

From: Planning Support
Subject: FW: Planning Application HGY/2023/0728 at 341A Seven Sisters Road, Tottenham, London, N15 6RD

Dear Phillip,

Re: Planning Application HGY/2023/0728 at 341A Seven Sisters Road, Tottenham, London, N15 6RD

Thanks for contacting the Carbon Management Team (Pollution) regarding the above planning application for the Construction of two new buildings to provide new warehouse living accommodation (Sui Generis (warehouse living)), ground floor café/ workspace (Use Class E) and associated waste collection and cycle parking. Erection of 10 stacked shipping containers (two storeys) to provide workspace/ artist studios (Use Class E), toilet facilities and associated waste collection and cycle parking. Landscape and public realm enhancements including the widening of and works to an existing alleyway that connects Seven Sisters and Tewkesbury Road, works to Tewkesbury Road, the creation of rain gardens, greening, seating, signage and artworks and all other associated infrastructure works, including the removal of an existing and the provision of a new substation to service the new development at 341A Seven Sisters Road, Tottenham, London, N15 6RD and I would like to comment as follows.

Having considered all the relevant applicant submitted information including Design and Access Statement, Phase 1 Desktop Study with reference 24822-A2SI-XX-XX-RP-Y-0001-01 prepared by A2 Site Investigation Ltd, dated 21 October 2022 taking note of Sections 4 (Site History), 5 (Environmental Setting), 7 (Conceptual Site Model and Preliminary Risk Assessment), 8 (Closing Remarks), Energy Statement prepared by Expedition Engineering, dated 14th December 2022 taking note of section 4 (Methodology), 5 (Energy strategy) and 6 (Conclusion) as well as Air Quality Assessment prepared by Air Quality Solutions Ltd and taken note of Section 3 (Methodology), 4 (Baseline), 5 (Assessment) and 6 (Conclusion), **please be advised that we have no objection to the proposed development in relation to AQ and Land Contamination but the following planning conditions and informative are recommend should planning permission be granted.**

1. Land Contamination

Before development commences other than for investigative work:

- a. Using the information already submitted in Geo-Environmental Site Investigation Report with reference B2538/22/GEO/1 prepared by Earth Environmental & Geotechnical (Southern) Ltd dated 22nd December 2022, an intrusive site investigation shall be conducted for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.
- b. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.
- c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and;
- d. A report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

2. Unexpected Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to

and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

3. Updated Air Quality Assessment

Whilst the submitted Air Quality Assessment report prepared by Air Quality Solutions Ltd, dated 22nd February is noted, considering the distance of the proposed development to the monitoring sites used as baselines we do not consider this to be fully representative of the development site which is beside a major road (Seven Sisters Rd). and the likely operational effect of the road on the proposed development occupiers, an updated AQ assessment will need to be conducted so as to determine the actual existing baseline concentration in order to know the level of mitigation that will be required for the various floors of the development. We also take note of the use of air source heat pumps and photovoltaic panels as energy source as well as the trackout medium dust risk.

Therefore, in order to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people),

- Applicant will need to provide us an addendum AQ assessment of the proposed development taken into consideration the likely operational impact on the development by its proximity to a major busy road, so as to be able to reach an informed decision on its significant effects on the proposed development site and the overall local air quality.
- Actual baseline monitoring will need to be undertaken at or within the close proximity of the site itself rather than relying purely on baseline monitoring farther away from the site or Defra mapped background concentrations.
- Applicant will need to revise predicted NO₂ Concentrations following such assessment.

Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.

4. NRMM

- a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NO_x and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <http://nrmm.london/>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.
- b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.

Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ

5. Demolition/Construction Environmental Management Plans

- a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst
- b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.

The following applies to both Parts a and b above:

- a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).
- b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:
- i. A construction method statement which identifies the stages and details how works will be undertaken;
 - ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;
 - iii. Details of plant and machinery to be used during demolition/construction works;
 - iv. Details of an Unexploded Ordnance Survey;
 - v. Details of the waste management strategy;
 - vi. Details of community engagement arrangements;
 - vii. Details of any acoustic hoarding;
 - viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);
 - ix. Details of external lighting; and,
 - x. Details of any other standard environmental management and control measures to be implemented.
- c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:
- i. Monitoring and joint working arrangements, where appropriate;
 - ii. Site access and car parking arrangements;
 - iii. Delivery booking systems;
 - iv. Agreed routes to/from the Plot;
 - v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and
 - vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and
 - vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.
- d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:
- i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;
 - ii. Details confirming the Plot has been registered at <http://nrmm.london>;
 - iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;
 - iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);
 - v. A Dust Risk Assessment for the works; and
 - vi. Lorry Parking, in joint arrangement where appropriate.

The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.

Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality."

Informative:

1. Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.

I hope the above clarifies our position on the submitted application? Otherwise, feel free to contact us should you have any further query in respect of the application quoting reference number WK/565882.

Kind Regards,

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Pollution Officer

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