

Valerie Okeiyi
London Borough of Haringey
Development Control
639 High Road
London
N17 8BD

Our ref: NE/2024/136795/01
Your ref: HGY/2024/0466
Date: 19 March 2024

Dear Valerie,

157-159, Hornsey Park Road, London, N8 0JX

Demolition of existing structures and erection of two buildings to provide residential units and class E floorspace; and provision of associated landscaping, a new pedestrian route, car and cycle parking, and refuse and recycling facilities.

Thank you for consulting us on the above application on the 28 of February 2024. As part of the consultation, we have reviewed the following document:

- 'Flood Risk Assessment and Drainage Strategy', prepared by RGP, dated February 2024 (Ref: 7601-RGP-ZZ-00-RP-C-0500).

Environment Agency Position

Based on a review of the submitted information and in the absence of an acceptable Flood Risk Assessment (FRA), **we object** to this application and recommend that planning permission is refused. This is because a culverted main river (Moselle Brook) runs beneath the proposed development.

Reasons:

- The applicant has not provided a map showing the exact location of the culvert in relation to the proposed development.
- The applicant has not assessed whether an 8m buffer zone will be provided between the outer edge of the culvert and the proposed development. Where buildings overhang, we require an 8m buffer zone from the closest part of the building to the culvert.
- It has not been demonstrated that the current condition of the culvert is sufficient and will be maintained for the lifetime of the development.
- It has not been demonstrated that there will be no adverse effects on the structural integrity of the culvert.

This objection is line with Haringey's Development Management Policy DM28 - Protecting and Enhancing Watercourses and Flood Defences.

Overcoming our objection:

To overcome our objection, the applicant should submit a revised FRA which demonstrates that the proposed development will not increase the likelihood of structural

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failure due to additional loading which poses the risk of collapse and potential blockages, increasing flood risk.

In addition, the applicant must:

1. Provide a map showing the exact location of the culvert in relation to the development. The location of the culvert can be found through conducting hand dug trial pits or through other types of location surveys. The applicant must demonstrate that an 8m buffer zone will be provided between the outer edge of the culvert and the proposed development. Where buildings overhang, we require an 8m buffer from the closest part of the building to the culvert.
2. Provide evidence to demonstrate that access to the culvert will be maintained/provided. Where reasonable, improvements to access should be made (e.g. larger, buffer zone). The applicant must consider the space required (8m) for future culvert maintenance or replacement, including the use of vehicles and heavy-duty machinery.
3. Where the culvert is 3rd party owned/maintained (i.e. not EA owned or maintained), the applicant must provide a statement of liability and asset maintenance plan to ensure the culvert will be maintained post construction.
4. Provide evidence that there will be no adverse effects on the structural integrity of the culvert. Loading calculations, vibration information and foundation/pile drawings must be submitted as appropriate.
5. Submit a recent condition survey of the culvert which demonstrate that the culvert is in sufficient condition. If the culvert condition is insufficient, its condition must be improved before we can consider the proposal acceptable. This could be done through maintenance, upgrade or replacement as appropriate.

Advice to Applicant

Flood Risk Activity Permit (FRAP)

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert **including any buried elements** (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Pre-Application Advice

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.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

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

Yours sincerely,

Tanzin Ferdous

Planning Advisor, Hertfordshire and North London Sustainable Places

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