



EIA Screening Report

Farnham and Hildene, London Borough of Havering

June 2024

Contents

1.

Introduction

1

2.

Overview of the Site and the Development

4

3.

The Environmental Context and Site Sensitivity

8

4.

EIA Screening Analysis

15

5.

Summary and Conclusions

39

- Appendix 1: Preliminary Ecological Appraisal
- Appendix 2: Baseline Archaeological Desk-based Assessment
- Appendix 3: Phase 1 Preliminary Risk Assessment
- Appendix 4: Preliminary Flood Risk Assessment
- Appendix 5: Daylight and Sunlight Briefing Note
- Appendix 6: Traffic Technical Note
- Appendix 7: Preliminary Air Quality Assessment

Prepared by: Frances Austin and Tom Kane

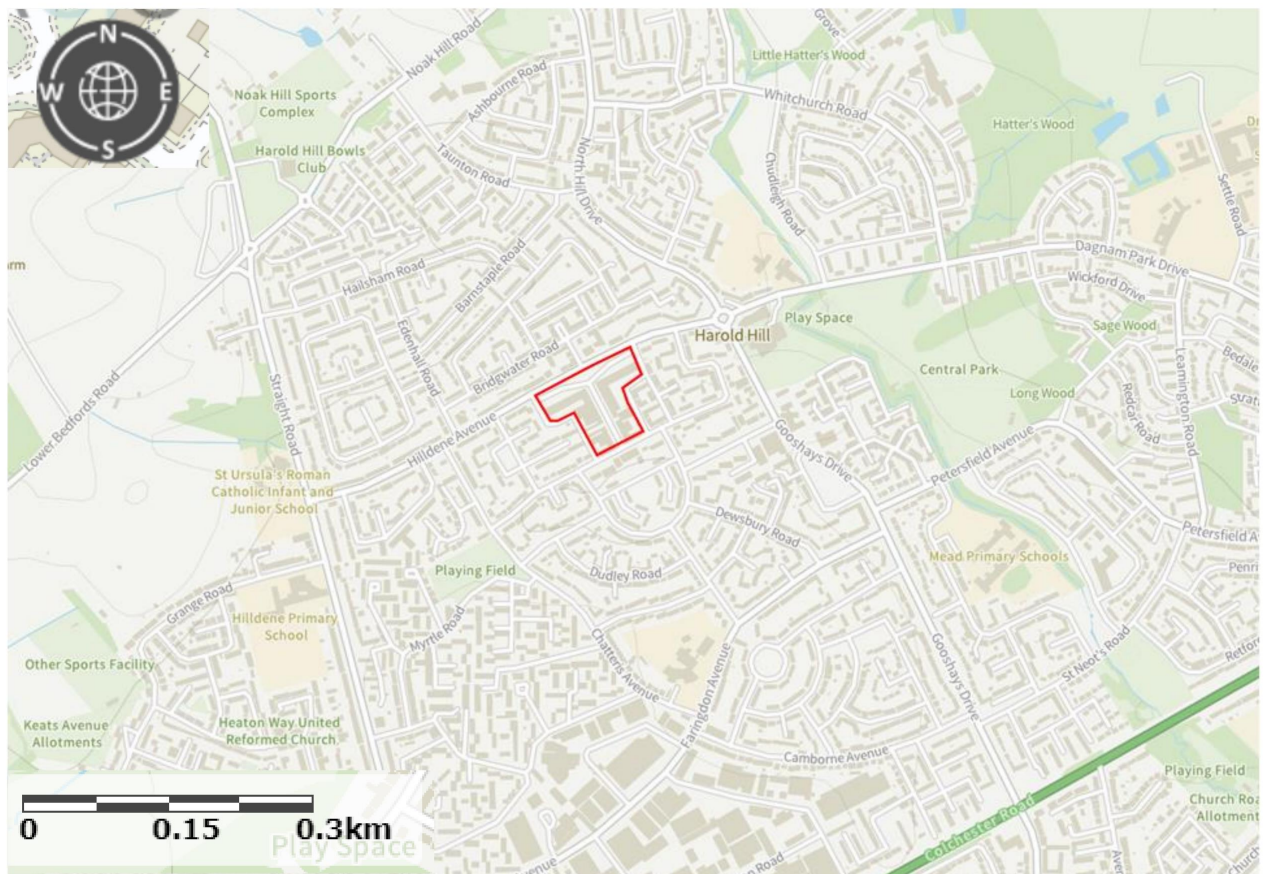
Date: June 2024

For and on behalf of Avison Young

1. Introduction

- 1.1 Avison Young has been appointed by the London Borough of Havering ('the Applicant') to request an Environmental Impact Assessment (EIA) Screening Opinion in support of a planning application for a mixed use, residential and commercial development on land at Farnham Road and Hilldene Avenue in the Harrold Hill area of Romford ('the Site').
- 1.2 The Site currently comprises retail uses with residential flats located above, covering an area of approximately 3.7 hectares.
- 1.3 The location of the Site is shown in **Figure 1** below.

Figure 1: The Site Location



- 1.4 The proposals include the phased demolition of the existing commercial and residential buildings and structures and the subsequent construction of up to 500 residential units and up to 7,000 square meters (sqm) of floorspace across seven blocks; along with associated infrastructure, landscaping, parking and open space ('the Development').

1.5 This EIA Screening Report summarises the findings of the research and analysis undertaken by Avison Young and the assessment team in relation to the baseline conditions and the potential environmental effects of the development. This report aims to determine whether there is a likelihood of significant environmental effects to enable an informed decision on the need for EIA to be made by the London Borough of Havering (LBH).

1.6 Provision for the request of an EIA Screening Opinion from LBH is made within Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) subsequently referred to as the 'EIA Regulations', which states:

(1) "A person who is minded to carry out development may request the relevant planning authority to adopt a Screening Opinion.

(2) A person making a request for a screening opinion in relation to a development where an application for planning permission has been or is proposed to be submitted must provide the following:

(a) A plan sufficient to identify the land;

(b) A description of the development, including in particular:

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;

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."

1.7 As required by the EIA Regulations, the request for an EIA Screening Opinion is accompanied by a plan sufficient to identify the land, a description of the development, a description of the aspects of

the environment likely to be significantly affected by the development and a description of any likely significant effects of the development on the environment. Additional information is provided in accordance with guidance presented in the online Planning Practice Guidance¹.

1.8 In relation to the obligations on local planning authorities, the EIA Regulations state within Regulation 6 that an EIA Screening Opinion should be adopted within 3 weeks of receiving a request.

1.9 Regulation 5 (5) of the EIA Regulations states:

“Where a relevant planning authority adopts a screening opinion under regulation 6(6), or the Secretary of State makes a screening direction under regulation 7(5), the authority or the Secretary of State, as the case may be, must-

(a) State the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3;

(b) If it is determined that proposed development is not EIA development, state any features of the proposed development and measure envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment; and

(c) Send a copy of the opinion or direction to the person who proposes to carry out, or who has carried out, the development in question.”

1.10 Accordingly, we request that LBH provides an EIA Screening Opinion with details of the reason for their decision within three weeks of receipt of this report.

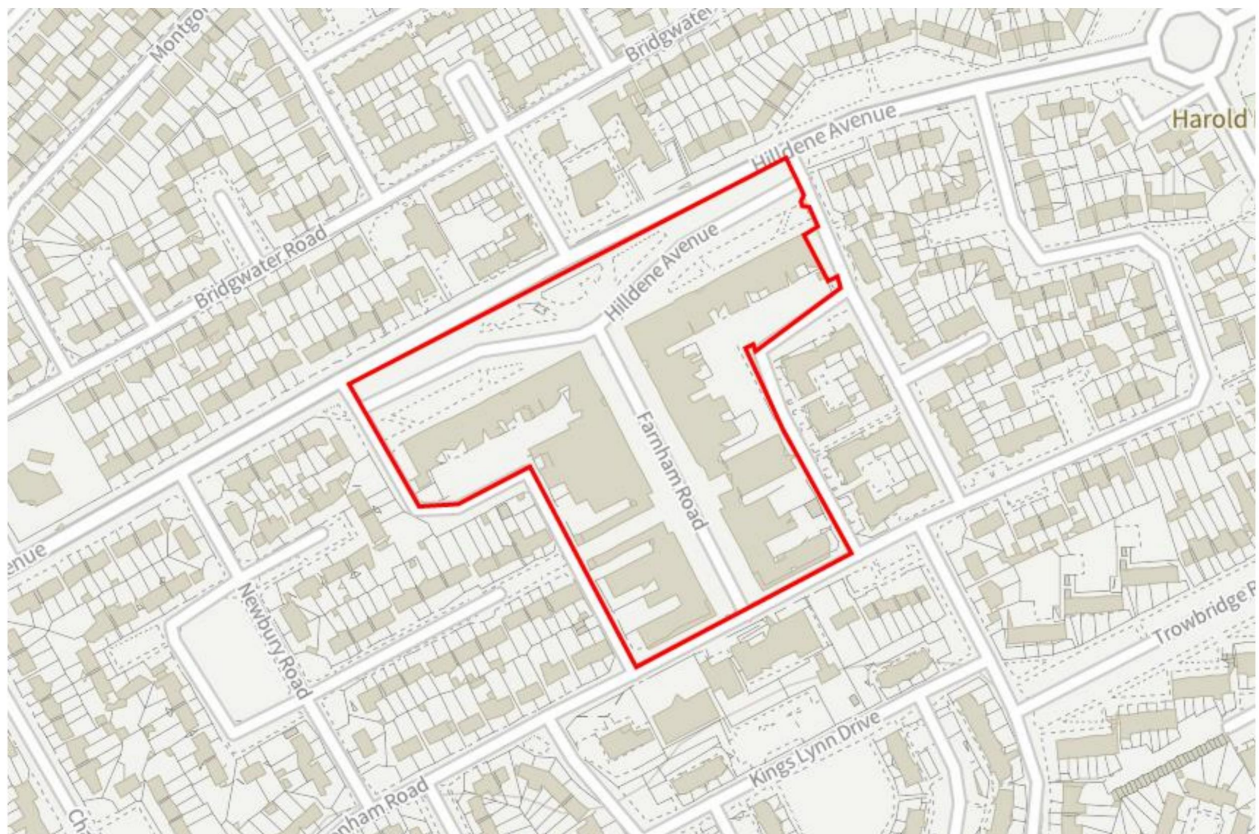
¹ Department for Communities and Local Government (2014) Planning Practice Guidance <http://planningguidance.planningportal.gov.uk>

2. Overview of the Site and the Development

Overview of the Site

- 2.1 The approximately 3.7 hectare Site is located in the Harrold Hill area of Romford and is predominantly occupied by retail uses at ground level with residential units located above.
- 2.2 The Site is bound by:
- Hildene Avenue to the north;
 - East Dene Drive to the east;
 - Chippenham Road to the south; and
 - West Dene Drive to the west.
- 2.3 Farnham Road runs through the centre of the Site.
- 2.4 The location of the Site is shown in the plan provided in **Figure 1**. The Site boundary is shown in **Figure 2**.

Figure 2: The Site



- 2.5 The Site is primarily comprised of retail buildings and hardstanding, alongside associated infrastructure, including internal roads, surface car parking and landscaping. Farnham Road comprises a shopping high street of 4-storey buildings on either side of the road with ground level commercial frontages and residential flats above. Harold Hill Library is located off Farnham Road within the eastern half of the Site.
- 2.6 The Site is made up of 8,825 sqm of retail floorspace, 117 homes, 248 pay and display customer car parking spaces and 104 permit holder spaces.
- 2.7 The existing buildings on the Site can be grouped into four broad types:
- Brick flat roofed four-storey residential block with commercial units at ground level;
 - Brick flat roofed single-storey commercial units;
 - Brick flat roofed single-storey buildings at the rear of the commercial units; and
 - A two-storey newly built library building.
- 2.8 The north of the Site, parallel to Hildene Avenue, contains a large parking area. Along this frontage is a stretch of single storey shops with 3 storey residential housing located above.
- 2.9 The existing soft landscaping within the Site is limited and located within the north of the Site off Hildene Avenue and comprises amenity grassland with individual mature and semi-mature trees situated within the amenity grassland.
- 2.10 The Site has a PTAL rating of 1b to 2, which indicates a low level of accessibility to public transport.
- 2.11 The Site has a general northern fall from a high point of approximately 44m Above Ordnance Datum (AOD) in the south to a low of approximately 42m AOD in the north.

Site Planning Context

- 2.12 The Site is within Harold Hill Town Centre. The schemes are planned to regenerate the town centre to become an attraction for the wider community.
- 2.13 The first scheme includes the demolition of Former Harold Hill Library, located adjacent to the Site to the north, to create a Family Welcome Centre and Health Centre (planning reference P0461.22). The second scheme includes the redevelopment of 'Chippenham Road', located adjacent to the Site to the south, to deliver approximately 150 homes across six apartment complexes. The location of these schemes can be seen in **Figure 3**. The third scheme is the Development.

Overview of the Development

- 2.14 Whilst the design of the Development is not yet fixed, the information provided to Avison Young by the Applicant in respect of the Development (and summarised here) is considered adequate to establish the likely environmental effects of the Development and to advise on EIA Screening matters.
- 2.15 The Development would comprise up to 500 residential dwellings (Use Class C3) and up to 7,000 sqm of floorspace in Use Classes E (retail, office, professional services, healthcare, nursery, café), F1 (education), F2 (local community uses) and Sui Generis (pub, hot food takeaway) across seven blocks. This would be an increase of 383 residential dwellings and a decrease in commercial floorspace of approximately 1,825 sqm. The blocks would range from four to six storeys in height, with the taller massing concentrated towards the northern and southern boundaries.
- 2.16 All of the existing structures on the Site would be demolished except for Harold Hill Library which would be retained. The demolition and construction of the Development would be undertaken broadly in two phases. Phase one would be located in the northern/north-western part of the Site adjacent to Hilldene Avenue and would comprise the demolition of existing structures and the construction of three blocks. The construction of these blocks would include the re-provision of key retail units which are currently located in the southern portion of the Site, as well as residential units. Phase two would be located in the southern part of the Site and would comprise the demolition of existing structures and the construction of four blocks. These blocks would also comprise commercial and residential units.
- 2.17 Commercial units would be located throughout the Site at the ground level, with the residential uses located above.
- 2.18 Harold Hill Library would be retained as part of the Development.
- 2.19 The Development would not include any new basements.
- 2.20 A new north-south pedestrian route through the Site between Hilldene Avenue and Chippenham Road would be provided. A corridor of landscaped public areas would be incorporated along this route in addition to other amenity spaces and public realm across the Site. The landscaping proposals would also include courtyard gardens for use by residents.
- 2.21 Open space and play space provision will be delivered in accordance with policy requirements.
- 2.22 Vehicular access arrangements would remain mostly as existing, with the one-way routes of West Dene Drive (northbound only) and East Dene Drive (southbound only) retained. Vehicles would enter

and exit the Site via either East Dene Drive, at the junction with Hilldene Avenue, or via West Dene Drive, at the junction with Chippenham Road. The existing vehicular access via the junction between Farnham Road and Chippenham Road would be removed for general vehicular access but would remain available for emergency vehicles.

- 2.23 Up to 300 car parking spaces would be provided across the Site, of which approximately 200 would be for residents and 100 would be for users of the commercial uses. This would be a reduction of 52 car parking spaces.
- 2.24 The drainage strategy for the Development will incorporate sustainable urban drainage systems (SuDS) techniques and will be designed to cope with future climate scenarios.
- 2.25 In accordance with the London Plan, the Development would be net-zero carbon. The energy strategy would not include any on-Site combustion plant and would be electric only.
- 2.26 The Development will achieve a minimum Building Research Establishment Environmental Assessment Methodology (BREEAM) rating of 'Very Good'.
- 2.27 Effective environmental management of the Site during the demolition and construction works would be ensured through the implementation of a Construction Environmental Management Plan (CEMP). Examples of measures which will be included are those which reduce noise, dust emissions, night-time light emissions and avoid the incidence of contaminated run-off.
- 2.28 A Construction Logistics Plan (CLP) would be developed in line with Transport for London (TfL) guidance.
- 2.29 It is broadly anticipated that the first phase of the Development would be completed and operational in 2028 with the remainder of the Development completed and operational in 2034.

3. The Environmental Context and Site Sensitivity

Predominant Existing Land Uses

- 3.1 The Site is formed of a single parcel of land, comprising four terrace blocks of four storeys in height. The land use consists of ground floor retail with residential above. There are several one and two storey buildings attached to the rear of the terraces that support the ground floor retail functions. The two storey Harold Hill Library is located between two of the terraces in the eastern part of the Site.
- 3.2 Small, grassed areas with sporadic deciduous trees up to 10m in height and small bushes, a recycling area, a war memorial, and a telephone mast can be found along the northern boundary of the Site. In the western half of the Site is an electricity substation.
- 3.3 The existing Site is made up of 8,825 sqm of retail floorspace, 117 homes, 248 pay and display customer car parking spaces and 104 permit holder spaces.
- 3.4 Adjacent to and beyond the Site are a range of land uses predominantly comprising:
- To the **north**, the Site is bound by Hilldene Avenue. Further north, the land use is predominantly residential, comprising low-rise (predominantly one and two storey) properties.
 - To the **east**, the Site is bound by East Dene Drive. Further east is a cluster of low-rise (predominantly one and two storey) residential properties. Mulberry Bush Nursery & Pre-School and Bright Futures Nursery are located approximately 200m and 270m east of the Site boundary respectively. Central Park Leisure Centre is located beyond these alongside Central Park.
 - To the **south**, the Site is bound by Chippenham Road. Further south are low-rise (predominantly one and two storey) residential properties. Broadford Primary School is located 400m south of the Site boundary.
 - To the **west**, the Site is bound by West Dene Drive. Further east are low-rise (predominantly one and two storey) properties. St Ursula's Catholic Primary School and Hilldene Primary School are 560m and 620m west and south-west of the Site respectively.

Historic Land Uses

- 3.5 A review of historic mapping shows the Site to have been agricultural land since at least 1895 when the Site was mapped on the 1:10,560 Ordnance Survey series. The Harold Hill housing estate was

built by London County Council between 1948-58. Rapid development in Harold Hill took place in the 1950s and the area has experienced minimal changes since then.

Transportation

- 3.6 There are no public rights of way across the Site, nor in the immediate vicinity.
- 3.7 Existing vehicle access to the Site is from three main points. West Dene Drive and East Dene Drive provide access to the north of the Site from Hildene Avenue. Access is provided from Chippenham Road onto Farnham Road from the south of the Site. The Site can also be accessed by pedestrians from the south along West Dene Drive and East Dene Drive.
- 3.8 The Site has a PTAL rating of 1b to 2, which indicates a low level of accessibility to public transport.
- 3.9 The Site is located 1.75km north of Harold Wood station which provides direct services to London Paddington Station along the Elizabeth Line.
- 3.10 In addition, there are a number of buses which run in proximity to the Site. The nearest bus stop is located on Hildene Avenue, on the border of the Site. The Number 174, 256, 297 and 499 bus routes run directly past the Site offering connections to Rainham, Romford, Noak Hill and Hornchurch. There is also the N86 Night Bus offering services to Stratford, every half an hour during the night.

Air Quality

- 3.11 The Site is located within the Havering Air Quality Management Area (AQMA). The AQMA has been declared for exceedances of annual mean nitrogen dioxide (NO₂) and exceedances of 24-hour mean particulate matter (PM₁₀).
- 3.12 A search of the UK Pollutant Release and Transfer Register website² has not identified any significant industrial or waste management sources that are likely to affect the Development, in terms of air quality.
- 3.13 LBH operates a number of air quality monitoring sites using diffusion tubes. The nearest monitoring sites are located 430m south-west of the Site, 620m south-west of the Site, and 940m north, as well as three co-located approximately, 1.1km south of the Site. Monitoring data from these sites between 2017 and 2021 observed no exceedances of the annual mean nitrogen dioxide objective (40µg/m³). There has been a general downward trend in measured concentrations of NO₂ from 2017 to 2021

² <https://www.gov.uk/guidance/uk-pollutant-release-and-transfer-register-prtr-data-sets>

across all sites, with the most recent measurements³ recording 4 of the 5 sites being 50% lower than the objective and the final site being marginally above 50% of the objective.

Noise and Vibration

- 3.14 The Site is located within a suburban area. Baseline noise monitoring was undertaken by RBA Acoustics at three locations in February 2024. Measurements were taken from a roof overlooking Farnham Road, which is considered to be the main source of noise for that area of the Site. Measurements were also taken from East Dene Drive and West Dene Drive which were considered to be the main sources of noise for that area of the Site. The typical background noise during the daytime was between 47 dB and 52 dB and was between 42 dB and 45 dB during the night-time.

Townscape, Visual Amenity and Built Heritage Assets

- 3.15 The Site is not situated within any area designated in recognition of its landscape quality or value at either a statutory national level (Area of Outstanding Natural Beauty or National Park), or at a non-statutory local level (Special Landscape Area).
- 3.16 The Site is not situated in a Conservation Area. The nearest conservation area is Havering-atte-Bower Conservation Area, located 2.6km north-west of the Site.
- 3.17 The Site is not subject to any statutory or non-statutory heritage designations, and there are no Listed Buildings within the Site. The nearest Listed Building is located 940m west and is Grade II listed farmhouse (Bellevue).
- 3.18 There are no Scheduled Monuments or Registered Parks and Gardens within the Site. The nearest Scheduled Monument is Dagnam Park Farm moated site located 1.2km east. The nearest Registered Parks and Gardens is Weald Park, located 2.8km north-west of the Site.
- 3.19 The Site does not fall into any identified key views in the Havering Local Plan (2021)⁴, or the Heritage Supplementary Planning Document ('SPD') adopted in 2011⁵.

³ London Borough of Havering Annual Status Report (ASR), 2022.

⁴ https://www.havering.gov.uk/downloads/file/5300/havering_local_plan_2016_-_2031

⁵ https://www.havering.gov.uk/download/downloads/id/5784/heritage_2011.pdf

Biodiversity and Ecology

3.20 A Preliminary Ecological Appraisal has been produced by Greengage Environmental (**Appendix 1**).

Designations

3.21 There are no statutory biodiversity sites of international importance located within 10km of the Site boundary. Within 2km there are 2 Sites of Special Scientific Interest (SSSI) and 2 Local Nature Reserves (LNR). The closest designated site is The Manor LNR located approximately 730m east of the Site.

3.22 There are two statutory designated sites within a 2km radius of the Site:

- The Manor LNR (also Metropolitan Site of Importance for Nature Conservation (SINC)) located 880m east.
- Bedfords Park LNR (also Metropolitan SINC) located 1.2km west.

3.23 There are 20 non-statutory SINC's within 2km of the Site boundary. Below are the closest sites within the search radius.

- Carter's Brook and Paine's Brook located 600m east – Borough Grade II SINC.
- Bellvue located 700m west – Borough Grade I SINC.
- Long Wood and Sage Wood located 800m west - Borough Grade I SINC.
- Broxhill located 900m north - Borough Grade II SINC.

Habitats

3.24 Within the Site are the following UK Habitat Classification categories:

- Developed land; sealed surface;
- Buildings;
- Modified Grassland;
- Scattered trees; and
- Introduced shrub.

3.25 At the northern end of the Site is modified grassland adjacent to an area of car parking and Hildene Avenue. The grass is short and regularly maintained. There are also trees scattered across an area of introduced shrub. Tree species include willow, oak and elder.

Species

- 3.26 The Site is situated in an urban environment surrounded by roads, hard standing and buildings with scattered patches of green space. There are high levels of artificial lighting present on the Site and in the surrounding area. With vegetation focused towards the northern end, the Site is assessed to have low potential to support foraging bats. Overall, the bat roosting potential was also deemed as low as the small gaps in some of the buildings were only suitable for small numbers of crevice dwelling bats and given light levels and urban context. The Applicant subsequently confirmed that Greengage reported that no bats were recorded during an emergence survey.
- 3.27 The scattered trees and shrubs provide a nesting habitat for a range of common and widespread bird species. The feral pigeon was observed loafing on the roofs of a number of buildings. Whilst nesting could not be confirmed given the time of the survey, the potential for nesting birds using the buildings was considered to be high.
- 3.28 Buddleia sp., a London Invasive Species Initiative (LISI) species was confirmed present on Site.
- 3.29 There is considered to be negligible potential for all other protected and notable species.

Archaeology

- 3.30 A Baseline Archaeological Desk-based Assessment has been prepared by Museum of London Archaeology (MOLA) (**Appendix 2**).
- 3.31 The potential for archaeological survival across the Site is considered to be low due to extensive late 20th century development of the Site. Previously the Site was agricultural land.
- 3.32 A nearby excavation identified that the underlying geology is shallow and that modern buildings have truncated it. Thus, it is very likely the same situation applies to the Site given the buildings and underground services.
- 3.33 The Site is not situated within an Archaeological Priority Area.

Geology, Ground Conditions and Contamination

- 3.34 Published records for the area and available historical borehole logs indicate the geology of the Site to be characterised by London Clay Formation. The London Clay Formation is designated as Unproductive Strata and generally impermeable. Historical data shows that there have been some phases of construction on the Site and therefore the presence of made ground should be expected.

- 3.35 The Site does not lie within a groundwater Source Protection Zone.
- 3.36 There are no permitted or historic landfill sites within or in the proximity of the Site.
- 3.37 The Site is not located within a Mineral Safeguarding Area.
- 3.38 The Site is classified as having low unexploded ordnance risk, low radon risk and low ground gas risk.
- 3.39 Use of the Coal Authority interactive viewer⁶ indicated that the Site lies outside their Coal Mining Reporting Area.
- 3.40 A Phase 1 Preliminary Risk Assessment has been prepared by RSK (**Appendix 3**). The preliminary Conceptual Model completed for the Site identified potential contaminants of concern from previous and current uses of the Site (dry cleaning premises, cleaning businesses, tannin and nail salon and an electrical substation). Materials that could be present beneath the Site may include rubble from previous on-Site buildings. Potential contaminants may include chlorinated solvents, volatile organic compounds, ground gas and vapours and polychlorinated biphenyls (PCB's).
- 3.41 Based on the available information the risk estimations to the following receptors were made:
- Moderate/low - Future site users from potential on-Site contamination by direct contact with impacted soils/liquids, inhalation of soil vapour, dust fibres and ground gases.
 - Moderate/low – Building structures and buried services from on-Site contamination by direct contact with contaminated soils or groundwater and chemical attack.
 - Low – Existing/future vegetation from root uptake leading to phytotoxicity.

Flood Risk

- 3.42 A Preliminary Flood Risk Assessment has been produced by Evolve Consulting Engineers (**Appendix 4**).
- 3.43 The nearest water course is Paines Brook, an Environment Agency Main River, that flows broadly south approximately 375m to the east of the Site.
- 3.44 The risk of fluvial flooding within the Site is considered low. The Site is located entirely within Flood Zone 1 as defined by the Environment Agency, indicating a less than 1 in 1,000 (0.1%) annual probability of flooding via river or sea sources.

⁶ <https://mapapps2.bgs.ac.uk/coalauthority/home.html>

- 3.45 The Site is also at a low risk of coastal/tidal flooding or flooding from sewers, reservoirs, canals, ponds, groundwater or other artificial sources.
- 3.46 The Environment Agency⁷ shows the Site to be at low risk from surface water flooding with a depth of water between 300mm and 900mm which is a standard interval set by the Environment Agency. This means that the Site has a chance of flooding of between 0.1% and 1% each year.

Socio-economics

- 3.47 There are 4 secondary schools located within 2.5km of the Site, one of which is a boys only school. Overall, there is a shortage of 100 spaces within secondary schools that are located within 2.5km of the Site.
- 3.48 There are 6 primary schools within 1km of the Site. There is a surplus of 23 spaces available for children ages 4-11 in primary schools within 1km of the Site.
- 3.49 Within the borough, there are 82.8% of 16 to 64 year olds in employment in the year ending September 2023, this is a decrease when compared with September 2022 when the local rate was 83.3%⁸. This is higher than the London average, where employment was 74.6%.

Sensitivity of the Site

- 3.50 With reference to all information provided above, it can be demonstrated that the Site is not located within a 'sensitive area' as defined by the EIA Regulations; that is, a site comprising one or more of the following:
- Site of Special Scientific Interest.
 - Land to which Nature Conservation Orders apply.
 - International conservation sites.
 - National Parks.
 - Areas of Outstanding Natural Beauty.
 - World Heritage Sites.
 - Scheduled Monuments.

⁷ <https://flood-map-for-planning.service.gov.uk/>

⁸ ONS: Economic Activity in Havering. <https://www.ons.gov.uk/visualisations/labourmarketlocal/E09000016/#unemployment>

4. EIA Screening Analysis

- 4.1 When assessing whether an EIA is required, the guidance published in Planning Practice Guidance has been followed⁹, taking into account the requirements of Schedules 1, 2 and 3 of the EIA Regulations. The analysis is presented below.

Is the Proposal Schedule 1 Development?

- 4.2 According to the EIA Regulations and guidance, the application is not of a type that would constitute Schedule 1 development.

Is the Proposal Schedule 2 Development?

- 4.3 The Development is categorised under Schedule 2, Class 10 'Infrastructure Project' Subsection (b) 'Urban development projects'. For such development, an EIA may be required if:
- The development includes more than 1 hectare of urban development which is not dwelling house development; or
 - The development includes more than 150 dwellings; or
 - The overall area of the development exceeds 5 hectares; or
 - The development is located within a sensitive area as defined by the EIA Regulations.
- 4.4 As stated previously, the Site is not located within a sensitive area as defined by the EIA Regulations.
- 4.5 Although not a sensitive area, the Development exceeds the dwellings thresholds and as such, it is categorised as 'Schedule 2' development. It is, therefore, necessary to consider the criteria as set out in Schedule 3 of the EIA Regulations to determine whether there would be significant environmental effects as a result of the Development. A request for an EIA Screening Opinion is made on this basis.

⁹ <https://www.gov.uk/guidance/environmental-impact-assessment>

Consideration of Schedule 3 Criteria: The Likelihood of Significant Environmental Effects

Approach

4.6 In screening the Development, the factors set out in Schedule 3 of the EIA Regulations need to be carefully considered to determine whether significant effects are likely, and EIA is needed. The relevant factors comprise:

- The characteristics of the Development (refer to **Section 2**) with particular regard to: (a) the size and design of the whole development; (b) cumulation with other existing development and/or approved development; (c) the use of natural resources, in particular land, soil, water and biodiversity; (d) the production of waste; (e) pollution and nuisances; (f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge; and (g) the risks to human health (for example, due to water contamination or air pollution).
- The location of the Development (refer to **Section 2** and **Section 3**) and the environmental sensitivity of the geographical areas likely to be affected by the Development.
- The types and characteristics of the potential environmental effects of the factors specified in Regulation 4(2) namely: (a) population and human health; (b) biodiversity; (c) land, soil, water, air and climate; (d) material assets, cultural heritage and the landscape; and (e) the interaction between the factors referred to in sub-paragraphs (a) to (d) (refer to **this Section**).

4.7 Planning Practice Guidance states that in judging whether the effects of a development are likely to be significant, local planning authorities should have regard to the possible cumulative effects with any approved development. Approved development within 1km of the Site is considered appropriate and projects which benefit from the following have been included:

- A resolution to grant planning permission;
- A valid planning permission and yet to start on-site; and
- A valid planning permission and under construction.

4.8 In addition to this, one further scheme, 'Chippenham Road', located immediately south of the Site has been included for consideration. Whilst Chippenham Road is still at the pre-application stage and no planning application has been submitted, the Applicant is seeking to deliver both the Development and the Chippenham Road scheme. Given this, and the proximity of the two schemes to one another,

Chippenham Road has been included in discussions regarding cumulative effects in the following sub-sections.

4.9 **Table 1** and **Figure 3** detail the Cumulative Schemes.

Table 1: Details of the Cumulative Schemes

Location and Planning Ref.	Proposal	Status	Distance from Site
P0883.20 Havering College of Further And Higher Education Tring Gardens Romford RM3 9ES	Demolition of existing buildings and redevelopment of the site to provide 120 residential dwellings comprising 78 houses and 42 flats (1bed x 12, 2bed x 53, 3bed x 55) with associated car parking, landscaping, open space, play space and infrastructure.	Full application approved subject to conditions 01/02/2022 Under Construction. Expected to complete summer 2025.	c. 825m north-east.
The Former Harold Hill Library P0461.22 Phase 1 of the Farnham & Hildene Estate Regeneration Former Harold Hill Library, Hildene Avenue, Havering, London, RM3 8DJ	Demolition of the existing buildings and structures and redevelopment of the site consisting of the erection of a part 2, part 3, part 4-storey building (with additional plant and enclosures at 5-storey level) to provide for a new hostel facility (Use Class Sui Generis) with 74 rooms for short-term emergency accommodation and 1,499 square metres (GIA) of floorspace for a Health Centre (Use Class E(e)), along with associated hard and soft landscaping, parking, access and highway works.	Permission granted 16/11/2022. Under construction.	Immediately north.
Chippenham Road Phase 2 of the Farnham & Hildene Estate Regeneration	Redevelopment of the Site to provide c.148 residential units.	Pre-application	Immediately south.

Figure 3: Aerial Map of Cumulative Schemes

4.10 The Development has been appraised, having regard to all of the above factors as listed in Schedule 3 of the EIA Regulations, together with the information provided within **Section 2** and **Section 3** of this report and discussion of the results and conclusions of this appraisal is presented below. For each environmental topic area considered, environmental effects are considered for:

- The demolition of the existing buildings on the Site and construction of the Development (Demolition and Construction);
- The Development once completed and operational (the Completed Development); and
- The Development in combination with the Cumulative Schemes (the Cumulative Scenario).

4.11 Where environmental information for the Cumulative Schemes is available in the public domain, these were taken into account in the appraisal provided below. Details regarding Chippenham Road have been obtained from the Applicant and their design team.

Townscape, Visual Amenity and Built Heritage

Demolition and Construction

- 4.12 As noted in **Section 3**, the Site is not within a Conservation Area, the nearest Listed Building is 940m west of the Site boundary, and the Site is not situated within any area designated in recognition of its landscape quality or value at either a statutory or non-statutory level. Due to the distance of any statutory or non-statutory sites, the presence of demolition and construction works at the Site would not have any impact on these heritage assets as a result of changes to the setting of these assets.
- 4.13 The physical presence of a construction site would give rise to the presence of visible hoardings, plant and machinery and other activities associated with the Works. However, any townscape and visual effects associated with the Works would be limited, localised and temporary.
- 4.14 Furthermore, the phasing of the construction works, the implementation of standard best practice management and incorporation of a range of good construction site housekeeping initiatives would be implemented with the aim of reducing effects on townscape, visual amenity and the setting of heritage assets. These would include, but not limited to:
- The maintenance of adequate construction site hoarding; and
 - The orderly segregation of particular construction site activities, for example, the clear delineation of construction site offices and staff facilities, material storage areas, plant and machinery storage areas.
- 4.15 As the Works proceed and the built form of the Development emerges, the townscape and visual characteristics of the Site would adjust to those that would be generated by the presence of the completed and operational Development. However, for the reasons stated below, the physical presence of the completed and operational Development is unlikely to have significant effects upon the prevailing townscape or views.

The Completed Development

- 4.16 The Site is not located nearby to any designated heritage assets. Given the topography and intervening built form surrounding the Site, the Development would not increase the visibility of the Site to such a degree that there would be an impact on the settings of these designated built heritage assets.

4.17 The completed Development would embed mitigation through design, including:

- A design approach, informed by the project's townscape consultant, Iceni, which is influenced by the character of the surrounding area and the area's regeneration context;
- Orientating buildings to facilitate existing and new local townscape views and provide legibility within the surrounding area; and
- Creation of new amenity space, green spaces, and play areas.

4.18 The existing townscape quality of the Site is low, and the completed Development would be of high-quality design that would enhance its surroundings. The Development would result in a change to the local townscape. However, this is closely aligned to the area's emerging character. The Development would form part of a new townscape composition alongside neighbouring regeneration developments.

4.19 LBH's Local Plan defines Tall Buildings as: *'A tall building is generally understood to be anything which is of significantly greater height than its context.'* The existing Site is predominantly 4 storeys, and the maximum height of the Development would be 6 storeys. Thus, while increasing the height marginally, in line with London Policy D9, the Development should not be considered as a tall building. However, high-quality design and a comprehensive landscaping strategy would seek to reduce any potential impacts arising from the marginal increase in height. Furthermore, whilst the existing buildings are marginally taller than their surroundings, this signals the local district centre. The Development would consolidate this existing relationship, reinstating height and density at a suitable location while not using tall buildings.

4.20 As the Development would be taller than most of the buildings in the surrounding area, some local townscape and visual effects may arise. However, the visibility of the Development would be expected to be limited and short-ranged due to the natural topography of the surrounding area, which rises gradually in all directions away from the Site.

4.21 A Townscape and Visual Impact Assessment will be produced and submitted alongside the planning application to assess these views. Additionally, a Design and Access Statement would also be submitted with the planning application. This would identify how the design and layout of the Development responds to its context and how the approaches to height, scale and design quality of the Development have been considered in the townscape context.

4.22 Considering all of the above, the completed Development would not have significant adverse effects upon townscape, visual amenity and built heritage.

Cumulative Scenario

- 4.23 As for the Development, it is assumed the visual intrusiveness associated with the construction of the Cumulative Schemes nearby would be effectively managed by a CEMP during demolition and construction helping to minimise cumulative effects should the construction of the Cumulative Schemes and the Development coincide. As such significant cumulative effects from demolition and construction works of the Development and Cumulative Schemes together is not considered likely.
- 4.24 The Development would contribute to the ongoing regeneration of Harold Hill Town Centre. The regeneration would bring townscape improvements to the surrounding area. The Development and Cumulative Schemes, especially Chippenham Road and The Former Harold Hill Library, once completed, would bring townscape improvements to the surrounding area contributing to the Harold Hill Town Centre regeneration.
- 4.25 As such, the Development would not have significant adverse cumulative effects upon townscape, visual amenity or built heritage.

Daylight and Sunlight

Demolition and Construction

- 4.26 Effects in relation to daylight, sunlight and overshadowing would vary throughout the demolition and construction phase. There would be no notable effect whilst the existing buildings on the Site are demolished, albeit the levels of daylight enjoyed to the nearby sensitive (residential) receptors could improve temporarily. During the construction, there would be a gradual effect on the daylight and sunlight amenity of nearby sensitive (residential) receptors until the construction of the buildings are nearing completion / completed. At this point any potential effects would represent those of the completed Development as discussed below.

The Completed Development

- 4.27 Delva Patman Redler (DPR) have undertaken daylight and sunlight analysis based on the emerging scheme, as shown in **Appendix 5**. The existing Site is relatively open, therefore the existing properties surrounding the Site currently benefit from high levels of daylight and sunlight. The Development is likely to result in some reductions of daylight and sunlight for some surrounding properties; however, daylight and sunlight levels are still expected to be satisfactory. DPR have therefore confirmed that no significant daylight or sunlight effects are likely to occur.

Cumulative Scenario

- 4.28 **Appendix 5** contains daylight and sunlight analysis including the emerging Chippenham Road massing. DPR have advised that whilst daylight and sunlight effects would be greater than those reported above for the Development in insolation, the overall conclusions remain the same, therefore no significant cumulative daylight or sunlight effects are likely to occur.

Wind Microclimate

Demolition and Construction

- 4.29 It should be noted that the important factor for assessing wind microclimate effects is not whether there is a change in wind conditions, but whether the wind conditions are suitable (comfortable) and safe for the intended pedestrian or occupant use at a particular location.
- 4.30 The wind climate of southern England is typically dominated by south-westerly winds. The surrounding buildings are predominately 2-4 storeys in height and provide protection from the prevailing winds. As result, the removal of the existing built form on the Site is unlikely to give rise to wind conditions which are unsuitable (uncomfortable) or unsafe.
- 4.31 As construction proceeds and the Development emerges, wind conditions in and around the Site would adjust to those that would be generated by the presence of the Development once completed. At this point potential effects would represent those of the completed Development below.

Completed Development

- 4.32 The 2-4 storey buildings surrounding the Site provide a consistent level of shelter. Above this level, the Development will be exposed to the prevailing south-westerly winds. However, the topography of the area means that the Site is relatively low lying, reducing the risk of raised or unsafe wind conditions.
- 4.33 The Development is being designed with input from wind specialists (GIA)). A combined desktop and computational fluid dynamics (CFD) wind assessment will be undertaken in order to inform measures which will ensure that safe and comfortable wind conditions will be achieved. GIA have confirmed that conventional measures, such as landscaping, canopies or localised screening, will be incorporated into the Development, therefore no significant wind microclimate effects are likely. A Wind Assessment would be undertaken and a standalone report will accompany the planning application.

Cumulative Scenario

- 4.34 The Chippenham Road Cumulative Scheme is of a similar scale to the Development and the design is also being informed by input from wind specialists to ensure that safe and comfortable wind conditions will be achieved. The Former Harold Hill Library Cumulative Scheme did not undertake an assessment of wind conditions for the planning application. This indicates that wind conditions were likely to be satisfactory and suitable for intended uses within and around the site. As such, it is unlikely that any significant cumulative effects on pedestrian comfort and safety from wind conditions would arise as a result of the Development and Cumulative Schemes being implemented together.

Archaeology

Demolition and Construction

- 4.35 The Site is not located within an Archaeological Priority Area and the Baseline Archaeological Desk-based Assessment (**Appendix 2**) identifies that there are no known centres of past activity in close proximity to the Site. In the post-medieval period the Site was agricultural land located between isolated farmsteads. The Site has a low potential for archaeological remains from all periods.
- 4.36 There have been no archaeological investigations within the Site, however a nearby investigation immediately to the east of the Site revealed that truncation by modern development was present in most trenches, sometimes down to the natural London Clay, generally lying at 0.6m below ground level. Given the proximity of this investigation to the Site, it is predicted that the underlying London Clay would be at a similar depth in open areas, and in developed areas, it would be directly below foundations and footings of the buildings, noting that the Development does not propose the construction of any new basements. Given the shallowness of the underlying geology and the likely truncation associated with the construction of the existing buildings within the Site, it is likely that any archaeological remains surviving within the Site would be heavily truncated.
- 4.37 In view of the above, the demolition and construction is not anticipated to generate significant effects on archaeology. Notwithstanding this, a full Archaeological Desk Based Assessment will be submitted alongside the planning application. Further investigation can take place prior to the commencement of the Works to identify and ascertain the value of any remains (if present), which will mitigate the archaeological effects.

The Completed Development

- 4.38 The completed and operational Development would not give rise to any activities that necessitate intrusive ground works. Consequently, there would be no potential for any archaeological effects once the Development is completed and operational.

Cumulative Scenario

- 4.39 No discrete and localised buried heritage assets shared with the Cumulative Scheme are anticipated and therefore no significant cumulative effects are predicted to arise.

Geology, Ground Conditions and Contamination

Demolition and Construction

- 4.40 The Site is not designated for any geological interest or importance and does not yield any significant geological resource. The demolition and construction works would not give rise to any effects upon geological resources.
- 4.41 As set out previously, the Phase 1 Preliminary Risk Assessment (**Appendix 3**) identifies potential contamination sources as a result of current and former land uses on the Site, including the risk level to receptors. However, such issues are common to almost all urban redevelopment projects, particularly in London. Furthermore, legislation dictates that all redevelopment must not give rise to the unacceptable contamination of humans or the wider environment. As such, all contamination would be successfully managed and mitigated via various standard means including:
- Further Site Investigation (SI) to further investigate, qualify and quantify the potential for contamination at the Site.
 - Based on the SI findings, the preparation of an appropriate remediation strategy to be agreed in conjunction with LBH and the Environment Agency to ensure the Site is entirely appropriate for its end-use and causes no unacceptable contaminative risks (and therefore effects) to human health and the environment.
 - The selection and employment of construction techniques that minimise contaminative risks, particularly with regard to intrusive works such as piling.
 - Adherence to relevant legislative and best practice construction mitigation measures to ensure a well-managed operation which minimises potential environmental risks to all receptors. The CEMP will outline management procedures for pollution prevention, hazardous materials storage, requirements for risk assessments and method statements (accounting for UXO matters), use of

materials on-Site and the disposal of materials from the Site. The CEMP would outline health and safety requirements for workers who may encounter contaminants.

- Implementation of a surface water drainage strategy, including petrol / sediment interceptors.

4.42 All of the above can be secured by standard planning conditions. Based upon the tried and tested effectiveness of the above, and in view of the fact that the Development will not introduce contaminative land uses or activities to the Site once completed, it is not anticipated that the Development will give rise to significant contamination risk or effects. Nonetheless, to adhere with planning (not EIA) requirements, the Phase 1 Preliminary Risk Assessment will be submitted alongside the planning application for the Development.

The Completed Development

4.43 For the reasons previously stated, the completed Development would not affect any designated site of geological interest or importance; neither would the Development give rise to any effect upon geological resources.

4.44 The completed and operational Development would not give rise to any activities that necessitate intrusive ground works. In addition, the Development does not include any land uses that would be of a contaminative nature. Consequently, the completed Development would unlikely give rise to any significant contamination risks or effects.

Cumulative Scenario

4.45 In the event the Cumulative Schemes encounter geological or contamination issues, it is considered reasonable to assume the implementation of best practice environmental management controls and additional legislative requirements (separate to the EIA Regulations) would mean all matters would be (or have been) adequately dealt with so as to prevent significant effects on human health and/or the geological environment. Therefore, it is unlikely significant geological, ground conditions or contamination cumulative effects would result either during construction or on completion and operation of the Development and the Cumulative Schemes together.

Flood Risk and Drainage

Demolition and Construction

4.46 As noted in **Section 3**, the Site is located in Flood Zone 1 as defined by the Environment Agency, indicating a less than 0.1% annual probability of flooding by river or sea. The Site is also at a low risk

of coastal/tidal flooding or flooding from sewers, reservoirs, canals, ponds, groundwater or other artificial sources. The Site is at low risk from surface water flooding.

- 4.47 Despite the low risk of flooding from all sources, as per standard practice, the implementation of best practice environmental management controls would ensure appropriate surface water drainage of the construction site, thereby ensuring no occurrence of significant localised surface water flooding during construction.
- 4.48 Considering the above, the demolition and construction of the Development is not anticipated to generate significant effects or risks in relation to flooding and drainage.

Completed Development

- 4.49 As detailed in the Preliminary Flood Risk Assessment (**Appendix 4**), as the Site is in an area of low flood risk, the Development would not be subject to any significant risk and effects associated with fluvial or tidal flood risk. It is also at low risk of flooding from sewers, reservoirs, canals, ponds groundwater and surface water. The Development must be designed to ensure surface water is not increased at the Site. In addition, climate change considerations require that the completed Development must be designed with the resilience to cope with increases in precipitation frequency and intensity which may give rise to increased incidences of surface water flooding events. Sustainable drainage system (SuDS) will be incorporate, adhering to the SuDS hierarchy. To support this, a Flood Risk Assessment will be submitted with the planning application.
- 4.50 In view of the above, the design of the Development would ensure inherent design measures of the Development to safeguard against surface water and groundwater flooding risks and effects at the Site and elsewhere, even accounting for climate change. Considering the above, the completed and operational Development is not anticipated to generate significant effects or risks in relation to flooding and drainage.

Cumulative Scenario

- 4.51 It is assumed that with the implementation of best practice environmental management controls to minimise effects during demolition and construction for both the Development and the Cumulative Schemes, it is unlikely cumulative effects would result during demolition and construction in the event they overlapped.
- 4.52 The Cumulative Schemes are also located in a Flood Zone 1. In line with policy requirements, the Cumulative Schemes will minimise off-Site flood risk effects from surface water as part of their

design. As such, it can be concluded that there would be no significant cumulative flood risk effects arising from the Development together with the Cumulative Schemes.

Biodiversity and Ecology

Demolition and Construction

- 4.53 The buildings on Site were identified as having low potential to support roosting bats and are scheduled to be removed as part of the demolition of the Site. The Applicant subsequently confirmed that Greengage reported that no bats were recorded during an emergence survey.
- 4.54 The potential for roosting birds as outlined in **Section 3**, is high, and therefore tree removal and demolition of buildings will take place outside of the nesting bird season (March-September inclusive). If this is not possible, clearance will only take place following the confirmation of absence of nesting birds from a suitably qualified ecologist. This is in-line with best practice and to avoid a contravention of the Wildlife and Countryside Act, 1981 (as amended). In addition, precautionary measures would be employed during site clearance to ensure the adequate protection and removal to a safe location of any reptiles or hedgehog that may be present on the Site at that time.
- 4.55 There are no statutory or non-statutory sites on or within close proximity to the Site. They are considered to be adequately distanced from the Site so that they would not be directly or indirectly affected by demolition or construction activity.
- 4.56 The CEMP will include best practice environmental management controls during the Works. This will include measures to reduce noise, dust emissions, night-time light emissions and avoid the incidence of contaminated run-off. Given the lack of notable species present on Site and standard measures that can be implemented, no significant ecological effects would be likely to arise during the demolition works and construction of the Development.

The Completed Development

- 4.57 Landscaping and biodiversity enhancements will be provided within public realm as part of the Development. Although beneficial, this biodiversity gain is unlikely to be significant. As such, significant effects on ecological receptors and biodiversity are not anticipated once the Development is completed.

Cumulative Scenario

- 4.58 As for the Development, the Cumulative Schemes would also proceed in accordance with relevant wildlife legislation to ensure adequate protection of protected and notable species including nesting birds, bats, reptiles and hedgehog. As such, no cumulative effect on flora or fauna is likely to arise during demolition and construction.
- 4.59 Once completed, the Cumulative Schemes would also provide biodiversity enhancements through the provision of new habitat creation and improved landscaping. Although this would result in beneficial cumulative effect on biodiversity, which could be locally important, no significant cumulative effects are anticipated from the Development and Cumulative Schemes together once completed.

Transportation

Demolition and Construction

- 4.60 The Works, without appropriate mitigation, could give rise to some disruption to the normal operation and functioning of the local road network. Potential vehicular traffic effects would be associated with the phased removal of demolished material and delivery of construction materials to the Site, including Heavy Good Vehicles (HGVs).
- 4.61 However, the demolition and construction works would be planned and programmed to minimise such disruption and allow for continued access to surrounding land uses. The phased demolition and construction of the Site would aid this. A Construction Logistics Plan (CLP) would be developed in line with TfL guidance. The CLP would set out all traffic and transport related management methods and controls to ensure minimal disruption to the surrounding road network. For example, designated vehicular access and egress to the Site would be stipulated to ensure that the strategic road network is utilised as far as possible. Vehicular traffic arising from construction site deliveries and pick-ups would follow pre-agreed designated routes and be timed to avoid peak traffic hours.
- 4.62 Similarly, the CLP would also deal with the appropriate management of the pedestrian realm surrounding the Site. For example, should any public footway closures be required, these would be clearly advertised. Additional signposting would be erected to inform and guide pedestrians to nearby alternative routes. It therefore follows that temporary pedestrian realm disruptions and diversions would be managed so as to avoid significant effects.
- 4.63 In view of the above, demolition and construction is not anticipated to generate significant effects on road users.

The Completed Development

- 4.64 As set out **Section 2**, There would be up to 300 car parking spaces within the Development for both residents and retail users.
- 4.65 The Guidelines for the Environmental Assessment of Traffic and Movement¹⁰ (the 'IEMA Guidance') sets out a threshold of +/- 30% change in traffic flows to judge whether a traffic effect is likely to be 'significant, reduced to +/-10%' in sensitive locations. Given the residential nature of the Site's surroundings, the road links in the vicinity of the Development are of a 'sensitive' nature.
- 4.66 A Traffic Technical Note has been produced by WSP which estimates trip-generation based on the proposed quantum of Development (**Appendix 6**). This estimates a 10.5% increase in the number of two-way vehicle trips to and from the Site compared to the existing scenario. However, given that vehicles would be arriving from Hilldene Avenue and Chippenham Road, WSP have advised that this would not result in significant effects.
- 4.67 The Development would also include design and operational measures to encourage travel by public transport and active travel further reducing the proposed number of trips.
- 4.68 A Travel Plan and Transport Assessment is being developed which would address the satisfactory operation of the local road network.
- 4.69 It is therefore considered unlikely that there will be any significant effects from the completed Development with respect to transport and traffic related effects.

Cumulative Scenario

- 4.70 Should the demolition and construction works overlap with the construction programmes of the Cumulative Schemes there may be a potential for cumulative construction traffic effects to occur. However, as for the Development, it is assumed the construction activities of the Cumulative Schemes would be effectively managed through their own CLPs and CEMPs. This would ensure minimal disruption to the surrounding road network.
- 4.71 The Former Harold Hill Library Cumulative Scheme will provide eight car parking spaces. The Chippenham Road Cumulative Scheme is expected to provide a maximum of ten additional car parking spaces on top of the 40 currently on the site. Both Cumulative Schemes would also be subject to their own Travel Plan and Delivery and Servicing Plans. It is therefore considered unlikely that there

¹⁰ Institute of Environmental Management and Assessment Guidelines: Environmental Assessment of Traffic and Movement (2023)

will be any significant cumulative effects from the completed Development and the Cumulative Schemes together with respect to transport and traffic related effects.

Air Quality

Demolition and Construction

4.72 The demolition and construction works could have the potential to give rise to the following air quality effects:

- Dust emissions and associated nuisance generated by demolition and construction activities; and
- Additional emissions to the atmosphere from the operation of construction plant and machinery and construction related traffic generation.

4.73 Some airborne dust and dirt tracking on highways is inevitable but receptors very close to the Site are expected to experience nuisance for only short periods of time when the phased demolition and construction activity is occurring at closest points on the Site boundaries. Dust and particulate matter generated during demolition and construction can be largely mitigated through the measures implemented through a CEMP. These measures would include the use of site hoarding, wheel washing and damping highways and ground surfaces during dry weather and covering stockpiled materials. These standard measures and the temporary nature of the demolition and construction are typically sufficient to minimise dust nuisance effects, particularly at greater distances from construction activity and construction traffic routes. Through the minimisation of dust and dirt tracking implemented by good site management and monitoring, significant air quality effects are unlikely to occur during demolition and construction.

4.74 Temporary emissions from construction plant and machinery and construction traffic contribute only a very small proportion of air pollution and are, therefore, also unlikely to result in a significant effect on air quality.

The Completed Development

4.75 As identified in **Section 3**, the Site is located within the LBH borough-wide AQMA.

4.76 The net increase of traffic generated by the Development once completed and operational would be expected to be more than 100 motorised trips per day. As detailed in the Preliminary Air Quality Assessment (**Appendix 7**), according to the Institute of Air Quality Management (IAQM) Guidance¹¹, this could be above the threshold for requiring detailed air quality modelling within an AQMA.

¹¹ <https://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf>

However, given that local air quality concentration are well below 90% of the annual mean NO₂ objective, IAQM Guidance states that a higher screening threshold can be applied. This higher screening thresholds suggests up to a net increase of 500 motorised trips per day may be acceptable, for which the increase associated with the Development would be well below.

- 4.77 Given the above, it follows that the Development is unlikely to significantly contribute to road traffic emissions.
- 4.78 The energy strategy for the Development would not include any on-Site combustion plant and would be electric only, therefore no emissions would be contributed from on-Site plant.
- 4.79 Considering all of the above, it is considered that the Development is not likely to generate significant air quality effects once completed and operational. An Air Quality Assessment will be produced following consultation with the Environmental Health Officer, and the report submitted with the planning application.

Cumulative Scenario

- 4.80 Should demolition and construction works overlap with the construction programmes of the Cumulative Schemes there may be a potential for cumulative construction dust nuisance effects to occur. However, as for the Development, it is assumed the construction activities of the Cumulative Schemes would be effectively managed by a CEMP. This would reduce disruption to the surrounding sensitive receptors so significant effects are less likely.
- 4.81 As above, given that the monitored NO₂ levels within the Development are notably lower than the air quality objective within the borough, the traffic generation associated with the Cumulative Schemes mean it is unlikely that the cumulative air quality effects flow would be significant.

Noise and Vibration

Demolition and Construction

- 4.82 In common with all active construction sites, the demolition and construction works could have the potential to give rise to noise nuisance including noise from plant and machinery as well as noise from construction traffic.
- 4.83 There are a number of receptors located in proximity to the Site, and so noise and vibration from the demolition and construction activities such as foundation piling could result in some noise nuisance for a short-term, temporary period with receptors likely to be affected for only parts of the construction phase and period within that when activity is ongoing in the closest part of the Site.

- 4.84 Measures to be implemented as part of a CEMP would aim to reduce noise and vibration nuisance during the Works. These standard measures and temporary nature of the Works are typically sufficient to minimise noise and vibration effects. These measures would include the following:
- Adherence to reasonable construction site working hours which would avoid early mornings, night-time and weekend working (unless required for an emergency situation).
 - The use of modern, low noise emission plant and machinery.
 - Switching off plant and machinery when not in use.
 - Noise and vibration monitoring to assess the effectiveness of the management controls and to indicate if any when additional measures may be required.
- 4.85 Construction traffic routing set out in a Construction Logistics Plan would minimise time spent on residential roads wherever possible. As a large increase in traffic (in the order of 20 to 25%) is required to generate a perceptible increase in traffic noise by noise sensitive receptors, it is considered unlikely that construction traffic noise effects will be significant.
- 4.86 Considering all of the above, and the temporary nature of effects the demolition and construction is not anticipated to generate significant noise and vibration effects.

The Completed Development

- 4.87 As previously outlined, the overall increase in traffic volumes and flows on the local road network generated by the Development would be well below 20-25% when compared to the existing situation. It therefore follows that road noise emissions would unlikely be significantly affected by this addition of traffic to the local road network.
- 4.88 With regard to potential noise emissions from the operation of building plant, the Development would be informed by the requirements of the LBH's Environmental Health Department. This is:
- "Noise levels expressed as the equivalent continuous sound levels $L_{Aeq}(1 \text{ hour})$ when calculated at the boundary with the nearest noise sensitive premises shall not exceed $L_{Aeq}(1 \text{ hour}) - 10 \text{ dB}$ and shall be maintained thereafter to the satisfaction of the Local Planning Authority."*
- 4.89 The final design of the Development will be informed by noise emission limits set in accordance with British Standard 4142¹². A detailed plant noise emission assessment would be undertaken and submitted with the planning application.

¹² British Standard 4142:2014+A1:2019 Methods for Rating and Assessing Industrial and Commercial Sound. 2019.

- 4.90 In view of the above, the operation of the completed Development is not anticipated to generate significant noise and vibration effects. To support this, a Noise Assessment would be prepared and would be submitted with the planning application.

Cumulative Scenario

- 4.91 Should the Works overlap with the construction programmes of the Cumulative Schemes there may be a potential for cumulative construction noise nuisance effects to occur. However, as for the Development, it is assumed the construction activities of the Cumulative Schemes would be effectively managed by a CEMP. This would reduce disruption to the surrounding sensitive receptors so significant effects are less likely but due to the close proximity, effects may still be significant albeit they would be temporary in nature.
- 4.92 The traffic generated by the Development and the Cumulative Schemes will be below 20-25% when compared to the existing situation. It therefore follows that road noise emissions would unlikely be significantly affected by this addition of traffic to the local road network.
- 4.93 It is therefore considered unlikely that there would be any significant cumulative noise and vibration effects for sensitive receptors located in the surrounding area.

Socio-economics

Demolition and Construction

- 4.94 The demolition and construction of the Site is proposed in two phases, and consultation is ongoing with LBH to ensure that there would be minimum impact to local businesses and residents.
- 4.95 During the demolition and construction, there is anticipated to be an increase in direct, indirect and induced employment associated with the construction activities on-Site. However, in the context of existing employment within the wider area the effects are unlikely to be significant.

The Completed Development

- 4.96 Once the Development is completed and operational, the resident population of the area would increase. As such, there would be an increased demand for social and community infrastructure and services in the form of education provision for school aged children; health care provision such as new patient spaces at GP surgeries and dentists; open space and play space and shops and local facilities. However, this potential demand on education and health provision can be offset through financial contributions, where necessary and justified, in accordance with the statutory requirements

such as Section 106 contributions and Community Infrastructure Levy. Open space and play space provision will be delivered in accordance with policy requirements.

- 4.97 The Development would result in an approximate 20% reduction in commercial floorspace. However 25% of the commercial units within the Site are currently vacant. Therefore, whilst a change direct, indirect and induced employment opportunities is anticipated, such effects would unlikely be significant beyond a local scale.
- 4.98 Considering all of the above, the completed Development is not anticipated to generate significant socio-economic effects.

Cumulative Scenario

- 4.99 The Cumulative Schemes would also generate direct, indirect and induced employment opportunities during the demolition and construction works. However, the cumulative effect on employment from the Development and Cumulative Schemes together would unlikely be significant.
- 4.100 The Development and Cumulative Schemes together would likely lead to an increased demand for education and healthcare facilities. However, the Former Harold Hill Library Cumulative Scheme will deliver a new Health Centre, which will be capable of accommodating a range of NHS services. Also, as for the Development it is expected that financial contributions would have been made, where justified and necessary, for the Cumulative Schemes through Section 106 and Community Infrastructure Levy to offset the demand for local health and education services.

Greenhouse Gases and Climate Change

Demolition and Construction

- 4.101 Climate change is global in cause and effect. It therefore follows that by virtue of the scale of the construction site and the Development, the demolition and construction is unlikely to significantly contribute to global climate change.
- 4.102 In relation to the emission of greenhouse gases, previous sub-sections demonstrate that expected construction vehicular traffic flows (and therefore emissions which would include greenhouse gasses) are unlikely to be significant when considering the quanta of existing background traffic and emissions. Modern, efficient and low carbon emitting construction plant and machinery would be used throughout the demolition and construction.
- 4.103 Significant greenhouse gas emissions contributing to climate change is therefore unlikely during demolition and construction.

Completed Development

- 4.104 By virtue of the scale and nature of the Development, its operation would not significantly contribute to global climate change. Regardless, where possible, the Development would be designed to minimise greenhouse gas emissions and to ensure resilience to climate change.
- 4.105 With regard to climate change resilience, as noted in a previous sub-section the Site is located in an area of low fluvial and surface water flood risk. However, the design of the Development would safeguard against surface water flooding risks and effects at the Site and elsewhere, even accounting for climate change. Other climate change resilience measures would include optimising building design within the buildings to reduce the risk of overheating and using measures to reduce water demand in all buildings.
- 4.106 The Applicant is also seeking to achieve a Building Research Establishment Environmental Assessment Methodology (BREEAM) rating of 'Very Good', therefore the Development will incorporate energy efficiency measures and low carbon materials with energy likely to be provided through the use of air source heat pumps.
- 4.107 Significant greenhouse gas emissions contributing to climate change is therefore unlikely once the Development is completed and climate change resilience measures would be incorporated into the design.

Cumulative Scenario

- 4.108 As for the Development, it would be anticipated that the demolition and construction works associated with the Cumulative Schemes would be completed in line with best practice environmental measures as to ensure minimal carbon emissions where possible.
- 4.109 It is expected that the Cumulative Schemes would also be designed to minimise greenhouse gas emissions and to ensure resilience to climate change. Therefore, it is unlikely the cumulative effect of the Cumulative Schemes with the Development together would have a significant effect on greenhouse gas emissions and climate change.

Health and Wellbeing

Demolition and Construction

- 4.110 Previous sub-sections demonstrate that the demolition and construction is not anticipated to give rise to any significant contamination, air quality, noise, microclimate, flood risk and/or socio-economic

effects, all of which have the potential to affect human health and wellbeing. Additionally, with the implementation of a broad range of standard, tried and tested construction related best practice environmental management controls, the health and wellbeing of construction site workers, local residents, local workers and visitors to the locality is unlikely to be significantly affected by the demolition and construction works.

The Completed Development

- 4.111 Similar to the above, previous sub-sections demonstrate that the completed and operational Development are unlikely to give rise to significant contamination, air quality, noise, pedestrian comfort and safety, flood risk and/or socio-economic effects. As such, with the Development in place, these environmental factors are unlikely to significantly affect the health and wellbeing of local residents, local workers, users and visitors of the Development and the surrounding locality.

Cumulative Scenario

- 4.112 The above statements regarding the Development in isolation are also valid for the Cumulative Schemes. Consequently, there is no potential for significant cumulative health and wellbeing effects during any concurrent demolition and construction works or following completion and operation of the Development and the Cumulative Schemes.

Waste

Demolition and Construction

- 4.113 It is inevitable that waste would be generated during demolition and construction, and this is the case for any redevelopment project. However, legal and best practice measures and protocols would ensure good construction site management practices lead to reduced waste creation and increase re-use and recycling of waste materials arising from demolition and construction which would be detailed in the CEMP submitted alongside the planning application. Similarly, in accordance with the London Plan 95% of waste will be diverted from landfill. The Development is therefore unlikely to give rise to significant waste effects during demolition and construction.

Completed Development

- 4.114 The operational Development would not include for any land-uses or activities that would give rise to particularly hazardous waste materials. In line with policy requirements, the Development would be designed to ensure sufficient space and facilities are provided for the storage of segregated general and recyclable waste. In addition, the servicing of the Development would allow for adequate waste

collection and disposal, as necessary. The Development is therefore unlikely to give rise to significant waste effects once completed and operational.

Cumulative Scenario

- 4.115 As for the Development, the Cumulative Schemes are also expected to employ good waste management practices during demolition and construction so that significant cumulative effects are unlikely to occur from the Development and Cumulative Schemes together.
- 4.116 Similarly, the Cumulative Schemes would not include for any land-uses or activities that would give rise to particularly hazardous waste materials and it is assumed that they would be designed to ensure that sufficient space and facilities are provided for the storage of segregated general and recyclable waste in line with policy requirements. Significant cumulative effects are therefore unlikely to occur from the Development and Cumulative Schemes together, once completed and operational.

Light Pollution

Demolition and Construction

- 4.117 The Site is well lit with artificial light installations of varying age and is located in a well-lit urban area with high levels of light pollution.
- 4.118 During demolition and construction, there may be periods where floodlighting / security and health and safety lighting would be required. However, as part of the CEMP, measures would be implemented to minimise artificial light spill and glare to nearby sensitive receptors surrounding the Site. As such, demolition and construction activity is unlikely to give rise to any significant light pollution issues.

Completed Development

- 4.119 In respect of the completed and operational Development, a detailed lighting strategy / design would be secured by planning conditions and agreed in advance of the completion of the Development with BCC. The strategy would be designed to relevant British Standards (BS), including BS 5489-1:2013 Code of Practice for the Design of Roads Lighting¹³ and would take account of the Institute of Lighting Professionals Guidance Note 1 for the Reduction of Obtrusive Light¹⁴. Accounting for this it is likely that there would be a decrease in light spill and glare associated with the completed and operational Development with conditions improved as a result of the replacement of older light installations with

¹³ BS 5489-1:2013 Code of Practice for the Design of Road Lighting. Lighting of Roads and Public Amenity Areas. 2013.

¹⁴ Guidance Note 1 for the Reduction of Obtrusive Light. Institute of Lighting Professionals. 2021.

modern installations complying with current standards. As a result of the high levels of artificial light surrounding the Site, the reduction in light spill and glare from the Site is unlikely to be significant.

Cumulative Scenario

- 4.120 It can be assumed that the Cumulative Schemes would also have lighting designs that comply with modern standards as identified above. Accounting for this and the already high levels of artificial light in the surrounding area any change in light spill and glare associated with the Development and Cumulative Schemes together is unlikely to be significant.

Risk of Major Accidents and Disasters

Demolition and Construction

- 4.121 All demolition and construction works would be managed in accordance with best practice environmental management controls and relevant regulations. Furthermore, with standard, tried and tested construction related best practice environmental management controls in place, previous sub-sections demonstrate that the demolition and construction is unlikely to give rise to significant risks associated with contamination and surface water flooding. As such, significant risks of major accidents and disasters during the demolition and construction would not be considered likely.

The Completed Development

- 4.122 The completed and operational Development does not include any land uses that would increase the risk of major accidents and disasters by virtue of being hazardous or operating complex processes. Furthermore, previous sub-sections justify that the completed and operational Development would unlikely give rise to any significant contamination or flood risk. In view of all of the above, significant effects associated with the risk of major accidents and disasters as a result of the completed Development would be unlikely.

Cumulative Scenario

- 4.123 The above statements regarding the Development in isolation are valid for the Cumulative Schemes, given that the nature of the proposals for the Cumulative Schemes are similar being urban residential developments. Consequently, there is no potential for significant cumulative risks of major accidents and disasters during any concurrent demolition and construction works or following completion and operation of the Development and the Cumulative Schemes together.

5. Summary and Conclusions

5.1 The Development has been screened under Schedule 2, Class 10 'Infrastructure Project' Subsection (b) 'Urban development projects'. The screening criteria for this type of development is if:

- The development includes more than 1 hectare of urban development which is not dwelling house development; or
- The development includes more than 150 dwellings; or
- The overall area of the development exceeds 5 hectares.

5.2 As such, an EIA Screening Report has been prepared on this basis. The report has identified the following key points:

- The Site is not located in a 'sensitive area' as defined by the EIA Regulations.
- The Site is considered to improve the urban environment through a high-quality design.
- The potential for significant effects is low and can be adequately dealt with via the standard legislative requirements and the implementation of best practice environmental management controls out-with the EIA regime.
- The effects associated with this type of development are not of a level of magnitude, complexity or significance such that an EIA would be required to evaluate them.

5.3 In addition, Planning Practice Guidance provides guidance on the indicative thresholds for Schedule 2 Class 10 Subsection (b) development to aid local planning authorities to determine whether a project is likely to have significant environmental effects. The relevant indicative threshold 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."

5.4 Taking all of the above into account, the Development is not considered to constitute EIA development.

5.5 In order to confirm this, we request a formal EIA Screening Opinion on the requirement for EIA and would be grateful if LBH would respond by way of a formal EIA Screening Opinion within three weeks.