

Appendix 1: Conditions and Informatives

Conditions

Three Year Time Limit

- 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.

Approved Plans

- 2) The approved plans comprise drawing nos: 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 and Ventilation & Overheating Strategy Rev 03.

The development shall be completed in accordance with the approved plans except where conditions attached to this planning permission indicate otherwise or where alternative details have been subsequently approved following an application for a non-material amendment.

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

Use Restriction

- 3) As per the approved plans, the units/space shall be restricted to flexible light industrial uses (Class E(g)) and storage & distribution (Class B8) uses only, and shall not be used for any other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, or in any provision equivalent to that Class in any

statutory instrument revoking and re-enacting that Order with or without modification), unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure that an appropriate type of development is provided in connection with this designated employment site, in accordance with Policy SP8 of the Haringey Local Plan 2017.

Use Restriction (Units D1, D2, D3, D4 and D5)

- 4) As per the approved plans, the units within Block D at ground floor and mezzanine floor, which front onto Vale Road (Units D1, D2, D3, D4 and D5) shall be restricted to light industrial (Class E(g)) use only, and shall not be used for any other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification), unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure that an active frontage onto Vale Road is provided, in the interests of visual amenity, and in accordance with Policy DM1 of The Development Management DPD 2017.

Samples of Materials

- 5) Prior to commencement of above ground construction works, the following details and materials in relation to the new buildings hereby permitted shall be submitted to and approved in writing by the Local Planning Authority:
 - a) Samples and manufacturer's details of all materials to be used in the external surfaces of the new buildings, including: masonry, cladding, roofing material, cement panels and window frames.
 - b) Detailed drawings at a scale of 1:20 or 1:10 of: doors, windows, roller shutter doors, external stairs, walkways (including their columns, decks and balustrades), building corners, roof eaves, ridges and parapets.The development shall thereafter be carried out in accordance with the approved details.

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 D3 of the London Plan 2021, Policy SP11 of the Haringey Local Plan 2017 and Policy DM1 of The Development Management DPD 2017.

Details of Gates

- 6) Prior to installation of pedestrian and vehicle gates, manufacturer's details and detailed drawings at a scale of 1:20 or 1:10 of the gates fronting onto Vale Road shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved details.

Reason: In order for the Local Planning Authority to retain control over the exact materials and in the interests of visual amenity, consistent with Policy D3 of the London Plan 2021, Policy SP11 of the Haringey Local Plan 2017 and Policy DM1 of The Development Management DPD 2017.

Electric Charging

- 7) Prior to commencement of above ground construction works, details and locations of the parking spaces equipped with active electric vehicle charging points (EVCPs) and the passive EVCP provision shall be submitted to and approved in writing by the Local Planning Authority. At least 10 EVCPs, as outlined in TN05 – Response to Haringey Comments (Motion, dated: 29/04/2022), shall be provided. The details shall include:

- a) Location of active and passive charge points;
- b) Specification of charging equipment; and
- c) Operation/management strategy.

Thereafter, the approved EVCPs shall be retained, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To support the transition to low-carbon transport, in accordance with Policy T6 of the London Plan 2021 and Policy SP7 of the Haringey Local Plan 2017.

Delivery and Servicing Plan

- 8) Prior to commencement of above ground construction works, a final 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).

Thereafter, the development should operate in line with the final Delivery and Servicing Plan, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that delivery and servicing activities are adequately managed such that the local community, pedestrians, cyclists and other highway users experience minimal disruption and disturbance, in accordance with Policy T7 of the London Plan 2021.

Construction Environmental Management Plan

- 9) Prior to commencement of development, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority.
- a) The CEMP shall include a Construction Logistics Plan (CLP) and a Air Quality & Dust Management Plan (AQDMP).
 - b) The CEMP shall provide details of how construction works are to be undertaken and shall include:
 - i. A construction method statement which identifies the stages and details of how works will be undertaken;
 - ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 0800 to 1800 Monday to Friday and 0800 to 1300 on Saturdays with no working on Sundays or Bank Holidays;
 - iii. Details of plant and machinery to be used during demolition/construction works;
 - iv. Details of an unexploded ordnance survey;
 - v. Details of the waste management strategy;
 - vi. Details of community engagement arrangements;
 - vii. Details of any acoustic hoarding;
 - viii. A temporary drainage strategy and performance specification to control surface water runoff and a Pollution Prevention Plan (in accordance with Environment Agency guidance);
 - ix. Details of external lighting; and,
 - x. Details of any other standard environmental management and control measures to be implemented.
 - c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:
 - i. Monitoring and joint working arrangements, where appropriate;
 - ii. Site access and car parking arrangements;
 - iii. Delivery booking systems;
 - iv. Agreed routes to/from the site;
 - v. Timing of deliveries to, and removals from, the site (to avoid peak times, as agreed with Highways Authority, 0700 to 0900 and 1600 to 1800, where possible);
 - vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the site during the demolition and construction phase; and
 - vii. Joint arrangements with neighbouring developers for staff parking, lorry parking and consolidation of facilities such as concrete batching.
 - d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:
 - i. Mitigation measures to manage and minimise construction dust emissions during works;
 - ii. Details confirming the plot has been registered at <http://nrmm.london>;
 - iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority inspection;

- iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);
- v. A Dust Risk Assessment for the works; and
- vi. Lorry parking details, in joint arrangement where appropriate.

The development should be carried out in accordance with the approved details. Additionally, the site or contractor company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.

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

Contamination

10) Before development commences other than for investigative work:

- a) Using the information already submitted in the Phase II Ground Investigation Report (reference R-GI-23675-01-02, Revision 02, prepared by JPP Geotechnical & Environmental Ltd, dated: December 2021), chemical analyses on samples of the near surface soil, in order to determine whether any contaminants are present in the un-investigated part of the site and to provide an assessment of classification for waste disposal purposes, shall be conducted. 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 any additional remediation requirements where necessary.
- b) Prior to the remediation being carried out on site, the risk assessment and refined Conceptual Model, along with the site investigation report, shall be submitted to and approved in writing by the Local Planning Authority.
- c) Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and;
- d) 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, in accordance with Polciy DM23 of The Development Management DPD 2017.

Unexpected Contamination

- 11) 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.**

Reason: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources, in accordance with Policy DM23 of The Development Management DPD 2017.

BREEAM Certificate

- 12) a) Prior to commencement of above ground construction works, a design stage accreditation certificate(s) for every type of non-residential category must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”. 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) Within six months after completing construction, 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 Policies SI2, SI3 and SI4 of the London Plan 2021 and Policy SP4 of the Haringey Local Plan 2017.

Energy Strategy

- 13) The development hereby approved shall be constructed in accordance with the Energy Statement (Energy Report, dated: 18 March 2022, Issue 3) delivering a minimum 89% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, temporary communal heating solution with measures in place to allow for a future connection to the Decentralised Energy Network and a minimum 240kWp solar photovoltaic (PV) array.
- a) Prior to commencement of above ground construction works, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This shall include:
- i. Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;

- ii. Confirmation of the necessary fabric efficiencies to achieve a minimum 26% reduction in SAP10 carbon factors, including details to reduce thermal bridging;
- iii. Details of the specification, efficiency, layout and capacity of temporary gas boiler plant and thermal store;
- iv. Details of the solar 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);
- v. A metering strategy.

The development shall be carried out strictly in accordance with the approved details prior to first operation, and the details 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 approved solar PV capacity and monitoring equipment 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.
- 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 Policy SI2 of the London Plan 2021 and Policy SP4 of the Haringey Local Plan 2017.

DEN Connection

- 14)** Prior to commencement of above ground construction works, details relating to the future connection to the DEN shall be submitted to and approved by the Local Planning Authority. This shall include:
- a) Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);
 - b) Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.
 - c) Detail of the pipe design, pipe sizes and lengths (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;

- d) 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 should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;
- e) Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing services, and plans and sections showing the route for three 100mm diameter communications ducts;
- f) Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;
- g) 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; and
- h) Details of a future pipework route from the temporary boiler 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 Policy SI2 of the London Plan 2021 and Policy SP4 of the Haringey Local Plan 2017.

Overheating

- 15)** Prior to first occupation of the development, the following overheating measures, outlined in the Ventilation & Overheating Strategy (David Webb Associates Ltd, dated: 28/04/2022, Rev 03) shall be installed:
- a) Natural ventilation or fan-assisted natural ventilation (through low-energy wall or roof fans);
 - b) Mechanical ventilation for wet areas; and
 - c) Glazing g-value of 0.56 or lower.

No active cooling shall be installed, unless otherwise agreed in writing by the Local Planning Authority. Thereafter, the above overheating measures shall be retained.

Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with Policy SI4 of the London Plan 2021 and Policy SP4 of the Haringey Local Plan 2017.

Biodiversity Net Gain

- 16)** Prior to first occupation of the development, the biodiversity enhancement measures outlined in Section 5.3 of the Ecological Assessment (The Ecology Practice, dated: December 2021) shall be fully provided. These measures shall

thereafter be retained, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To secure biodiversity net gains on the site, in accordance with Policy G6 of the London Plan 2021.

External Lighting

- 17)** Prior to first occupation of the development, full details of all proposed external lighting shall be 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.

Secured by Design Accreditation

- 18)** Prior to the commencement of above ground works to each building or part of a building, details shall be submitted to and approved in writing by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. The development shall only be carried out in accordance with the approved details.

Reason: To ensure a safe and secure development and reduce crime.

Secured by Design Certification

- 19)** Prior to the first occupation of each building or part of a building, 'Secured by Design' certification shall be obtained for such building or part of such building.

Reason: To ensure a safe and secure development and reduce crime

Parking Management Plan

- 20)** Prior to the first occupation of the development, a final Parking Management Plan shall be submitted to and approved in writing by the Local Planning Authority. This plan should detail 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/servicing vehicles entering the site.

Reason: To ensure that functional car parking spaces are available for the proposed use.

Cycle Parking

- 21)** Prior to the first occupation of the development, details of the location and type of secure and covered cycle parking facilities shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied until a minimum of 86 cycle parking spaces for users of the development and existing Florentia Clothing Village, have been installed in accordance with the approved details. Such spaces shall be retained thereafter for this use only.

Reason: To promote sustainable modes of transport in accordance with Policy T5 of the London Plan 2021 and Policy SP7 of the Haringey Local Plan 2017.

Internal Route Safety Measures

- 22)** Prior to the first occupation of the development, full details of the safety measures in place within the site to limit the possibility of conflict between vehicles and pedestrians shall be submitted to and approved in writing by the Local Planning Authority. Such details shall include:
- a) the location and appearance of painted pedestrian routes;
 - b) the location and type of speed limit signage; and
 - c) any other safety measures.

These measures shall thereafter be retained, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure a safe development and to reduce the risk of a conflict between vehicles and pedestrians.

Removal of Redundant Accesses

- 23)** The commercial units hereby approved shall not be occupied until an agreement is in place with the Highway Authority to remove the three redundant vehicle crossovers into the site from Vale Road and reinstate the footway and kerbs.

Reason: To remove potential points of conflicts between vehicles and pedestrians and to secure the benefits to highways safety, in accordance with Policy SP7 of the Haringey Local Plan 2017.

Planting of Street Trees

- 24)** The commercial units hereby approved shall not be occupied until an agreement is in place with the Council for the planting of street trees on Vale Road.

Reason: To secure the benefits to the character and appearance of the street scene, in accordance with Policy D3 of the London Plan 2021, Policy SP11 of the Haringey Local Plan 2017 and Policy DM1 of the Development Management DPD 2017.

Noise (Plant)

- 25)**Noise emitted from plant and equipment in relation to the buildings shall not exceed a level 10dBA below the existing lowest LA90(10min) background noise level at any time when the plant is operating. The noise emitted shall be measured or predicted at 1.0m from the facade of the nearest neighbouring residential premises. The plant shall be serviced regularly in accordance with the manufacturer's instructions and as necessary to ensure that the requirements of the condition are maintained. If at any time the plant is determined by the Local Planning Authority to be failing to comply with this condition, it shall be switched off upon written instruction from the Local Planning Authority and not used again until it is able to comply.

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

Storage

- 26)**No goods or materials shall be permanently placed or stored in the yard area within the site, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In order to ensure the free flow of vehicles within and through the site.

Informatives

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 or Bank Holidays.

INFORMATIVE: Numbering

The new development will require numbering. The applicant should contact the Local Land Charges at least six weeks before the development is occupied (tel. 020 8489 3472) to arrange for the allocation of a suitable addresses.

INFORMATIVE: Asbestos

Prior to demolition of 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.

INFORMATIVE : Signage & Advertisement Consent

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: 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: Designing Out Crime Officer

The applicant must seek the continual advice of the Metropolitan Police Service (MPS) Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.

Appendix 2: Plans and Images

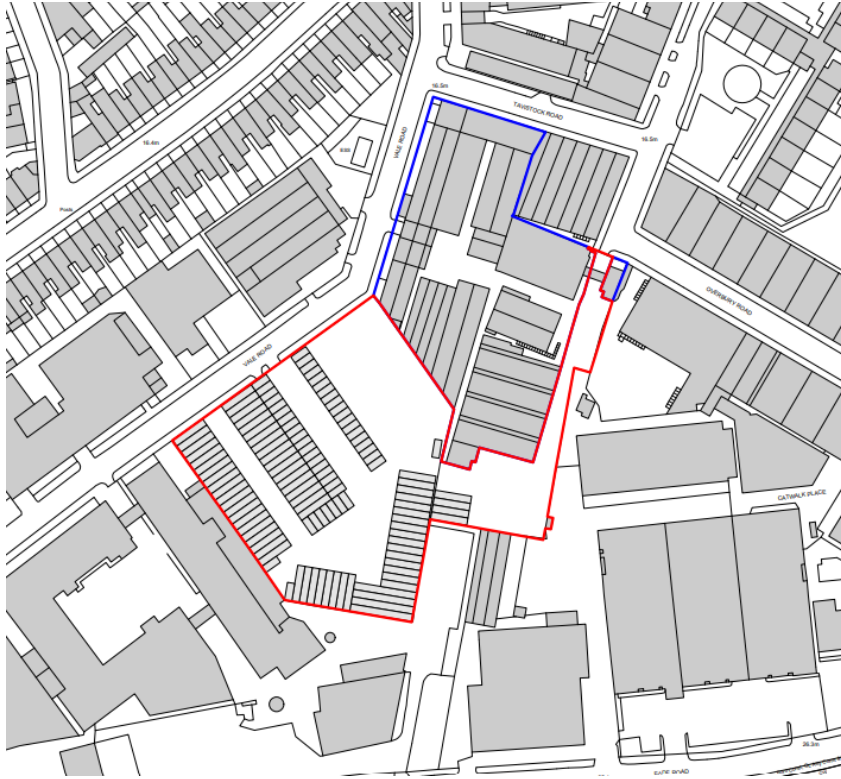


Figure 7: Site Location Plan



Figure 8: Proposed Ground Floor Plan



Figure 9: Proposed Mezzanine Floor Plan



Figure 10: Proposed First Floor Plan

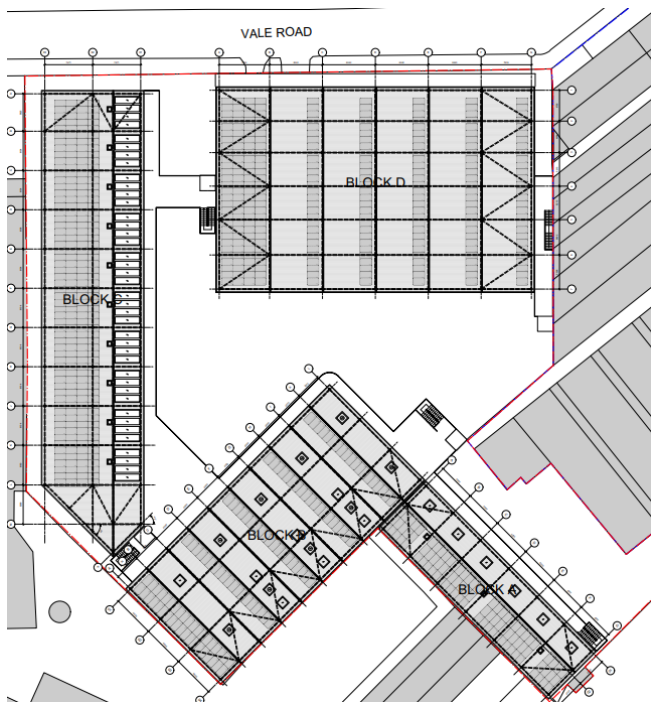


Figure 11: Proposed Roof Plan

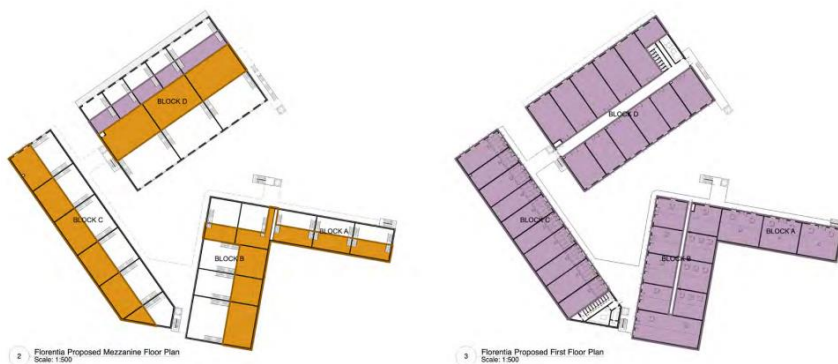


Figure 12: Use Class Layout

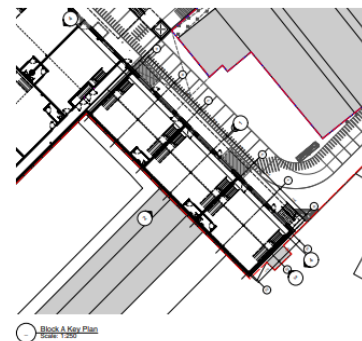
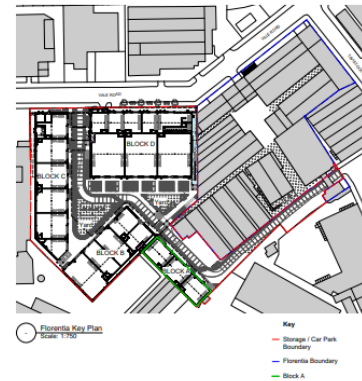
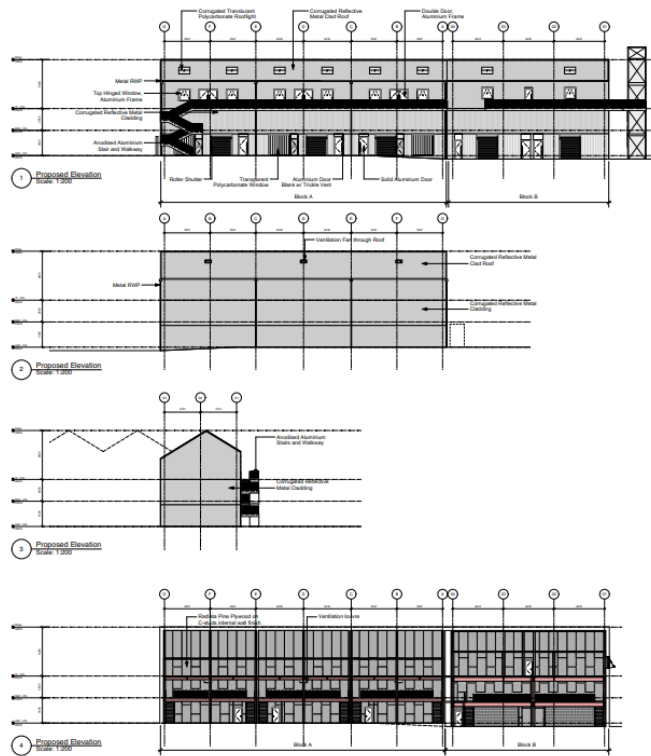


Figure 13: Block A – Proposed Elevations

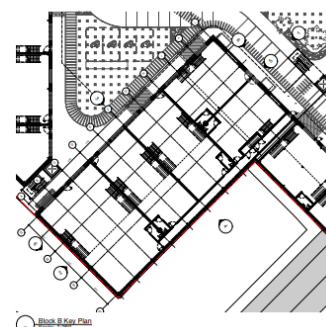
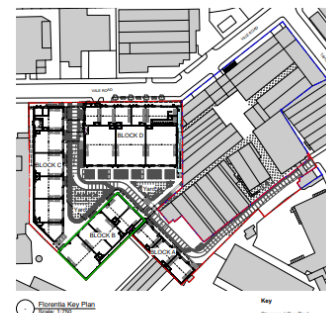
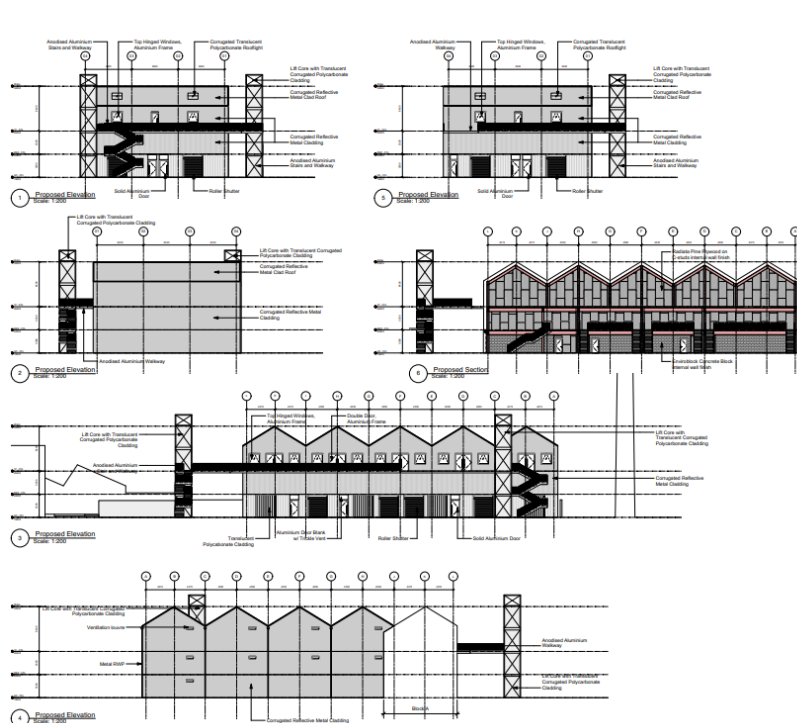


Figure 14: Block B – Proposed Elevations

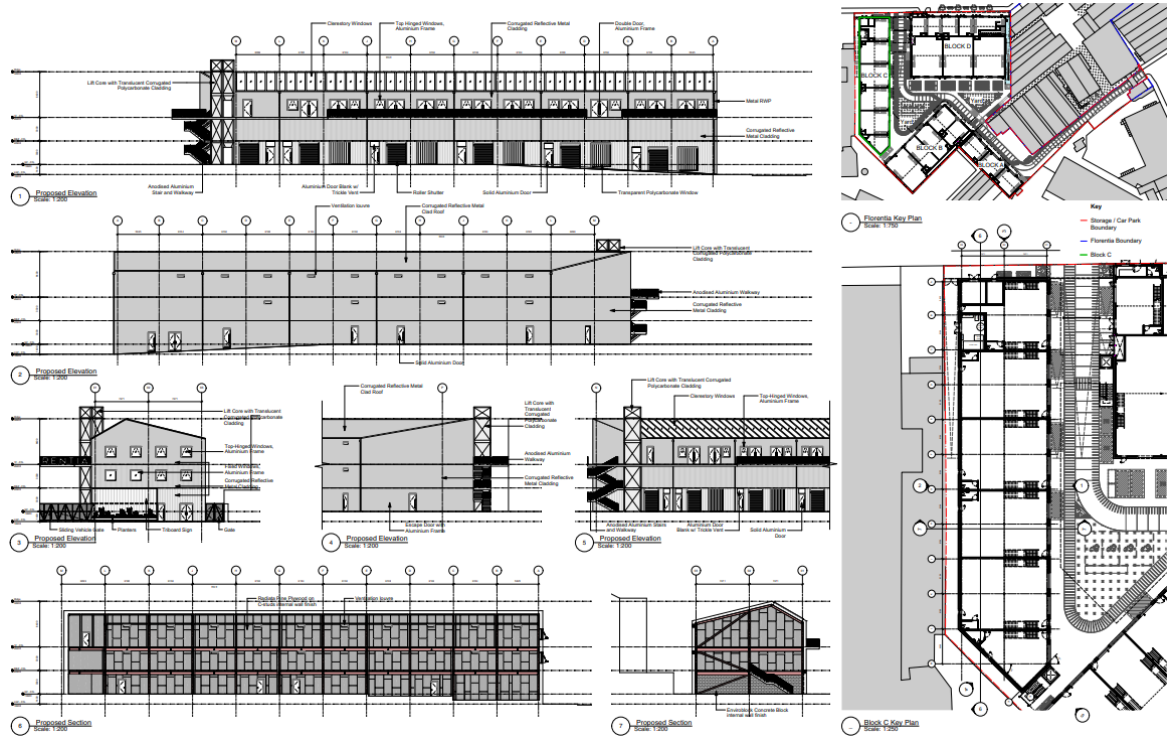


Figure 15: Block C – Proposed Elevations

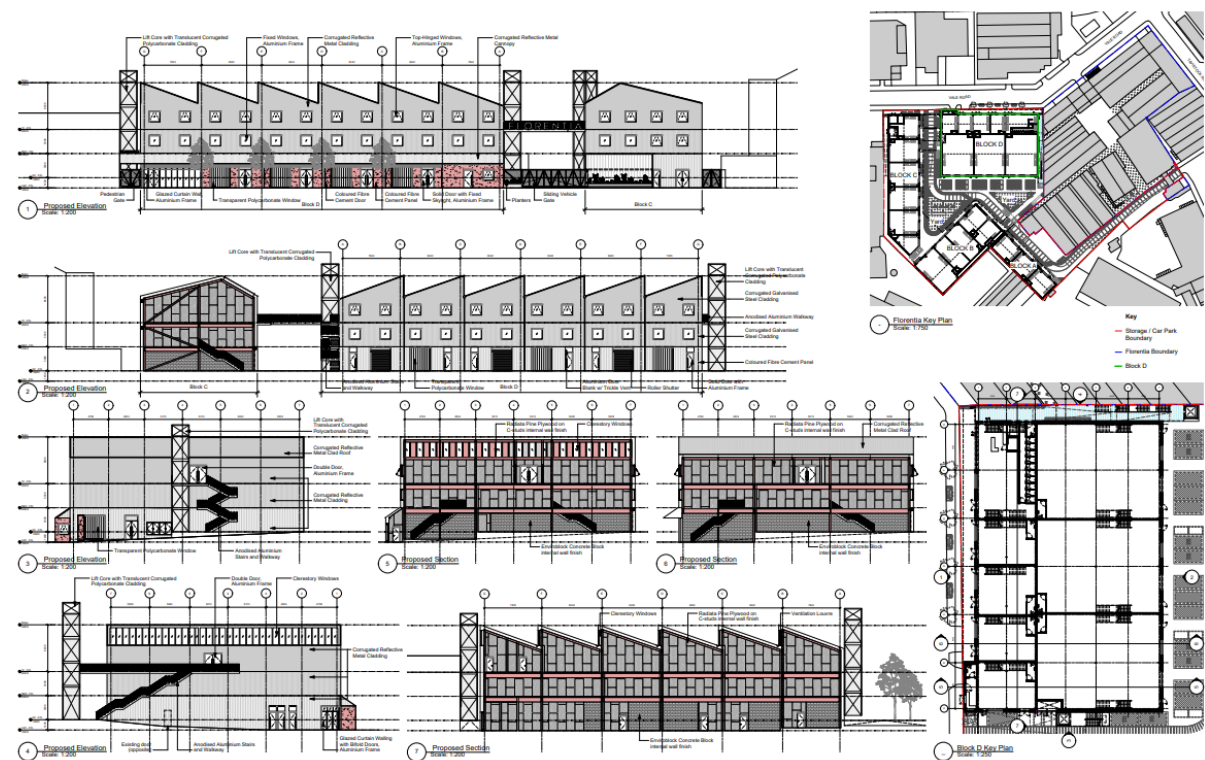


Figure 16: Block D – Proposed Elevations



Figure 17: Street Scene Image – Vale Road



Figure 18: Overview Landscaping Plan

Appendix 3: Consultation Responses – Internal and External Consultees and Representations

Stakeholder	Question/Comment	Response																					
INTERNAL																							
Carbon Management	<p>Energy The development achieves a reduction of 89% carbon dioxide emissions on site with SAP10 carbon factors, which is supported. The GLA have advised that SAP10 carbon factors are the most appropriate for developments connecting to the DEN in the future, in preparation for Building Regulations Part L 2021 coming into effect. Previously a 108% reduction in emissions was reported with SAP2012 carbon factors.</p> <p>Energy - Overall The carbon offset contribution is estimated at £23,370 + 10% management fee.</p> <table border="1"> <thead> <tr> <th>(SAP10 carbon factors)</th><th>tCO₂</th><th>%</th></tr> </thead> <tbody> <tr> <td>Baseline emissions</td><td>76.7</td><td></td></tr> <tr> <td>Be Lean savings</td><td>20</td><td>26%</td></tr> <tr> <td>Be Clean savings</td><td>-1.3</td><td>-2%</td></tr> <tr> <td>Be Green savings</td><td>49.8</td><td>65%</td></tr> <tr> <td>Cumulative savings</td><td>68.4</td><td>89%</td></tr> <tr> <td>Carbon shortfall to offset (tCO₂)</td><td>8.2</td><td></td></tr> </tbody> </table> <p>The unregulated load of electricity is calculated at 180,821 kWh/year.</p> <p>Energy – Be Clean The applicant has confirmed that a Building Control notice was obtained to enable this scheme to be signed off under Building Regulations Part L 2013. This will allow for the temporary communal gas-fired system to be implemented before a DEN connection.</p> <p>Further documents submitted show an indicative plant area with buffer vessels to serve a base heating load estimated at 253 kW, and an additional capacity of 200 kW for future expansion.</p> <p>The DEN connection scenario has been calculated with a carbon factor of 0.0726 kgCO₂e/kWh, which is based on 92% heat demand to be met by waste from heat power station and 8% from 90% efficient gas boilers. This shows a 102% carbon reduction on site with SAP10 carbon factors for the remaining energy sources. An updated carbon factor may need to be used at the Energy Plan stage to reflect the updated DEN delivery plans.</p>	(SAP10 carbon factors)	tCO ₂	%	Baseline emissions	76.7		Be Lean savings	20	26%	Be Clean savings	-1.3	-2%	Be Green savings	49.8	65%	Cumulative savings	68.4	89%	Carbon shortfall to offset (tCO₂)	8.2		<p>Support for reduction in carbon emissions noted.</p> <p>Carbon offset contribution noted. This should be considered through a Legal Agreement.</p>
(SAP10 carbon factors)	tCO ₂	%																					
Baseline emissions	76.7																						
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Be Clean savings	-1.3	-2%																					
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Carbon shortfall to offset (tCO₂)	8.2																						

Stakeholder	Question/Comment	Response																									
	<p>Site plans to show the connection point, plant room layout and plant room schematic have been included in the appendices.</p> <p>Energy – Be Green The revised report has reduced the solar photovoltaic capacity from 265 kWp to 240 kWp. The roof space should be maximised to deliver the highest amount of renewable energy generated on site.</p> <p>Energy – Carbon Offset Contribution A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built.</p> <p>The applicant should present two carbon reduction table scenarios:</p> <ul style="list-style-type: none">• Scenario 1: Connection to the DEN scenario (residual tCO₂ over 30 years)• Scenario 2: Communal heating and gas boilers (residual tCO₂ over 30 years) <p>Two carbon offset payments will be calculated. The carbon offset contribution for scenario 1 will be due at the commencement of development and the difference in the offset contribution between the first and second scenarios will be deferred and indexed accordingly.</p> <ol style="list-style-type: none">1. Payment for the residual emissions in the DEN scenario (Scenario 1) would be due at commencement of development.2. A deferred carbon offset contribution is calculated through the difference in the offset contribution: Scenario 2 – Scenario 1 = Deferred Payment.3. If, after 10 years the development has <u>not</u> connected to the DEN, the deferred payment (+ indexation) is due.4. If, after 10 years the development has connected to the DEN, the deferred payment would not be due but this amount would be available as a connection charge to the DEN. <table><tr><th></th><th colspan="2">Site-wide heating solution with gas boiler</th><th colspan="2">Future DEN connection (energy from waste)</th></tr><tr><th>(SAP10 carbon factors)</th><th>tCO₂</th><th>tCO₂</th><th>%</th><th>%</th></tr><tr><td>Baseline emissions</td><td>76.7</td><td></td><td>76.7</td><td></td></tr><tr><td>Total cumulative savings</td><td>68.4</td><td>89%</td><td>-2.7</td><td>102%</td></tr><tr><td>Shortfall in emissions to offset</td><td>8.2</td><td></td><td>0</td><td></td></tr></table>		Site-wide heating solution with gas boiler		Future DEN connection (energy from waste)		(SAP10 carbon factors)	tCO ₂	tCO ₂	%	%	Baseline emissions	76.7		76.7		Total cumulative savings	68.4	89%	-2.7	102%	Shortfall in emissions to offset	8.2		0		<p>Requirement to maximise roof space noted. Further details should be secured via condition.</p>
	Site-wide heating solution with gas boiler		Future DEN connection (energy from waste)																								
(SAP10 carbon factors)	tCO ₂	tCO ₂	%	%																							
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Shortfall in emissions to offset	8.2		0																								

Stakeholder	Question/Comment			Response										
	Carbon offset contribution	8.2 tCO ₂ x £95 x 30 years = £23,370	£0	Confirmation of acceptable overheating strategy noted. Urban greening factor addressed in report.										
	Carbon Offsetting Contribution payment due at commencement of development		£0 (TBC at Energy Plan Stage)											
	Deferred Carbon Offsetting Contribution (+indexation) payment due if not connecting to the DEN		£23,370 - £0 = £23,370											
	Overheating One additional unit has been modelled (Unit D17). These represent the workspace typologies across the development. The report confirms that there is no evidence mechanical cooling would be necessary. It is expected that future tenants would consider what additional ventilation requirements they may have to suit their use of the space. All units pass the mandatory DSY1 2020s weather file. The units marginally fail the more extreme weather files. Further ventilation may be added to the units, with sufficient space available on the facades. Night-time purge ventilation may also be used (not currently included).													
	<table><tr><th></th><th>Number of spaces pass TM52</th></tr><tr><td>DSY1 2020s</td><td>6/6</td></tr><tr><td>DSY2 2020s</td><td>6/6</td></tr><tr><td>DSY3 2020s</td><td>1/6</td></tr><tr><td>DSY1 2050s</td><td>5/6</td></tr></table>					Number of spaces pass TM52	DSY1 2020s	6/6	DSY2 2020s	6/6	DSY3 2020s	1/6	DSY1 2050s	5/6
		Number of spaces pass TM52												
DSY1 2020s	6/6													
DSY2 2020s	6/6													
DSY3 2020s	1/6													
DSY1 2050s	5/6													
The overheating strategy is considered acceptable.														
Sustainability - Urban Greening Factor An UGF of only 0.01 can be achieved on this site, which falls short of the target of 0.3 for non-residential developments.														
Pollution	Having considered all the relevant supportive information on pollution especially the Energy Statement with reference J01880 Issue 2 prepared by Energy Report Ltd dated 9th December 2021, Air Quality Assessment Report with reference J10/12876A/10/1/F2 prepared by Air Quality Consultants Ltd dated 8th December 2021 taken note of sections 5 (Baseline Conditions), 6 (Construction Phase Impact			Comments noted and addressed in report. Recommended conditions have been										

Stakeholder	Question/Comment	Response
	<p>Assessment), 7 (Operational Phase Impact Assessment), 8 (Air Quality Neutral), 9 (Mitigation), 10 (Conclusions) and Phase II Ground Investigation Report with reference R-GI – 23675 – 01 – 02 Revision 02 prepared by JPP Geotechnical Ltd dated December 2021 taken note of sections 5 (Ground Investigation), 6 (Ground Conditions), 8 (Contamination Assessment), 9 (Preliminary Conceptual Model), 10 (Generic Quantitative Assessment) and 13 (Summary and Recommendations), we have no objection to the proposed development.</p> <p>However, our recommendations below are based on the need for installing an ultra – low gas fired boiler of 24mg/kwh NOx at the energy centre and bearing in mind that whilst the TPH concentrations recorded was deemed to be as a result of volatile or liquid contaminants in HD04 as alluded in section 10.4.2 of the Phase II Ground Investigation Report with reference R-GI – 23675 – 01 – 02 Revision 02 prepared by JPP Geotechnical Ltd dated December 2021, we wouldn't consider completion of two rounds of gas monitoring has been sufficient to make an inform decision on the site gas characteristics been 1 as stated in in sections 10.6.1 and 10.6.2 of the report. Moreover, irrespective of the site proposed end use (industrial), it is proposed there is a need for suitable capping for elevated lead exceedance as noted in section 10.7.3 and 10.7.4 of the report with the possibility of a barrier water pipe due to some elevated concentrations of chemical contaminants as stated in section 10.8.1 and the existence of an underground tanks which had not been encountered during the current investigation as stated in section 10.9.4. Therefore, the idea of the applicant consultant stating there wouldn't be any need for any land remediation work for an industrial site with incomplete site investigation, communal yard with soft landscaping and planting is not acceptable.</p> <p>For the above reasons, please be advise that whilst we have no objection to the proposed development in respect to air quality and land contamination, the following planning conditions and informative are recommend should planning permission be granted.</p>	<p>considered and included where relevant.</p>
Transportation	<p>This site is located to the south eastern side of Vale Road, within the Harringay Warehouse district, adjacent to the Florentia Clothing village site. It has a PTAL value</p>	<p>Conditions and obligations</p>

Stakeholder	Question/Comment	Response
	<p>of 2 which is considered 'poor' accessibility to public transport services. 4 bus services are accessible within 6 to 8 minutes walk. Seven Sisters Station is 17 minutes walk away, which is outside of the walk distances included for the calculation of the PTAL value (12 minutes/960m). Harringay Green Lanes Station is just outside of this distance at 13 minutes walk away. The site is within the Green Lanes 'B' CPZ, which has operating hours of 8am to 6.30pm Monday to Friday.</p> <p>Existing arrangements At present, the site is set up as a storage facility with a mix of open space and shipping containers. There are apparently 130 self storage units in use at the site. There are three crossovers accessing the site off Vale Road, although it appears only one is in active use. There is existing vehicle access into the site from Tavistock/Overbury Road to the northern end of the site.</p> <p>Transportation considerations A Transportation Assessment (TA) accompanies this application. This does include the appropriate topics for consideration of this application, and comments follow below.</p> <p>Proposed access arrangements It is proposed for access to the Site for pedestrians, cyclists and vehicles to be from Vale Road. The proposed pedestrian access is located to the north east side of the site, with the vehicular entrance situated to the north west. At present there are four crossovers off Vale Road accessing the overall Florentia site. It appears with these proposals that only two are retained, so there will be Highways works required to reinstate kerbs and footway to the appropriate height. The applicant will need to enter into the appropriate Highways Act agreement and meet all of the associated costs. With respect to vehicle access, the proposals comprise of a one-way delivery and servicing route, from Vale Road through Florentia Village (both existing and proposed extension), exiting at Overbury Road. This will enable vehicles to enter and exit the Site in forward gear. The existing Florentia Clothing Village will also have use of this arrangement plus retain their existing vehicle access at Vale Road. Whilst there are a</p>	<p>recommended have been reviewed and included where relevant.</p> <p>Latest comments from Transportation have recommended a condition requiring details of safety measures within the site, so to ensure that the internal route would be safe. This condition forms part of this recommendation.</p>

Stakeholder	Question/Comment	Response
	<p>number of drawings within the application for this arrangement, there do not appear to be any that show widths/dimensions of the access way and the associated walking route/footways that will be used by employees and visitors, and will be used to move waste to the internal collection points. Swept path plots have been provided within the TA for visiting refuse vehicles and larger delivery vehicles (17t trucks) and smaller rigids. These do appear to show that at corners the swept path takes up the full width of the access way. This does cause concerns with regards to safety of pedestrians and cyclists that may be using the walk routes internally. More information is required, including dimensions of the access way, the foot route and at key points where there may be potential conflicts. A description of how potential safety issues can be managed or mitigated will be required, including localised widening if appropriate. Transportation will not be able to fully comment on the proposal without sight of this information. It is also noted within the Design and Access statement that a Fire Appliance is able to access the site internally via the access route, the emergency services should however comment on the proposals.</p> <p>Parking stress survey A Parking Stress Survey (PSS) has been carried out and presented within the TA. This recorded existing levels of parking in the locality of the site, within a 500m walk of it as required by the Lambeth Methodology. This PSS recorded stresses of 46% in the streets local to the site, during the daytime periods (appropriate given the employment considerations/function of the development). In particular 64 spaces were recorded as available within Vale Road out of the 123 spaces recorded. For the whole survey area 388 spaces were recorded as available out of the 716 in place. The parking stress survey recorded 'observed spaces' or 5m or greater when the surveys were undertaken. At pre application stage the applicant was advised that a 6m car length iteration/sensitivity should also be included, this has not been done. This was considered appropriate to reflect the potential for visiting vans and larger cars and driver behaviour. Given the PSS did record considerable spare capacity, and there is adequate car parking proposed within the site, in this instance, it is not considered problematical that a 6m sensitivity has not been included.</p>	<p>Support noted.</p>

Stakeholder	Question/Comment	Response
	<p>Parking considerations</p> <p>At present, there is an area for contract parking on the site, which accommodates 40 spaces. This is apparently used by non employees as well as employees working at the site. In addition to this there are 37 car parking spaces plus 2 delivery vehicle bays within the site. This makes a total of 79 spaces at the existing site. All vehicle and cycle parking spaces with this redevelopment are to be provided at ground floor level, accessed via Vale Road. A total of 53 vehicle parking spaces (including 2 accessible parking spaces) and 86 cycle parking spaces are proposed across the whole Site. This is a site wide reduction of 26 spaces in total however some of the existing onsite parking is not utilised by employees or visitors. With respect to London Plan Parking standards, for outer London, development such as these default to the standards for office parking which are up to 1 space per 100 sqm. Based on this the maximum provision would be 93 spaces for the new floor area. The proposed provision is less than this maxima and the proposed allocation/management of them is discussed below. The 53 car parking spaces are for the entirety of the Florentia Village site. On the whole these spaces are effectively proposed as a mix of retained (and reduced) parking for existing units/employees (19 spaces), plus operational parking spaces for vehicle trips to and from the units at the site to delivery and collect materials and the like. These new spaces are not intended for use as workplace commuter parking spaces. An element of them will be bookable for day visitors to the site associated with businesses operating there. Two blue badge spaces are included, the London Plan requires 5% minimum blue badge provision marked up from the outset, so three spaces should be provided out of the 53. An 'Operational Parking Management Plan' has been produced for the day to day management of the parking available at the site. The intended allocation/breakdown is shown below in table 5.3. extracted from the TA;</p> <p>Overall, with respect to existing and proposed parking provision, there will be a reduction in provision for existing employees and the remainder of the spaces will be for operational purposes. The provision is lower than the London Plan maximum, and will be reduced per employee compared to present, which should reduce mode shares for those working at the site that come by private vehicle. The existing parking</p>	<p>Support noted for reduced parking provision.</p>

Stakeholder	Question/Comment	Response
	<p>stresses recorded around the site do not indicate that local streets are stressed, so any additional parking demands beyond those catered for by on site parking are not expected to be problematical. It is suggested that the development be formalised as permit free with respect to the issue of Business Permits to further discourage vehicle trips to and from the site.</p> <p>Electric Vehicle Charging points The London Plan requires provision of 20% active and 80% passive spaces for vehicle charging. The applicant has included proposals for 8 active charging spaces. This isn't 20% of the 53 spaces, 11 should be provided as active spaces. With respect to the charger arrangements, the applicant will need to carefully consider future operational needs of the occupiers at the site and how this will impact on what charging capacity should be installed on site. They should consider how far and how often vehicles need to drive as this will reflect the charging schedule, such as whether standard overnight chargers will be appropriate or faster chargers for vehicles covering greater distances perhaps. The applicant will need to provide their proposed regime for charger provision and this can be covered by condition.</p> <p>Trip generation As commented earlier, there will be an increase in expected/predicted employee numbers from 130 to 240. The TA includes a trip generation derivation along with mode shares, based on surveyed information from employees collated during 2021. The existing mode shares and trip information from the employee survey shows healthy walking and cycling mode shares, and the predictions for both the future existing employees and new floor space show improved mode shares for walking and cycling to reflect the reductions in parking ratio compared to present that will be delivered by this development. The predicted number of car/vehicle arrivals and departures appears to indicate that external parking demands are unlikely. Delivery and servicing All delivery and servicing operations will take place off -street and vehicles will enter and exit the site in a forward gear. The site's internal route has been designed to accommodate large vehicles navigating within the site. The largest vehicle expected to be on site is a 10.5m refuse vehicle. Comments have been made</p>	<p>Details of electric charging secured via a condition.</p> <p>Again noted that details of safety measures within the site will be secured via condition.</p>

Stakeholder	Question/Comment	Response
	<p>earlier in this response with regards the proposed internal service and access routes, and more information is required with respect to this. Refuse and recycling It is noted that there will be single collection point within the development, from the internal access route, close to the Overbury Road exit. Whilst off street collections for recycling and refuse are welcomed, there are the queries raised earlier in this response with regards to the environment and space available for pedestrians whilst larger service vehicles are accessing the site.</p> <p>Delivery and servicing All delivery and servicing operations will take place off -street and vehicles will enter and exit the site in a forward gear. The site's internal route has been designed to accommodate large vehicles navigating within the site. The largest vehicle expected to be on site is a 10.5m refuse vehicle. Comments have been made earlier in this response with regards the proposed internal service and access routes, and more information is required with respect to this.</p> <p>Refuse and recycling It is noted that there will be single collection point within the development, from the internal access route, close to the Overbury Road exit. Whilst off street collections for recycling and refuse are welcomed, there are the queries raised earlier in this response with regards to the environment and space available for pedestrians whilst larger service vehicles are accessing the site. With regards to the storage and collection arrangements, the Council's internal Waste team will need to comment on the suitability and acceptability of the developer's proposals.</p> <p>Cycle parking 76 long stay cycle parking spaces are proposed, along with 10 No. short stay. This exceeds London Plan numerical requirements. It is noted that two locations are proposed for the Long Stay cycle parking. 2 of the 76 spaces are to be for larger cargo cycles too. Long stay cycle parking is shown indicatively in two locations, one being close to the existing main Florentia access off Vale Road, and the remainder within the site including the short stay and larger cycle parking. There doesn't appear to be</p>	<p>Delivery and serving arrangements are considered appropriate.</p> <p>Waste Team has confirmed that arrangements relating to waste and recycling collection are acceptable.</p> <p>Details of cycle parking to be secured via condition.</p>

Stakeholder	Question/Comment	Response
	<p>any details provided showing the dimensional details, not the systems intended to be used for long stay storage and how parked cycles will be kept secure and weatherproof. This information is very important and should have accompanied this application, to demonstrate that the cycle parking arrangements proposed are of high quality, attractive to employees and visitors and are designed and laid out to meet the requirements of the London Cycle Design Standards as produced by TfL. The applicant should provide this information prior to any planning decision. High quality cycle parking is a contributory factor towards encouraging the uptake of cycling and achieving modal change towards active and sustainable travel modes.</p> <p>Motorcycle parking 10 motorcycle parking spaces are included in the proposals, located within the site. It is commented in the TA that there are 3 provided at present. There isn't a rationale for this provision, it doesn't appear to be backed up by the travel survey data of existing employees that has been used in the trip generation derivation.</p> <p>Travel Plan A draft of a Framework Travel Plan is included within the appendices to the TA. Overall, the proposed structure, scope and objectives appear sound. It is suggested that monitoring of usage of the cycle parking provided is included and a worked up final draft and implementation of a travel Plan can be covered by condition.</p> <p>Contribution towards improve access by sustainable and active travel modes to the site Given the uplift in employee numbers that would result from the implementation of this development, and to build on the already positive mode shares for active travel modes, it would be appropriate for this development to make a contribution towards improving facilities for active travel users that access the site. This could be either for specific active travel schemes and/or towards emerging LTN works in the locality and which will benefit the development and those travelling to it. The appropriate contribution can be determined.</p>	<p>Travel Plan to be secured via the legal agreement.</p>

Stakeholder	Question/Comment	Response
	<p>Construction phase</p> <p>A comprehensive draft of a Construction Logistics Plan has been included with the application. This provide much of the information that will be required for a final pre commencement plan. The applicant will need to liaise with the Council's Network Managers with respect to their CLP to ensure any requirements they have will be incorporated. The CLP can then be finalised, and covered by a pre commencement condition.</p> <p>Summary</p> <p>This application is for redevelopment of part of the Florentia site to add another 9363 sqm of floor space at the site. The predicted increase in employees working there will be from 130 to 240. In order to finalise transportation comments, more information is required, as described within this response, in particular with regards to the following aspects of the application;</p> <ul style="list-style-type: none"> • Internal access arrangements • Cycle parking details • Motorcycle parking regime • Appropriate number of blue badge parking and charging point spaces to meet London Plan requirements <p>Should the required information relating to the above points be satisfactorily provided, and planning colleagues are minded to grant permission, then the following conditions and S106 items will be appropriate;</p> <p>Conditions</p> <ul style="list-style-type: none"> • Parking Management Plan • Cycle parking details (if not fully provided) • Delivery and servicing plan • Construction Logistics Plan • Electric vehicle charging points and appropriate charger provision 	

Stakeholder	Question/Comment	Response
	<p>It is noted that drafts of most of the above have been provided in the application and the conditions relate to provision of the final versions.</p> <p>S106 items</p> <ul style="list-style-type: none"> • Framework travel plan and monitoring fee • Sustainable transport/active travel contribution • Section 278 agreement for highways works • Business permit free development <p>June 2022</p> <p>I still consider the internal access arrangements quite tight, with the swept path plots showing in places larger vehicles (refuse vehicle and delivery trucks) getting quite close to and overrunning the pedestrian walkway particularly at bends. the applicant has provided a commentary on this, and suggested that the environment along this shared pedestrian/vehicle access will be acceptable given there will be colouring to delineate the pedestrian passageways across the shared surface, and that refuse vehicle arrivals will eb timed for the quieter parts of the day. They have also suggested including 5mph roundels on the surface. It is suggested that a condition be applied for the applicant to provide details of the safety/access measures they have proposed, to enable a review of the proposed arrangements (to include the colouring. roundels, maybe even rumble strips or similar as well. Written commentary on how a safe access environment will be provided in terms of management of arriving/departing vehicles and internal measures would also be appropriate. with regards the cycle parking envisaged for the edge of the highway at Vale Road, long stay cycle parking needs to be fully weatherproof and sufficiently secure. This isn't referenced in TN07. There's no clarity over the system intended for use (semi vertical and vertical are shown and there is reference to stacking as well) and no dimensioned drawings. This applicant needs to revisit this to provide full details and an acceptable arrangement. Long stay cycle parking as commented should be sufficiently secure and fully weatherproof. Ideally it should also be able to be accessed without temporarily</p>	

Stakeholder	Question/Comment	Response
	blocking any footways. The applicant needs to revisit this and submit new details. This can be covered by a pre commencement condition.	
Waste Management	<p>Having reviewed this I am satisfied that this acknowledges all the main requirements to ensure waste can be managed effectively from this development in operation. While the capacity/number of bins is below what would be required for a week storage of waste, required when there are issues affecting business continuity for waste collection sector, the bins are within a contained yard and there would be no/minimal impact on the public highway and wider street scene.</p> <p>I am therefore happy to support this application.</p>	Support for application acknowledged.
EXTERNAL		
Metropolitan Designing Out Crime Officer	<p>Thank you for allowing us to comment on the above planning proposal. With reference to the above application we have discussed the development with the architect and have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>We have met with the project Architects to discuss Crime Prevention and Secured by Design (SBD) for the overall masterplan and have discussed concerns around counter terrorism & crowd control. The Architects have made mention in the Design and Access Statement with reference to design out crime or crime prevention and have stated that they will be working in close collaboration with DOCOs and CTAs to ensure that the developed is designed to reduce crime at detailed design stage. At this point it can be difficult to design out fully any issues identified. At best crime can</p>	<p>Lack of objection is noted. Recommended conditions have been adapted and included.</p> <p>The concerns outlined at Appendix 1 of the response are acknowledged. These concerns can be 'designed' out of the scheme through communication with the Designing out Crime Officer, and through achieving Secure by Design Accreditation.</p>

Stakeholder	Question/Comment	Response
	<p>only be mitigated against, as it does not fully reduce the opportunity of offences. Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can be easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p>Appendix 1: Concerns and Comments</p> <p>In summary we have overall site specific comments in relation to the following items which have been discussed with the architect. This list is not exhaustive and acts as initial observations on the masterplan based on the available plans from the architect and local authority planning portal.</p> <p>Site specific advice may change depending on further information provided or site limitations as the project develops:</p> <p>We had particular concerns about the following</p> <ul style="list-style-type: none"> • Permeability of the site – front and rear access and the side gates (a drop barrier is insufficient and is only there for access of vehicles, not to prevent unauthorised access to the site. • CCTV coverage – only 2 cameras • Lighting – does not seem adequate as you go deeper into the site, a lighting engineer needs to review the site and lux levels are to be provided <p>Gates</p> <ul style="list-style-type: none"> • Both entrances to the development should be gated for both vehicle and pedestrian access for off peak times. 	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Gates should be minimum of 2.1m in height and be accredited to LPS1175 SR, self closing, self-locking with fob access for unit leaseholders and audio visual access control for visitors (via security office of individual units). • There are some (what appear to be side gates) leading to the rest of the estate and the new square, these should be self closing, self locking unless used for service only <p>Doors</p> <ul style="list-style-type: none"> • Unit Door - Doors to all of the individual units are required to be LPS1175SR2 (or equivalent) or have an LPS1175 SR1 shutter in front of the door (2 layers of protection) • External doors – leading to a corridor of units or to areas of asset, such as plant room are required to be LPS1175SR2 (or equivalent). • Key locked door sets to the street should have an internal thumb turn for exit. • If louvre doors are used there should be a layer of steel mesh to the rear to prevent unauthorised access • The store should have motion sensor photo electric lighting within the store. <ul style="list-style-type: none"> o No signage externally which would provide opportunity for other building users or passers-by to dump their rubbish or fly tipping. <p>Water supply - Protection of any mains water supply should be implemented as well as a Lockshield bib-cock tap.</p> <p>Lighting</p> <ul style="list-style-type: none"> • Public realm lighting whether adopted highways/footpaths/private estate roads or car parks should meet BS 5489:2013 standard. • DOCOs will ask for a declaration of conformity by a competent lighting engineer. This will be demonstrated to at least ILP Level 3 or 4. Homes 2019 para 18.5 • Internal lighting to be photo-electric unless there is no natural light in corridors in which case photo-electric with sensor • Lux level ratings of between 25% - 40% should be achieved along with a colour rendering of 60ra (minimum) on the Colour Rendition Index – certification will be required. • The lighting should be a white uniform light with dusk-till-dawn functionality via 	

Stakeholder	Question/Comment	Response
	<p>photoelectric cell with a manual over ride.</p> <ul style="list-style-type: none"> • Bollard lighting should be avoided due to history of vandalism and ease of removing light by covering. • Up lighters and decorative lighting can be used but only in unison with columns providing the required standards of light for good clear facial recognition illumination. • All entrance areas should have dusk till dawn lighting. • Any unit elevation that contains a doorset, including back doors should have dusk till dawn lighting. • Directional lighting should be present along footpaths and routes to be used through the development. <p>CCTV: - there doesn't appear to be enough cameras covering the site</p> <ul style="list-style-type: none"> • Site specific risk assessment dictates the need for CCTV, which can be monitored by security • System conform to BS EN 62676: 2014 - video surveillance systems - and where applicable BS 7958: 2015 CCTV management and operation COP. • The requirements of the Information Commissioner's Office should also be followed. <p>As a result of issues arising elsewhere in the MPS, the Department of Legal Services have also agreed additional advice in relation to CCTV:</p> <ul style="list-style-type: none"> • The MPS recommends that any CCTV system should undergo regular maintenance checks to ensure that it is still fit for purpose. • These checks should be undertaken by a CCTV engineer from a reputable company accredited either by the National Security Inspectorate (NSI) or the Security Systems and Alarms Inspection Board (SSAIB). • This maintenance should include not just software upgrades but also simple cleaning of camera lenses and their housing, the correct functioning and positioning of cameras and the ongoing recording of images suitable for facial identification of an individual. • Footage should be preserved for a minimum of 30 days. • Any CCTV system that captures footage of public areas must comply with the regulations outlined by the Information Commissioner's Office. • Access to Police must be within a minimum of 24 hours and a maximum of 48 hours for evidential purposes. 	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Should be of good facial recognition and colour quality in both daylight and night vision. • Should be anti-vandal cameras and where potentially targeted could be within a reinforced shroud. • This will not stop a crime occurring and should not be a default to withdraw from providing security measures. • CCTV to be securely stored i.e. on a remote cloud system, or on locked and secured hard drive. • Appropriate signage should also be included highlighting its use. <p>Windows</p> <ul style="list-style-type: none"> • All easily accessible windows should be certificated to either PAS24:2016 P2A, STS204 Issue 3 2012, LPS1175 Issue 7:2010 Security Rating 1 or LPS 2081 Issue 1 Security Rating A and included an LPSSR1 shutter • Accessible windows includes any glass reached by climbing any number of floors via rain water pipes, balconies or via communal walkways (whether the walkway is accessed through a secure door or not). • It also includes any area which has a hand hold within three meters of the ground. <p>All easily accessible windows should have key operated locks. Where windows are required under Building Regulations to act as a fire escape route, the opening window must not have key operated locks.</p> <ul style="list-style-type: none"> • All ground floor and vulnerable windows must have a lockable window restrictor to prevent unauthorized access – however consideration needs to be given if the windows are escape windows. • Where curtain walling is proposed on the ground floor units the minimum standard that should be accepted is BS EN1627 RC3. <p>Cycle outdoors - They should be positioned so as not to provide climbing aids to other vulnerable areas.</p> <p>Alarms – Should be included for each unit</p> <ul style="list-style-type: none"> • For the purposes of SBD an alarm system only needs to meet BS EN 50131 which 	

Stakeholder	Question/Comment	Response
	<p>can include wireless systems. It is only if a police response is required that compliance to the other standards is needed. https://www.policesecuritysystems.com/images/downloads/ALARM_STANDARD_TECHNICAL_GUIDE_A4_web_2.pdf • System should be compliant with PD6662 (which allows for wired and wireless systems) PD662 is an insurance minimum and a requirement by NPCC security systems policy . https://www.policesecuritysystems.com/</p> <p>General Cycle Storage – We recommend that there should be 3 points of locking for the bikes and signage for residents advising to lock their bikes appropriately. • The bike store should not be advertised from the outside to further deter opportunistic crime and access should only be provided to those who register with the Managing Agency. • Bike stands should have three points of locking and signage put up advising people to lock them securely. • External signage should not advertise the usage of this space to try and reduce opportunistic theft. • External cycle racks should be positioned to avoid usage as seating or located.</p> <p>Pathways/Walkways – As the concept of the design is to provide safe spaces for people to walk and cycle at all times, it will be important to ensure all pathways allow good visibility, are wide, are a straight as possible, are well lit and are covered by adequate CCTV.</p> <p>Climbing Aids – Whilst climbing aids on the whole are not within the design, every effort should be made to ensure that the design does not inadvertently create opportunities to climb up to roof, balcony or amenity spaces. Review of the distances and materials should be taken into account across the site and designed in such a way that it cannot become a climbing aid.</p>	

Stakeholder	Question/Comment	Response
	<p>Adjoining Balconies – Adjoining balconies leave the residents more vulnerable to crime and ASB. Where possible it is recommended that balconies are suitably separated to ensure that climbing between them is not possible. Where this cannot be designed out it is advised that the doors and windows are to an enhanced standard to mitigate the risk.</p> <p>Postal Strategy – In order to prevent against postal theft, it is recommended that post be delivered to each unit or the control room out of hours. A strategy for bulky package delivery and where this will be stored securely should also be reviewed against the number of units who potentially may use this feature daily.</p> <p>Site specific advice may change depending on further information or site limitations as the project develops:</p>	

Appendix 4: Representations from local residents

Matter Raised	Response
Density of Development	The proposal would deliver a notable increase in the density of employment floor space on the site. The level of intensification and the resultant density of the development is considered to respect the character of the surrounding area and scale of built form in the locality, whilst also making best use of the available land. As such, the proposed density of the development is considered acceptable.
Lack of Units for Micro Businesses	It is accepted that the scheme would not deliver a large number of units suitable for micro businesses. However, a significant number of units would be suitable for small, medium and large sized enterprises. Overall, it is considered that the wider benefits of the scheme would outweigh the lack of units for micro businesses.
Numbering on Units	Officers do not consider that the addition of numbering to the proposed buildings would be visually intrusive. The numbering would be useful for navigation around the site, and as such would benefit the useability of the development.
Garrish and Intrusive Colours	There is no objection to the colours proposed throughout the scheme. The bright colours intended to be incorporated would contribute to the distinctive character of the development, whilst also suitably relating to the adjacent Florentia Clothing Village.
Traffic on Overbury Road, Heritage Road and Vale Road	The Council's Transportation Team has not objected to the application on the basis of increased traffic. Furthermore, the submitted Transport Assessment considers that the capacity of the local highway network would not be compromised. Therefore, there is no indication that there would be a severe impact on the local highway network, in terms of traffic or congestion.
Lack of Parking	The level of parking has been deliberately limited, so to promote more sustainable travel to the site. This

	aspiration is supported by officers.
Biodiversity	The scheme would deliver a tangible net gain in biodiversity, and this is considered acceptable.
Lack of Waste Storage	Sufficient storage for waste would be provided within the site. This has been confirmed by the Council's Waste Team which has not objected to the development.
Storage for Existing Businesses	The Council cannot control how the owners of the site market, advertise or rent out the proposed units. This matter falls outside the remit of the planning process.
Lack of Consultation	Public consultation was carried out by the Local Planning Authority in accordance with the Council's Statement of Community Involvement. The Council always encourages developers to widely consult the community, prior to submission of an application. The developer has provided a Statement of Community Involvement, which demonstrates that notable community engagement has occurred.