

**THE LONDON BOROUGH OF HARINGEY
(HIGH ROAD WEST PHASE A)
COMPULSORY PURCHASE ORDER 2023**

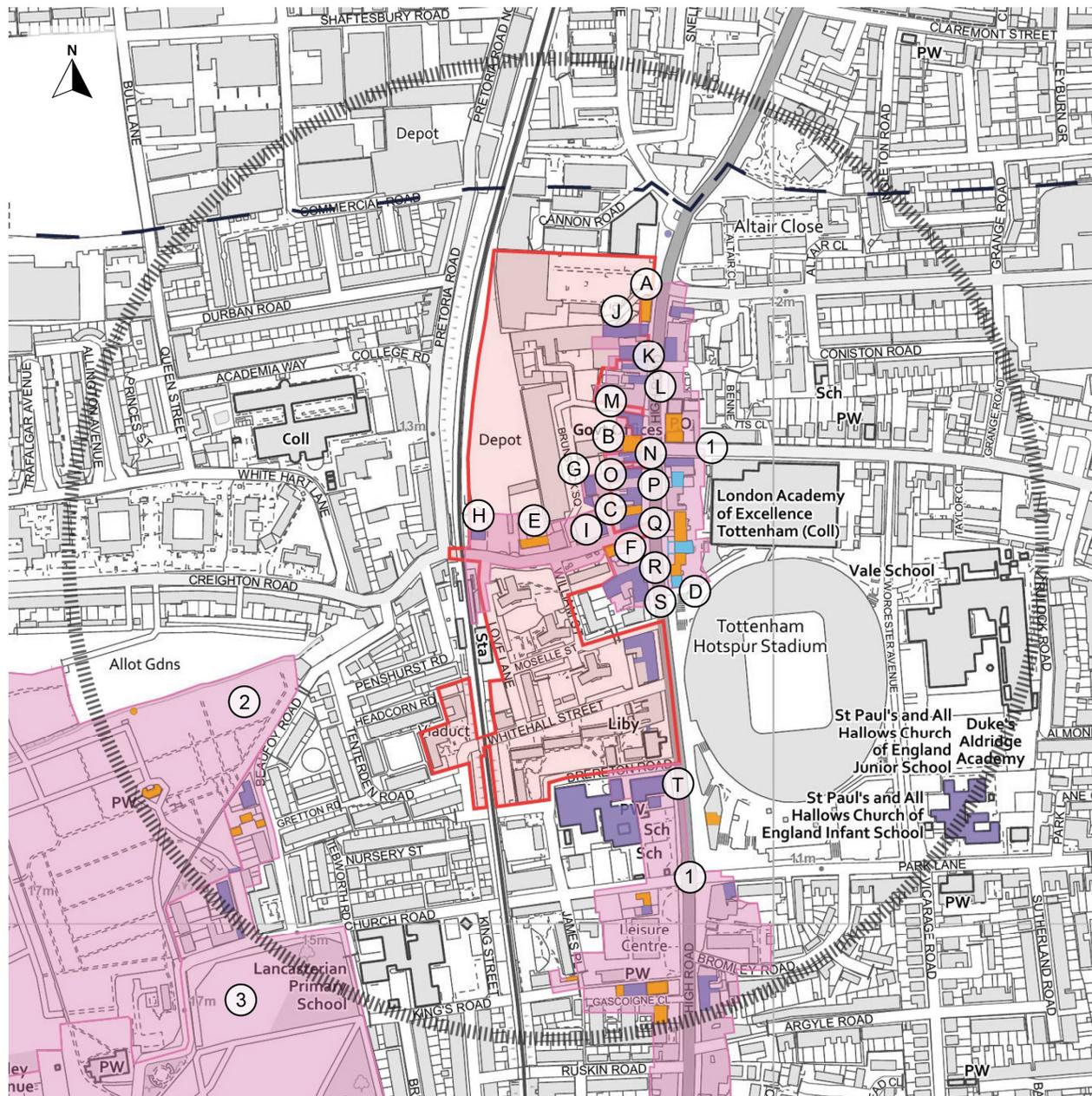
DOCUMENT CD 9.16

**WITNESS 8: MICHAEL DUNN, THE TOWNSCAPE
CONSULTANCY**

APPENDICES TO OVERVIEW PROOF OF EVIDENCE

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Approximate Site boundary marked in red for indicative purposes only. An approximate 500m radius is marked on the map. Heritage assets within this radius are identified.

Conservation areas are marked in pink and identified below.

Borough boundaries are marked with a blue dotted line.

Listed buildings:

- Grade I listed building
- Grade II* listed building
- Grade II listed building

Conservation areas:

- 1 North Tottenham Conservation Area
- 2 Tottenham Cemetery Conservation Area
- 3 Bruce Castle Conservation Area

Locally listed building

Listed buildings affected by the Development:

- A 867-869 Tottenham High Road
- B 819-821 Tottenham High Road
- C 797-799 Tottenham High Road
- D 790 Tottenham High Road
- E 34 White Hart Lane
- F 7 White Hart Lane

Locally listed buildings affected by the Development:

- | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| G Fromer Catholic Chapel and Pastor's House, Chapel Place | N 813-817 Tottenham High Road |
| H 52 White Hart Lane | O 809-811 Tottenham High Road |
| I 6A White Hart Lane | P 801-805 Tottenham High Road |
| J 865 Tottenham High Road | Q 793-795 Tottenham High Road |
| K 847-853 Tottenham High Road | R 773-779 Tottenham High Road |
| L 841-843 Tottenham High Road | S 769-771 and 771A Tottenham High Road |
| M 823-829 Tottenham High Road | T St. Francis de Sales Catholic Church |

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Quod

Environmental Statement Addendum

The Goods Yard and
The Depot, High Road
West

SEPTEMBER 2022

Q200705

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1 Introduction

Purpose

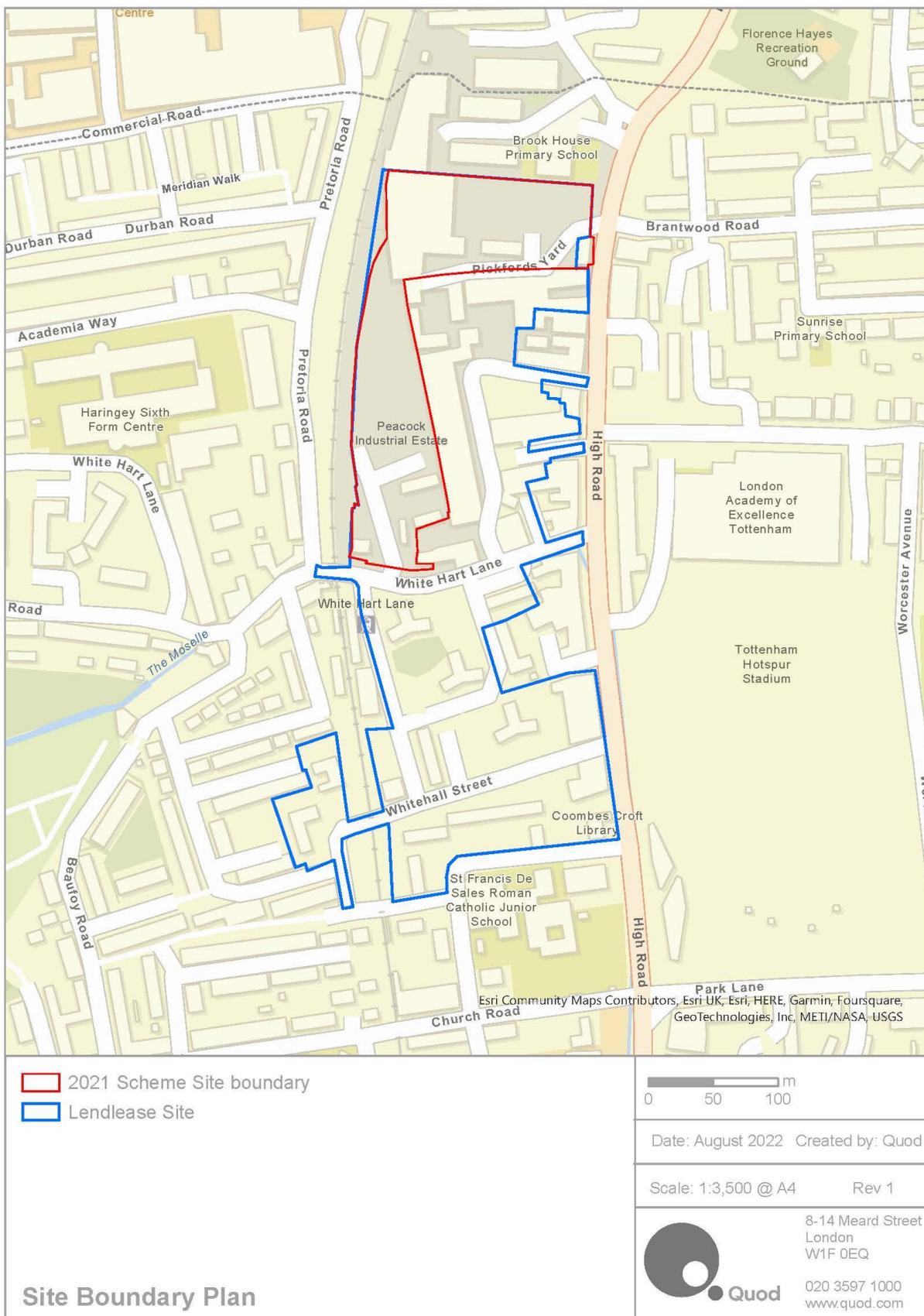
- 1.1 This Environmental Statement (ES) Addendum was prepared by Quod on behalf of Goodsyard Tottenham Limited ('Applicant') and supplements the ES submitted to London Borough of Haringey ('LB Haringey') in June 2021ⁱ ('2021 ES') for residential-led development ('2021 Scheme') of 'The Goods Yard' at 36 and 44-52 White Hart Lane and 'The Depot' at 867-879 High Road, Tottenham ('Site').
- 1.2 In response to a request from the Planning Inspectorate, this ES Addendum provides an additional cumulative assessment of the 2021 Scheme with the High Road West regeneration scheme submitted on behalf of Lendlease (Ref: HGY/2021/3175) ('Lendlease Scheme'), The Lendlease Scheme includes the whole of the Site for the 2021 Scheme and was granted planning permission from LB Haringey on 31st August 2022.
- 1.3 As the 2021 ES was submitted in June 2021, this ES Addendum also considers whether there has been any material change to legislation, policy and guidance, assessment methodology, baseline conditions and proposed mitigation for the 2021 Scheme.
- 1.4 This ES Addendum constitutes 'further information' under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017¹ (as amended²) ('EIA Regulations') since it provides additional information regarding the likely significant effects of the 2021 Scheme. This ES Addendum sets out any changes to the 2021 ES as a result of the EIA review and cumulative effect assessment update. It should be read in conjunction with the 2021 ES. A replacement Non-Technical Summary (NTS) is also provided, which supersedes the NTS submitted with the 2021 ES.

Site Context

- 1.5 The Site is located immediately north of White Hart Lane rail station in north London and is approximately 2.50 hectares (ha) in area. A site boundary plan is shown in Figure 1.1 along with the extent of the Lendlease Scheme ('Lendlease Site').

ⁱ An Addendum to ES Volume II: Townscape and Visual Impact Assessment was also submitted in October 2021 to provide assessment of the submitted scheme proposals in relation to the cladding arrangements and its detail, for the three proposed towers and their coloration, and is taken together to comprise the '2021 ES'.

Figure 1.1: Site Boundary Plan



Planning Context

Planning Policy Context

- 1.6 The Site is partially located in the ‘High Road West’ site allocation under Policy NT5: High Road West of the Tottenham Area Action Plan (AAP)³. The Lendlease Site includes most of this allocation. This site allocation was stated to be able to support in the region of 1,200 net residential units, 4,353 square metres (sqm) of commercial uses, 11,740 sqm of town centre uses and 1,200 sqm other uses. The Tottenham AAP and the High Road West Masterplan Framework (HRWMF)⁴ outline the principles of development for redeveloping the High Road West site.

Planning History

Applicant-related Planning Applications

- 1.7 The Site benefits from two notable planning permissions (‘Extant Consents’):
- The Goods Yard (ref. HGY/2018/0187) – In June 2019, hybrid planning permission was granted for the demolition of some existing structures on the Site and construction of up to 330 residential units, 1,450 sqm of employment, retail, leisure and community uses. Listing building consent (ref. HGY/2019/2930) was also approved for change of use for the locally listed building at No. 52 White Hart Lane (‘Station Master’s House’). The application was accompanied by an ES (‘December 2017’) and ES Addendum (‘April 2018’). This permission has not been implemented.
 - The Depot (ref. HGY/2019/2929) – In September 2020, hybrid planning permission was granted for the demolition of some existing structures on the Site and construction of 325 residential units, together with commercial and amenity uses was approved in September 2020. Listed building consent was also approved for restoration works to the Grade II structures. An EIA Screening opinion was sought, and LB Haringey concluded the scheme was not ‘EIA development’. A suite of environmental technical reports were submitted with the planning application. This permission has not been implemented.
- 1.8 These extant planning consents were designed to be within the maximum development parameters of the HRWMF.
- 1.9 In addition, LB Haringey granted full planning permission and listed building consent to the Applicant for redevelopment of the Printworks, Nos. 819-829 High Road (refs. HGY/2021/2283 & 2284) on 31st August 2022 (‘Printworks Scheme’). These works involved demolition of existing structures and the development of a residential-led, mixed-use development comprising residential units, flexible commercial, business and service uses, a cinema, hard and soft landscaping, parking, and associated works. An EIA Screening opinion was sought, and LB Haringey concluded the scheme was not ‘EIA development’. Both the 2021 ES and the Lendlease ES assessed this development as a cumulative scheme.
- 1.10 The Applicant submitted a detailed planning application in November 2021 (ref: HGY/2021/1771) for the 2021 Scheme to deliver a comprehensive, residential-led development of 867 new residential units in buildings ranging from three to 32 storeys in height

on the Site (i.e. the combined extent of the Goods Yard and Depot sites), supported by the 2021 ESⁱⁱ. This planning application sought permission for:

Full planning application for (i) the demolition of existing buildings and structures, site clearance and the redevelopment of the site for a residential-led, mixed-use development comprising residential units (C3); flexible commercial, business, community, retail and service uses (Class E); hard and soft landscaping; associated parking; and associated works. (ii) Change of use of No. 52 White Hart Lane from residential (C3) to a flexible retail (Class E) (iii) Change of use of No. 867-869 High Road to residential (C3) use.

- 1.11 This application was refused by LB Haringey in December 2021 and is currently subject to a planning appeal (PINS ref: APP/Y5420/W/21/3289690). No design changes have been made to the 2021 Scheme during the appeal process. A full description of the 2021 Scheme is provided in Chapter 5: Description of Development of the 2021 ES.
- 1.12 The planning application was supported by the 2021 ES. This contains such information referred to in Part 1 and Part 2 of the EIA Regulations and reports on an assessment of the likely significant effects of the 2021 Scheme, its purpose being to inform the decision-making process in respect of the detailed planning application. This ES Addendum should be read in conjunction with the 2021 ES.

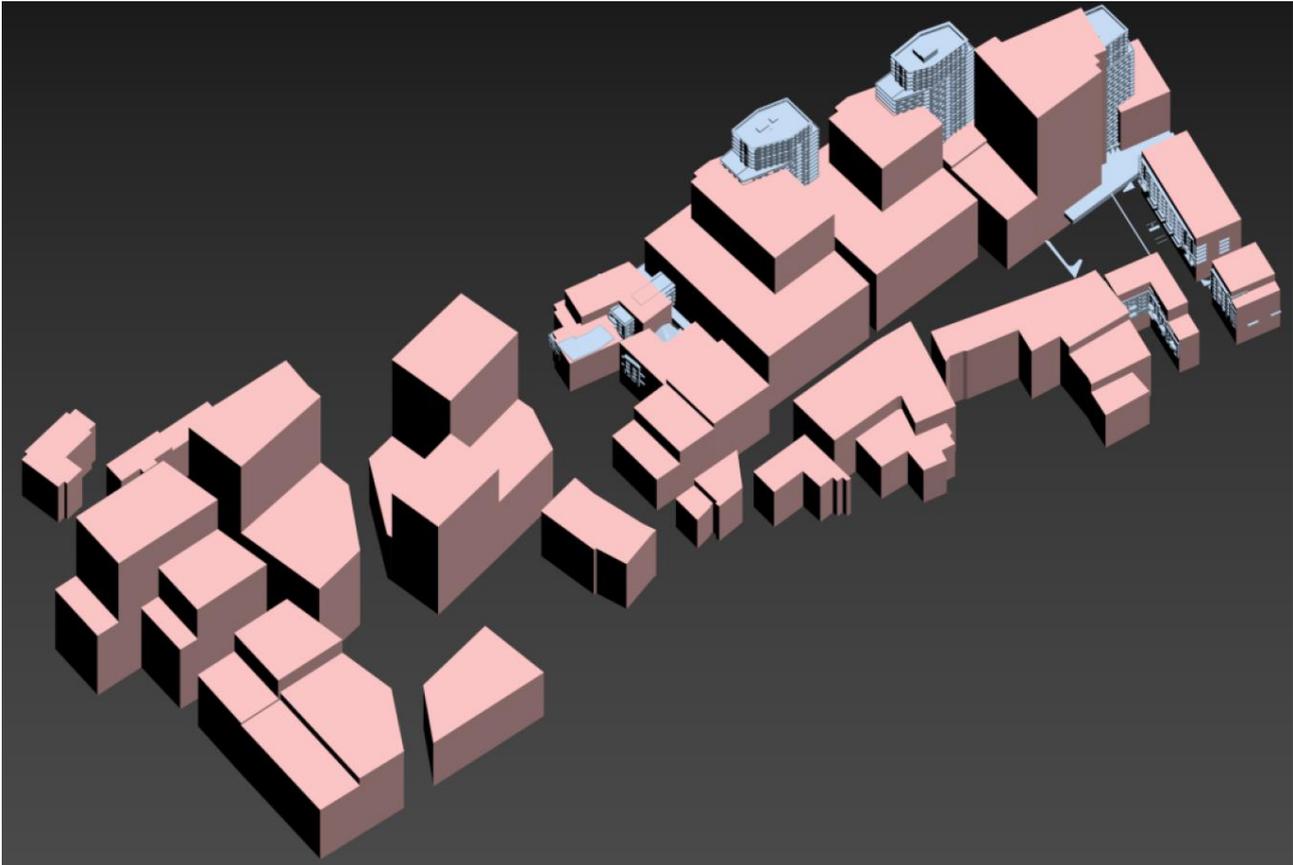
The Lendlease Scheme

- 1.13 LB Haringey granted hybrid (part outline/part detailed) planning permission for the Lendlease Scheme on 31st August 2022. The Lendlease Scheme encompasses the Site and was formulated to incorporate parameters of the Extant Consents for the Goods Yard and The Depot sites. It was supported by the Lendlease ESⁱⁱⁱ.
- 1.14 The maximum extents of height and massing of the outline part of the Lendlease Scheme are defined by a suite of parameter plans. These are supplemented with design codes and an illustrative massing has also been provided to assist with the interpretation of the parameters. The Lendlease Scheme exceeds the maximum height and massing parameters of the Extant Consents in several places. The 2021 Scheme exceeds the maximum parameters of the Lendlease Scheme in some places. This is shown in Figure 1.2.

ⁱⁱ Archived at:
<http://www.planningservices.haringey.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=407391>

ⁱⁱⁱ Archived at:
<http://www.planningservices.haringey.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=415912>

Figure 1.2: Comparison of Proposed Massing of 2021 Scheme (blue) and Lendlease Scheme Maximum Parameter Envelope (pink)



1.15 The Lendlease application was supported by an ES ('Lendlease ES'), submitted in October 2021, that assessed the maximum parameters of the development proposals and was considered adequate by LB Haringey to inform their decision making. This was supplemented by ES Addenda in January and May 2022 that provided further assessment, updated its cumulative assessment, and provided Interim Scenarios in the event that the southern half of the Lendlease Scheme came forward on its own alongside the Extant Consents. The Lendlease ES (as amended) has therefore inherently assessed the cumulative effects of the Extant Schemes and the Printworks Scheme. As illustrated in Table 1.1, the 2021 Scheme is only marginally greater in scale and massing than the Extant Schemes.

Table 1.1: Comparison of Extant Schemes and 2021 Scheme

Aspect of Development	Extant Schemes (Goods Yard ('GY') and Depot combined)	2021 Scheme	Difference
Total floorspace (inc. basement)	Up to 69,167 sqm (31,000 sqm GY/ 38,167sqm Depot)	92,217 sqm	+23,050 sqm
Residential units	Up to 646 (316 GY/ 330 Depot)	867	+221 units
Non-residential (commercial / amenity) floorspace	Up to 1,720 sqm (1,450 sqm GY/ Up to 270 sqm Depot)	1,878 sqm	+ 158 sqm

Aspect of Development	Extant Schemes (Goods Yard ('GY') and Depot combined)	2021 Scheme	Difference
Open space	11,180 sqm (4,800 sqm GY/ 6,380 sqm Depot)	15,650 sqm	+ 4,470 sqm
Playspace	Up to 2,610 sqm (1,360 sqm GY/ up to 1,250 sqm Depot)	2,900 sqm	+ 290 sqm
Maximum Building Heights	GY Block B1 - 24 storeys; Depot - 29 storeys	GY Block A - 32 storey; Depot Block A – 29 storeys	+ 3 storeys

ES Addendum Structure

1.16 The structure of this ES Addendum is as follows:

ES Addendum

Chapter 1	Introduction
Chapter 2	Approach and Methodology
Chapter 3	Review of 2021 ES

Appendices

Appendix 1.1	Cumulative Schemes
Appendix 3.1	Daylight, Sunlight and Overshadowing Analysis
Appendix 3.2	Visual Receptor Analysis
Appendix 3.3	Updated Cumulative AVRs

Replacement Non-Technical Summary

Competence

- 1.17 As defined by Part 18(5)(a) of the EIA Regulations, the ES Addendum must be prepared by “competent experts”.
- 1.18 This ES Addendum has been undertaken by the same project team listed in Chapter 1: Introduction of the 2021 ES. Each member of the project team is a suitably qualified professional and a statement outlining the relevant experience and qualifications is provided in each technical chapter of the 2021 ES (Chapters 7 to 11 and Volume II).

ES Addendum Availability

- 1.19 The ES Addendum documents are available online. Hard copies of the ES Addendum can be provided on request (at a reasonable fee). Alternatively, a memory stick of the ES and ES Addendum is available for a fee of £15 from Quod. The Non-Technical Summary can be obtained free of charge upon request in hard copy or electronic copy. All ES documents are available by calling Quod at 020 3597 1000 quoting Reference No. Q200705 or emailing reception@quod.com.

2 Approach and Methodology

Overview of Approach

- 2.1 A review of the 2021 ES has been undertaken to establish whether any material updates are required to the cumulative assessments undertaken previously as a result in the resolution to grant permission for the Lendlease Scheme.
- 2.2 A qualitative approach has been adopted, with the following stages of assessment applied for each technical topic:
- Review of the relevant legislation, policy and guidance for applicable updates with a view to whether the methodology of the 2021 ES is valid;
 - Determine any material changes to the 2020/2021 baseline considered;
 - Review of the cumulative schemes (see section below for further detail);
 - Assessment of whether the environmental effects differ from those reported in the 2021 ES and if they are of a type and scale likely to give rise to new or materially different significant environmental effects; and
 - Review of adequacy of mitigation measures proposed for the 2021 Scheme taking into account the conclusions of the above assessments.

Scope

- 2.3 A review has been carried out to define a proportionate scope for this ES Addendum. The scope of the ES Addendum comprises:
- Legislation, policy and guidance review, and consideration of subsequent implications on assessment methodology; and
 - Cumulative assessment of the 2021 Scheme in-combination with the Lendlease Scheme.
- 2.4 Table 2.1 provides the reasoning why further assessment or updates are not required in relation to other aspects of the ES 2021.

Table 2.1: Aspects Scoped Out of ES Addendum

Element of EIA	Rationale
Alternatives	In accordance with the EIA Regulations, the 2021 ES provided a chapter (Chapter 4: Alternatives) which described the 'reasonable alternatives' to the 2021 Scheme studied by the Applicant, prior to the selection of the final design and provided an indication of the main reasons for selection the final chose option, including a comparison of the environmental effects. As there have been no changes to the design of the 2021 Scheme and the Lendlease Scheme has been designed to be compatible with the delivery of the Extant Consents, there is no requirement for further consideration of alternatives in

Element of EIA	Rationale
	this ES Addendum and it is scoped out of further assessment in this ES Addendum.
Baseline scenario and assumptions	Given the limited time that has lapsed since the 2021 ES was prepared, the baseline as set out in the 2021 ES remains valid for all topics assessed. Further narrative on the baseline is therefore not provided for the technical reviews.
EIA – Assessment Methodology	The assessment methodology described in the 2021 ES remains valid, both in approach to the EIA process and across the specific topic assessments described in the technical ES chapters (7 – 11 and Volume II: TVIA). No further commentary is provided on assessment methodology in this ES Addendum.
EIA – Likely Significant Effects of 2021 Scheme	Given that no material changes have been identified to the policy regime, baseline conditions or assessment methodology for the topics assessed, no changes to the significance of residual effects stated for the 2021 Scheme in the 2021 ES are expected. These are not discussed further.
Demolition and Construction Assessment	<p>Chapter 6: Demolition and Construction of the 2021 ES describes the indicative construction process for the demolition, enabling and construction works and the key activities that will be undertaken prior to completion and occupation of the 2021 Scheme. It also provides an outline indicative construction programme and phasing.</p> <p>The 2021 ES predicted construction to start in 2022; however, the indicative construction programme is now expected to commence at the end of 2022, given the delay in gaining planning consent. The completion date is expected to remain the same (2028). All other information provided in Chapter 6: Demolition and Construction of the 2021 ES remains valid and there are not considered to be any material changes to the assessment of environmental effects resultant from this change in construction programme.</p>
Cumulative Assessment: Intra-project Effects ^{iv}	Intra-project effects were assessed within a discrete chapter of the 2021 ES (Chapter 12: Effect Interactions) and inter-project effects were assessed within each technical chapter (Chapters 7 – 11 and Volume II). A review has been undertaken of the 2021 ES cumulative assessment and the potential for additional effects that may have come forward since this time. No changes to intra-project effects are expected.

2.5 The Lendlease ES assessed additional topics to those considered in the 2021 ES, as agreed during the scoping process based on the potential for likely significant effects. These topics were Air Quality; Greenhouse Gases and Climate Change; Ground Condition and Contamination; Ecology and Biodiversity; Noise and Vibration; and Transport and Access. No significant cumulative effects were identified within the Lendlease ES for these topics with the exception of minor to moderate adverse from demolition and construction noise. With

^{iv} The combined effects of individual effects resultant from the proposed development upon a set of defined sensitive receptors, for example, noise, dust and visual effects.

mitigation measures in place (e.g. adherence to CEMPs), no significant cumulative effects are expected to arise for the 2021 Scheme in cumulation with the Lendlease Scheme and therefore it is not considered necessary to provide further consideration of these topics in this ES Addendum.

ES Addendum Methodology

Legislation, Policy and Guidance

- 2.6 A qualitative review has been undertaken and a statement provided on the status of applicable legislation, planning policy and guidance for each technical topic assessed in the 2021 ES. This makes clear if the previously assessed basis of topic assessment is still valid or, if new legislation, policy or guidance has since been adopted that is pertinent to the assessment, details are provided.

Cumulative Assessment

Cumulative Schemes

- 2.7 The 2021 ES provided an assessment of inter-project cumulative effects. These are defined as the combined effects arising from another development site(s), which individually might be insignificant, but when considered together, could create a significant cumulative effect.
- 2.8 A data search of the LB Haringey and London Borough of Enfield planning portals has been carried out in August 2022 using the same criteria as set out in the 2021 ES (Chapter 3: EIA Methodology). Three new planning consents have been granted since submission of the 2021 ES that were not assessed at that time. These are:
- the Lendlease Scheme;
 - 79 Fore Street (ref: 17/05524/FUL) - erection of a three-storey extension; and
 - 810-812 High Road (ref: HGY/2017/1181) - change of use.
- 2.9 Given the relatively small scale of 79 Fore Street and the 810-812 High Road schemes and proximity to the Site, they are not considered to give rise to material cumulative effects so are not considered further in this ES Addendum.
- 2.10 Therefore, the cumulative assessment in this ES Addendum focusses on the potential for in-combination effects with the Lendlease Scheme only.
- 2.11 None of the cumulative schemes considered in the 2021 ES have been completed; therefore, they do not require consideration in the baseline scenario. An updated list of cumulative schemes including status of development is provided in Appendix 1.1, with updates to the table shown in red and green.

Lendlease Scheme

- 2.12 As there was no submitted planning application for High Road West at the time of submission of the 2021 Scheme, the Lendlease Scheme was not assessed within the 2021 ES. Instead, the 2021 ES provided, on a topic-by topic basis where appropriate, a qualitative cumulative assessment of the maximum parameters for development of the area as defined by policy, i.e. the HRWMF). This ES Addendum provides an assessment of the likely significant cumulative

effects of the 2021 Scheme in-combination with the Lendlease Scheme. The methodology for this cumulative assessment is set out below.

- 2.13 In the Lendlease ES (as amended), residual cumulative effects of minor adverse significance or greater were only identified for the demolition and construction phase for socio-economic receptors. As such, the potential for cumulative effects during this period is only assessed in relation to this topic in this ES Addendum. The potential for cumulative effects during the operational phase is considered for all topics, except for archaeology which was scoped out of the 2021 ES.
- 2.14 A qualitative assessment has been undertaken, based on available information and professional judgment. As defined by Part (18)(4)(c) of the EIA Regulations, the use of other assessments and associated environmental information already available to the Applicant and LB Haringey is deemed adequate to use in the assessment of potential significant effects of the 2021 Scheme. A review of the Lendlease ES has been undertaken by the Applicant's appointed technical specialists. As the conclusions of the Lendlease ES were accepted by LB Haringey, reliance has been placed on those conclusions within this ES Addendum.
- 2.15 The cumulative assessment provided in Chapter 17 of the Lendlease ES and its conclusions form the basis of the qualitative assessment undertaken within this ES Addendum, coordinated with a review of the residual effects identified for the 2021 Scheme in isolation. Taking into context the limited extent of the uplift in amount of floorspace and massing of the 2021 Scheme relative to the Extant Consents (as detailed in Table 1.1) inherent within the Lendlease Scheme, statements are provided on the potential cumulative effects of the 2021 Scheme in-combination with the Lendlease Scheme.

Topic assessed in the 2021 ES	Implications on the 2021 ES Topic Chapter
	<p>Overall, minor adverse to moderate beneficial cumulative wind effects are anticipated taking into account the Lendlease Scheme with the 2021 Scheme, as modelled without mitigation. Any potential adverse effects identified in this ES Addendum are considered to be capable of being sufficiently mitigated by the embedded mitigation defined by the landscaping strategy of the Lendlease Scheme. No new or materially different mitigation or monitoring measures are considered necessary to address potential wind effects to those stated in the 2021 ES.</p>
Built Heritage	<p>Review of Policy Context, Legislation, Guidance and Standards</p> <p>Since the 2021 ES, the NPPF and Historic England (HE) Advice Note 4: Tall Buildings⁷ have been revised. However, these updates have no material implications on the built heritage assessment. There have been no other changes to policy, legislation and guidance since the 2021 ES.</p> <p>In heritage best practice guidance (HE Good Practice Advice Note 3)⁸, there is specific reference to <i>“cumulative changes”</i>. The word ‘cumulative’ in this context should be taken to mean incremental, judged on a qualitative basis. This ES Addendum applies this guidance, consistent with approach applied in the Lendlease ES.</p> <p>Cumulative Effects of Lendlease Scheme – Completed Development</p> <p>A number of the receptors assessed in the Lendlease ES have not been considered in this ES Addendum as they are not within the zone of influence of the 2021 Scheme. As such, the cumulative assessment is limited to the potential effects on built heritage assets identified in the 2021 ES.</p> <p>During the construction phase, the 2021 ES identified potential for minor adverse cumulative effects on 819-821 High Road and minor adverse to negligible cumulative effects North Tottenham Conservation Area during the construction phase. No cumulative effects were identified on built heritage receptors for the operational phase.</p> <p>The Lendlease ES concluded the following cumulative effects on built heritage assets:</p> <ul style="list-style-type: none"> ▪ Conservation Areas (CAs): <ul style="list-style-type: none"> ▪ Bruce Castle and All Hallows CA: Negligible neutral to minor adverse; and ▪ North Tottenham CA: Moderate adverse.

Topic assessed in
the 2021 ES

Implications on the 2021 ES Topic Chapter

- Listed Buildings:
 - The Grange: Minor adverse to moderate adverse;
 - 797 – 799 High Road: Minor adverse;
 - 819 – 821 High Road: Minor adverse to moderate adverse;
 - 867 – 869 High Road: Minor adverse; and
 - Former Station Master’s House: Minor adverse.

Compared to the Lendlease Scheme, the 2021 Scheme would introduce an additional presence of built form experienced behind the White Hart Lane/High Road frontages, although this is marginal in the context of the extent of the Lendlease Scheme. The additional built form of the 2021 Scheme seen in conjunction with the Lendlease Scheme would be distant and marginal, and would not cause any additional cumulative impacts to those stated in the Lendlease ES, especially in the context of considerations such as changes to character, silhouette, built form and the presence of new large scale development behind the White Hart Lane/High Road frontages. Given the incremental uplift of the 2021 Scheme in the context of the Lendlease Scheme (Figure 1.2), it is not anticipated that the 2021 Scheme would lead to a material change on the significance of cumulative effects for the North Tottenham, Bruce Castle and All Hallows Conservation Areas and the setting of listed and locally listed buildings (The Grange, 797 – 799 High Road, 819 – 821 High Road, 867 – 869 High Road and the Station Master’s House) stated in the Lendlease ES. Accordingly, negligible neutral to moderate adverse cumulative effects are anticipated on built heritage assets from the Lendlease Scheme and the 2021 Scheme with other cumulative schemes.

Review of Mitigation and Monitoring Measures

Based on the findings set out in this ES Addendum, there are no new or materially different mitigation or monitoring measures required to mitigate potential built heritage effects to those stated in the 2021 ES, taking into account the potential cumulative effects of the Lendlease Scheme. As set out in Section 8 of Volume 3: Heritage, Townscape and Visual Impact Assessment (HTVIA) of the Lendlease ES, mitigation principles have been integrated into the application’s Design Code pertaining to the outline areas of the permission to ensure that future Reserved Matters Applications (RMAs) providing sufficient information and design mitigation to mitigate adverse cumulative effects on built heritage assets.



Quod

Environmental Statement Addendum

The Goods Yard and
The Depot, High Road
West

MAY 2023

Q200705

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1 Introduction

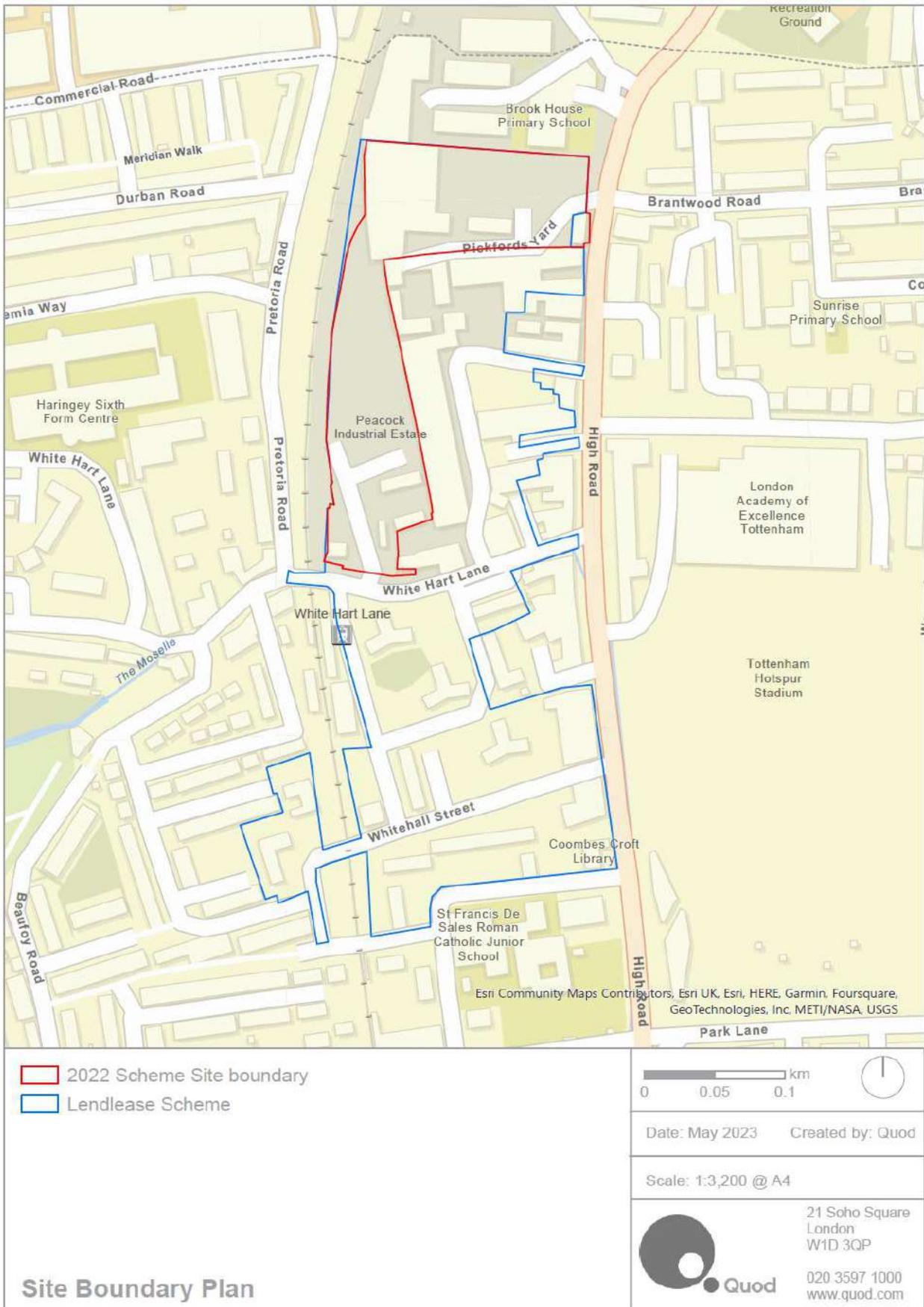
Purpose

- 1.1 This Environmental Statement ('ES') Addendum was prepared by Quod on behalf of Goodsyard Tottenham Limited ('Applicant') and supplements the ES submitted to London Borough of Haringey ('LB Haringey') in February 2022 ('2022 ES') for the consented residential-led development ('2022 Scheme') of 'The Goods Yard' at 36 and 44-52 White Hart Lane and 'The Depot' at 867-879 High Road, Tottenham ('Site') (ref: HGY/2021/1771).
- 1.2 This ES Addendum provides an assessment of potential implications of the proposed changes discussed in Table 4.1 (the 'Amended Scheme') and an additional cumulative assessment of the Amended Scheme with the High Road West regeneration scheme submitted on behalf of Lendlease (Ref: HGY/2021/3175) ('Lendlease Scheme'). The Lendlease Scheme includes the whole of the Site for the 2022 Scheme and was granted planning permission from LB Haringey on 31st August 2022.
- 1.3 As the 2022 ES was submitted in February 2022, this ES Addendum also considers whether there has been any material change to legislation, policy and guidance, assessment methodology, baseline conditions and proposed mitigation for the 2022 Scheme.
- 1.4 This ES Addendum constitutes 'further information' under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017¹ (as amended²) ('EIA Regulations') since it provides additional information regarding the likely significant effects of the 2021 Scheme. This ES Addendum sets out any changes to the 2022 ES as a result of the EIA review and assessment updates. It should be read in conjunction with the 2022 ES. A replacement Non-Technical Summary (NTS) is also provided, which supersedes the NTS submitted with the 2022 ES.

Site Context

- 1.5 The Site is located immediately north of White Hart Lane rail station in north London and is approximately 2.5 hectares (ha) in area. A site boundary plan is shown in Figure 1.1 along with the extent of the Lendlease Scheme ('Lendlease Site').

Figure 1.1: Site Boundary Plan



Planning Context

Planning Policy Context

- 1.6 The Site is partially located in the ‘High Road West’ site allocation under Policy NT5: High Road West of the Tottenham Area Action Plan (AAP)³. The Lendlease Site includes most of this allocation. This site allocation was stated to be able to support in the region of 1,200 net residential units, 4,353 square metres (sqm) of commercial uses, 11,740 sqm of town centre uses and 1,200 sqm other uses. The Tottenham AAP and the High Road West Masterplan Framework (HRWMF)⁴ outline the principles of development for redeveloping the High Road West site.

Planning History

Applicant-related Planning Applications

- 1.7 The Site benefits from three notable planning permissions (‘Extant Consents’):
1. The Goods Yard (ref. HGY/2018/0187) – In June 2019, hybrid planning permission was granted for the demolition of some existing structures on the Site and construction of up to 330 residential units, 1,450 sqm of employment, retail, leisure and community uses (‘Extant Consent 1’). Listing building consent (ref. HGY/2019/2930) was also approved for change of use for the locally listed building at No. 52 White Hart Lane (‘Station Master’s House’). The application was accompanied by an ES (‘December 2017’) and ES Addendum (‘April 2018’). This permission has not been implemented.
 2. The Depot (ref. HGY/2019/2929) – In September 2020, hybrid planning permission was granted for the demolition of some existing structures on the Site and construction of 325 residential units, together with commercial and amenity uses was approved in September 2020 (‘Extant Consent 2’). Listed building consent was also approved for restoration works to the Grade II structures. An EIA Screening opinion was sought, and LB Haringey concluded the scheme was not ‘EIA development’. A suite of environmental technical reports were submitted with the planning application. This permission has not been implemented.
 3. The Goods Yard and The Depot (ref: HGY/2021/1771) – In November 2021, a detailed planning application was submitted seeking permission to deliver a comprehensive, residential-led development of 867 new residential units in buildings ranging from three to 32-storeys in height on the Site (i.e. the combined extent of the Goods Yard and Depot sites) (‘Extant Consent 3’). This application was supported by the 2021 ES¹ (‘2021’ Scheme) and was approved by the Planning Inspectorate at planning appeal in October 2022, . The appeal was accompanied by both the 2021 ES and the ‘Appeal Addendum’.
- 1.8 Extant planning consents 1 and 2 were designed to be within the maximum development parameters of the HRWMF.
- 1.9 LB Haringey also granted full planning permission and listed building consent to the Applicant for redevelopment of the Printworks, Nos. 819-829 High Road (refs. HGY/2021/2283 & 2284) on 31st August 2022 (‘Printworks Scheme’). These works involved demolition of existing

¹ Archived at: https://publicregister.haringey.gov.uk/pr/s/planning-application/a0i8d000002GCeyAAG/hgy20211771?c_r=Arcus_BE_Public_Register&tabset-3892f=3

structures and the development of a residential-led, mixed-use development comprising residential units, flexible commercial, business and service uses, a cinema, hard and soft landscaping, parking, and associated works. An EIA Screening opinion was sought, and LB Haringey concluded the scheme was not 'EIA development'. Both the 2022 ES and the Lendlease ES assessed this development as a cumulative scheme.

2022 Scheme

- 1.10 In February 2022, the Applicant submitted a detailed planning application for the 2022 Scheme (ref: HGY/2022/0563) to deliver a comprehensive, residential-led development of 844 new residential units in buildings ranging from three to 31-storeys in height on the Site (i.e. the combined extent of the Goods Yard and Depot sites), supported by the 2022 ES². This planning application sought permission for:

“Full planning application for (i) the demolition of existing buildings and structures, site clearance and the redevelopment of the site for a residential-led, mixed-use development comprising residential units (C3); flexible commercial, business, community, retail and service uses (Class E); hard and soft landscaping; associated parking; and associated works. (ii) Change of use of No. 52 White Hart Lane from residential (C3) to a flexible retail (Class E) (iii) Change of use of No. 867-869 High Road to residential (C3) use.”

- 1.11 This application is pending a planning decision by LB Haringey.
- 1.12 The planning application was supported by the 2022 ES and is the subject of this ES Addendum. This contains such information referred to in Part 1 and Part 2 of the EIA Regulations and reports on an assessment of the likely significant effects of the 2022 Scheme, its purpose being to inform the decision-making process in respect of the detailed planning application. This ES Addendum should be read in conjunction with the 2022 ES.

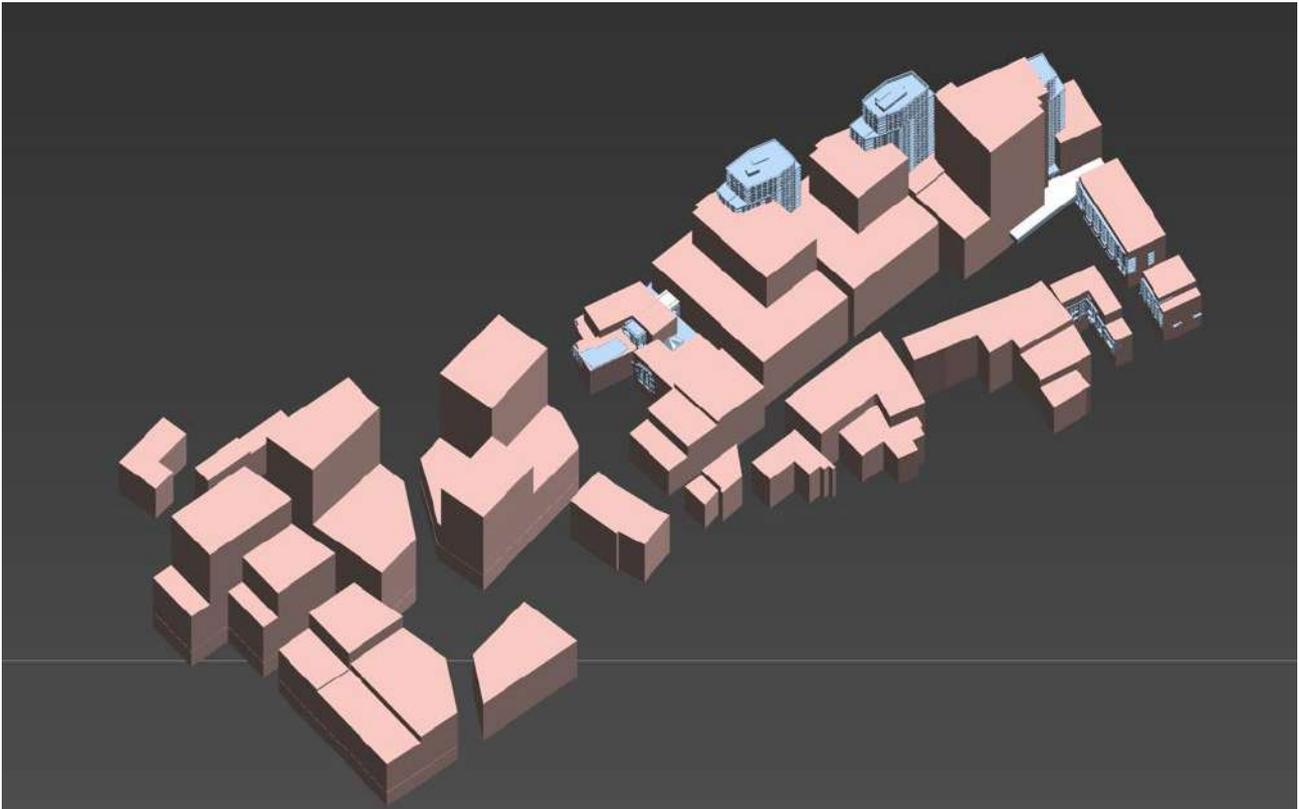
The Lendlease Scheme

- 1.13 LB Haringey granted hybrid (part outline/part detailed) planning permission for the Lendlease Scheme on 31st August 2022. The Lendlease Scheme encompasses the Site and was formulated to incorporate parameters of the Extant Consents for the Goods Yard and The Depot sites. It was supported by the Lendlease ES³.
- 1.14 The maximum extents of height and massing of the outline part of the Lendlease Scheme are defined by a suite of parameter plans. These are supplemented with design codes and an illustrative massing has also been provided to assist with the interpretation of the parameters. The Lendlease Scheme exceeds the maximum height and massing parameters of the Extant Consents 1 and 2 in several places. The Amended Scheme exceeds the maximum parameters of the Lendlease Scheme in some places. This is shown in Figure 1.2.

² Archived at: https://publicregister.haringey.gov.uk/pr/s/planning-application/a0i8d000002GBkcAAG/hgy20220563?c_r=Arcus_BE_Public_Register

³ Archived at: https://publicregister.haringey.gov.uk/pr/s/planning-application/a0i8d000002GCavAAG/hgy20213175?c_r=Arcus_BE_Public_Register

Figure 1.2: Comparison of Proposed Massing of Amended Scheme (blue) and Lendlease Scheme Maximum Parameter Envelope (pink)



1.15 The Lendlease application was supported by an ES ('Lendlease ES'), submitted in October 2021, that assessed the maximum parameters of the development proposals and was considered adequate by LB Haringey to inform their decision making. This was supplemented by ES Addenda in January and May 2022 that provided further assessment, updated its cumulative assessment, and provided Interim Scenarios in the event that the southern half of the Lendlease Scheme came forward on its own alongside the Extant Consents 1 and 2. The Lendlease ES (as amended) has therefore inherently assessed the cumulative effects of the Extant Schemes (1 and 2) and the Printworks Scheme. As illustrated in Table 1.1, the Amended Scheme is only marginally greater in scale and massing than Extant Schemes 1 and 2.

Table 1.1: Comparison of Extant Schemes 1 & 2 and Amended Scheme

Aspect of Development	Extant Schemes 1 and 2 (Goods Yard ('GY') and Depot)	Amended Scheme	Difference
Total residential floorspace (inc. basement)	Up to 69,167 sqm (31,000 sqm GY/ 38,167sqm Depot)	86,903 sqm	+ 17,736 sqm
Residential units	Up to 646 (316 GY/ 330 Depot)	844	+ 198 units
Non-residential (commercial / amenity) floorspace	Up to 1,720 sqm (1,450 sqm GY/ Up to 270 sqm Depot)	2,068 sqm	+ 348 sqm

Aspect of Development	Extant Schemes 1 and 2 (Goods Yard ('GY') and Depot)	Amended Scheme	Difference
Open space	11,180 sqm (4,800 sqm GY/ 6,380 sqm Depot)	15,630 sqm	+ 4,450 sqm
Playspace	Up to 2,610 sqm (1,360 sqm GY/ up to 1,250 sqm Depot)	2,900 sqm	+ 290 sqm
Maximum Building Heights	GY Block B1 - 24 storeys; Depot - 29 storeys	GY Block A - 32 storey; Depot Block A – 29 storeys	+ 3 storeys

ES Addendum Structure

1.16 The structure of this ES Addendum is as follows:

ES Addendum

Chapter 1	Introduction
Chapter 2	Approach and Methodology
Chapter 3	Proposed Amendments to the 2022 Scheme
Chapter 4	Alternatives
Chapter 5	Review of 2022 ES

Appendices

Appendix 1.1	Cumulative Schemes
Appendix 5.1	Daylight, Sunlight and Overshadowing Analysis
Appendix 5.2	Addendum ES Volume II: TVIA

Replacement Non-Technical Summary

Competence

- 1.17 As defined by Part 18(5)(a) of the EIA Regulations, the ES Addendum must be prepared by “competent experts”.
- 1.18 This ES Addendum has been undertaken by the same project team listed in Chapter 1: Introduction of the 2022 ES. Each member of the project team is a suitably qualified professional and a statement outlining the relevant experience and qualifications is provided in each technical chapter of the 2022 ES (Chapters 7 to 11 and Volume II).

ES Addendum Availability

- 1.19 The ES Addendum documents are available online. Hard copies of the ES Addendum can be provided on request (at a reasonable fee). Alternatively, a memory stick of the ES and ES Addendum is available for a fee of £15 from Quod. The Non-Technical Summary can be obtained free of charge upon request in hard copy or electronic copy. All ES documents are available by calling Quod at 020 3597 1000 quoting Reference No. Q200705 or emailing reception@quod.com.

2 Approach and Methodology

Overview of Approach

- 2.1 A review of the 2022 ES has been undertaken to establish whether any material updates are required to the cumulative assessments undertaken previously as a result in the resolution to grant permission for the Lendlease Scheme.
- 2.2 A qualitative approach has been adopted, with the following stages of assessment applied for each technical topic:
- Review of the relevant legislation, policy and guidance for applicable updates with a view to whether the methodology of the 2022 ES is valid;
 - Determine any material changes to the baseline considered;
 - Review of the cumulative schemes (see section below for further detail);
 - Assessment of whether the environmental effects differ from those reported in the 2022 ES and if they are of a type and scale likely to give rise to new or materially different significant environmental effects; and
 - Review of adequacy of mitigation measures proposed for the 2022 Scheme taking into account the conclusions of the above assessments.

Scope

- 2.3 A review has been carried out to define a proportionate scope for this ES Addendum. The scope of the ES Addendum comprises:
- Consideration of Alternatives to the Amended Scheme;
 - Legislation, policy and guidance review, and consideration of subsequent implications on assessment methodology;
 - Consideration and review of baseline scenarios and assumptions;
 - Review of any changes to the likely significant effects as stated in the 2022 ES;
 - Review of the Demolition and Construction programme - The 2022 ES predicted construction to start in 2023 and reach completion in 2028. This remains the same and therefore all other information provided in Chapter 6: Demolition and Construction of the 2022 ES remains valid; and
 - Cumulative assessment of the Amended Scheme in-combination with the Lendlease Scheme.
- 2.4 The Lendlease ES assessed additional topics to those considered in the 2022 ES, as agreed during the scoping process based on the potential for likely significant effects. These topics were Air Quality; Greenhouse Gases and Climate Change; Ground Condition and Contamination; Ecology and Biodiversity; Noise and Vibration; and Transport and Access. No significant cumulative effects were identified within the Lendlease ES for these topics with the exception of minor to moderate adverse from demolition and construction noise. With mitigation measures in place (e.g. adherence to CEMPs), no significant cumulative effects are

expected to arise for the 2022 Scheme in cumulation with the Lendlease Scheme and therefore it is not considered necessary to provide further consideration of these topics in this ES Addendum.

ES Addendum Methodology

Legislation, Policy and Guidance

- 2.5 A qualitative review has been undertaken and a statement provided on the status of applicable legislation, planning policy and guidance for each technical topic assessed in the 2022 ES. This makes clear if the previously assessed basis of topic assessment is still valid or, if new legislation, policy or guidance has since been adopted that is pertinent to the assessment, details are provided.

Cumulative Assessment

Cumulative Schemes

- 2.6 The 2022 ES provided an assessment of inter-project cumulative effects. These are defined as the combined effects arising from another development site(s), which individually might be insignificant, but when considered together, could create a significant cumulative effect.
- 2.7 A data search of the LB Haringey and London Borough of Enfield planning portals has been carried out in May 2023 using the same criteria as set out in the 2022 ES (Chapter 3: EIA Methodology). Three new planning consents have been granted since submission of the 2022 ES that were not assessed at that time. These are:
- the Lendlease Scheme (ref: HGY/2021/3175) – outline permission for masterplan of High Road West area;
 - 79 Fore Street (ref: 17/05524/FUL) - erection of a three-storey extension; and
 - 810-812 High Road (ref: HGY/2017/1181) - change of use.
- 2.8 Given the relatively small scale of 79 Fore Street and the 810-812 High Road schemes and proximity to the Site, they are not considered to give rise to material cumulative effects so are not considered further in this ES Addendum.
- 2.9 Therefore, the cumulative assessment in this ES Addendum focusses on the potential for in-combination effects with the Lendlease Scheme only. A cumulative assessment with the 2022 Scheme is not provided as the 2022 Scheme and the Amended Scheme could not come forward together.
- 2.10 None of the cumulative schemes considered in the 2022 ES have been completed; therefore, they do not require consideration in the baseline scenario. An updated list of cumulative schemes including status of development is provided in Appendix 1.1. The TVIA has included an assessment of the emerging development on the Joyce and Snells Estates site in Enfield (Ref. 22/03346/OUT) (see Appendix 1.1 for further details on this application).

Lendlease Scheme

- 2.11 As there was no submitted planning application for High Road West at the time of submission of the 2022 Scheme, the Lendlease Scheme was not assessed within the 2022 ES. Instead,

the 2022 ES provided, on a topic-by topic basis where appropriate, a qualitative cumulative assessment of the maximum parameters for development of the area as defined by policy, i.e. the HRWMF). This ES Addendum provides an assessment of the likely significant cumulative effects of the 2022 Scheme in-combination with the Lendlease Scheme. The methodology for this cumulative assessment is set out below.

- 2.12 In the Lendlease ES (as amended), residual cumulative effects of minor adverse significance or greater were only identified for the demolition and construction phase for socio-economic receptors. As such, the potential for cumulative effects during this period is only assessed in relation to this topic in this ES Addendum. The potential for cumulative effects during the operational phase is considered for all topics, except for archaeology which was scoped out of the 2022 ES.
- 2.13 A qualitative assessment has been undertaken, based on available information and professional judgment. As defined by Part (18)(4)(c) of the EIA Regulations, the use of other assessments and associated environmental information already available to the Applicant and LB Haringey is deemed adequate to use in the assessment of potential significant effects of the 2022 Scheme. A review of the Lendlease ES has been undertaken by the Applicant's appointed technical specialists. As the conclusions of the Lendlease ES were accepted by LB Haringey, reliance has been placed on those conclusions within this ES Addendum.
- 2.14 The cumulative assessment provided in Chapter 17 of the Lendlease ES and its conclusions form the basis of the qualitative assessment undertaken within this ES Addendum, coordinated with a review of the residual effects identified for the 2022 Scheme in isolation. Taking into context the limited extent of the uplift in amount of floorspace and massing of the Amended Scheme relative to the Extant Consents 1 and 2 (as detailed in paragraph 1.7) inherent within the Lendlease Scheme, statements are provided on the potential cumulative effects of the Amended Scheme in-combination with the Lendlease Scheme.

Topic assessed in the 2022 ES	Implications on the 2022 ES Topic Chapter
	<ul style="list-style-type: none"> ▪ It can be concluded that the Amended Scheme has, in general, the effect of reducing windiness over the Lendlease Scheme, and that the mitigations described in the 2022 ES remain highly effective in rendering all cumulative wind effects Negligible. <p>Review of Mitigation and Monitoring Measures</p> <p>Overall, minor adverse to moderate beneficial cumulative wind effects are anticipated taking into account the Lendlease Scheme, all other cumulative schemes of relevance, and the Amended Scheme. The embedded mitigation defined by the landscaping strategy of the Lendlease Scheme and the 2022 Scheme in combination is considered capable of rendering all minor adverse cumulative wind effects negligible. No new or materially different mitigation or monitoring measures are considered necessary to address potential wind effects to those stated in the 2022 ES. The Lendlease ES states that embedded mitigation measures are needed within the north-west of the Lendlease Site. However, the Amended Scheme eliminates the need for those measures in isolation and significant residual cumulative effects are not expected in this location, as compared to the conclusions stated in the Lendlease ES regarding the extant consent.</p> <p>Based on the findings set out in this ES Addendum, there are no new or materially different mitigation or monitoring measures required to mitigate potential wind effects to those stated in the 2022 ES.</p>
Built Heritage	<p>Review of Policy Context, Legislation, Guidance and Standards</p> <p>There have been no changes to the legislation, policy, guidance and applicable standards since the 2022 ES. Section 11.2 “Legislation, Planning Policy and Guidance” of the 2022 ES remains valid.</p> <p>Review of Baseline Conditions</p> <p>There have been no material change to the baseline conditions described in the 2022 ES. The baseline conditions described in the 2022 ES remain valid.</p> <p>Review of Assessment Methodology</p> <p>The methodology for the assessment of effects as described in the 2022 ES remains valid.</p>

Review of Likely Significant Effects

The proposed changes would be very limited in terms of the presence of the Amended Scheme when seen/experienced in conjunction with the assessed heritage assets. There are no changes to the potential built heritage effects identified in the submitted 2022 ES, i.e. no likely significant effects.

Cumulative Effects of Lendlease Scheme

Demolition and Construction

Receptor	2022 ES	Lendlease ES	Commentary on cumulative assessment of Amended Scheme with Lendlease Scheme
The Grange	Minor-Negligible Adverse	Minor Beneficial	The Lendlease ES did not account for any adverse effects due to hoarding and construction activities, and only accounted for the beneficial effect of removing the terrace to the east of the building. The Amended Scheme would not introduce additional construction effects relating to this heritage asset.
Nos. 797-799 High Road	Minor-Negligible Adverse	Negligible Adverse	The Lendlease ES did not account for any adverse effects due to the construction of the taller development, hence a slightly different effect from the 2022 ES. The Amended Scheme would not introduce additional construction effects relating to this heritage asset.
Nos. 819-821 High Road	Minor-Negligible Adverse	Negligible Adverse	The Lendlease ES did not account for any adverse effects due to the construction of the taller development, hence a slightly different effect from the 2022 ES. The Amended Scheme would not introduce additional construction effects relating to this heritage asset.
Nos. 867-869 High Road	Minor-Negligible Adverse	Negligible Adverse	The Lendlease ES did not seem to account for any adverse effects due to the construction of the taller development, hence a slightly different effect from the 2022 ES. The Amended Scheme would not introduce additional construction effects relating to this heritage asset.
North Tottenham Conservation Area	Minor-Negligible	Negligible Adverse	The Lendlease ES did not seem to account for any adverse effects due to the construction of the taller development, hence a slightly different effect from the 2022 ES. The Amended Scheme would not

Topic assessed in the 2022 ES	Implications on the 2022 ES Topic Chapter		
	Negligible Adverse		introduce additional construction effects relating to this heritage asset.
Bruce Castle and All Hallows Conservation Area	-	N/A	No change
Stationmaster’s House	Negligible Adverse	Negligible Beneficial	The Lendlease ES did not account for any adverse effects due to the construction of the taller development (para 10.23 incorrectly states “There will be no change to the setting of this building in views directly looking towards it.”). The Amended Scheme would not introduce additional construction effects relating to this heritage asset.
Completed Development			
A comparison of operational phase cumulative effects presented in the 2022 ES and Lendlease ES is presented below.			
Receptor	2022 ES	Lendlease ES	Commentary on cumulative assessment of Amended Scheme with Lendlease Scheme
The Grange	Negligible	Minor to Moderate Beneficial	The Lendlease ES did not account for any adverse effects due to the taller components of the Lendlease scheme that would be seen behind the building, and only accounted for the beneficial effect of removing the terrace to the east of the building. The Amended Scheme would be taller, but considerably narrower, in the backdrop to this building and would not introduce additional effects relating to this heritage asset.
Nos. 797-799 High Road	Negligible	Minor Adverse	The Lendlease ES assessment accounted for development immediately behind the building, and the wide parameter blocks of the more distant taller elements. The Amended Scheme would not introduce additional effects relating to this heritage asset.

Topic assessed in the 2022 ES	Implications on the 2022 ES Topic Chapter			
Nos. 819-821 High Road	Minor-Negligible	Minor to Moderate Adverse	The Lendlease ES assessment accounted for “ <i>development forming a new backdrop to the listed buildings to the north, west and south</i> ” (para 9.70) which are not associated with the Amended Scheme. The Development would not introduce additional effects relating to this heritage asset.	
Nos. 867-869 High Road	Minor-Negligible	Medium Adverse	The Lendlease ES assessment took into account that “the parameters are considerably taller than the three storey listed buildings. The parameters will form a largely solid backdrop behind the buildings and will introduce a new element into their setting” (para 9.104). The Amended Scheme is detailed proposal that includes fully resolved and well-articulated buildings of compatible materials and with their scale broken down considerably when compared with the LL Scheme parameters. This accounts for the differences in the assessments. The Amended Scheme would not introduce additional effects relating to this heritage asset.	
North Tottenham Conservation Area	Negligible	Minor to Moderate Adverse	The Lendlease ES assessment accounted for development “immediately to the north of the CA across Brereton Road [... which] will introduce very tall new elements into the setting of the CA. The rest of the Proposed Development will also be seen in views looking north.” (para 9.93). The Amended Scheme would not introduce these elements, and would cause no additional effects relating to this heritage asset.	
Bruce Castle and All Hallows Conservation Area	-	N/A	No change	
Stationmaster’s House	Negligible	Minor Adverse	The Lendlease ES assessment accounted for “ <i>a solid backdrop immediately behind the building and [...] a new element into its setting</i> ” (para 9.81). The Amended Scheme would be taller, but	

Topic assessed in the 2022 ES	Implications on the 2022 ES Topic Chapter
	<p data-bbox="1137 264 2029 411">considerably narrower, in the backdrop to this building and would be well-articulated with the scale broken down considerably when compared with the Lendlease Scheme. The Amended Scheme would not introduce additional effects relating to this heritage asset.</p> <p data-bbox="443 466 2029 571">It is not anticipated that the Amended Scheme would lead to a material change on the significance of cumulative effects stated in the Lendlease ES. Accordingly, negligible to moderate adverse cumulative effects are anticipated on built heritage assets from the Lendlease Scheme and the Amended Scheme with other cumulative schemes.</p> <p data-bbox="443 609 1088 635">Review of Mitigation and Monitoring Measures</p> <p data-bbox="443 673 2029 896">Based on the findings set out in this ES Addendum, there are no new or materially different mitigation or monitoring measures required to mitigate potential built heritage effects to those stated in the 2022 ES, taking into account the potential cumulative effects of the Lendlease Scheme. As set out in Section 8 of Volume 3: Heritage, Townscape and Visual Impact Assessment (HTVIA) of the Lendlease ES, mitigation principles have been integrated into the application’s Design Code pertaining to the outline areas of the permission to ensure that future Reserved Matters Applications (RMAs) providing sufficient information and design mitigation to mitigate adverse cumulative effects on built heritage assets.</p>
<p data-bbox="197 1082 405 1152">Townscape and Visual Impacts</p>	<p data-bbox="443 957 1326 983">Review of Policy Context, Legislation, Guidance and Standards</p> <p data-bbox="443 1021 2029 1126">Since the 2022 ES, Historic England’s Advice Note 4: Tall Buildings has been revised (2022 edition). However, this update has no material implications on the TVIA. There have been no other changes to policy, legislation and guidance since the 2022 ES.</p> <p data-bbox="443 1165 869 1190">Review of Baseline Conditions</p> <p data-bbox="443 1228 1599 1254">The baseline conditions described in the February 2022 ES Volume II: TVIA remain valid.</p>