

Park Plaza North Screening for Environmantal Impact Assessment

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Prepared on behalf of

IKEA LTD April 2019

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1. Introduction

This Screening / Scoping Report is submitted by Cushman and Wakefield on Behalf of IKEA Ltd in respect of its land holdings at Park Plaza North, Waltham Cross, in the Borough of Broxbourne.

The purpose of this Report is to screen proposed development on behalf of IKEA in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017 ('EIA Regulations').

In order to determine if it is necessary to undertake an EIA to accompany a planning application, Part 2 Regulations 5 & 6 of the EIA Regulations make provision for an applicant to apply to a LPA for a 'Screening Opinion' and under Part 4 Regulation 15 for a 'Scoping Opinion'.

This screening / scoping Report outlines the basis on which it is considered an EIA is not required and requests the Council's screening of the need for an EIA, having regard to technical environmental work already undertaken, the nature of the proposals and the suggested list of supporting documentation which is to be agreed with the Council for the formal planning application submission.

If the Council conclude that an EIA is required under the EIA Regulations, then this Report formally requests the scoping of the EIA document, having regard to the proposed list of documents which it is anticipated, will be submitted alongside the outline planning application.

In particular, the applicant seeks to understand the following from the Borough of Broxbourne Council (BoB):

a) The environmental issues/topics identified within this Report are appropriate to the assessment;

b) Whether there are any other additional environmental issues that should be given due consideration; and

c) What additional developments in the locality – if any – need to be assessed in conjunction with this Proposed Development as part of an assessment of cumulative effects.

To this end, in accordance with the Regulations, this Report contains:

- i. A plan sufficient to identify the land for the purposes of EIA Screening / Scoping (Figure 1, Appendix 1);
- ii. A brief description of the nature and purpose of the development, including its location and technical capacity;
- iii. An explanation of the likely significant effects of the development on the environment; and
- iv. Such other information or representations as the person making the request may wish to provide or make.

If required, the EIA process will be presented by means of an Environmental Statement (ES) that will be prepared and submitted alongside the planning application. This will include such information referred to in Part 1 of Schedule 4 of the Regulations as is reasonably required to assess the environmental effects of the Proposed Development, scoped with BoB. The ES will contain, amongst other things, a Non-Technical Summary (NTS).

2. The Site

The Park Plaza North site is formed of a large area of brownfield land which has been redeveloped in part with the remainder of the site historically lying vacant and cleared. The planning application proposes the development of this latter remaining part.

Overall, the IKEA site area is calculated at approximately 9.9 ha (24.7 acres). As is usual, the screen/scope boundary is pushed slightly outside this area and encompasses an area of just over 10 ha (25 acres).

A redline site boundary of the land is provided at Figure 1 (Appendix 1) for the purposes of this screen/scope letter. It should be noted that the redline boundary may be subject to some changes as the planning application is prepared.

The entirety of the site falls within the administrative control of the Borough of Broxbourne Council.

The site is generally defined by:

- To the north by the A121 Winston Churchill Way;
- To the south by the News International complex which comprises a major print-works and logistics centre (this area is known as 'Park Plaza South')
- To the east by a railway line which comprises part of the Southbury Loop section of the Lea Valley Line; and
- To the west by the A10 and land under use by Travelodge.

The site presently has a single point of access to the south west, with a roundabout connecting both Park Plaza North, including Travelodge with Park Plaza South. This leads to a traffic light controlled road junction which accesses both north and south carriages of the A10.

3. Proposals

IKEA, as the owners of land at Park Plaza North, propose to bring forward a mixed-use development comprising mixed employment and retail uses; focussed on the development of a new concept 'Fulfilment Centre' for IKEA.

The planning application will be submitted in outline, with all matters reserved for subsequent approval, with the exception of means of access.

A description of development is likely to adopt the following approach:

'Outline planning application for IKEA fulfilment centre under Use Class B1/B2/B8 use, with trade park B1/B2/B8 uses or bulky good retail to include the relocation of uses from Waltham Cross, with ancillary A3 accommodation, parking, servicing, access and landscaping'

As part of the outline planning application, maximum parameters will be provided. It is anticipated this will include, as a minimum, a series of maximum floor space figures across the proposed Use Classes so that these can be tested in technical documents. Maximum heights of the buildings, notably the IKEA unit, will also be defined in both parameter and illustrative form, so that these can be tested against visual and amenity impact.

These Maximum floor space parameters are likely to be

- IKEA Fulfilment Centre: 37,161 sqm / 400,000 sqft B8 (incorporating B1 and customer click and collect uses also)
- Bulky Good Retail (including potential relocations) of 13,935 sqm / 150,000 sqft with 1,858 sqm / 20,000 sqft ancillary offices OR an equivalent floorspace of B1/B2/B8 use (proposals will be tested for either scenario)
- Trade Park / Mixed B1/B2/B8 Use: 3,716sqm / 40,000sqft
- Supportive A3 uses: 929sqm / 10,000sqft

The maximum height of the development, for the purposes of the parameters, will be the IKEA unit, which will be no greater than 35m.

The IKEA Fulfilment Centre is a new concept, which will provide a hub for IKEA's distribution to addresses, in fulfilment of on-line purchases and which will also allow 'click and collect' of goods by the general public. The centre will also have an administrative office function, and possibly a small café and ancillary display functions. A significant portion of the proposals we consider fall under a B8 (Warehousing and Distribution) use class. It is estimated that the proposed Fulfilment Centre will generate approximately 460 jobs.

IKEA and its advisors are also working alongside BoB to bring forward relocations of businesses from other locations to PPN. This will help BoB fulfil its ambitions for wider regeneration in the borough, notably, at Waltham Cross, with the potential relocation of Fishpools and possibly Wickes. Discussions in respect of both retailers are ongoing and relocation will take place subject to the conclusion of satisfactory commercial negotiations.

4. Development Plan Support

The Broxbourne Local Plan Second Review was adopted in 2005.

The Plan sets out policy for how planning applications will be assessed and the spatial strategy for the borough between 2001 and 2011 with the following employment / economy policies being saved.

- EMP 1: 'Employment Areas' notes the Council will permit development or changing the use of B class land if it is changed from another B use class.
- EMP 5: 'Employment Uses in Town Centres' says that the Council will permit B1a and B1b use development in the allocated town centres on the Proposals Map.
- EMP 6: 'Local Employment Sites' says that alternative development of local employment sites will only be allowed if the developer can fulfil certain criteria and illustrate that there is no demand for a site.
- EMP 7: 'Incompatible Employment Uses ('Bad Neighbour Uses')' outlines that developments will be encouraged to mitigate the impact of incompatible development use. Development which intensifies an incompatible use will be discouraged unless mitigation is possible.
- EMP 9: 'Small Business Units' says that development of small business units of less than 235m2 gross will be permitted within employment areas and town centres. 2.4.5 Policies specific to employment sites in Broxbourne include: •

Policy designation EMP 2¹: 'Park Plaza Employment Site' outlines 'the Park Plaza employment site is allocated for a comprehensive high-quality business development (B1a and B1b) to accommodate'

- Companies in the high technology sector and/or;
- Companies or activities in the regional or national interest.

The Broxbourne Core Strategy was submitted by the Council in December 2010 for review by an independent Inspector. The Inspector indicated that he could not find the Core Strategy sound as submitted, in particular because of the quantum of retail and leisure floor space within the proposed Brookfield development. The Council decided to develop a new Local Plan as a consequence.

The News International print works building which dominates the site is flanked to the north and south by vacant sites, measuring 9.9ha and 0.9ha hectares respectively. The southern site has a historic extant planning permission for office use which has not been implemented.

A planning brief was prepared for the whole Park Plaza site in 1995. This proposed '*specialised technological activities or other activities in the national or regional interest*'. A further draft consultative brief for Park Plaza North was published in August 2009.

A Development Brief for PPN was then published in 2010 which superseded both previous briefs. This outlined a Council vision of the site for:

'a mix of business, high technology industries, research and development - supported by uses such as an hotel and other users appropriate to a key, high technology employment site'

The Council subsequently indicated a change in its stance since this document in the emerging Borough of Broxbourne Plan, with site specific PP2 allocation citing acceptable development

¹ 'Park Plaza' refers to the 'Park Plaza North' as termed in the 2016 Local Plan Vision, Objectives, Growth Targets and Key Allocations, and not Park Plaza West or TwentyFive25

comprising B1/B2 or businesses² requiring relocation from elsewhere in BoB as a consequence of other Council regeneration initiatives. This Policy also required a Landmark development at the north west corner of the site at the A10 / Winston Churchill Way junction.

The policy notes that the site will be developed in general accordance with a master plan and design code which will be incorporated within an outline planning application for the development.

Proposed amendments following representations to the Plan are suggested by BoB as:

Policy PP2: Park Plaza North

Park Plaza North is allocated for a variety of small and medium sized enterprises mix of employment uses as follows:

 Bulky goods retailers that need to be relocated Restricted to use classes B1, B2 or businesses requiring to relocate as a result of regeneration developments proposed within this Local Plan Waltham Cross Town Centre; and
 Landmark development at the corner of the A10 and Winston Churchill Way.
 A mix of B1, B2 and B8 uses on the remainder of the site-

The site will be developed in general accordance with a master plan and design code which will be incorporated within an outline planning application for the development. The masterplan should include a visual landmark development at the corner of the A10 and Winston Churchill Way.



The Policy is supported by an illustrative plan (above) which covers both PPN and Park Plaza West and shows potential for access into the site. An earlier iteration of this showed a dual access to PPN, including both from the A10 and Winston Churchill Way.

It is therefore clear that:

- The site historically has been considered appropriate for comprehensive development;
- Such development was anticipated as having a high level of vehicular access according to historic mixes
- The outline proposals being advanced largely accord with the emerging plan led approach for a mix of uses to include B8 Warehousing.
- The general tenet of accessibility from both the A10 and Winston Churchill Way was deemed acceptable.

² The policy does not define the use of such businesses but C&W/IKEA area working alongside the Council for the relocation of a number of retail warehouses from Waltham Cross to realise regeneration ambitions for the town centre

5. Approach to Screening For Environmental Impact Assessment

The Environmental Impact Assessment process seeks to ensure that the likely significant effects of a new development are fully identified and taken into account and, where necessary, mitigated before that development is allowed to proceed.

Information below outlines the work which has previously been undertaken in pre-purchase of the site and that which is proposed as part of the planning application process, in order to help the Borough of Broxbourne Council reach a determination on the requirement for an EIA, or otherwise, to assist in the scoping of the EIA.

The proposed development exceeds the identified thresholds for Schedule 2 developments in that:

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

Moreover, Category 10(a) of Schedule 2 of the EIA Regulations defines 'Industrial estate development projects' whilst Category 10(b) is applicable to more widely 'Urban development projects'.

Category (10(b)) is however broadly defined and includes:

'... The construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas' but is also commonly applied to other mixed use, including mixed commercial and retail developments in both rural and urban settings.

However, Schedule 2 developments are only 'EIA development' where they have the potential to give rise to likely significant effects on the environment by factors such as their nature, size and location.

The Ministry of Housing, Communities & Local Government's (MHCLG) Planning Practice Guidance note 1 states that the purpose of EIA is:

'to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process.'

To this end, the development has benefitted from historic and long running ambition for over two decades from BoB to be developed for commercial and industrial uses. This continues in the Council's proposed policies in the emerging Broxbourne Plan.

Where an EIA is deemed required, the Government Practice Guidance is clear that it should focus on the principal issues, such:

'Whilst every Environmental Statement should provide a full factual description of the development, the emphasis should be on the 'main' or 'significant' environmental effects to which a development is likely to give rise. The Environmental Statement should be proportionate and not be any longer than is necessary to assess properly those effects.'

Continuing:

'Where, for example, only one environmental factor is likely to be significantly affected, the assessment should focus on that issue only. Impacts which have little or no significance for the particular development in question will need only very brief treatment to indicate that their possible relevance has been considered.'

Preliminary Environmental Work Undertaken

As part of the purchase of the site, a number of relevant investigations were produced, including:

- Ground investigation works
- Ecology Survey
- Breeding Bird Survey

These are attached in Appendices 2-4

The conclusions of these documents, in combination are:

- The site was dominated by un-mown semi-improved neutral grassland, with scrub, scattered trees, woodland, ruderal vegetation, hedgerows and a pond.
- Great crested newts were not recorded as present on site. No further action is considered necessary with respect to this species.
- No evidence of dormice was recorded on site. Dormice are therefore not considered to be a constraint to the re-development of the site.
- No evidence of badgers was recorded on site during the current surveys. No further action is considered necessary in respect of badgers.
- A low population of common lizards were recorded on site, with a peak count of 6 adults present on any one survey. Recommendations are made to avoid harming reptiles during vegetation clearance.
- No species of birds recorded during surveys are included on Annex 1 of the EU Birds Directive or on Schedule 1 of the Wildlife and Countryside Act.
- No species considered as breeding or probably / possibly breeding were present in any significant numbers, approaching 1% of the UK population.
- It was recommended that the development retains existing boundary scrub and trees, to provide food and nesting opportunities for birds.
- Low levels of bat activity were recorded on site. Recommendations are made to minimise any artificial lighting, and to enhance the habitat along the site boundaries, to ensure bats can continue foraging and commuting across the site following the redevelopment.
- Recommendations with respect to the enhancement of biodiversity on site were also included.

Planning Application Documents to be submitted

Notwithstanding the above documents have already been undertaken, the planning application will be supported by the following documents:

Illustrative Plans, Parameter Plans and CGI's

The Planning application will be supported by illustrative masterplans, parameter plans and a number of CGI's illustrating how the development may be viewed from key vistas.

This will illustrate and consider the effects arising from;

- The amount of floor space proposed as part of the development
- Potential relationships with sensitive receptors, such as residential and orientation of buildings; and
- 'Plan led' objectives, such as the desire to have a significant building on the corner of the A10/A121 Winston Churchill Way gyratory.

Landscape & Visual

A Landscape and Visual Impact Assessment will assess the effect of the Proposed Development on landscape and visual receptors. This would be prepared in accordance with the Guidelines for Landscape & Visual Impact Assessment, GLVIA3 (2013).

The possible effects arising from the Proposed Development are considered to be in relation to:

- The impact on landscape character and landscape receptors;
- Impact on views that are experienced by visual receptors (including residential amenity).

Ecology / Biodiversity

Preliminary ecological surveys have already been undertaken. This concludes there is limited ecological value across the site and nothing which prevents the development of the land.

This work will be updated as part of the application and will consider the possible effects arising from the Proposed Development are considered to be in relation to:

- Disruption and/or loss of ecological habitats;
- Pressure or increased pressure on surrounding ecological resources.

Water and Drainage

A Flood Risk Assessment (FRA) and Sustainable Drainage Assessment (including SUDS) will be prepared and will consider potential flooding sources, i.e. rivers, surface water, ground water and artificial sources, together with a Sustainable Drainage Statement for the Proposed Development.

Possible effects arising from the Proposed Development are considered to be in relation to:

- Changes in the patterns of hydrology;
- The need for any attenuation;
- Increased discharge and pollution to watercourses; and
- Additional demand upon water resources.

Ground Conditions

A Phase 1 Ground Conditions assessment will address the geological and hydrogeological setting of the wider site and individual component parts, past uses, with particular focus directed towards the proposed use. This will develop that work already undertaken on ground conditions / contamination.

The principal objective of this technical assessment will be to identify the risks associated with soil and groundwater contamination, and how remediation (if required) will remove risks to allow the development proposals to proceed in a manner that ensures risks to occupants, buildings and landscaped areas would be minimised to an acceptable level.

The possible effects arising from the Proposed Development are considered to be in relation to:

- Impacts on the contamination of potential groundwater contamination; and
- The likelihood of a pollutant source-pathway-receptor linkage being present

Transport & Accessibility

The planning application will be supported by a Transport Assessment (TA) which will both consider the baseline transport conditions on the local highway network for traffic, pedestrians and cyclists, and any changes in the position which has been previously assumed by Hertfordshire County Council, who we understand has already modelled this site for a mixed use development.

The TA will also consider the accessibility and availability of public transport.

This will allow an assessment of the potential effects of the proposed development on the operation of the local highway network, pedestrian facilities and amenity, conditions for cyclists and the capacity of public transport services.

For any potential significant impacts, the TA will consider possible mitigation measures including a Travel Plan, which will set out the proposed strategy to encourage sustainable patterns of travel.

The TA will be undertaken using a combination of desktop assessments, site observations during the weekday peak hours and surveys where required and utilisation of Hertfordshire Country Council data.

The possible effects arising from the Proposed Development are considered to be in relation to:

- Impact of increased vehicular movements on the flow of the highway network/possible congestion;
- Impact of increased vehicular movements on the capacity of junctions;
- Impacts on highway safety.

The TA will also advise and inform the Air Quality assessment (below).

Air Quality

An assessment of existing air quality in the vicinity of the development site will be undertaken to establish baseline conditions and potential impact on identified Air Quality Management Areas (AQMA).

The air quality technical assessment will incorporate the following:

i) A review and summary of existing local, regional, national and international policies and guidelines regarding the protection of air quality;

ii) A description of the baseline air quality conditions at and around the site;

iii) Identification and description of sensitive receptors in or surrounding the site with the potential to be affected by the development proposals;

iv) Prediction and assessment of the impact on air quality from operational traffic generation;

v) Prediction of concentrations of key pollutants at sensitive receptors within and surrounding the site and comparison with the air quality objectives set out in the Air Quality Standards Regulations; and

vi) Where necessary, mitigation measures will be recommended to reduce air quality impacts and the potential exposure on future occupants.

The possible effects arising from the proposed development are considered to be in relation to:

- Impact of increased vehicular movements on sensitive receptors; and
- Impacts of construction and operations activities on sensitive receptors.

Noise

A Noise Impact Assessment will be prepared which will measure baseline noise conditions around the site and will assess the potential impact of construction and operational activity noise and the impact of any additional traffic noise generated on the local highway network as a result of the completed development. As part of this, sensitive receptors will be identified, alongside baseline sources, including the railway, the A10 and the A121 Winston Churchill Way.

The possible effects arising from the Proposed Development are considered to be in relation to:

- Impact of increased vehicular movements;
- Impacts of construction; and
- Operational activities.

Utilities Infrastructure Assessment

A Foul Water and Utilities Assessment will be prepared to identify the existing services infrastructure within/surrounding the site.

The Assessment Report will evaluate any potential impacts on the existing services networks resulting from the proposed development and to obtain intermediate level information regarding the requirement for any diversionary works.

The possible effects arising from the Proposed Development are considered to be in relation to:

- Capacity of existing infrastructure to accommodate the proposed development;
- The ability of existing infrastructure to be increased/diverted; and
- Any mitigation required on site / off site.

Lighting Impact Assessment

Although the planning application is proposed in outline only, a Lighting Impact Assessment will be prepared to consider any sensitive receptors, the baseline conditions and effects of artificial lighting resultant from the proposed development.

The possible effects arising from the Proposed Development are considered to be in relation to:

- Type of lighting installations during construction and post construction;
- The duration of the lighting anticipated; and
- The impact of lighting on any identified sensitive receptors.

Renewable Energy Statement

The planning application will be supported by a renewable energy statement which will consider the contribution the development can make to the principal of sustainable energy,

The possible effects arising from the proposed development are considered in relation to:

- The potential effect of the proposals on energy demand in the area; and
- The contribution which the development can make through sustainable and renewable energy.

Socio Economic / Retail Impact

A Socio-Economic / Retail Impact Assessment can be produced, subject to further clarification with the Council. This information can assess any impact from the development on the surrounding population alongside and retail impact arising from the proposed bulky good retail floor space.

The possible effects arising from the Proposed Development are considered to be in relation to:

- The impact on the local economy and labour market (during the construction and operational phases); and
- The impact on the local and wider retail sector.

Heritage Impact

Whilst the visual and landscape assessment/appraisal will consider the potential effect of views of the site, taking account the maximum parameters, a specific Heritage Assessment can be produced if the Council wish to judge the effect of the development on Cedars Park, to the north of the site.

The possible effects arising from the Proposed Development are considered to be in relation to:

- The impact on landscape character of Cedars Park as a receptor; and
- Impact on views that are experienced by other visual receptors which may have a historic significance, be these either buildings or landscapes.

Planning Statement

The Planning Statement will provide a non-technical summary of the conclusions of the key documents alongside an assessment of the policy and development plan framework for the site.

Planning Application Submitted Documents: Combined Effect

In combination, these documents will outline:

- A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution of baseline without implementation of the development.
- A description of any element likely to be significantly affected: population, human health, biodiversity, land and landscape
- A description of the likely effects of the development on the environment from, inter alia:
 - a) the construction and proposed development;
 - b) its use of natural resources, in particular land, soil, water and biodiversity;
 - c) the emission of pollutants, noise, vibration, light, heat and radiation,
 - d) the risks to human health, amenity, cultural, heritage or environment;
 - e) the cumulative effects with other existing and/or approved projects,
 - f) the impact of the project on climate (eg the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change; and
 g) technologies and the substances used.
- A description of the forecasting methods or evidence used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved;
- A description of the expected significant adverse effects of the development on the environment deriving from the proposals;
- A description of the measures envisaged to avoid, prevent, reduce or, if possible, mitigate and offset any identified significant adverse effects on the environment; and
- where appropriate, any proposed monitoring arrangements for construction and operational phases.

Alongside that work already undertaken, in combination, we consider the documents above mitigate the need for an EIA. However if the Council disagree, we would be grateful for its full scoping, having regard to those proposed documents set out above.

6. Conclusion

This Screening / Scoping Report is submitted by Cushman and Wakefield on Behalf of IKEA Ltd in respect of its land holdings at Park Plaza North, Waltham Cross, in the Borough of Broxbourne.

The purpose of this Report is to screen proposed development on behalf of IKEA in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017 ('EIA Regulations').

In order to determine if it is necessary to undertake an EIA to accompany a planning application, Part 2 Regulations 5 & 6 of the EIA Regulations make provision for an applicant to apply to a LPA for a 'Screening Opinion' and under Part 4 Regulation 15 for a 'Scoping Opinion'.

To this end, in accordance with the Regulations, this Report contains:

- v. A plan sufficient to identify the land (Figure 1, Appendix 1);
- vi. A brief description of the nature and purpose of the development, including its location and technical capacity;
- vii. An explanation of the likely significant effects of the development on the environment; and
- viii. Such other information or representations as the person making the request may wish to provide or make.

Work has already been undertaken on key receptor-aspects of the site, notably relating to ecology and contamination. The Planning Application will be further supported by a significant body of technical assessment relating to a wide diversity of potential impacts including, inter alia, transport, air quality, ecology, visual, noise and retail assessments.

Having regard to the above, we would be grateful for the Councils formal screening of the proposals. If the determination is that an environmental impact assessment is required, then we would welcome confirmation of the further scope of any documents required to support the planning application in addition to those outlined in this Report.

We look forward to the Council's response and in the meantime if there are any queries or points of clarification, then please do not hesitate to contact Ian Anderson via ian.anderson@cushwake.com / 020 3296 2283.

Cushman and Wakefield April 2019



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