

James Argles

From: Planning Support
Subject: FW: Planning Application HGY/2023/0570 at Omega Works, Hermitage Road, Tottenham, London, N4 1LZ

Sent: 04 May 2023 15:21

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Dear Phillip,

Re: Planning Application HGY/2023/0570 at Omega Works, Hermitage Road, Tottenham, London, N4 1LZ

Thanks for contacting the Carbon Management Team (Pollution) regarding the above planning application for the Redevelopment of the site for a mixed-use scheme comprising employment use (use Class E), 8 warehouse living units (sui-generis use class), and 76 residential units (use Class C3). Together with associated landscaping, cycle storage, accessible car parking spaces, children's play space, and waste & refuse areas (Omega Works A) at Omega Works, Hermitage Road, Tottenham, London, N4 1LZ and I would like to comment as follows.

Having considered all the relevant applicant submitted information including: Design and Access Statement; Contaminated Assessment Report with reference GWPR4712/CAR/August2022 prepared by Ground and Water Ltd, dated August 2022 taking note of Sections 3 (Site Works), 5 (Contamination Risk Assessment) and 6 (Contamination Recommendations and Remediation Strategy), Energy Statement with reference 626-11.2-Energy Statement prepared by Consolux Sustainability Ltd, dated 21st October 2022 taking note of the proposed use of Air source Heat Pump and Photovoltaics (PV) panels, Framework Construction Logistics Plan with reference CLP01 prepared by Markides Associates Ltd, dated 12th August 2021 as well as an Air Quality Assessment with reference 11057A(AQ)Rev0 prepared by Phlorum Ltd, dated 26th October 2022, and taken note of sections 3 (Assessment Methodology), 4 (Baseline Assessment), 5 (Construction Phase Impacts), 6 (Operational Phase), 7 (Air quality Neutral Assessment) and 9 (Conclusions), **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 Contaminated Assessment Report with reference GWPR4712/CAR/August2022 prepared by Ground and Water Ltd, dated August 2022, remediation of contamination on the site is required, completion of the remediation detailed in the Remediation Strategy outlined in the submitted Contaminated Assessment Report shall be carried out and;
- b. 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 with reference 11057A(AQ)Rev0 prepared by Phlorum Ltd, dated 26th October 2022 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 major road(s) (Hermitage Road/A105 Green Lanes) and the likely operational effect of the roads 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.

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 busy roads, 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 the respect of the application quoting reference number WK/566272.

Kind Regards,

Edward Ritchie
Pollution Officer

Haringey Council

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