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Development Control
By email:
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Our ref: NE/2015/123795/01-L01
Your ref: HGY/2015/3000
Date: 12 October 2015

Dear Neil

White Hart Lane Stadium, Bill Nicholson Way, 748 High Road, Tottenham, N17 0AP

Proposed demolition and comprehensive phased redevelopment for stadium (class D2) with hotel (class C1), Tottenham Experience (sui generis), sports centre (class D2); community (class D1) and/ or offices (class B1); housing (class C3); and health centre (class D1); together with associated facilities including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works. Details of "appearance" and "landscape" are reserved in relation to the residential buildings and associated community and / or office building. Details of "appearance" and "scale" are reserved in relation to the sports centre building. Details of "appearance" are reserved in relation to the health centre building. The proposal includes the demolition of 3 locally listed buildings. The proposal is EIA development. The application includes works to a listed building for which separate listed building consent is required. As such there is an associated listed building application for internal and external works to a grade ii listed building (744 High Road) (ref: HGY/2015/3001).

Thank you for consulting us with this planning application.

We have **no objections** to the development. The culverted Moselle Brook runs adjacent to the site, but all development falls outside the 8m byelaw buffer zone for development.

Informatives

Surface Water Drainage

This development has the opportunity to offer a significant contribution to ongoing need for sustainable drainage solutions in the Moselle Brook catchment. Although we no longer statutory consultees for surface water flood risk management we have previously looked at the proposals and note number of areas that we consider require further work. We recommend you liaise with Adam Littler at the Lead Local Flood Authority regarding the design of the surface water drainage scheme.



- The applicant has not demonstrated that the storage volume required to attenuate surface water run-off from the critical 1 in 100 chance in any year storm event, with an appropriate allowance for climate change, can be provided on site.
- The applicant has not demonstrated that sustainable drainage systems (SuDS) will be used on site to provide storage for surface water generated on site, in line with the National Planning Policy Framework paragraph 103, that requires development to give priority to the use of SuDS. SuDS can provide multiple betterment from reducing flood risk but also providing green infrastructure, improving water quality (which is known to be poor in this catchment) and improving habitats for wildlife.
- The applicant has not demonstrated that the peak discharge rate for all events up to and including the 1 in 100 chance in any year critical storm event, including an appropriate allowance for climate change, will not exceed 3 times the greenfield runoff rate. Where 3 times the greenfield runoff rate cannot be met, evidence must be provided that demonstrates the greatest feasible reduction has been achieved, which must be a minimum of a 50% reduction in line with the London Plan Supplementary Planning Guidance.

Guidance on the preparation of surface water strategies can be found in the Defra/Environment Agency publication "Preliminary rainfall run-off management for developments". Guidance on climate change allowances can be found within the "Planning Practice Guidance: Flood Risk and Coastal Change": Flood Risk and Coastal Change'

Flood Defence Consent

The development runs adjacent to the culverted Moselle Brook. Under the terms of the Water Resources Act 1991, and the Thames Land Drainage Byelaws 1981, the prior consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of the Moselle Brook, designated a 'main river'.

Groundwater and Contaminated Land

We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals.

We recommend however that the requirements of the National Planning Policy Framework and National Planning Policy Guidance (NPPG) are still followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be additional to the risk to human health that your Environmental Health Department will be looking at.

We expect reports and Risk Assessments to be prepared in line with our 'Groundwater protection: Principles and practice' document (commonly referred to as GP3) and CLR11 (Model Procedures for the Management of Land Contamination).

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.

The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:

- From www.gov.uk:
 - [Groundwater Protection: Principles and Practice \(August 2013\)](#)
 - Our [Technical Guidance Pages](#), which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency's Guiding Principles for Land Contamination) in the 'overarching documents' section
 - Use [MCERTS](#) accredited methods for testing contaminated soils at the site
- From the [National Planning Practice Guidance](#):
 - [Land affected by contamination](#)
- [British Standards](#) when investigating potentially contaminated sites and groundwater:
 - BS 5930: 1999+A2:2010 Code of practice for site investigations
 - BS 10175:2011 Code of practice for investigation of potentially contaminated sites
 - BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points
 - BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters

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.

If you have any further questions please contact us.

Yours sincerely

Edward Crome

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