity during and post construction. The below recommendations have been made:

- Avoidance of site clearance and/or construction work during the breeding season (March to August inclusive). If this cannot be achieved, a check for nesting birds by a qualified ecologist should be undertaken no more than 48hrs prior to works. If the presence of an active nest is subsequently confirmed, the ecologist would advise on appropriate protective measures.
- It is recommended that a Precautionary Working Methods Statement (PWMS) is produced and followed to ensure the spread of invasive non-native species is avoided. This document will also detail the required treatment and control measures to be undertaken prior commencing the works.
- In the unlikely event that a protected or notable species is found during the demolition and construction of the Proposed Development, all works should stop, and an ecologist should be contacted.

A number of opportunities are highlighted in the PEA to enhance the ecological value of the site within the Proposed Development as follows:

- Bird boxes, including a variety of designs, such as 45mm entrance boxes, 32mm entrance boxes, sparrow terraces, owl/kestrel boxes and swift boxes/house martin cups on trees and the installation of integrated bird bricks directly into the brickwork of new buildings/structures;
- Bat boxes including for a variety of species and for a variety of seasons, to be installed on retained mature trees and use of integrated bat boxes directly into the brickwork of new buildings and structures;
- Creation of insect and invertebrate houses/hotels, or management of retained standing and fallen deadwood; and
- Planting to compensate for the loss of existing trees and enhance the site further, including native trees, shrubs and wildflowers of local provenance which naturally occur within the local area. To include berry, pollen and nectar producing species.

Conclusion

The findings of the PEA conclude that the site is of low ecological value for protected species and the habitats on-site, and that there are no significant ecological constraints to the development. Mitigation

recommendations have been made to ensure ecological features are not impacted. With appropriate mitigation measures and additional survey/assessment the ecological receptors identified in this report would not be adversely affected by the development

Based on the findings presented in the PEA, which will be submitted in support of the planning application, alongside the measures proposed to avoid potential impacts that could arise during construction works, it is considered that the Proposed Development is unlikely to generate any significant ecological effects. Additionally, through the appropriate design, the Proposed Development could provide opportunities for ecological enhancement, which would benefit the site and surrounding.

Health

The site is located within the Noel Park ward of the LBH, one of 21 wards in the borough. It is also located at the border of Woodside ward.

The health of people living within the LBH is generally better than that compared with the England average. The public health outcomes framework ³ identifies the following health outcomes (of relevance to the Proposed Development) that are significantly worse for the LBH in comparison to the England average:

- Healthy life expectancy for males at 65;
- Adults with a learning disability who live in stable and appropriate accommodation;
- The percentage of the population aged 18 to 64 who are in receipt of long term support for a learning disability that are in paid employment;
- The percentage of the population who are in contact with secondary mental health services and on the Care Plan Approach that are in paid employment;
- Killed and seriously injured casualties on England's roads;
- Violent crime – hospital admissions for violence;
- Under 75 mortality rate from cardiovascular diseases;
- The rate of complaints about noise
- Social isolation and loneliness; and
- Children in low income families.

Potential for Likely Significant Effects and Design Measures

The scale of the demolition and construction works will not generate significant effects in respect of health considerations either during the works or on completion and occupation of the Proposed Development.

The potential impact to human health from the demolition and construction works, for example potential impacts to the respiratory system from excessive dust, is considered low. Suitable health and safety and environmental management measures, including measures to minimise dust deposition and excessive noise levels, will be implemented during the demolition and construction of the Proposed Development to reduce this potential health risk and secured through the Construction Environmental Management Plan. No other health related metrics are considered likely to be subject to potential noticeable impacts during the demolition and construction stage, that could result in likely significant effects.

Consideration has also been given to the operational health implications of the Proposed Development

³[Public Health Outcomes Framework - Data - OHID \(phe.org.uk\)](https://publichealthoutcomesframework.org.uk/data)

under a number of topics considered below, including air quality, noise and vibration, daylight, sunlight, solar glare and overshadowing and wind microclimate. The provision of open space within the Proposed Development, in addition to the provision of improved cycle facilities, will promote use of outdoor space, community interaction and activity. No likely significant effects have been identified (with mitigation set out in the sections below), and as such no likely significant operational related health effects are likely.

Conclusion

Whilst the Proposed Development will likely result in beneficial health effects as a result of the provision of enhanced public realm, the effects are not considered to be significant.

An Air Quality Assessment and Noise Impact Assessment will be prepared and submitted in support of the planning application in line with LBH requirements.

Socio-Economics

The site is located within the Noel Park ward of the borough, one of 21 wards in the LBH. It is also located at the border of Woodside ward. The area to the west of the site, including the site, is identified as a growth area (Wood Green Growth Area) and a district centre (Wood Green Metropolitan Centre) for the borough in the LBH's Local Plan. The site is also designated by the Site Allocation SA9: Mecca Bingo, allocated for "redevelopment of bingo hall for town centre uses with residential above"⁴. The LBH's policy states that *"This site represents an underutilised opportunity in a highly accessible town centre location. There is scope for comprehensive redevelopment to bring new residential development into the town centre with a town centre frontage onto Lordship Lane with a significant reduction in surface car parking."*

The nearest GPs to the site are Staunton Group Practice, located approximately 390m northwest of the site, and Stuart Crescent Health Centre, located approximately 400m northwest of the site. Both GPs are currently accepting new patients. The nearest primary schools to the site are Noel Park Primary School (currently over capacity), located approximately 315m southeast of the site and St. Michael's Church of England School (which has some capacity), located approximately 415m northwest of the site. The nearest secondary schools to the site are Heartlands High School (currently over capacity), located approximately 700m to the west of the site and Mulberry Academy Woodside, located approximately 775m northeast of the site (data on capacity is not available).

The overall employment rate in the LBH is relatively high and the economic inactivity rate relatively low in comparison with London; and England - employment within the LBH (2021/22) is lower than that of both London as a region and England at 76.5% compared with 75.2% and 75.4% respectively⁵.

The LBH is higher than the London and England averages for deprivation with 28% of people being deprived in the LBH compared to the average of 21.8% in London and 21.7% in England⁶.

Potential for Likely Significant Effects and Design Measures

The scale of the demolition and construction works will not generate significant effects in respect of socio-economic considerations either during the works or on completion and occupation of the Proposed Development. During demolition and construction, jobs shall be created, but the number in

⁴ London Borough of Haringey, 2017. Site Allocations DPD. [url:

https://www.haringey.gov.uk/sites/haringeygovuk/files/final_haringey_site_allocations_dtp_online.pdf]

⁵ Public Health England (2023); Local Authority Health Profiles, Haringey. Accessed online 01.11.2023. [url:

<https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/3007000/pat/6/par/E12000007/ati/301/are/E09000014/yr/3/cid/4/tbm/1>]

⁶ Public Health England (2023); Local Authority Health Profiles, Haringey. Accessed online 01.11.2023. [url:

<https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/3007000/pat/6/par/E12000007/ati/301/are/E09000014/yr/3/cid/4/tbm/1>]

the context of the London labour pool will not be significant.

Once the Proposed Development is complete and occupied, considerations relate to job creation, local spending, provision of student accommodation, housing supply and public realm / amenity space. When considering the increase in scale of the Proposed Development, compared with the existing site, and the proposed uses, additional employment opportunities would be created through the proposals. However, whilst the effect of the Proposed Development would be beneficial on provision of housing and student accommodation, employment provision and associated spending generated, it is not deemed significant in the context of the wider LBH and Greater London Area. Additionally, whilst the Proposed Development will improve the public realm across the site, given the scale of the public realm proposed the effect is not considered to be significant. It is anticipated that the CIL payments for the Proposed Development will contribute towards upgrades to schools' capacity in the LBH.

Conclusion

Whilst the Proposed Development will likely result in beneficial socio-economic effects as a result of the provision of additional employment floorspace, housing provision and enhanced public realm, the effects are not considered to be significant.

Townscape, Visual and Built Heritage Impact Assessment

The consideration of potential impacts on townscape, built heritage and visual impact has been undertaken by The Townscape Consultancy (TTC).

Current Baseline Conditions

The Site

The site is located at 707-725 Lordship Lane, on the south side of the road. Wood Green Station is approximately 150 m west of the Site.

The site currently houses a warehouse style Mecca Bingo premises, which takes up around two thirds of the site area. The existing site boundary takes up a whole city block, including the piece of Wellesley Road which now terminates at the southwestern boundary of the site.

Bordered to the north by Lordship Lane, the east by the private roads within the Vincent Square housing blocks off Vincent Road, to the west by private access to the rear of the site and the adjacent Omnibus House on Redvers Road. To the south of the site, the boundary borders the rear gardens of Moselle Avenue, and cuts across the short access road of Wellesley Road.

Site visits have been undertaken by TTC in January, May, and October 2023. As a result of these site visits, 13 townscape views have been identified in the scope agreed with the LBH as well as a study area of a 250m radius to identify relevant heritage assets. The scope of assessment has been informed by survey of the site and surrounding area, 3D context model testing and a Zone of Theoretical Visibility (ZTV) produced by visualisation specialists EB7.

Heritage Context

The site does not lie within a conservation area (CA) but sits adjacent to the boundary to the Noel Park CA to the south of the site. It also doesn't contain any listed buildings, statutory or local. There are several Heritage Assets (HAs) in the area around the site, as described below. Those HAs considered as part of this Heritage Assessment comprise Listed Buildings (LBs), Conservation Areas (CAs), and Locally Listed Buildings (LLBs). No Scheduled monuments lie within a radius of 250m of the site (the study area defined for this assessment).

Haringey Council's 'Noel Park Conservation Area Appraisal and Management Plan' states that Noel Estate is located almost at the heart of Wood Green, around halfway between Highgate and Tottenham. The area forms a rough triangle, with Lordship Lane to the north and the northeast, Wood Green High Road to the west and Westbury Avenue to the south and south-east.

The following assets are within the closest proximity of the site and will be assessed as part of the TVIHA for the planning application:

- Top Rank Club (Grade II*);
- Wood Green Station (Grade II);
- Church of St Mark, Noel Park (Grade II);
- Parish Hall to Church of St Mark (Grade II);
- 203 High Road, The Nag's Head Public House (locally listed);
- 22 Pellatt Grove (locally listed);
- Noel Park Conservation Area;
- Trinity Gardens Conservation Area;
- Wood Green Common Conservation Area;
- Trinity Gardens Conservation Area; and
- Wood Green Common Conservation Area.

There are no relevant above ground scheduled monuments in the context of the site. The site does not contribute positively to the setting of any of the heritage assets identified within the study area.

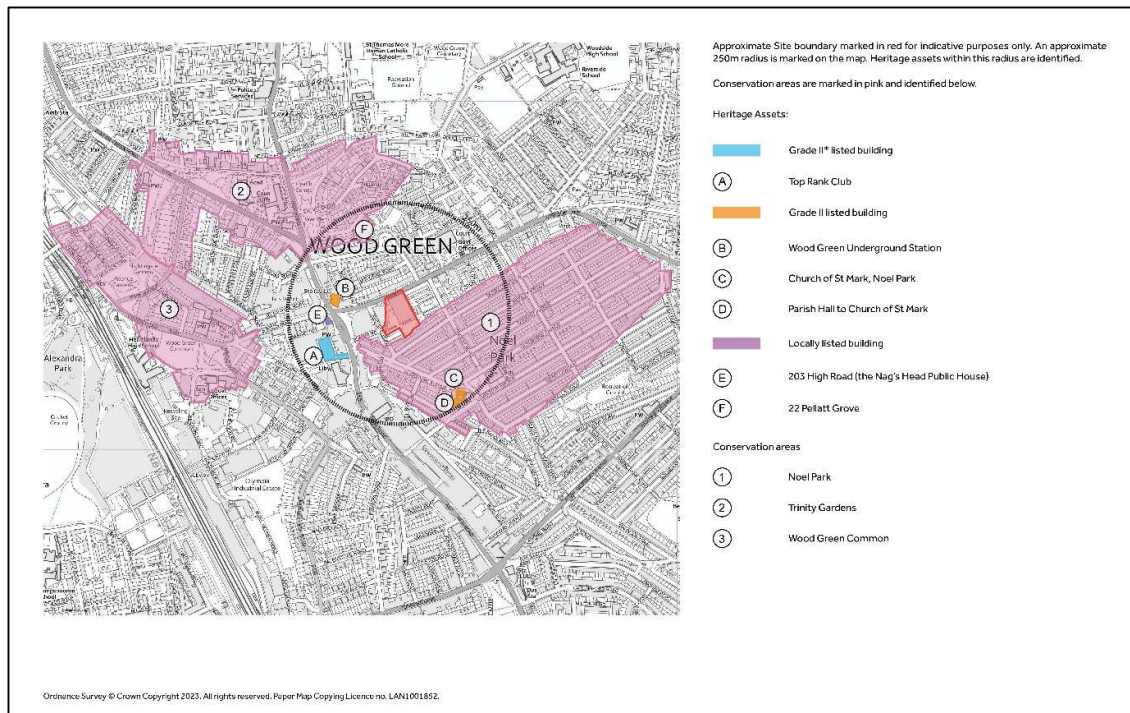
Townscape Character

The site is located on the south side of Lordship Lane, close to the central urban hub and emerging townscape of Wood Green centre. About 150m west of the site is Wood Green Station (Grade II listed), approximately 500m to the west is Alexandra Palace rail station, over 500m to the south is Turnpike Lane underground station and 0.8km to the south west is Hornsey rail station. The site sits within a key area, bridging the central boroughs of London with the more northern boroughs following the A10 north and out of the city. Further to the east are the Walthamstow Wetlands and to the west and south, Alexandra Park and Palace, Highgate Wood, Kenwood House and Hampstead Heath.

There is a mixed urban grain surrounding the site, ranging from commercial, retail and leisure, as well as smaller scale residential with ground floor retail units. Generally, to the west towards the town central junction of Wood Green, the scale and height of the buildings fronting the primary locations along the main roads are larger and taller, but this is seen more so to the south of the junction, with large retail, leisure and warehouse uses being found near the main arterial roads. To the north, there are exceptions to the low residential landscape in the form of Wood Green Crown Courts, Morum Hospital and Haringey Council offices at Alexandra House, but much of the townscape is lower. Immediately surrounding the site to the north, east and south are finer grain residential streets of terraced houses, interspersed with more modern residential blocks of flats.

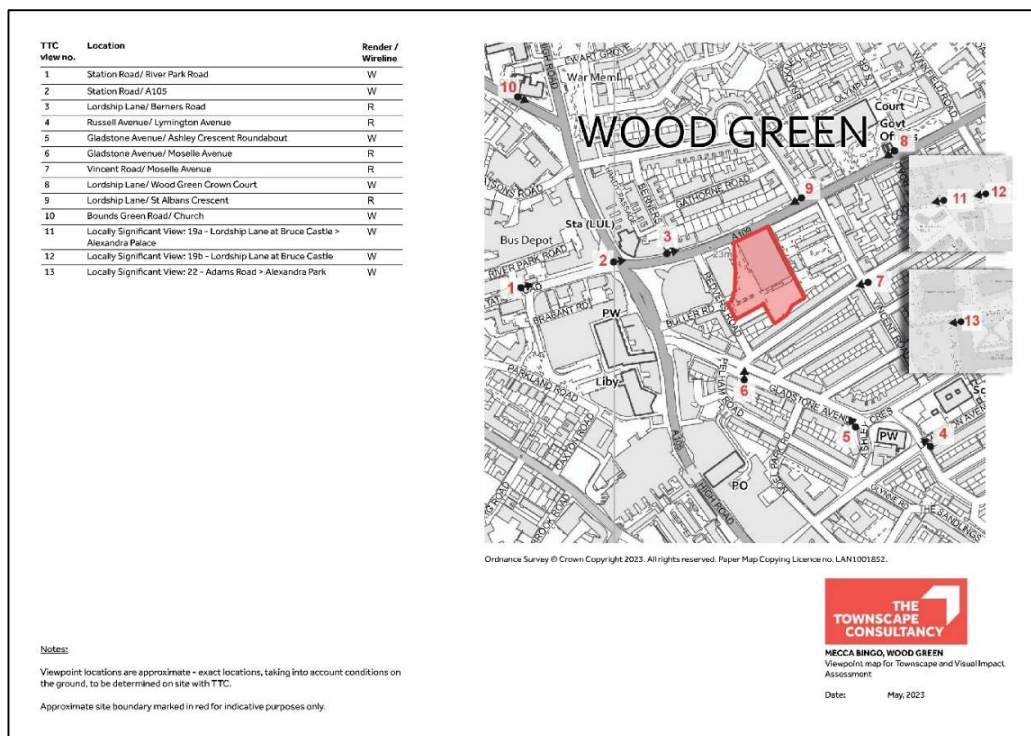
These houses and surrounding residential street of varying quality and character, provide a backdrop to the site and a contrasting scale to the larger higher rise buildings to the west in the commercial centre. Larger scale buildings include Omnibus House, Vue Cinema, Haringey Council Buildings and Alexandra House, sitting around the crossroads. These buildings contrast with the residential scale and highlight the location of the site as a mediator between the large-scale development within the commercial heart of Wood Green, and the smaller scale of the residential streets and neighbourhoods.

Figure 5. Site and Townscape Surroundings



The viewpoint map shown in Figure 6 below outlines the 13 views agreed with LBH to date and set out the scope of views to assess visual impacts to be included in the TVIHA. Locally protected views have been considered as part of this scoping exercise and those relevant to include are LSV 19a, 19b and 22.

Figure 6. Views Assessed in the THVIA



Potential for Likely Significant Effects and Design Measures

The Proposed Development would rise to a maximum height of up to nine storeys. The height would not be dissimilar to that of recently completed and emerging buildings situated in the immediate and wider locality i.e., broadly consistent with the existing and emerging townscape and visual character of the surrounding area. The planning application will be supported by a TVIHA, the key issues to be addressed by the THVIA will be:

- The effect of the Proposed Development on views within the local and wider area;
- The effect of the Proposed Development on townscape character; and
- The effect of the Proposed Development on the setting of above-ground built heritage assets (excluding archaeology).

The extent and magnitude of change caused by the Proposed Development would be limited in respect of townscape and views. There is some potential for significant environmental effects in respect of short to medium range views - as would likely be the case for all but the smallest developments in views at such distances. It is anticipated that these effects would not extend much beyond the local area around the site.

Ultimately the provision of a new building as part of the Proposed Development would have the potential to alter and improve the existing townscape character and quality of the site as well as the surrounding townscape study area. It is considered it will be an enhancement to the heritage assets to the south and west of the site, through its high-quality architecture. Therefore, significant effects on the townscape and heritage assets are considered unlikely.

In respect of heritage, there is the potential for some environmental effects due to the location of heritage assets within the 250m radius of the site. It should be noted that large scale modern development is part of the wider context in which these are experienced today, and therefore potential for significant effects is considered limited. It is expected that the Proposed Development would not cause harm to any heritage assets through a change in their setting. This will be as a consequence of replacing the existing low-quality building with a scheme of high-quality architecture and urban design, which will open the site up to its surroundings and engage positively with Lordship Lane, Wellesley Road, Redvers Road and the Noel Park CA.

Nonetheless, a THVIA would be produced as a stand-alone report and this would consider the effect of the Proposed Development on a range of views, areas of townscape around the site, and the settings of aboveground heritage assets in the local area. The TVIHA will include a range of accurate visual representations of the proposed Development (produced by EB7, a specialist visualisation company). The THVIA will be undertaken in accordance with the Townscape Consultancy's methodology which is written in line with planning legislation, policy, and guidance.

Relevant planning policy and guidance:

- National Planning Policy Framework (2021)
- Planning Practice Guidance, last updated (June 2021)
- The National Design Guide (2019)
- The London Plan 2023
- Haringey Local Plan: Strategic Policies (2013 with 2017 alterations)
- Urban Character Study, LB Haringey (2015)
- The Setting of Heritage Assets: Historic England: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) December 2017

- Historic England Advice Note 4 - Tall Buildings (2015)

The demolition and construction works will require equipment on-site and, whilst there will be some indirect visual impact on built heritage and visual receptors because of the works, the impacts will be temporary. Effects on visual receptors and the surrounding townscape will be generated by the visibility of the construction works, and although they will likely be adverse, they will be temporary.

The Proposed Development's massing is in keeping with existing and emerging buildings in the site surroundings and will be designed with a focus on design quality, in the context of townscape and visual sensitivities. Throughout the design process, there has and will be further discussions with the LBH through pre-application planning meetings, to consider the design of the Proposed Development in the context of townscape and heritage aspects. The project team have also undergone review by the Haringey Quality Review Panel.

Conclusion

To conclude, in view of the above, significant effects on the townscape and heritage assets are considered unlikely and it is deemed that the Townscape, Heritage and Visual Impact Assessment would not require an EIA; however, the effects of the Proposed Development will be assessed in a THVIA, to be submitted alongside the planning application.

Traffic and Transport

The Proposed Development comprises the demolition of a Mecca Bingo, to form a mixed-use scheme comprising of predominantly student residential use with the provision of affordable homes. In this context, the site has an extant trip generation potential which will serve to offset the relative effect of the Proposed Development – particularly given the Proposed Development is non-car. The current Mecca Bingo Hall accommodates 2,120 seats (540 tables) with an associated car park of 120 spaces. Consequently, the trip generation potential of the extant use has been determined by reference to the industry standard database TRICS (version 7.10.3) and is set out below in Figure 7.

Figure 7. Trip Generation Potential of Existing Mecca Bingo

Time Period	Trip Rates			Trips			
	Arrivals	Departures	Two-Way	Arrivals	Departures	Two-Way	Parking Accumulation
09:00-10:00	0.001	0.001	0.002	2	2	4	0
10:00-11:00	0.009	0.005	0.014	19	11	30	8
11:00-12:00	0.012	0.008	0.02	25	17	42	17
12:00-13:00	0.018	0.009	0.027	38	19	57	36
13:00-14:00	0.014	0.005	0.019	30	11	40	55
14:00-15:00	0.003	0.004	0.007	6	8	15	53
15:00-16:00	0.013	0.029	0.042	28	61	89	19
16:00-17:00	0.009	0.017	0.026	19	36	55	2
17:00-18:00	0.019	0.009	0.028	40	19	59	23
18:00-19:00	0.06	0.025	0.085	127	53	180	98
19:00-20:00	0.016	0.006	0.022	34	13	47	119
20:00-21:00	0.005	0.01	0.015	11	21	32	108
21:00-22:00	0.017	0.061	0.078	36	129	165	15
22:00-23:00	0.009	0.013	0.022	19	28	47	6
23:00-24:00	0	0	0	0	0	0	6
Daily Trip Rates:	0.205	0.202	0.407	435	428	863	13

The site is connected via a well-formed and extensive network of footways that provide connectivity to the nearby bus stops, retail, and university campuses which future residents will likely need to access

on a daily basis. The site is located within an area of PTAL rating 6a/6b⁷. The forthcoming Transport Statement will assess the accessibility of the site in detail, with the type and number of amenities accessible on foot and bicycle considered.

Wood Green Underground Station is situated approximately 150m west of the site. The station provides Piccadilly Line services to Cockfosters in the north, central London (Leicester Square, Piccadilly Circus), and Uxbridge and Heathrow Airport in the west. The site is also located approximately 850m east of Alexandra Palace rail station, served by the Great Northern railway, which provides services between King's Cross, Moorgate, Cambridge, King's Lynn and Peterborough.

Vehicular access to the site is achieved from Lordship Lane located along the northern boundary of the site. There are several bus stops located in proximity to the site. The nearest bus stops are located along Lordship Lane directly north of the site (stops F, E and V) and on Station Road (stops A and B) and along the A105 (stops C, D, G and H), approximately 150m west of the site. servicing bus routes 29, 67, 123, 141, 144, 184, 221, 230, 232, 243, 329, N29, N91, W3, W4, to destinations such as Alexandra Palace, Waterloo Station, London Bridge, Trafalgar Square, Dalston Junction, Finsbury Park Station and Edgware Station.

A Transport Assessment will be prepared and submitted in support of the planning application.

Potential for Likely Significant Effects and Design Measures

It is expected that there will be an increase in the number of Heavy Goods Vehicles (HGVs) on the surrounding road network - accessing the site during the demolition/construction phase, bringing material to/from the site which may lead to adverse effects on the road network. The increase in vehicles is likely to lead to temporary adverse effects on the A109-Lordship Lane; however, the anticipated numbers are not considered to be substantial in respect of volume or to cause capacity or safety issues on the network.

It is considered that any adverse effects can be mitigated through a CEMP and Construction Logistics Plan (CLP) to control and manage traffic movements – which will form part of a standard planning condition. The CEMP/CLP will give careful consideration to the location and traffic management associated with facilitating physical deliveries and waiting areas. No materials will be stored on the public highway. All deliveries will take place within the site. With the implementation of standard mitigation measures, no significant effects are anticipated.

The Institute of Environmental Assessment (IEMA) guidelines, set out several potential environmental effects relating to highways and transport considerations which potentially require the assessment of severance, delay (driver, pedestrian, cycle, public transport), amenity, fear and intimidation, accidents and safety and hazardous loads. It is acknowledged that the vehicles associated with the demolition/construction works may have adverse effects on severance, delay, amenity, fear and intimidation, accidents and safety and hazardous loads, due to increased HGVs on the road network. Whilst adverse, these effects will be temporary, and the vast majority of the movements will take place on the main road network. Management measures would be put in place to minimise disruption as far as reasonably possible and agreed with the LBH through the CEMP/CLP. Therefore, it is not likely that any of the construction related effects will be significant.

There will be no private car parking provision on-site during the operational phase of the Proposed Development with occupants and employees to utilise sustainable modes of transport given the accessibility to nearby public transport modes. The development proposals afford up to 11 disabled

⁷ PTAL ratings, which are ranked from 0 (worst) to 6b (best), reflecting the availability and proximity of public transport modes to the site

parking spaces, with the quantum to be determined within the forthcoming application. Cycle parking provision will be improved across the site.

As such, the development proposals will constitute the removal of vehicular trips (as set out in Figure 7 above) on the surrounding highway network given the site currently comprises a Mecca Bingo Hall which has an existing trip generation. This will be set out in detail in the forthcoming Transport Statement.

With respect to the local public transport network, additional multi-modal trips will occur as a result of the Proposed Development, including the new commercial uses. There would be sufficient capacity on the network to accommodate these new movements. Significant effects on the public transport network are therefore not anticipated.

Other vehicle trip generating activities associated with the operation of the Proposed Development will be delivery and servicing vehicles. Management of trips associated with servicing and delivery activities, to minimise adverse effects, will be addressed through a Draft Delivery and Servicing Plan addressing both retail and commercial deliveries and collections, which will be submitted as part of the planning application. On this basis, effects associated with delivery and servicing trip generation are therefore not likely to be significant.

The IEMA guidelines consider a number of different elements relating to operational transport impacts, including amenity, fear and intimidation, accidents and safety, severance, delay, and hazardous loads. It is not considered that the Proposed Development once operational will lead to significant effects on these elements. Significant traffic and transport effects during the operation of the Proposed Development are therefore not considered to be likely.

Conclusion

With the implementation of the above mitigation measures detailed during demolition, construction, and operation and given that the Proposed Development will not provide any on-site car parking once operational, no likely significant effects are anticipated to occur.

A Transport Assessment/Transport Statement and Draft Travel Plan will be submitted in support of the planning application. It is anticipated that a CLP will be conditioned as part of any planning permission.

Air Quality

The Proposed Development comprises the introduction of 621 PBSA units and 76 affordable residential units, into an area identified by the LBH and GLA as experiencing poor air quality. As such there is potential for future site users to be exposed to elevated pollutant concentrations, additionally there is potential for the proposals to cause impacts at nearby sensitive receptors during the construction and operational phases.

The LBH has undertaken a review and assessment of air quality within its administrative area in line with the requirements of the Environment Act 2021 and the Local Air Quality Management (LAQM) regime. Following this, the LBH has declared a borough-wide Air Quality Management Area (AQMA), declared in 2001, as a result of exceedances of the annual mean nitrogen dioxide (NO₂) objective and the 24-hour mean particulate matter (PM₁₀) objective. Additionally the GLA have undertaken a similar review and assessment in which Air Quality Focus Areas (AQFA) have been designated across London. The Proposed Development is located within the LBH AQMA as well as partially within the Wood Green High Road and Turnpike Lane AQFA.

The total concentration of a pollutant is comprised of explicit local emission sources (such as roads and industrial sources) and the background component. The background component consists of indeterminate sources which are transported into an area from further away by meteorological

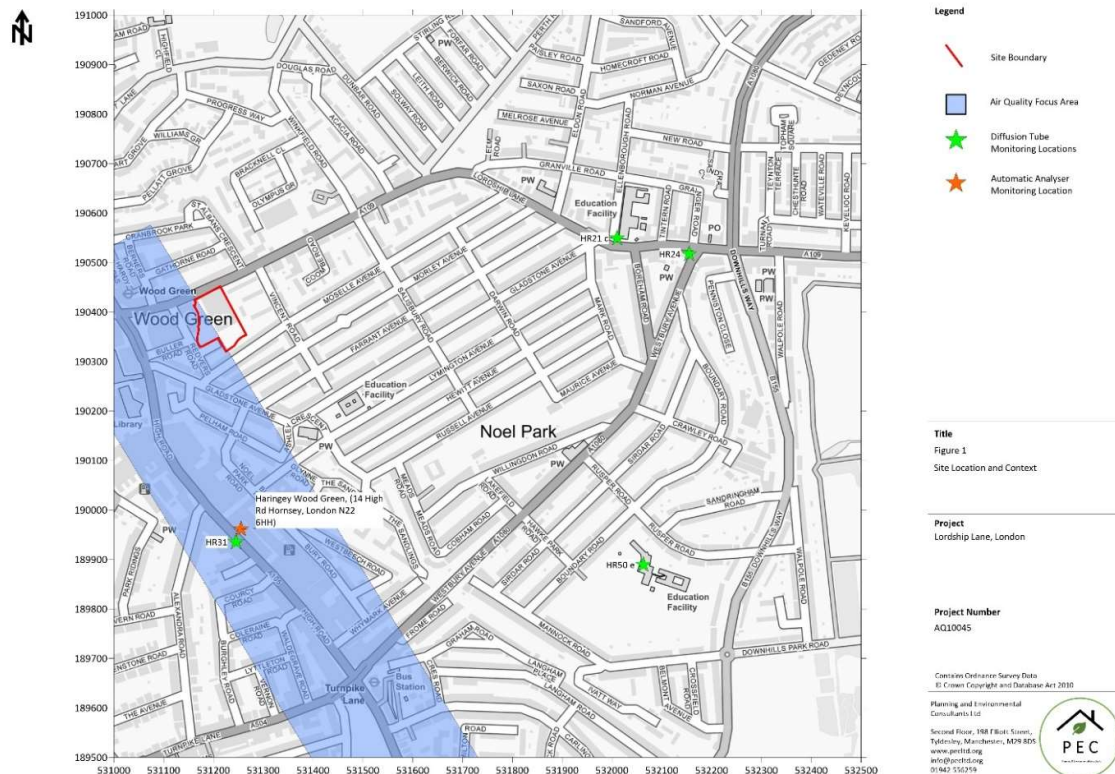
conditions. Background pollutant concentrations are therefore the ambient level of pollution that is not affected by local sources of pollution. In reality, it is not usually practical to obtain a true representation of background levels in urban areas due to corruption by local sources; background levels used in assessments may contain a mixture of both sources. Predictions of background pollutant concentrations on a 1km by 1km grid basis have been produced by DEFRA for the entire of the UK to assist local authorities in their Review and Assessment of air quality. The Proposed Development site is located across grid square NGR: 531500, 190500. Data for this location was downloaded from the DEFRA website. Background concentrations for the current base year (2019) and the predicted development opening year (2027) are:

- NO₂ – 23.31 (2019) and 17.88 (2027);
- PM₁₀ – 19.38 (2019) and 17.86 (2027); and
- PM_{2.5} – 12.93 (2019) and 11.93 (2027).

The LBH operate automatic and passive air quality monitoring within their administration. For the purpose of this screening assessment, 2019 data has been considered as reductions in pollution levels resulting from Covid 19 related behavioural changes mean that 2020 to 2022 data is unlikely to be representative of longer-term pollution levels. One automatic monitoring station and four passive (diffusion tube) monitors are located in close proximity to the development site. Monitoring data has been sourced from the LBH's latest Annual Status Report (ASR) and indicates the Air Quality Objective (AQO) has been exceeded in recent years along High Road. The locations of these monitors as well as AQFAs and the site location are shown in Figure 8. The nearby monitor locations and their measured 2019 annual mean NO₂ concentrations are as follows:

- Diffusion tube HR21C on Lordship Lane Primary School (23.0 µg/m³);
- Diffusion tube HR24 on Westbury Medical Centre (34.1 µg/m³);
- Diffusion tube HR31 on 97/101 High Street (67.8 µg/m³);
- Diffusion tube HR50e on Belmont Junior School (operational from 2021); and
- Diffusion tube HG005 on Acland Burghley School, Burghley Road (operational from 2021).

The annual mean NO₂ objective was exceeded at HR31 but was below the objective at all other nearby monitors in 2019. NO₂ concentrations at the site are likely to be lower than those measured at HR31. This is because the development has a higher set back distance from the road, additionally High Road has an AADT of 22,323 compared with Lordship Lane with an AADT of 18,087 based on Department for Transport (DfT) traffic data. Concentrations would also be expected to be lower in the year of completion (2027) due to projected changes in vehicle fleet composition and resulting reduction in pollutant emissions. As such, it is anticipated that both the annual mean and short-term (1-hour and 24-hour) mean objectives will not be exceeded at the site.

Figure 8. Site Location and Local Context

During demolition and construction, potentially sensitive receptors in the local area would include residential dwellings (high sensitivity receptors) within 350m of the site boundary, as well as those within 50m of the routes to be used by construction vehicles up to 50m from the Proposed Development site entrance(s), as set out in the Institute of Air Quality Management's (IAQM) construction dust guidance⁸ on which the GLA's London Plan Supplementary Planning Guidance (SPG) on construction dust and emissions is based⁹.

During operation, potentially sensitive human health receptors in the local area will include residential dwellings and locations where members of the public would be expected to spend one hour or more, such as eating/drinking establishments, local parks and roof terraces etc. These selected receptors are also classified as being high sensitivity receptors.

Regarding potentially sensitive ecological receptors in the local area, there are no locally designated sites within 2 km of the Proposed Development and two nationally designated sites (two Sites of Special Scientific Interest (SSSIs)) within 5 km of the site. There are not considered to be any likely significant effects in relation to ecological receptors.

Potential for Likely Significant Effects and Design Measures

The stand alone air quality assessment that will be submitted in support of the planning application will consider the potential for impacts within 350m of the Site boundary and within 50m of the routes to be used by construction vehicles up to 500m from the Site's entrance(s). The assessment of construction impacts will follow the methodology set out in the IAQM construction dust guidance and GLA's SPG on

⁸ IAQM (2023), *Assessment of dust from demolition and construction 2023*, v2.1

⁹ GLA (July 2014), *The Control of Dust and Emissions During Construction and Demolition – Supplementary Planning Guidance*

construction dust and emissions. A range of best practice mitigation measures will be recommended to reduce dust emissions and to ensure that there will be no significant effects.

An assessment of the impacts of emissions from Non-Road Mobile Machinery (NRMM) upon local air quality will be carried out in line with the IAQM construction dust guidance. Based on the nature of the development a qualitative assessment will be carried out and there will be no significant effects.

A review of the proposed construction HGV trips will be screened against the EPUK and IAQM air quality planning guidance¹⁰ and set out in a qualitative assessment. The construction HGV trips are expected to be below the screening criteria therefore there will be no significant effects.

The Proposed Development is anticipated to reduce the amount of on-site car parking spaces, compared to the existing usage. This decrease in car parking spaces is expected to lead to a net reduction of vehicular movements generated by the Proposed Development on the local road network. Therefore, there is no requirement for a detailed assessment of road traffic impacts at existing receptors.

The energy strategy for the Proposed Development will involve mains electric supplemented with photovoltaic panels. Therefore, it should be considered that there will not be any centralised combustion plant on-site (with the exception of the emergency combustion plant to be used only in potentially life-safety events) and thus, providing the life-safety combustion plant are well designed, it should be considered that there will be no significant combustion emissions as a result of the Proposed Development that could impact on existing receptors.

An Air Quality Neutral assessment will be undertaken, in line with Policy SI 1 of the most recent London Plan¹¹ and the associated Draft Air Quality Neutral Guidance¹².

Sources of pollutant emissions in the local area along with any emissions from the Proposed Development may impact the air quality for the users of the Proposed Development. The local sources of emissions are predominantly the road traffic, in particular from traffic using Lordship lane and High Road.

It will, therefore, be necessary to model the impact of existing road traffic on the Proposed Development in order to identify if appropriate mitigation where required (such as the use of mechanical ventilation). Consequently, with the use of mitigation (if required), there would be no significant effects as a result of local emissions on the Proposed Development.

Ground level NO₂, PM₁₀ and PM_{2.5} concentrations in 2019 across the site can be estimated based on the DEFRA Background Concentration as detailed above and the roadside monitored concentrations along lordship lane as shown in Figure 8 and above. Pollutant concentrations would not be expected to exceed the annual mean AQO at any location across the site given the similar background levels at site and monitoring locations as well as the predicted reductions in pollutant concentrations in future years.

The design process for the Proposed Development will review the air quality for future users and where there is a risk of exposure to poor ambient air, mitigation (such as through the design of the ventilation strategy) will be incorporated into the design to ensure air which is compliant with the AQOs is provided to relevant receptors within the Proposed Development.

¹⁰ EPUK & IAQM (2017) *Land-Use Planning and Development Control: Planning for Air Quality*

¹¹ GLA (2021a) *The London Plan 2021*

¹² GLA (2021b) *London Plan Guidance – Air Quality Neutral – Consultation Draft*

Conclusion

Subject to the mitigation measures described above and the provision of appropriately worded planning conditions, no significant effects with regards to air quality are anticipated as a result of the Proposed Development.

A stand-alone Air Quality Assessment will be submitted in support of the planning application.

Noise and Vibration

The predominant source of noise is from the traffic using Lordship Lane (A109) adjacent to the northern boundary of the site, as well as some potential for vibration from the London Underground tube lines associated with the Piccadilly Line (located approximately 50m to the west of the site at its nearest point).

Baseline noise levels will be reported in the noise impact assessment to be submitted with the planning application.

Potential for Likely Significant Effects and Design Measures

Noise arising during the demolition/construction of the Proposed Development could result in temporary effects to the neighbouring receptors from the works themselves and machinery used, as well as the associated demolition/construction traffic movements.

During the works, noise related to demolition/construction activities will be controlled to limit noise emissions. 'Best Practicable Means' will be used to control and reduce levels in accordance with Section 60 of the Control of Pollution Act¹³. In addition, the CEMP will contain specific approaches for working relating to demolition/construction phases, which will be informed by the Noise and Vibration Assessment. The document sets out the standards and procedures to which developers and contractors will adhere to when undertaking construction of major projects and projects which include basement works. Given the temporary nature of demolition and construction, permanent significant effects are not expected.

Vibration arising during the demolition/construction of the Proposed Development could result in temporary effects to the neighbouring receptors from the works themselves and machinery used during activities such as piling. Vibration effects can be minimised through the use of appropriate techniques and mitigation measures. As above, the CEMP will contain specific approaches for work relating to demolition/construction phases, which will be informed by the Noise and Vibration Assessment. Practices of monitoring could be secured as planning condition by the LBH. As such, given the opportunity to implement mitigation and monitoring measures, significant effects are not considered likely.

In addition to noise from the construction works themselves, demolition / construction traffic will contribute to existing traffic levels on the surrounding road network. This will lead to increased road traffic noise at receptors adjacent to construction traffic routes and may result in adverse effects. The temporary increase in traffic is considered unlikely to be significant in terms of total flow or construction duration. In addition, a construction logistics plan will be implemented, to ensure that vehicle movements are appropriately managed. As such, significant effects are not considered likely.

There will be no private car parking provision on-site (other than blue badge parking) during the operational phase of the Proposed Development, with occupants and employees to utilise sustainable modes of transport given the proximity to public transport modes. Therefore, noise associated with vehicular trips on the surrounding highway network will reduce, given the site currently comprises a

¹³ Section 61, Control of Pollution Act (1974). Available at: <https://www.legislation.gov.uk/ukpga/1974/40/section/61>

Mecca Bingo Hall which has an existing trip generation. Trips associated with delivery and servicing vehicles will be managed, to minimise adverse effects, via a Draft Delivery and Servicing Plan addressing both retail and commercial deliveries and collections. The associated noise effects are likely to be negligible.

With respect to plant noise, the Noise and Vibration Assessment will specify noise emissions limits in accordance with BS 4142:2014 'Methods for rating and assessing industrial and commercial sound' and the requirements of the LBH. These limits would apply to the cumulative level of noise from fixed plant and machinery. Noise control measures will be introduced as part of the detailed design of the project where it is identified that they are required. The noise emission levels will comply with these limits, and as such there will be no significant effects due to noise from plant.

Conclusion

With the implementation of the above mitigation measures detailed during demolition and construction and operation no likely significant effects are anticipated to occur.

A Noise and Vibration Assessment will be submitted in support of the planning application.

Daylight, Sunlight, Overshadowing, Light Spillage and Solar Glare

Residential properties have a reasonable expectation to daylight and sunlight, and therefore are considered sensitive receptors. The closest receptors which may be potentially affected by the Proposed Development are:

- 690-706 Lordship Lane;
- 1-47 Moselle Ave;
- 17-20 Wellesley Road;
- 1-5 Wellesley Road;
- 2-10 Redvers Road;
- 1-16 Vincent Square;
- 17-22 Vincent Square;
- 23-28 Vincent Square;
- 681-703 Vincent Square; and
- Omnibus House

Commercial spaces such as offices and retail areas are not considered sensitive receptors and are therefore not assessed.

In terms of overshadowing, potentially sensitive locations are:

- The private residential gardens along Lordship Lane to the north;
- Omnibus House's terrace to the west; and
- The Vincent Square green areas to the east.

With regard to potential solar glare effects from the Proposed Development, this has the potential to affect nearby road users.

Due to the use of the Proposed Development as a student accommodation and residential led scheme, no significant effects are anticipated in relation to light spillage. Any non-residential uses proposed are also limited in scale and therefore not anticipated to create any adverse light pollution effects and are not considered likely to generate any significant effects.

A Daylight and Sunlight Assessment will be produced and submitted in support of the planning application.

Potential for Likely Significant Effects and Design Measures

Owing to the evolving and changing nature of demolition and construction and any phasing activities, the assessment of potential effects during the demolition and construction of the Proposed Development on daylight, sunlight, overshadowing, light spillage and solar glare to surrounding sensitive receptors will not be assessed or analysed.

Effects in relation to daylight, sunlight, overshadowing, light spillage and solar glare would vary throughout the demolition and construction stage. They would, however, be less than the effects of the completed development.

Those effects, which may be perceptible during construction, would be similar or less when compared to those of the completed Development. On this basis, there is no need to consider any further daylight, sunlight, overshadowing, light spill or solar glare effects throughout the demolition and construction works.

Given the change in massing from the existing baseline condition (a low level massing compared to the recent developments to the west) it is inevitable that alterations in daylight and sunlight will occur to the above listed sensitive receptors which are in excess of the recommended 20% reduction values, particularly to rooms served by balconies and those on the lower levels within buildings very close to the site boundary. Given the under-developed nature of the Site, the BRE's mirror-massing approach has been utilised to establish alternative and more realistic targets for the Site. However, through the design development, impacts will be minimised where possible so that the overall daylight and sunlight levels will remain largely commensurate with the wider urban context.

Light spillage is typically considered an issue where light is emitted towards sensitive receptors from artificial sources, such as high-powered external lighting or when spillage occurs from highly glazed offices. With regard to potential light pollution effects from the Proposed Development, no high powered external lighting are proposed and as such, no significant light pollution effects are anticipated.

With regard to potential solar glare effects from the Proposed Development, the façades of the Proposed Development will not comprise large areas of unshaded glazing or other highly reflective materials. It is therefore not anticipated that instances of solar reflections would occur close to the centre points of a road driver's field of view. Therefore, no significant solar glare effects, are considered likely.

Conclusion

The massing of the Proposed Development has been designed to minimise any likely daylight, sunlight and overshadowing effects on surrounding sensitive receptors and any adverse impacts arising will be consistent with an urban development within this context. Retained levels will be largely commensurate within the wider urban context.

A Daylight and Sunlight Assessment will be submitted in support of the planning application.

Water Resources and Flood Risk

The site is located within an area designated as '*Flood Zone 1 land assessed as having a less than 1 in 1,000 of annual probability of river flooding (<0.1%)*'. A flood risk assessment (FRA) will be prepared and submitted in support of the planning application. Environment Agency (EA) information for the site indicates that there is a very low risk of surface water flooding across the site¹⁴.

¹⁴ Source: *Your long term flood risk assessment* - GOV.UK (check-long-term-flood-risk.service.gov.uk)

The site is partially located within a groundwater Source Protection Zone I – Inner Protection Zone, and partially located within a Source Protection Zone II – Outer Protection Zone. Additionally, the site has a ‘Unproductive’ Groundwater Vulnerability designation, which means there are no aquifers in the area and no risk of pollution of groundwater.

Potential for Likely Significant Effects and Design Measures

Considering the location of the site within Flood Zone 1, it is considered unlikely that the construction of the Proposed Development will significantly affect flood risk, either in relation to the site itself or, at off-site locations. However, the Proposed Development’s planning application will be accompanied by an FRA. The FRA will include measures to ensure that flood risk is appropriately mitigated. The existing lower ground levels present will be retained with no vertical or horizontal extension anticipated, noting that there is an approximately 2m level change across the site, so the proposal anticipates some regrading to ensure level access can be achieved at entrances. As such, significant effects associated with flood risk during construction or operation are not considered to be likely.

There will be an increase in wastewater during the demolition and construction works. An appropriate project specific CEMP will be implemented prior to and during the demolition/construction phase of the project, which will include appropriate measures to manage any discharges of water from the site to ensure no increased risk of (surface water) flooding. Significant effects are therefore not considered likely.

There will also be demand for clean water during the construction works (e.g. for damping down), however the volume is not expected to be substantial (and will be temporary), and therefore effects will not be significant.

Once operational, the Proposed Development drainage scheme will be designed in accordance with relevant legislation and policy guidance. The FRA will consider in detail the flood risk potential of the site. This will ensure that the Proposed Development is designed to ensure that there are no significant flood risk effects.

The Proposed Development will incorporate Sustainable Urban Drainage Systems (SUDS) techniques into the design. The Proposed Development’s drainage strategy will not increase the potential of any surface water flooding occurring at the site or further downstream, and therefore the effects are not considered to be significant.

The existing surfaces at the brownfield site are predominantly impermeable. As the Proposed Development will incorporate SuDS features within the proposed scheme, this will provide a net benefit in terms of surface water flood risk; reducing surface water flow rates and volumes released from the development, and improving water quality, amenity and biodiversity. Therefore, the Proposed Development is not considered likely to result in significant environmental operational effects in terms of flood risk and drainage.

With respect to foul and clean water, the Proposed Development may lead to an increase in demand. Thames Water typically require a planning condition to be attached to the planning decision notice for the completion of a network capacity assessment. Based on the outcome of this assessment, additional capacity can then be implemented if necessary. As a result, effects on clean water demand are not considered to be significant. For wastewater, whilst there is likely to be an increase in wastewater from the Proposed Development, due to the increase in scale of the buildings proposed, however the increase is not considered to pose a significant risk, with any shortfall in capacity to be addressed by Thames Water Utilities through a network reinforcement.

Conclusion

The planning application will be supported by a FRA and sustainable drainage strategy. It is considered that any significant Water Resources, Flood Risk and Drainage effects are unlikely with the implementation of standard mitigation controls. An assessment of the risk of contamination of controlled waters (i.e. groundwater and surface water) is discussed in the Ground Conditions section below.

Ground Conditions

The Phase I Desk Based Assessment and Phase II Ground Investigation reports, prepared by Tweedie Evans Consulting Limited (TEC), confirm that the site is underlain by the bedrock geology of the London Clay formation (comprising clay, silt and sand). This is classified by the EA as unproductive strata which are defined as “*rock layers or drift deposits with low permeability that have negligible significance for water supply or river base flow*”. The site is reported to lie within a Zone I and Zone II Groundwater Source Protection Zone (SPZ). There are 16 reported groundwater abstraction records within 1km, the nearest reported at approximately 610m to the southwest of the site. There are four discharge consents to groundwater records within 1km, the nearest is approximately 820m to the southwest of the site.

The site slopes to the southeast. The site is situated at an approximate elevation of 22m Above Ordnance Datum (AOD) in the northeast corner of the site, sloping down to approximately 20mAOD in the southwest of the site and 19.65mAOD in the southeast of the site.

It is understood that a culverted water course is present in the south of the site, although no evidence of this feature has been recorded during surveys.

It is likely that the site and surrounding area have had a number of potentially contaminative land uses indicating possible historic contamination of the soil on site such as through the existing on-site car park however the risk of contamination (including to controlled waters) is considered to be low to moderate.

Potential for Likely Significant Effects and Design Measures

Laboratory results recorded elevated concentrations of heavy metals and PAHs in excess of the assessment criteria for a residential development. Therefore, there is a potential for construction workers and off-site users to ingest, inhale or come into dermal contact with windblown contaminated dust and potential for ground contamination from general construction related activities.

However, the risk to site workers will be mitigated through suitable Personal Protective Equipment and welfare facilities. In addition, a site-specific CEMP will be produced, which would ensure that good site working practices for construction and maintenance workers are enforced so that impacts from potential contamination are minimised.

The anticipated ground conditions comprise low permeability London Clay Formation that will restrict contamination migration.

It is unlikely that any piling works required during construction will be deep enough to penetrate through the London Clay formation. London Clay is considered relatively impermeable (an unproductive aquifer) and therefore will not provide groundwater pollution pathways. Construction workers will undertake good site working practices such that impacts of potential contamination are minimised, this will ensure equipment and vehicles are maintained in accordance with good site practices to reduce the risk of hydrocarbon contamination and that they are washed down appropriately and only used when required.

The site is not in a ‘Radon Affected Area’ and therefore no radon protection measures are considered to be necessary for the new buildings.

It is recommended that prior to works commencing, an asbestos survey is undertaken to determine the presence of asbestos-containing materials. If present, removal works will need to be performed by a

specialist contractor prior to the demolition phase, in accordance with the Control of Asbestos Regulations (CAR 2012).

Given the variety of mitigation measures that will be implemented during the demolition and construction stage, significant environmental effects are not considered to be likely.

During the operation of the Proposed Development, it is considered that there is the potential for surface water runoff to become contaminated from routine site operation and/ or accidental release. A Sustainable Drainage Systems (SuDS) strategy will be produced to ensure that any surface water runoff will be treated appropriately to the requirement of the Lead Local Flood Authority (LLFA) prior to being discharged accordingly. This will ensure that there will be no adverse effects from the Proposed Development as a result of routine operation and/or accidental spillage on soils, geology and hydrogeology.

Where soft landscaping is proposed in areas of potential concern for contamination, and where made ground remains after finished site levels have been achieved, a suitable cover system may be required to prevent exposure to contaminants. Alternatively, given the limited and localised nature of contamination exceedences, further testing may be undertaken once final site levels are achieved to determine the requirement for any such remedial measures.

Conclusion

With the implementation of suitable mitigation as detailed, no significant ground conditions effects are considered likely.

Wind Microclimate

Within London, prevailing winds are from the south-west, and the risk of windy conditions at street level depends on the orientation and massing of the buildings with respect to the prevailing winds and the interaction with their surroundings.

The site is surrounded by a mixture of buildings ranging from 2 storey residential to 7 storey commercial. Omnibus house to the west of the site, is a 7 storey development, which will provide shelter from the westerly and dominant south westerly winds. It is expected that the existing conditions are suitable for their intended use at ground level.

Potential for Likely Significant Effects and Design Measures

It is recognised that throughout the demolition of the existing buildings and construction, the erection of the new structure may affect the local wind microclimate. However, given the scale of the development and therefore the scale of the equipment to be used, these effects are considered to be temporary and not anticipated to be significant.

The operation of the Proposed Development will introduce new buildings onto the site with a height of ground plus 9 storeys. This is taller than the existing building so there is risk of raised winds at ground level. However, there are a number of features of the site and surrounds which are likely to minimise the risk of raised winds, and therefore the chance of significant effects. The neighbouring Omnibus House site to the west provides significant shelter of the proposed development western façade from the westerly winds and south westerly winds. The orientation of the proposed development is such that facades are not exposed to the dominant south westerly winds. These two key features are likely to lead to no significant effects. Where raised winds do exist, these will be reduced to suitable levels through localised mitigation such as canopies, baffles, screens or landscaping.

Conclusion

With the implementation of suitable mitigation as detailed above, no significant wind effects are considered likely.

Waste and Materials

In accordance with best practice measures, a CEMP will be prepared in response to a planning condition attached to the permission, which will include details of the types of waste stream that will likely be generated on-site throughout the construction works, along with the relevant recycling / disposal route. Waste minimisation strategies incorporated in the design and procurement strategy, and information on how waste will be managed during the construction works (e.g. the employment of the waste hierarchy strategy, to minimise the volume of waste produced and to divert waste from landfill as far as possible) will also be outlined within the CEMP. Mitigation measures (in line with the Institute of Environmental Management and Assessment (IEMA) guidance¹⁵) will be implemented to avoid, remedy or mitigate adverse effects in terms of materials consumption during the demolition and construction and will likely include:

- CEMP will be conditioned and subsequently prepared, and submitted to the LBH, which includes requirements to consider materials selection for the construction of the Proposed Development;
- Materials sourced locally as far as reasonably practicable;
- Reused, upcycled or recycled materials, where feasible;
- Minimising the stockpiling of construction materials on site through the use of a 'just in time' delivery system, which provides benefits in terms of minimising the space required for storage, the potential for damage to materials (potentially resulting in materials subsequently unsuitable for their purposes), and minimises the potential for material spoiling due to adverse weather conditions;
- The setting of waste reduction targets and waste reuse / recycling targets prior to commencing onsite works, to encourage transparency and accountability. These targets, and the waste data generated during the demolition and construction works, should be monitored throughout the works; and
- Other good practice management measures, including the potential reuse (off-site) of excavation materials where possible, should be implemented.

The planning application will provide detail on the proposed management of operational waste, including detail of the waste storage and waste collection / management system to be incorporated into the Proposed Development, to mitigate any impacts related to waste.

In view of the above, it is considered that the scale of the construction works, and Proposed Development (once complete and occupied) will not generate substantial amounts of construction or operational waste. Therefore, it is anticipated that no significant effects will arise as a result of the Proposed Development.

Climate Change

Based on the scale of the Proposed Development and the uses proposed, in the context of relevant greenhouse gas (GHG) emission benchmarks and budgets, and the fact that the Proposed Development will incorporate carbon mitigation measures (within the energy strategy), it is considered unlikely that the contribution of GHG emissions associated with the Proposed Development (including

¹⁵ Institute of Environmental Management and Assessment (IEMA), (2020); IEMA guide to: Materials and Waste in Environmental Impact Assessment, Guidance for a proportionate approach

embodied carbon within materials and operational carbon emissions) would lead to material changes in climate conditions over the life of the Proposed Development. In accordance with best practice, the Proposed Development will incorporate carbon mitigation which follows the principles of the carbon management hierarchy (i.e. avoid, reduce, off-set) to reduce as far as reasonably practicable anticipated GHG emissions over the project's lifecycle.

In terms of the impact of climate change on the Proposed Development itself, the Proposed Development will incorporate into the design climate change resilience measures, particularly regarding the energy strategy and flood risk. As such, it is considered unlikely that potential impacts from changes in climate conditions would result in significant effects on the Proposed Development.

Land Take and Soils

It is anticipated that the potential effects on land and soil to be considered relate specifically to land take and soil sealing (i.e. the covering of the ground by an impermeable material).

Land take involves the increase of urbanisation over time, which can ultimately lead to soil sealing (from new buildings or increased hardstanding), resulting in effects such as, but not limited to, the following:

- The loss of permeability / water retention areas and, therefore, generating an increase in surface water runoff and flood risk;
- The reduction in evapotranspiration (due to an increased absorption of energy from the sun, caused by asphalted or concrete surfaces, roofs and stone factors), when combined with heat, creates the urban heat island effect, which is particularly serious for the health of vulnerable groups of people such as chronically ill and the elderly;
- The loss of vegetation, which can play an important role in capturing and absorbing polluting gases; therefore, trees and shrubs can have an indirect effect on air quality, as they can influence wind speed and turbulence; and
- Changes to the microclimate, due to sealed surfaces having higher surface temperatures than green surfaces, ultimately contributing to global warming.

The Proposed Development represents an opportunity to redevelop the site in a bespoke and sustainable manner. Regeneration of this nature will lead to a range of benefits, specifically relating to housing and student accommodation. In addition, the development of the site will provide improved public realm, connectivity, surveillance and aesthetic (visual) enhancements over the existing situation.

The site is not a 'greenfield site'; it is not natural or semi-natural land, or designated open that is proposed to be 'taken up' by urban development. As a result, no likely significant effects associated with 'Land Take' are anticipated because of the Proposed Development.

With regards to 'Soil', it is likely that the site and surrounding area have had a number of potentially contaminative land uses indicating possible historic contamination of the soil on site. On this basis, soil contamination is as considered earlier within the 'Ground Conditions'.

Major Accidents and Disasters

For any new development, a project's vulnerability to major accidents and natural disasters will be considered both in terms of the project being affected by an external man-made accident or by natural disaster, as well as any secondary effects resulting from these effects e.g. potential knock-on effects to surrounding receptors.

The London Resilience Partnership (LRP) has developed the London Risk Register, 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 already 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.

Due to the nature and surroundings of the Proposed Development, many of the events listed in the 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 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.

In some cases, this risk management process will be further supported with project-specific information and assessments which form part of the wider planning process. The requirement for a Flood Risk Assessment within the planning application will address the flood related risks as listed in the London Risk Register. Although the site is under 1 hectare in area and located within Flood Zone 1, therefore posing low flood risk overall, any flood risk will be dealt with through a Flood Risk Assessment with a suitable drainage strategy proposed. The Proposed Development would ensure finished floor levels are of a suitable height to reduce potential effects from flooding.

The site is not located in the vicinity of any Control of Major Accident Hazard (COMAH) sites. During the construction works, the implementation of the CEMP by the appointed contractor would ensure that any hazardous materials on site, including asbestos, would be removed in an appropriate manner and by licenced contractors.

The closest airport to the site is London City Airport, located approximately 15km to the south-east of the site. The site is not located within any protected flight zones.

The Proposed Development will comprise entirely residential, student accommodation and commercial uses; the risk of accidents and disasters in relation to the end use of the site is inherently low.

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.

Cumulative Effects

The EIA Regulations require that the potential for cumulative effects of a development project are considered in determining whether a development project is 'EIA development'.

It is noted that the EIA Regulations only refers to 'cumulation with other existing development and/or approved development'. However, best practice dictates that cumulative assessments should have regard to other development projects which are 'reasonably foreseeable' (i.e. usually those under construction or with planning permission) with more limited consideration given to proposals for which determination is still pending. Such a review is only capable of being carried out based on publicly available information.

Other development projects that meet the following selection criteria have been reviewed to allow for the consideration of whether significant cumulative effects with the Proposed Development are likely:

- Schemes that are subject to a high degree of certainty of being delivered (i.e. those that are reasonably foreseeable e.g. those with full planning consent, proposed schemes pending a decision, or a resolution to grant consent) or at early stage of construction;
- Schemes located within 1 km of the redline boundary of the site; and
- Schemes which produce an uplift in gross floor area of 10,000 m² (Gross External Area) or schemes providing 150 residential units or more; or
- Office to residential conversions (granted under the General Permitted Development Order) giving rise to over 150 residential units.

The closest cumulative development (Planning Application Reference HGY/2017/2886 – Land off Brook Road and Mayes Road) is approximately 400m to the south-west of the site (include name of app) for the following and was approved in 2021:

“Demolition of existing building and erection of a 6-9 storey building providing 161 residential flats (Use Class C3), medical centre (Use Class D1), retail (Use Classes A1-A4) and a flexible retail / office unit (Use Classes A1-A4 and B1), plus associated infrastructure and landscaping works.”

Other cumulative developments in the search area are of a similar scale to the Proposed Development and are physically and visually separated from the site. There is one larger cumulative development, which has been subject to EIA; the Land at Haringey Heartlands which received outline planning permissions and then reserved matters approval for a large scale residential led mixed use development. This site is almost 1km from the site and is not considered to impact the same sensitive receptors to those that could be impacted by the Proposed Development.

It is considered that, similar to the Proposed Development, other development projects would be required to subscribe and adhere to the legislative, planning policy and best practicable means requirements that have been set for the aforementioned environmental disciplines in respect of the control of demolition and construction effects and that these would be secured and implemented in accordance with site specific planning conditions.

In respect of cumulative operational effects, it is considered that all the development projects would be required to deliver standard mitigation and enhancement measures as part of the design evolution and planning process. On this basis, significant cumulative effects are considered unlikely. The wider regeneration of the area through the delivery of the cumulative developments is likely to bring about beneficial cumulative effects, albeit not significant.

Conclusion

In summary, environmental effects associated with socio-economics and health, archaeology, ground conditions, traffic and transport, air quality, noise and vibration, water resources, drainage and flood risk, ecology, wind microclimate, solar glare, built heritage, wind microclimate, townscape and visual, energy and climate change and major accidents and disasters, resulting from the Proposed Development are not anticipated to be ‘significant’.

There is the potential for neighbouring properties to experience adverse effects on existing levels of daylight and sunlight once the Proposed Development is operational. However, the levels of daylight likely to be experienced are considered acceptable for a dense urban environment and commensurate with light levels found elsewhere in the immediate locality.

We trust that the information presented within this letter is sufficient in order for the LBH to produce and issue an EIA Screening Opinion for this Proposed Development within three weeks from the date of this letter.