

Our ref: Q220730
Your ref: PP-12388113
Email: matt.eyre@quod.com
Date: 15 August 2023



London Borough of Haringey
Planning, Regeneration & Economy
Level 6
River Park House
Wood Green
N22 8HQ

Dear Madam/Sir,

APPLICATION FOR THE APPROVAL OF DETAILS PURSUANT TO CONDITION B24 (IN FULL) OF PLANNING PERMISSION HGY/2018/223

PLOT B (FERRY ISLAND), TOTTENHAM HALE CENTRE, N17

On behalf of Midgard, please find enclosed an application for the approval of details pursuant to Condition B24 of the Tottenham Hale Centre planning permission (LPA ref: HGY/2018/2223) dated 27 March 2019. The full wording of the condition is set out in **Annex 1**.

The enclosed details comprise the importation criteria for materials to be brought onto the Site, as requested by the Environment Agency (EA) to discharge Condition B24 in full following a consultation response dated 30 January 2023 on a previous application for Conditions B19 and B24 (ref: HGY/2022/0779). This correspondence is attached as **Annex 2**.

Condition B24 has been partially discharged with Condition B19 to allow demolition, site clearance and further site investigation to be undertaken on Plot B in November 2019 (ref: HGY/2019/2523 and HGY/2019/2524).

A further application was submitted in March 2023 to fully discharge Conditions B19, B24 F10 and F15 (ref: HGY/2022/0779). However, following a series of responses and meetings, the EA confirmed that Condition B19 can be discharged in full and stating that *"A full discharge will be possible once importation criteria have been agreed, however it is noted that these are not relevant to the current stage of works."*

The enclosed information has previously been provided to the LPA and EA through correspondence on the previous application for Conditions B19 and B24 (ref: HGY/2022/0779) to initially seek to fully discharge Condition B24. However, due to the on-going correspondence with the EA on the





importation criteria, it was agreed with the LPA to part discharge the requirements of Condition B24 to allow works to commence and to re-submit the importation criteria separately for full discharge.

Therefore, this enclosed application provides the importation criteria requested by the EA and accordingly seeks to fully discharge the requirements of Condition B24.

A separate application will be submitted in due course to full discharge the requirements for Conditions F10 and F15 for the Pavilion, which is located within the wider Ferry Island site.

Accordingly, please find enclosed the following documentation, which has been submitted via the Planning Portal (ref: PP-12388113) in support of this application:

- This Covering Letter;
- Completed application form; and
- Capping Layer Soil Import Specification prepared by CGL.

The application fee of £116 has been paid via the Planning Portal in accordance with The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2017.

I trust that this enables you to register and validate the application but please do not hesitate to contact me should you require any further information or if you have any queries at this stage.

Yours sincerely

Matt Eyre
Associate



Annex 1 – Condition wording

Condition B24 states:

“Contaminated Land – Part 1 (LBH Environmental Health)”

Prior to the commencement of the development on Plot B (other than for investigative work):

a) Using the information obtained from the previous assessments, an additional site investigation, sampling and analysis shall be undertaken at the Plot as appropriate.

The investigation must be comprehensive enough to enable:-

i) A risk assessment to be undertaken,

ii) Refinement of the Conceptual Model, and

ii) The development of a Method Statement detailing the remediation requirements.

The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.

b) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements in respect of the Plot, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on the Plot.

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



Annex 2 – EA Response dated 30 January 2023

Martin Cowie
Quod
8 (First Floor) Meard Street
London
W1F 0EQ

Our ref: NE/2022/135208/01-L03
Charging ref: ENVPAC/1/HNL/00410
Date: 30 January 2023

Dear Martin,

Charged meeting to discuss the HGY/2022/0779 for the discharge of conditions B19 (monitoring and maintenance plan - contamination - Environment Agency) in relation to plot b (ferry island site) of the Tottenham Hale Centre planning permission (LPA REF: HGY/2018/2223) Dated 27 March 2019.

Based on a review of the information submitted for the above charging agreement, we support the full discharge of conditions:

- B19 (Monitoring and Maintenance Plan – Contamination)
- B21 (piling or other intrusive ground works)

and the partial discharge of condition:

- B24 (Contaminated Land)

Please see our reasons below.

These comments are provided under our pre-application charged service. To facilitate the formal discharge of conditions, the LPA will need to formally consult the Environment Agency. Please include this letter when reconsulting the Environment Agency for the discharge of conditions B19, B21 and B24.

Documents reviewed

Ground Investigation Report- Factual, Ferry Island, Prepared for: Midgard, Issue 00 (Concept, Ref 22/3722-GIR-F01, 30/09/2022).

Ferry Island Method Statement CFA Piling (JRL Civil Engineering Ltd, Ref T22001-SSOW#001, 12 October 2022).

Plot B, Ferry Island, Tottenham Vale Masterplan Redevelopment, Remediation Strategy (CGL, RefCG/39277A, Rev 1, November 2022).

Concept Site Investigations (September 2022). Ground Investigation Report – Factual. Ferry Island. Concept: 22/3722-GIR-F01 – Technical Note of Findings of Additional Ground Investigation (CGL, Ref CG/39277A, 28 Nov 2022).

Neville,K. (2022) Letter to Scott Lewis 28 November.

Condition B19 (Monitoring and Maintenance Plan – Contamination) and B24 (Contaminated Land)

The Environment Agency notes that the site has been subject to an additional round of site investigation, the results of which provide confirmation that areas of the site to be

Cont/d..



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developed are not impacted by chlorinated hydrocarbons to a degree which would pose a risk to controlled waters.

While areas of the site are to be piled, a risk assessment has been provided demonstrating that piles will terminate within the more cohesive deposits of the Lambeth group, which, in combination with the very low levels of contamination encountered results in a low risk.

Based on the this and considering that there exists a robust discovery strategy to be supervised by experience environmental consultants the Environment Agency is able to recommend the partial discharge of condition 24.

A full discharge will be possible once importation criteria have been agreed, however it is noted that these are not relevant to the current stage of works. Additional comment regarding the requirements of any imported material will be provided by the Environment Agency in due course.

As the risk posed to controlled waters is considered very low, it is possible to support the full discharge of condition 19- Monitoring and Maintenance.

Conditions B21 (piling or other intrusive ground works)

The Environment Agency has previously recommended the partial discharge of Condition B21 to allow for the installation of deep boreholes. Having reviewed the piling risk assessment, it is possible to agree to the full discharge of Condition B21.

Final comments

For the avoidance of doubt this confirmation relates solely to the submission of any future discharge of conditions application and should not be considered an indication of whether the Environment Agency is likely to grant an Environmental Permit in relation to the proposed development.

Please note this response is based on the information you have made available and our best available datasets at the time of this response. It is based on current national planning policy, associated legislation, and environmental data / information. If any of these elements change, we may need to reconsider our position.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

Isabel Smith
Planning Advisor

E-mail: HNL.SustainablePlaces@environment-agency.gov.uk | Tel: 02077142206