

Philip Elliott
London Borough of Haringey

Reference: EQ-0009302/01
Customer reference: HGY/2026/2148
18 August 2026

Request for an Environmental Impact Assessment (EIA) Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for the redevelopment of the site comprising of two new buildings ranging between 6-24 storeys, with a maximum height of 90m AOD, to accommodate Use Classes C3, E/F2 and Sui Generis, providing approximately 540 shared-living units¹ and 87 residential units with provision of non-residential floorspaces on the ground floors to each building. The Proposed Development will be set around an extensive public realm, communal open spaces, landscaping, with associated blue-badge residents parking and ancillary infrastructure.

Ashley House, Ashley Road, London, N17 9LZ

Dear Philip,

Thank you for contacting us on the above Scoping Opinion - your consultation HGY/2026/2148

Upon review of the above document, we have the following comments to make in line with our remit. For ease, our comments have been sectioned into flood risk, permitted sites and groundwater and contaminated land.

Flood Risk

The site is located within Flood Zone 2 defined as having 'medium' risk of flooding. The applicant has correctly identified the flood risk and the requirement to produce a site-specific flood risk assessment (FRA). We have no concerns with this matter being 'scoped out' of the EIA.

We recommend that the council, and applicants refer to the [Flood Risk Standing Advice](#) (FRSA) pages on gov.uk.

FRSA is a series of standard comments for local planning authorities (LPAs) and planning applicants to refer to on 'lower risk' development proposals where flood risk is an issue. These comments replace the requirement for direct case by case consultation with us.

Groundwater and Contaminated Land

The current or previous use(s) of the proposed site suggest that the land may be affected by contamination. Land contamination can harm human health, soils, ecosystems, property, drinking waters supplies, groundwater and surface water.

Land contamination is a material planning consideration. The planning decision should ensure that the site is suitable for its proposed use, considering any risks from contamination and any proposed land remediation. The planning application should therefore be supported by adequate site investigation information, prepared by a competent person. After remediation is carried out, as a minimum, the land should not be capable of being determined as contaminated land under [Part IIA of the Environmental Protection Act 1990](#). This approach is supported by paragraph 196 of the National Planning Policy Framework.

The current or previous use(s) of the site may present an unacceptable risk of contamination that could be mobilised during site works and construction, potentially leading to pollution of controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is:

- Within Source Protection Zone 2

The submitted Scoping Opinion has identified the risks and the requirement for a preliminary risk assessment (PRA). We have no concern with this issue being 'scoped out' of the EIA as it will be submitted with any planning application.

Please note that we have not reviewed the PRA in detail at this stage. We may provide further comment at the planning application stage.

We expect reports and Risk Assessments to be prepared in line with our [Groundwater Protection](#) guidance.

In order to protect groundwater quality from further deterioration:

- No infiltration-based sustainable drainage systems should be constructed on land affected by contamination, as contaminants can remobilise and cause groundwater pollution.
- Piling, or any other foundation designs using penetrative methods, should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution.
- Decommission of investigative boreholes to ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water

supplies, in line with paragraph 170 of the National Planning Policy Framework.

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. The competent person would normally be expected to be a chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.

Permitted Sites

We regulate industrial facilities within 50 metres of the proposed development.

- 80707 - Restore Community Projects
- 80348 - Hadnall Limited

You should take this into account with regard to the proposed development and the design and layout of the potential development.

Please note, our regulation of the site does not extend beyond the Environmental Permit boundary also does not cover any of the non-waste activity on site. Therefore, your decision making will need to take account of issues arising from traffic movements associated with the operation of this site.

Advice to Applicant

Water Efficiency Advice

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

Residential developments

All new residential developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within the Building Regulations 2010. We recommend that wherever possible and in areas of serious

water stress (as identified in our report Water stressed areas - final classification) a higher standard of a maximum of 110 litres per person per day is applied. This standard may already be a requirement of the LPA. A higher standard may be required in future by some LPAs and these should be complied with where applicable.

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.

If you have any questions regarding our response, please contact andrew.goymer@environment-agency.gov.uk.

Yours sincerely,

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