

## **REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE**

### **1. APPLICATION DETAILS**

**Reference No:** HGY/2022/0081

**Ward:** Northumberland Park

**Address:** 15-19 Garman Road N17 0UR

**Proposal:** Demolition of the existing industrial buildings and redevelopment to provide a new building for manufacturing, warehouse or distribution with ancillary offices on ground, first and second floor frontage together with 10 No. self-contained design studio offices on the third floor. (Full Planning Application)

**Applicant:** Mr Ross Inanc

**Ownership:** Private

**Case Officer Contact:** Kwaku Bossman-Gyamera

**Site Visit Date:** 1st June 2022

**Date received:** 17/01/2022

**Last amended date:** N/A

- 1.1 The application is being reported to the Planning Committee as it is for a major commercial development of over 1,000 sqm.

### **1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- There is strong policy support for employment space within a site designated strategic Industrial Site;
- The proposed scale and design of the development is appropriate within the context of the site and would be of good quality and have a positive impact on the visual appearance of the area;
- There would be no material adverse impacts on the amenity of surrounding residents;
- The development would provide a 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;
- Further sustainability measures are secured via conditions and a Carbon Offset contribution;

## **2. RECOMMENDATION**

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management 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.
- 2.2 That delegated authority be granted to the Head of Development Management or the Assistant Director of Planning, Building Standards and Sustainability 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 Chair (or in their absence the Vice-Chair) 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 16/06/2022 or within such extended time as the Head of Development Management or the Assistant Director of Planning, Building Standards and Sustainability shall in 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) Land contamination
- 4) Unexpected contamination
- 5) NRMM
- 6) Waste and recycling
- 7) Restrictive in use classes
- 8) Parking Design and management plan
- 9) External lighting
- 10) Secure by design
- 11) Energy Strategy
- 12) Future DEN Connection
- 13) Overheating (office spaces)
- 14) BREEAM Certificate
- 15) Living Roofs
- 16) Cycle parking Design and Layout
- 17) Drainage

- 18) Materials
- 19) Noise
- 20) CMP
- 21) Servicing and delivery plan

### **Informatives**

- 1) Co-operation
- 2) CIL liable
- 3) Hours of construction
- 4) Party Wall Act
- 5) Hours of construction
- 6) Fire Brigade
- 7) Thames Water
- 8) Thames Water
- 9) Signage
- 10) Asbestos

### **Section 106 Heads of Terms:**

1. Section 278 Highways works for crossover relocation and contribution of £4,000.00 toward the amendment of traffic management order;
  2. Carbon offsetting contribution of £76,950; and
  3. Section 106 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 secure amendments to the traffic management order, by reason of its lack of measures to ensure 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 Policies SP7 of the Local Plan 2017 and Policy DM13 of the Development Management Development Plan Document 2017.*
  2. *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 SI2 and SI 4 of Planning Sub-Committee Report the London Plan 2021, Local Plan 2017 Policy SP4 and Policy DM21 of the Development Management Development Plan Document 2017.*

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.

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### **3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS**

#### **3.1 Proposed development**

- 3.1.1. This is an application for the demolition of the existing industrial buildings and redevelopment to provide a new building for manufacturing, warehouse and distribution uses with ancillary offices on the ground, first and second floor frontage together with 10 self-contained design studio offices on the third-floor level.
- 3.1.2. The existing site comprises a mix of industrial and storage and distribution units measuring approximately 1,692sqm with access from Garman Road.
- 3.1.3. The proposal seeks demolition of the existing buildings and the construction of a new building measuring approximately 3,197sqm for a range of storage, distribution and general industrial uses (Use Class B2/B8) along with ancillary offices). The proposal includes on-site car parking for 4 cars, with associated cycle parking and refuse stores facilities.

#### **3.2 Site and Surroundings**

- 3.1.4. The site is located in the Garman Road Industrial Area and covers an area of 1,692 sqm with access taken from Garman Road. There is currently no onsite parking, with two vehicular crossovers onto Garman Road which allow loading to take place.
- 3.1.5. To the south-east lies Unit 15-19 which abuts the A1055/Watermead Way. To the north, south and west are other warehouse buildings. An application has also been resolved to grant permission for the part of the site immediately to the north (unit 7 Unicorn Works 21-25 Garman Road Reference: HGY/2020/3186).
- 3.1.6. The site is designated as Strategic Industrial Land and within Flood Zone 2. The adjacent land to the east is within the Lea Valley Regional Park and designated as a SINC Grade I land. The site lies within the Tottenham Area Action Plan and is within an Archaeological Priority Area.

#### **3.4 Relevant Planning and Enforcement history**

##### 15-19 Garman Road

- 3.1.1. HGY/2021/2851 - Demolition of the existing industrial buildings and redevelopment to provide a new building for manufacturing, warehouse or distribution with ancillary offices on ground, first and second floor frontage together with 10No. Self-contained design studio offices on the third floor. (Outline Planning Application). This application has been withdrawn following officers advice.  
27-31 Garman Road

- 3.1.1. HGY/2021/2248 - Erection of two replacement B1/B2/B8 units following fire damage and demolition of the original units (Amended drawings). This decision is pending

## **4. CONSULTATION RESPONSE**

### **4.1 Application Consultation**

### **4.2 The following were consulted regarding the application:**

#### **Internal:**

- 1) LBH Transport: No objection subject to obligations and conditions to secure section 278 for road works and Construction Management Plan.
- 2) LBH Carbon Management: No objection, subject to
  - A carbon offsetting sum has been agreed at £76,950
  - Energy and sustainability plan are agreed by condition prior to implementation.
- 3) LBH Cleansing: No objections to conditions
- 4) LBH Drainage: No objection subject to condition
- 5) LHB Pollution: No objection, subject to conditions.
- 6) LBH Building Control: No objection.
- 7) LBH Employment and Skills: No comments to date
- 8) LBH Economic Regeneration: No comments to date

#### **External:**

- 9) Thames Water: No objections, subject to informative/s regarding sequential approach, sewers, groundwater discharge etc.

## **5. LOCAL REPRESENTATIONS**

### **5.1 The following were consulted:**

37 Neighbouring properties

1 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

5.3 Cllr Bevan: submitted the following comments:

- Development to comply with standard requirement and building regulation;
- Mowlem Estate on Leaside Road N17 0QJ, which was recently built to a very high standard in many aspects. This development should achieve the same standard including the green fencing
- Request that the site comes forward in uniformity of design and materials with others nearby in the interest of visual amenity.

## **6 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 appearance
4. Parking and highway safety
5. Energy and Climate Change
6. Flood risk and drainage
7. Waste and recycling
8. Air quality and Land contamination
9. Employment and Training

### **6.2 Principle of the development**

6.2.1 The site is identified as designated Strategic Industrial Land (DEA2) (SIL) which safeguards the land for a range of industrial uses – Classes ranging from (B1 (now class E(g)), B2 and B8).

6.2.2 The London Plan Policy (2021) E5 states that development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis.

6.2.3 The London Plan (2021) Policies E4 and E5 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.

6.2.4 Strategic Policy SP8 of the 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 23,800sqm 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.

6.2.5 In addition, the Council will also:

- Support local employment and regeneration aims;
- Support environment 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.

6.2.6 The application site is within the North East Industrial Estate which is part of a Strategic Industrial Location (SIL). The application would re-provide and increase the industrial floorspace on site. The proposed net increase in internal floorspace would be approx. 2,711sqm based on the information submitted in the application form. Therefore, the site would provide enhanced employment use and economic benefits particularly in terms providing for a more intensive use and securing a

modern, viable use of the site. The proposal has been designed to meet the needs of various types and sizes of occupiers and will secure the redevelopment of this site and contribute to the delivery of good quality employment floorspace in Haringey. This is supported by policy E6 of the London Plan.

#### Adjoining SINC and LVRP

- 6.2.7 The site is adjacent to designated SINC and the Lee Valley Regional Park areas. The height and scale of the proposed building would not be significantly larger than the proposal on adjoining site, which is resolved to grant permission and the nature of the business would remain within the same use classes. As such it is not considered to significantly impact these areas.

### **6.3 Impact on the amenity of adjoining occupiers**

- 6.3.1 The London Plan (2021) Policy D4 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.
- 6.3.2 The nearest residential property is some 200 metres from the site. The use of the site would not change from that of the previous use of the site and will be wholly compatible with the Strategic Industrial Land designation of the site. First floor / upper level windows are shown in the building - on the front and side elevations, but these are for providing natural daylight to the main warehouse works space rather than for outlook. Windows would also be inserted into the roof. Regardless, this is an industrial site and given the significant distance of the nearest residential properties from the site, the location of the windows would not give rise to any material levels of overlooking.
- 6.3.3 In terms of noise, it is not proposed to restrict the hours of operation, The previous use was not restricted. Restricting operating hours is considered unnecessary - an assessment of the existing ambient and background noise levels has been undertaken from the nearest residential properties to the north and south of the proposal and assessed against the likely levels of noise that would result from a development of this type and scale.

- 6.3.4 The assessment shows that the impact from operations on the site, when assessed against national guidance and existing noise levels, could operate without restrictions on operating hours. The site being on an industrial estate, any potential noise would blend into existing ambient noise of the area and as such, the development itself would not generate noticeable unacceptable level of noise and disturbance in the area.
- 6.3.5 A condition is recommended to be imposed on any grant of planning permission so to ensure that any noise from proposed plants or equipment to be used in association with the use of the site would not result in any material noise levels or nuisance to any neighbouring occupiers in line with statutory guidelines.

## **6.4 Design and appearance**

- 6.4.1 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.
- 6.4.2 The proposal would replace the existing industrial unit in its entirety and cover the extent of its full footprint. Given that this is consistent with the existing situation in terms of plot occupation, this is considered acceptable. The existing built form of the locality is fairly dense and there are tight relationships between buildings. The relationship with the buildings to the immediate north and south would maintain the existing gap, used for access, which accords with the established grain and pattern of development found locally.
- 6.4.3 The proposed replacement building would be the height of a 4-storey building whereas the existing building is a maximum of 2 storey high and most surrounding buildings are of a similar height, whilst the proposed building would rise above the current context there are higher buildings proposed and approved (planning Ref: HGY/2020/3186 further to the north and south and the proposal would be of a similar height to this proposal. Given the proposal would not be the highest on the estate, it would not detract from the character and appearance of the surrounds.
- 6.4.4 The proposed external materials of the building would be clad in metal cladding reflecting the more modern warehouses in the surrounding area and the colour

scheme would blend within the mix of colours, also observed on different buildings. The western elevation which would form the principal elevation along Garman Road reflects commercial nature of the proposal but has been designed to ensure that the fenestration 'breaks up' the elevation to provide an appropriate design along this frontage.

- 6.4.5 Overall, it is considered that the proposal would be a general improvement to the character of the space and the appearance of the area as well as, maintaining an appropriate industrial built form in keeping with the aesthetics of the locality.

## **6.5 Parking and highway safety**

- 6.5.1 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'.
- 6.5.2 It is proposed to merge the two existing vehicle crossovers and accesses to form a singular access point which will provide access into a forecourt parking area comprising 4 car parking spaces and a loading. The proposed highways works would be covered by a Section 278 legal agreement.
- 6.5.3 An additional access is provided to the rear of the proposed building via the industrial estate to the south, and the vehicle swept path analysis how this would operate.
- 6.5.4 The submitted transport statement states that in terms of travel to and from the site, most employees will travel to work by public transport or cycle. However, as this is a major development, a travel plan is proposed to be secured via a S106 legal agreement.
- 6.5.5 Cycle parking and storage provision for 16 bicycles are proposed and are located within the units. Details of the secure and sheltered provision are to be secured by condition.
- 6.5.6 A construction management plan and service and delivery plan, for approval prior to implementation of the development, will be secured by a condition. Accordingly, the proposal is considered acceptable in transport terms and provides an improvement for better pedestrian and cycle access.

## **6.6 Energy and Climate Change**

- 6.7 The NPPF and London Plan Policies 5.1, 5.2, 5.3, 5.7, 5.8, 5.9, 5.10 and 5.11, and Local Plan Policy SP4 sets out the approach to climate change and requires

developments 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 new homes to achieve a zero-carbon target beyond Part L 2013 of the Building Regulations.

6.8 The London Plan also sets a target of 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. Where an identified future decentralised energy network exists in close proximity to a site it will be expected that the site is designed so that it can easily be connected to the future network when it is delivered.

6.9 New development is expected to achieve the necessary energy and CO2 requirements within the London Plan and Haringey Council's Local Plan on site and pay an offset payment for the remainder. The applicant has submitted Sustainability and Energy Statements, including the following measures:

- Compliance with building regulations such as thermal bridging reduction
- Photo voltaic systems
- CHP
- Ground and Air Source heating

6.10 In order to optimise carbon emission mitigation and sustainability, pre-commencement energy and sustainability plans are secured via condition. In addition, a carbon offsetting contribution has been agreed for £76,950, (and secured via legal agreement) to achieve a zero-carbon development.

#### **6.11 Urban Greening Factor**

6.12 Policy G5 of The London Plan 2021 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design. The policy states that non-residential development should meet an urban greening factor target of 0.3. Urban Greening Factor

6.13 The existing site is predominantly covered in hardstanding and therefore has an urban greening factor of zero. The application site is highly constrained with the proposed replacement building extending close to the existing site boundaries. As such, the options for urban greening on the site are limited. The development would include an extensive green roof covering on the proposed roof area. Extensive green roofs have an urban greening factor of 0.7, which is one of the highest factors available. The applicant has submitted a calculation which shows the urban greening factor for this development would be 0.3, which meets the London Plan urban greening target for non-residential development.

6.14 As such, the urban greening factor of the development is acceptable.

## **6.15 Flood Risk and Drainage**

- 6.15.1 London Plan (2021) Policy SI13 (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 drainage hierarchy.
- 6.15.2 Policy also requires drainage to be designed and implemented in ways that deliver other policy objectives, including water use efficiency and quality, biodiversity, amenity and recreation. Further guidance on implementing Policy 5.13 is provided in the Mayor's Sustainable Design and Construction SPG (2014) including the design of a suitable SUDS scheme.
- 6.15.3 The site is located within a Flood Zone 2. The DPD Policy DM24 seeks that *"All proposals for new development within Flood Zone 2 and 3a will be required to provide sufficient evidence for the Council to assess whether the requirements of the Sequential Test and Exception Test, where required, have been satisfied."* In this instance the site is previously developed and no further hardstanding is proposed. As such no flood risk assessment was considered to be required in this instance. Accordingly, a condition to secure a drainage system and its details is recommended.
- 6.15.4 The site is within a critical drainage area but the area of hardstanding does not increase. DPD Policy DM26 states that *'All proposals for new development within a Critical Drainage Area (CDA) will be required to incorporate measures to reduce the overall level of flood risk in the CDA.'* A condition is recommended in order to secure future adequate levels beyond those existing.
- 6.15.5 Comments have been provided from Thames Water relating to their utilities and ensuring sustainability from the use. These comments have been brought to the attention of the applicant and an informative attached.
- 6.15.6 Accordingly, the proposed development is considered to comply with local drainage policies.

## **6.16 Waste and Recycling**

- 6.16.1 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.

6.16.2 As this is a commercial building refuse collection would be dealt with through a private arrangement. A condition to secure details of the location and facility for waste and recycling facilities on site is recommended.

## **6.17 Air Quality and Land contamination**

### Air quality

6.17.1 London Plan Policy SI1 states that development shall minimise increased exposure to existing poor air quality, make provision to address local problems of air quality and promote sustainable design and construction.

6.13.2 The Carbon Management/ Pollution Team has been consulted and raise no objection on these grounds.

### Land contamination

6.13.3 Local Plan 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.

6.13.4 The supporting documents indicate that there is low risk to human health from potential contaminants in the made ground.

6.13.5 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 conditions on any grant of planning consent.

## **6.18 Conclusion**

6.18.1 The proposed development is acceptable given it is an adequate replacement and enhancement of industrial / employment floorspace and the mix of uses proposed would be congruent with the character of the area. Other impacts related but not limited to highways, parking and traffic are mitigated by the signed Section 106 legal agreement and conditions were appropriate. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION

## **6.15 CIL**

6.15.1 Based on the information given on the plans, the Mayoral CIL charge will be £81,197.55 (1,341sqm x £60.55 x 1) and the Haringey CIL charge will be £0 as the use is subject to a Nil Rate.

## **7.0 RECOMMENDATIONS**

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



## Appendix 1- Condition and Informatives

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 development hereby authorised shall be carried out in accordance with the following approved plans and specifications: N17\_15-19GR\_BP01; N17\_15-19GR\_LP01; N17\_15-19GR\_EX01; N17\_15-19GR\_EX02; N17\_15-19GR\_PP01A; N17\_15-19GR\_PP01B; N17\_15-19GR\_PP02A; N17\_15-19GR\_PP03A; N17\_15-19GR\_PP04A; N17\_15-19GR\_PP05A; N17\_15-19GR\_SP01; Energy & Sustainability Statement dated 6th September 2021; Appendix A (BRUKL Output Document); Appendix B (BRUKL Output Document); Appendix C (BRUKL Output Document); Appendix D ('Be Clean); Appendix D ('Be Green); Appendix D ('Be Lean); Appendix D (GLA Summary tables); BREEAM NC 2018 Pre-assessment dated 3rd September 2021; Design And Access Statement -January 2022, Part 2; Part 3; Part 4; Part 5; Part 6; HOL PROPERTIES (Studio Garman Development Plans); Transport Statement (HOL Properties (UK) Limited January 2022;). 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 avoid doubt and in the interests of good planning.

Land Contamination

3. 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.

#### Unexpected contamination

4. 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.

#### NRMM

5. 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 IIIB of EU Directive 97/68/ EC for both NO<sub>x</sub> 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.

#### Waste and recycling

6. 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.

#### Restriction of use

7. 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 Office/Light Industrial E(g)); 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

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

#### Parking Management Plan

8. Before the site is occupied the applicant shall submit a Parking Management Plan detailing how the on-site car parking spaces and proposed operational parking would work on a daily basis, especially the interaction between the cars parked on site and the delivery and servicing vehicles entering the building or parking just outside of the site.

Reason: In order to reduce potential congestion on the highways network and to ensure that the car parking spaces are available for the proposed use.

#### External lighting

9. 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.

Secure by design accreditation

10. 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.

Energy Strategy

11. The development hereby approved shall be constructed in accordance with the Energy and Sustainability Statement prepared by eb7 (dated 30th May 2022 v2) delivering a minimum 60% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, VRF air source heat pumps (ASHPs) and a minimum 36.3 kWp solar photovoltaic (PV) array.

(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:

- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;
- Confirmation of the necessary fabric efficiencies to achieve a minimum 44% reduction in SAP2012 carbon factors, including details to reduce thermal bridging;
- Location, specification and efficiency of the proposed heating, ventilation and hot water system that will be compatible with the DEN in the future, with plans showing the pipework and plant location;
- Details of the PV, demonstrating the roof area has been maximised, with the following details: 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);
- A metering strategy.

The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.

(b) Within six months of first occupation, evidence that the solar PV installation has been installed correctly shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, and a six-month energy generation statement, and a Microgeneration Certification Scheme certificate.

(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.

#### Future DEN Connection

12. Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:
- Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.
  - A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;
  - Plans and sections showing the pipe route from an agreed connection point in an adjacent road (where the DEN connection is expected to be made) to the plant room. The pipework route shall be coordinated with existing and services from the agreed connection to the plant room;
  - Detail of the pipe design, pipe sizes (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion.
  - Plans and sections showing the route for three 100mm diameter communications ducts from an agreed connection point in an adjacent road (where the DEN connection is expected to be made) to the plant room. The

duct route shall be coordinated with existing and services from the agreed connection to the plant room;

- Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;
- Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;
- Details of a future pipework route from the temporary plant location to the plant room

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.

#### Overheating (office spaces)

13. Prior to the commencement of development, an overheating model and report shall be submitted to and approved by the Local Planning Authority. The model will assess the overheating risk in line with CIBSE TM52 (using the London Weather Centre TM49 weather DSY1-3 files for the 2020s, and DSY1 for the 2050s) and demonstrate how the overheating risks have been mitigated and removed through design solutions. These mitigation measures shall be operational prior to the first occupation of the development hereby approved and retained thereafter for the lifetime of the development. Air conditioning will not be supported unless exceptional justification is given.

This report will include:

- Details of the design measures incorporated within the scheme in line with the Cooling Hierarchy (including details of the feasibility of prioritising passive cooling and ventilation measures) to ensure adaptation to higher temperatures are addressed, the spaces do not overheat, and the use of active cooling is avoided.
- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.
- A retrofit plan to mitigate the future risks of overheating by setting out how the future mitigation measures are shown to help pass future weather files and confirming that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment) and include any replacement / repair cycles and the annual running costs for the occupiers;
- Annotated floorplans showing which office spaces have been modelled. The report should model a top floor single-aspect south-facing office, a south-west and south-east facing office space.

Reason: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.

#### BREEAM Certificate

14. (a) Prior to commencement on site, a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Excellent” outcome (or equivalent). This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.

The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.

(b) At least six months prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.

In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority’s approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.

#### Living Roofs

15. (a) Prior to the commencement of development, details of the living roof must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:
  - i) A roof plan identifying where the living roofs will be located;

- ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm);
- iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate
- iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m<sup>2</sup> of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m<sup>2</sup>, rope coils, pebble mounds of water trays;
- v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m<sup>2</sup>) and density of plug plants planted (minimum 20/m<sup>2</sup> with roof ball of plugs 25m<sup>3</sup>) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);
- vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and
- vii) Management and maintenance plan, including frequency of watering arrangements.

(b) Prior to the occupation of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roof has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development 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 (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

#### Cycle Parking

16. No development shall take place until scaled drawings with details of the location and dimensions of secure and covered cycle parking facilities have been submitted to and approved in writing by the Local Planning Authority. The proposed development shall not be occupied until 6 long-stay and 3 short-stay cycle parking spaces for the employees and visitors of the proposed development have been installed in accordance with the approved details and the London Cycling Design Standards. Such spaces shall be retained thereafter for this use only.



Reason: To promote travel by sustainable modes of transport and to comply with the London Plan (2021) minimum cycle parking standards and the London Cycle Design Standards.

#### Drainage

17. Prior to commencement of development on site a plan for sustainable drainage and improvements for the flood risk of the area and safe disposal and sustainable use of water on site. The development shall be provided as approved and retained as such thereafter.

Reason: To ensure the critical drainage and flood risk is improved in accordance with policies DM26 and DM27 of the DPD (2017).

#### Materials

18. Samples of materials to be used for the external surfaces hardstanding, gates and fencing, 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, cladding, window frames and a roofing material sample combined with a schedule of the exact product references. The development shall be provided as approved and retained as such thereafter.

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.

#### Noise

19. The design and installation of new items of fixed plant hereby approved by this permission shall be such that, when in operation, the cumulative noise level LAeq 15 min arising from the proposed plant, measured or predicted at 1m from the facade of nearest residential premises shall be a rating level of at least 5dB(A) below the background noise level LAF90. The measurement and/or prediction of the noise should be carried out in accordance with the methodology contained within BS 4142: 1997. Upon request by the local planning authority a noise report shall be produced by a competent person and shall be submitted to and approved by the local planning authority to demonstrate compliance with the above criteria.

Reason: In order to protect the amenities of nearby residential occupiers consistent with Policy D14 of the London Plan 2021 and Policies DM1 and DM23 of The Development Management DPD 2017.

20. Construction Management Plan (including Construction Logistics Plan)
- Prior to the commencement of development, a Construction Management Plan (including a Construction Logistics Plan) shall be submitted to and approved in writing by the Local Planning Authority. The document shall include the following matters and the development shall be undertaken in accordance with the details as approved:
- a) The routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway;
  - b) The estimated peak number and type of vehicles per day and week;
  - c) Estimates for the number and type of parking suspensions that will be required; and
  - d) Details of measures to protect pedestrians and other highway users from construction activities on the highway.

Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development, encouraging modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect of the amenity of neighbour properties and to main traffic safety.

#### Delivery and Servicing Plan

21. Prior to the commencement of development, a Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority. The document shall include the following matters:
- a) Identifying where safe and legal loading and unloading can take place;
  - b) Ensuring delivery activities do not hinder the flow of traffic on the public highway;
  - c) Managing deliveries to reduce the number of trips, particularly during peak hours;
  - d) Minimising vehicles waiting or parking at loading areas so that there would be a continuous availability for approaching vehicles; and
  - e) Using delivery companies who can demonstrate their commitment to best practice through the Fleet Operator Recognition Scheme (FORS).

Reason: To set out the proposed delivery and servicing strategy for the development, including the predicted impact of the development upon the local highway network and both physical infrastructure and day-to-day policy and management mitigation measures. To ensure that delivery and servicing activities are adequately managed such that the local community, the pedestrian, cycle and highway networks and other highway users experience minimal

disruption and disturbance. To enable safe, clean and efficient deliveries and servicing.

**Informatives:**

**INFORMATIVE :** In dealing with this application, Haringey Council has implemented the requirements of the National Planning Policy Framework and of the Town and Country Planning (Development Management Procedure) (England) (Amendment No.2) Order 2012 to foster the delivery of sustainable development in a positive and proactive manner.

**INFORMATIVE : CIL**

Based on the information given on the plans, the Mayoral CIL charge will be £80,941.76 (1,341sqm x £60.36) but there will be no Haringey CIL charge as this would not be within the chargeable use classes. 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.

**INFORMATIVE :**

In this instance it is noteworthy that the development would be in place of floorspace that had previously existed on site, albeit not being demolished and re-provided as part of this application. An informative will advise that the applicant may wish to investigate applying for CIL exemption prior to commencement of development.

**INFORMATIVE :**

In dealing with this application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our pre-application advice service and published development plan, comprising the London Plan 2021, the Haringey Local Plan 2017 along with relevant SPD/SPG documents, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

**INFORMATIVE: Land Ownership**

The applicant is advised that this planning permission does not convey the right to enter onto or build on land not within his ownership.

#### INFORMATIVE: Party Wall Act

The applicant's attention is drawn to the Party Wall Act 1996 which sets out requirements for notice to be given to relevant adjoining owners of intended works on a shared wall, on a boundary or if excavations are to be carried out near a neighbouring building.

#### INFORMATIVE: Hours of Construction Work

The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours:-

8.00am - 6.00pm Monday to Friday  
8.00am - 1.00pm Saturday  
and not at all on Sundays and Bank Holidays.

#### INFORMATIVE:

The London Fire Brigade strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers, and can reduce the risk to life. The Brigade opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupier. .

#### INFORMATIVE: Thames Water

With regards to surface water drainage, it is the responsibility of a developer to make proper provision for drainage to ground, water course, or a suitable sewer. In respect of surface water, it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

#### INFORMATIVE:

The applicant is advised that extensive comments have been provided by Thames Water outlining the responsibilities of owners of the site in development (available

on the application file online). The site is within 15m of waste water assets, so developers should be aware of the guidance on working near such assets. Likewise guidance on crossing public sewers should be reviewed. A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. Petrol / oil interceptors shall be fitted in all car parking / washing / repair facilities. The applicant shall demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer during construction and operation. Surface water drainage will require a sequential approach to disposal. If using mains water for construction then Thames Water should be contacted. Signage

INFORMATIVE :

The Applicant is advised that deemed consent for any business related signage applies for signs up to 0.3sqm. Any larger signage will require advertisement consent. This is in accordance with section 2 (b) of the Town and Country Planning Act (Control of Advertisements) Regulations 2007.

INFORMATIVE :

Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.

## Appendix 1 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response												
<b>INTERNAL</b>														
<b>Transportation</b>	<p>The plans and Transport Statement provided by the applicant have been reviewed and the following comments have been made in relation to transport planning matters.</p> <p><b>1. Overview</b></p> <p>The development proposals are for the demolition of existing industrial buildings and the construction of a new building for a range of storage, distribution and general industrial uses along ancillary offices and design studio offices. It is understood that the proposals are to uplift the total Gross Internal Area (GIA) from 1,482 to 2,953sqm, as follows:</p> <table border="1"> <thead> <tr> <th></th><th>Existing GIA</th><th>Proposed GIA</th></tr> </thead> <tbody> <tr> <td>B8 – Storage and Distribution</td><td>741</td><td>1,224</td></tr> <tr> <td>B2 – General Industrial</td><td>741</td><td>1,729</td></tr> <tr> <td>Total</td><td>1,482</td><td>2,953</td></tr> </tbody> </table> <p>The proposed areas are different in the 'Proposed Drawings' document. Any discrepancies will have to be clarified. Additionally, for the purpose of the planning application, all existing and proposed floorspaces will have to be expressed as Gross External Areas (GEAs), GIAs and Net Internal Areas (NIAs).</p> <p><b>2. Car Parking and Operational Parking</b></p>		Existing GIA	Proposed GIA	B8 – Storage and Distribution	741	1,224	B2 – General Industrial	741	1,729	Total	1,482	2,953	<p>Noted – additional information has been submitted by the applicant in addressing concerns raised by the Council's Highways officer. As such the Council's Highways officers are reviewing these report. It is likely that further conditions and obligations could be imposed these will be reported through an addendum.</p>
	Existing GIA	Proposed GIA												
B8 – Storage and Distribution	741	1,224												
B2 – General Industrial	741	1,729												
Total	1,482	2,953												

Stakeholder	Question/Comment	Response
	<p>A total of 4No. car parking spaces are proposed, with charging points. The site is located in the Upper Lea Valley Opportunity Area. As such, the maximum car parking provision is up to 1 space per 600sqm GIA. Based on the proposed GIA, a maximum of 5 spaces are allowed, therefore the proposals are compliant with the London Plan (2021) standards. One of the proposed spaces would be for wheelchair users, which is welcome, however any designated bay must be enlarged (2.4m x 4.8m plus a 1.2m strip to the side and the rear for boot access).</p> <p>The application form states that the proposed car parking spaces would be fitted with passive provision. At least one space should be fitted with active provision that could be used right from the outset.</p> <p>Additionally, the proposed development would require adequate delivery and servicing parking provision. The Design and Access Statement mentions that there is a "Loading Only" on-street area provided on the Garman Road frontage beside the existing pavement." This is correct but the operational needs of the proposed development have not been assessed therefore it is not possible to say whether relying upon an existing on-street loading bay would be sufficient. In all likelihood, this would not be the case.</p> <p>As per London Plan Policy T6.2 Office Parking, "operational parking requirements should be considered on a case-by-case basis. All operational parking must provide infrastructure for electric or other Ultra-Low Emission</p>	

Stakeholder	Question/Comment	Response
	<p>vehicles”. The requirements should be reviewed based on the predicted needs of the proposed development.</p> <p>All proposed vehicle parking spaces would need to be tested by means of swept paths to demonstrate that vehicles can comfortably manoeuvre in and out between the spaces and the carriageway. It is not certain that there would be sufficient space to accommodate all proposed spaces. It should also be clarified whether delivery and servicing vehicles would actually enter the building. If so, the swept paths should also include these manoeuvres.</p> <p>A Parking Design and Management Plan may be required by planning condition, depending on the proposed parking arrangements to be clarified by the applicant.</p> <p><b>3. On-Street Parking Stress Survey</b></p> <p>We require an on-street parking stress survey of the vicinity of the site in accordance with the Lambeth methodology for commercial developments, within 500m of the site. Due to the site’s low Public Transport Accessibility Level of 2 and the absence of Controlled Parking Zone restrictions before 5pm on weekdays, it is important to understand the existing local parking pressures and how the proposed development could impact those.</p> <p><b>4. Cycle Parking</b></p> <p>A secure, covered cycle store for 16No. bicycles is proposed near the approach to the main entrance. The</p>	



Stakeholder	Question/Comment	Response
	<p>London Plan (2021) minimum car parking standards for land use classes B2-B8 require 1 long-stay space per 500sqm Gross External Area (GEA) and 1 short-stay space per 1,000sqm GEA. Although the proposed floorspace has not been expressed as GEAs, it is estimated that the proposed development should have a total of 6 long-stay and 3 short-stay spaces.</p> <p>The proposed quantum (16 spaces) exceeds the minimum requirements, however consideration should be given to relocate the long-stay cycle parking spaces into the building, in a secure area with access for employees only. Short-stay parking can be provided within the site's public realm as currently shown, near the entrance(s) to the building and as Sheffield stands.</p> <p>Both long-stay and short-stay cycle parking should be provided in line with the London Cycling Design Standards, including the minimum dimensional and spacing requirements. Lockers, showers and changing rooms with drying facilities should be considered for employees who cycle. Accessible toilet facilities for disabled cyclists should also be provided.</p> <p>Access to both long-stay and short-stay parking should avoid stairs, narrow doorways and passages of less than 1.2m in width. In the specific case of an internal cycle store, no more than two sets of doors should be passed through, with a recommended minimum external door width of 2m.</p> <p>The adequacy of the long-stay and short-stay cycle parking and access arrangements would be secured by planning</p>	

Stakeholder	Question/Comment	Response
	<p>condition. This would involve the provision of full details showing the parking systems to be used, access to them, the layout and space around the cycle parking spaces with all dimensions marked up on a plan.</p> <p><b>5. Transport Statement</b></p> <p>We require that a Transport Statement accompany the planning application and include the following:</p> <ul style="list-style-type: none"> <li>- Overview of the relevant planning policy and guidance (national, regional and local);</li> <li>- Description of the existing site and land uses;</li> <li>- Review of the local existing and future transport networks (pedestrian, cycle, public transport and highway) and on-street parking provision (including local Controlled Parking Zone arrangements);</li> <li>- Description of the development proposals, including proposed land use quantum, cycle parking, car parking and vehicular, cycle and pedestrian access arrangements;</li> <li>- Description of the proposed delivery, servicing and waste management arrangements, and calculation of the loading bay requirements of the proposed development;</li> <li>- Analysis of the parking stress survey and establishment of the spare on-street parking occupancy; and</li> <li>- Multi-modal trip generation assessment of the existing and proposed developments, and calculation of the net impact on the local transport networks and local on-street parking capacity.</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>The waste storage and management proposals will need to be consulted upon and accord with the advice given by the LBH Waste Officer. The latter should be reflected accordingly in the Transport Statement.</p> <p><b>6. Additional Documents</b></p> <p>A Commercial Travel Plan Statement (Interim and Full documents) would be secured by Section 106 planning obligations. Both a Delivery and Servicing Plan and a Construction Management and Logistics Plan would be secured by planning conditions.</p> <p><b>7. Highway Works and Public Highway Condition</b></p> <p>The development proposals do not appear to involve any highway works, the applicant needs to confirm this would indeed be the case. If highway works were required then a Section 278 legal agreement would be necessary and a detailed plan of the works would have to be provided alongside the other planning documents.</p> <p>Finally, we would seek to add a public highway planning condition so that surveys of the existing condition of the public highway outside the site would be undertaken prior to and after redevelopment.</p>	
<b>Carbon Management</b>	<p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> <li>• Energy and Sustainability Statement prepared by eb7 (dated 30<sup>th</sup> May 2022, v2)</li> </ul>	Noted, conditions and obligation attached accordingly.

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>• Appendices to Energy Strategy, including:               <ul style="list-style-type: none"> <li>○ BRUKL Output Documents Shell and Core</li> <li>○ Be Lean, Clean and Green sheets</li> <li>○ GLA carbon emission reporting spreadsheet</li> <li>○ BREEAM New Construction 2018 Pre-Assessment report, prepared by eb7 (dated 3<sup>rd</sup> September 2021)</li> </ul> </li> <li>• Relevant supporting documents.</li> </ul> <p><b>Summary</b></p> <p>The development achieves a reduction of 60% carbon dioxide emissions on site, which is supported. Appropriate planning conditions have been recommended to ensure this development is policy compliant and delivers the appropriate benefits.</p> <p><b>Energy – Overall</b></p> <p>Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013)). The London Plan (2021) further confirms this in Policy SI2.</p> <p>The overall predicted reduction in CO<sub>2</sub> emissions for the development shows an improvement of approximately 60% in carbon emissions with SAP10 carbon factors, from the Baseline development model (which is Part L 2013 compliant). This represents an annual saving of</p>	

Stakeholder	Question/Comment	Response																								
	<p>approximately 41 tonnes of CO<sub>2</sub> from a baseline of 68 tCO<sub>2</sub>/year.</p> <p>London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are 93.4 tCO<sub>2</sub>. The overall reduction in carbon emissions when taking into account unregulated and regulated emissions is 44%.</p> <table border="1"> <thead> <tr> <th>(SAP10 emission factors)</th><th>tCO<sub>2</sub></th><th>%</th></tr> </thead> <tbody> <tr> <td><b>Baseline emissions</b></td><td>68</td><td></td></tr> <tr> <td><b>Be Lean savings</b></td><td>24</td><td>35.4%</td></tr> <tr> <td><b>Be Clean savings</b></td><td>23</td><td>0%</td></tr> <tr> <td><b>Be Green savings</b></td><td>-7</td><td>24.7%</td></tr> <tr> <td><b>Cumulative savings</b></td><td>41</td><td>60%</td></tr> <tr> <td><b>Carbon shortfall to offset (tCO<sub>2</sub>)</b></td><td>27</td><td></td></tr> <tr> <td><b>Carbon offset contribution (incl. 10% management fee)</b></td><td colspan="2">           £95 x 30 years x 27 tCO<sub>2</sub>/year            = £76,950            + 10% = £7,695 = £84,645         </td></tr> </tbody> </table> <p><b>Energy – Lean</b>  The applicant has proposed a saving of 44 tCO<sub>2</sub> in carbon emissions (44%) through improved energy efficiency standards in key elements of the build, based on SAP2012 carbon factors. This goes beyond the minimum 15% reduction set in London Plan Policy SI2, so this is supported.</p>	(SAP10 emission factors)	tCO <sub>2</sub>	%	<b>Baseline emissions</b>	68		<b>Be Lean savings</b>	24	35.4%	<b>Be Clean savings</b>	23	0%	<b>Be Green savings</b>	-7	24.7%	<b>Cumulative savings</b>	41	60%	<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	27		<b>Carbon offset contribution (incl. 10% management fee)</b>	£95 x 30 years x 27 tCO <sub>2</sub> /year = £76,950 + 10% = £7,695 = £84,645		
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<b>Baseline emissions</b>	68																									
<b>Be Lean savings</b>	24	35.4%																								
<b>Be Clean savings</b>	23	0%																								
<b>Be Green savings</b>	-7	24.7%																								
<b>Cumulative savings</b>	41	60%																								
<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	27																									
<b>Carbon offset contribution (incl. 10% management fee)</b>	£95 x 30 years x 27 tCO <sub>2</sub> /year = £76,950 + 10% = £7,695 = £84,645																									

Stakeholder	Question/Comment	Response																								
	<p>The following u-values, g-values and air tightness are proposed:</p> <table><tr><td>Floor u-value</td><td>0.12 W/m²K</td></tr><tr><td>External wall u-value</td><td>0.20 W/m²K</td></tr><tr><td>Roof u-value</td><td>0.20 W/m²K</td></tr><tr><td>Door u-value</td><td>1.50 W/m²K</td></tr><tr><td>Window u-value</td><td>1.40 W/m²K</td></tr><tr><td>G-value</td><td>0.45</td></tr><tr><td>Air permeability rate</td><td>3 m³/hm² @ 50Pa</td></tr><tr><td>Ventilation strategy</td><td>Natural ventilation for the office spaces</td></tr><tr><td>HVAC system</td><td>Low temperature hot water heating system through centralised gas boilers (94% efficient) – Be Lean only</td></tr><tr><td>Hot water</td><td>Point of use water heaters</td></tr><tr><td>Thermal bridging</td><td>Accredited Construction Details</td></tr><tr><td>Low energy lighting</td><td>100% LED lighting; PIR/presence controls for common areas and stairwells. Daylight diming for naturally lit areas</td></tr></table> <p>London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy. The report sets out what measures will reduce this overheating risk, including insulation,</p>	Floor u-value	0.12 W/m²K	External wall u-value	0.20 W/m²K	Roof u-value	0.20 W/m²K	Door u-value	1.50 W/m²K	Window u-value	1.40 W/m²K	G-value	0.45	Air permeability rate	3 m³/hm² @ 50Pa	Ventilation strategy	Natural ventilation for the office spaces	HVAC system	Low temperature hot water heating system through centralised gas boilers (94% efficient) – Be Lean only	Hot water	Point of use water heaters	Thermal bridging	Accredited Construction Details	Low energy lighting	100% LED lighting; PIR/presence controls for common areas and stairwells. Daylight diming for naturally lit areas	
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Stakeholder	Question/Comment	Response
	<p>minimal glazing on the southern elevation, low g-values, 3.5m high ceilings, slab floors offering thermal mass, natural ventilation. No active cooling is expected to be required.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> <li>- As this is a major development, a dynamic thermal modelling assessment should be submitted to demonstrate that the overheating risk in the office spaces is minimised and the cooling demand and any need for active cooling is reduced as far as possible. This will be conditioned.</li> </ul> <p>Overheating is dealt with in more detail below.</p> <p><b>Energy – Clean</b></p> <p>The site is within reasonable distance of a proposed Decentralised Energy Network (DEN) as it is just located to the south of Meridian Water, where the Energy from Waste plant will be built to supply heat to Haringey’s DENs.</p> <p>The applicant is proposing to enable a connection to the DEN in the future, when this becomes available. This will be enabled through the provision of sufficient space at ground floor level for a plant room to distribute hot water and space heating to the site, safeguarding an identified route from the plant room to the property, tees and isolation valves, and flow and return temperatures that allow for a future connection. This detail will need to be conditioned.</p> <p><b>Energy – Green</b></p>	

Stakeholder	Question/Comment	Response
	<p>As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.</p> <p>The application has reviewed the installation of various renewable technologies. The report concludes that solar photovoltaic (PV) panels and a VRF system are the most viable option to deliver the Be Green requirement. A reduction of 17 tCO<sub>2</sub> (25%) in emissions is proposed under Be Green measures.</p> <p>The solar array peak output would be 36.3 kWp, which is estimated to produce around 35,000 kWh/year of renewable electricity per year, equivalent to a reduction of 8 tCO<sub>2</sub>/year. The array of 110 panels would be mounted on the roof, facing south.</p> <p>A site-wide Variable Refrigerant Flow (VRF) system with air source heat pumps is proposed for the office spaces, to recover the solar/internal heat gains when cooling and redistribute these elsewhere. Their seasonal efficiencies are expected at 4.6 (heating), 6.7 (cooling). This type of system is not easily compatible with a DEN connection as it is not based on the circulation of hot water. VRF systems also allow for cooling, which needs to be designed out and minimised to comply with Policy SI4.</p> <p><b>Carbon Offset Contribution</b></p>	



Stakeholder	Question/Comment	Response
	<p>A carbon shortfall of 27 tCO<sub>2</sub>/year remains. The remaining carbon emissions will need to be offset at £95/tCO<sub>2</sub> over 30 years.</p> <p><b>Sustainability</b> Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques.</p> <p><b>BREEAM</b> Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.</p> <p>The applicant has prepared a BREEAM Pre-Assessment Report for the commercial units. Based on this report, a score of 70.27 % is expected to be achieved, equivalent to 'Excellent' rating. This is supported.</p> <p><b>Urban Greening Factor</b> An Urban Greening Factor calculation was submitted demonstrating a factor of 0.32 which complies with the London Plan Policy G5 interim minimum target of 0.3 for predominantly non-residential developments. However, this proposal relies on living roofs with a substrate of 80mm, which is not sufficient to guarantee that the living roof will establish properly, provide the necessary benefits and thrive. A suitable condition has been added to ensure the greening and biodiversity benefits can be delivered.</p> <p><b>Whole Life Carbon</b></p>	

Stakeholder	Question/Comment	Response
	<p>Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions. This application is not required to submit a full statement. No reference has been made to reducing whole-life carbon within the proposed development. The applicant is strongly encouraged to consider using low-carbon materials, sourced as local as possible.</p> <p><b><i>Circular Economy</i></b>  Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.</p> <p>This application is not required to submit a full statement. No reference has been made to consider and integrate circular economy principles within the proposed development. The applicant is strongly encouraged to consider implementing circular economy principles, such as designing for disassembly and reuse.</p> <p><b>Conclusion</b>  Overall, it is considered that the application <b>can be supported</b> from a carbon management and sustainability point of view.</p> <p>Proposed Planning Conditions</p>	

Stakeholder	Question/Comment	Response
	<p><u>Energy strategy</u></p> <p>The development hereby approved shall be constructed in accordance with the Energy and Sustainability Statement prepared by eb7 (dated 30<sup>th</sup> May 2022 v2) delivering a minimum 60% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, VRF air source heat pumps (ASHPs) and a minimum 36.3 kWp solar photovoltaic (PV) array.</p> <p>(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:</p> <ul style="list-style-type: none"> <li>- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;</li> <li>- Confirmation of the necessary fabric efficiencies to achieve a minimum 44% reduction in SAP2012 carbon factors, including details to reduce thermal bridging;</li> <li>- Location, specification and efficiency of the proposed heating, ventilation and hot water system that will be compatible with the DEN in the future, with plans showing the pipework and plant location;</li> <li>- Details of the PV, demonstrating the roof area has been maximised, with the following details: 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);</li> <li>- A metering strategy.</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.</p> <p>(b) Within six months of first occupation, evidence that the solar PV installation has been installed correctly shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, and a six-month energy generation statement, and a Microgeneration Certification Scheme certificate.</p> <p>(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.</p> <p>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.</p> <p><u>Future DEN Connection</u> Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:</p>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>• Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.</li> <li>• A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;</li> <li>• Plans and sections showing the pipe route from an agreed connection point in an adjacent road (where the DEN connection is expected to be made) to the plant room. The pipework route shall be coordinated with existing and services from the agreed connection to the plant room;</li> <li>• Detail of the pipe design, pipe sizes (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion.</li> <li>• Plans and sections showing the route for three 100mm diameter communications ducts from an agreed connection point in an adjacent road (where the DEN connection is expected to be made) to the plant room. The duct route shall be coordinated with existing and services from the agreed connection to the plant room;</li> <li>• Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;</li> </ul>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>• Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;</li> <li>• Details of a future pipework route from the temporary plant location to the plant room.</li> </ul> <p>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.</p> <p><u>Overheating (office spaces)</u>  Prior to the commencement of development, an overheating model and report shall be submitted to and approved by the Local Planning Authority. The model will assess the overheating risk in line with CIBSE TM52 (using the London Weather Centre TM49 weather DSY1-3 files for the 2020s, and DSY1 for the 2050s) and demonstrate how the overheating risks have been mitigated and removed through design solutions. These mitigation measures shall be operational prior to the first occupation of the development hereby approved and retained thereafter for the lifetime of the development. Air conditioning will not be supported unless exceptional justification is given.</p> <p>This report will include:</p>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- Details of the design measures incorporated within the scheme in line with the Cooling Hierarchy (including details of the feasibility of prioritising passive cooling and ventilation measures) to ensure adaptation to higher temperatures are addressed, the spaces do not overheat, and the use of active cooling is avoided.</li> <li>- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.</li> <li>- A retrofit plan to mitigate the future risks of overheating by setting out how the future mitigation measures are shown to help pass future weather files and confirming that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment) and include any replacement / repair cycles and the annual running costs for the occupiers;</li> <li>- Annotated floorplans showing which office spaces have been modelled. The report should model a top floor single-aspect south-facing office, a south-west and south-east facing office space.</li> </ul> <p>Reason: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.</p> <p><u>BREEAM Certificate</u></p>	

Stakeholder	Question/Comment	Response
	<p>(a) Prior to commencement on site, a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Excellent” outcome (or equivalent). This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.</p> <p>The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.</p> <p>(b) At least six months prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.</p> <p>In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority’s approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</p> <p>Reason: In the interest of addressing climate change and securing sustainable development in accordance with</p>	



Stakeholder	Question/Comment	Response
	<p data-bbox="426 233 1226 302">London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.</p> <p data-bbox="426 380 604 410"><u>Living Roofs</u></p> <p data-bbox="426 415 1262 704">(a) Prior to the commencement of development, details of the living roof must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:</p> <ul style="list-style-type: none"> <li data-bbox="426 709 1167 777">i) A roof plan identifying where the living roofs will be located;</li> <li data-bbox="426 782 1247 886">ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm);</li> <li data-bbox="426 891 1272 995">ii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate</li> <li data-bbox="426 1000 1262 1252">iii) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m<sup>2</sup> of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m<sup>2</sup>, rope coils, pebble mounds of water trays;</li> <li data-bbox="426 1256 1268 1398">iv) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m<sup>2</sup>) and density of plug plants planted (minimum 20/m<sup>2</sup> with roof ball of plugs 25m<sup>3</sup>) to benefit native wildlife, suitable for the amount of</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);</p> <p>v) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</p> <p>vi) Management and maintenance plan, including frequency of watering arrangements.</p> <p>(b) Prior to the occupation of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roof has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.</p> <p>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 (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</p>	
<b>Building Control</b>	<p>This department has no objection to this application. This type of work will require a Building Regulation application to be made after Planning permission has been granted.</p>	Noted.

Stakeholder	Question/Comment	Response
	<p>You may also contact Haringey Building Control for Free Application advice/meeting to discuss the scheme further in particular B5 - fire brigade Access.</p>	
<b>Pollution</b>	<p>Having considered all the submitted supportive information, please be advise that we have no objection to the development in relation to AQ and Land Contamination but planning conditions are recommend should planning permission be granted considering the site is located on an unspecified factory work of medium risk and within a close proximity of other contaminated land use sites. However, with the nature of the proposed development i.e. light industrial unit, it might be possible that a minor work will be require been a similar replacement of existing planning end use.</p>	Noted conditions attached.
<b>Waste and Street Cleansing</b>	<p>Having reviewed the documents, the only reference to waste management is contained in section 4.4 of the D&amp;A statement. Here there is reference to a location being identified on the developments frontage next to the rolleshutter where wheeled bins would be stored in a line within an enclosure allowing kerbside collections of waste and recycling to be collected, presumably from Garman Road.</p> <p>The application is light on detail in terms of the type of waste that will be generated from the development in use and the number of bins that will be required. The waste generated will be commercial waste and therefore the owners/managers of the development are free to go to the market to find registered commercial waste companies and tailor collections to their requirements. This, as well as the activities of the occupants, will influence the number of bins</p>	Noted condition 6 attached requesting details of waste storage.

Stakeholder	Question/Comment	Response
	<p>needed at this development. It would however be helpful for an indicative number to be provided.</p> <p>The wheeled bins will not be able to be stored on the public footway and therefore the proposed enclosure would need to be on the footprint of the developments frontage. Some detail on the proposed bin enclosure/screening would be helpful to ensure that it is robust in its construction and acceptable visually. Collection vehicle can access Garman Road currently and as this development has no impact on the highway or access waste from the development will be able to be collected.</p>	
<b>EXTERNAL</b>		
<b>Thames Water</b>	<p>With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.  <a href="https://developers.thameswater.co.uk/Developing-a-largesite/Apply-and-pay-for-services/Wastewater-services">https://developers.thameswater.co.uk/Developing-a-largesite/Apply-and-pay-for-services/Wastewater-services</a></p> <p>We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, and testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should</p>	Noted, informatives attached.

Stakeholder	Question/Comment	Response
	<p>the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via <a href="http://www.thameswater.co.uk">www.thameswater.co.uk</a>. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p> <p>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. <a href="https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development/Working-near-or-divertingour-pipes">https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development/Working-near-or-divertingour-pipes</a>.</p> <p>The proposed development is located within 15 metres of our underground waste water assets and as such we would</p>	

Stakeholder	Question/Comment	Response
	<p>like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.<a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes</a>. Should you require further information please contact Thames Water. Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a></p> <p>Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p>Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Water Comments There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're</p>	

Stakeholder	Question/Comment	Response
	<p>planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.  <a href="https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development/Working-near-or-divertingour-pipes">https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development/Working-near-or-divertingour-pipes</a></p> <p>If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage.  More information and how to apply can be found online at <a href="https://thameswater.co.uk/buildingwater">thameswater.co.uk/buildingwater</a>.</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>	
Cllr Bevan	<p>Comments: I note the previous applications for the adjacent / nearby fire damaged sites, my comments for these other previous applications. I have repeated below. As this application refers to a site that is nearby I am concerned</p>	<p>Design and comprehensive development addressed in para 6.4.1-5.</p> <p>A condition is attached requiring</p>

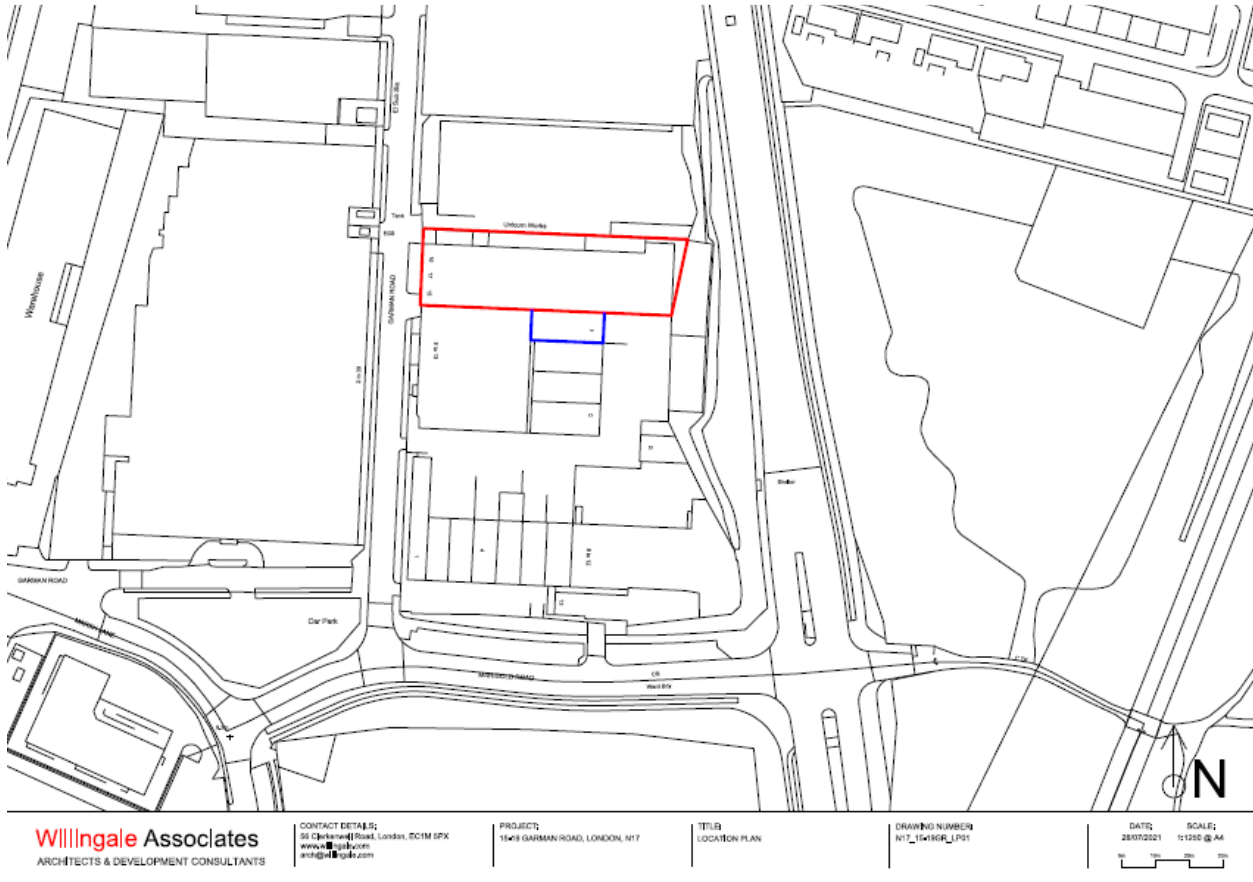
Stakeholder	Question/Comment	Response
	<p>that all future developments will have similar standards applied. This to achieve future uniformity of design and overall enhancement of all these adjacent developments / sites.</p> <p>I would draw attention to the industrial estate on Leaside Road, N17 0QJ, the Mowlem estate which has recently been developed and is to a very high standard in many respects. I would request that this development achieve the same high standards, including the green fencing, which ensures to some extent that the site does not look like a prison site. Assuming of course that fencing will be required for this development?</p> <p>I appreciate that this is an industrial site but I refer to the need for improved design and attractiveness that is now required by Haringey and The Mayor of London for all applications.</p> <p>In addition I now refer to the MAYOR of London's Supplementary Planning Guidance in particular I would require that this proposal will comply with the above guidance standards and indeed building regulations.</p> <p>I note the brick frontage to the existing which is of an attractive and interesting design, it would enhance the appearance of this development if this could be retained and incorporated into the new, this despite my comments re uniformity of design which would apply to the remainder of the site. Could also enhance the value / attractiveness of this project to future users / leaseholders / owners.</p>	<p>materials to be submitted for approval.</p>



Stakeholder	Question/Comment	Response
	I appreciate that this is an industrial site but I refer to the need for improved design and attractiveness that is now required by Haringey and The Mayor of London for all applications.	

## Appendix 2 Plans and Images

### Location Plan



View south along Garman Road



Side Access



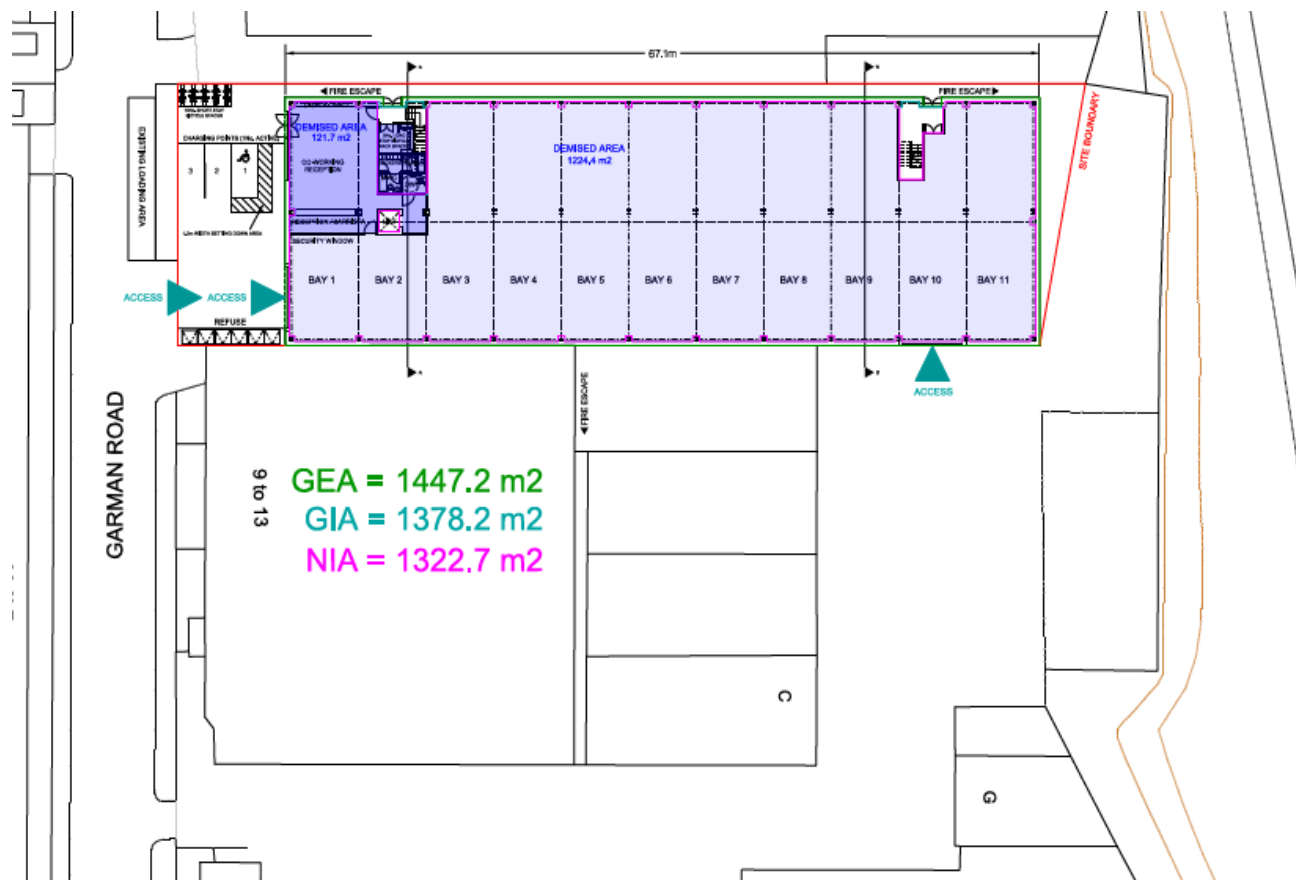
**View north along Garman Road**



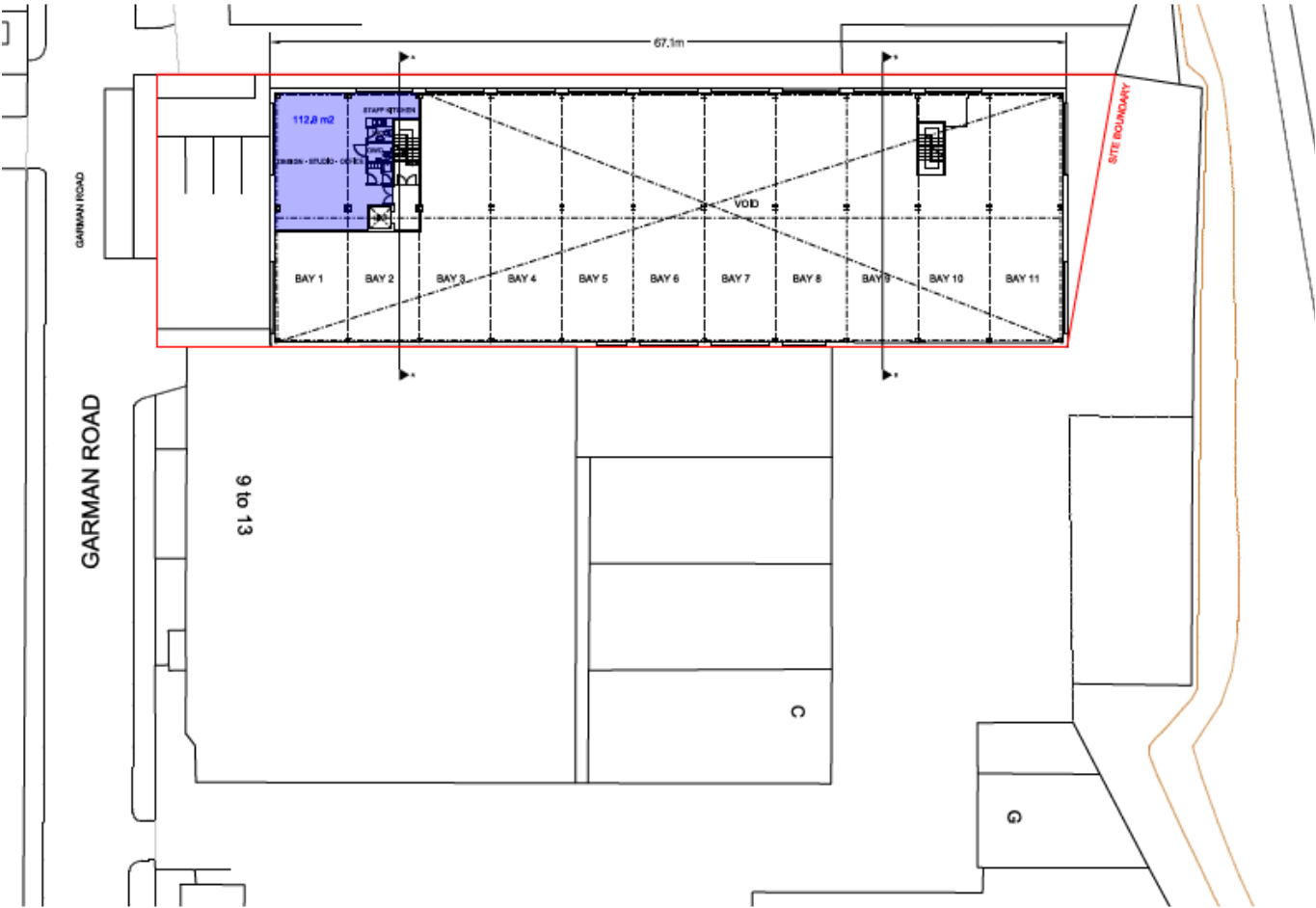
**Aerial photo of site from North West**



## Proposed Ground Floor Plan

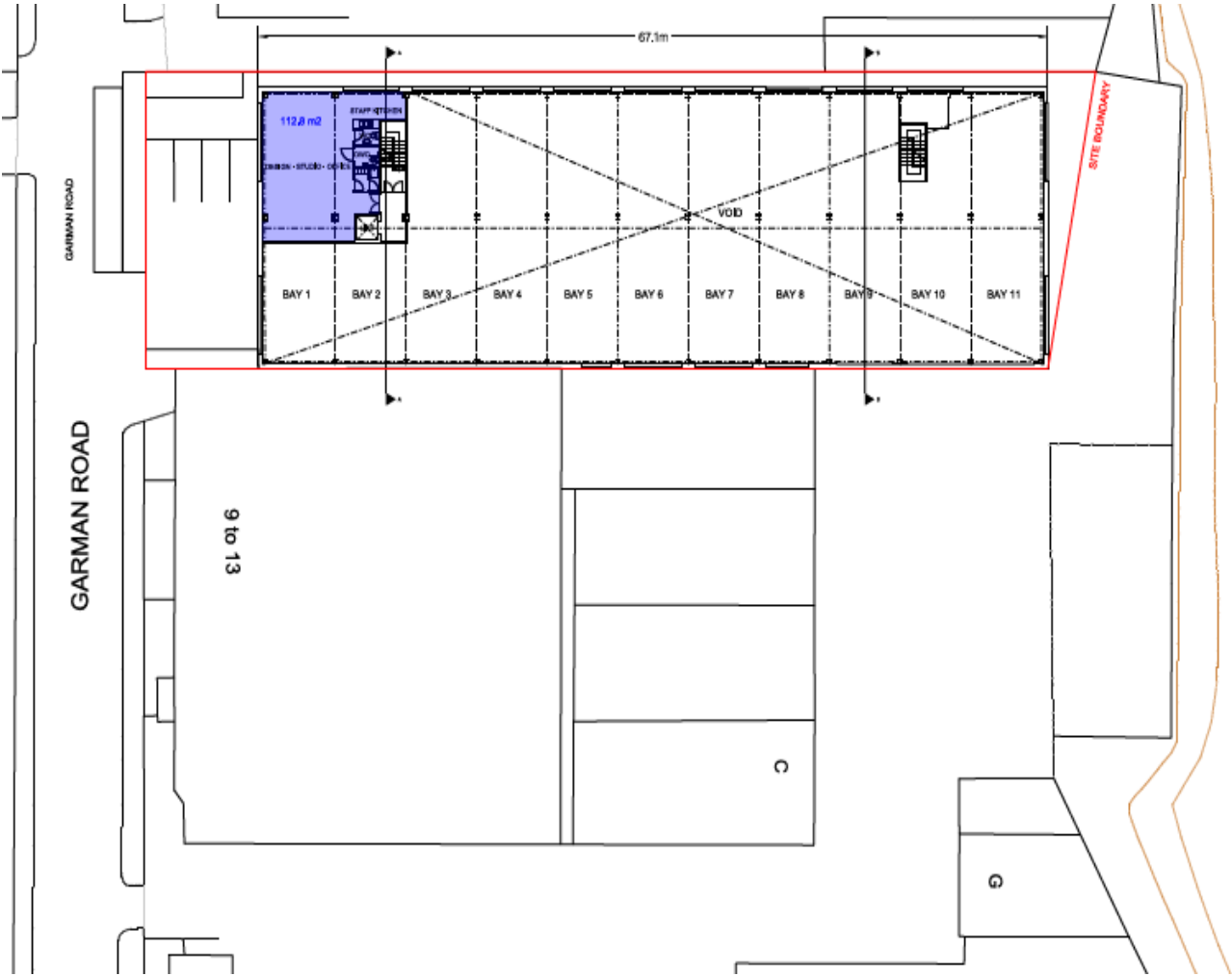


Proposed Frist Floor Plan

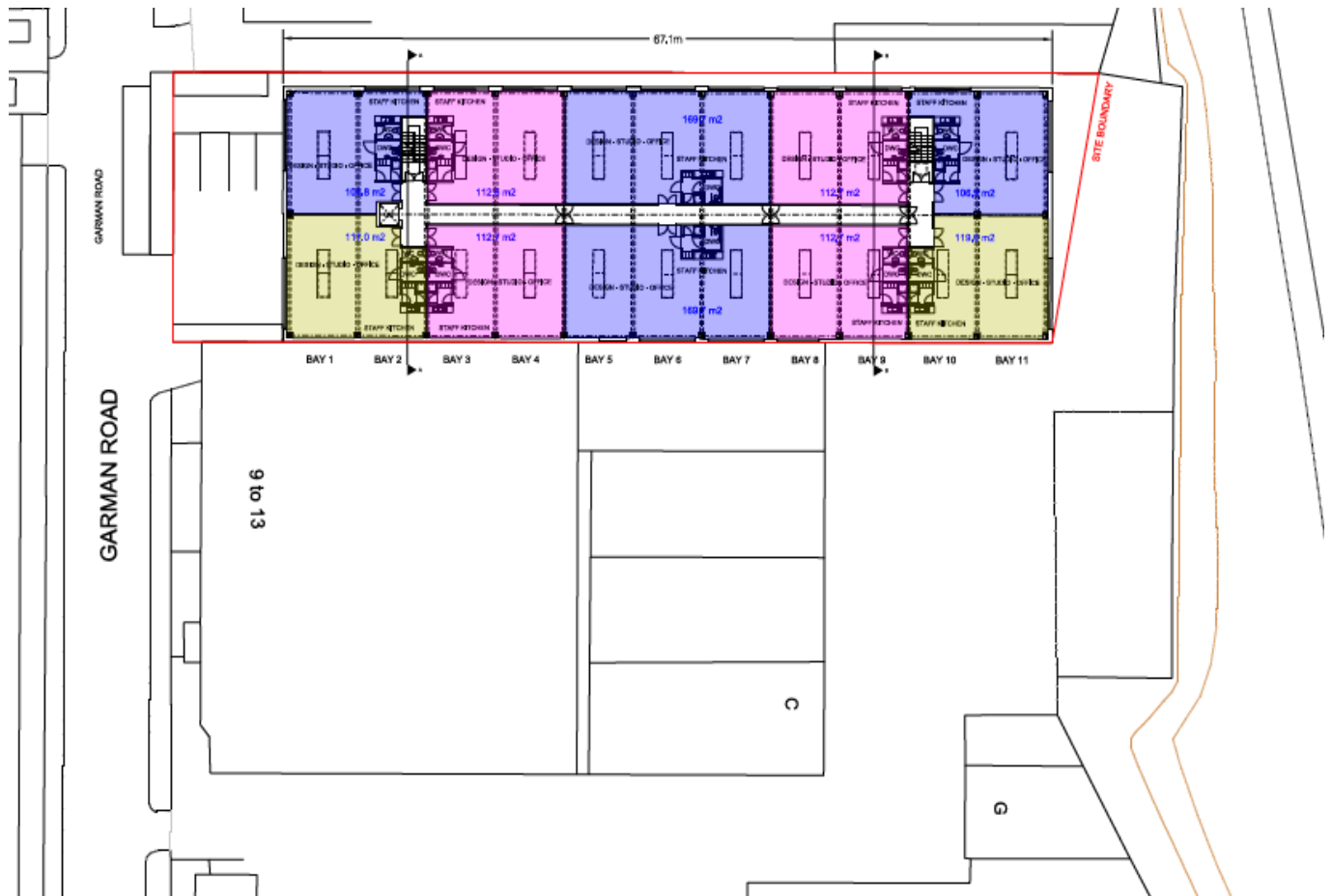




Proposed Second Floor Plan

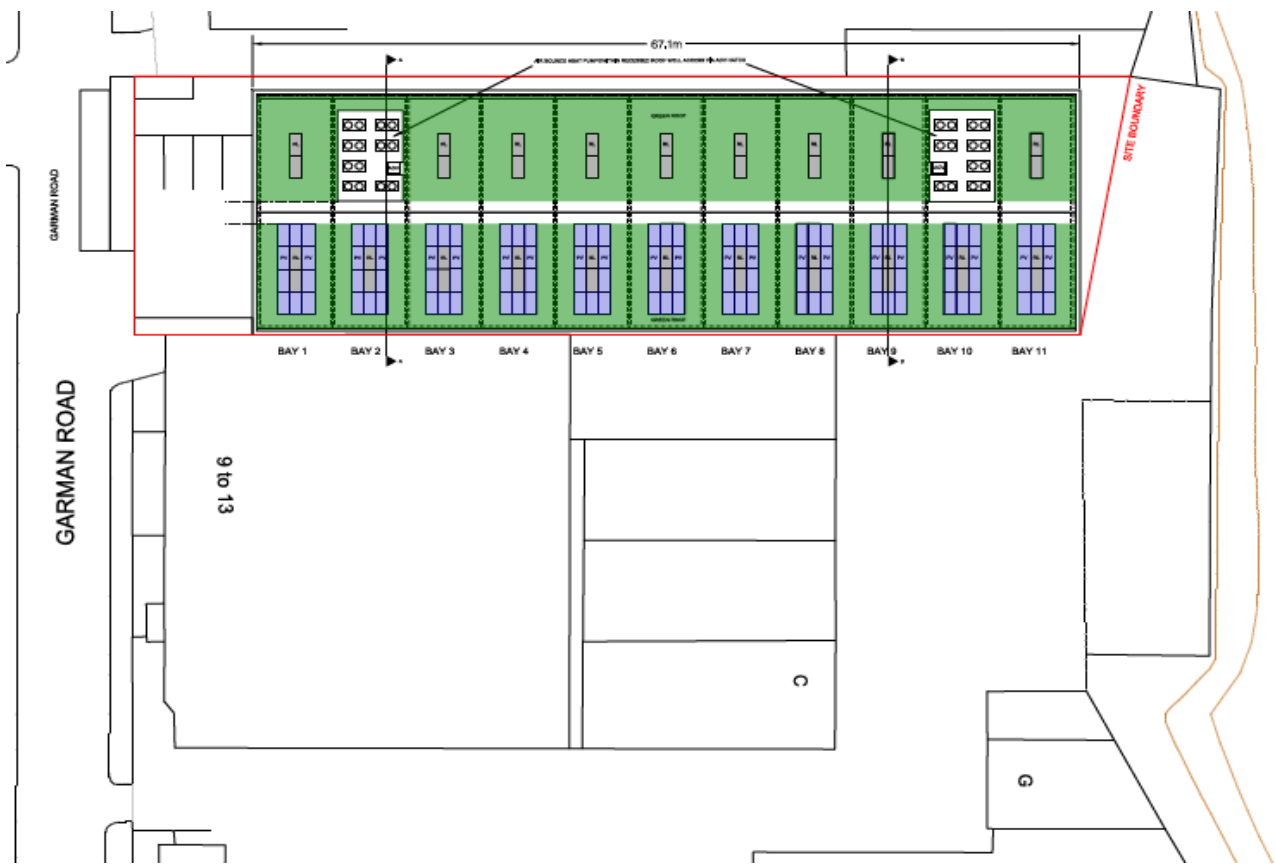


## Proposed Third Floor Plan



## Proposed Roof Plan





## Proposed Sections & Elevations

