

Philip Elliott
London Borough of Haringey
Development Control
639 High Road
London
N17 8BD

Our ref: NE/2023/135667/01-L01
Your ref: HGY/2022/4310
Date: 5 May 2023

Dear Philip

Omega Works, Hermitage Road, Tottenham, London, N4 1LZ

Redevelopment of the site for a mixed-use scheme comprising employment use (use class e) and 36 residential units (use class c3). Together with associated landscaping, new courtyard, children's play space, cycle storage, new shared access route, 2x accessible car parking spaces and waste and refuse areas.

Thank you for consulting us on this application. We have reviewed the information submitted and we **object** to the planning application, as submitted, because the risks to groundwater from the development are unacceptable.

The applicant has not supplied adequate information to demonstrate that the risks posed to groundwater can be satisfactorily managed. We recommend that planning permission should be refused on this basis in line with paragraph 109 of the National Planning Policy Framework.

Reasons

Our approach to groundwater protection is set out in "The Environment Agency's approach to groundwater protection" (Feb 2018 V1.2). In implementing the position statements in this guidance we will oppose development proposals that may pollute groundwater especially where the risks of pollution is high and the groundwater asset is of high value. In this case position statement A4- *Supply of adequate information* applies.

Groundwater is particularly sensitive in this location because the proposed development site is within Source Protection Zone 1 for the Eade Road and Eade Road West potable abstractions.

To ensure development is sustainable, applicants must provide adequate information to demonstrate that the risks posed by development to groundwater can be satisfactorily managed. In this instance the applicant has failed to provide this information and we consider that the proposed development may pose an unacceptable risk of causing a detrimental impact to groundwater quality because a preliminary risk assessment (PRA) has not been provided. This document forms the basis of the conceptual site model, identifying key uncertainties and the works required to address them. Without this information it is not possible to agree the site has been subject to sufficient investigation and assessment

In addition, the Thames River basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies. Without sufficient information to demonstrate otherwise, this proposal could cause pollution of groundwater.

Overcoming our objection

the applicant needs to provide us with a preliminary risk assessment that demonstrates that the risks to groundwater posed by this development can be satisfactorily managed. We need details on site history and nature of works that occurred, locations of any tanks etc. The applicant has identified the site as being in a source protection zone one, but it is not clear if piling is required, and if so how deep these are likely to be.

In accordance with our Groundwater Protection: Principles and Practice we will maintain our objection until we receive a satisfactory preliminary risk assessment

Advice to applicant

We strongly encourage applicants to seek our pre-application advice to ensure environmental opportunities are maximised and to avoid any formal objections from us. If the applicant had come to us we could have worked with them to resolve these issues prior to submitting their planning application. The applicant is welcome to seek our advice now to help them overcome our objection via HNL.SustainablePlaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at; <https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions>

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

If you are minded to approve the application contrary to our objection, I would be grateful if you could re-notify us to explain why, and to give us the opportunity to make further representations.

Should you have any queries regarding this response, please contact me.

Yours sincerely

Mr Kai Mitchell
Sustainable Places Planning Specialist

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E-mail HNL.SustainablePlaces@environment-agency.gov.uk