Planning Sub Committee – 4 July 2022

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2022/0044

Ward: Hermitage & Gardens

Address: 108 Vale Road N4 1TD

Proposal: Application for full planning permission for a comprehensive redevelopment of the site to provide four buildings comprising flexible light industrial floorspace (Class E) and storage and distribution units (Class B8), together with car and cycle parking, plant and all highways, landscaping and other associated works.

Applicant: Florentia Property Unit Trust

Ownership: Private

Case Officer Contact: James Mead

Date received: 13/12/2021

1.1 This application is being referred to the Planning Sub Committee for a decision, as it is a major commercial development, where over 1,000 square metres of floor area is proposed.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- There is strong policy support for the provision of employment space and the intensification of industrial uses in this area, which forms part of a Locally Significant Industrial Site. The scheme would deliver high quality commercial space, an increased density of employment uses, new jobs and a range of unit sizes. These outcomes comply with the relevant planning policies along with aligning with the Council's wider economic strategy for the Borough.
- The development would be of a high standard of design, which would respect the character and appearance of the site, the street scene and the wider area. The scale of the development would complement the locality, whilst making best use of the available land. The materiality, form and detailing of the scheme would be reflective of the industrial setting and would also result in an appropriately distinctive appearance for the development. Overall, the scheme would improve on the appearance of the site and make a positive visual contribution to the wider locality.

- The operation of nearby businesses would not be compromised, and the living conditions of residential properties would not be harmed.
- The development would promote the use of sustainable transport. Sufficient car and cycle parking would be provided to ensure that sustainable travel would be prioritised. The arrangements for access, servicing and deliveries are appropriate, and would not harm highway safety.
- The scheme has been designed to include a number of sustainability measures, delivering an 89% reduction in carbon emissions.

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 31/08/2022 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

- 1) Development begun no later than three years from date of decision
- 2) In accordance with approved plans
- 3) Use Restriction
- 4) Use Restriction (Units D1, D2, D3, D4 and D5)
- 5) Samples of Materials
- 6) Details of Gates
- 7) Electric Charging
- 8) Delivery and Servicing Plan
- 9) Construction Environmental Management Plan

10)Contamination 11)Unexpected Contamination 12) BREEAM Certificate 13) Energy Strategy 14) DEN Connection 15)Overheating 16)Biodiversity Net Gain 17) External Lighting 18) Secured by Design Accreditation 19) Secured by Design Certification 20) Parking Management Plan 21)Cycle Parking 22)Internal Route Safety Measures 23)Removal of Redundant Accesses 24) Planting of Street Trees 25)Noise (Plant) 26)Storage

Informatives

- 1) Land Ownership
- 2) Party Wall Agreement
- 3) Hours of Construction Work
- 4) Numbering
- 5) Asbestos
- 6) Signage & Advertisement Consent
- 7) Thames Water
- 8) Designing Out Crime Officer

Section 106 Heads of Terms

- 1) Employment Initiative participation and financial contribution towards local employment and training:
 - a. Provision of a named Employment Initiatives Co-Ordinator;
 - b. Notify the Council of any on-site vacancies;
 - c. 20% of the on-site workforce to be Haringey residents;
 - d. 5% of the on-site workforce to be Haringey resident trainees;
 - e. Provide apprenticeships at one per £3m development cost (max. 10% of total staff); and
 - f. Provide a support fee of £1,500 per apprenticeship towards recruitment costs.
- 2) Sustainable Transport Initiatives:
 - a. Implementation of travel plan and monitoring of travel plan contribution of £3,000 per year for a period of 3 years;

- b. Contribution towards permit free with respect to the issue of business permits for the CPZ.
- 3) Carbon Mitigation:
 - a. Submission of Energy Plan for approval by LPA
 - b. Sustainability review on completion
 - c. Additional Carbon offset Contribution in the event that proposed carbon reduction targets are not met.
 - d. Ensure the scheme is designed to take heat supply from the proposed DEN (including submission of DEN Feasibility Study)
 - e. Design of secondary and (on-site) primary DHN in accordance with LBH Generic Specification and approval of details at design, construction, and commissioning stages.
 - f. Use all reasonable endeavours to negotiate a supply and connection agreement with the DHN within a 10-year window from the date of a planning permission.
 - g. Deferred carbon offset (it not connecting to the DEN) (£23,370)
 - h. Implementation of low-carbon heating supply if not connecting to the DEN replacing the temporary heat solution
 - i. 'Be Seen' Commitment to providing energy Data
 - j. Solar PV monitoring
- 4) Monitoring Contribution:
 - a. 5% of total value of contributions (not including monitoring);
 - b. £500 per non-financial contribution
 - c. Total monitoring contribution to not exceed £50,000
- 2.5 In the event that members choose to make a decision contrary to officers' recommendation, members will need to state their reasons.
- 2.6 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.2) above, the planning permission be refused for the following reasons:
 - 1. The proposed development, in the absence of a legal agreement to work with the Council's Employment and Skills team and to provide other employment initiatives, would fail to support local employment, regeneration and address local unemployment by facilitating training opportunities for the local population. As such, the proposal would be contrary to Policy SP9 of Haringey's Local Plan 2017.
 - 2. The proposed development, in the absence of a legal agreement that secures1) implementation and monitoring of a travel plan and 2) a contribution towards

permit free with respect to the issue of business permits for the CPZ, would fail to support sustainable transport and would give rise to unacceptable overspill parking impacts. Therefore, the proposal would be contrary to Policies T1 and T4 of the London Plan 2021, Policy SP7 of Haringey's Local Plan 2017 and Policies DM31 and DM32 of the Development Management DPD 2017.

- 3. The proposed development, in the absence of a legal agreement securing energy efficient measures, future connection to the DEN and a financial contribution towards carbon offsetting, would result in an unacceptable level of carbon emissions. Therefore, the proposal would be contrary to Policy SI2 of the London Plan 2021, Policy SP4 of Haringey's Local Plan 2017 and Policy DM21 of the Development Management DPD 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:
- **1.** There has not been any material change in circumstances in the relevant planning considerations, and
- 2. 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
- **3.** 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. PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS

Proposed Development

3.1. This is an application for the removal of existing storage containers, and the redevelopment of the site to provide four buildings, which would be utilised for flexible light industrial uses (use class: E) and storage & distribution uses (use class: B8). The scheme would also provide an internal yard area, car/cycle parking, plant, new landscaping and highway improvements.

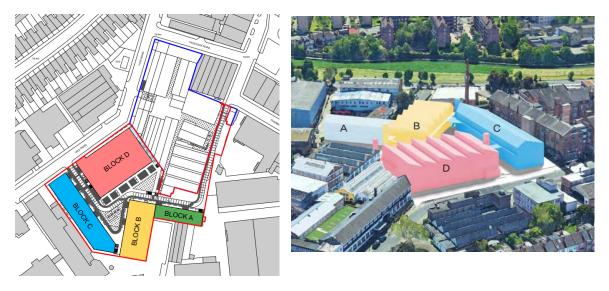


Figure 1 & 2: Proposed Site Location Plan & Massing Image

- 3.2. The existing site comprises 130 storage containers, whereas the proposed scheme would deliver 9,363 square metres of light industrial and storage & distribution floorspace. Approximately 4,736 square metres of the floorspace would be in solely light industrial use, with the remaining 4,627 square metres to be flexibly utilised for light industrial and storage & distribution uses. All the buildings would provide the floorspace over three levels (ground floor, mezzanine level and first-floor). The flexible light industrial and storage & distribution uses would be located at ground floor and mezzanine levels, while the first floor would be exclusively in light industrial use. It is anticipated that the development would deliver around 250 jobs on site and provide space for around 54 businesses. The scheme is proposed as an extension to the existing Florentia Clothing Village, which is located to the north-east.
- 3.3. Block A would be situated to the rear and in the south-eastern corner of the site. This would be the smallest of the buildings and would be accessed from the southern side of the yard area. The applicant notes that the units provided in Block A would be of 'small' to 'medium' sizes (115 square metres 166 square metres in floor area). Block B would also be sited to the rear of the site and adjacent to Block A, with the two buildings forming an 'L' shape layout. This building would be accessed from the yard area. It would be a block of greater scale and the applicant

outlines that the block would contain a variety of unit sizes ranging from 'extra small' to 'extra large' (77 square metres – 375 square metres in floor area).

- 3.4. Block C would sit on the western side of the site, with access again primarily taken from the yard area. The northern elevation of Block C would front onto Vale Road. The applicant explains that the units in Block C would range from 'extra-small' to 'large' (82 square metres 280 square metres in floor area), in terms of their size. Block D is proposed to be located on the northern part of the site and would front directly onto Vale Road. The units at the front of Block D at ground floor level are specifically proposed to be in light industrial use to create an active frontage onto Vale Road. These front units would be accessed directly from the footpath on Vale Road, while the other units would either be accessed from the yard area or from entrances on the side elevations of the building. The applicant notes that the unit sizes in Block D would vary between 'extra-small' and 'extra large' (47 square metres 502 square metres in floor area).
- 3.5. Pedestrian access to the wider site would be gained from Vale Road via a gate and path on the north-eastern side of the frontage. With regards to vehicular access, this would again be taken from Vale Road from one of the existing access points into the site. This access would run between Block C and Block D. A one-way route is proposed within the site, with vehicles entering from Vale Road, and then exiting onto Overbury Road, a road to the north-east.
- 3.6. A yard area is proposed to be created within the site, and between the new buildings. Car and cycle parking would be provided around the yard area, with this serving the new development and the existing Florentia Village. New landscaping is also focused on this yard area, however tree planting on Vale Road is also proposed.

Site and Surroundings

- 3.7. The site is currently occupied by approximately 130 storage containers associated with 'Storage for London', as well as hardstanding areas used for vehicle parking. This land is located on the southern side of Vale Road, with four existing access points available from this road into the site. Directly to the north-east is the Florentia Clothing Village, and this is in the same ownership as the application site. The Florentia Clothing Village comprises a mix of uses, including: light industrial, office and residential. Neighbouring to the south-west of the site is the former Maynards Factory, which is in commercial and industrial use. The immediate surroundings are predominantly made up of premises in commercial or industrial use, although some of the nearby buildings are also in residential use.
- 3.8. The land forms part of a Locally Significant Industrial Site (Vale Road/Tewkesbury Road), and therefore is specifically designated for employment and industrial uses. Additionally, the site is situated in the Harringay Warehouse District, and within the Seven Sisters Area of Change. There are several other sites in the

vicinity that have been allocated in the Site Allocations DPD (2017) for growth of employment uses and warehouse living accommodation.

- 3.9. There are no statutorily listed buildings within or nearby to the site, and the land is not within a Conservation Area. However, several locally listed buildings are situated directly to the south-west, including: the Maynards building and No 102 Vale Road.
- 3.10. In terms of public transport, Harringay Green Lanes overground station is situated approximately 650 metres to the west of the site, and Manor House underground station is located approximately 750 metres to the south-west. There are some bus services that run in the vicinity, with several routes available along Seven Sisters Road (A503), which is to the east. However, the site is identified as having a Public Transport Accessibility Level (PTAL) of 2, which indicates that access to public transport is 'poor'.



Figure 3: Aerial Photography of Site

Relevant Planning and Enforcement history

3.11. There is no recent relevant planning history on the site.

4. CONSULTATION RESPONSES

Planning Committee Pre-Application Briefing

4.1. The proposal was presented to the Planning Sub Committee at a Pre-Application Briefing on 8th November 2021. The relevant minutes in relation to this meeting are attached at Appendix 6.

Quality Review Panel

4.2. The scheme has been presented to Haringey's Quality Review Panel. The Panel's final written response is provided at Appendix 5.

Planning Application Consultation

4.3. The following consultations responses have been received:

Internal:

- 1) LBH Building Control: No objection.
- 2) LBH Carbon Management: No objection, subject to conditions and legal agreement.
- 3) LBH Pollution: No objection, subject to conditions.
- 4) LBH Transportation: No objection, subject to conditions and legal agreement.
- 5) LBH Waste Management: No objection.

External:

6) Metropolitan Police Designing Out Crime Officer: No objection, subject to conditions.

5. LOCAL REPRESENTATIONS

- 5.1 The application has been publicised by way of a press notice and a site notice. 442 individual letters were sent to surrounding local properties. The number of representations received from neighbours, local groups, etc in response to notification and publicity were as follows:
 - No of individual responses: 10
 - Objecting: 2
 - Supporting: 3
 - Neutral: 5
- 5.2 The following issues were raised in representations that are material to the determination of the application, and these are addressed in the next section of this report:
 - The proposal is underutilisation of the site and should be at a higher density.
 - No suitably sized units would be provided for existing micro/small businesses that use the site.
 - The numbering on the units should be removed.
 - The colours proposed for the units are intrusive.
 - Concern regarding increased traffic on Overbury Road.
 - Concern regarding increased traffic on Hermitage Road and Vale Road.
 - Inadequate parking is proposed.

- Inadequate planting and biodiversity would be provided.
- There would be inadequate space for waste.
- 5.3 The following issues raised are not material planning considerations:
 - The existing businesses on the site should be offered storage facilities in the new development (Officers note this is a private matter and not a material planning consideration).
 - Those individuals renting storage containers were not initially consulted by the developer. (Officers note this is a private matter and not a material planning consideration).

6. MATERIAL PLANNING CONSIDERATIONS

- 6.1 The main planning issues raised by the proposed development are:
 - 1. Principle of Development;
 - 2. Design, Layout and Appearance;
 - 3. Inclusive Design;
 - 4. Amenity of Adjoining Occupiers;
 - 5. Parking and Highway Safety;
 - 6. Energy and Climate Change;
 - 7. Flood Risk and Drainage;
 - 8. Ecology and Biodiversity;
 - 9. Fire Safety;
 - 10. Waste and Recycling;
 - 11. Land Contamination; and
 - 12. Employment and Training.

Principle of Development

- 6.2 The site is situated in the Vale Road/Tewkesbury Road Locally Significant Industrial Site (LSIS). Policy SP8 of Haringey's Local Plan Strategic Policies (2017) (Local Plan) outlines that sites located in an LSIS should be safeguarded for a range of industrial uses, including B1 (now class: E(g)), B2 and B8 uses, as long as these sites continue to meet the demand and needs of modern industry.
- 6.3 Local Plan Policy SP8 then highlights a demand in Haringey for an additional 23,800 square metres of employment floorspace up to 2026. This demand can be met through:
 - The reconfiguration and re-use of surplus employment designated land;
 - The intensification of the use of existing employment sites; and
 - The protection of existing viable employment uses on designated and nondesignated sites.
- 6.4 Similarly, London Plan Policy E4 outlines that a sufficient supply of land and premises to meet current and future demands for industrial and related functions should be provided and maintained. Furthermore, this policy explains that the

retention, enhancement and provision of additional industrial capacity should be prioritised in certain locations, having regard to accessibility, logistical requirements, distribution services, support for a range of business sizes and access to local employment. The intensification of business uses is supported in principle by London Plan Policy E7 and this can be delivered through introduction of small units, development of multi-storey schemes and the more efficient use of land.

- 6.5 Policy DM37 of Haringey's Development Management DPD (the DPD) also encourages the intensification, renewal and modernisation of employment land, where certain criteria are met. In line with this policy, the development should be designed to be flexible, allowing subdivision/amalgamation of units, so to provide for a range of business sizes. Additionally, the proposal must make a demonstrable improvement in the use of the site for employment purposes. Specific regard should be had to the quality/type of employment floorspace provided and the quality/density of jobs accommodated on site. The proposal must also seek to contribute to the achievement of the economic objectives set out in the Local Plan and other key Council plans/strategies.
- 6.6 The scheme seeks to deliver light industrial (class E) and storage & distribution (class B8) uses on the site. The provision of such uses is appropriate in a LSIS, and aligns with the land use designation outlined at Local Plan Policy SP8. The current occupation of the site by storage containers is considered an underutilisation of the land. Whereas, this proposal would supply a significant uplift in the quantity, density and quality of business floorspace on the site. This intensification is supported by policy at all levels and would represent a clear enhancement in the use of the site for employment purposes.
- 6.7 The submitted Design & Access Statement anticipates that approximately 250 jobs would be provided on the site, and workspace for around 54 businesses would be delivered. The creation of these jobs based in a higher quality commercial environment would benefit the local population through providing employment opportunities to residents. The delivery of these new jobs is again supported by planning policy at all levels, and also will contribute to the overarching economic objectives for the Borough.
- 6.8 A wide range of unit sizes are intended to be provided within the new blocks. Numerous smaller units (under 100 square metres in floor area) would be delivered, while large units measuring up to 502 square metres would also be supplied. It is considered that the variety of unit sizes proposed would cater for a wide range of different types of businesses, whilst also providing opportunities to businesses of different scales, including small and medium sized enterprises (SMEs). It is noted that a third party comment has raised concern regarding lack of suitable units for businesses of micro scale. While this is acknowledged, it is not considered that a lack of units for micro businesses would outweigh the wider

benefits of this scheme. As such, the proposed mix of unit sizes is considered appropriate.

6.9 Overall, higher quality commercial space would be provided, an increase in employment floorspace would be delivered, new jobs would be created and a range of unit sizes would be supplied. In addition, the proposal would contribute to the Borough's anticipated need for employment floorspace. As such, the scheme is considered to accord with the aforementioned policies and the proposed intensification of employment/industrial uses is acceptable in principle.

Design, Layout and Appearance

- 6.10 London Plan Policy D3 requires developments to make the best use of land by following a design-led approach that optimises the capacity of sites. Furthermore, this policy notes that proposals should enhance local context by delivering buildings that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy.
- 6.11 Proposals should also enhance and enrich Haringey's built environment, in line with Local Plan Policy SP11. Development must be of the highest standard of design that respects local context, character and historic significance, so to contribute to the creation and enhancement of Haringey's sense of place and identity. DPD Policy DM1 outlines that developments should relate positively to their locality, with particular regard to: building heights, form, scale and massing around the site. Furthermore, proposals should give full consideration to: urban grain, building lines, rhythm of plot/building widths, active frontages to the public realm and distinctive local architectural styles, detailing and materials.

Quality Review Panel (QRP)

- 6.12 The development proposal has been presented to the QRP. The Panel's summarised comments in relation to the latest review are provided below.
- 6.13 'The panel thanks the design team for their presentation, which set out clearly the improvements that have been made to the scheme since the last review. The panel welcomes in particular the changes made to the through-route and yard, including the introduction of greater greenery, as well as the refinement of the architecture. The ambitions for environmental sustainability are positive, but the panel notes that further work is required to ensure that these ambitions are realised. While noting the design team's reassurances, the panel still has some concerns about the relationship with the neighbouring property and it would like to see this rigorously tested.'
- 6.3.1 Details of the most recent review is below, together with Officer comments.

QRP's Comment	Officer Response

Building Form & Architecture	
The panel feels that the crisp architecture	Officers note these comments. The
has the potential to be successful, but notes	proposed materials and detailing are
that the specification of materials and high-	considered acceptable. The quality
quality detailing will be critical. It would	of materials will be secured via a
encourage the planning authority to secure	detailed condition.
key details within the planning application to	
safeguard the quality.	
	Officere note this support
The panel welcomes the provision of	Officers note this support.
smaller units and feels that the introduction	
of daylighting to the upper units will greatly	
enhance the working environment.	
The panel feels that the roofscape has	Officers note this support.
improved markedly since the last	
review.	
Landscape Design	
The panel welcomes the ambition to	The applicant has clarified that the
introduce greenery in the yard but questions	specified product is designed for a
the viability of 'grasscrete' within such a	'huge range of heavy traffic, parking
heavily used area and would like to see this	lots, construction sites, flatbeds
tested to ensure it will be a success.	
lested to ensure it will be a success.	turning etc'. Officers are content with
	this reassurance.
The use of permeable asphalt, which could	Officers note the support for the use
be beneficial in terms of surface water	of permeable hardstanding. The
management, is also welcomed, but the	scheme does not propose B2 uses
panel feels that the implications of	(general industrial). Such uses would
contaminants from the operation of the yard	be more likely to raise concerns
should be considered fully.	regarding contaminants. The
	proposed light industrial and storage
	& distribution uses, by their nature,
	would not be likely to generate
	contaminants.
The ambition to introduce street trees is	Officers are content that the street
welcome, but the panel notes that this	tree planting can be secured via a
•	
is beyond the application site. The applicant	condition.
and local authority should work	
together to ensure the trees are provided.	
Alternative streetscape solutions	
should be considered, if necessary.	
Connections and Boundaries	
The scheme's approach to making	Officers note this support.
connections to and through the wider area	
is a key strength of the proposal, and the	
panel is pleased that access to the yard and	
pedestrian through-routes are to be	
controlled at night.	
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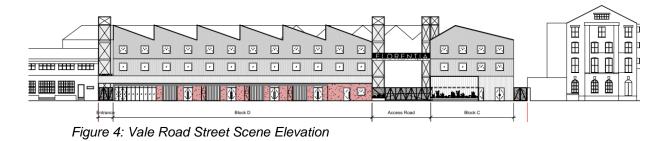
The panel has some remaining concerns about the relationship to the neighbouring property to the west, and it would like reassurance that the scheme neither compromises the daylight of the current occupant nor prejudices future development on that site.	The relationship between the proposed development and the property to the west is addressed in paragraph 6.32 of this report. Officers are content that sufficient spacing would be retained between the new buildings and the property to the west to ensure that the operation of the neighbouring commercial premises would not be compromised. The proposed development, in terms of its scale and siting, would not prejudice future development at the neighbouring site.
Sustainable DesignThe targeting of BREEAM Excellent is to be	Officers note this support.
commended, as is the ambition to achieve net zero carbon. The panel would like to see lower carbon materials considered, but welcomes the thought given to disassembly as a contribution to a circular economy approach.	
The panel notes that, even though some tenants will choose to take their bikes to their units, the scheme will still need to provide sufficient shared bike stores to be compliant with the London Plan.	Sufficient cycle storage would be provided to serve the development, in accordance with London Plan Policy T5. This is addressed further in paragraph 6.44 of this report.

6.14 The development proposal submitted as part of this application has evolved over time, in response to the comments of the QRP and Officers. It is considered that the points raised by the QRP, concerning the design of the proposal, have been satisfactorily addressed.

Height, Scale and Massing

6.15 The site is currently occupied by low level storage containers and this existing use is clearly an under-utilisation of the land. The proposed redevelopment would result in the presence of built form of notably greater scale on site. Blocks C and D are proposed to be constructed along the frontage of the site. These buildings would appear as three storey blocks when viewing the site from Vale Road. The surrounding area is comprised mainly of a mixture of two and three storey buildings, however it is noted that there are some higher buildings present in the vicinity. Having regard to the prevailing height of buildings in the locality, it is considered that the three-storey level of Blocks C and D would suitably respect the scale of built form in the area. Figure 4 below further supports this, as it shows that the new buildings would sit below the ridge height of the adjacent Maynards Factory. These two proposed blocks would not appear bulky in the plot, nor would they appear unduly large in the street scene or the surrounding area.

6.16 Blocks A and B would be constructed to the rear of the plot and along the southern boundary of the site. These buildings would also be of three-storey height, similar to that of Blocks C and D. Taking into account the scale of built form in the vicinity, this height is again considered appropriate. The siting of Blocks A and B to the rear of the site, coupled with the only three storey height, means that these buildings would not be highly visible from Vale Road. Views of Blocks A and B may be possible from Eade Road, which is the route to the rear of the site. However, these proposed new buildings would still be a notable distance from Eade Road. Furthermore, Blocks A and B would be of comparable scale to some buildings present along Eade Road. Noting the separation distance and the modest scale of the buildings, it is not considered that Blocks A and B would appear excessively large when viewed from Eade Road.



<u>Layout</u>

- 6.17 The proposed scheme would result in a large proportion of the site being covered by buildings. Furthermore, there would be a notable width of built form across the frontage of the site, the western boundary and the rear boundary. Blocks A and B would be set out in a 'L' shaped layout to the rear, whereas Block C would be a building of significant width that would spread across the western boundary of the site. Block D would have a regular rectangular footprint, and would be sited on the north-eastern part of the site. Block C and D would be separated by the vehicular access route into the site. Furthermore, a yard area would be created centrally in the site providing some separation between the buildings.
- 6.18 This layout is considered appropriate, as satisfactory spacing would be provided between the new buildings. There is no clear uniform pattern of development evident on this side of Vale Road. As such, it is considered that the proposal would not be at odds with any distinct urban grain of the area. The density of the scheme would be comparable to that of other industrial sites in the area, and therefore it is considered that the proposed intensification of the site would be appropriate to this setting. A third party comment has questioned whether a greater density of employment uses could be delivered on the site. This representation is acknowledged, however in this instance, the proposed intensification and increased density is considered to result in a development, which suitably respects the character of the area.

Form, Materiality and Detailing

- 6.19 There is a variety of building types present in this locality, with evidence of pitched roofs, flat roofs and asymmetric pitched roofs visible in the street-scene. Blocks A and C would be constructed with mainly an asymmetric pitched roof form, while Block B would incorporate multiple pitched roof elements. In terms of Block D, this building would be designed with several mono-pitched sloping roof forms. Taking into account the mixture of building typologies in the area, it is considered that the proposed form of the new blocks would be acceptable, and the new buildings would not appear out of keeping in the vicinity.
- 6.20 The main external material proposed to be utilised is metal cladding, for the walls and roofs of the buildings. This material is industrial in character, and as such would be appropriate to this setting. Fibre cement panelling is proposed to be inserted at ground floor level on the street facing elevation of Block D. The addition of this material would suitably break-up views of this building from the street, whilst also providing an appropriately contemporary element to the appearance of this block.
- 6.21 Other features are intended to be incorporated into the site, including: aluminium stairways, clerestory windows and solar panels. These additions would be in keeping with the industrial character of the site and the surrounding area. The Design & Access Statement outlines an intention to incorporate bright colouring throughout the development. This is considered acceptable, as it would relate well to the appearance of the existing Florentia Village, whilst also ensuring that the development would have a unique and distinctive character.

Public Realm and Landscaping

- 6.22 Street trees are proposed to be planted on the footway to the front of the site, and these would enhance the appearance of Vale Road. The planting of these trees can be secured via a condition.
- 6.23 Within the site a large amount of hard surfacing (grey asphalt) would be laid, however some planters and 'grasscrete' would be incorporated into the yard area. The large degree of hard surfacing is typical for industrial sites, and is required to allow for the free flow of vehicles within the yard area. As such, the laying of the hard surfacing is considered acceptable. The planters and 'grasscrete' would provide a green element within the yard area, and this is supported.

Heritage Impacts

6.24 The site is not located in a conservation area, nor within the setting of any listed buildings but is adjacent to a locally listed building. DPD Policy DM9 also requires proposals to have regard to the priority given to sustaining and enhancing the significance of locally listed buildings, and their setting.

6.25 The existing storage containers on the site are considered to detract from the setting of the locally listed buildings to the south-west of the site. Whereas, the design and appearance of the proposed redevelopment would respect and complement the industrial character of the neighbouring locally listed buildings. The setting and significance of these heritage assets would be enhanced through the proposed scheme.

<u>Summary</u>

6.26 The proposed redevelopment would enhance the appearance of this underutilised site, which currently detracts from the character of the street-scene and the surrounding area. The new buildings would be of high quality, and would relate well to the industrial nature of the area. The height, bulk, scale, massing and layout of the redevelopment would respect the character of the surrounding area, whilst also making best use of the available space on the site. The materials and detailing would be reflective of the setting, but would also result in an appropriately distinctive appearance for this new industrial hub. Overall, the development would make a positive contribution to the area, and would improve upon the character and appearance of the site, the street scene and the wider locality. The proposal is considered acceptable in design terms and complies with the relevant policies.

Inclusive Design

- 6.27 London Plan Policy D5 explains that proposals should ensure the highest standards of accessible and inclusive design. Developments should be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment. In addition, DPD Policy DM2 requires that all new developments can be used safely, easily and with dignity by all.
- 6.28 The Design & Access Statement outlines that the development is a fully inclusive scheme. It is explained in this document that step free access is possible across the site, and the addition of lift cores will ensure step free access to all floors. Numerous wheelchair accessible WCs would be provided across the development. The scheme is considered to be an accessible and inclusive development, in accordance with the above mentioned policies.

Amenity of Adjoining Occupiers

6.29 London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, in specific it sets out that proposals should provide sufficient daylight and sunlight to surrounding housing, while also minimising overshadowing. Furthermore, new noise generating development should put in place measures to mitigate and manage noise impacts for neighbouring residents and businesses, in line with London Plan Policies D13 and D14.

6.30 Development proposals should ensure a high standard of privacy and amenity for a development's users and neighbours, in accordance with DPD Policy DM1. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land. An appropriate amount of privacy should be provided to neighbouring properties by avoiding overlooking. DPD Policy DM1 also requires proposals to address issues of vibration, noise, fumes and odour.

Impacts on Existing Businesses

- 6.31 There are numerous commercial premises present in the vicinity of the site. It is considered that the proposed light industrial and storage & distribution uses would integrate well with the other commercial premises in the area. The noise generated by the proposed uses would not be substantially different to that created by the other industrial uses, and therefore it is considered that the operation of businesses in the area would not be materially harmed by noise generation from the proposed development.
- 6.32 The QRP did raise concerns regarding the relationship between the proposed development and the Maynards building to the south-west. It is acknowledged that the Maynards building does have numerous windows present on its north-eastern elevation, which faces the site. However, it is important to note that this building is in commercial use, and therefore the assessment of sunlight/daylight is not as stringent, as it would be for residential properties. Notwithstanding this, it is considered that sufficient spacing would be retained between Block C and the main flank elevation of Maynards building, so as to ensure that the use of this commercial space would not be compromised. This spacing is demonstrated in figure 5.
- 6.33 The operation and functioning of neighbouring and nearby businesses would not be materially harmed by the proposed development. Therefore, from this perspective, the proposal would comply with the relevant policies.

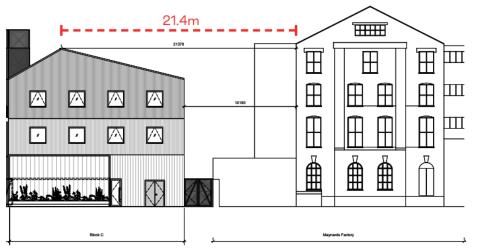


Figure 5: Elevation demonstrating distance to Maynards building

Impacts on Nearby Residential Properties

- 6.34 The nearby residential properties do not directly adjoin the site or the Florentia Clothing Village. It is considered that the proposed new buildings would be a sufficient distance from residential properties, so to avoid: harmful losses of sunlight/daylight, excessive overshadowing, undue restriction of outlook or overbearing impacts. This assessment, in terms of impacts on daylight and sunlight, is backed up by the submitted 'Daylight, Sunlight Report'. This document concludes that there is a good level of compliance with BRE guidance. The separation distance between the new buildings and the nearest residential properties would ensure that inappropriate overlooking from the units would not occur. Therefore, there would not be an invasion of the privacy of neighbouring properties.
- 6.35 An Acoustic Report has been provided in support of this application, and this includes a Noise Survey. Levels of noise at various points within, and adjacent to, the site have been measured through this Noise Survey. Noting the results of this survey, the Acoustic Report sets limits for noise levels at the nearest noise sensitive premises (residential properties at Pacific House, Florentia Clothing Village and on Hermitage Road). Subject to noise levels not exceeding the limits outlined in the Acoustic Report, it is considered that the living conditions of nearby residential properties would be protected against noise generation from the new commercial units. A condition is recommended requiring that all plant and machinery is designed, so to not exceed the limits outlined in the Acoustic Report.
- 6.36 The amenity and living conditions of the nearby residential properties would not be compromised, and therefore the proposal would comply with the aforementioned policies.

Parking and Highway Safety

- 6.37 London Plan Policy T4 explains that proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. In terms of cycling, London Plan Policy T5 requires developments to provide appropriate levels of cycle parking, which should be fit for purpose, secure and well located. Cycle parking should be provided in accordance with the minimum standards in Table 10.2 of the London Plan. London Plan Policy T6 sets out that car parking should be restricted in line with the levels of existing and future public transport accessibility and connectivity. Developments should be designed to provide the minimum necessary car parking. The maximum parking standards, outlined in Table T6.2 of the London Plan, should be applied to this proposal. The standards for non-residential disabled persons parking are identified in Table 10.6 of the London Plan.
- 6.38 Local Plan Policy SP7 outlines that the Council aims to tackle climate change, enhance environmental quality and improve transport safety by promoting public transport, walking and cycling. High trip generating developments should be

located where public transport accessibility is high and car parking is minimised, in accordance with DPD Policy DM31.

Trip Generation

6.39 As previously noted, the site has a PTAL of 2, which indicates that access to public transport is 'poor'. The submitted Transport Assessment estimates that approximately 720 daily trips (including walking, cycling, public transport and private vehicle) would be associated with the new industrial units. This uplift in trips is acknowledged, however the Transport Assessment highlights that a large portion of journeys to the existing Florentia Clothing Village are undertaken via walking, cycling and public transport. It is anticipated that such sustainable journeys would also be adopted by the occupiers of the new units. In addition to this, the scheme proposes a low level of on-site car parking, which would limit the attractiveness of travelling to the site by car. A Travel Plan should be provided and secured via a S106 Legal Agreement, so to ensure that sustainable travel to the site is confirmed. Subject to this, it is considered that the development would suitably support sustainable transport.

Third party comments have been received raising concerns regarding possible increased traffic on Overbury Road, Hermitage Road and Vale Road. These representations are acknowledged, however the Council's Transportation Officers have not raised concerns regarding traffic generation. Furthermore, the submitted Transport Statement notes that the development would not adversely impact the capacity of the local highway network. As such, there is no evidence that the proposal would harmfully increase traffic or congestion in the area.

<u>Car Parking</u>

- 6.40 The submitted Transport Statement explains that parking would be shared between the existing Florentia Clothing Village and the new development, with all the car parking serving both sites delivered on the application site. A total of 41 parking spaces (including 2 accessible parking bays) would be provided for the existing businesses at Florentia Clothing Village and for the occupiers of the new commercial units. An additional 12 car parking spaces would be provided for visitors and deliveries. This level of car parking is significantly below the maximum car parking standards, in accordance with London Plan Policy T6. The Council's Transportation Team have considered this quantity of parking provision and support the level proposed. It is considered that this reduced level of parking would support a shift to more sustainable travel for those working at Florentia Clothing Village and occupying the new units. The proposed car parking provision is considered appropriate for the development.
- 6.41 A total of 2 accessible car parking spaces would be provided within the yard area. This level of accessible car parking would meet the requirements of Table 10.6 of

the London Plan, which requires 5% of all parking spaces to be designated as disabled persons parking bays.

6.42 The applicant's Transport Note from 29 April 2022 sets out an intention to supply 10 electric vehicle charging spaces. The latest comments from the Council's Transportation team support this provision. It is officers' view that this number of charging points is sufficient to meet the requirements of the London Plan, which requires appropriate provision for electric or other ultra-low emission vehicles.

Cycle Parking

- 6.43 The submitted Transport Statement explains that 86 cycle parking spaces would be supplied to share between the proposed development and the existing Florentia Clothing Village. This level of cycle parking provision complies with the London Plan requirements. The Council's Transportation Team have queried the type and form of cycle storage. Noting this, a condition is recommended requiring further details of the proposed cycle storage facilities. This will enable officers to ensure that the cycle storage installed meets the requirements of the London Cycling Design Standards (2014).
- 6.44 The cycle storage would be provided in two separate areas. Firstly, it is proposed to install cycle storage within the yard area and this is acceptable. The second area of cycle storage would be located to the front of the existing main Florentia Clothing Village building. This cycle storage would replace an existing security hub. It is noted that this cycle storage would be sited close to the footway on Vale Road. In order to ensure that the cycle storage, and the associated access, would not obstruct the footway, a condition is recommended requiring details of the exact location of the cycle storage.

Access Arrangements

6.45 There are currently four accesses from Vale Road into the site. The Transport Statement outlines that it is proposed to retain one of these existing accesses. The Transportation Team are content with this, however note that the applicant will be required to enter into a Section 278 agreement with the Highway Authority, so to reinstate kerbs and the footway. A condition should be attached restricting occupation of the units until an agreement is in place to remove these three redundant accesses and reinstate the footway.

Delivery & Servicing

6.46 All delivery and servicing is proposed to take place within the yard area. Vehicles would access the site from Vale Road, before temporarily parking in the designated delivery bays. Following this, vehicles would leave the site onto Overbury Road. This arrangement would enable vehicles to access and leave the site all in forward gear. Such movements are considered appropriate and would allow the free flow of delivery and service vehicles through the site.

- 6.47 The Transportation Team has queried the dimensions of the internal route through the site, particularly with regard to the potential for conflicts between vehicles and pedestrians. A swept path analysis has been provided by the applicant and this is shown in figure 6. This demonstrates that large vehicles would be capable of moving through the site. The latest response from the applicant (TN07) explains that the internal yard is proposed to be a shared space between vehicles and pedestrians. Clearly designated routes for pedestrians are intended to be painted onto the surface. Furthermore, the applicant explains that vehicles would travel slowly through the site, with a 5mph speed limit suggested.
- 6.48 Shared spaces between pedestrians and vehicles are not uncommon in industrial areas. In addition, the low speed limit stated should limit the risk of conflict between pedestrian and vehicles. The Transportation Team have noted the latest response from the applicant and this consultee now recommends the inclusion of a condition securing details of safety measures within the site. Subject to suitable details being provided through condition, it is not considered that there would be an undue risk of conflict between pedestrians and vehicles. Therefore, the internal route through the site is considered acceptable.



Figure 6: Swept Path for Large Vehicle

Construction Phase

6.49 A comprehensive draft of the Construction Logistics Plans has been provided as part of the Transport Statement. The Transportation Team are generally content with this, and the final Construction Logistics Plan should be secured via condition.

Energy and Climate Change

- 6.50 London Plan Policy SI2 outlines that all major developments should be net zero carbon, and a detailed energy strategy should be provided with such proposals, so to demonstrate how the zero-carbon target will be met. This policy also sets out that a minimum on-site reduction of at least 35% beyond Building Regulations is required. London Plan Policy SI4 notes that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating.
- 6.51 Local Plan Policy SP4 requires all new developments to take measures that reduce energy use and carbon emissions. Sustainable design and construction techniques should be adopted, in line with Local Plan Policy SP11 and DPD Policy DM21.

Carbon Reduction

- 6.52 The applicant has submitted an Energy Statement in support of this application, and this has been reviewed by the Council's Climate Change Officer. Photovoltaic panels are proposed to be incorporated into the south facing roofs of the blocks, and high thermal standards are intended for the building fabric. It is proposed to provide a temporary communal gas-fired heating system, prior to connection to the decentralised energy network (DEN), when this becomes available. The applicant has confirmed that a Building Control notice has been obtained to allow this system under Building Regulations.
- 6.53 The overall predicted reduction in carbon dioxide emissions is 89%, and this is supported by the Council's Climate Change Officer. A carbon offset contribution is required to achieve 'zero carbon', and this should be secured via Section 106 legal agreement. In order to optimise carbon emission mitigation and sustainability, conditions should be attached regarding adherence to the Energy Statement, and requiring further details of the Energy Strategy. Subject to the conditions and the legal agreement, the proposal would comply with the relevant policies.

Overheating

6.54 A Ventilation and Overheating Strategy has been provided with this application. This document explains that all of the units tested pass the overheating requirements, and the Council's Climate Change Officer confirms that the overall overheating strategy is considered acceptable. A condition is required to be attached to secure measures that would reduce the risk of overheating. Subject to this, the proposal would not be at risk of overheating, and would accord with the previously mentioned policies.

Flood Risk and Drainage

- 6.55 London Plan Policy SI12, Local Plan Policy SP5 and DPD Policy DM23 all require development proposals to minimise, manage and reduce the risk of flooding. The site is within a Critical Drainage Area, and DPD Policy DM25 requires proposals in such areas to reduce the overall risk from flooding. In addition, development should ensure that surface water run-off is managed as close to its source as possible, in accordance with London Plan Policy SI13.
- 6.56 The site is located within Flood Zone One, and as such there is a low probability of flooding. Noting this, and given the 'less vulnerable' nature of the proposed uses, it is not considered that the development would be at undue risk of flooding. A Surface Water Drainage Strategy has been outlined in the submitted Flood Risk Assessment. This explains that the site currently comprises of impermeable hardstanding. Whereas, the proposed scheme would use permeable paving for all hardstanding areas. The use of permeable paving will provide improved water Drainage Strategy also explains that it is intended to discharge water into the public sewer. Officers do not object to this arrangement, however this will be subject to agreement and approval from Thames Water.
- 6.57 The risk from flooding on site would not be increased, as a result of the development. Management of surface water would be improved, when compared with the existing conditions. Therefore, the scheme would comply with the relevant policies.

Ecology and Biodiversity

- 6.58 London Plan Policy G6 and Local Plan Policy SP13 explain that proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. In addition, proposals on sites which are, or are adjacent to, internationally designated sites, Sites of Special Scientific Interest, Local Nature Reserves, Sites of Importance for Nature Conservation or Ecological Corridors, should protect and enhance nature conservation value, in accordance with DPD Policy DM19.
- 6.59 The land is not designated for nature conservation. Internationally, nationally or locally designated wildlife sites would not be adversely impacted by the proposed development. The submitted Ecological Assessment outlines that no protected species would be harmed by the proposed works. The site is of low ecological value, and biodiversity net gain can be achieved through implementing the measures identified in Section 5 of the Ecological Assessment. A condition is to be attached to secure the biodiversity enhancements outlined in the Ecological Assessment.
- 6.60 London Plan Policy G5 outlines that major developments should contribute to the greening of London by including urban greening as a fundamental element of the site and building design. The Mayor recommends that an urban greening factor of 0.3 should be achieved for commercial development.

6.61 The submitted Planning Statement explains that the scheme would achieve an urban greening factor (UGF) of 0.012. It is acknowledged that this UGF is below the London Plan target, however officers are of the view that the applicant has made every attempt to limit the levels of hardstanding within this industrial setting. In addition, the provided Ecological Assessment explains that the proposal would deliver a biodiversity net gain of 352.87% on the site, with a notable amount of this net gain being a result of new planting. New planting is proposed within the site and across the frontage with Vale Road. In this instance, it is considered that the failure to achieve the London Plan's UGF targets would be outweighed by the highlighted ecological and landscaping benefits of the scheme. Therefore, from an ecological and landscaping perspective the proposal would be acceptable.

Fire Safety

- 6.62 London Plan Policy D12 requires new developments to achieve the highest standards of fire safety. To this effect, a Fire Statement should be provided with all major developments.
- 6.63 A Fire Strategy has been submitted in support of the application. This document explains that the fire appliance could enter the site from Vale Road. A fire appliance tracking drawing included at Appendix C of the Fire Strategy shows that a route of 4.2 metres in width would be provided within the site. This route would allow the fire appliance to move through the site. Therefore, this plan demonstrates that fire vehicles could adequately access the site. The Fire Strategy also outlines evacuation plans, indicates escape routes and sets out the intention to install an alarm system. Subject to adherence with the measures identified in the Fire Strategy, it is considered that the development would be acceptable, in respect of fire safety.

Waste and Recycling

- 6.64 London Plan Policies SI7 and SI8 indicate the Mayor's support for waste reduction, resource conservation, recycling and material re-use. In addition, Local Plan Policy SP6 and DPD Policy DM4 require development proposals to make suitable provision for waste storage and recycling storage, as well as collection.
- 6.65 The Design & Access Statement notes that the refuse and recycling storage would be located in the south-eastern corner of the site, close to the exit onto Overbury Road. A Refuse and Recycling Management Strategy has been outlined in the submitted Transport Statement. This notes that collection will be undertaken by an appointed contractor, and not by the Council. Refuse vehicles would enter via

the Vale Road access, park temporarily in the yard area to load refuse and recycling, before exiting the site onto Overbury Road. Therefore, it is proposed for refuse vehicles to follow the one-way route through the site, and this will ensure minimal disruption to the surrounding public highway. The Council's Waste & Street Cleansing team have reviewed the application, and they are content with the proposals. As such, the proposed refuse and recycling strategy is considered to accord with the relevant policies.

Land Contamination

- 6.66 DPD Policy DM23 outlines that new developments will only be permitted where it is demonstrated that any risks associated with land contamination can be adequately addressed, in order to make the development safe.
- 6.67 A Phase II Ground Investigation Report has been submitted in support of this application. The Council's Pollution Officer has reviewed the provided documentation, and has not objected to the proposal. However, this Officer does not agree with the conclusion of the report, as it advises that no land remediation works are required. Instead, the Pollution Officer recommends that conditions are attached to any approval requiring further site investigation. These conditions, it is considered that the proposed development would comply with the relevant policies.

Employment and Training

- 6.68 Local Plan Policies SP8 and SP9 aim to support local employment and facilitate training opportunities. The Planning Obligations SPD also requires the developer (and its contractors and sub-contractors) to notify the Council of job vacancies, and to employ a minimum of 20% of the on-site workforce from local residents (including trainees nominated by the Council).
- 6.69 The applicant has agreed to provide employment opportunities during the construction of the development, with this to be secured by the legal agreement.

Conclusion

- 6.70 There is strong policy support for the provision of employment space and the intensification of industrial uses in this area, which forms part of a Locally Significant Industrial Site. The scheme would deliver high quality commercial space, an increased density of employment uses, new jobs and a range of unit sizes. These outcomes comply with the relevant planning policies along with aligning with the Council's wider economic strategy for the Borough.
- 6.71 The development would be of a high standard of design, which would respect the character and appearance of the site, the street scene and the wider area. The

scale of the development would complement the locality, whilst making best use of the available land. The materiality, form and detailing of the scheme would be reflective of the industrial setting and would also result in an appropriately distinctive appearance for the development. Overall, the scheme would improve on the appearance of the site and make a positive visual contribution to the wider locality.

- 6.72 The operation of nearby businesses would not be compromised, and the living conditions of residential properties would not be harmed.
- 6.73 The development would promote the use of sustainable transport. Sufficient car and cycle parking would be provided to ensure that sustainable travel would be prioritised. The arrangements for access, servicing and deliveries are appropriate, and would not harm highway safety.
- 6.74 The scheme has been designed to include a number of sustainability measures, delivering an 89% reduction in carbon emissions.
- 6.75 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION.

7. COMMUNITY INFRASTRUCTURE LEVY (CIL)

7.1. Based on the information given on the plans, the Mayoral CIL charge will be £565,150.68 and the Haringey CIL charge will be £0 as the use is subject to a Nil Rate.

8 **RECOMMENDATION**

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

Applicant's drawing No.(s):

- PL-001 P1
- PL-002 P1
- PL-100 P1 (Existing Ground Floor Plan)
- PL-100 P1 (Proposed Floor Plans Block A)
- PL-100 P1 (Proposed Floor Plans Block B)
- PL-100 P1 (Proposed Floor Plans Block C)
- PL-100 P1 (Proposed Floor Plans Block D)
- PL-110 P1
- PL-111 P1
- PL-112 P1
- PL-112 P2

- PL-113 P1
- PL-200 P1 (Existing Sections & Elevations)
- PL-200 P1 (Proposed Elevations Block A)
- PL-200 P1 (Proposed Elevations Block B)
- PL-200 P1 (Proposed Elevations Block C)
- PL-200 P1 (Proposed Elevations Block D)
- PL-210 P1
- 2102018-GA01
- 2102018-TK01 B
- 2102018-TK02 B
- 2102018-TK03 B
- 2102018-TK04 B
- X-70-100 T3
- Design & Access Statement
- Acoustic Planning Report Version E
- Air Quality Assessment
- BREEAM 2018 Pre-Assessment Report Issue No.1
- Daylight, Sunlight Report
- Ecological Assessment Issue 2
- Energy Statement for Planning Issue 3
- RIBA Stage 3 Fire Strategy Report Revision 04
- Flood Risk Assessment Revision A
- Phase II Ground Investigation Report Revision 02
- Soft Landscape & Planting
- Sustainability Report
- Transport Assessment Issue v1.0
- Ventilation & Overheating Strategy Rev 03