

Stella Creasy MP
By Email

Our Ref: HNL8387-9641

Date: 7 October 2020

Dear Ms Creasy,

Thank you for your letter dated 29 September 2020 regarding the development at Lea Bridge Gasworks. I am writing on behalf of Simon Moody who has passed this letter onto myself as Hertfordshire and North London Area Director.

As you may be aware, we are a statutory consultee on planning applications under The Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO). While matters relating to groundwater are not part of our statutory remit under the DMPO, we do still provide advice on sites that we consider to be high risk to controlled waters. Human health remains the responsibility of the Environmental Health Team within the Local Planning Authority.

We were consulted on the formal planning application for this site on 12 May 2020. The planning application has been reviewed by our internal technical consultees including our Groundwater and Contaminated Land Team, Waste Team, and Partnership and Strategic Overview Team (Flood Risk). We have also engaged with the applicant and their consultants in the pre-application process to develop the remediation strategy and to ensure the works will prevent pollution, protect groundwater and provide environmental betterment at the site.

We consider the site to be highly contaminated due to its previous use as a gasworks and is located within a vulnerable groundwater area in a Source Protection Zone 2. As part of the formal consultation, our Groundwater and Contaminated Land Specialist has reviewed the Outline Remediation Strategy and Remediation Strategy Technical Update. Based on this review, a series of planning conditions have been recommended to ensure the protection of groundwater and prevention of water pollution in line with paragraph 170 of the National Planning Policy Framework (NPPF).

However, as we currently have an outstanding objection on the planning application due to flood risk concerns, the planning conditions have not yet been formally requested in our planning response. Should the flood risk objection be resolved, we are likely to ask for the provision of the following:

- A preliminary risk assessment (PRA)
- Detailed Quantitative Risk Assessment (DQRA)
- Verification Report
- Long term groundwater monitoring

Environment Agency

Alchemy, Bessemer Road, Welwyn Garden City, Hertfordshire, AL7 1HE
www.gov.uk/environment-agency

- Remediation Strategy
- Details of any previously unidentified contamination if found during development
- Details of any Sustainable Urban Drainage Systems (SuDS) or infiltration systems should they be proposed
- Details of piling or intrusive groundworks
- A scheme to manage the decommissioning of investigative boreholes

Each of the planning conditions aim to ensure development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of groundwater pollution from contamination at the development site.

To discharge these conditions, the applicant will need to submit the relevant technical information to Waltham Forest Local Planning Authority, which will be reviewed in consultation with ourselves. Our Groundwater and Contaminated Land team will review the documents in regards to our remit and the recommended conditions to ensure the development is in line with national planning policy and to ensure the protection on groundwater. From our review we will provide a recommendation to the discharge of condition application, however it is up to Waltham Forest to make the final decision on the application.

If you would like to discuss this matter further you can contact Lucy Read on 020 84748081 or at lucy.read@environment-agency.gov.uk.

Yours sincerely

Sam Lumb

Area Director – Hertfordshire and North London

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Pronouns: she/her