

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2020/0635

Ward: White Hart Lane

Address: 555 White Hart Lane N17 7RP

Proposal: Demolition of existing structures and construction of two buildings to provide eight units for light industrial (Use Class B1(c); industrial (Use Class B2); and/or storage and distribution (Use Class B8)) purposes, with ancillary offices and associated landscaping, car parking, servicing and access arrangements.

Applicant: SEGRO plc

Ownership: Private

Case Officer Contact: Laurence Ackrill

Site Visit Date: 18/03/2020

1.1 The application is being reported to the Planning Committee as it is a major application.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposed development would provide significant employment space within a site designated Locally Significant Industrial Site and is acceptable in principle.
- The proposal has the potential to create up to 250 jobs within Haringey.
- The proposed scale and design of the development is appropriate within the context of the site and would be of high quality and have a positive impact on the visual appearance of the area.
- The impact of the development on residential amenities is acceptable.
- The development would provide sufficient number of appropriately located car and cycle parking, would encourage sustainable transport initiatives and include appropriate mitigation measures to minimise impacts upon the public highway.
- The development would achieve zero carbon status and renewables objectives.
- The proposal would provide additional replacement / additional soft-landscaping measures.

2. RECOMMENDATION

2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or Assistant Director for Planning is authorised to

issue the planning permission and impose conditions and informatives subject to the signing of a section 106 Legal Agreement providing for the obligation set out in the Heads of Terms below and referral to the Mayor of London.

- 2.2 That delegated authority be granted to the Head of Development Management or the Assistant Director Planning to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chairman (or in their absence the Vice-Chairman) of the Sub-Committee.
- 2.3 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 12/09/2020 or within such extended time as the Head of Development Management or the Assistant Director Planning shall in her/his sole discretion allow; and
- 2.4 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission be granted in accordance with the Planning Application subject to the attachment of the conditions.

Conditions (the full text of recommended conditions is contained in Appendix 1 of this report)

- 1) Development begun no later than three years from date of decision
- 2) In accordance with approved plans
- 3) Materials submitted for approval
- 4) Restriction in use classes
- 5) Restriction in outside storage
- 6) Restriction in increase of floorspace
- 7) No satellites dishes or telecoms on roof
- 8) Retention of parking spaces
- 9) Hard and soft landscaping measures
- 10) details of external lighting
- 11) Secure by design
- 12) Scheme of refuse storage
- 13) BREEAM accreditation
- 14) Mechanical Ventilation and Heat Recovery
- 15) Energy statement
- 16) Details of living walls and roofs
- 17) On site habitats
- 18) Land contamination
- 19) Unexpected contamination
- 20) NRMM
- 21) Demolition Environmental Management Plan
- 22) Thames Water confirmation of all upgrades

- 23) Cycle parking Design and Layout
- 24) Electric charging points

Informatives

- 1) Co-operation
- 2) CIL liable
- 3) Hours of construction
- 4) Party Wall Act

Section 106 Heads of Terms:

- 1) Public Realm and Highway Improvements on White Hart Lane and Swaffham Way.
- 2) Energy Statement Update and Review
- 3) Considerate Contractor Scheme Registration
- 4) Parking Management Contribution
- 5) Workplace Travel Plan
- 6) Bust stop upgrades
- 7) Control Parking Zone CPZ
- 8) Section 278 Highways works
- 9) Construction Management Plan
- 10) Parking Management Plan
- 11) Employment Initiatives
- 12) Monitoring Contribution

2.5 In the event that member choose to make a decision contrary to officers' recommendation members will need to state their reasons.

2.6 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.2) above, the planning permission be refused for the following reasons:

- 1. *The proposed development, in the absence of a legal agreement to work with the Council's Employment and Skills team would fail to support local employment, regeneration and address local unemployment by facilitating training opportunities for the local population. As such, the proposal is contrary to Local Plan 2017 Policies SP8 and SP9.*
- 2. *The proposed development, in the absence of a legal agreement to secure planning obligations for mitigation measures to promote sustainable transport, by reason of its lack of car parking provision would significantly exacerbate pressure for on-street parking spaces in surrounding streets, prejudicing the free flow of traffic and conditions of general safety along the neighbouring highway and would be detrimental to the amenity of local residents. As such, the proposal is contrary to Policy 6.13 of the London Plan 2016, SP7 of the Local Plan 2017 and*

Policy DM32 of the Development Management Development Plan Document 2017.

- 3. The proposed development, in the absence of a legal agreement securing sufficient energy efficiency measures and/or financial contribution towards carbon offsetting, would result in an unacceptable level of carbon dioxide emissions. As such, the proposal would be contrary to Policies 5.2, 5.3 and 5.7 of the London Plan 2016, Local Plan 2017 Policy SP4 and Policy DM21 of the Development Management Development Plan Document 2017.*

 - 4. The proposed development, in the absence of a legal agreement to secure works to the public highway and other public realm improvements including White Hart Lane and the connection through Swaffham Way, would have an unacceptable negative impact the visual amenity of the area and the operation of the public highway. As such, the proposal would be contrary to Policies DM1 and DM33 of the Development Management DPD 2017, Policy 7.5 of the London Plan 2016.*
- 2.7 In the event that the Planning Application is refused for the reasons set out in resolution (2.6) above, the Head of Development Management (in consultation with the Chair of Planning sub-committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:
- (i) There has not been any material change in circumstances in the relevant planning considerations, and
 - (ii) The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and
 - (iii) The relevant parties shall have previously entered into the agreement contemplated in resolution (1) above to secure the obligations specified therein.

CONTENTS

3. PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS
4. CONSULTATION RESPONSE
5. LOCAL REPRESENTATIONS
6. MATERIAL PLANNING CONSIDERATIONS
7. COMMUNITY INFRASTRUCTURE LEVY
8. RECOMMENDATION
9. PLANNING CONDITIONS & INFORMATIVES

APPENDICES:

- | | |
|------------|--------------------------------------|
| Appendix 1 | Planning Conditions and Informatives |
| Appendix 2 | Consultation Responses |
| Appendix 3 | Plans and Images |
| Appendix 4 | TPO Plan |
| Appendix 5 | Full GLA Stage 1 Response |

3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1 Proposed development

- 3.2 This is an application for the demolition of remaining existing structures on the site and construction of two buildings to provide eight units for light industrial (Use Class B1(c); industrial (Use Class B2); and/or storage and distribution (Use Class B8)) purposes, with ancillary offices and associated landscaping, car parking, servicing and access arrangements.

3.3 Site and Surroundings

- 3.4 The site is located to the north side of White Hart Lane and east of the junction with Rivulet Road. The site was previously occupied by buildings in warehousing and light industrial uses prior to being destroyed in a fire and have since been removed. There is also some ancillary office, café and retail floor space that form part of the current land uses that face on to White Hart Lane and is the only built form element that remains at the site. The site has vehicular access from White Hart Lane and a secondary pedestrian access from Swaffham Way which leads through to Thetford Close to the north. There are level changes between this site and the residential land to the north with this site being approximately 300mm lower. There is an existing retaining wall on that particular boundary.
- 3.5 The site is designated as a Locally Significant Industrial Site (LSIS). The land adjoining the site to the west as part of the New River Sports and Recreation Centre is designated as Metropolitan Open Land (MOL) and also a Local Site of Importance for Nature Conservation. The site is not located on or in MoL. None of the buildings on the site are statutorily Listed, nor is the site located within or adjacent to any conservation areas. Part of the site, toward the north-east corner of the site along the boundary with properties along Norfolk Avenue is covered by a Tree Preservation Order.

3.6 Relevant Planning and Enforcement history

HGY/2020/0117 - 555 White Hart Lane London N17 7RP - Town & country planning (environmental impact assessment) regulations 2017 (as amended) - regulation 6 - request for a screening opinion - EIA not required - 19/02/2020.

4. CONSULTATION RESPONSE

4.1. Greater London Authority – Pre Application Meeting

- 4.2 This was held with GLA on the 15th January 2020.

4.3 Application Consultation

- 4.4 The following were consulted regarding the application:
- 4.5 Internal Representation Summary (expanded comments within Appendix 2)
- 4.6 Design Officer – Supportive of the proposed scale, layout, and design of the development.
- 4.7 Arboricultural Officer – No objection to proposed development.
- 4.8 Policy Officer – Supportive of proposal
- 4.9 Waste Management – No objection to proposal
- 4.10 Drainage Officer – No objection, subject to conditions
- 4.11 Carbon Management Officer – Supportive of proposed development subject to conditions
- 4.12 Pollution Officer – No objection subject to conditions
- 4.13 External Representation Summary
- 4.14 GLA – No objection following the provision of additional information
- 4.15 TFL – No objection subject to conditions and S106 contributions towards safety improvements to Swaffham Way and bus stop upgrades.
- 4.16 Thames Water – No objection subject to conditions

5. LOCAL REPRESENTATIONS

- 5.1 The following were consulted:

- 217 Neighbouring properties
- 3 Ward Councillors
- 4 site notices were erected close to the site

- 5.2 The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

- No of individual responses: 1
- Objecting: 1
- Supporting: 0
- Others: 0

- 5.3 The following local groups/societies made representations:

- None

5.4 The following Councillor made representations:

- None

5.5 The issues raised in representations that are material to the determination of the application are set out in Appendix 1 and summarised as follows:

- Overbearing impact on neighbouring occupiers
- Fire risk
- Subsidence (Officer Comment: the construction works would be subject to building control regulations which seek to ensure that any development is structurally sound).
- Impact on mobile phone reception

6.0 MATERIAL PLANNING CONSIDERATIONS

6.1 The main planning issues raised by the proposed development are:

1. Principle of the development
2. The impact on the amenity of adjoining occupiers
3. Design and impact of the proposed development on the character and appearance of the area
4. Parking and highway safety
5. Sustainability
6. Flood risk and drainage
7. Air quality and land contamination
8. Trees
9. Waste and recycling
10. Employment and training
11. Heads of Agreement (as part of recommendation)

6.2 Principle of the development

6.3 The property is identified as a designated Locally Significant Industrial Site (LSIS) which safeguards the land for a range of industrial uses – Classes ranging from (B1 (b), (c), B2 and B8).

6.4 Policy 4.4 'managing industrial land and premises' of the current London Plan states that the Mayor will work with boroughs and other partners to adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London, including for good quality and affordable space.

6.5 The Intend to Publish London Plan 2019 Policy E4 states that the retention, enhancement and provision of additional industrial capacity should be prioritised in locations that:

- 1) are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport.
- 2) provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population
- 3) provide capacity for micro, small and medium-sized enterprises
- 4) are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments subject to existing provision
- 5) support access to supply chains and local employment in industrial and related activities.

6.6 Strategic Policy SP8 of the Council's Local Plan indicates that there is a presumption to support industry and business in the borough through safeguarding designated land for a range industrial uses The Council will secure a strong economy in Haringey and protect the Borough's hierarchy of employment land, Strategic Industrial Locations, Locally Significant Industrial Sites, Local Employment Areas and other non-designated employment sites. The forecast demand is for an additional 23,800 m2 of B Class floor space up to 2026. This forecast demand is to be met through:

- The reconfiguration and re-use of surplus employment designated land in B2 and B8 Use Classes;
- The intensification of the use of existing employment sites (where possible);
- The provision of B1a/b floor space as part of mixed-use development on suitable sites, including town centre sites; and
- The protection of existing viable B Class Uses on designated and non-designated sites.

6.7 In addition, the Council will also:

- Support local employment and regeneration aims;
- Support environmental policies to minimise travel to work;
- Support small and medium sized businesses that need employment land and space; and
- Contribute to the need for a diverse north London and London economy including the need to promote industry in general in the Upper Lea Valley and in particular, promote modern manufacturing, business innovation, green/waste industries, transport, distribution and logistics.

6.8 Moreover, policy DM37 of the Council's Development Management DPD states that within designated Locally Significant Industrial Sites, proposals for the

intensification, renewal and modernisation of employment land and floor space will be supported where the development:

- a. Is consistent with the range of acceptable uses in Policy SP8;
- b. Wherever possible, is designed to allow for future flexibility of use including subdivision and/or amalgamation to provide for a range of business types and sizes, including small businesses;
- c. Makes adequate provision of space for on-site servicing and waiting goods vehicles;
- d. Improves and enhances the quality of the environment of the site and business area; and
- e. Makes a demonstrable improvement in the use of the site for employment purposes, having regard to:
 - i. The quality and type of employment floor space provided;
 - ii. The quality and density of jobs to be accommodated on-site; and
 - iii. The proposal's contribution to the achievement of economic objectives and outcomes set out in the Local Plan and the Council's other key plans and strategies.

6.9 The site previously comprised a main warehouse building which was divided into self-storage units, various offices and transportation businesses, a coach company, tyre fitting business and a laundry service. However, the site experienced significant fire damage in September 2017 which destroyed approximately 75% of the building. The remaining building has since been demolished. The only building remaining on the site is a two-storey office building facing onto White Hart Lane. As such, the majority of the site is vacant.

6.10 The proposed development will provide 8 new units for flexible Class B1(c), B2 and B8 purposes, totalling 17,263 sqm (GIA). This is a notable increase on the amount of floorspace which previously existed on the site (circa 15,000 sqm GIA). The proposal has been developed to meet the needs of various types and sizes of occupiers and will secure the redevelopment of this vacant site and contribute to the delivery of high quality employment floorspace in Haringey. The site would be developed and managed by SEGRO who aim for the scheme to be a flagship urban logistics centre that would set a benchmark for what industrial sites will look like in the future. SEGRO are one of the main developers specialising in developing industrial land to optimise employment generating opportunities and quality facilities for new and existing businesses.

6.11 Based on the proposed uses and floorspace, the proposed development would result in the creation of around 250 jobs on site. There would also be indirect employment opportunities associated with the scheme once operational, totalling an estimate of around 115 jobs. As detailed further on in this report, the applicant will also work with the Council and local recruitment agencies to provide skills and training opportunities for local residents. This weighs heavily in favour of the development.

6.12 Overall, the scheme has the potential to make a notable contribution to increasing local employment levels. The proposed development will therefore contribute to addressing the Council's employment needs for the local population, in accordance with the aforementioned policies. The proposed development is considered acceptable in principle, subject to further details to demonstrate compliance with Points a-e set out in Policy DM37.

6.13 Impact on the amenity of adjoining occupiers

6.14 The London Plan (2016) Policy 7.6 Architecture states that development must not cause unacceptable harm to the amenity of surrounding land and buildings. DM Policy (2017) DM1 'Delivering High Quality Design' states that development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours. The Council will support proposals that provide appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development and address issues of vibration, noise, fumes, odour, light pollution and microclimatic conditions likely to arise from the use and activities of the development.

6.15 Concerns have been raised by a neighbouring occupier in relation to the building appearing overbearing. However, the proposed building would be located a minimum of approximately 9 metres from the closest neighbouring residential boundary line and over 13 metres to the closest flank wall at No. 142 Norfolk Avenue. The northern boundary, to the residential neighbours, would include much more of a buffer than present / historically, with a raised, densely planted zone along the boundary and with the new industrial units turning their backs to the housing (unlike previously where the area closest to the rear gardens to the north boundary was used for vehicular access and parking).

6.16 As such, the building would be set back sufficiently as to not appear overbearing and would also be largely screened from view by the existing and proposed levels of soft-landscaping. Whilst the buildings would be situated closer towards the rear gardens, (minimum 9 metres from the boundary) as opposed to the previous buildings on the site (minimum 18 metres) the more sympathetic design of the building and designated soft-landscaped buffer along the northern boundary would significantly improve the visual appearance of the site when viewed from neighbouring residential properties. In addition, the potential nuisance of vehicles driving close to the residential boundaries has been removed as there is now no parking, loading or unloading behind the building.

6.17 In terms of noise, the proposed development would run unrestricted in hours of operation, which was the case at the site historically. An assessment of the

existing ambient and background noise levels has been undertaken at the boundary to the nearest residential properties to the north and south of the proposal and assessed against the likely levels of noise that would be created by a development of this type and scale.

- 6.18 The assessment shows that the impact from operation of the proposal, when assessed against national guidance and existing noise levels, that the proposal could operate without mitigation or restrictions in operating hours. A condition would also be attached to ensure that any noise from plants or equipment to be used would not result in a noise nuisance to any neighbouring occupiers within statutory guidelines.
- 6.19 Regard also has to be given to the proposal improving on the previous activities carried out at the site by removing the yards and operational spaces adjacent to the residential properties to the northern boundary, with the backs of the proposed buildings effectively acting as a screen between the levels of noise and light produced by the development and the closest neighbouring residential units.
- 6.20 The applicant has also provided a Daylight / Sunlight Study which shows that the proposed development would satisfy the BRE direct sunlight to windows requirements.
- 6.21 It is also noted that the proposed buildings would not breach 25° when measured from the rear windows of properties along Norfolk Avenue and Thetford Close. Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (2nd Edition, Littlefair, 2011) known as "The BRE Guide", states that where the angle in a section between an existing window and a proposal is less than 25°, there will not be a noticeable loss of daylight.
- 6.22 Overall, the proposed development would have an acceptable impact upon the residential amenity of neighbouring occupiers.

6.23 Design and impact on the character and appearance of the area

- 6.24 DM Policy (2015) DM1 'Delivering High Quality Design' states that development proposals should relate positively to their locality, having regard to, building heights, form, scale & massing prevailing around the site, urban grain, sense of enclosure and, where appropriate, following existing building lines, rhythm of any neighbouring or local regular plot and building widths, active, lively frontages to the public realm, and distinctive local architectural styles, detailing and materials. Local Plan (2017) Policy SP11 states that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. Development shall be of the highest standard of design that respects its local context and character and historic significance, to contribute to the creation and enhancement of Haringey's

sense of place and identity which is supported by London Plan (2016) Policies 7.4 and 7.6.

- 6.25 The proposed frontage facing on to White Hart Lane, including the inclusion of green walls, is broken up with glazing to provide the perception of an active frontage, even though the office based uses would be located towards the inner parts of the site. The creation of an integrated landscaping scheme bringing the public realm up closer to the building line, enlivening and activating the street frontage would be a positive feature.
- 6.26 Within the site, the units are laid out logically and functionally, with clearly demarcated entrances in “feature towers”, delivery and service areas and separate, safe pedestrian approaches. The building will be finished predominantly in profiled metal cladding chosen for durability, with a colour scheme to accentuate corners, enhanced with areas of Green Walls to the street frontage and access road, translucent panels to workspaces and office windows to brise soleil to provide daylight, avoid overheating and add depth to elevations.
- 6.27 The proposal also involves the creation of an outdoor amenity space for employees within the estate along the access route to the existing sub-station at the far north-eastern corner of the site. Access to the sub-station is to be retained. The amenity area will be spacious and a predominantly green landscaped area that would provide both benefits to the scheme in terms of its visual appearance and also to the well-being of employees.
- 6.28 Furthermore, the application also includes improvements to Swaffham Way, a public access route that runs parallel to the western boundary of the site, including re-surfacing and lighting.
- 6.29 Overall, the proposed development would provide significant improvements to the physical appearance of the area, in accordance with the aforementioned policies.

6.30 Parking and highway safety

- 6.31 Local Plan (2017) Policy SP7 Transport states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This is supported by DM Policy (2017) DM31 ‘Sustainable Transport’.
- 6.32 The site is located to the northeast of the Borough on White Hart Lane some 550 meters from the junction with the A10 Great Cambridge Road close to the borough boundary with Enfield, the site has a Public Transport Access Level (PTAL) ranging from 0 to 1b, on a scale of 0 to 6b, where 6b is highest, the site is served

by the W3 bus route and is within walking distance five bus routes on the Great Cambridge Road.

Trip Generation

6.33 Officers have reviewed a number of scenarios in relation to the trips that are likely to be generated by the proposed development based on the public transport accessibility of the site, the proposed uses and parking provision in the worst case scenario the proposed development would generate 262veh/hr (am peak) and 212 veh/hr (pm peak). The corresponding peak parking accumulation is 182 vehicles. This is considered to be the worst case scenario for the parking demand generated by the development proposal and is unlikely to happen however this represents a robust appraisal of the development.

6.34 Impact on the network.

The applicant's transport consultant has undertaken modelling of the highway network including the access junction to the site and the junction of the A10 Great Cambridge Road with White Hart Lane. The results of the modelling has demonstrated that there will be a slight increase in the number of vehicles queuing at the junction, this junction is on the Transport for London Road network TLRN. TfL has not raised any objection to the minor increase in traffic at the junction created by the proposal and the minor increase in delays. The assessment of the access junction to the site has demonstrated that the relocated access to the site will not have any impact on White Hart Lane. However transport officers have requested that the right turn lane to the site is incorporated in the preliminary highways design to reduce any potential delay to the W3 bus service, the highways designs and implementation is to be secured by the S.278 agreement.

Impact on walking and cycling

6.35 An Active Travel Zone (ATZ) assessment has been undertaken with five key routes to nearby destinations including Wood Green Town Centre, White Hart Lane station and the strategic cycle network; however, the assessment has overlooked Swaffham Way. As site visit has indicated that the path could benefit from lighting improvements and improvement to the cycle barriers, we are therefore seeking a S.106 contribution of £15,000 toward environmental improvements to Swaffham way. This is a well-used pedestrian link linking White Hart Lane to the residential area north of the site, improved lighting and maintenance along this route will help address concerns regarding safety.

6.36 A number of accidents were highlighted in the accident analysis at the junction of Perth Road with White Hart Lane, we have since implemented a local safety scheme by raising the junction to address the accident issues and have concluded the additional traffic generated by the development is unlikely to increase the collision at this junction.

6.37 Officers have assessed the impacts of the trips generated by the site on the local bus service, the increase in the number of trips generated by the development will not adversely impact on the operation of the W3 and other bus services, TfL will however be seeking a capped contribution of £12,000 for the upgrade of the nearby bus stop NL.

Highways Design and impact

6.38 The existing site has two vehicular access, the developer is seeking to stop up one of the existing accesses and create a new vehicular and pedestrian site access to the eastern extent of the site frontage from White Hart Lane. The proposal provides dedicated pedestrian and cyclist access gates and two crossing points with tactile paving to facilitate safe pedestrian access. As part of the proposed new access we will be seeking to include a new pedestrian crossing point across White Hart Lane just south of the proposed site access given the uplift in pedestrian movements from the westbound bus stop. The works will be secured by a S.278 agreement.

Car Parking and cycle Parking

6.39 The applicant is proposing a total of 93 car parking spaces and 18 spaces for HGVs, the parking provision has been discussed with the applicant and is based on the trip generation sensitivity testing which sets out that the development could generate a total of between 131-182 car parking space need which will potentially generate a shortfall of between 38-89 car parking spaces. It is to be noted that the proposed car parking provision including blue badge and electric and ultra-low emission vehicle provision complies with the standards set out in London Plan policy T6. In order to deal with the potential overspill of parking onto the local highways network a financial contribution of £30,000 is sought towards the design, consultation and implementation of parking control measures in the area surrounding the site. We will also require a Parking Design and Management Plan to be secured by the S 106 agreement and this is to be monitored as part of the Travel Plan.

6.40 The number of cycle parking spaces proposed exceeds Intend to Publish London Plan policy T5, an additional cycle amenity hub with maintenance facilities is to be provided, accessible to all site users within the public realm to the east of the site; the London Cycling Design Standards (LCDS) requires at least five percent of cycle spaces to accommodate larger and adapted cycles. This must be secured by condition.

Travel Planning

6.41 A framework travel plan has been produced to support this application. Whilst it is noted that individual tenants will implement their own travel plans with specific targets for their workforce, an overarching five-year site mode split target, reflecting the Mayor's strategic target for 75% of all trips in Outer London to be made on foot, by cycle or using public transport should be provided. We will therefore require a revised travel plan to be submitted before occupation to reflect the above targets, in addition we will require the provision of shower, lockers, changing facilities and a bicycle user group in accordance with Intent to Publish London Plan policy T5 requirements.

Construction Logistics and Construction Travel Plan

6.42 A draft Construction Logistics Plan (CLP) forms part of the submitted transport assessment, the applicant has committed to scheduling all construction related deliveries outside of peak highway periods. However, further details are needed on measures to ensure safety, including maintaining safe cycling and walking routes throughout the construction period and an indicative figure for the number of vehicle trips associated with each construction phase should be provided. The applicant should commit to using FORS Silver or above accredited operators as it is imperative that road safety measures are considered, and preventative measures delivered through the construction phases of the development. A full Construction Logistics Plan and Construction Travel Plan should be prepared in accordance with TfL guidance and submitted for approval before development including demolition commences on site.

Deliveries & Servicing

6.43 An overarching outline delivery and servicing plan (DSP) has been provided which sets out that individual units will produce their own bespoke DSPs. These should look to encourage, enable and promote sustainable and active freight, and ensure that these activities take place outside of peak times, this will be secured by condition.

6.44 Officers have therefore considered that subject to S.106, S.278 and conditions this application is acceptable with regards to transport impacts.

6.45 Sustainability

6.46 The NPPF, Policies 5.1-5.3 and 5.5-5.9 of the London Plan 2016, and Local Plan Policy SP4 set out the approach to climate change and require developments to meet the highest standards of sustainable design.

6.47 The NPPF, London Plan and local policy require development to meet the highest standards of sustainable design, including the conservation of energy and water; ensuring designs make the most of natural systems and the conserving and enhancing the natural environment. The London Plan requires all non-residential

development to be zero carbon from 2019, achieving a minimum 35 per cent carbon reduction on site beyond Part L 2013 of the Building Regulations. Local Plan Policy the overall target is delivering a 100% improvement on Building Regulations 2013 Part L.

- 6.48 The Energy and Sustainability Statement and BREEAM 2018 Pre-Assessment Report have been submitted with the application and state that the proposed improvement for the development to achieve a 100% reduction in carbon emissions.
- 6.49 The Council's Carbon Management Team have been consulted as part of the submission and note that the development is an exemplary industrial scheme in energy and sustainability terms. It will be a zero-carbon development in terms of its regulated energy and is targeting to achieve a BREEAM 'Excellent' rating.
- 6.50 The development is targeting a score over 76% under the BREEAM Shell & Core criteria, which is equivalent to an 'Excellent' rating. This goes beyond the policy requirement of 'Very Good' and demonstrates that in sustainability terms that the development is striving for an exemplary industrial scheme.
- 6.51 The proposal for living roofs on the stair cores is supported. The detail of the living walls/roofs and biodiversity measures will be provided as part of a planning condition to ensure the benefits are delivered.
- 6.52 Overall, this scheme goes beyond the policy requirements and its Energy & Sustainability strategies are therefore supported, subject to conditions.

6.53 Flood Risk and Drainage

Flood risk

- 6.54 The NPPG identifies the proposal as "less vulnerable" which is appropriate in Flood Zone 1.
- 6.55 A site specific flood risk assessment (FRA) has been provided as part of the application and this shows that the application site has a predominantly low or very low risk of fluvial (river and sea) and pluvial (surface water) flooding. The FRA sets out the mitigation measures which are to be incorporated within the proposed development to address and reduce the risk of flooding to within acceptable levels.
- 6.56 The proposed development will not result in impedance / loss of fluvial or surface water flow routes and the foul water from the development would be discharged to the local foul water sewer.

6.57 Given the above, it is considered that the proposed development is not at risk of flooding and is acceptable in this regard, in accordance with the aforementioned policies.

Drainage

6.58 London Plan (2016) Policy 5.13 'Sustainable drainage' and Local Plan (2017) Policy SP5 'Water Management and Flooding' require developments to utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:

1 store rainwater for later use

2 use infiltration techniques, such as porous surfaces in non-clay areas

3 attenuate rainwater in ponds or open water features for gradual release

4 attenuate rainwater by storing in tanks or sealed water features for gradual release

5 discharge rainwater direct to a watercourse

6 discharge rainwater to a surface water sewer/drain

6.59 The applicant has provided a Drainage Strategy as part of the submission that demonstrates that the foul and surface water drainage systems for the new development will be designed to accommodate the required flows for the lifetime of the development. All surface water run-off from storm events up to and including the 100 year plus 40% climate change will be retained within the overall site and the site will achieve greenfield runoff rates of 3 x Greenfield Rate for the equivalent storm event.

6.60 The Council's SUDS Officer has been consulted as part of the application and raises no objection to the proposed development, subject to conditions. The development is considered acceptable in terms of flooding and drainage.

6.61 Air Quality and Land contamination

Air quality

6.62 London Plan Policy 7.14 states that developments shall minimise increased exposure to existing poor air quality, make provision to address local problems of air quality and promote sustainable design and construction.

6.63 The development achieves the Building Emissions Benchmark (BEB), although, it fails the Transport Emissions Benchmark (TEB) and therefore fails the AQN test. However, a range of additional mitigation measures have been proposed, including additional cycle storage, and ventilation and filtration strategies as well

as a travel plan to encourage active travel. With these in place, there would be no requirement for offsetting measures.

- 6.64 The applicant has also submitted a Dust Management Plan. The Council's Pollution Officer has been consulted as part of the submission and raises no objection, subject to conditions.
- 6.65 The Greater London Authority raised concerns regarding the initial Air Quality Assessment that was submitted. However, the applicant has provided amended / additional information via an updated Air Quality Assessment to address these concerns and will be subject to GLA confirmation of approval

Land contamination

- 6.66 London Plan Policy 5.21 supports the remediation of contaminated sites and to bringing contaminated land back into beneficial use. Policy DM23 requires development proposals on potentially contaminated land to follow a risk management-based protocol to ensure contamination is properly addressed and to carry out investigations to remove or mitigate any risks to local receptors.
- 6.67 The applicant has submitted a Desk Study and Ground Investigation Report indicating that there is low risk to human health from potential contaminants in the made ground.
- 6.68 The Council's Pollution Officer has been consulted as part of the application and has raised no objections, subject to further investigations being made and this is to be secured by way of the imposition of a condition on any grant of planning consent.

6.69 Trees and ecology

- 6.70 DM Policy (2017) DM1 'Delivering High Quality Design' states that the Council will expect development proposals to respond to trees on and close to the site.
- 6.71 Policy DM19 also states that development proposals on sites which are, or are adjacent to, internationally designated sites, Sites of Special Scientific Interest, Local Nature Reserves, Sites of Importance for Nature Conservation or Ecological Corridors, should protect and enhance the nature conservation value of the site.
- 6.72 The site is located adjacent to a Local Site of Importance for Nature Conservation to the west, that forms part of the New River Sports and Recreation Centre. There is also a section of land to the northern boundary within the site that is subject to a Tree Preservation Order (TPO) (Appendix 4). The application includes the removal of a number of trees within the area of land subject to a TPO.

- 6.73 The Council's Tree Officer has been consulted as part of the application and notes that the plan involves the removal of 8 trees within the area of land subject to a TPO, which have crowns which extend beyond the edge of the woodland area and which would interfere with the proposed buildings. It is however proposed to plant 25 new trees within the land to the north of the site, as well as an additional row of trees and a wildflower and grass area along the northern boundary towards the New River Sports Centre, which is Metropolitan Open Land, thus creating a green corridor. There will also be extensive planting of mostly native shrubs and understorey plants throughout the area.
- 6.74 The purpose of the TPO was to protect the area of trees that act as a screen between the site and the residential properties on Norfolk Avenue and for its environmental benefits, rather than because any of the trees were individually of great value. The proposed removal of trees is justified to facilitate the development, and the loss of amenity is more than compensated for by the proposed new planting both to the north of the site and along the northern boundary.
- 6.75 In terms of ecology, the applicant has submitted an Ecological Appraisal which notes that the site itself is considered to be of low ecological value with the majority of the site comprising hardstanding. There is potential for the development to enhance the ecological value of the Site through the inclusion of appropriate landscaping to increase floral diversity and this has been taken into consideration within the landscaping strategy by way of the inclusion of native species. This has been secured through the imposition of a condition on any grant of planning consent.
- 6.76 None of the buildings on Site were considered to be suitable for roosting bats and all were assessed as having negligible Bat Roost Potential. The mixed scattered trees at the site had potential to support nesting birds, as well as this three of these trees were ivy clad and considered to have low Bat Roost Potential. Greater London Authority Officers also commented on the scheme, having considered the characteristics of the scheme, GLA officers are satisfied that the proposed development would not adversely affect the Adjacent Site of Importance for Nature Conservation.

6.77 Waste and Recycling

- 6.78 London Plan Policy 5.16 indicates the Mayor is committed to reducing waste and facilitating a step change in the way in which waste is managed. Local Plan Policy SP6 Waste and Recycling and DPD Policy DM4. requires development proposals make adequate provision for waste and recycling storage and collection.
- 6.79 The Council's Waste Management Team have been consulted on the application and raise no objection to the proposed development, but consider that adequate waste storage arrangements must be made so that waste does not need to be

placed on the public highway other than immediately before it is due to be collected. Full details of this can be adequately secured by way of imposing a condition on any grant of planning consent.

6.80 Employment and Training

6.81 Local Plan Policies SP8 and SP9 aim to support local employment, improve skills and training, and support access to jobs.

6.82 The Council's Planning Obligations SPD requires all major developments to contribute towards local employment and training. The Council requires the developer (and its contractors and sub-contractors) to notify it of job vacancies, to employ a minimum of 20% of the on-site workforce from local residents (including trainees nominated by the Council).

6.83 The applicant has agreed to provide employment opportunities during the construction of the development and this would be secured by legal agreement. As such, the development is acceptable in terms of employment provision.

6.84 Conclusion

6.85 The proposal in accordance with relevant land use and employment policy and has the potential to make a significant contribution to job-creation. The provision of high quality, intensified industrial space is welcomed. In all other respects the development is acceptable subject to mitigation provided by recommended conditions and S106 obligations. All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION

6.86 CIL

6.87 Based on the information given on the plans, the Mayoral CIL charge will be £1,030,221.36 (17,274 sqm x £59.64). The proposal would not be liable for Haringey CIL. This will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index. An informative will be attached advising the applicant of this charge.

7.0 RECOMMENDATIONS

GRANT PERMISSION subject to conditions subject to conditions in Appendix 1 and subject to sec. 106 Legal Agreement.

1) Public Realm and Highway Improvements on White Hart Lane and Swaffham Way.

- 2) Energy Statement Update and Review
- 3) Considerate Contractor Scheme Registration
- 4) Parking Management Contribution
- 5) Workplace Travel Plan
- 6) Bust stop upgrades
- 7) Control Parking Zone CPZ
- 8) Section 278 Highways works
- 9) Construction Management Plan
- 10) Car Parking Management Plan
- 11) Employment Initiatives
- 12) Monitoring Contribution

Applicant's drawing No.(s) Historic Environment Desk-Based Assessment, Flood Risk Assessment, Desk Study and Ground Investigation Report, Preliminary Ecological Appraisal and Bat Roost Potential Survey, Breeam UK New Construction 2018 Pre-Assessment, Sustainability and Energy Strategy, TM 52 Overheating Study, External LED Lighting Assessment Report, Planning Statement, Design & Access Statement, 31136/PL/200A, 31171/PL/201B, 31171/PL/202C, 31171/PL/203A, 31171/PL/202C, 31171/PL/205A, 31171/PL/206A, 31171/PL/207A, 31171/PL/208, 31171/PL/209A, 31171/PL/210A, 31171/PL/211A, 31171/PL/212, 31171/PL/213, 31171/PL/214A, 31171/PL/215, 31171/PL/216, Statement of Community Involvement, Daylight and Sunlight Study, 1812035-TA-01, Visography TRAAC Outputs, Transport Assessment, Framework Travel Plan, Environmental Noise Assessment of a Proposed Industrial Development, Arboricultural Impact Assessment 783.10.05, 783.19.03, 783.29.05, 783.39.03, Foul and Surface Water Drainage Strategy, Landscape Management Schedule & 783.TS.04, 19-074-EX-004, Air Quality Assessment dated 21/05/2020 & Verosol – Silver Screen

Subject to the following condition(s)

Appendix 1

- 1) The development hereby authorised must be begun not later than the expiration of 3 years from the date of this permission, failing which the permission shall be of no effect.

Reason: This condition is imposed by virtue of the provisions of the Planning & Compulsory Purchase Act 2004 and to prevent the accumulation of unimplemented planning permissions.

- 2) The approved plans comprise drawing nos: Historic Environment Desk-Based Assessment, Flood Risk Assessment, Desk Study and Ground Investigation Report, Preliminary Ecological Appraisal and Bat Roost Potential Survey, Breeam UK New Construction 2018 Pre-Assessment, Sustainability and Energy Strategy, TM 52 Overheating Study, External LED Lighting Assessment Report, Planning Statement, Design & Access Statement, 31136/PL/200A, 31171/PL/201B, 31171/PL/202C,

31171/PL/203A, 31171/PL/202C, 31171/PL/205A, 31171/PL/206A, 31171/PL/207A, 31171/PL/208, 31171/PL/209A, 31171/PL/210A, 31171/PL/211A, 31171/PL/212, 31171/PL/213, 31171/PL/214A, 31171/PL/215, 31171/PL/216, Statement of Community Involvement, Daylight and Sunlight Study, 1812035-TA-01, Visography TRAAC Outputs, Transport Assessment, Framework Travel Plan, Environmental Noise Assessment of a Proposed Industrial Development, Arboricultural Impact Assessment 783.10.05, 783.19.03, 783.29.05, 783.39.03, Foul and Surface Water Drainage Strategy, Landscape Management Schedule & 783.TS.04, 19-074-EX-004, Air Quality Assessment dated 21/05/2020 & Verosol – Silver Screen. The development shall be completed in accordance with the approved plans except where conditions attached to this planning permission indicate otherwise or where alternative details have been subsequently approved following an application for a non-material amendment.

Reason: In order to ensure the development is carried out in accordance with the approved details and in the interests of amenity.

3) Samples of materials to be used for the external surfaces of the development shall be submitted to, and approved in writing by, the Local Planning Authority before any above ground development is commenced. Samples should include sample panels or brick types and a roofing material sample combined with a schedule of the exact product references.

Reason: In order for the Local Planning Authority to retain control over the exact materials to be used for the proposed development and to assess the suitability of the samples submitted in the interests of visual amenity consistent with Policy 7.6 of the London Plan 2016, Policy SP11 of the Haringey Local Plan 2017 and Policy DM1 of The Development Management DPD 2017.

4) Notwithstanding the provisions of the Town & Country Planning (Use Classes) Order 1987, or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the premises shall be restricted to use classes B1(c); industrial (Use Class B2); and/or storage and distribution (Use Class B8) purposes only and shall not be used for any other purpose including any purpose within Class B unless approval is obtained to a variation of this condition through the submission of a planning application.

Reason: In order to restrict the use of the premises to one compatible with the surrounding area and in interests of neighbouring residential amenity

5) All merchandise and materials being stored and sold from outside the building / premises shall be stacked or stored no higher than 5 metres without the written consent of the LPA to whom a formal planning application shall be submitted for consideration and determination.

Reason: In order to safeguard the visual amenity of the locality

6) No additional floorspace other than as stated within the application shall be created inside the buildings approved without the prior written consent of the Local Planning Authority.

Reason: To ensure that the car parking provided meets the needs of the buildings approved and that traffic generation does not exceed the allocated capacity.

7) No satellite antenna, apparatus or plant of any sort (including structures or plant in connection with the use of telecommunication systems or any electronic communications apparatus), with the exception of PV panels, shall be erected on the roof of any building.

Reason: In order to safeguard the visual amenity of the area.

8) Before the development hereby permitted is occupied the parking spaces shown on the approved plans shall be provided and shall not thereafter be used for any purpose other than the parking of vehicles in connection with the approved development.

Reason: To ensure that parking is provided in accordance with the Local Planning Authority's standards.

9) No development above ground shall take place until full details of both hard and soft landscape works have been submitted to and approved in writing by the local planning authority and these works shall be carried out as approved. These details shall include: proposed finished levels or contours; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (eg. furniture, play equipment, refuse or other storage units, signs, lighting etc.); proposed and existing functional services above and below ground (eg. drainage power, communications cables, pipelines etc. indicating lines, manholes, supports etc.); retained historic landscape features and proposals for restoration, where relevant.

Soft landscape works shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; implementation programme]. The soft landscaping scheme shall include detailed drawings of:

a. those existing trees to be retained.

b. those existing trees to be removed.

c. those existing trees which will require thinning, pruning, pollarding or lopping as a result of this consent. All such work to be approved in writing by the Local Planning Authority.

d. Those new trees and shrubs to be planted together with a schedule of species shall be submitted to, and approved in writing by, the Local Planning Authority prior to the any above ground works.

Such an approved scheme of planting, seeding or turfing comprised in the approved details of landscaping shall be carried out and implemented in strict accordance with the approved details in the first planting and seeding season following the occupation of the building or the completion of development (whichever is sooner). Any trees or plants, either existing or proposed, which, within a period of five years from the completion of the development die, are removed, become damaged or diseased shall be replaced in the next planting season with a similar size and species. The landscaping scheme, once implemented, is to be retained thereafter.

Reason: In order for the Local Planning Authority to assess the acceptability of any landscaping scheme in relation to the site itself, thereby ensuring a satisfactory setting for the proposed development in the interests of the visual amenity of the area consistent with Policy 7.21 of the London Local Plan 2016, Policy SP11 of the Haringey Local Plan 2013 and Policy DM1 of The Development Management DPD 2017.

10) Prior to the commencement of above ground works on site full details of the all proposed external lighting have been submitted to and approved in writing by the Local Planning Authority. Details shall include appearance and technical details and specifications, intensity, orientation and screening of lamps, siting and the means of construction and layout of cabling. Lighting is to be restricted to those areas where it is necessary with additional shielding to minimise obtrusive effects. The approved scheme is to be fully completed and shall be permanently maintained thereafter.

Reason: In the interest of design quality, residential amenity and public and highway safety.

11) Prior to occupation of the development, details of full Secured by Design' Accreditation shall be submitted in writing to and for approval by the Local Planning Authority. The details shall demonstrate consultation with the Metropolitan Police Designing Out Crime Officers. The development shall be carried out in accordance with the approved details and maintained thereafter.

REASON: To ensure safe and secure development and reduce crime.

12) Prior to occupation of the development, a detailed scheme for the provision of refuse and waste storage and recycling facilities has been submitted to and approved in writing by the Local Planning Authority. Such a scheme as approved shall be implemented and permanently retained thereafter.

Reason: In order to protect the amenities of the locality and to comply with Policy DM4 of The Development Management DPD 2017 and Policy 5.17 of the London Plan 2016.

13) (a) The commercial units shall not be occupied until a final Certificate has been issued certifying that a BREEAM (or any such equivalent national measure of sustainable building which replaces that scheme) rating of 'Excellent' for that unit has been achieved.

(b) The Accreditation of 'Excellent' shall be maintained thereafter unless otherwise agreed in writing with the Local Planning Authority.

REASON: To ensure sustainable development in accordance with London Plan 2016 Polices 5.1, 5.2, 5.3 and 5.9 and Local Plan Policy SP4.

14) Prior to installation, details of the Mechanical Ventilation and Heat Recovery (MVHR) system shall be submitted to the Local Planning Authority. Details should include the efficiency, location of the units to ensure easy access for servicing, plans showing the rigid ducting.

Reason: To ensure the new homes are adequately ventilated as required by London Plan Policy 5.9.

15) (a) The development hereby approved shall be constructed in accordance with the Energy & Sustainability Statement by MBA Consulting Engineers (March 2020) delivering a 122% improvement on carbon emissions over 2013 Building Regulations Part L with high fabric efficiencies, air source heat pumps and solar photovoltaic energy generation. Any application to revise the building fabric or renewable energy technologies should be accompanied by an Energy Assessment to demonstrate the development is still 'zero carbon' in regulated energy terms.

(b) Prior to above ground construction works, details of the air source heat pumps must be submitted to the Local Planning Authority. This should include the location of ASHPs, and if necessary, the mitigation measures for the ASHP, and evidence that the heat pump complies with other relevant issues as outlined in the Microgeneration Certification Scheme Heat Pump Product Certification Requirements.

(c) Prior to occupation of the development, the following overheating measures shall be installed and retained for the lifetime of the development to reduce the risk of overheating in the ancillary offices:

- External Brise Soleil;
- Glazing g-value of 0.45;
- Internal blinds, with a 3% transmittance of solar energy through the fabric and 82% reflectance of solar energy;
- Living walls and trees within the car park areas; and,
- Mechanical ventilation.

(d) Two months prior to the first occupation of the development, confirmation shall be submitted of the maximum possible solar photovoltaic (PV) energy to be generated on the roof. The submission shall include: a roof plan; the number, angle, orientation, type,

and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp) and the final carbon reduction at the Be Green stage of the energy hierarchy. The proposed additional solar array should aim to generate at least 593,000 kWh of renewable electricity per year.

The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained and cleaned at least annually thereafter.

Reason: To comply with London Plan 2016 Policy 5.2 and 5.9 and Local Plan 2017 Policy SP4 in the interest of adapting to climate change and to secure sustainable development.

16) Living Walls and Roofs

(a) Prior to above ground construction works, details of the living roofs and living walls shall be submitted to and approved in writing by the Local Planning Authority. These details shall include:

- i) A roof plan identifying where the living roofs will be located;
- ii) A plan identifying where the living wall will be located and what surface area they will cover;
- iii) Sections of the living walls and roofs;
- iv) Substrate of no less than 120mm for the extensive living roofs;
- v) Details on the diversity of substrate depths and types. Substrate depths across the roofs should provide contours of substrate, such as substrate mounds in areas with the greatest structural support to provide a variation in habitat;
- vi) Details of the location of log piles / flat stones for invertebrates;
- vii) Details on the range of native species of wildflowers and herbs planted to benefit native wildlife. The living roof will not rely on one species of plant life such as Sedum (which are not native);
- viii) Irrigation, management and maintenance arrangements.

(b) The approved living roofs and walls shall be provided before 50% the units are first occupied and shall be managed thereafter in accordance with the approved management arrangements.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan 2016 Policies 5.3, 5.9 and 5.11 and Local Plan 2017 Policy SP4, SP5, SP11 and SP13.

17) On-site Habitats

Prior to above ground works, details of the on-site habitats to be introduced as part of this development must be submitted for approval by the Local Planning Authority. These new on-site habitats should supplement the existing habitats. The applicant should consider including bat and bird boxes in suitable locations on the site.

The development shall then be constructed in strict accordance of the details so approved, and shall provide evidence of these measures to the Local Planning Authority no more than 3 month after construction.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity, in accordance with London Plan 2016 Policies 5.3, 5.9 and 5.11 and Local Plan 2017 Policies SP5 and SP13.

18) Land Contamination

Before development commences other than for investigative work:

- a. A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information.
- b. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority.
- c. If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.
- d. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.
- e. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

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

19) Unexpected contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.

20) NRMM

a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIA of EU Directive 97/68/ EC for both NO_x and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <http://nrmm.london/>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.

b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.

Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ

21) a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst

b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.

The following applies to both Parts a and b above:

a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).

b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:

i. A construction method statement which identifies the stages and details how works will be undertaken;

ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;

iii. Details of plant and machinery to be used during demolition/construction works;

- iv. Details of an Unexploded Ordnance Survey;
 - v. Details of the waste management strategy;
 - vi. Details of community engagement arrangements;
 - vii. Details of any acoustic hoarding;
 - viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);
 - ix. Details of external lighting; and,
 - x. Details of any other standard environmental management and control measures to be implemented.
- c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:
- i. Monitoring and joint working arrangements, where appropriate;
 - ii. Site access and car parking arrangements;
 - iii. Delivery booking systems;
 - iv. Agreed routes to/from the Plot;
 - v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and
 - vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and
 - vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.
- d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:
- i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;
 - ii. Details confirming the Plot has been registered at <http://nrmm.london>;
 - iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;
 - iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);
 - v. A Dust Risk Assessment for the works; and
 - vi. Lorry Parking, in joint arrangement where appropriate.

The development shall be carried out in accordance with the approved details as well as on the applicant submitted Air Quality & Dust Management Plan in Appendix A of the Air Quality Report and the proposed operational impacts mitigation measures following the failure of the Transport Emissions Benchmark (TEB) by the development.

Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.

Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.”

22) Thames Water confirmation of all upgrades

No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

23) Cycle parking Design and Layout

The applicant will be required to provide the correct number of cycle parking spaces in line with the London Plan in addition the cycle parking spaces should be designed and implemented in line with the London Cycle Design Standard. To fully comply with the London Cycling Design Standards (LCDS), at least five percent of cycle parking should be arranged with wider spacing to accommodate larger and adapted cycles

Reason: To promote travel by sustainable modes of transport and to comply with the London Cycling Design Standards.

24) Electric charging points

The applicant will be required to provide 20% of the total number of car parking spaces with active electric charging points, with a further 80% passive provision for future conversion.

Reason: To comply with the London Plan, and reduce carbon emission in line with the Council's Local Plan Policy SP7.

Appendix 2 Consultation Responses from internal and external agencies

Stakeholder	Response
INTERNAL	
Design Officer	<p>The proposals are for a well-considered and carefully designed collection of industrial buildings within an established, existing industrial area, albeit that it borders low rise, residential streets to the north and sports complexes to the west and on the other side of White Hart Lane to the south-east, in one of the more suburban character areas of Haringey.</p> <p>The northern boundary, to the residential neighbours, will become much more buffered than present, with a raised, more densely planted zone</p>

Stakeholder	Response
	<p>along the boundary and with the new industrial units turning their backs to the housing, unlike previously. The western boundary will also have a landscape buffer, including a better quality fence to the existing public footpath between this site and the White Hart Lane Sports Centre. Along the street frontage of the site to White Hart Lane, where it faces Coles Park Football Ground (Haringey Borough FC) and an area of allotments, these proposals will create an enhanced public realm, with a wider, more attractive pavement, seating, landscaping, signage and high quality paving.</p> <p>Within the site, the units are laid out logically and functionally, with clearly demarcated entrances in “feature towers”, delivery and service areas and separate, safe pedestrian approaches. Finished predominantly in profiled metal cladding chosen for durability, with a colour scheme to accentuate corners, enhanced with areas of Green Walls to the street frontage and access road, translucent panels to workspaces and office windows to brise soleil to provide daylight, avoid overheating and add depth to elevations. The requirement to provide access to the electricity sub-station at the far northeast corner of the site will be exploited to create a landscaped amenity area for workers on site.</p> <p>Overall the proposals promise to be a demonstration scheme on how to incorporate modern industrial buildings in a well landscaped, attractive, suburban setting.</p>
Arboricultural Officer	<p>I recently had a meeting on the site with Terry Anderson, who is the Landscape Architect working with the developers, to discuss how the development and landscaping would impact on the Tree Preservation Order (TPO) which is in force at the north-east corner of the site.</p> <p>The plan involves the removal of 8 trees which have crowns which extend beyond the edge of the woodland area and which would interfere with the proposed buildings. It is however proposed to plant 25 new trees within the area of the TPO, as well as well as an additional row of trees and a wildflower and grass area along the northern boundary toward the New River Sports Centre, which is Metropolitan Open Land, thus creating a green corridor. There will also be extensive planting of mostly native shrubs and understorey plants throughout the area. The purpose of the TPO was to protect the area of trees to act as a screen and for its environmental benefits, rather than because any of the trees were individually of great value. In my opinion the proposed removal of trees is justified to facilitate the development, and the loss of amenity is more than compensated for by the proposed new planting both within the TPO area and along the northern boundary.</p>

Stakeholder	Response
	<p>In another matter affecting the same area, UK Power Networks need to do some electricity mains repairs which may adversely affect one or two of the trees within the TPO area – at worst the trees might need to be removed. As statutory undertakers they are entitled to carry out this work without applying for permission, however they did contact us to discuss the matter and we have agreed on a method of proceeding which will minimise the risk of damage to the trees. Terry Anderson is aware of this and has stated:</p> <p>“We discussed the likely repair works to be undertaken by UKPN and that 1 or 2 Cypress trees may need to be removed if trench excavations drastically impact upon their root systems. This would open up views from Norfolk Avenue and it was agreed the Applicant would replace any removed tree to maintain adequate screening between the residential properties and the development.”</p> <p>We won't know the extent of any damage until UKPN have carried out their work.</p>
Policy Officer	<p>The site is located within the White Hart Lane defined employment area (reference DEA8) which is designated as a Locally Significant Industrial Site (LSIS). Policy SP8 of the Local Plan Strategic Policies document sets out that the Council will safeguard Locally Significant Industrial Sites for a range of industrial uses (B1 (b), (c), B2 and B8) where they continue to meet demand and the needs of modern industry and business.</p> <p>Policy DM37 of the Council's Development Management DPD sets out that within Locally Significant Industrial Sites proposals for the intensification, renewal and modernization of employment and will be supported subject to meeting criteria (a) to (e). Criteria (a) is that the proposal is consistent with the range of acceptable uses in Policy SP8 and criteria (b) to (e) primarily relate to design matters.</p> <p>The site previously comprised a main warehouse building which was divided into self-storage units, various offices and transportation businesses, a coach company, tyre fitting business and a laundry service. However, the site experienced significant fire damage in September 2017 which destroyed approximately 75% of the building. The remaining building has since been demolished due to safety concerns. The only building remaining on the site is a two-storey office building facing onto White Hart Lane. As such, the majority of the site is vacant.</p> <p>The proposed development will provide 8 new units for flexible Class</p>

Stakeholder	Response
	<p>B1(c), B2 and B8 purposes, totalling 17,263 sqm (GIA). This is a notable increase on the amount of floorspace which previously existed on the site (circa 15,000 sqm GIA). The proposal will secure the redevelopment of this vacant site, contribute to the delivery of high quality employment floorspace in Haringey and will provide significant improvements to the physical appearance of the area.</p> <p>The uses proposed are compliant with the range of acceptable uses in Policy SP8 and the proposal generally accords with policy E4 in the Intend to Publish London Plan (December 2019). The proposal is therefore acceptable in principle.</p>
Waste management	<p>Adequate waste storage arrangements must be made so that waste does not need to be placed on the public highway other than immediately before it is due to be collected. Further detailed advice can be given on this where required.</p> <p>Any Commercial enterprise must arrange for a scheduled waste collection with a Commercial Waste Contractor. The business owner will need to ensure that they have a cleansing schedule in place and that all waste is always contained. Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</p>
Drainage Officer	<p>The FRA, and the Drainage Strategy for the above development meet Haringey's criteria for approval, subject to conditions.</p>
Carbon Management Officer	<p>This application is an exemplary industrial scheme in energy and sustainability terms. It will be a zero-carbon development in terms of its regulated energy and is targeting to achieve a BREEAM 'Excellent' rating. A few clarifications are requested under the Be Clean/Green measures and the TM52 Overheating Study. Overall, this scheme goes beyond the policy requirements and its Energy & Sustainability strategies are therefore supported, subject to the clarifications provided on the overheating study.</p>
Pollution Officer	<p>Having considered all the submitted supportive information i.e. Design and Access Statement dated February 2020, Planning Statement, Sustainability & Energy Strategy dated 4th March 2020 prepared by MBA Consulting Engineers Ltd taking note of the applicant proposal of the use</p>

Stakeholder	Response
	<p>of solar PV arrays, Air Quality Assessment prepared by Eight Associates Ltd dated 6th March 2020 taking note of the applicant Air Quality & Dust Management Plan in Appendix A and the proposed operational impacts mitigation measures following the failure of the Transport Emissions Benchmark (TEB) by the site as well as the Desk Study and Investigation Report with reference 13499 – HYD – XX- XX-RP-GE-1000 dated 17th February 2020 taken note of the applicant submission in section 9 and 10 of the report that the monitoring is still on-going, please be advise that we have no objection to the proposed development in relation to AQ and Land Contamination but the following planning conditions and informative are recommend should planning permission be granted.</p>
Transportation	
EXTERNAL	
(GLA) Greater London Authority	<p>Initial comments:</p> <p>Principle of development: The principle of providing an increase of industrial floorspace on a Locally Significant Industrial Site is strongly supported.</p> <p>Urban design: The proposal’s design and layout are supported, as they would support the industrial use whilst responding sensitively to the neighbouring residential properties. A fire statement must be submitted in accordance with Policy D12 of the Mayor’s Intend to Publish London Plan.</p> <p>Environment: Additional technical information and mitigation should be provided, including a revised air quality assessment.</p> <p>Transport: The applicant should make improvements to White Hart Lane in line with the Healthy Streets Approach. Contributions are requested towards safety improvements scheme and bus stop upgrades. The provision of a right hand turn at the site’s access from White Hart Lane, as well as the level of HGV parking provision, should be further discussed. Appropriate conditions and planning agreements should be secured.</p> <p>Recommendation</p> <p>That Haringey Council be advised that the application does not yet comply with the London Plan and the Mayor’s Intend to Publish London Plan for the reasons set out in paragraph 50 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan and the Mayor’s Intend to Publish London Plan.</p>

Stakeholder	Response
<p>(TfL) Transport for London</p>	<p>Initial comments:</p> <p>Trip Generation/Modal Split Whilst the applicant's trip generation methodology is generally acceptable, TfL is of the view that it may underestimate the use of buses as a first mode (given the considerable distance to the nearest stations). TfL seeks further discussions on this, in the context of the bus stop upgrade contribution referenced in paragraph 32 below.</p> <p>Healthy Streets and Vision Zero An Active Travel Zone (ATZ) assessment has been undertaken with five key routes to nearby destinations including Wood Green Town Centre, White Hart Lane station and the strategic cycle network. These destinations and routes are considered appropriate, though the assessment has overlooked Swaffham Way. This is a well-used pedestrian link linking White Hart Lane to the residential area north of the site. At the pre-application stage, the developer indicated a willingness to consider funding provision for improved lighting and maintenance along this route to help address local concerns regarding safety; this should therefore be explored further with the Council.</p> <p>Besides works adjacent to the site, the ATZ assessment also identifies the White Hart Lane / Perth Road junction as a Personal Injury Collisions (PIC) cluster. There are emerging proposals by Haringey Council to introduce traffic calming measures and improve road safety on Perth Road and highway works along White Hart Lane, and a contribution should be sought towards enhancements to enable access to the proposed development, in line with the Mayor's intend to publish London Plan policy T2.</p> <p>In addition, a contribution towards upgrading bus stop NL is sought, capped at £12,000 depending on the scale of upgrade necessary.</p> <p>Site Access and Design A new vehicular and pedestrian site access is proposed to the eastern extent of the site frontage from White Hart Lane. Proposals to provide a dedicated pedestrian and cyclist access gate and two crossing points with tactile paving to facilitate safe pedestrian access at this new junction are welcomed, in line with the Mayor's Intend to Publish London Plan policy T2.</p> <p>It is also welcomed that pedestrian footways along White Hart Lane will be reinstated at former access points to establish a continuous pedestrian footway and enable active travel.</p>

Stakeholder	Response
	<p>A Stage 1 Road Safety Audit has been undertaken for access proposals, which suggests a number of improvements. The works proposed include providing a new pedestrian crossing point across White Hart Lane just south of the proposed site access. This is welcomed, given the expected uplift in pedestrian movements from the westbound bus stop. This provision, along with new tactile paving, realigned dropped kerbs and revised road markings, will be implemented through a S278 agreement with Haringey Council.</p> <p>Local modelling of the new access junction has been undertaken and the results are noted. The applicant is encouraged to discuss the retention of a right hand turn further with both the Council and TfL to ensure that the performance of the bus network is not affected. Swept path analysis has been provided to demonstrate site access and internal site movements and is considered acceptable.</p> <p>The hard and soft landscaping proposed within the site is welcomed in line with the Mayor's Intend to Publish London Plan policy D8 with the provision of advisory cycle lanes along both sides of the internal carriageway and marked crossing points for pedestrians enhancing safety in line with the Mayor's 'Vision Zero' objective.</p> <p>Highways Signal junction modelling for White Hart Lane / Great Cambridge Road has also been undertaken. The worst-case sensitivity test scenarios are predicted to result in minor increases to average delay times when compared with 2024 future flows and it is considered that this development will not have a significant impact upon the strategic highway network.</p> <p>Cycle Parking The quantum of cycle parking exceeds the Mayor's Intend to Publish London Plan policy T5 and it is welcomed that an additional cycle amenity hub with maintenance facilities is to be provided, accessible to all site users within the public realm to the east of the site.</p> <p>To fully comply with the London Cycling Design Standards (LCDS), at least five percent of cycle parking should be arranged with wider spacing to accommodate larger and adapted cycles. Shower and changing facilities are to be provided for staff that commute to/from the site in accordance with the Mayor's Intend to Publish London Plan policy T5 requirements.</p> <p>Car Parking</p>

Stakeholder	Response
	<p>Car parking proposed, including blue badge and electric and ultra-low emission vehicle provision, complies with the Mayor's Intend to Publish London Plan policy T6 standards, which is welcomed. However, the provision of 18 spaces for HGVS is considered excessive, when comparable trip generation assessments indicate that a maximum of 6 HGVS would be expected to be on site at any one time. Further justification for this level of provision should be provided.</p> <p>A Parking Design and Management Plan has been produced and the promotion of car sharing for staff movements is welcomed, which should be secured by condition.</p> <p>Travel Planning A framework travel plan has been produced to support this application. Whilst it is noted that individual tenants will implement their own travel plans with specific targets for their workforce, an overarching five-year site mode split target, reflecting the Mayor's strategic target for 75% of all trips in Outer London to be made on foot, by cycle or using public transport should be provided.</p> <p>Construction Logistics A draft Construction Logistics Plan (CLP) forms part of the TA. The applicant has committed to scheduling all construction related deliveries outside of peak highway periods which is welcomed. However, further details are needed on measures to ensure safety, including maintaining safe cycling and walking routes throughout the construction period and an indicative figure for the number of vehicle trips associated with each construction phase should be provided. The applicant should commit to using FORS Silver or above accredited operators, as it is imperative that road safety measures are considered, and preventative measures delivered through the construction phases of the development.</p> <p>A full Construction Logistics Plan, prepared in accordance with TfL guidance should be secured by condition, in line with the Mayor's Intend to Publish London Plan policy T7.</p> <p>Deliveries and servicing An overarching outline delivery and servicing plan (DSP) has been provided, which sets out that individual units will produce their own bespoke DSPs. These should look to encourage, enable and promote sustainable and active freight, and ensure that these activities take place outside of peak times.</p>
Thames Water	<p>Waste Comments Thames Water would advise that with regard to FOUL WATER sewerage</p>

Stakeholder	Response
	<p>network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes. Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.</p> <p>Water Comments</p> <p>Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.</p>
NEIGHBOURING PROPERTIES	

Stakeholder	Response
<p>Norfolk Avenue</p>	<p>I am the owner of the property [REDACTED] Norfolk ave and its extension; the flat [REDACTED], that is most adversely affected by this proposed development. SEGRO plans to box in my property on two sides by continuous tall sheds (units 7 + 8) that will block out low winter sun that at present benefit my home and gardens. I strongly object to that. I do not want my garden to feel like a prison. i have two other serious concerns about the proposal:</p> <p>I witnessed at close hand the fire that destroyed the previous sheds that occupied the site. the flames shot tens of meters into the air and i was fearful that the fire would spread to the trees that populate the raised area of vegetation that surrounds 142 + 142a Norfolk ave. in spite of umpteen fire engines attending, they could not control the spread of fire and the entire block of contiguous sheds burnt down. it was fortunate that the wind was blowing in a favourable direction so the vegetation did not burn, because if those trees had ignited my property would surely have followed. there is a large leylandii in the vegetated buffer area that has grown to touching distance of the flat 142a. the proposed layout repeats the same design flaw of the previous warehouses: contiguous sheds with no firebreaks between them. only the canteen/reception block and electrical substation survived the fire</p> <p>because they were separated by a reasonable distance from the other structures. panels on a steel frame will not contain a big fire. the Segro design presents a significant fire risk to my property and other neighbours. SEGRO is also reducing the gap between the industrial sheds and the strip of flammable vegetation to about 4m when it was previously over 10m. this is DANGEROUS. it also means that there is no room for a fire engine to get behind the sheds. the September 2017 fire is not the only nearby warehouse fire within recent years - that they are more common than you think worries me.</p> <p>Secondly. the flat 142a has sustained considerable subsidence damage having cracks up to one centimetre wide. I estimate the end of the building closest to the SEGRO boundary has sunk by 40mm relative to the far end. the cause of this was partly the hot dry summer of 2018 exacerbated by the large nearby leylandii growing on the SEGRO side of the fence. i also strongly believe that the demolition work of Clifford Devlin greatly contributed to the cracking of the flats walls. I suspect that the raised area of land covered by trees and shrubs ¿held¿ by a retaining wall is not stable. the subsidence damage has for the time being stabilised but am now extremely anxious that new construction work on the site will cause further subsidence. planting extra trees in the area close to the flat risks making things worse. if SEGRO are planning to use percussive methods to break the concrete base within 30m of my</p>

Stakeholder	Response
	<p>property they need to think again. the same applies to piling or any ground works for drainage/utilities/landscaping/etc. a proper risk assessment needs to be done because the flat is fragile and if it is so damaged that i cannot let it, then i will lose my income. if that happens i will have no choice but to take legal action.</p> <p>One other thing. mobile phone reception at the tail end of Norfolk ave is already poor. Norfolk ave is a steep hill that blocks signal to the north. SEGRO is proposing to build a 220m long by 20m high electromagnetic screen that I think will create a communications black hole. that ought to be illegal in today's world.</p>

ARCHITECT: SPARKS ASSOCIATES
 CONSULTANT: SEGRO
 THIS PLAN IS THE PROPERTY OF SPARKS ASSOCIATES AND IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF SPARKS ASSOCIATES.

APPLICATION BOUNDARY




PLANNING

1	14/03/2020	Final concept plan - 01/04/2020	105
2	14/03/2020	Final concept plan - 01/04/2020	105
3	14/03/2020	Final concept plan - 01/04/2020	105
4	14/03/2020	Final concept plan - 01/04/2020	105
5	14/03/2020	Final concept plan - 01/04/2020	105
6	14/03/2020	Final concept plan - 01/04/2020	105
7	14/03/2020	Final concept plan - 01/04/2020	105
8	14/03/2020	Final concept plan - 01/04/2020	105

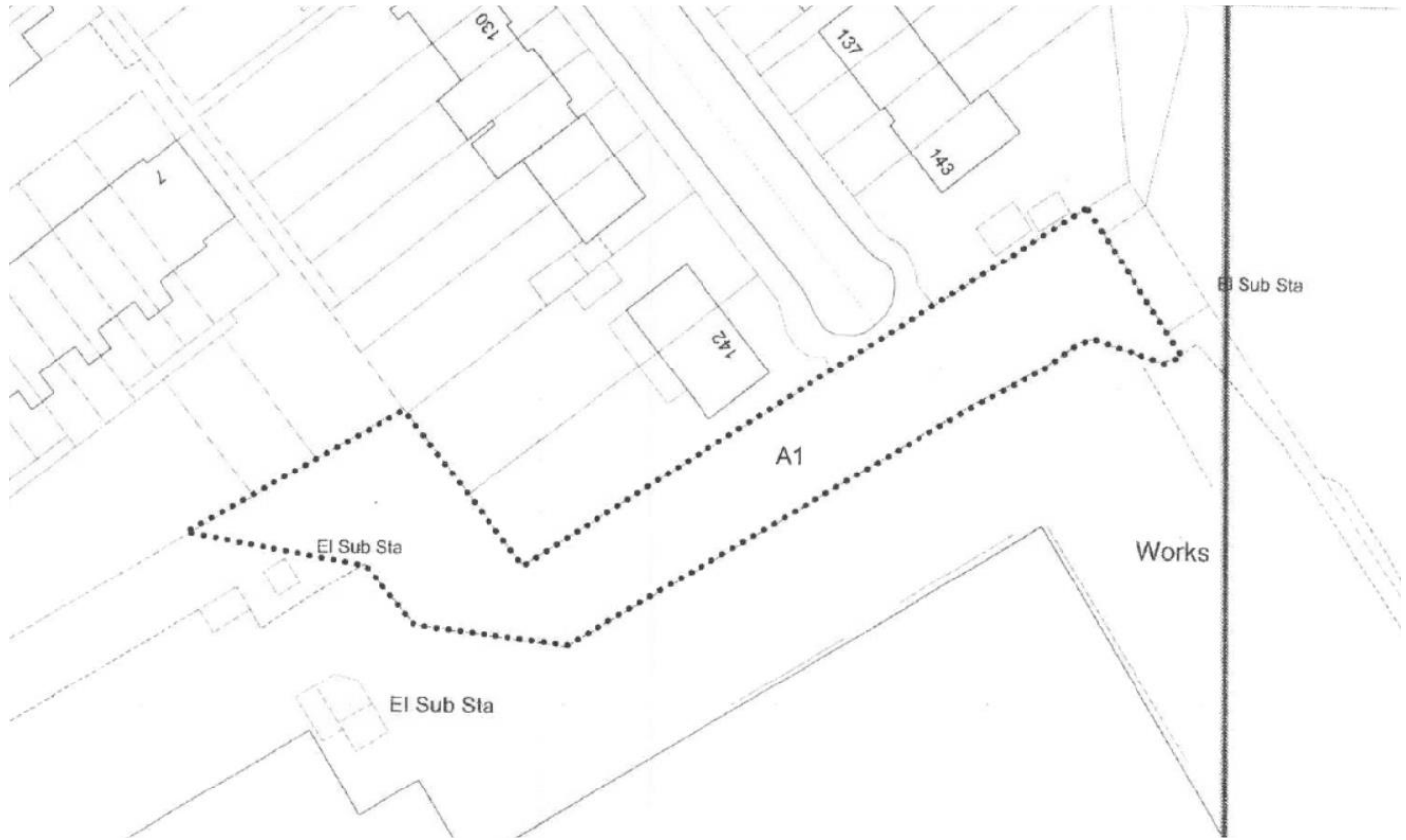


 11, RAINBOW ROAD
 TOTTENHAM, T7 6LQ
 TEL: 0181 871 1111
 WWW.SEGRO.COM

THE
 SEGRO PARK, TOTTENHAM
 SITE LAYOUT PLAN



Appendix 4 TPO Plan



Appendix 5 Full GLA Stage 1 Response

GREATER LONDON AUTHORITY

Development, Enterprise and Environment

Laurence Ackrill
Haringey Council
Civic Centre
255 High Rd
Wood Green
London N22 8LE

Our ref: GLA/5362/01/VC
Your ref: HGY/2020/0635
Date: 20 April 2020

Dear Laurence,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
555 White Hart Lane N17 7RP
Local Planning Authority Reference: HGY/2020/0635**

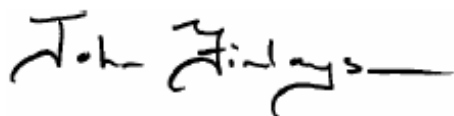
I refer to the copy of the above planning application, which was received from you on 20 March 2020. On 20 April 2020, Jules Pipe, Deputy Mayor for Planning, Regeneration, and Skills, considered a report on this proposal, reference GLA/5362/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not fully comply with the London Plan and the Mayor's intend to publish London Plan for the reasons set out in paragraph 50 of the above-mentioned report; however, the resolution of those issues could lead to the application becoming compliant with the London Plan and the Mayor's intend to publish London Plan.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Jack Kinder, email v_JackKinder@tfl.gov.uk, telephone 020 7027 9010.

Yours sincerely,

A handwritten signature in black ink, appearing to read "John Finlayson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John Finlayson
Head of Development Management

cc Joanne McCartney, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL
Stuart Mills, Icen Projects

555 White Hart Lane, Tottenham

in the London Borough of Haringey

planning application no. HGY/2020/0635

<p>Strategic planning application stage 1 referral</p> <p>Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.</p>
<p>The proposal</p> <p>Demolition of existing structures and construction of two buildings to provide eight units for light industrial (Use Class B1(c)); industrial (Use Class B2); and/or storage and distribution (Use Class B8) purposes, with ancillary offices and associated landscaping, car parking, servicing and access arrangements.</p>
<p>The applicant</p> <p>The applicant is SEGRO PLC and the architect is Michael Sparks Associates.</p>
<p>Strategic issues summary</p> <p>Principle of development: The principle of providing an increase of industrial floorspace on a Locally Significant Industrial Site is strongly supported.</p> <p>Urban design: The proposal's design and layout are supported, as they would support the industrial use whilst responding sensitively to the neighbouring residential properties. A fire statement must be submitted in accordance with Policy D12 of the Mayor's Intend to Publish London Plan.</p> <p>Environment: Additional technical information and mitigation should be provided, including a revised air quality assessment.</p> <p>Transport: The applicant should make improvements to White Hart Lane in line with the Healthy Streets Approach. Contributions are requested towards safety improvements scheme and bus stop upgrades. The provision of a right hand turn at the site's access from White Hart Lane, as well as the level of HGV parking provision, should be further discussed. Appropriate conditions and planning agreements should be secured.</p>
<p>Recommendation</p> <p>That Haringey Council be advised that the application does not yet comply with the London Plan and the Mayor's Intend to Publish London Plan for the reasons set out in paragraph 50 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan and the Mayor's Intend to Publish London Plan.</p>

Context

1 On 20 March 2020 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1B 1.(c) of the Schedule to the Order 2008:

"Development which comprises or includes the erection of a building - outside Central London and with a total floorspace of more than 15,000 square metres"

3 Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The application site, which measures approximately 3.2 hectares, is located on land formerly occupied by self-storage buildings, which were destroyed by a fire in 2017 and were subsequently demolished. The site is a Locally Significant Industrial Site (LSIS) and is accessed from White Hart Lane. The site is also surrounded by neighbouring industrial estates developed in 2015, occupied by trade centre type businesses such as Selco and Screwfix.

6 The application site is within 'Sites of Importance for Nature Conservation, local importance' and the surrounding context is housing in the north and Metropolitan Open Land in the west. The site does not contain any listed buildings and is not located within a conservation area.

7 The site is located on the north-west side of White Hart Lane, part of the borough highway network. The nearest section of the Transport for London Road Network (TLRN) is the A10 Great Cambridge Road, 500 metres east of the site. There are no rail station services within reasonable walking distance of the site with White Hart Lane station (London Overground) located approximately 1.7 kilometres east of the site and Wood Green station (London Underground) approximately 1.5 kilometres to the southwest. They are, however, linked by bus route W3 which stops close to the site frontage. Five further bus routes are available from Great Cambridge Road. As a result, the site has a public transport accessibility level (PTAL) ranging from 0 to 1b, which indicates a very poor level of accessibility.

Details of the proposal

8 The proposal is for demolition of all existing structures and erection of two buildings to accommodate eight units for light industrial (Use Class B1(c)), industrial (Use Class B2) and/or storage & distribution (Use Class B8) purposes; with ancillary offices and associated landscaping, car parking, servicing and access arrangements.

Case history

9 An initial pre-application meeting was held on 15 January with GLA officers. Following a presentation of the scheme from the applicant team, the discussion covered strategic issues

with respect to the principle of development, urban design, environment and transport. A formal advice note was issued on 30 January 2020, which concluded that the principle of redevelopment of the site for industrial/office use within a locally significant industrial site was supported in strategic planning terms.

Strategic planning issues and relevant policies and guidance

10 The relevant strategic issues and corresponding policies are as follows:

- Industrial land *London Plan; Mayor's Intend to Publish London Plan;*
- Urban design *London Plan; Mayor's Intend to Publish London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG, Shaping Neighbourhoods: Play and Informal Recreation SPG; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Mayor's Intend to Publish London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;*
- Transport *London Plan; Mayor's Intend to Publish London Plan; the Mayor's Transport Strategy;*

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the 2013 Haringey's Local Plan: Strategic Policies (with subsequent alterations adopted on the 24 July 2017); and the London Plan 2016 (Consolidated with Alterations since 2011).

12 The following are relevant material considerations:

- The National Planning Policy Framework;
- National Planning Practice Guidance;
- Mayor's Intend to Publish London Plan (December 2019), which should be taken into account on the basis set out in the NPPF.

13 On 13 March 2020, the Secretary of State issued a set of Directions under Section 337 of the Greater London Authority Act 1999 (as amended) and, to the extent that they are relevant to this particular application, these have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation.

Principle of development

14 London Plan Policy 4.4 states that the Mayor will work with boroughs and other partners to adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London. In a similar way, the Mayor's intend to publish London Plan policy E4 states that sufficient supply of land and premises should be provided and maintained in different parts of London to meet current and future demands for industrial and related functions.

15 The proposal would provide an increase of industrial floorspace on a Locally Significant Industrial Site, by constructing eight high-quality industrial units comprising a range of flexible sizes of (B1(c) / B2 and B8) uses and totalling a floor space of 17,263 sqm. This is strongly supported, as it would contribute to the stock of industrial land in London and comply with the London Plan and the Mayor's intend to publish London Plan.

Urban design

16 London Plan Policies 7.1 to 7.5, together with Policies D1-D3, D7 of the Mayor's intend to publish London Plan and the Housing SPG apply to the design and layout of development and set out a range of urban design principles relating to the quality of public realm; the provision of convenient, welcoming and legible movement routes; and, the importance of designing out crime by, in particular, maximising the provision of active frontages and minimising inactive frontages.

17 The proposed general layout and massing approach is supported and sufficient care has been given to mitigating any overshadowing/privacy impacts onto neighbouring properties. The arrangement of units, entrances and yard space enable the majority of noise/air pollutants to be contained within the site, which is welcomed. In addition, it is proposed to reinstate screening that was removed by the previous owner of the site, to increase the buffer with the residential properties and provide a well landscaped area, which is also supported.

18 The extent of active frontage onto White Hart Lane is limited, but the use of high-level window openings will help to give the impression of overlooking onto the street and is an acceptable solution in this instance. An external amenity area for the occupants of the business park is proposed (to comprise an eating area, area to exercise and a bicycle maintenance facility), which is welcome. The Council should secure details to ensure that a high-quality development is delivered.

Fire safety and resilience

19 The application is not currently supported by a fire statement, which is not acceptable. In line with Policy D12 of the Mayor's intend to publish London Plan, a fire statement, which has been prepared by a suitably qualified third party assessor, must be submitted with the application. This should clearly address the requirements outlined in policy D12(B,1-6) in appropriately organised sections, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. These measures should be then secured via condition.

Inclusive design

20 London Plan Policy 7.2 and Policy D5 of the Mayor's intend to publish London Plan seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum) ensuring that developments can be entered and used safely, easily and with dignity by all; are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; and are designed to incorporate safe and dignified emergency evacuation for all building users. The proposals would take on board these principles and are therefore supported, as they would provide level access, fully accessible lifts, appropriately sized doors, disabled toilets, showers and changing facilities.

Environment

Energy

21 The applicant has followed the energy hierarchy; however, some additional information is required before the proposals can be considered compliant with London Plan Policy 5.9 and the Mayor's intend to publish London Plan Policy S12. In terms of 'be clean', The applicant should provide further details on the proposed hot water production system. With regards to the 'be green' part of the hierarchy, further information should be submitted in relation to the PV installation and on Air Source Heat Pumps. With regards to overheating,

some additional information is also needed. The detailed technical comments have been sent to the applicant and the Council. The applicant is encouraged to submit the completed excel file of the GLA's Carbon Emission Reporting spreadsheet.

Water

22 The approach to flood risk management for the proposed development complies with London Plan policy 5.12 and the Mayor's intend to publish London Plan policy SI.12.

23 The surface water drainage strategy for the proposed development generally satisfies the requirements of London Plan policy 5.13 and the Mayor's intend to publish London Plan policy SI.13.

24 The sustainability statement proposes that the development will target a minimum BREEAM rating of 'Excellent'. The proposed development would therefore meet the requirements of London Plan policy 5.15 and the Mayor's intend to publish London Plan policy SI.5 and this is supported.

Air quality

25 London Plan Policy 7.14 and Policy SI1 of the Mayor's intend to publish London Plan requires development proposals to minimise exposure to existing poor air quality and make provision to address local problems of air quality, particularly within AQMAs. Policy SI1 further states that development proposals should take an Air Quality Neutral approach and not lead to further deterioration of air quality and should not create unacceptable risk of high levels of exposure to poor air quality.

26 London Plan Policy 7.14(B) and the Mayor's intend to publish London Plan Policy SI1(B) require developments not to lead to adverse impacts on existing air quality. A revised impact assessment of the proposed development on local air quality should be submitted with the application. The applicant has also concluded that the proposed development is not air quality neutral in terms of transport emissions, and as such is not compliant with London Plan Policy 7.14B(c) and the Mayor's intend to publish London Plan Policy SI1(B-2a). The applicant should therefore propose a scheme of mitigation. More detailed comments on the submitted assessment have also been forwarded to the applicant and the Council under separate cover.

Urban greening

27 Urban greening should be embedded as a fundamental element of site and building design, in line with London Plan Policy 5.10 and Mayor's intend to publish London Plan Policies G1 and G5. Features such as street trees, green roofs, green walls, rain gardens, wild flower meadows, woodland and hedgerows should all be considered for inclusion. The applicant has calculated the Urban Greening Factor (UGF) for the proposed development as 0.24, which is below the target of 0.3 set for commercial development set by Policy G5 of the Mayor's intend to publish London Plan. The applicant is therefore encouraged to explore design features like green roofs to see if the target UGF score of 0.3 can be achieved. It is also recommended to submit a drawing showing the surface cover types and accompanying UGF calculation.

MOL and biodiversity

28 The site adjoins MOL and the New River Sports Centre, White Hart Lane Recreation Ground & Woodside Park Site of Importance for Nature Conservation (SINC). Having considered the characteristics of the scheme, GLA officers are satisfied that the proposed development would not adversely affect the MOL or the SINC, in accordance with policies

7.17 and 7.19 of the London Plan and policies G3 and G6 of the Mayor's intend to publish London Plan.

Transport

Trip Generation/Modal Split

29 Whilst the applicant's trip generation methodology is generally acceptable, TfL is of the view that it may underestimate the use of buses as a first mode (given the considerable distance to the nearest stations). TfL seeks further discussions on this, in the context of the bus stop upgrade contribution referenced in paragraph 32 below.

Healthy Streets and Vision Zero

30 An Active Travel Zone (ATZ) assessment has been undertaken with five key routes to nearby destinations including Wood Green Town Centre, White Hart Lane station and the strategic cycle network. These destinations and routes are considered appropriate, though the assessment has overlooked Swaffham Way. This is a well-used pedestrian link linking White Hart Lane to the residential area north of the site. At the pre-application stage, the developer indicated a willingness to consider funding provision for improved lighting and maintenance along this route to help address local concerns regarding safety; this should therefore be explored further with the Council.

31 Besides works adjacent to the site, the ATZ assessment also identifies the White Hart Lane / Perth Road junction as a Personal Injury Collisions (PIC) cluster. There are emerging proposals by Haringey Council to introduce traffic calming measures and improve road safety on Perth Road and highway works along White Hart Lane, and a contribution should be sought towards enhancements to enable access to the proposed development, in line with the Mayor's intend to publish London Plan policy T2.

32 In addition, a contribution towards upgrading bus stop NL is sought, capped at £12,000 depending on the scale of upgrade necessary.

Site Access and Design

33 A new vehicular and pedestrian site access is proposed to the eastern extent of the site frontage from White Hart Lane. Proposals to provide a dedicated pedestrian and cyclist access gate and two crossing points with tactile paving to facilitate safe pedestrian access at this new junction are welcomed, in line with the Mayor's Intend to Publish London Plan policy T2.

34 It is also welcomed that pedestrian footways along White Hart Lane will be reinstated at former access points to establish a continuous pedestrian footway and enable active travel.

35 A Stage 1 Road Safety Audit has been undertaken for access proposals, which suggests a number of improvements. The works proposed include providing a new pedestrian crossing point across White Hart Lane just south of the proposed site access. This is welcomed, given the expected uplift in pedestrian movements from the westbound bus stop. This provision, along with new tactile paving, realigned dropped kerbs and revised road markings, will be implemented through a S278 agreement with Haringey Council.

36 Local modelling of the new access junction has been undertaken and the results are noted. The applicant is encouraged to discuss the retention of a right hand turn further with both the Council and TfL to ensure that the performance of the bus network is not affected.

Swept path analysis has been provided to demonstrate site access and internal site movements and is considered acceptable.

37 The hard and soft landscaping proposed within the site is welcomed in line with the Mayor's Intend to Publish London Plan policy D8 with the provision of advisory cycle lanes along both sides of the internal carriageway and marked crossing points for pedestrians enhancing safety in line with the Mayor's 'Vision Zero' objective.

Highways

38 Signal junction modelling for White Hart Lane / Great Cambridge Road has also been undertaken. The worst-case sensitivity test scenarios are predicted to result in minor increases to average delay times when compared with 2024 future flows and it is considered that this development will not have a significant impact upon the strategic highway network.

Cycle Parking

39 The quantum of cycle parking exceeds the Mayor's Intend to Publish London Plan policy T5 and it is welcomed that an additional cycle amenity hub with maintenance facilities is to be provided, accessible to all site users within the public realm to the east of the site.

40 To fully comply with the London Cycling Design Standards (LCDS), at least five percent of cycle parking should be arranged with wider spacing to accommodate larger and adapted cycles. Shower and changing facilities are to be provided for staff that commute to/from the site in accordance with the Mayor's Intend to Publish London Plan policy T5 requirements.

Car Parking

41 Car parking proposed, including blue badge and electric and ultra-low emission vehicle provision, complies with the Mayor's Intend to Publish London Plan policy T6 standards, which is welcomed. However, the provision of 18 spaces for HGVS is considered excessive, when comparable trip generation assessments indicate that a maximum of 6 HGVS would be expected to be on site at any one time. Further justification for this level of provision should be provided.

42 A Parking Design and Management Plan has been produced and the promotion of car sharing for staff movements is welcomed, which should be secured by condition.

Travel Planning

43 A framework travel plan has been produced to support this application. Whilst it is noted that individual tenants will implement their own travel plans with specific targets for their workforce, an overarching five-year site mode split target, reflecting the Mayor's strategic target for 75% of all trips in Outer London to be made on foot, by cycle or using public transport should be provided.

Construction Logistics

44 A draft Construction Logistics Plan (CLP) forms part of the TA. The applicant has committed to scheduling all construction related deliveries outside of peak highway periods which is welcomed. However, further details are needed on measures to ensure safety, including maintaining safe cycling and walking routes throughout the construction period and an indicative figure for the number of vehicle trips associated with each construction phase should be provided. The applicant should commit to using FORS Silver or above accredited

operators, as it is imperative that road safety measures are considered, and preventative measures delivered through the construction phases of the development.

45 A full Construction Logistics Plan, prepared in accordance with TfL guidance should be secured by condition, in line with the Mayor's Intend to Publish London Plan policy T7.

Deliveries and servicing

46 An overarching outline delivery and servicing plan (DSP) has been provided, which sets out that individual units will produce their own bespoke DSPs. These should look to encourage, enable and promote sustainable and active freight, and ensure that these activities take place outside of peak times.

Local planning authority's position

47 Haringey Council planning officers are assessing the application and a committee date has not yet been established.

Legal considerations

48 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (the next bit is optional) and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

49 There are no financial considerations at this stage.

Conclusion

50 The policies on principle of development (industrial land), urban design, environment and transport of the London Plan and the Mayor's intend to publish London Plan are relevant to this application. The application does not currently comply with the London Plan and the Mayor's intend to publish London Plan, however, the following changes might lead to the application becoming compliant:

- **Principle of development:** The principle of providing an increase of industrial floorspace on a Locally Significant Industrial Site is strongly supported.
- **Urban design:** The proposal's design and layout are supported, as they would support the industrial use whilst responding sensitively to the neighbouring residential properties. A fire statement must be submitted in accordance with Policy D12 of the Mayor's Intend to Publish London Plan.
- **Environment:** Additional technical information and mitigation should be provided, including a revised air quality assessment.

- **Transport:** The applicant should make improvements to White Hart Lane in line with the Healthy Streets Approach. Contributions are requested towards safety improvements scheme and bus stop upgrades. The provision of a right hand turn at the site's access from White Hart Lane, as well as the level of HGV parking provision, should be further discussed. Appropriate conditions and planning agreements should be secured.