

Planning Sub Committee – 16 January 2023

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2022/2293

Ward: Northumberland Park

Address: 45-47 Garman Road N17 0UN

Proposal: Redevelopment of the site to provide a self-storage facility (Use Class B8) with associated car and cycle parking, refuse storage, landscaping and other associated works ancillary to the development.

Applicant: Shurgard UK Ltd.

Ownership: Private

Case Officer Contact: Kwaku Bossman-Gyamera

Committee Site Visit Date: 13/01/2023

Date received: 15/08/2022

Last amended date: N/A

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

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- There is strong policy support for employment space within a site designated as a Strategic Industrial Location.
- The proposed scale and design of the development is appropriate within the context of the site and would be of good quality and have a positive impact on the visual appearance of the area.
- The development would provide a sufficient number of appropriately located car and cycle parking spaces, would encourage sustainable transport initiatives and include appropriate mitigation measures to minimise impacts upon the public highway; and
- Further sustainability measures are secured via conditions and a Carbon Offset contribution.

2. RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission and that the Head Development Management is authorised to issue the planning permission and impose conditions and informative 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 the agreement referred to in resolution (2.1) above is to be completed no later than 24th February 2023 or within such extended time as the Assistant Director Planning, Building Standards & Sustainability/Head of Development Management shall in her/his sole discretion allow; and
- 2.3 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.
- 2.4 That delegated authority be granted to the Head of Development Management or the Assistant Director 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.

Summary Lists of Conditions, Informative and Heads of Terms

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

- 1) Development begun no later than three years from date of decision
- 2) In accordance with approved plans
- 3) Materials submitted for approval
- 4) Land contamination
- 5) Unexpected contamination
- 6) NRMM
- 7) Waste and recycling
- 8) Restrictive in use classes
- 9) CMP
- 10) Cycle parking Design and Layout
- 11) Surface Water Drainage
- 12) Management and Maintenance
- 13) Secure by design
- 14) Energy Strategy
- 15) Be Seen
- 16) Overheating
- 17) BREEAM Certificate

- 18) Living Roofs
- 19) Urban Greening Factor
- 20) External lighting
- 21) Boundary Treatment
- 22) Noise
- 23) Servicing and delivery plan

Informatives

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

Section 106 Heads of Terms:

- 1) Energy Statement
 - a. An amended energy plan and Sustainability Review is to be provided on first occupation of the development.
 - b. Estimated carbon offset contribution (and associated obligation) of £11,685 plus a 10% management fee to be recalculated using Part L2013 software, based on £2,850 per tonne of carbon emissions.
- 2) Site – Wide Travel Plan
 - a. To include details of welcome packs that will be provided to all new residents (to include information on public transport and cycling/walking connections).
 - b. To appoint a travel plan co-ordinator to work in collaboration with the Estate Management Team, to monitor the travel plan initiatives for a minimum of five years.
 - c. Provision of a contribution of £1,000 per annum for five years towards monitoring of the travel plan.
- 3) Employment and Skills

- a. Submission of an employment and skills plan
 - b. No less than 20% of the peak construction workforce to be Haringey residents
 - c. Provision of financial contribution £150,096.00 at which will be used by the council to provide and procure the support necessary for local people who have been out employment and / or do not have the skills set required for the jobs created.
- 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 securing sufficient energy efficiency measures and/or financial contribution towards carbon offsetting, would result in an unacceptable level of carbon dioxide emissions. As such, the proposal would be contrary to Policies SI2 and SI 4 of the London Plan 2021, Local Plan 2017 Policy SP4 and Policy DM21 of the Development Management Development Plan Document 2017.*
 2. *The proposed development, in the absence of a legal agreement securing sustainable transport measures, would have an unacceptable impact on the safe operation of the highway network, give rise to unsustainable modes of travel. As such, the proposal would be contrary to London Plan Policies T1, T2, T6, T6.1 and T7, Local Plan Policy SP7 and Policy DM31 of the Development Management DPD.*
 3. *The proposed development, in the absence of a legal agreement to work with the Council's Employment and Skills team to provide 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 is contrary to Policy SP9 of Haringey's Local Plan 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 or the Assistant Director of Planning, Building Standards and Sustainability (in consultation with the Chair of Planning Sub-Committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:

- (i) There has not been any material change in circumstances in the relevant planning considerations, and;
- (ii) The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and;
- (iii) The relevant parties shall have previously entered into the agreement contemplated in resolution (2.6) above to secure the obligations specified therein.

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3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1 Proposed development

3.1.1. This is an application for the demolition of the existing building on site and redevelopment to provide a self-storage facility (Use Class B8), comprising of 11,426 sqm of floor-space across three levels, with associated landscaping, external car parking and cycle parking. The proposal is to be operated by Shurgard UK Ltd, who have a number of similar operations throughout the country.

3.1.2. The proposed warehouse building would be four storeys, at a total height of 23.70 metres, and the footprint is set within the extent of the existing building area to be demolished.

3.1.3. The existing access off Garman Road will be retained.

3.2 Site and Surroundings

3.2.1 The existing site comprises a single-storey 1592 sqm warehouse in industrial/retail use with ancillary office/welfare floorspace located to the eastern side of Garman Road, on the southern side of the junction of Garman Road with Sedge Road.

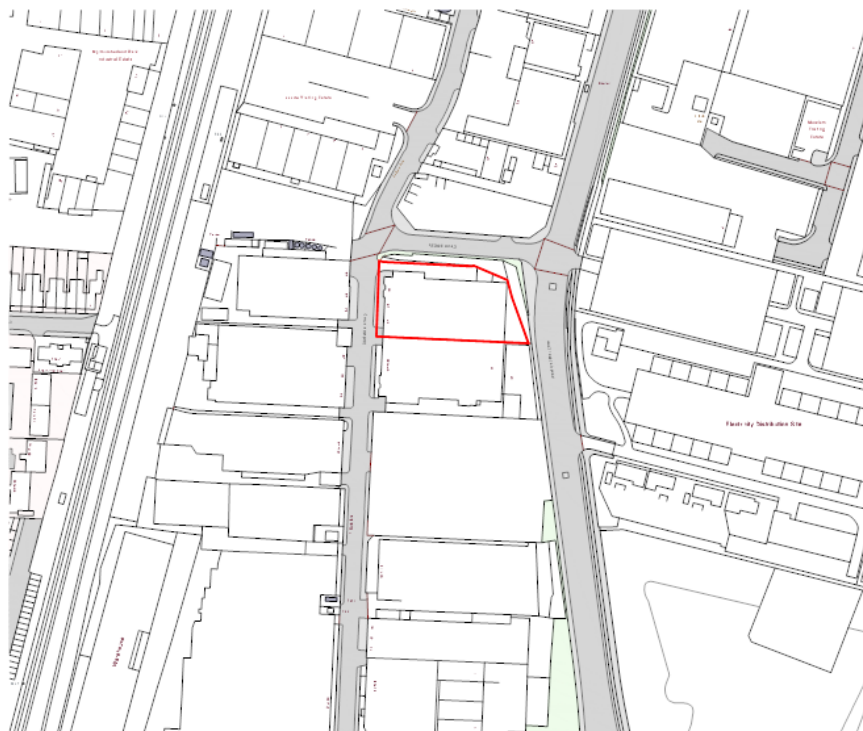


Image 1 Site location Plan



Image 2 Aerial view of the site

3.2.2 The existing building forms half of a larger building, broadly symmetrical in design. The application site is currently vacant, and the site's last use was by Tower Systems Furniture Ltd. There are 3 recent planning permission for large replacement buildings on neighbouring sites to the south details are set out in planning history below.

3.2.3 The site is designated as a Strategic Industrial Location and within Flood Zone 2. The surrounding area is characterised by industrial and commercial uses. The site also lies within the Tottenham Area Action Plan and is within an Archaeological Priority Area.

3.3 Relevant Planning History

3.3.1 HGY/2022/2771 - Prior Approval: Demolition of approximately 0.25 ha of building comprises a single storey building. (This application is under consideration).

3.3.2 Permission has recently been approved on neighbouring sites:

- 3.3.3 HGY/2021/2248 Proposal: Erection of two replacement B1/B2/B8 units following fire damage and demolition of the original units (Amended drawings)
Site Address: 27-31 Garman Road London N17 0UP
Decision: Approve with Conditions (14/09/2022)
- 3.3.4 HGY/2020/3186 Proposal: Erection of two-storey replacement light industrial unit.
Site Address: Unicorn Works 21-25 Garman Road London N17 0UN

Decision: Approve with Conditions (30/08/2022).
- 3.3.5 HGY/2022/0081 Demolition of the existing industrial buildings and redevelopment to provide a new building for manufacturing, warehouse or distribution with ancillary offices on ground, first and second floor frontage together with 10 No. Self-contained design studio offices on the third floor.
Site Address: 15-19 Garman Road London N17 0UR
Committee resolved to grant permission subject to S106 4/7/2022.

3.4 Relevant Enforcement History

3.4.1 None

4. CONSULTATION RESPONSE

4.1 Application Consultation

4.1.1 The following were consulted regarding the application:

Internal:

- 1) LBH Transport: No objection subject to obligations and condition to secure cycle parking details and Construction Logistics Plan.
- 2) LBH Carbon Management: No objection subject to condition and obligations.
- 3) LBH Waste Management: No objection subject to condition.
- 4) LBH Building Control: No objection, but requested for additional information. This additional information has been provided by applicant.
- 5) LBH Flood & Water Management: No objection subject to conditions in relation to drainage strategy and management/maintenance.
- 6) LBH Pollution Air Quality: No objection, subject to contamination conditions.

7) LBH Economic Regeneration: No comments.

8) LBH Arboriculturist Officer: No comments.

External:

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

10) London Fire Brigade: No comments.

5. LOCAL REPRESENTATIONS

5.1 The following were consulted:

34 Neighbouring properties

1 site notices were erected close to the site

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

No of individual responses: 1

5.1.2 Cllr Bevan: submitted the following comments:

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

6 MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of the development
2. Tall Building
3. Design and appearance
4. Parking and highway safety
5. Energy and Climate Change

6. Urban Greening Factor
7. Ecology and Biodiversity
8. Flood risk and drainage
9. Air quality
10. Land contamination
11. Impact on the amenity of adjoining occupiers
12. Waste and recycling
13. Employment
14. Fire Safety
15. Conclusion

6.2 Principle of the development

- 6.2.1 The site is designated as a Strategic Industrial Location (SIL) (DEA2) which safeguards the land for a range of industrial uses – Classes ranging from B1 (Business) (now class E (Commercial Business and Service) (g)), B2 (General Industrial) and B8 (Distribution or Storage).
- 6.2.2 The NPPF encourages Local Authorities to help create the conditions in which businesses can invest, expand and adapt, stating that significant weight should be placed upon the need to support economic growth and productivity, taking into account business needs and wider opportunities for development.
- 6.2.3 The London Plan (2021) Policies E4 and E5 state that the retention, enhancement and provision of additional industrial capacity should be prioritised in locations that:
1. are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport;
 2. provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population;
 3. provide capacity for micro, small and medium-sized enterprises;
 4. are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments subject to existing provision; and
 5. support access to supply chains and local employment in industrial and related activities.
- 6.2.4 Strategic Policy SP8 of the Local Plan indicates that there is a presumption to support industry and business in the borough through safeguarding designated land for a range industrial uses The Council will secure a strong economy in Haringey and protect the Borough's hierarchy of employment land, Strategic

Industrial Locations, Locally Significant Industrial Sites, Local Employment Areas and other non-designated employment sites. The forecast demand is for an additional 23,800sqm of B Class floor space up to 2026. This forecast demand is to be met through:

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

6.2.5 In addition, the Council will also:

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

6.2.1 The application site is within the Northeast Industrial Estate which is part of a Strategic Industrial Location (SIL), located within the North Tottenham area identified within the Tottenham AAP. The proposed net increase in internal floorspace would be approx. 6254 sq.m Therefore, the site would provide enhanced employment use and economic benefits particularly in terms of securing a modern, viable use of the site. The proposal would contribute to the delivery of good quality employment floorspace in Haringey. This is supported by policy E6 of the London Plan and policy AAP4 of the Tottenham AAP.

6.2.2 The proposed development meets the Local Plan objective of making efficient use of land and contributes towards policy objectives for accommodating industrial land and supporting economic growth and to be acceptable in principle.

6.3 Tall Building

6.3.1 London Plan Policy D9 states that local development plans should define what is considered a tall building, and that buildings should not be considered 'tall' where they are less than six storeys (or 18 metres) in height. Policy D9 also states that boroughs should determine the locations where tall buildings may be an

appropriate form of development and that tall buildings should be located in areas identified as suitable in local development plans.

- 6.3.2 The DM DPD defines 'tall' buildings as being those which are ten storeys or greater in height and 'taller' buildings as those which generally project above the prevailing height of the surrounding area and are lower than ten storeys.
- 6.3.3 Policy DM5 of the DM DPD states that obstructions to locally significant views should be minimised. Policy DM6 of the DM DPD states that that all proposals for taller and tall buildings must be accompanied by an appropriate urban design analysis that explains how the buildings would fit into the local context. The Tottenham Area Action Plan Policy AAP 6 notes that Taller buildings will be appropriate in some cases promoting intensification, increasing heights from low-rise to mid-rise where appropriate.
- 6.3.4 The height of the existing single storey building is 6.7 metres, the proposal is for 3 storeys of storage space which would be equivalent to approximately 7 storeys of non-industrial floorspace due to the floor to ceiling heights proposed and would be 23.7 metres in height.
- 6.3.5 Policy DM6 of the DM DPD states that tall buildings will only be acceptable within identified areas. This site is not identified within Figure 2.2 of the DM DPD as being suitable for tall buildings, but the proposal does not meet the definition of a tall building within the DM DPD. The proposed building projects above the prevailing height of the surrounding area of 1-3 storeys (industrial) but would sit in the context of other taller buildings in the surrounding area which includes buildings of 14 metres approved on Garman Road and the existing substation of 22 metres so would not be unduly prominent within the surrounding townscape.
- 6.3.6 As the proposal exceeds 18 metres it must satisfy the detailed criteria of the Policy D9 in terms of visual, functional, environmental and cumulative impacts.
- 6.3.7 The applicant has submitted a Tall Building Analysis including an assessment of key views using 3D mapping software. This demonstrates that in the context of the existing Sub-Station on Watermead Way (22 metres), approved planning permissions on Garman Road (14 metres) and further North in LB Enfield (where heights exceed 100 metres) the proposal is appropriate in local views particularly given the likelihood of further redevelopment within the surrounding area and is therefore considered to accord with Policy DM6 and Policy AAP6.



Image 3 View from Garman Road looking North (the proposal is pink with approved buildings in blue and yellow)

- 6.3.8 The Tall Building Analysis notes that the building would aid wayfinding by marking the junction of Sedge Road and Watermead Way and the Architectural quality and materials are of good quality for a building of this nature as set out in more detailed below. The Tall Building Analysis notes the proposal would not impact on any heritage assets or significant local views in accordance with DM5. It would not create glare or light pollution.
- 6.3.9 The design officer has reviewed the Tall Buildings Analysis and notes that the proposal will be compatible in height, bulk and massing with the existing and emerging context. In particular it will be of comparable height and mass, albeit less bulk due to its shorter width, to the electricity installation. Views 1 and 2 (set out in appendix 2 below) show its similarity, with the latter, from the edge of the marshes, showing it will not be more impactful than the existing electricity installation in any views from the park, whilst the view looking north-west up Watermead Way (View 4) demonstrates this and also shows how they will frame a view of the more distant point block in Meridian Water.
- 6.3.10 The design officer notes that View 6, looking up Garman Road from the south shows how it represents a gradual build up in height, of one additional storey on each of the plots along the east side of Garman Road, along with its immediate

neighbouring recently permitted developments, from the existing 2 storey industrial buildings at the southern end of the street. This view also shows the greater heights permitted in Meridian Water, whilst the more distant Views 7a and 8 show how the greater height of the wider masterplanned developments both there and to the south will leave the Garman Road area still at significantly lower height.

6.3.11 In terms of fire safety access and servicing the proposal is found to be acceptable as set out below and all other functional impacts are acceptable. There would be no significant environmental impacts given the height of the building in relation to its context.

6.3.12 It is considered that the proposal satisfies policy objectives requiring tall and taller buildings to be appropriately located, and acceptable in terms of their surroundings.

6.4 Design and appearance

6.4.1 DM Policy (2017) DM1 'Delivering High Quality Design' states that development proposals should relate positively to their locality, having regard to, building heights, form, scale & massing prevailing around the site, urban grain, sense of enclosure and, where appropriate, following existing building lines, rhythm of any neighbouring or local regular plot and building widths, active, lively frontages to the public realm, and distinctive local architectural styles, detailing and materials. Local Plan (2017) Policy SP11 states that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. Development shall be of the highest standard of design that respects its local context and character and historic significance, to contribute to the creation and enhancement of Haringey's sense of place and identity which is supported by London Plan Policy D4.

6.4.2 The proposal would replace the existing industrial unit with largely the same footprint but introduce a separation from the neighbour building to the south. The existing built form of the locality is fairly dense and there are tight relationships between buildings so this layout is considered acceptable.

6.4.3 In terms of design the scheme includes grey, sinusoidal profiled cladding to the majority of the building exterior, with vertically aligned corrugations and a narrow, red, horizontal band at first floor level on all elevations with a similar red band around the margins of an inset section on the southern elevation. The inset itself utilises white coloured cladding, which is considered appropriate in this location.

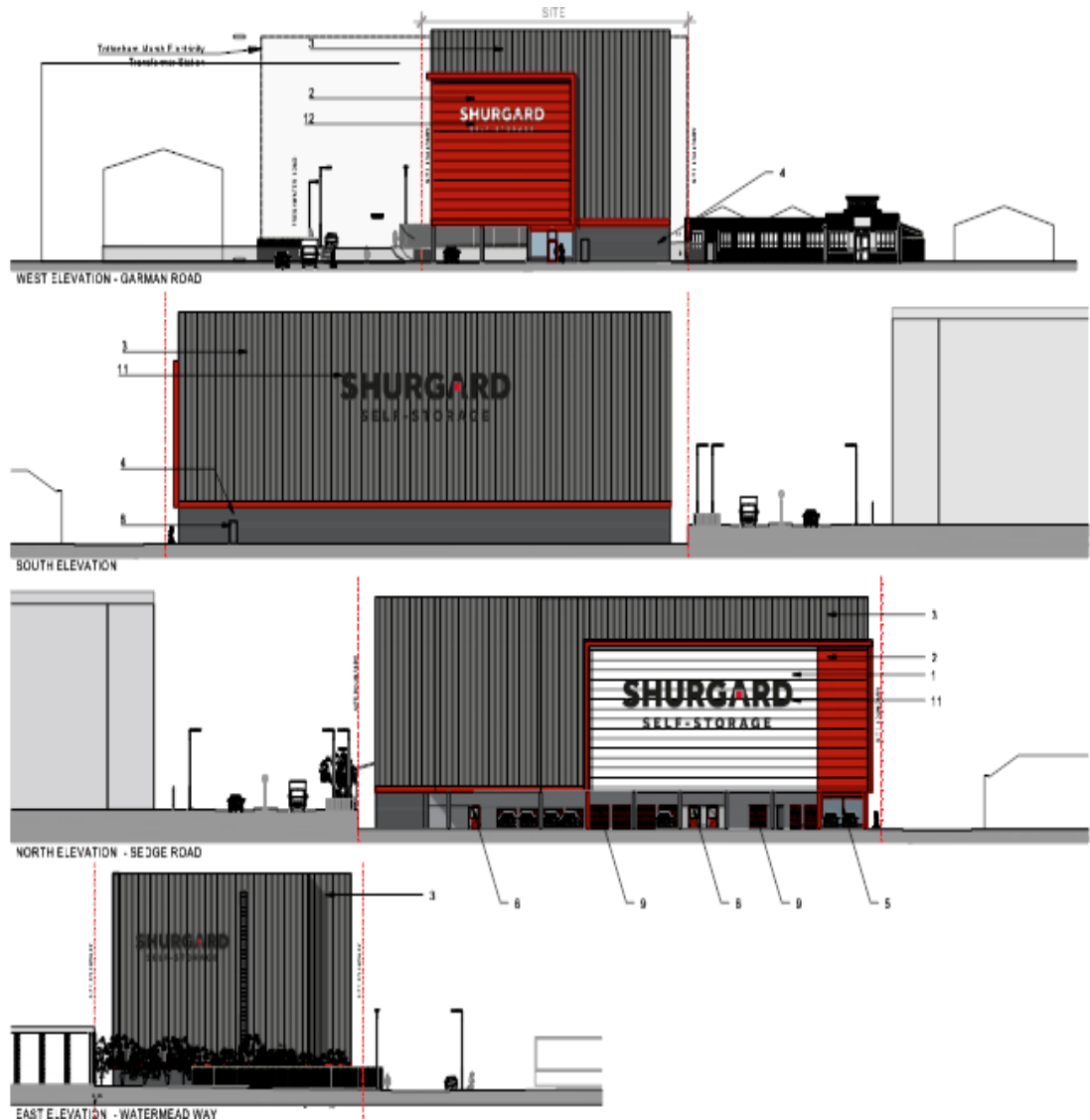


Image 4- proposed elevations

6.4.4 The Council's design officer has reviewed the scheme and notes that the site is in the centre of an established industrial area surrounded by other active industrial buildings. Most of these immediate neighbours are in the 1-3 storey height range, but recent permissions for neighbouring sites immediately south of this application site have granted permission for new industrial buildings of four storeys (HGY/2022/0081). It should also be noted that all these industrial buildings' floor heights are greater than would be typical in residential buildings.

6.4.5 The design officer notes that immediately east of the application site, across, is a very large, tall and imposing electricity switching station, with a main building of equivalent to at least 6 industrial floors, and with a dense cluster of much taller electricity pylons.

- 6.4.6 With regard to the proposed design and appearance the design officer notes that design advice to simplify the form of the proposal, to give it a more elegant, less complex and visually jarring appearance, and to significantly tone down the colour scheme proposed for the external cladding, has been fully followed. The design officer notes that a fairly lively external appearance, as proposed, is not incompatible with the vibrant mix of existing industrial buildings, signs and advertising boards in the immediate context.
- 6.4.7 The design officer notes that the proposed design is utilitarian but enlivened by landscaped edges and provided with clear, legible approach and entrances that will accommodate pedestrian and cycle access as well and to greater prominence than vehicle access. Small landscaped external amenity spaces are included for staff and visitors, and the proposals avoid the use of ugly, alienating external boundary fences, any ugly and unsustainable large expanses of surface parking / delivery bays (they being accommodated under the building) or any “forgotten” left-over spaces.
- 6.4.8 The design officer concludes that the proposals are acceptable in design terms for a location with low sensitivity and already with significant height, bulk and mass, trending in the direction of being further redeveloped at similar heights, and with much greater height not far away.
- 6.4.9 A condition will require approval of all external materials and restrict the addition of rainwater goods to the building elevations.
- 6.4.10 The proposal includes good quality landscaping around the eastern and northern boundaries of the site, the detail of which can be secured by condition. Comments in relation to the boundary treatment are noted and a condition is included to ensure the final boundary treatment is approved prior to occupation of the development.
- 6.4.11 Officers consider that the proposals are considered acceptable in design terms for a location with low sensitivity and already with significant height, bulk and mass, trending in the direction of being further redeveloped at similar heights, and with much greater height not far away. This development, would be a striking, functional, compatible with its location and of no harm to any more sensitive areas and respond successfully to the setting.

6.5 Parking and highway safety

- 6.5.1 Local Plan (2017) Policy SP7 Transport states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This is supported by DM Policy (2017) DM31 ‘Sustainable Transport’. The Tottenham Area Action Plan Policy

AAP7 further identifies the need for sustainable transport measures to be considered.

6.5.2 The site has a PTAL value of 3, considered 'moderate' access to public transport services. 4 different bus services are accessible within 2 to 5 minutes' walk of the site, and Northumberland Park Railway Station is a 5-minute walk away. It is also located within the Tottenham Hotspur event day CPZ.

6.5.3 In terms of parking, while the adjoining building includes 5 dedicated off-street parking spaces, the application site does not have any specified off-street parking, however limited parking has taken place in an ad hoc capacity, within the front forecourt of the building. The existing access off Garman Road will be retained, it is not proposed to make any physical changes to it.



Image 5 - Proposed Access and Parking Plan

6.5.4 The proposed development will be fully enclosed and gated within the site, off Garman Road, which would avoid vehicles waiting in the street for access. This will provide a secure area within which there will be 6 car parking spaces, plus a bay for vans up to 7.5 tonne which is the largest van operationally likely to visit the site. This will be for customers making deposits or retrievals from the storage facility. Long stay cycle parking including cargo bike parking will also be in this area.

6.5.5 There will also be 3 bays for visitors in between the access gate and site entrance along with visitor cycle parking. Two of the car parking bays will be

Electric Vehicle Charging Points (EVCP) bays, with active charging facilities plus two of the spaces will be blue badge bays with larger dimensions.

- 6.5.6 The Transportation Team have reviewed the proposal and advise that the proposed levels of car parking both suit the likely operational requirements of the development and are within the range of provision prescribed by the London Plan (up to 1 space per 100 sqm for outer London).
- 6.5.7 They note that the Transport Assessment details that in the AM peak there will be 7 two way vehicle trips and 6 within the PM peak. There are no on street parking demand impacts expected from this proposal.
- 6.5.8 10 short-stay, plus 10 long-stay cycle (including 4 cargo bike) parking spaces will be provided. This meets the requirements of the London Plan. The arrangements need to be sufficiently secure and weatherproof and should be designed in accordance with the London Cycle Design Standards as produced by TfL. Dimensioned and detailed drawings demonstrating this and the manufacturer's installation specifications will be required and this can be covered by condition.
- 6.5.9 Numbers of delivery and servicing trips will be very low and there is the ability to accommodate car/vans and trucks up to 7.5 tonne within the site. Refuse storage will be on the ground floor and the Transport Assessment notes the expected pick up will be from Garman Road.
- 6.5.10 A draft travel plan has been included in the application. The Council's Transportation officer is satisfied with the measures provided. A Travel Plan monitoring fee will be required through the s106 agreement. To help mitigate the impact of development on the highway, and to ensure that the adjacent roads are not impacted, a condition requiring a Construction Logistics Plan is included.
- 6.5.11 Subject to the Conditions included at Appendix 1, Officers consider that the proposed scheme would not have any undue impacts on the road network, and through the inclusion of cycle parking, would encourage the uptake of sustainable modes of transport.

6.6 Energy and Climate Change

- 6.6.1 The NPPF requires development to contribute to the transition to a low carbon future and to reduce energy consumption.
- 6.6.2 London Plan Policy SI2 states that major developments should be zero carbon, and in meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Local Plan Policy SP4 requires all new developments to be zero carbon and to introduce measures that reduce energy use and carbon emissions. Local Plan Policy SP11 requires all

development to adopt sustainable design and construction techniques to minimise impacts on climate change and natural resources.

Energy – Clean

- 6.6.3 London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs.
- 6.6.4 The applicant is not proposing any Be Clean measures. The site is not within reasonable distance of a proposed Decentralised Energy Network (DEN). A Combined Heat and Power (CHP) plant would not be appropriate for this site.

Energy - Green

- 6.6.5 As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4
- 6.6.6 The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 3.5 tCO₂ (38%) reduction of emissions are proposed under Be Green measures

Overheating

- 6.6.7 The London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.
- 6.6.8 In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM52 with TM49 weather files, and the cooling hierarchy has been followed in the design.

Whole Life Carbon and Circular Economy

- 6.6.9 Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life Carbon Assessment (WLCA) and demonstrate actions undertaken to reduce life-cycle emissions.
- 6.6.10 This application is not required to submit a full statement. A WLCA was submitted, but it does not summarise the results in kgCO₂/m² and report against GLA benchmarks and aspirational targets or the LETI targets but nevertheless is in line with the above policy and the Carbon Management Officer raises no objections on this basis.
- 6.6.11 Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement (CES) demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.
- 6.6.12 A CES was submitted as part of the application, which is supported.
- 6.6.13 The proposal satisfies the required development plan policies and the Council's Climate Change Officer supports this application subject to conditions and planning obligations. As such, the application is considered acceptable in terms of its carbon reduction and sustainability.

6.7 Urban Greening Factor

- 6.7.1 Policy G5 of The London Plan 2021 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design. The policy states that non-residential development should meet an urban greening factor target of 0.3 but states that whilst B2 and B8 uses are excluded from the 0.3 target, such development is still expected to set out what measures they have taken to achieve urban greening on-site.
- 6.7.2 A significant increase in soft landscaping is proposed as part of the development along the boundaries with Sedge Road and Watermead Way to the north and east of the site. The proposed soft landscaping comprises:

- 3-3.5m tall tree planting in native species such as birch, hornbeam, rowan, cherry and hawthorn trees;
- Mixed native species hedging, maintained at a 1.5m height, such as guelder rose, hawthorn, slow, hazel, holly, dog rose and honeysuckle;
- Low growing native species shrubs at under 1m in height;
- Medium/tall growing native species shrubs and over 2m in height; and
- Medium growing specimen native species shrubs at between 2 and 3m in height.

6.7.3 The development would include a biodiverse roof at roof level incorporating native planting, such as wildflowers and herbs. A condition of approval will be secure to ensure that proposal is policy compliant.

6.7.4 **Ecology/ Biodiversity**

6.7.5 Policy G6 of the London Plan requires development proposals to manage impacts on biodiversity and aim to secure net biodiversity gain.

6.7.6 Strategic Policies DPD Policy SP13 requires development to protect and improve biodiversity, including contributing to wildlife and ecological habitats and, where possible, including tree planting, green and brown roofs, rainwater harvesting, green walls, bird and bat boxes.

6.7.7 The proposed soft landscape area surrounding the new self-storage facility have been design to maximise the Bio-diversity of the area by using a mixture of nature species hedging plants.

6.7.8 The proposal will create a significant increase in ecological value in relation to broad habitats and 100% increase in ecological value in relation to hedgerow habitats, significantly exceeding the 10% Biodiversity Net Gain requirement in accordance with the above policies.

6.8 **Flood Risk and Drainage**

6.8.1 London Plan Policy SI12 states that flood risk should be minimised and Policy SI13 states that development proposals should aim to achieve greenfield run-off rates with water managed as close to source as possible. Local Plan Policy SP5 and Policy DM24 of the DM DPD seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage.

6.8.2 The site is located with Flood Risk Zone 2 (low) as defined by the Environment Agency. The site is modelled as being at low risk (1 in 1000 years) from surface water flooding. The applicant has submitted a Flood Risk Assessment and drainage strategy.

- 6.8.3 The DPD Policy DM24 seeks that *“All proposals for new development within Flood Zone 2 and 3a will be required to provide sufficient evidence for the Council to assess whether the requirements of the Sequential Test and Exception Test, where required, have been satisfied.”*
- 6.8.4 The proposals are considered least vulnerable in relation to flood risk. Therefore, it is considered that the Sequential and Exception Test are not necessary for the proposed use. The development will not place additional persons at risk of flooding and will offer safe means of access and egress. In addition, the development will not increase flood risk elsewhere as the same, if not less, impermeable surfaces are proposed.
- 6.8.5 In terms of sustainable drainage, surface water run-off will be attenuated using an underground cellular attenuation tank before connecting to existing surface water sewers and filter strips adjacent to soft landscaping. In the event that flows from rainfall exceed the 1 in 100 year rainfall event, surface water run-off will be directed via exceedance routes away from buildings and critical infrastructure. A condition to secure a drainage system and its details is recommended.
- 6.8.6 While the site is within a critical drainage area, the area of hardstanding does not increase. DPD Policy DM26 states that *‘All proposals for new development within a Critical Drainage Area (CDA) will be required to incorporate measures to reduce the overall level of flood risk in the CDA.’* A condition will be required to put measures in place to reduce flood risk.
- 6.8.7 Accordingly, the proposed development is considered to comply with local drainage policies.

6.9 Air Quality

- 6.9.1 Policy SI1 of the London Plan states that development proposals should be air quality neutral. Policy DM23 states that developments should not have a detrimental impact on air quality, noise or light pollution.
- 6.9.2 The applicant has submitted an Air Quality Assessment. The report sets out a range of mitigation measures to prevent air quality impacts during construction and demolition, including avoiding scabbling (roughening of concrete surfaces), and storage of sand and other aggregates in bunded areas, ensuring the material are not allowed to dry out. These measures will ensure that the development will be air quality neutral.
- 6.9.3 Officers consider that the mitigation measures proposed during demolition and construction are sufficient to make the scheme acceptable from an air quality perspective.

Land Contamination

6.9.4 Local Plan Policy DM23 requires development proposals on potentially contaminated land to follow a risk management-based protocol to ensure contamination is properly addressed and to carry out investigations to remove or mitigate any risks to local receptors.

6.9.5 The Council's Pollution Officer has been consulted as part of the application and has raised no objections, subject to further investigations being made at the construction stage and this is to be secured by way of the imposition of conditions on any grant of planning consent.

6.10 Impact on the amenity of adjoining occupiers

6.10.1 London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, and states that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing. DM Policy (2017) DM1 'Delivering High Quality Design' states that development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours. The Council will support proposals that provide appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development and address issues of vibration, noise, fumes, odour, light pollution and microclimatic conditions likely to arise from the use and activities of the development.

6.10.2 The proposed use due to the nature of the use as storage, without the use of heavy industrial equipment or large heavy good vehicles, would not generate significant or unacceptable levels of noise disturbance. Any noise generated from comings and goings and servicing is likely to be masked by existing background noise from the road and railway track. The closest neighbouring residential properties are over 200m away from the boundary of the site, which also helps to ensure that neighbouring amenity will not be impacted.

6.11 Waste and Recycling

6.11.1 London Plan Policy London Plan Policy SI5 indicates the Mayor is committed to reducing waste and facilitating a step change in the way in which waste is managed. Local Plan Policy SP6 Waste and Recycling and DPD Policy DM4, requires development proposals make adequate provision for waste and recycling storage and collection.

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

6.11.3 **Employment**

6.11.4 Local Plan Policy SP8 requires all major development to help ensure that Haringey residents have access to work and share in the increasing wealth associated with expanding the local and London - wide economy. To this end, proposals are expected to demonstrate a commitment to improve education, skills and training provision. Policy AAP4 of the TAAP states that The Council will support local residents to access local and London-wide jobs and, where appropriate, may seek planning contributions towards employment initiatives in line with policies SP9 and DM48.

6.11.5 Provisions for local employment skills and training will be secured by S106 obligations.

6.11.6 The applicant has indicated that a self-storage facility generates direct jobs (3-4 FTE) and indirect jobs for local businesses, especially SMEs. The occupier's analysis of existing operations shows that approximately 15-20% of their customers are registered businesses and an additional 10% are sole-trader businesses, with a majority being small, start-up or local businesses and small medium enterprises.

6.12 **Fire Safety**

6.12.1 Policy D12 of the London Plan states that all development proposals must achieve the highest standards of fire safety. To this effect major development proposals must be supported by a fire statement.

6.12.2 The applicant has provided a Fire Statement in accordance with Policy D12. Haringey Building Control has been consulted on this application and requested further information which the application has provided. A revised response from Building Control will be reported as an addendum,

6.13 **Conclusion**

- There is strong policy support for employment space within a Strategic Industrial Location.

- The proposed scale and design of the development is appropriate within the context of the site and would be of good quality and have a positive impact on the visual appearance of the area.
- The development would provide a sufficient number of appropriately located car and cycle parking spaces, would encourage sustainable transport initiatives and include appropriate mitigation measures to minimise impacts upon the public highway.
- Officers are also satisfied that the proposal complies with policy objectives regarding tall buildings, employment, impact upon amenity, transport and travel, energy and sustainability, biodiversity floor risk and air quality. Officers have recommended conditions, and s106 heads of terms, where necessary to make the scheme acceptable in planning terms.

7.0 COMMUNITY INFRASTRUCTURE LEVY (CIL)

Based on the information given on the plans, the Mayoral CIL charge will be £300,932.10 (4,662sqm x £64.55) and the Haringey CIL charge will be £0 as the use is subject to a Nil Rate

8.0 RECOMMENDATION

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

Appendix 1 – Condition and Informatives

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

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

2. The development hereby authorised shall be carried out in accordance with the following approved plans and specifications: Sustainability Statement Ref: 22 E066-002; Whole Lifecycle Carbon Assessment Ref: 22-E066-004; Energy Statement Ref:22-E066-003; Circular Economy Statement Ref:22-E066-005; V.U. City Analysis Report June 2022 (28.11.22 Rev. A); 22007GA-VuCity Analysis Document (1) 8-14; Thermal Comfort Analysis Ref:22-E066-006; 22007GA-10-001; 22007GA 10-003A; 22007GA-10-004; 22007GA-D-001; 22007GA_D_002B; 22007GA_D_003A; 22007GA-D-004; 22007GA-D-005A; 22007GA-D-006A; 22007GA-D-007A; 22007GA-D-010; 22007GA-D-011; 22007GA-D-012; 22007GA-D-013; ST102.21.SL-01 Rev. B; Design and Access Statement -July 2022 Rev. C; Air Quality Assessment - Report Ref:2203250-01A, August 2022; Transport Statement - Report Ref:2203250-02A, August 2022; Travel Plan Report Ref:2203250-03A, July 2022; 2203250-05 Noise Assessment Letter dated 26 July 2022; Construction & Environmental Management Plan for Shurgard UK Ltd - June 2022; Site Waste Management Plan for Shurgard Uk Ltd - June 2022; Planning Statement - Project Number R00619 - August 2022; Drainage Strategy Doc Ref: 24318-HYD-XX-XX-RP-C-7000 - 1 August 2022 prepared by Hydrock Consultants; Desk Study completed by Brownfield Solution Ltd (Ref: SRP/M4993/10841); Biodiversity Impact Assessment Report prepared by Martin Roche - Ref:552088MRJuly22_FV03_BIA docx; Preliminary Ecological Appraisal Report prepared by Martin Roche -Ref:552088MRJuly22_FV03_PEA docx and PEA-part 2; London Plan Fire Safety Report Ref: 65206817 Rev.1 - Prepared for Shurgard UK Ltd; Daylight and Sunlight Letter dated 6 June 2022; Part 2 Report, Part 3 Report, Part 4; Carbon Emission Reporting Spreadsheet; Phase II Geo-Environmental Assessment Report Ref: SRP/M4993/10981 - April 2022;

Reason: In order to avoid doubt and in the interests of good planning.

Materials

3. Samples of materials to be used for the external surfaces, rainwater goods hardstanding, gates and fencing, of the development shall be submitted to, and approved in writing by, the Local Planning Authority before any above ground development is commenced. Samples should include sample panels or brick types, cladding, window frames and a roofing material sample combined with a schedule of the exact product references. The development shall be provided as approved and retained as such thereafter.

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

Land Contamination

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

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

Unexpected contamination

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

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

NRMM

6. a. Prior to the commencement of the development, evidence of site registration at <http://nrmm.london> to allow continuing details of Non-Road Mobile Machinery (NRMM) and plants of net power between 37Kw and 560 Kw to be uploaded during the demolition/construction phase of the development shall be submitted to and approved by the Local Planning Authority.

Reason: To protect local air quality and comply with Policy SI 1 of the London Plan and the GLA NRMM LEZ.

Waste and recycling

7. Prior to occupation of the development, a detailed scheme for the provision of refuse and waste storage and recycling facilities has been submitted to and approved in writing by the Local Planning Authority. Waste management plan should include details of how refuse is to be collected from the site. Such a scheme as approved shall be implemented and permanently retained thereafter.

Reason: In order to protect the amenities of the locality and to comply with Policy DM4 of The Development Management DPD 2017 and Policy SI 2 of the London Plan 2021.

Restriction of use

8. Notwithstanding the provisions of the Town & Country Planning (Use Classes) Order 1987 (as amended), or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the premises shall be restricted to use classes Office/Light Industrial E (g)); industrial (Use Class B2);

and/or storage and distribution (Use Class B8) purposes only and shall not be used for any other purpose including any purpose within Class B

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

Construction Management Plan (including Construction Logistics Plan)

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

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

Cycle Parking

10. No development shall take place until details of the type and location of secure and covered cycle parking facilities have been submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied until the all cycle parking spaces for users of the development (10 no. short-stay, 10 no. long-stay cycle, including 4 cargo bike parking spaces) 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.

Drainage

11. No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate that:

- a) The surface water generated by this development for all the rainfall durations starting from 15 min to 10080 min (7 days not 1 day) and intensities up to and including the climate change adjusted critical 100 yrs. storm can be accommodated and disposed of without discharging onto the highway and without increasing flood risk on or off-site.
- b) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method.
- c) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development.
- d) The development shall not be occupied until the Sustainable Drainage Scheme for the site has been completed in accordance with the approved details and thereafter retained.

Reason: To ensure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter in accordance with policies DM26 and DM27 of the DPD (2017).

Management and Maintenance

12. Prior to occupation of the development hereby approved, a detailed management maintenance plan for the lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained.

Reason: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system.

Secure by design accreditation

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

Reason To ensure safe and secure development and reduce crime.

Energy Strategy

- 14.(a) Prior to above ground construction, a revised Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:
- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy, in line with Part L 2013;
 - Confirmation of the necessary fabric efficiencies to achieve a minimum 15% reduction in emissions, including details to reduce thermal bridging;
 - Location, specification and efficiency of the proposed ASHPs, their heating and cooling loads where relevant (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;
 - Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;
 - Details of the PV, demonstrating that a minimum of 200 sqm of the roof has been utilised and located to avoid any overshadowing, delivering a minimum 30 kWp array roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp);
 - A metering strategy.

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

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

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

Be Seen (Detail scheme for energy monitoring)

15. (a) Prior to the completion of the superstructure a detailed scheme for energy monitoring has been submitted to and approved in writing by the Local Planning Authority. This shall include details of suitable automatic meter reading devices for the monitoring of energy use and renewable/low carbon energy generation. The monitoring mechanisms approved in the monitoring strategy shall be made available for use prior to the first occupation of each building.

(b) Prior to each Building being occupied, the Owner shall provide updated accurate and verified 'as-built' design estimates of the 'Be Seen' energy performance indicators for each Reportable Unit of the development, as per the methodology outlined in the 'As-built stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance.

(c) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the approved Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant involvement to evidence this training and engagement.

(d) Upon completion of the first year of Occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each Reportable Unit of the development as per the methodology outlined in the 'In-use stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance document (or any document that may replace it).

All data and supporting evidence should be submitted to the GLA using the 'Be Seen' reporting webform (<https://www.london.gov.uk/what-wedo/planning/implementing-london-plan/london-plan-guidance-and-spgs/be-seen-energy-monitoring-guidance>).) If the 'In-use stage' evidence shows that the 'As-built stage' performance estimates have not been or are not being met, the Owner should investigate and identify the causes of underperformance and the potential mitigation measures and set these out in the relevant comment box of the 'Be Seen' in-use stage reporting webform. An action plan comprising measures shall be submitted to and approved in writing by the GLA, identifying measures which would be reasonably practicable to implement and a proposed timescale for implementation. The action plan and measures approved by the GLA should be implemented by the Owner as soon as reasonably practicable.

Reason: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2021 Policy SI 2 and Local Plan Policy SP4 before construction works prohibit compliance.

Overheating (Office space)

16. Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This report shall include:

This report will include:

- Revised modelling of units modelled based on CIBSE TM52, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s, high emissions, 50% percentile;
- Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy, demonstrating that any noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures;
- Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;
- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.

The development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development.

Reason: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy S14 and Local Plan (2017) Policies SP4 and DM21.

BREEAM Certificate

17. (a) Prior to commencement on site, a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Excellent” outcome (or equivalent). This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site. The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.

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

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

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

Living Roofs

18. a) Prior to the commencement of development, details of the living roof must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:
- i) A roof plan identifying where the living roofs will be located;
 - ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm);
 - iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate
 - iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays;
 - v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with roof ball of plugs 25m³) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);
 - vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and
 - vii) Management and maintenance plan, including frequency of watering arrangements.

(b) Prior to the occupation of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roof has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

Urban Green Factor

19. Prior to completion of the construction work, an Urban Greening Factor calculation should be submitted to and approved by the Local Planning Authority demonstrating a target factor of 0.3 has been met through greening measures.

Reason: To ensure that the development provides the maximum provision towards the urban greening of the local environment, creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

External Lighting

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

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

Boundary Treatment

21. Above ground works must not commence until details of the proposed boundary treatment have been submitted to and approved in writing by the Local Planning Authority. This should include the proposed layout, materials and colours for the full site boundary and any internal fencing/gates.

The approved boundary treatment must be implemented prior to first use of the site and maintained for the lifetime of the development.

Reason: To ensure that boundary treatment is of a high-quality, and successfully responds to the context of the site.

Noise

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

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

Delivery and Servicing Plan

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

Reason: To set out the proposed delivery and servicing strategy for the development, including the predicted impact of the development upon the local

highway network and both physical infrastructure and day-to-day policy and management mitigation measures. To ensure that delivery and servicing activities are adequately managed such that the local community, the pedestrian, cycle and highway networks and other highway users experience minimal disruption and disturbance. To enable safe, clean and efficient deliveries and servicing.

Section 278 (Highway Works) Agreement

24. Before works commence on site to implement the development, the developer shall provide detailed of the existing road surface condition including the footways and bell mouth access. Before the scheme is occupied the developer will be required to submit details of the condition of the highways to the Local Planning Authority.

Reason: To ensure the highway works are undertaken to a high-level of standards and in accordance with the Council's requirements.

Informatives:

INFORMATIVE: NPPF

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

INFORMATIVE : CIL

Based on the information given on the plans, the Mayoral CIL charge will be £300,932.10 (4,662sqm x £64.55) but there will be no Haringey CIL charge as this would not be within the chargeable use classes. This will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index.

INFORMATIVE: NPPF

In dealing with this application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our pre application advice service and published development plan, comprising the London Plan 2021, the Haringey Local Plan 2017 along with relevant SPD/SPG

documents, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

INFORMATIVE: Land Ownership

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

INFORMATIVE: Hours of Construction Work

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

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

INFORMATIVE: 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: London Fire Brigade

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

INFORMATIVE: Thames Water

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

prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

INFORMATIVE:

The Applicant is advised that 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.

Appendix 3 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Design Officer	<p><u>Site Context</u></p> <p>The site is in the centre of an established industrial area, protected with a Strategic Industrial Location (SIL) planning designation, surrounded by other active industrial buildings. Most of these immediate neighbours are in the 1-3 storey height range, but recent permissions for neighbouring sites immediately south of this application site have granted permission for new industrial buildings of four storeys (HGY/2022/0081). It should also be noted that all these industrial buildings' floor heights are greater than would be typical in residential buildings.</p> <p>Of more significance, immediately east of the application site, across Watermead Way, a major north-south dual carriageway road, is a very large, tall and imposing electricity switching station, with a main building of equivalent to at least 6 industrial floors, and with a dense cluster of much taller electricity pylons. Overall, it presents an ugly, imposing, industrial and utilitarian great mass on the skyline for widely about the site.</p> <p>Beyond the industrial estate and electricity installation to the east is Tottenham Marshes, a naturally landscaped park containing some large, grassed areas, part of the Lee Valley Regional Park. From within the park, long views, including of the switching station and pylons, can be seen to the west and north-west, as well as the more</p>	Support noted.

Stakeholder	Question/Comment	Response
	<p>distant high-rise developments around Tottenham Hale and Blackhorse Road to the south, whilst views in other directions, and in any direction from within or close to its significant wooded areas are purely natural.</p> <p>South of the industrial estate is an area of allotments followed by a bus depot and tube depot. The Lee Valley railway line forms the western edge of the industrial estate, beyond which is residential, with a mixture of two and three storey terraces and medium and higher rise flatted blocks, although they are some distance from the site and generally turn their backs on the railway and the industry beyond. The northern boundary of the industrial estate is also the borough boundary. Immediately north and stretching east and west of the railway and dual carriageway, is LB Enfield's Meridien Water development, a major masterplanned high density, high rise, mixed use redevelopment, including clusters of high-rise buildings amongst a generally six-eight storey "mansion block" datum. Developments that have been granted planning permission within Meridien Water include a cluster of high-rise point blocks surrounded by mid-rise mansion blocks immediately west of the railway at the new Meridien Water Station and a mid-rise masterplanned development to the east.</p> <p><u>Proposed Design and Appearance</u></p> <p>The proposals in this planning application are for a self-storage building on five floors, albeit of tall storey heights. In pre-application discussions, including with the design officer, officers agreed that the site was</p>	

Stakeholder	Question/Comment	Response
	<p>suitable for such a development in principle, noting amongst other things that self-storage is compatible with industrial uses, has been shown in studies to generate significant employment, and would have excellent accessibility, by road from the adjacent Watermead Way dual carriageway and by rail from the two nearby stations at Northumberland Park and Meridien Water.</p> <p>Design advice to simplify the form of the proposal, to give it a more elegant, less complex and visually jarring appearance, and to significantly tone down the colour scheme proposed for the external cladding, has been fully followed. The applicants consider strong, visually arresting signage on the exterior cladding to be an important part of their business model, but the site location beside Watermead Way, at its junction with Sedge Road, which forms the northern edge of the site, gives the proposed development sufficient visibility for a toned-down corporate signage, less dominated by the colour red. Notwithstanding that, a fairly lively external appearance, as proposed, is not incompatible with the vibrant mix of existing industrial buildings , signs and advertising boards in the immediate context.</p> <p>The proposed design is utilitarian but enlivened by landscaped edges and provided with clear, legible approach and entrances that will accommodate pedestrian and cycle access mas well and to greater prominence than vehicle access. Small landscaped external amenity spaces are included for staff and visitors, and the proposals avoid the use of ugly, alienating external boundary fences, any ugly and</p>	

Stakeholder	Question/Comment	Response
	<p>unsustainable large expanses of surface parking / delivery bays (they being accommodated under the building) or any “forgotten” left-over spaces.</p> <p><u>Local and more distant Views</u></p> <p>The Vu.City model views demonstrate as officers thought, that this proposal will be compatible in height, bulk and massing with the existing and emerging context. In particular it will be of comparable height and mass, albeit less bulk due to its shorter width, to the electricity installation. Views 1 and 2 show its similarity, with the latter, from the edge of the marshes, showing it will not be more impactful than the existing electricity installation in any views from the park, whilst the view looking north-west up Watermead Way (View 4) demonstrates this and also shows how they will frame a view of the more distant point block in Meridien Water.</p> <p>View 6, looking up Garman Road from the south shows how it represents a gradual build up in height, of one additional storey on each of the (fairly large) plots along the east side of Garman Road, along with its immediate neighbouring recently permitted developments, from the existing 2 storey industrial buildings at the southern end of the street. This view also shows the greater heights permitted in Meridien Water, whilst the more distant Views 7 a& 8 show how the greater height of the wider masterplanned developments both there and to the south will leave the Garman Road area still at significantly lower height.</p>	

Stakeholder	Question/Comment	Response
	<p><u>Conclusions</u></p> <p>These proposals are considered acceptable in design terms for a location with low sensitivity and already with significant height, bulk and mass, trending in the direction of being further redeveloped at similar heights, and with much greater height not far away. A number of recent studies have demonstrated that employment generation, industrial uses can and increasingly must be accommodated in higher density, over multiple storeys, to maintain and expand industrial employment and essential services provision, and to aid in the transition to more sustainable, less car intensive transport use. This development, whilst not being a piece of particularly “beautiful”, exceptional or sophisticated architecture, should be striking, functional, compatible with its location and of no harm to any more sensitive areas.</p>	
Transportation	<p><u>HGY/2022/2293 - 45-47 Garman Road London N17 0UN</u></p> <p>Redevelopment of the site to provide a self-storage facility (Use Class B8) with associated car and cycle parking, refuse storage, landscaping and other associated works ancillary to the development.</p> <p><u>Location and access</u></p> <p>This site is located to the eastern side of Garman Road, on the southern side of the junction of Garman Road with Sedge Road.</p> <p>It has a PTAL value of 3, considered ‘moderate’ access to public transport services. 4 different bus services are</p>	<p>Noted conditions 9 and 10 including obligation attached requesting details of (CMP) and (Cycling parking details).</p>

Stakeholder	Question/Comment	Response
	<p>accessible within 2 to 5 minutes walk of the site, and Northumberland Park Railway Station is a 5-minute walk away.</p> <p>It is also located within the Tottenham Hotspur event day CPZ, which operates on match evenings and days when there are events at the Tottenham Hotspur Stadium.</p> <p><u>Existing use and arrangements</u> The existing Site measures approximately 0.25ha and currently comprises a single-storey warehouse in industrial/retail use with ancillary office/welfare floorspace. There is a single highway crossover/access into the site close to the junction of Garman/Sedge.</p> <p><u>Development proposal</u> The Proposed Development comprises the demolition of the existing building on site and redevelopment to provide a self-storage facility (Use Class B8), which is to be operated by Shurgard UK Ltd, who have a number of similar operations throughout the Country. This is proposed to be over three levels, to include an office/shop for the development at ground level and the remainder for hired storage usage. There is reference to the use of demountable mezzanine floors to provide the ability to accommodate up to 11,426 SQM (internal area) within the proposed building. The development will initially have a floor area of 6254 sqm but for transport terms has been assessed on the basis of the potential 11426 sqm configuration.</p>	

Stakeholder	Question/Comment	Response
	<p>There is reference to 3 employees working at the site once operational, which is the operational norm for premises such as these.</p> <p><u>Transportation considerations</u> A transport assessment accompanies this application for this proposal. The main topics for consideration are as follows;</p> <p><u>Access, Parking and trip generation</u> The existing access off Garman Road will be retained, it is not proposed to make any physical changes to it. Appropriate reinstatement will be required should the construction process damage existing highway infrastructure. There will be a gate arrangement within the site, which will provide a secure area within which there will be 6 car parking spaces plus a bay for vans up to 7.5 tonne which is the largest van operationally likely to visit the site. This will be for customers making deposits or retrievals from the storage facility. Long stay cycle parking including cargo bike parking will also be in this area.</p> <p>There will also be 3 bays for visitors in between the access gate and site entrance along with visitor cycle parking. Two of the car parking bays will be EVCP bays with active charging facilities plus two will be blue badge bays with larger dimensions.</p> <p>The proposed levels of car parking both suit the likely operational requirements of the development and are within the range of provision prescribed by the London</p>	

Stakeholder	Question/Comment	Response
	<p>Plan (up to 1 space per 100 sqm for outer London).</p> <p>The car parking demands of the development should be met within the site, actual demands will be very low given the numbers of trips generated by operations of this type. The TA details that in the AM peak there will be 7 two way vehicle trips and 6 within the PM peak. There are no on street parking demand impacts expected from this Proposal.</p> <p><u>Cycle parking</u> 10no. short-stay, plus 10 no. long-stay cycle (including 4 cargo bike parking spaces) will be provided. This meets the requirements of the London Plan. The arrangements need to be sufficiently secure and weatherproof and should be designed in accordance with the London Cycles Design standards as produced by TfL. Dimensioned and detailed drawings demonstrating this and the manufacturer's installation specifications will be required and this can be covered by condition.</p> <p><u>Delivery and servicing</u> Numbers of delivery and servicing trips will be very low and there is the ability to accommodate car/vans and trucks up to 7.5 tonne within the site.</p> <p><u>Refuse and recycling</u> Refuse storage will be on the ground floor and the TA detail expected pick up will be from Garman Road. Colleagues in the Haringey Waste Team will need to confirm if storage and collection arrangements meet standards.</p>	

Stakeholder	Question/Comment	Response
	<p><u>Travel Plan</u> A draft travel plan has been included in the application. This appears sound. A nominal Travel Plan monitoring fee will be appropriate to cover officer time to be spent on assessing updates and survey information, reviews, and liaison with the travel plan co-ordinator. If there is a S106 for this application this can be covered within that agreement.</p> <p><u>Construction Phase</u> A draft CEMP is included within the application. This provides some useful details. A 48 week build out is proposed, up to 3 construction vehicles a day will attend site, and it is detailed all materials and plant and site operations will take place within the hoarded boundary of the site.</p> <p>A CEMP/CLP can be conditioned, to also include details of arrangements to minimise the impact on both the Public Highway and adjacent neighbours. This will include deliveries and collections being made outside of the peak AM and PM periods, and full details of any temporary measures envisaged for the highway. The applicant should engage with the Borough's Network Managers to agree the scope of any temporary arrangements on the highway, and the outcomes of these discussions should inform the CLP.</p> <p><u>Summary</u> This application is for redevelopment of the industrial site at 45 – 47 Garman Road to provide a private storage</p>	

Stakeholder	Question/Comment	Response
	<p>facility for Shurgard.</p> <p>Overall, it appears that this should not create any adverse transportation impacts, overall transport demands will be low, there should be no external car parking demands generated, and appropriate provision of cycle parking will be included.</p> <p>Subject to the following conditions no objections to this application from the transportation perspective.</p> <ul style="list-style-type: none"> • Cycle parking details • Construction Logistics Plan <p>If a S106 is in place this can cover the travel plan monitoring fee.</p>	
Carbon Management	<p>Carbon Management Response 25/11/2022</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy Statement v5 prepared by Ensphere (dated July 2022) • Thermal Comfort Analysis prepared by Ensphere (dated July 2022) • Sustainability Statement v4 prepared by Ensphere (dated July 2022) • Whole Life Cycle Carbon Assessment v5 prepared by Ensphere (dated July 2022) • Circular Economy Statement v5 prepared by Ensphere (dated July 2022) • Relevant supporting documents. 	No objection subject to conditions and obligations

Stakeholder	Question/Comment	Response
	<p>1. Summary</p> <p>Overall, it is considered that the application is not fully policy compliant. It currently does not meet London Plan Policy SI2 as the Energy Strategy was submitted under the new Building Regulations which have not yet been implemented by the GLA. The Thermal Comfort Analysis also does not fully meet the requirements set out by Haringey. It also does not meet Policy G5 as not Urban Greening Factor calculation was submitted.</p> <p>However, the application can be supported in principle as it demonstrates that is reducing carbon emissions from the notional building and delivering sustainability benefits. However, in order to make this application acceptable, a number of planning conditions should be secured which have been included below.</p> <p>It is noted that a number of actions are listed in this response, these should be dealt with when the applicant discharges their pre-commencement conditions.</p> <p>2. Energy – Overall</p> <p>Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L. The London Plan (2021) further confirms this in Policy SI2. The GLA have clarified that new applications should still be reporting their reduction in carbon emissions under Part L 2013. This scheme has submitted calculations under Part L 2021, however, which is not policy compliant.</p>	

Stakeholder	Question/Comment	Response																																				
	<p>The overall predicted reduction in CO₂ emissions for the development shows an improvement of approximately 54% in carbon emissions with SAP10.2 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 4.9 tonnes of CO₂ from a baseline of 9 tCO₂/year.</p> <p>London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are: 1.6 tCO₂.</p> <table border="1" data-bbox="575 706 1377 1411"> <thead> <tr> <th colspan="4" data-bbox="575 706 1377 816"><i>Non-residential (SAP10.2 emission factors) – before the implementation of Part L 2021 in planning policy terms</i></th> </tr> <tr> <th data-bbox="575 816 808 1003"></th> <th data-bbox="808 816 1001 1003">Total regulated emissions (Tonnes CO₂ / year)</th> <th data-bbox="1001 816 1171 1003">CO₂ savings (Tonnes CO₂ / year)</th> <th data-bbox="1171 816 1377 1003">Percentage savings (%)</th> </tr> </thead> <tbody> <tr> <td data-bbox="575 1003 808 1076">Part L 2021 baseline</td> <td data-bbox="808 1003 1001 1076">9</td> <td data-bbox="1001 1003 1171 1076"></td> <td data-bbox="1171 1003 1377 1076"></td> </tr> <tr> <td data-bbox="575 1076 808 1115">Be Lean</td> <td data-bbox="808 1076 1001 1115">7.6</td> <td data-bbox="1001 1076 1171 1115">1.4</td> <td data-bbox="1171 1076 1377 1115">16%</td> </tr> <tr> <td data-bbox="575 1115 808 1154">Be Clean</td> <td data-bbox="808 1115 1001 1154">7.6</td> <td data-bbox="1001 1115 1171 1154">0</td> <td data-bbox="1171 1115 1377 1154">0%</td> </tr> <tr> <td data-bbox="575 1154 808 1193">Be Green</td> <td data-bbox="808 1154 1001 1193">4.1</td> <td data-bbox="1001 1154 1171 1193">3.5</td> <td data-bbox="1171 1154 1377 1193">38%</td> </tr> <tr> <td data-bbox="575 1193 808 1266">Cumulative savings</td> <td data-bbox="808 1193 1001 1266"></td> <td data-bbox="1001 1193 1171 1266">4.9</td> <td data-bbox="1171 1193 1377 1266">54%</td> </tr> <tr> <td data-bbox="575 1266 808 1377">Carbon shortfall to offset (tCO₂)</td> <td data-bbox="808 1266 1001 1377">4.1</td> <td data-bbox="1001 1266 1171 1377"></td> <td data-bbox="1171 1266 1377 1377"></td> </tr> <tr> <td data-bbox="575 1377 808 1411">Carbon</td> <td colspan="3" data-bbox="808 1377 1377 1411">£95 x 30 years x 4.1 tCO₂/year =</td> </tr> </tbody> </table>	<i>Non-residential (SAP10.2 emission factors) – before the implementation of Part L 2021 in planning policy terms</i>					Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)	Part L 2021 baseline	9			Be Lean	7.6	1.4	16%	Be Clean	7.6	0	0%	Be Green	4.1	3.5	38%	Cumulative savings		4.9	54%	Carbon shortfall to offset (tCO₂)	4.1			Carbon	£95 x 30 years x 4.1 tCO ₂ /year =			
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Stakeholder	Question/Comment		Response					
	offset contribution	£11,685 (TBC)						
	10% management fee	£1,168						
	<p><u>Actions:</u></p> <ul style="list-style-type: none"> - Please submit the GLA's Carbon Emission Reporting Spreadsheet (appended to the GLA Energy Assessment Guidance 2020). - The applicant should be revising their calculations to Part L 2013 to be policy compliant and calculate their carbon offset contribution on that basis. - As the applicant has modelled under Part L 2021, they should also report the Primary Energy Factor and Energy Use Intensity. - <p>Energy – Lean</p> <p>The applicant has proposed a saving of 1.4 tCO₂ in carbon emissions (16%) through improved energy efficiency standards in key elements of the build, based on SAP10.2 carbon factors. This goes beyond the minimum 15% reduction respectively set in London Plan Policy SI2, so this is supported.</p> <p>The following u-values, g-values and air tightness are proposed:</p> <table border="1" data-bbox="575 1295 1375 1401"> <tr> <td data-bbox="575 1295 915 1334">Floor u-value</td> <td data-bbox="921 1295 1375 1334">0.12 W/m²K</td> </tr> <tr> <td data-bbox="575 1339 915 1378">External wall u-value</td> <td data-bbox="921 1339 1375 1378">0.20 W/m²K</td> </tr> <tr> <td data-bbox="575 1383 915 1408">Roof u-value</td> <td data-bbox="921 1383 1375 1408">0.12 W/m²K</td> </tr> </table>			Floor u-value	0.12 W/m ² K	External wall u-value	0.20 W/m ² K	Roof u-value
Floor u-value	0.12 W/m ² K							
External wall u-value	0.20 W/m ² K							
Roof u-value	0.12 W/m ² K							

Stakeholder	Question/Comment		Response
	Window u-value	1.40 W/m ² K	
	Air permeability rate	3 m ³ /hm ² @ 50Pa	
	Ventilation strategy	Natural ventilation Mechanical ventilation with heat recovery for office areas	
	Thermal bridging	Accredited Construction Details	
	Low energy lighting	140 l/W	
	<p>Overheating is dealt with in more detail below.</p> <p>Energy – Clean London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs.</p> <p>The applicant is not proposing any Be Clean measures. The site is not within reasonable distance of a proposed Decentralised Energy Network (DEN). A Combined Heat and Power (CHP) plant would not be appropriate for this</p>		

Stakeholder	Question/Comment	Response
	<p>site.</p> <p>Energy – Green As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.</p> <p>The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 3.5 tCO₂ (38%) reduction of emissions are proposed under Be Green measures. The solar array peak output would be 30 kWp (confirmed in the DAS, not ES).</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - The ES does not provide enough detail on the proposed solar PV system and ASHP heating strategy. This detail needs to be submitted as part of the pre-commencement condition to demonstrate that this scheme’s heating strategy is sufficient. <p>Energy – Be Seen London Plan Policy SI2 requests all developments to ‘be seen’, to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured</p>	

Stakeholder	Question/Comment	Response
	<p>energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies.</p> <p>The applicant should install metering equipment on site.</p> <ul style="list-style-type: none"> - Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform) <p>3. Carbon Offset Contribution A carbon shortfall of 4.1 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years.</p> <p>4. Overheating London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.</p> <p>In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM52 with</p>	

Stakeholder	Question/Comment	Response												
	<p>TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled the office space under the London Heathrow files.</p> <p>Results are listed in the table below.</p> <table border="1" data-bbox="575 451 1377 787"> <thead> <tr> <th data-bbox="575 451 968 490"></th> <th data-bbox="968 451 1377 490">Passes TM52</th> </tr> </thead> <tbody> <tr> <td data-bbox="575 490 968 529">DSY1 2020s (base case)</td> <td data-bbox="968 490 1377 529">Fails</td> </tr> <tr> <td data-bbox="575 529 968 602">DSY1 2020s (mechanical ventilation)</td> <td data-bbox="968 529 1377 602">Fails</td> </tr> <tr> <td data-bbox="575 602 968 675">DSY1 2020s (comfort cooling)</td> <td data-bbox="968 602 1377 675">Passes</td> </tr> <tr> <td data-bbox="575 675 968 714">DSY1 2050s (base case)</td> <td data-bbox="968 675 1377 714">Fails</td> </tr> <tr> <td data-bbox="575 714 968 787">DSY1 2050s (comfort cooling)</td> <td data-bbox="968 714 1377 787">Passes</td> </tr> </tbody> </table> <p><u>Overheating Actions:</u></p> <ul style="list-style-type: none"> - Redo the overheating modelling with the Central London weather file, which will more accurately represent the urban heat island effect. - The applicant has not modelled DSY 2 or 3 for the development. Please also model these and ensure the design has incorporated as many mitigation measures to pass DSY 2 and 3 as feasible. Any remaining overheating should inform the future retrofit plan. - Confirm who will own the overheating risk when the building is occupied (not the residents). - What is the active cooling demand (space 		Passes TM52	DSY1 2020s (base case)	Fails	DSY1 2020s (mechanical ventilation)	Fails	DSY1 2020s (comfort cooling)	Passes	DSY1 2050s (base case)	Fails	DSY1 2050s (comfort cooling)	Passes	
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Stakeholder	Question/Comment	Response
	<p>cooling, not energy used) on an area-weighted average in MJ/m² and MY/year? Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point / any renewable sources.</p> <p>5. Sustainability Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design.</p> <p><i>Non-Domestic BREEAM Requirement</i> Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.</p> <p>The applicant has prepared a BREEAM Pre-Assessment Report. Based on this report, a score of 71% is expected to be achieved, equivalent to 'Excellent' rating.</p> <p><i>Living roofs</i> All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5.</p>	

Stakeholder	Question/Comment	Response
	<p>The development is proposing living roofs in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth.</p> <p>Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition.</p> <p><i>Urban Greening / Biodiversity</i></p> <p>All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff.</p>	

Stakeholder	Question/Comment	Response
	<p>No Urban Greening Factor calculation was submitted, which is not policy compliant.</p> <p>Whole Life Carbon Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.</p> <p>This application is not required to submit a full statement. A WLC assessment was submitted, but it does not summarise the results in kgCO₂/m² and report against GLA benchmarks and aspirational targets or the LETI targets.</p> <p>Circular Economy Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.</p> <p>6. This application is not required to submit a full statement. A CES was submitted as part of the application, which is supported. Planning Conditions To be secured:</p> <p><u>Energy Strategy</u></p>	

Stakeholder	Question/Comment	Response
	<p><i>(a) Prior to above ground construction, a revised Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:</i></p> <ul style="list-style-type: none"> - <i>Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy, in line with Part L 2013;</i> - <i>Confirmation of the necessary fabric efficiencies to achieve a minimum 15% reduction in emissions, including details to reduce thermal bridging;</i> - <i>Location, specification and efficiency of the proposed ASHPs, their heating and cooling loads where relevant (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;</i> - <i>Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;</i> - <i>Details of the PV, demonstrating that a minimum of 200 sqm of the roof has been utilised and located to avoid any overshadowing, delivering a minimum 30 kWp array 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);</i> - <i>A metering strategy.</i> <p><i>The development shall be carried out strictly in</i></p>	

Stakeholder	Question/Comment	Response
	<p><i>accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.</i></p> <p><i>(b) Within six months of first occupation, evidence that the solar PV and ASHPs installations have been installed correctly shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, a six-month energy generation statement, and a Microgeneration Certification Scheme certificate.</i></p> <p><i>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.</i></p> <p><u><i>Be Seen</i></u></p> <p><i>(a) Prior to the completion of the superstructure a detailed scheme for energy monitoring has been submitted to and approved in writing by the Local Planning Authority. This shall include details of suitable automatic meter reading devices for the monitoring of energy use and renewable/low carbon energy generation. The monitoring mechanisms approved in the monitoring strategy shall be made available for use prior to the first occupation of each building.</i></p> <p><i>(b) Prior to each Building being occupied, the Owner shall provide updated accurate and verified 'as-built'</i></p>	

Stakeholder	Question/Comment	Response
	<p><i>design estimates of the ‘Be Seen’ energy performance indicators for each Reportable Unit of the development, as per the methodology outlined in the ‘As-built stage’ chapter / section of the GLA ‘Be Seen’ energy monitoring guidance.</i></p> <p><i>(c) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the approved Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant involvement to evidence this training and engagement.</i></p> <p><i>(d) Upon completion of the first year of Occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each Reportable Unit of the development as per the methodology outlined in the ‘In-use stage’ chapter / section of the GLA ‘Be Seen’ energy monitoring guidance document (or any document that may replace it).</i></p> <p><i>All data and supporting evidence should be submitted to the GLA using the ‘Be Seen’ reporting webform (https://www.london.gov.uk/what-</i></p>	

Stakeholder	Question/Comment	Response
	<p>wedo/planning/implementing-london-plan/london-plan-guidance-and-spqs/be-seen-energymonitoring-guidance).) If the 'In-use stage' evidence shows that the 'As-built stage' performance estimates have not been or are not being met, the Owner should investigate and identify the causes of underperformance and the potential mitigation measures and set these out in the relevant comment box of the 'Be Seen' in-use stage reporting webform. An action plan comprising measures shall be submitted to and approved in writing by the GLA, identifying measures which would be reasonably practicable to implement and a proposed timescale for implementation. The action plan and measures approved by the GLA should be implemented by the Owner as soon as reasonably practicable.</p> <p><i>REASON: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2021 Policy SI 2 and Local Plan Policy SP4 before construction works prohibit compliance.</i></p> <p><u>Overheating</u></p> <p><i>Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This report shall include:</i></p> <ul style="list-style-type: none"> - <i>Revised modelling of units modelled based on CIBSE TM52, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s, high emissions, 50% percentile;</i> 	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> - <i>Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy, demonstrating that any noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures;</i> - <i>Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;</i> - <i>Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;</i> - <i>Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.</i> <p><i>The development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development.</i></p> <p><i>REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><u><i>Living roofs</i></u></p>	

Stakeholder	Question/Comment	Response
	<p><i>(a) Prior to the above ground commencement of development, details of the living roof must be submitted to and approved in writing by the Local Planning Authority. Living roof must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:</i></p> <p><i>i) A roof plan identifying where the living roof will be located;</i></p> <p><i>ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm);</i></p> <p><i>iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate</i></p> <p><i>iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays;</i></p> <p><i>v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with roof ball of plugs 25m³) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);</i></p>	

Stakeholder	Question/Comment	Response
	<p><i>vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and vii) Management and maintenance plan, including frequency of watering arrangements. (b) Prior to the occupation of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.</i></p> <p><i>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i></p> <p><u><i>Urban Greening Factor</i></u> <i>Prior to completion of the construction work, an Urban Greening Factor calculation should be submitted to and approved by the Local Planning Authority demonstrating a target factor of 0.3 has been met through greening measures.</i></p> <p><i>Reason: To ensure that the development provides the</i></p>	

Stakeholder	Question/Comment	Response
	<p><i>maximum provision towards the urban greening of the local environment, creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i></p> <p><u>BREEAM</u></p> <p><i>(a) Prior to commencement on site, a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “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.</i></p> <p><i>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.</i></p> <p><i>(b) Within six months following occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.</i></p> <p><i>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</i></p>	

Stakeholder	Question/Comment	Response
	<p><i>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.</i></p> <p><i>Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.</i></p> <p>7. Planning Obligations Heads of Terms</p> <ul style="list-style-type: none"> - Energy Plan and Sustainability Review - Estimated carbon offset contribution (and associated obligations) of £11,685 (indicative), plus a 10% management fee to be recalculated using Part L 2013 software, based on £2,850 per tonne of carbon emissions. 	
Waste Management	<p>Due to the nature of this facility, the refuse and recycling area is relatively small as no customers are permitted to leave any waste and there is only a small office / shop on site. The proposed refuse and recycling bins meet the specified storage requirements and the proposed collection point on Garman Rd is acceptable.</p> <p>.</p>	Noted, condition attached accordingly.
Building Control	From the plans submitted, the following queries have been raised;	Comments noted. Additional information submitted by the applicant in addressing the

Stakeholder	Question/Comment	Response
	<ol style="list-style-type: none"> 1. Please provide plans showing the Fire Brigade hose length runs to the furthest room. 2. No cross corridor doors have been shown on the floor plans. 3. No smoke detectors, alarms sounders, emergency lighting points, call points or exit signage indicated on plan. 4. The distance of the relevant boundary, from each elevation, not indicated. 	<p>points raised. As such the Council's Building control service are reviewing these documents. If additional conditions are required – these will be reported through an addendum.</p> <p>The additional information shows that the Fire Brigade hose length runs to the furthest room, compartments sizes are below 2000 sqm therefore cross corridor door on plans are not required, provides details of smoke detectors, alarm sounders, emergency lighting points, call points or exit signage and provides the distance from the relevant boundary from each elevation.</p>
<p>Flood & Water Management</p>	<p>Having reviewed the applicant's submitted Flood Risk Assessment document reference number 24318-HYD-XX-XX-RP-FR-000 dated 13th June 2022 along with Drainage Strategy document reference number Doc ref: 24318-HYD-XX-XX-RP-C-700 dated 1st August 2022 prepared by Hydrock Consultant, we are generally content with the overall methodology as mentioned within the above documents, subject to following planning conditions to be implemented regarding the Surface water Drainage Strategy and it's management and maintenance plan.</p> <p><u>Surface Water Drainage condition</u></p> <p>No development shall take place until a detailed Surface</p>	<p>Noted and conditions included as required.</p>

Stakeholder	Question/Comment	Response
	<p>Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate that :</p> <ul style="list-style-type: none"> a) The surface water generated by this development for all the rainfall durations starting from 15 min to 10080 min (7 days not 1 day) and intensities up to and including the climate change adjusted critical 100 years storm can be accommodated and disposed of without discharging onto the highway and without increasing flood risk on or off-site. b) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method. c) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development. d) The development shall not be occupied until the Sustainable Drainage Scheme for the site has been completed in accordance with the approved details and thereafter retained. <p>Reason: To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter.</p> <p><u>Management and Maintenance condition</u></p> <p>Prior to occupation of the development hereby approved,</p>	

Stakeholder	Question/Comment	Response
	<p>a detailed management maintenance plan for the lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained.</p> <p>REASON: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system</p>	
Pollution Air Quality	<p>Having considered all the submitted supportive information, please be advised that we have no objection to the development in relation to AQ and Land Contamination but planning conditions are recommended should planning permission be granted considering the site is located on an unspecified factory work of medium risk and within a close proximity of other contaminated land use sites.</p>	Noted conditions attached.
EXTERNAL		
Thames Water	<p>With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021.</p> <p>Where the developer proposes to discharge to a public</p>	Noted, informative attached.

Stakeholder	Question/Comment	Response
	<p>sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.</p> <p>https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes</p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.</p> <p>https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-</p>	

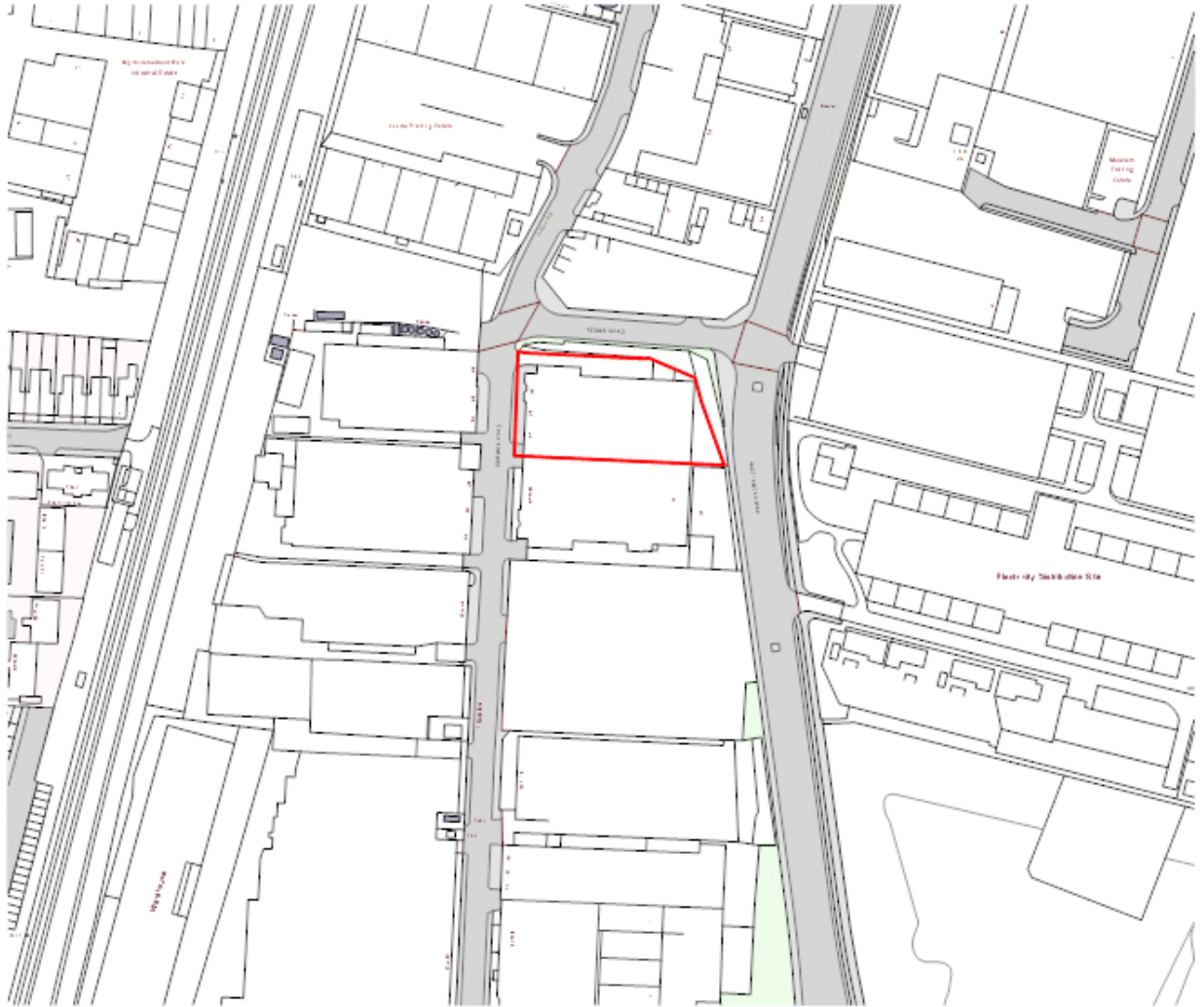
Stakeholder	Question/Comment	Response
	<p data-bbox="573 235 1356 302">our-pipes Should you require further information please contact Thames Water.</p> <p data-bbox="573 344 1377 488">Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p data-bbox="573 527 1377 816">There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.</p> <p data-bbox="573 855 1377 1036">Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p data-bbox="573 1075 823 1105">Water Comments</p> <p data-bbox="573 1144 1377 1398">There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we</p>	

Stakeholder	Question/Comment	Response
	<p>provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.</p> <p>https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>	
<p>Cllr Bevan</p>	<p>Comments: I am the Cllr responsible for responding to planning issues within this ward, I have visited the above address and my comments are below and are based on my observations and local knowledge during my 20 years as a Cllr for this ward.</p> <p>In addition, I now refer to the MAYOR of London's Supplementary Planning Guidance in particular I would require that this proposal will comply with the above guidance standards and indeed building regulations.</p>	<p>Building Control concerns have been addressed.</p>

Stakeholder	Question/Comment	Response
	<p>I am seeking some uniformity in this development of this whole site, with the nearby adjacent sites that are also being developed. This to be considered prior to approval of this application and how this application would permit and enhance this aspiration.</p> <p>I would draw attention to the industrial estate on Leaside Road, N17 0QJ, the Mowlem estate which has recently been developed and is to a very high standard in many respects. I would request that this development achieve the same high standards, including the green fencing, which ensures to some extent that the site does not look like a prison site. Assuming of course that fencing will be required for this development</p> <p>I appreciate that this is an industrial site, but I refer to the need for improved design and attractiveness that is now required by Haringey and The Mayor of London for all applications.</p> <p>I note that the street scene at this location is very degraded the boundary with SEDGE ROAD Japanese knotweed issues, temporary eyesore metal fencing in place, been like this for many years. The whole street scene around this site needs to be upgraded, even more so considering the traffic issues at this corner junction, junction needs to be reconfigured.</p> <p>I have concerns that this aspiration for improved design has not been achieved with this application.</p>	<p>Design and comprehensive development addressed in para 6.5 – 6.5.11. The proposal reflects and complements existing permissions in Garman Road.</p> <p>A condition has been attached requiring details of fencing.</p> <p>A condition is attached requiring materials to be submitted for approval.</p> <p>High quality landscaping is proposed at the junction of Sedge Road and Watermead Way.</p>

Appendix 2 Plans and Images

Location Plan



Aerial photo of the site and its surroundings



Photographic View – West Elevation



West Elevation



View of the existing north Sedge Road



View from roundabout on north-west corner



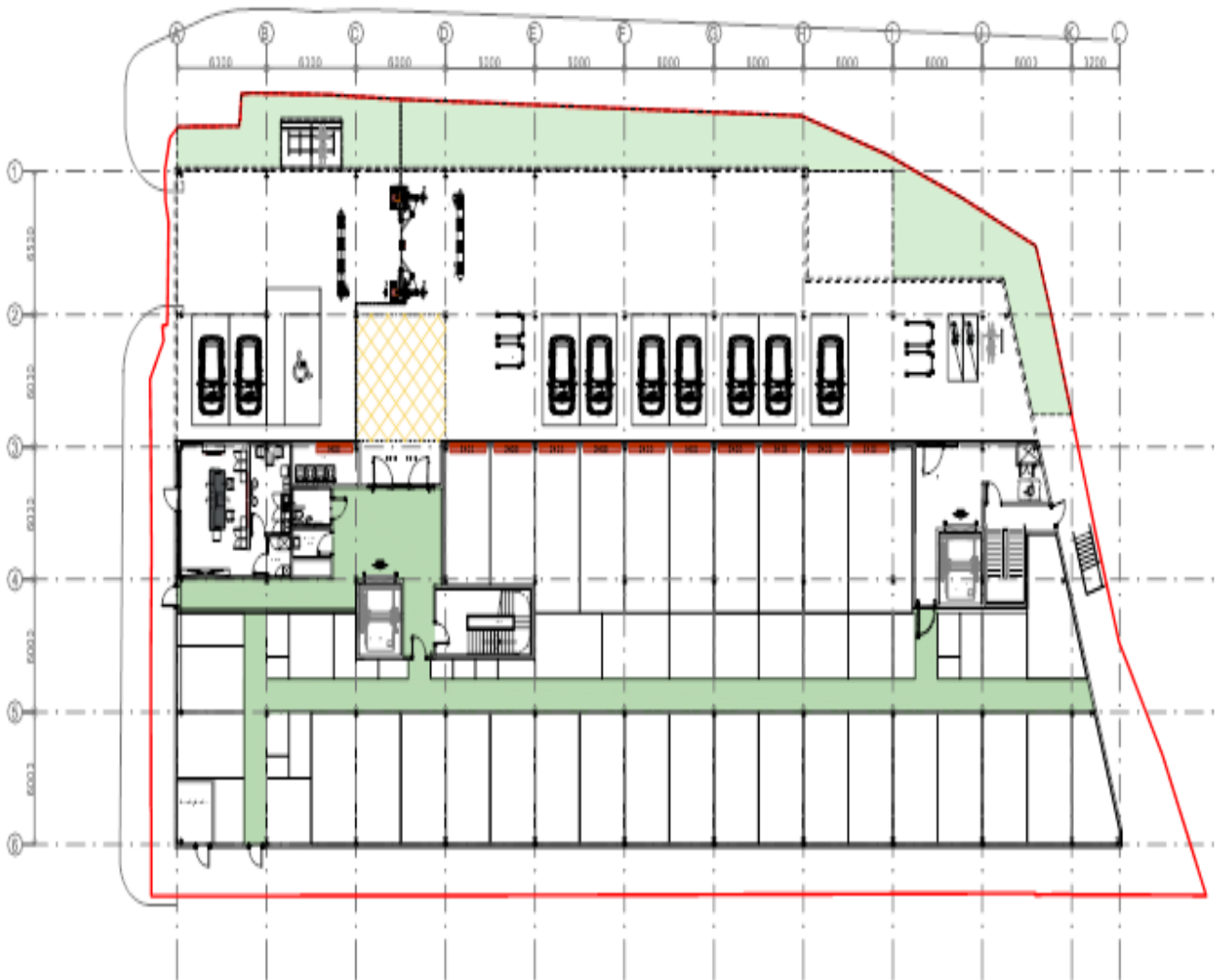
West Elevation



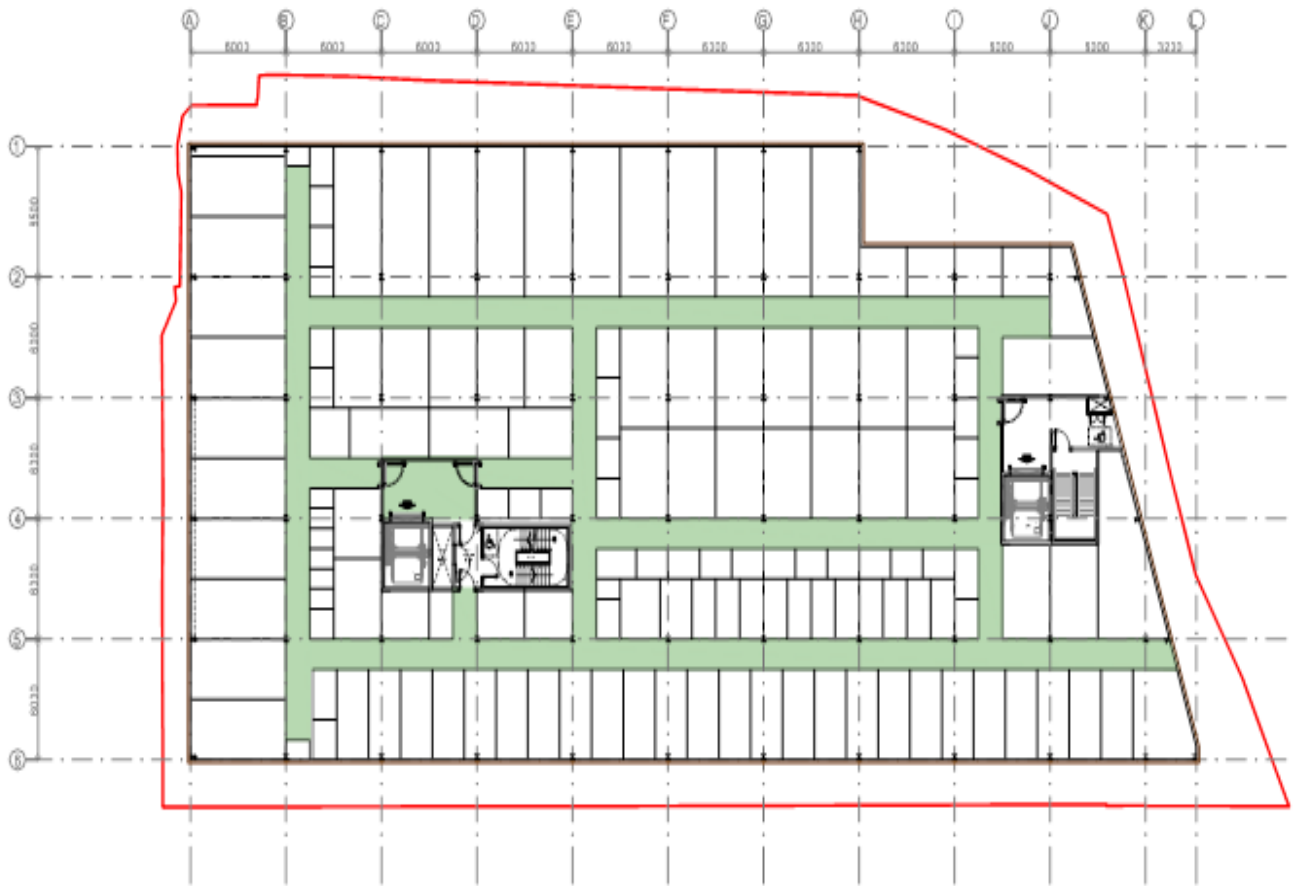
Proposed Site Plan



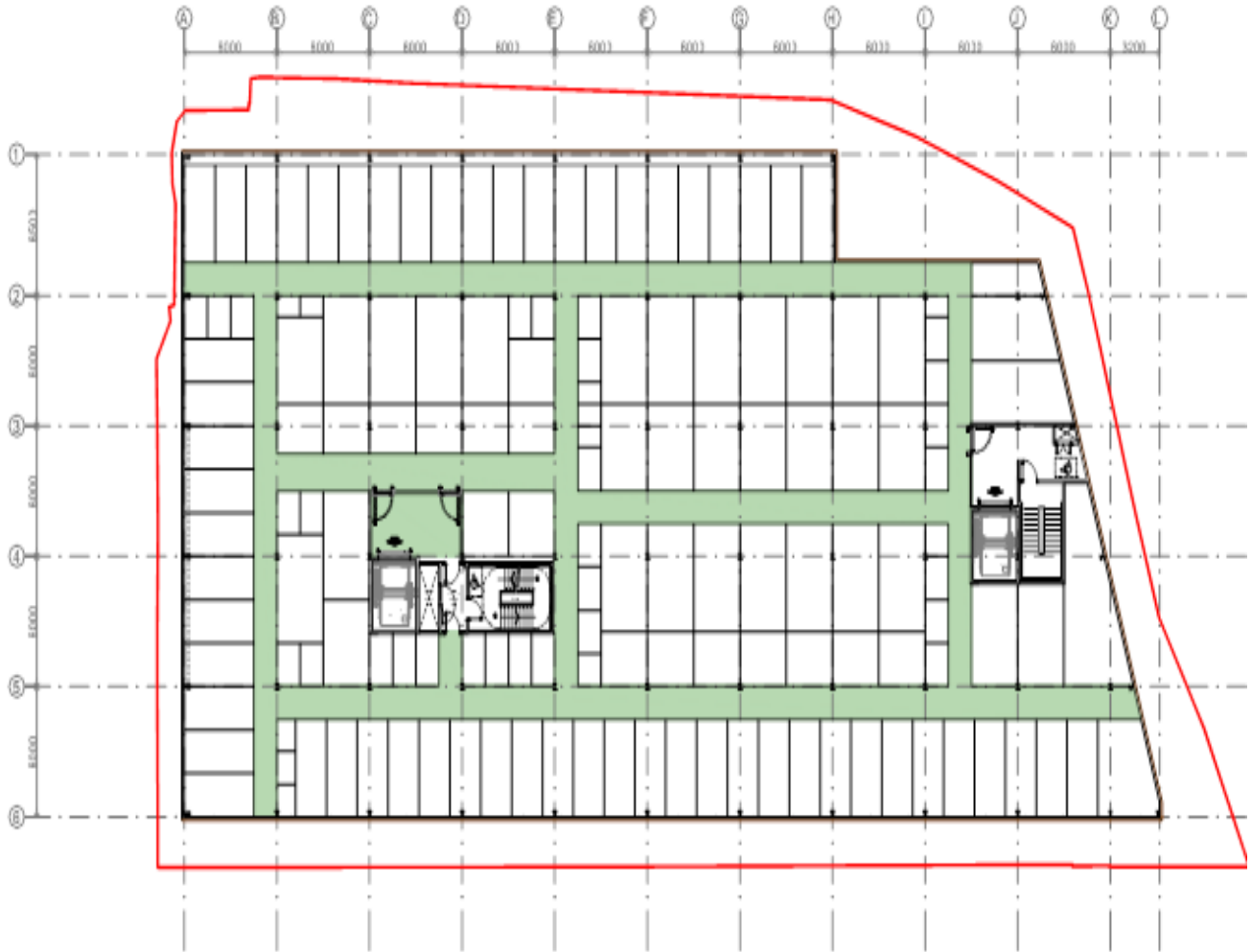
Proposed Ground Floor



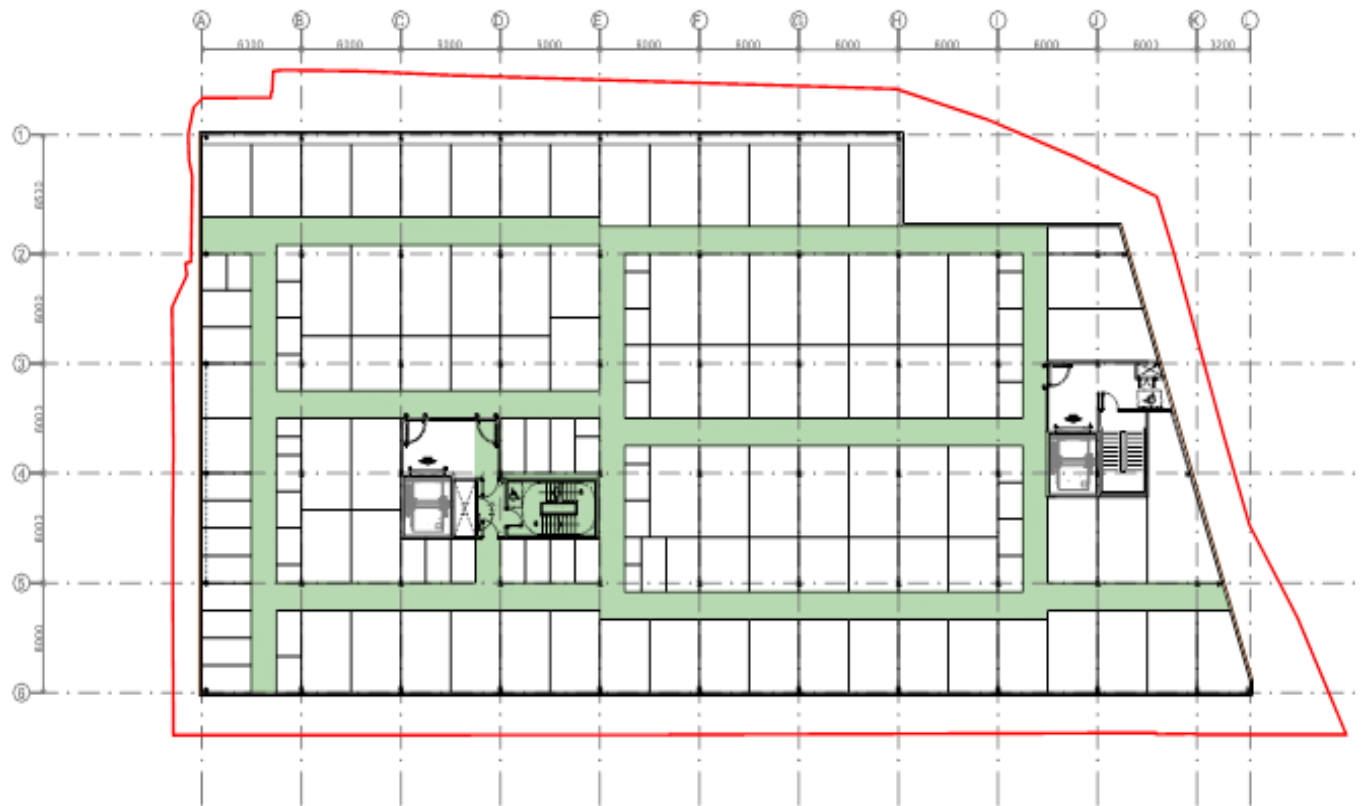
Proposed First floor Plan



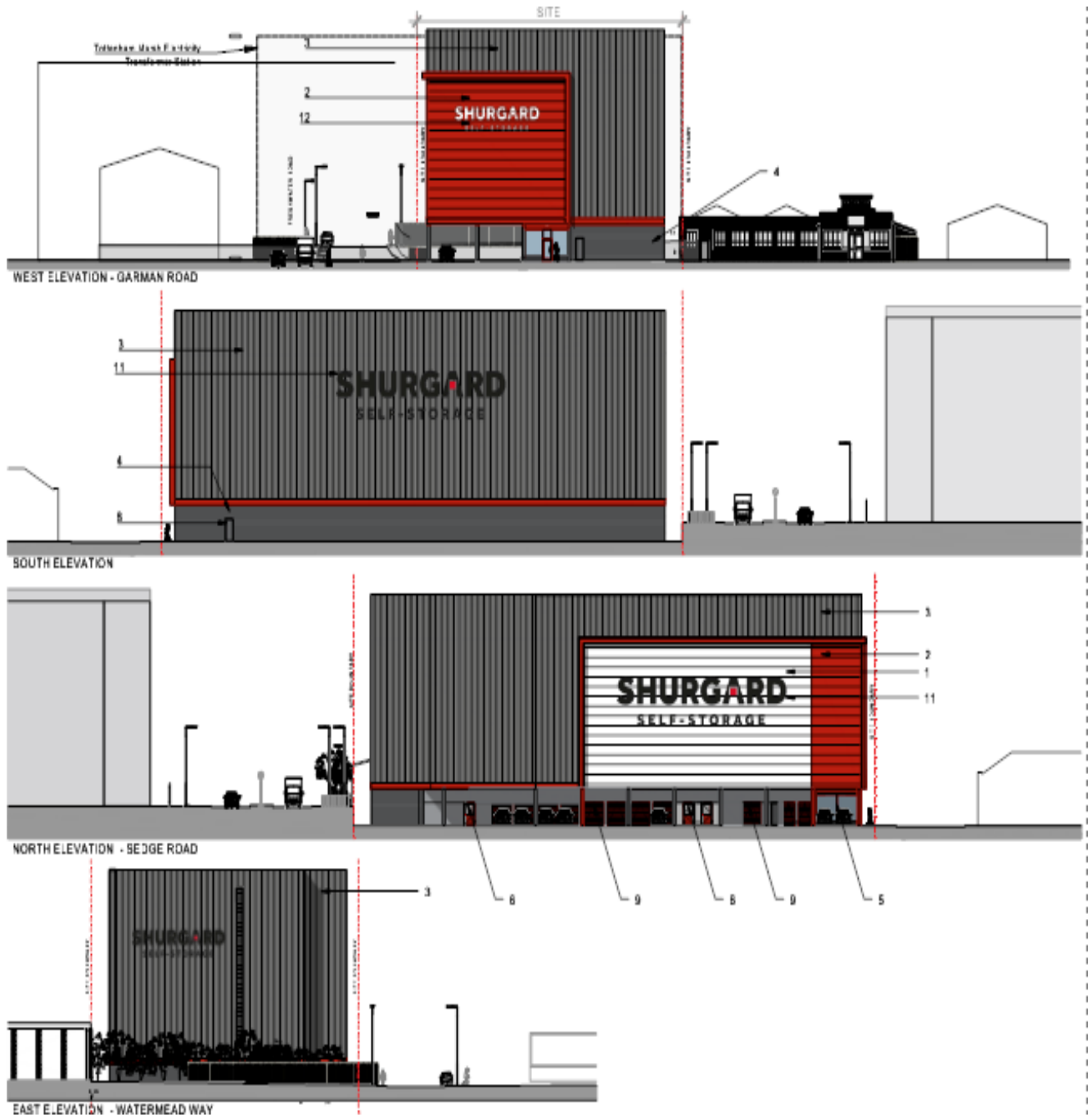
Proposed Second Floor Plan



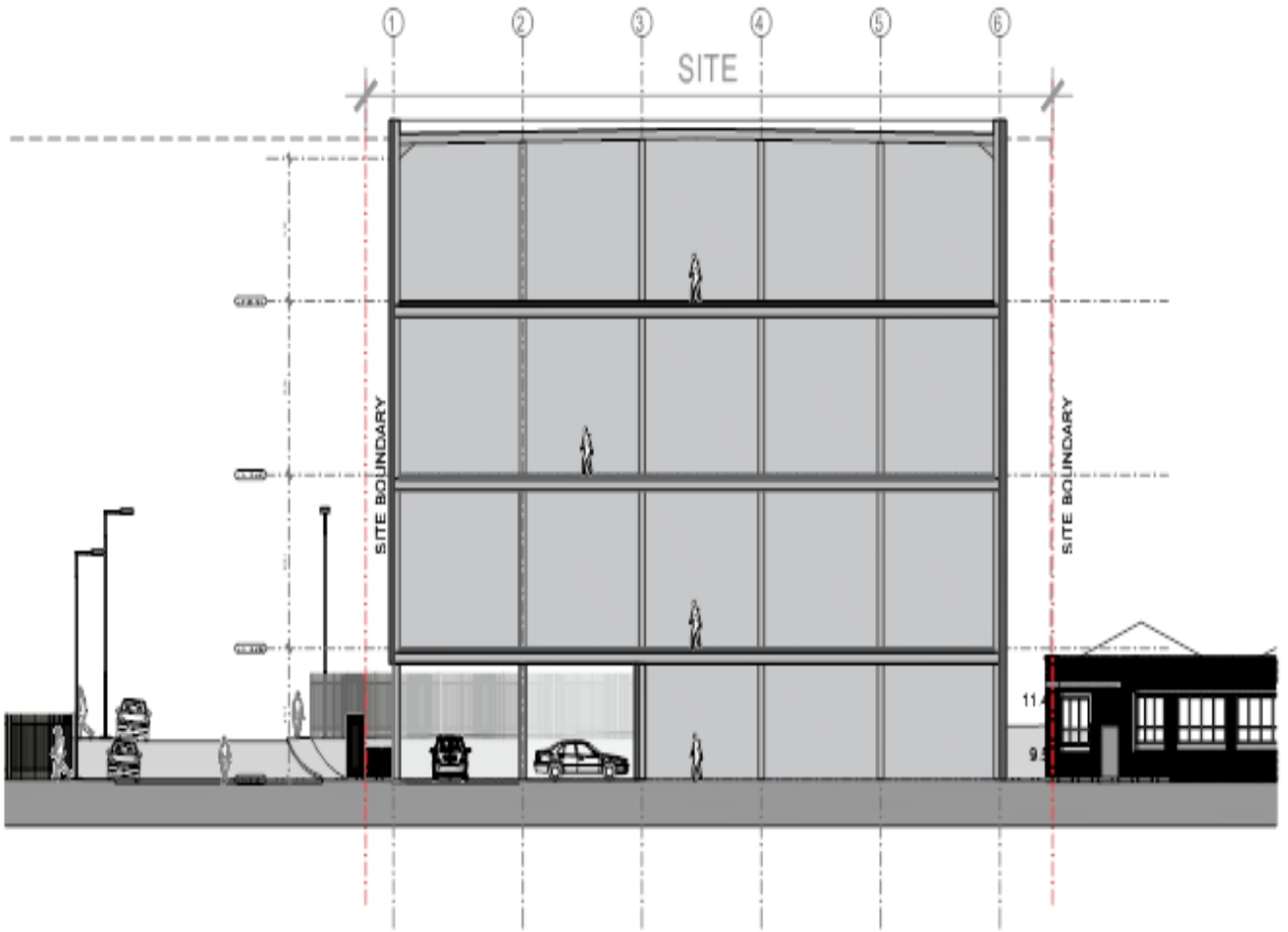
Third Floor Plan



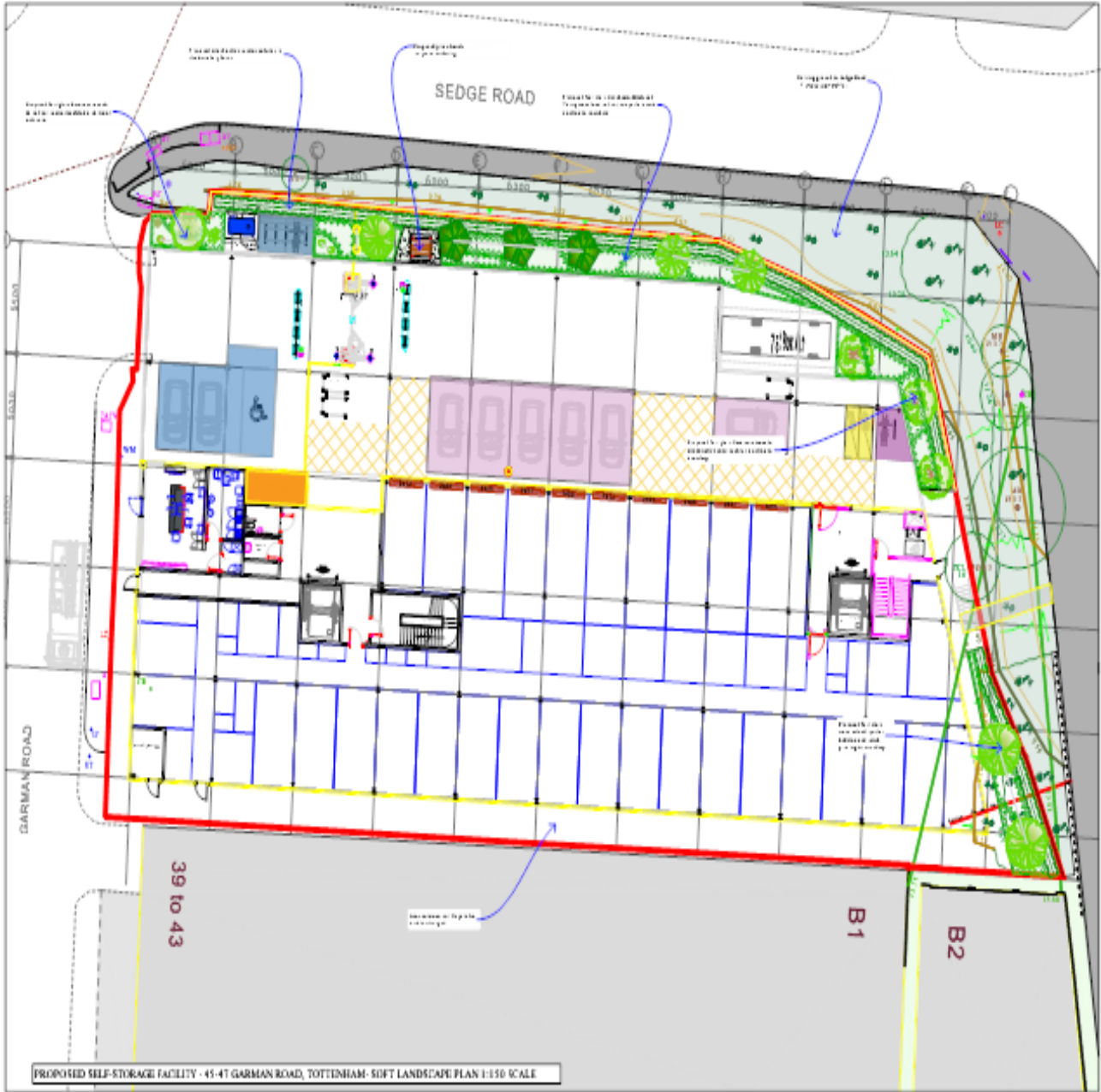
Proposed Elevations



Proposed Cross Section Plan



Landscape Proposals



View from Watermead Way (looking South) Proposal is pink



View from the Electricity Transformer station (looking W)



View from Garman Road (looking S)



View from Watermead Way (looking NW)



View from Railway Line (looking E)



Aerial view from Northumberland Park railway station (looking NE)

