REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2022/0664 **Ward:** Northumberland Park

Address: 175 Willoughby Lane N17

Proposal: Demolition of existing buildings on the site and redevelopment of the land to the west of Willoughby Lane / Dysons Road for the erection of modern employment premises to provide flexible employment space across use classes E (light industrial), B2 (General Industry), B8 (Storage and distribution) with ancillary offices), car parking, service yard areas, landscaping and associated works.

Applicant: Paloma Capital

Ownership: Private

Case Officer Contact: Sarah Madondo

Committee Site Visit Date: 03/02/2023

Date received: 24/02/2022

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 intensification of employment floorspace within a site designated as a Strategic Industrial Location.
- The proposed development would deliver almost double the quantum of floorspace, creating a total of 5592.5 sqm of flexible employment floorspace.
- 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 6th March 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) Future Den Connection
16) Be Seen
17) Overheating
18) BREEAM Certificate
19) Living Roofs
20) Urban Greening Factor
21) External lighting
22) Boundary Treatment
23) Noise
24) Servicing and delivery plan
25) GLA whole life carbon assessment

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 to be provided prior to above ground floor construction and Sustainability Review is to be provided on first occupation of the development.

    b. Estimated carbon offset contribution (and associated obligations) of plus a 10% management fee to be recalculated using Part L2013 software, based on £2,850 per tonne of carbon emissions if it does not meet the zero carbon target.

2) Green Lease
    a. For the developer to enter into a green lease with future occupiers that requires the future occupiers to engage with Energetik on a future DEN connection.

3) 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 £3,000 per annum for five years towards monitoring of the travel plan.

4) 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 £ £60,542.72 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.

5) Pedestrian crossing facilities at the Dysons Road/Leeside Road/Willoughby Lane

   a. Provision of financial contribution of £120,000

6) Highways

   a. Feasibility and design of the Brantwood Road Highways Works £50,000

7) Urban Greening Factor

   a. Provision of financial contribution of £9000 towards the installation of street trees.

8) Section 106 Monitoring contribution £9103.027

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.*

4. *The proposed development, in the absence of a S.278 agreement securing Brantwood Road Highways Works, would have an unacceptable impact on the highway network. 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.*

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.

CONTENTS

APPENDICES:

3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1 Proposed development

3.1.1. This is an application for the demolition of existing buildings on the site and redevelopment of the land to the west of Willoughby Lane / Dysons Road for the erection of modern employment premises to provide flexible employment space across use classes E(g) (Commercial, Business and Service), B2 (general industrial) and B8 (storage and distribution) (with ancillary offices), car parking, service yard areas, landscaping and associated works.

3.1.2. The development proposals seek to make most efficient use of the site by redeveloping it to provide seven employment units up to a maximum height of 12m, to be laid out as two terraces, one to the south and one to the north, with smaller units located to the north, set back from the residential properties on Middleham Road.

Image 1 - Corner of Dysons Road and Middleham Road

3.2 Site and Surroundings

3.2.1 The site is in north-east of the Borough and borders the boundary with LB Enfield to the north. It is at the end of Willoughby Lane, to the north of the road junction with Brantwood Road. The existing site is just under 0.94 hectres in floor area, is flat and roughly rectangular in shape, is approximately 2.5km north of Tottenham Hale and approximately 3 km south of Edmonton. The use of the existing site was an open storage and has a number of buildings on it, including Ashburton House which is used for Class E (Commercial, Business and Service) and Class B8 (Storage and distribution) purposes. The ste has been been vacant since the beginning of this year. The site is located in the Brantwood Strategic Industrial Location that is part of the wider Central Leeside employment area. It is therefore within an established employment area and is adjacent to other employment uses across the industrial, waste and, storage and

distribution sectors. Access to the site is via Dysons Road that forms the eastern boundary of the site, with Brantwood Road to the south.

3.2.2 To the west are industrial premises within the Brantwood Road Estate. The site forms eastern most plot of that Estate. The properties immediately to the north of the site (within LB Enfield) are two storey terraced dwelling houses and beyond that to the north east is the site of the Meridian Water regereration area.

Image 2 - Site location Plan

Image 3 - Aerial view of the site

3.2.4 The site is surrounded by roads on two of its sides: Dysons Road to the East and Brantwood Road to the south. The site is bounded by the Redcorn waste disposal

operation to the west and other commercial and industrial units to the south on the other side of Brantwood Road. The area to the north of the site along Dysons Road and Middleham Road is residential in nature, primarily comprising 2 storey houses. A public right of way runs east to west along the north of the plot between the commercial plots and the houses of Middleham Road.

3.2.5 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 area and is within an Archaeological Priority Area.

3.3 Relevant Planning History

3.3.2 HGY/2017/2072 - Minor material amendment following a grant of permission HGY/2005/0918 to alter the wording of Condition 4 to allow scaled back working (no mechanical or industrial processes) on Saturday and Sunday. Planning permission granted on 28/6/2017.

3.3.3 HGY/2017/1315 - Prior notification for demolition of Classes B8 and B1 use building. Planning permission granted 5/4/2017.

3.3.4 HGY/2017/0921 - Prior notification for demolition of Classes B8 and B1 use building. Planning permission granted 20/3/2017.

3.3.5 HGY/2005/0918 **-** Demolition of part of factory premises and chimneys and merger of premises with adjoining auto salvage recycling and de-polluting station and widening of access onto Willoughby Lane on southeast corner of site. Planning permission granted 28/03/2008.

3.3.6 HGY/2005/0918 - Demolition of part of factory premises and chimneys and merger of premises with adjoining auto salvage recycling and de-polluting station and widening of access onto Willoughby Lane on southeast corner of site. Planning permission granted 28/03/2008.

3.4 Relevant Enforcement History

3.4.1 COU/2019/00598 Change of use to car sales at the front - **No Breach Case Closed 06.12.2019.**

3.4.2 CON/2010/00669 Breach of condition 9 attached to HGY/2005/0918 - **No Breach Case Closed 26.11.2011**

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.

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.

9) LBH Lighting: No objection.

External:

10) Greater London Authority: No objection subjection condition.

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

12) London Fire Brigade: No comments.

13) Environment Agency: No comments.

14) Designing Out Crime Office: No objection subject to condition & informative

15) LB Enfield: No objection.

16) Transport for London: No objection subject to conditions

5. LOCAL REPRESENTATIONS

5.1 The following were consulted:

98 Neighbouring properties

1 site notice was 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: 16

5.1.2 Cllr Bevan: submitted the following comments:

- Requires that proposal is fully compliant with London Plan.
- Improve design and attractiveness.
- Traffic congestion in the area.
- Mowlem Estate on Leeside Road N17 0QJ, which was recently built to a very high standard in many aspects. This development should achieve the same standard.
- Substantial s106 contribution.

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

Design

- Scale/bulk of the building

Impact on neighbours

- Loss of sunlight to the garden
- Noise pollution
- Loss of sunlight into house
- Overshadowing
- Visual amenity

Parking, Transport and Highways

- Traffic congestion and obstruction
- Road safety

Environment and public health

- Health benefit/health concerns
- Noise and disturbance

Others

- Property devaluation *(officer comment - this is not a material planning consideration).*
- Mental health and wellbeing will be affected
- Benefits to the local residents
- How does the development fit with pandemic/covid lockdown measures

6 MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of the development

2. Design and appearance
3. Parking and highway safety
4. Energy and Climate Change
5. Urban Greening Factor
6. Flood risk and drainage
7. Air quality
8. Land contamination
9. Impact on the amenity of adjoining occupiers
10. Waste and recycling
11. Employment
12. Fire Safety

6.2 Principle of the development

6.2.1 The site is designated as Brantwood Road Strategic Industrial Location (SIL) (DEA1) 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.

6.2.6 Policy NT2 of the TAAP states that the Council will support development proposals within Northeast Tottenham SIL areas which:

- Increase job density and helps to meet Haringey's employment needs;
- Enables small firms to start-up and grow within flexible industrial space; and
- Improves the interface between industrial areas and the Lee Valley Regional Park.

6.2.7 Policy DM37 Part A of the Development Management DPD states that, within SIL areas, proposals for the intensification, renewal and modernisation of employment land and floorspace will be supported where the development proposal:

- Is consistent with the range of uses identified in Policy SP8 of the Local Plan (these include waste/recycling, transport, logistics and distribution amongst others);
- Allows for future flexibility for a range of business types and sizes;
- Provides adequate space for on-site servicing and vehicle waiting/movements;
- Enhances the quality of the local environment and business area; and

Demonstrably improves the functionality of the site for employment proposes including improvements in the: quality/type of employment space, quality/density of jobs on-site ad the site's contribution to the Council's wider employment objectives.

6.2.8 The application site is within the Central Leaside Business Area, which is part of a Strategic Industrial Location (SIL), located within the North East Tottenham area identified within the Tottenham AAP. The proposed net increase in internal floorspace would be approx. 5592.5 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 or the Tottenham AAP. 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 aligns with Policy in this respect.

Loss of waste use

6.2.9 Policy SI9 of the London Plan states that existing waste sites should be safeguarded. Any loss of a waste site would only be acceptable where appropriate compensatory capacity is made that should at least meet or exceed the maximum achievable throughput of the site proposed to be lost. Furthermore, it states that waste plans should be adopted before applications consider the loss of waste sites. A waste site is defined as land with planning permission for a waste use or a permit for waste use from the Environment Agency.

6.2.10 The site is a safeguarded waste site in the Site Allocations DPD (2017) as "Brantwood House, 175 Willoughby Lane" as a metal recycling site (vehicle dismantler) with a maximum throughput capacity of 60,000 tonnes per annum. The DPD's Policy SA4 states that such waste sites will be safeguarded for waste until alternative provision has been made.

6.2.11 The adopted North London Waste Plan(NLWP, 2022) Policy 1 "Existing Waste Management Sites" states that all existing waste management sites listed in Schedule 1 are safeguarded for waste use, and applications for non-waste uses will only be permitted where certain requirements are met including compensatory capacity elsewhere. Schedule 1 "Existing Safeguarded Waste Sites" does not include the site, and it is thus no longer safeguarded in the most up-to-date development plan policy on waste safeguarding, and so Policy 1 of the NLWP does not apply.

6.2.12 The NLWP Policy 2 "Priority Areas for New Waste Management Facilities" sets out priority areas in Schedule 2 which are identified as suitable for built waste management facilities. The site falls within one of these priority areas "A19-HR – Brantwood Road" which covers the wider Brantwood Road industrial estate. The policy supports waste management facilities coming forward in these general priority areas but does not preclude other uses, such as that proposed, coming forward.

6.2.13 As such in policy terms there would be no loss of safeguarded waste capacity as a result of the proposal and it is acceptable in principle.

6.3 Design and appearance

6.3.1 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.

6.3.2 The application site is located in a visually prominent position and the proposal would replace the existing industrial units, the use of which is considered unsympathetic to the new emerging development of the area. Since submission, the development has been revised to address concerns raised by the design officer and residents on Middleham Road.

6.3.3 The buildings would have an industrial design and would be finished in contemporary materials. The scheme would be finished in dark grey 'sinusoidal' profiled cladding to the majority of the building exterior, with fully insulated half round light grey cladding laid horizontally. Curtain walling and entrance doors/window details would be incorporated.

Image 4 - Dyson Road illustrative elevation

6.3.4 The Council's design officer has reviewed the scheme and notes that use of bricks on the Dysons Road elevation allows the development to transition from the more residential areas along Dysons Road where brick is predominantly used, to the industrial development along Brantwood Road that incorporates a greater variety of materials, to address the relationship of the development with Dysons Road to the east/Brantwood Road to the south. The southern and eastern elevations of Units 1-3 and the eastern elevation of Unit 4-7 have been amended to incorporate additional brick features using new buff brick to provide more variety in the materials as well as greater relief and visual interest.

6.3.5 In additional, openings within the buildings have incorporated to provide more opportunities for passive surveillance and improve the relationship of the development with these public routes. The additional openings will also increase the amount of natural daylight entering units 1-3 and 7 to improve the working environment and reduce the requirement for artificial lighting.

6.3.6 The design officer notes that landscaping has been improved and the development includes the provision of an amenity space along the eastern boundary of the site with Dysons Road. This feature will provide employees and visitors of the site with a breakout space, which is important for the well-being of those working at the site. This addition will also help soften the interface between the development and Dysons Road.

6.3.7 With regard to the proposed design and appearance the design officer notes that design advice to incorporate more brick has been followed and the scheme has been amended.

6.3.8 The design officer notes that the roof profile has been amended to a mono-pitch approach to secure a reduced eaves height along the northern boundary adjacent to the neighbouring residential properties. This reduces the height of the building on the northern boundary by 1.5 metres and this reduces the clear internal height from 10m to 8.2m. This approach will still allow for the inclusion of first floor offices and the mezzanine floor above the loading doors that was seen as a good feature of the proposals at the pre-application stage. The design officer notes that that the proposed development will now be comparable with the massing of Brantwood House where it was once slightly higher, with the building stepped back from the northern boundary when compared to the existing context. The existing, lean-to structure that extends west past Brantwood House is lower in height but again is closer to the residential properties on Brantwood Road. The revised approach will secure the objective of intensifying use of the site, whilst responding to the surrounding context.

6.3.9 The design officer concludes that the proposals are acceptable in design terms for this location in terms bulk and mass. The redevelopment of this site marks a great improvement and would be similar to other industrial units within the same vicinity.

6.3.10 A condition will require approval of all external materials and restrict the addition of rainwater goods to the building elevations.

6.3.11 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.

6.3.12 Officers consider that the proposals are considered acceptable in design terms and this development, would be, functional, compatible with its location and of no harm to any more sensitive areas and respond successfully to the setting.

6.4 Parking and highway safety

6.4.1 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.

6.4.2 The site's PTAL score is 2, according to TfL's WebCAT. A recalculation of the PTAL was requested at pre-application stage (notably to take account of the new Meridian Water station). The transport consultant has recalculated it and confirmed that the PTAL remains unchanged. It is however estimated that the PTAL could increase to 3 (moderate connectivity) once Phase 1 of Meridian Water is delivered and the journey time to Meridian Water station on foot is shortened as a result.

6.4.3 In regards to parking and highway safety, the applicant has submitted a transport assessment, which has been assessed by transportation officers. The site will be accessed via priority junction from Dysons Road at the eastern site boundary.

Image 5 - Current access on Dysons Road

6.4.4 The transport statement states that, the existing access would be relocated approximately 15m to the north of its current position and will require some changes to existing on-street parking arrangements, for which a Traffic Regulation Order would be required. The highway works would be carried out under a S.278 highway agreement and an amendment to the Traffic Management Order to reflect changes to the on-street parking layout. This would be a requirement of the S.106 agreement.

6.4.5 The assessment has identified that the Dysons Road/Leeside Road/Willoughby Lane/Brantwood Road junction is currently difficult to cross for pedestrians due to the absence of formal crossing points. Although there are dropped kerbs and central refuge points on each approach to the roundabout, the pedestrian crossings are uncontrolled and informal. In addition, not all of them have tactile paving. The assessment has also highlighted issues with footway parking including HGV parking encroaching on footway widths. A financial contribution has been sought towards the feasibility and implementation of zebra crossings on each approach to the roundabout via S.106 agreement.

6.4.6 In addition to this a contribution towards the feasibility and design of the 'Brantwood Road cycle corridor' - that's identified within the Walking and Cycling Action Plan is sought via S.106 agreement to ensure that there is an improvement in cycling environment and infrastructure.

Image 6 - Proposed Access and Parking Plan

6.4.7 In terms of vehicle parking, the transport statement states that 44 parking spaces would be provided on site in accordance with Policies T5 and T6 as set out in the London Plan 2021. The transportation officer's that consider the number of parking spaces to be appropriate as the London Plan states that car parking for industrial sites varies considerable depending on location and the type of development proposed. A parking and design management plan would be secured via S.106 agreement and tied in with monitoring of the Travel Plan to ensure a decrease in demand over the monitoring period and to minimise the demand for on-street parking/onsite parking. It is proposed that 10% of the 44 car parking spaces would be fitted with electric vehicle charging points and 16% of the 44 parking spaces would be designated for disabled users. In addition, 5% of the commuter car parking spaces would be allocated to car shares, this would be monitored by the Travel Co-ordinator.

6.4.8 In regards to the operational parking, the ground-floor plan shows a total of seven bays (3 for HGVS and 4 for MGVs). The transport statement states that the site layout has been designed to accommodate 3 HGVs and 15 LGVs simultaneously, which would be sufficient to cater for the peak operational vehicle demand identified between 09:00 and 10:00 of 12 vehicles (2 HGVs and 10 LGVs). The applicant would be required to submit a detailed delivery and servicing plan, which indicates how all the LGVs would be accommodated outside the proposed marked bays. The transportation officer considers that a condition should be attached to address this.

6.4.9 The statement indicates that a minimum of 24 long-stay and 6 short-stay cycle parking spaces would be provided, which accords with the minimum standards. It is noted that at least 5% of the long-stay provision (rounded up to 2 spaces) would be for larger cycles. The transportation officer notes that the adequacy of the long-stay and short-stay cycle parking and access arrangements would be secured by planning condition.

6.4.10 In terms of refuse and recycling, the Transport Assessment indicates that refuse/ recycling storage would be located within the service yard and collection would be undertaken by a private company.

6.4.11 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 S.106 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.

6.4.12 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.

6.5 Energy and Climate Change

6.5.1 The NPPF requires development to contribute to the transition to a low carbon future and to reduce energy consumption.

6.5.2 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.

6.5.3 The development achieves a 100% reduction in on-site regulated carbon emissions compared to a Part L 2013 compliant baseline with SAP10 carbon factors. This is based on good fabric efficiencies, solar photovoltaic panels on the industrial units and air source heat pumps. A plan showing the location of where the pipework could be installed in the future to connect individual units to a future decentralised energy network has been submitted. A planning condition has been recommended to submit evidence of discussions with the network operator and the location of pipework that should be installed by the developer from the individual units to a single point of connection at the edge of the site, in line with Policy SI3, to enable a site-wide future connection to the DEN.

6.5.4 Dynamic thermal overheating modelling was undertaken to model the risk of overheating in the office areas, and reduce the overheating risk and cooling demand in line with the Cooling Hierarchy. The development passes the minimum overheating mitigation requirements.

6.5.5 A BREEAM Pre-Assessment report was submitted demonstrating that the units could achieve a “Very Good” score, in line with Policy SP4. A planning condition has been recommended to submit the certification, demonstrating that the sustainability measures have been delivered.

6.6 Urban Greening Factor

6.6.1 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.

6.6.2 Local Plan Policy SP11 promotes high quality landscaping on and off-site and Policy SP13 seeks to protect and improve open space and providing opportunities for biodiversity and nature conservation.

6.6.3 Policy DM1 of the DM DPD requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to respond to trees on or close to a site. Policy DM21 of the DM DPD expects proposals to maximise opportunities to enhance biodiversity on-site.

6.6.4 London Plan Policy G7 requires existing trees of value to be retained, and any removal to be compensated by adequate replacement. This policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals. Policy SP13 of the Local Plan recognises, “trees play a significant role in improving environmental conditions and people’s quality of life”, where the policy in general seeks the protection, management and maintenance of existing trees.

6.6.5 The proposed development would provide improvements to the soft landscaping over the existing arrangement which provides virtually no greening. The Urban Greening Factor for the development has been calculated as 0.06, which while low, is an improvement compared to the current situation of almost no greening. The site is designated as a Strategic Industrial Location (SIL) and the aim of the proposal is to secure the intensification of employment capacity at the site, as required by Haringey and GLA planning policy, therefore limiting the opportunities available to incorporate soft landscaping. The development is for flexible employment use including B2 and B8, so as noted above the urban greening factor requirement of 0.3 does not apply.

6.6.6 Soft landscaping is provided as part of the development proposals on the site and through the associated highways works to contribute to the visual amenity of the area for the benefit of users of the development and the surrounding roads and areas of public realm. The landscaped areas provide a softer boundary to the development and provide greater opportunities for biodiversity compared to the existing site. Officers consider that the proposal does include good urban greening improvements which provide an acceptable balance between greening and intensification of B2 and B8 uses, as such this is considered acceptable in urban greening terms.

<u>Trees/hedges</u>

6.6.7 The boundary planting is formed by hedges, a mix of broad-leafed Privet and Hornbeam, with infill areas of mostly evergreen planting adjacent to the maintenance paths that run around the new units. Birch and Cherry trees are also proposed at the main site entrance off Dysons Road to create a sense of arrival at the development. In addition, six street trees would be planted near the site and this would be secured via S.106 agreement.

6.6.8 The landscape proposals have been designed to include species that are robust to cope both with the situation of full sunshine, as well as shade to ensure their long-term durability. All plant beds have good access for maintenance from the paths that surround the units. An amenity area has also been incorporated within the landscaped area, including seating for the use of employees at the site, which is located on the western boundary of the development.

6.6.9 It is therefore considered that the proposal is compliant with planning policy in respect of soft landscape provision. The final details will be secured by a condition.

Ecology/ Biodiversity

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

6.6.11 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.

6.6.12 The proposed soft landscape area surrounding the proposed development have been designed to maximise the biodiversity of the area by using a mixture of hedging plants.

6.6.13 The existing site has a negligible amount of soft landscaping and is currently characterised by obtrusive fencing around its perimeter, which detracts from the visual amenity of the area and has a negative impact on the environmental quality of this location. The proposals will introduce more greenery and planting and secure a biodiversity net gain in respect of both habitat and hedgerow units.

6.6.14 The proposal will create a significant increase in ecological value in relation to broad habitats and increase in ecological value in relation to hedgerow habitats, in accordance with the Biodiversity Net Gain requirement in accordance with the above policies.

6.7 Flood Risk and Drainage

6.7.1 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.

6.7.2 The site is located with Flood Risk Zone 2 (low) as defined by the Environment Agency. As the proposal is for Commercial industrial use, the development will be classified as a ‘less vulnerable’ development by the Flood Risk Vulnerability Classification (Table 2) in

the National Planning Policy Framework (NPPF). The applicant has submitted a Flood Risk Assessment and drainage strategy.

6.7.3 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."*

6.7.4 The applicant has submitted a Flood Risk Assessment and Drainage Strategy report. These have been reviewed by the LBH Flood & Water Management officer who has confirmed that they are satisfied that the impacts of surface water drainage will be addressed adequately.

6.7.5 As the proposals are considered least vulnerable in relation to flood risk 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.

6.7.6 In terms of sustainable drainage, surface water run-off will be through soakaways, discharge into a watercourse at an appropriate rate and discharge into a surface water sewer at an agreed rate. A condition to secure a drainage system and its details is recommended.

6.7.7 Thames Water raises no objection with regards to water network and water treatment infrastructure. Thames Water recommends a condition regarding piling and an informative regarding groundwater discharge and water pressure.

6.7.8 Accordingly, the proposed development is considered to comply with local drainage policies.

6.8 Air Quality

6.8.1 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.

6.8.2 The applicant has submitted an Air Quality Assessment. The report sets out, that due to proximity of nearby receptors the site is considered to have a medium risk of impacts with regards to dust soiling and PM10 concentrations. However, following the implementation of appropriate mitigation measures impacts associated with the construction of the development are likely to be insignificant. The report further states a number of mitigation measures would be undertaken during demolition, construction and operation phase to prevent air quality impacts. These measures will ensure that the development will be air quality neutral.

6.8.3 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

6.8.4 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**.**

6.8.5 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.

6.9 Impact on the amenity of adjoining occupiers

6.9.1 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. London Plan Policy D14 requires development proposals to reduce, manage and mitigate noise impacts.

6.9.2 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.

Daylight and sunlight impact on surrounding properties

6.9.3 The applicant commissioned Anstey Horne to undertake a daylight and sunlight assessment of the effect of the proposed development upon the existing surrounding properties. The following properties were assessed ,1a,3,5,7,9,11,13,15,17,19,21,23,25,27,31,33, Middleham Road,1,2,3,4,Malham Terrace and 179 Willoughby Lane. In terms of daylight, all windows and rooms in 13 Middleham Road, properties from 17 to 33 Middleham Road, the Malham Terrace properties and 179 Willoughby Lane all achieve or exceed the guideline values, either by experiencing minimal change or no impact from the proposed development to their daylight levels.

6.9.4 The report states that for sunlight to all the properties with south facing windows were tested and rooms in number 3 and 4 Malham Terrace, the Middleham Road properties and 179 Willoughby Lane meet or exceed the guideline values, either experiencing minimal change or no impact from the proposed development to their sunlight levels.

6.9.5 Furthermore, the daylight and sunlight report states that in terms of sunlight availability, all of the windows and rooms assessed nos. 1,1a, 3, 5, 7,9,11 and 15 Middleham Road, achieve the guideline values on both an annual and winter basis. Including the following, properties number 1 and 2 Malham Terrace all adhere to the BRE 2011 guidelines. BRE

guidelines have been recently updated but not in relation to the impact on neighbouring properties.

6.9.6 The report further indicates that in terms of daylight availability, a Vertical Sky Component test was conducted, which measures the amount of skylight available at the centre of a window on the external plane of the window wall. The results shows that of the six windows tested on number 1,1a Middleham Road, three exceed the guideline values for Vertical Sky Component (VSC), with the remaining three receiving a reduction that is marginally outside the 0.8 guideline the BRE sets out, but overall this is considered acceptable. In terms of daylight distribution results demonstrate that of the four rooms tested, two rooms achieve the guidelines values with minimal or no change experienced. In regards to sunlight availability, all of the windows and rooms assessed achieve the guideline values on both an annual and winter basis.

Sunlight to surrounding gardens and open spaces

6.9.7 The report states that, the sunlight to surrounding gardens and open space was calculated in accordance to BRE guide and the results reveal that the gardens at 17, 19, 21, 23, 25, 27, 29, 31 and 33 Middleham Road and 2, 3 and 4 Malham Terrace adhere to the guidelines with minimal or no impact. For the gardens that remain, 1, 3, 5, 7, 11, 13 and 15 Middleham Road and 1 Malham Terrace receive reductions beyond the guideline values set out in the BRE. Six gardens receive reductions below 0.66 times their former value, two receive reductions below 0.5 times their former value and one garden receives a reduction of 0.00 times its former value. Whilst the report highlights that some gardens receive a reduction beyond the guideline values, the results are not unusual in the context of the urban location. The BRE guide explains that the numerical guidelines should be interpreted flexibly, since natural lighting is only one of many factors in site layout design. It is considered that the development achieves an appropriate balance between daylight and sunlight related impacts and other material planning considerations.

6.9.8 Furthermore, given that, there is an existing high brick wall and accompanying buildings at the southern end of the Malham Terrace and Middleham Road properties, which limits the sunlight received by the gardens. As part of the proposals, the development is stepping away slightly from the boundary with these properties.

6.9.9 Officers considered that the adjoining properties bounding the site will not be unduly affected by the proposed development in this regard, particularly when weighed against the other proposed public benefits of the proposal. As such, the proposal is not considered to have a significant, detrimental impact on the amenity of the existing properties in accordance with the above policies.

Privacy/Overlooking and outlook

6.9.10 Since submission, the development has been amended to address some of the concerns raised by the design officer and local residents. The height of the building adjacent to the northern boundary of the site has been lowered to reduce the massing of the development and improve the relationship with the nearby residential properties. To reduce the height, the roof profile has been amended from a standard roof design with a ridge, to a mono-pitch approach to secure a reduced eaves height along the northern boundary.

6.9.11 Furthermore, the site would be bounded by 2.4-metre-high fence, which would provide some screening and the materials of the fence would be conditioned. As stated above the roof form has been amended, such that the new development is only marginally above this 25-degree line of sight. The site is in an urban location and designated as SIL and it is considered that the revised proposals are appropriate and will not have an undue impact on the relationship with the adjoining residential properties whilst enabling an intensification of the site.

Other amenity considerations

6.9.12 Policy DM23 of the DM DPD states that new developments should not have a detrimental impact on air quality, noise or light pollution.

6.9.13 The submitted Air Assessment (AQA), which demonstrates that mitigation measures would be put in place to ensure the development, is air quality neutral.

6.9.14 Furthermore, the applicant has submitted a environmental noise report, which assessed the following activities:

- Fixed mechanical plant
- External activity
- Noise break-out from units

6.9.15 The report concluded that predicted noise levels from external activity are within the WHO Guideline for external areas and also no greater than the existing daytime ambient noise levels (LAeq1hr) measured between 0700 and 2300 hours. It is therefore concluded that the impact of noise from external activity during the day (0700 - 2300 hours) will be acceptable.

6.9.16 In terms of noise break-out from units, the reports states that the layout of the site and units have been designed taking into account good acoustic design principles with all doors and windows facing towards the centre of the site away from the residential properties. Whilst the exact use of the units is not yet known, the applicant has been advised that they are likely to be E, B2 or B8 uses, and therefore will not generate high levels of internal noise. The noise levels generated will be significantly lower than the levels generated by the existing use of the site as a car breaker.

6.9.17 In regards to noise from mechanical service plants, the report states that (type and precise detail of the mechanical service plant is not yet known). However, the fixed plant is likely to consist of air handling units, extract fans, boilers and emergency generators. Given that precise details of the mechanical service plant are not known, it is considered that noise levels can be controlled by a suitably worded planning condition.

6.9.18 Any dust and noise relating to demolition and construction works would be temporary impacts that are typically controlled by non-planning legislation. This will mitigate the concerns of existing residents when it comes to noise and dust pollution during the construction phases. Nevertheless, the demolition and construction methodology for the development would be controlled by condition.

6.9.19 The increase in noise from occupants of the proposed development would not be significant to neighbouring occupants given that the current existing is waste recycling/car breakers and the current urbanised nature of the surroundings.

6.9.20 Therefore, it is considered that the proposal would not have a material impact on the amenity of residents and occupiers of neighbouring and surrounding properties.

6.10 Waste and Recycling

6.10.1 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.

6.10.2 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 will be attached.

6.11 Employment

6.11.1 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.

6.11.2 The applicant has indicated that the development would provide over 5,500sqm of employment floor space for flexible E, B2 and B8 use. The site will include seven individual units each of which will have ancillary office space. The proposals will take into account varying levels and types of disability and including visual impairment.

6.11.3 Provisions for local employment skills and training will be secured by S.106 obligations.

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 raise no objection.

6.13 Conclusion

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

- The proposed development would deliver almost double the quantum of floorspace, creating a total of 5592.5 sqm of flexible employment floorspace.

- 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 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 £360.995, 87 (5,592.5 sqm 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 – Planning Conditions 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:
   31380 PL 200 – Site Location Plan ,31380 PL 201E – Site Layout Plan ,31380 PL 202A – Ground Floor Plan,31380 PL 203A – Office Floor Plans,31380 PL 204A – Proposed Elevations,31380 PL 205A – Proposed Elevations,31380 PL 207 – Existing and Proposed Layout overlay,31380 PL 208A – Proposed Unit Section 31380 PL 209 – Existing Elevations Sheet 1,31380 PL 210 – Existing Elevations Sheet 2,31380 PL 211 – Illustrative Sections Showing Existing Buildings,31380 PL 212 – Dysons Road Illustrative Elevation,92550-HLS-00-ZZ-M2-G-10100-A7 Existing Site Layout/Topographical Survey Sheet 1,837.19.02 Rev B – Planting Layout, Active Travel Zone Assessment – DTA, June 2022,Archaeology Assessment – RPS, 2021
   Air Quality Assessment (including dust and emission assessment) – Kairus, November 2021,Air Quality Technical Note v1 – Kairus, June 2022,Applicant Response to GLA Stage 2 Memo, 15th Novembe,Asbestos Survey Report – Life Environment Services, November 2020,Be Seen Spreadsheet v2 – ESC, November 2022,Biodiversity Net Gain Metric Results – July 2022,BREEAM Calculator – December 2022,Car Park Management Plan – DTA, June 2022,Carbon Emission Reporting Spreadsheet – ESC, October 2022,Circular Economy Memo – ESC, December 2022,Circular Economy Statement v4 – ESC, December 2022,Circular Economy Template – ESC, December 2022 Community Infrastructure Levy Forms – February 2022,Construction Logistics Plan – DTA, February 2022,Construction Management Plan Version 1 – February 2022,Delivery Service Plan – DTA, 2022,Design and Access Statement (incl. Crime Prevention Statement) – MSA, 2021,Dysons Road Halligans Response to GLA Issues – Halligans, 23.05.22,Ecology/Biodiversity Audit – Betts, April 2021,Energy Calculations – ESC, November 2022,Energy Memo Spreadsheet – ESC, October 2022,Energy Statement Rev C – Halligans, October 2022,External Lighting Proposals – Halligans, July 2021,External Lighting Overspill Drawing B3526/EXT/100 – Halligans, July 2021,Flood Risk Assessment & Drainage Strategy Rev D – PRP, September 2022,Fire Statement – Marshall Fire, February 2022,31380 Edmonton GLA Response – MSA, June 2022,Land Contamination Report/Geo-Environmental Assessment – Delta Simons, June 2020,Noise Assessment – Sharps Redmore, June 2021,Overheating Assessment Rev A – Halligans, January 2023,Planning Statement (incl. Statement of Community Involvement) – MSA, February 2022,Planning and Design & Access Statement Addendum – October 2022,Soil condition Report – GB Card & Partners, December 2016,Summary Response to Council Carbon Management Comments Rev A – MSA January 2023

   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 plant 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.

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

   b. Evidence that all plant and machinery to be used during the demolition and construction phases of the development shall meets Stage IIIB of EU Directive 97/68/ EC for both NOx and PM emissions shall be submitted to the Local Planning Authority.

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

   c. During the course of the demolitions, site preparation and construction phases, an inventory and emissions records for all Non-Road Mobile Machinery (NRMM) shall be kept on site. The inventory shall demonstrate that all NRMM is regularly serviced and detail proof of emission limits for all equipment. All documentation shall be made available for inspection by Local Authority officers at all times until the completion of the development.

   Reasons: To protect local air quality and comply with Policy 7.14 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.

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 endure 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. The development hereby approved shall be constructed in accordance with the Energy Report rev C (dated October 2022) delivering a minimum 100% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, air source heat pumps (ASHPs) and a minimum XXX kWp solar photovoltaic (PV) array.

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

- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;
- Evidence of discussions with the decentralised energy network operator on the viability of the development connecting;
- A revised heating strategy following discussions with Energetik;
- Confirmation of the necessary fabric efficiencies to achieve a minimum 15% reduction with SAP2012 carbon factors;
- Location, specification and efficiency of any ASHPs, if they form part of the revised heating strategy, (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 the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); and how the energy will be used on-site before exporting to the grid;
- Specification of any additional equipment installed to reduce carbon emissions;
- 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 arrays shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.

(b) The solar PV arrays air source heat pumps must be installed and brought into use prior to first occupation of the relevant unit. Six months following the first occupation of that unit, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array and heat pump have been installed.

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

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

Urban Green Factor

15. 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.

Breeam

16. (a) Prior to the above ground commencement, 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.
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) Prior to occupation of the relevant unit, 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.

Circular Economy

17. Prior to the occupation [of any phase / building/ development], a Post-Construction Monitoring Report should be completed in line with the GLA's Circular Economy Statement Guidance.

The relevant Circular Economy Statement shall be submitted to the GLA at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to the occupation [of any phase / building/ development.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with London Plan (2021) Policies D3, SI2 and SI7, and Local Plan (2017) Policies SP4, SP6, and DM21.

Whole Life-Cycle Carbon

18. Prior to the occupation of each building, the post-construction tab of the GLA's Whole Life Carbon Assessment template should be completed in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall

be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the relevant building.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.

External Lighting

19. 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

20. 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

21. 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.

25. Prior to the occupation of each building the post-construction tab of the GLA's whole life carbon assessment template should be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage, including the whole life carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the relevant building.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings.

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

INFORMATIVE : CIL

Based on the information given on the plans, the Mayoral CIL charge will be £360,995.87 (5592.5sqm 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: Advertisement

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

INFORMATIVE: Secure by Design

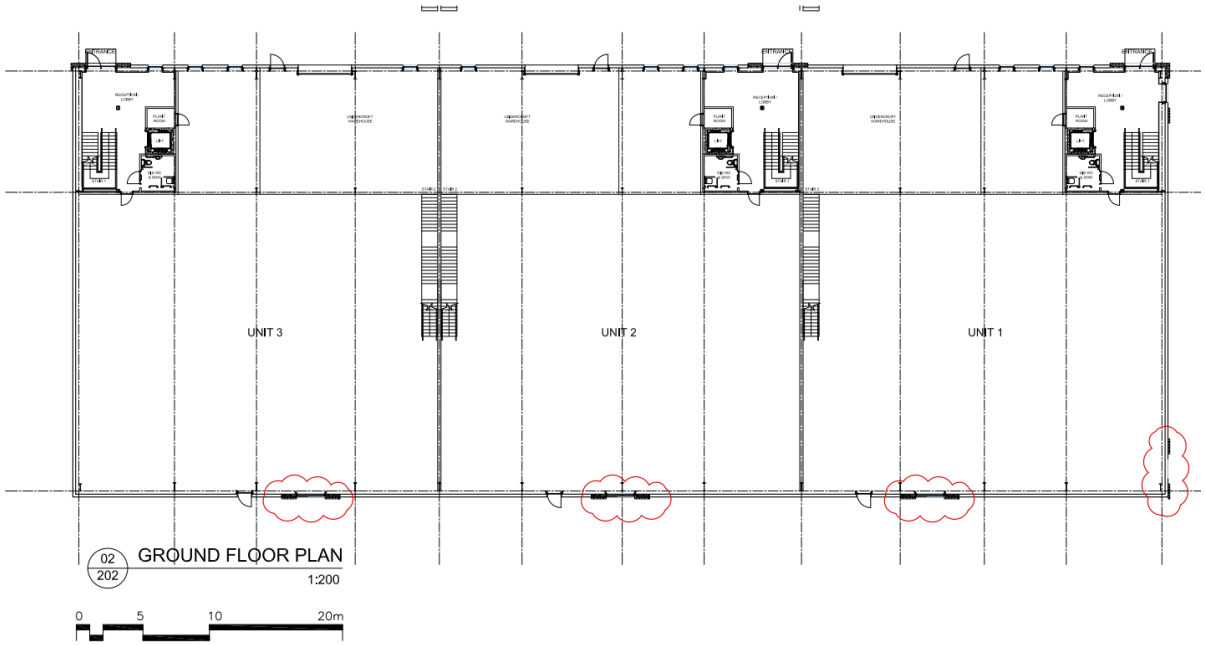
The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free ofcharge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.

INFORMATIVE: Historic London

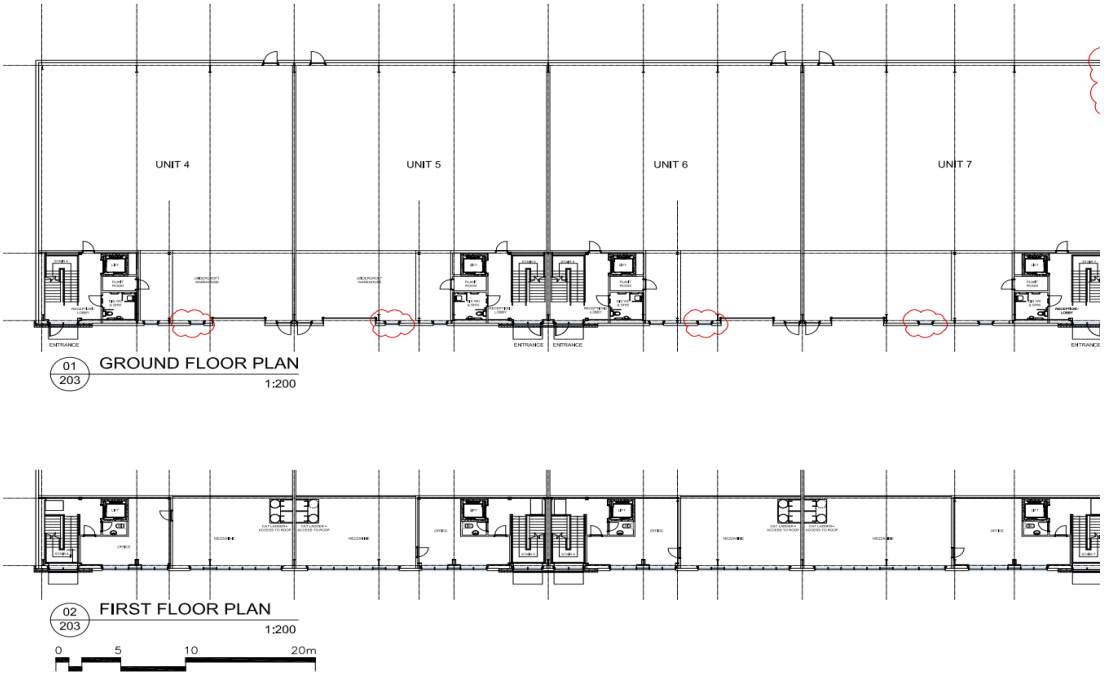
A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
B. Where appropriate, details of a programme for delivering related positive public benefits. Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Appendix 2- Plans and images

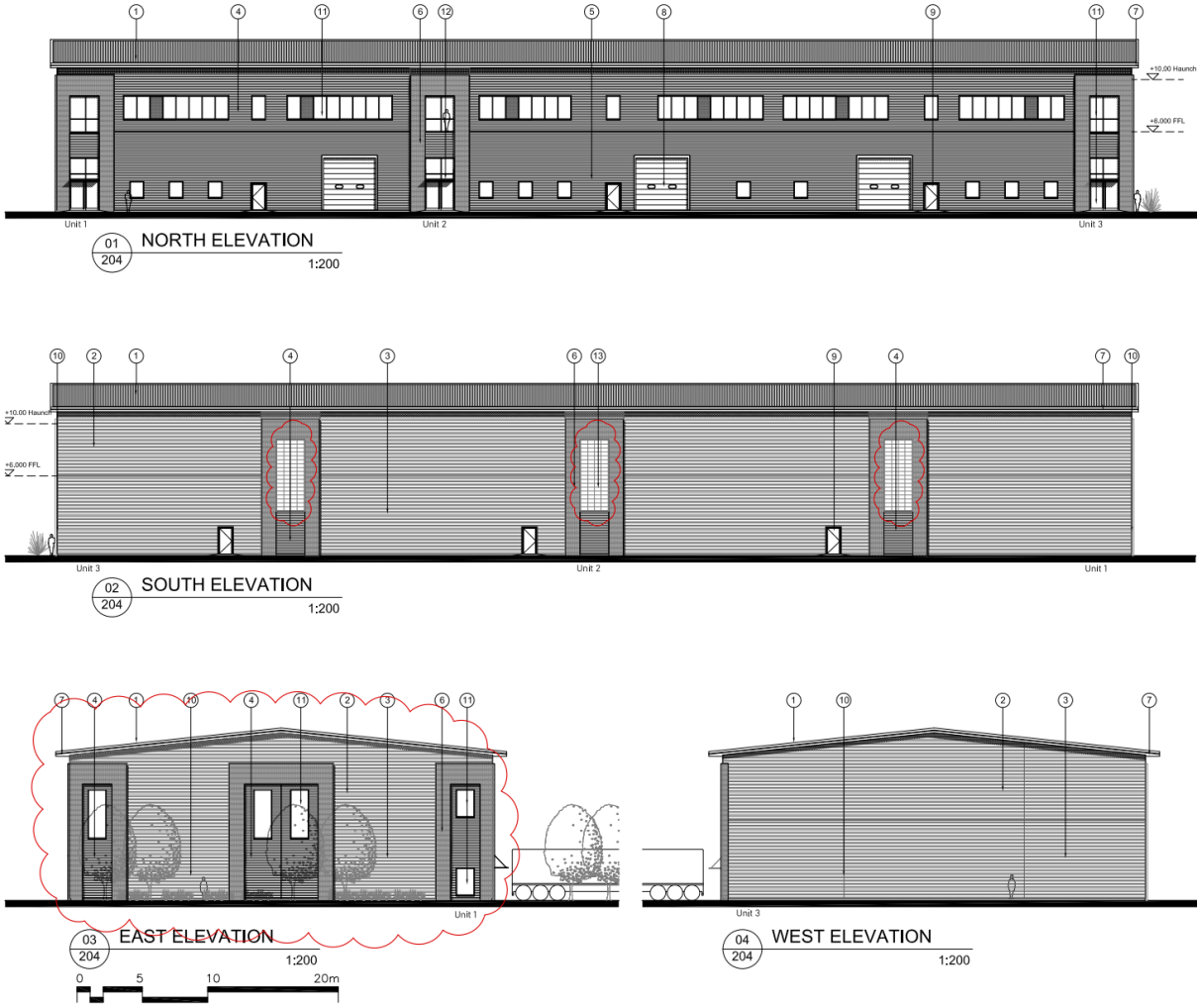
Site location plan



Proposed ground floor plan

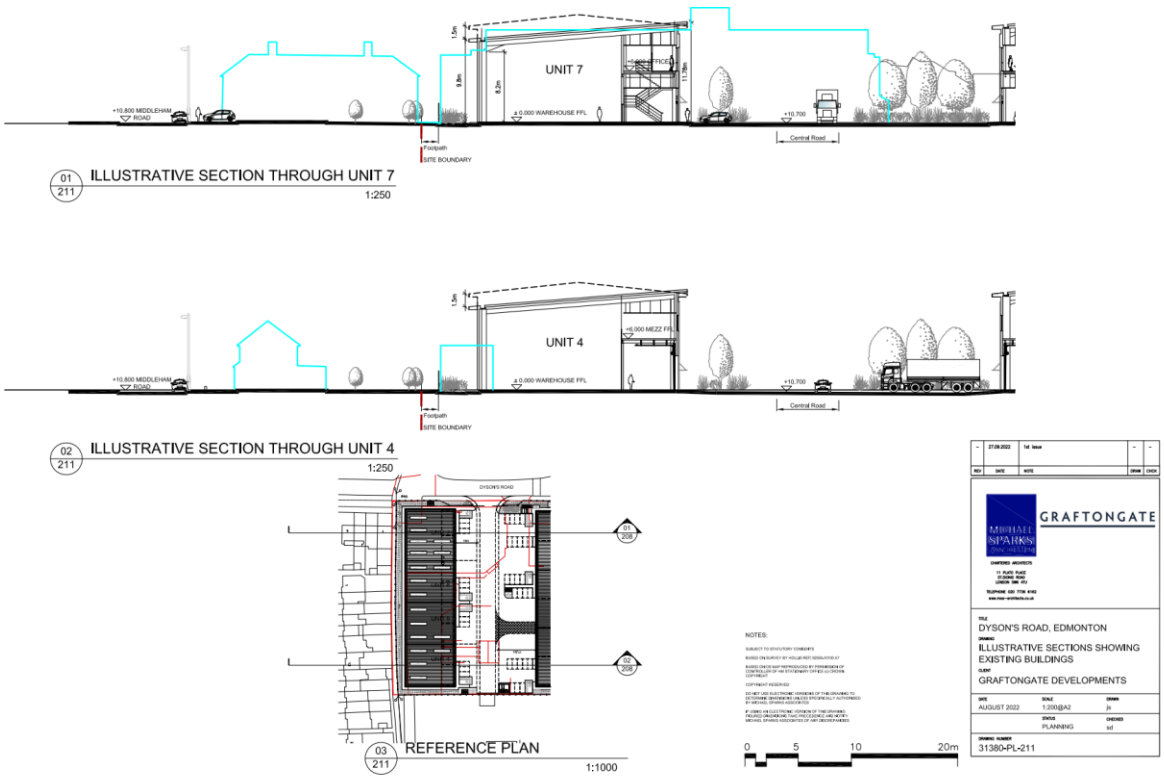


Proposed first plan



Elevations Unit 1-3

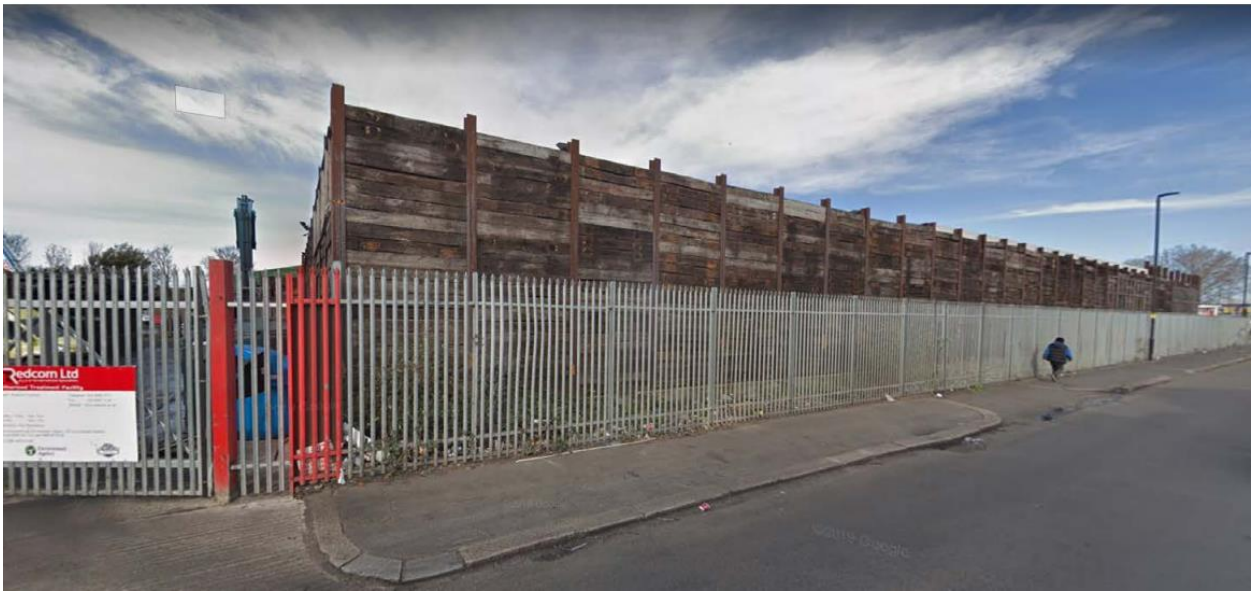
Proposed Illustrative elevations



Existing building illustrative sections

Photographs of around the site


Quality Part X
WILLOUGHBY LANE


Redcom Ltd


MIDDLEHAM ROAD
19

Appendix 3 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Design Officer	**Site Context** These proposals are for what at first glance would be a very standard, typical "business park" industrial development. It is to be hoped that the industrial space development industry will increasingly move away from this vehicle-orientated, pedestrian-unfriendly, land-hungry form of development, but the applicants have made it clear that the market they know well is still very much wedded to the need to have large, flexible volumes within a secure perimeter with good vehicular servicing from articulated heavy goods vehicles. However, this is a more intensive such proposed development, with larger volumed buildings, and fewer parking spaces, than typical, representing a 50% increase on floorspace, considerably more increased volume given the high ceiling heights of minimum 8m, generally over 10m, compared to the existing, and allowing potentially significant mezzanine floorspace to be inserted. It therefore represents progress towards a greater intensity of use of employment land. In extensive discussions with officers, the applicants have been challenged to significantly improve the fenestration, appearance and landscaping, especially to improve their appearance from the street and for the pedestrian and neighbour's experience. Therefore, brick elements have been added to the standard profiled metal facades, around unit entrances, to key corners and along the otherwise blank long building frontage to the south along Brantwood Road, with a significant number of additional high level windows added to these brick elements. The roof profile of the northern block was also amended following discussions, to a mono pitch with a lower eaves to the north, to reduce the proposal's impact on the residential properties to the north, albeit that they are generally well spaced away from this site, with not only long back gardens but also a well wooded screen formed by a separate narrow lane between this site and those residential properties. To the Dysons Road frontage, where the neighbouring houses are closer, albeit oriented perpendicular to the application site, the proposals as amended are actually lower than the existing industrial building on the site at the frontage. Key external materials, building details, boundary treatment and landscaping should be secured by condition. The applicants' proposed brick is a plain buff, which would be contrary to officers' recommendations in meetings for a more red coloured brick with a fair amount of variation, and it is to be hoped such a brick can	Support noted.

Stakeholder	Question/Comment	Response
	be substituted at this condition stage. It is also noted that the applicants' plans and elevations are inconsistent and illogical in places on the extent and disposition of the brick elements; these should be of similar size, appearance and fenestration on both sides of their key corners, to the north-east, south-east and south western corners of the development, so they do not appear as a skin-deep "wallpaper" but have a solidity and substance, and benefit forgotten sides including to the front gardens of the residential properties to the north, where the contribution of the brick elements to the proposal's transition to the residential neighbourhood to the north is so important. It is also vital that the site fencing and landscaping to both of the street frontages is both durable and attractive when confirmed at condition stage. With these issues resolved at condition, the proposals should form an acceptable design to an unremarkable, typical industrial area.	
Transportation	I have reviewed the above application, the transport consultant's response to my initial queries and taken account of the pre-application advice issued in 2020 (PRE/2020/0178). My final comments are set out below, alongside a set of recommended planning conditions and s.106 obligations. **Transport Assessment** <u>Development Proposals</u> The proposals involve the demolition of existing buildings and the erection of 5,592sqm (GIA) of employment floor space for flexible E (light industrial), B2 and B8 uses. The site would include seven individual units, each of which would have ancillary office space. On-site commuter and operational parking provision is also proposed on site. <u>Public Transport Assessment Level (PTAL)</u> The site's PTAL score is 2, according to TfL's WebCAT. A recalculation of the PTAL was requested at pre-application stage (notably to take account of the new Meridian Water station). The transport consultant has recalculated it and confirmed that the PTAL remains unchanged with a value of 2. It is however estimated that the PTAL could achieve 3 (moderate connectivity) once Phase 1 of Meridian Water is delivered and the	Noted conditions to be attached

Stakeholder	Question/Comment	Response
	journey time to Meridian Water station on foot is shortened as a result. <u>Personal Injury Collison (PIC) Data Analysis</u> Five years' worth of PIC data have been analysed and the conclusion drawn by the transport consultant is that there do not exist any current road safety issues related to the highway geometry and layout. As such, the Transport Assessment concludes that no intervention is needed as part of the development proposals. <u>Active Travel Zone (ATZ) Assessment</u> An ATZ assessment has been carried out. This was provided post submission during June 2022. A visit of the surroundings of the site was undertaken on Thursday 8th June 2022. Four routes from the site were assessed: • Route 1: Leeside Road Bus Stop (Stop NH) via Dysons Road and Willoughby Lane; • Route 2: Meridian Water Underground Station via Leeside Road and Meridian Water Development; • Route 3: Brantwood Road Bus Stop (Stop V) via Brantwood Road; and • Route 4: White Hart Lane Overground Station via A1010 High Road and Moselle Street. In summary, the assessment has identified that the Dysons Road/Leeside Road/Willoughby Lane/Brantwood Road junction is currently difficult to cross for pedestrians due to the absence of formal crossing points. Although there are dropped kerbs and central refuge points on each approach to the roundabout, the pedestrian crossings are uncontrolled and informal. In addition, not all of them have tactile paving. The assessment has also highlighted issues with footway parking including HGV parking encroaching on footway widths. We have sought financial contributions towards the feasibility and implementation of zebra crossings on each approach to the roundabout. The TA has detailed that there will be an approximate tripling of trips to the site compared to present with over 600 trips being made predominantly by foot to access the site within a typical 12 hour period. This number will likely increase as travel plan measures affect mode shares over time increasing active and sustainable trips. The applicant has now proposed making a £120,000 financial contribution towards the implementation of improved pedestrian crossing facilities at the Dysons Road/Leeside Road/Willoughby Lane/Brantwood Road junction, and this is welcomed.	

<table>
<tr><th>Stakeholder</th><th>Question/Comment</th><th>Response</th></tr>
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In addition to this a £50,000 contribution towards feasibility and design of the Brantwood Road protected cycle track facility is sought to ensure that there is an improvement in cycling environment and infrastructure and it is understood the applicant is amenable to this contribution too.

<u>Existing Travel Patterns</u>

The existing travel patterns have been derived from 2011 Census workplace modal split data. The existing modal split suggested by the transport consultant is derived from Middle-Layer Super Output Area (MSOA) Haringey 002. This has been compared with the modal split associated with Workplace Zone E33029853 taken from 2011 Census table WP7103EW - Workplace and usual residence by method of travel to work (2001 specification) (Workplace population). This workplace zone is illustrated below and is smaller than MSOA Haringey 002.

Both modal splits are comparable, therefore the existing modal split in the Transport Assessment is considered acceptable.

Modal Split Comparison
<table>
<tr><th></th><th>Haringey 002</th><th>Workplace Zone E33029853</th></tr>
<tr><td>Underground, metro, light rail or tram</td><td>7.1%</td><td>9%</td></tr>
<tr><td>Train</td><td>3.6%</td><td>6%</td></tr>
<tr><td>Bus, minibus or coach</td><td>23.6%</td><td>18%</td></tr>
<tr><td>Taxi</td><td>0.3%</td><td>0%</td></tr>
<tr><td>Motorcycle, scooter or moped</td><td>0.0%</td><td>1%</td></tr>
<tr><td>Driving a car or van</td><td>55.1%</td><td>53%</td></tr>
<tr><td>Passenger in a car or van</td><td>3.0%</td><td>4%</td></tr>
<tr><td>Bicycle</td><td>1.6%</td><td>3%</td></tr>
</table>
</td><td></td></tr>
</table>

Stakeholder	Question/Comment			Response
	On foot	5.8%	6%	

Workplace Zone E33029853

Proposed Vehicle Access

A new vehicle access is proposed, involving the relocation of the current access point some 15m north of its existing position. This would involve highway works to be carried out under a s.278 highway agreement and an amendment to the Traffic Management Order to reflect changes to the on-street parking layout. A Stage 1 Road Safety Audit (RSA) has been undertaken independently. The recommendations raised by the RSA and designer's response have been reviewed. All recommendations are to be addressed as part of the S.278

Stakeholder	Question/Comment	Response
	works, namely the provision of an adequate pedestrian crossing point across the new crossover and for the footway to be made good and continuous along the site on Dysons Road. A Stage 2 RSA would be secured by planning condition. Visibility splays have been prepared, based on the 85th percentile observed speeds derived from the ATC surveys, comprised between 17 and 20mph. The minimum requirements for the visibility splays at the proposed access point are met. The applicant has suggested that site access management be covered by a pre-occupation requirement involving the preparation of a Site Access Management Strategy. It is considered that this could be set out both in the Detailed Delivery and Servicing Plan to be secured by planning condition and the Car Parking Management Plan to be secured by s.106 planning obligation. The gated access to the site would be open between the hours of 07:00 and 19:00, and closed at night, thereby considerably minimising the chance of vehicles waiting on the public highway before entering the site. <u>Proposed Pedestrian and Cycle Access</u> The applicant has outlined the reasons for providing a single point of access for both vehicles, pedestrians and cyclists, including for site security and to retain landscaped areas on site. The proposed site access would provide footpaths on either side; this is considered sufficient considering the low levels of forecast baseline and future-year pedestrian and cycle traffic into and out of the site. As part of the s.278 highway works, we would expect tactile paving to be provided at both ends of the new access point. <u>Proposed Delivery and Servicing Arrangements</u> Swept paths have been provided showing how a 16.5m articulated lorry and an 8m box van would access and egress the site, as well as manoeuvre in and out of on-site loading bays. A dedicated turning area is shown for HGVs wanting to exit the site. <u>Proposed Vehicle Parking</u> The transport consultant is following the approach set out in the London Plan (Paragraph 10.6.18) to calculate the appropriate amount of car parking to be provided on site: *“For industrial sites, the role of parking – both for workers and operational vehicles – varies considerably*	

Stakeholder	Question/Comment	Response
	depending on location and the type of development proposed. Provision should therefore be determined on a case-by-case basis, with the starting point for commuter parking being the standards in Table 10.4 with differences in employment densities taken into account. Flexibility may then be applied in light of site-specific circumstances as above. Operational parking should be considered and justified separately." *Commuter Parking* The Employment Density Guide (2015) by the Homes and Communities Agency indicates that the B1c employee density is 1 per 47sqm NIA. B2 and B8 have different densities, and it is noted that B2 uses have a greater employee density at 1 per 36sqm GIA. If we use the B1c employee density as a guide, apply it to the 5,369sqm NIA, then it is predicted that there would be 114 employees. Applying a car mode share of 53% gives a total of 60 spaces. If we used the B2 employee density as a guide, then there would be up to 155 employees, and the resulting parking demand up to 82 spaces. With B8 uses, employee densities vary between 1 per 95sqm GEA and 1 per 70sqm GEA, the number of employees would range between 62 and 84, and the parking demand between 33 and 45 spaces. Depending on the mix of industrial uses on site, the parking demand would therefore vary between 33 and 82 spaces. The transport consultant justifies a provision of 44 spaces. The TRICS parking accumulation indicates that the maximum on-site commuter parking demand would be 62, this is confirmed by using the B1c employee density and a 53% car mode share as derived from 2011 Census data, as outlined above. With a 38% car mode share applied, this requirement would be lowered to 44 spaces. Whilst it is agreed that the car mode share in this workplace zone encompassing the site may have decreased over the last decade since the 2011 Census, a decrease of 15 percent points is not substantiated. The 38% mode share is presented in the Framework Travel Plan as a target at the Year Five horizon and therefore should be avoided to calculate the parking requirement from the outset. However, it is welcome to have an ambitious target for the Travel Plan. It is noted this satisfies a requirement of London Plan (2021) Policy T6.2 Office Parking to achieve a reduction in car parking provision over time and its conversion to other uses, via Travel Plan mechanisms. Owing to on-site spatial constraints, the on-site car park occupancy of 44 spaces is accepted but is unlikely to be achieved until the implementation of Travel Plan measures is well underway. It is most certainly possible that on-street parking would be required to accommodate the surplus of parking demand in the first few years of operation of the proposed development, i.e. approximately 18 spaces. A parking stress survey was undertaken on two days in May 2022 between 07:00 and 19:00 within 300m walking distance of the site. The survey results show there is ample spare capacity in local streets, therefore any surplus parking demand generated by the proposed development could be easily located on street.	

Stakeholder	Question/Comment	Response
	In either case, the calculated requirement of 44 spaces is much higher than the maximum provision allowed for by the London Plan (2021) maximum standards: Lee Valley Opportunity Area of up to 1 space per 600sqm GIA, with up to 9 spaces on site, but it does reflect the need to determine an adequate provision on a case-by-case basis. It is suggested that 44 spaces would accord with the London Plan standards (1 space per 125sqm), this is incorrect as the right standard to use is 1 space per 600sqm GIA in this case. On balance, it is important not to underprovide parking on site therefore the suggested 44 spaces are considered appropriate, in line with the level of flexibility sought as allowed by the London Plan. We would however require that a Parking and Design Management Plan be secured by s.106 agreement and tied with the monitoring of the Travel Plan, to ensure the decrease in demand over the monitoring period and minimise the demand for on-street parking and on site. *Operational Parking* Paragraph 10.6.18 of the London Plan (2021) states that *"Operational parking should be considered and justified separately."* The ground-floor plan shows a total of 7 bays (3 for HGVS and 4 for MGVs). The transport consultant says that the site layout has been designed to accommodate 3 HGVs and 15 LGVs simultaneously, which would be sufficient to cater for the peak operational vehicle demand identified between 09:00 and 10:00 of 12 vehicles (2 HGVs and 10 LGVs). However, it is not clear from the site layout in Appendix B of the addendum document how all LGVs would be accommodated outside the proposed marked bays. Suitable locations would need to be illustrated clearly in the Detailed Delivery and Servicing Plan (to be conditioned) to highlight how this would work within the site from a management perspective as there are no further marked bays. <u>Car Parking Management Plan</u> A Car Parking Management Plan has been prepared. It is intended for a detailed version of the document to be also secured by s.106 planning obligation. It is proposed that 10% of the 44 car parking spaces be fitted with electric vehicle charging points. There are no specific standards for electric vehicle infrastructure for commuter parking for the proposed land uses. It is noted that, in accordance with Policy T6.2 Office Parking of the London Plan, *"all operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles"*. Therefore, we would expect all	

Stakeholder	Question/Comment	Response
	operational parking spaces/loading bays to have such equipment. Additionally, 5% of the commuter car parking spaces would be allocated to car sharers, with regular monitoring of their use by the Travel Plan Co-ordinator and in conjunction with Travel Plan surveys. The intention would be to review demand and deliver additional spaces for car sharers as and when required by converting regular commuter spaces on site. In excess of the London Plan (2021) minimum accessible parking provision requirements (up to 10%), 16% of the 44 spaces would be designated for disabled users, which is welcome. Their use would also be monitored through the Travel Plan and, should there not be demand for all disabled users' spaces, the Parking Design and Management Plan should highlight a mechanism for the conversion of some of them into regular spaces to increase on-site parking capacity and further limit the impact upon local on-street provision. <u>Proposed Cycle Parking</u> The proposed cycle parking numbers have been calculated on the basis of a GEA of 5,996sqm on the basis of the B1 Light Industrial standards, the most onerous requirements amongst the proposed land uses. It is proposed to provide a minimum of 24 long-stay and 6 short-stay cycle parking spaces, which accords with the minimum standards. It is noted that at least 5% of the long-stay provision (rounded up to 2 spaces) would be for larger cycles. Full adherence to the London Cycling Design Standards (LCDS) is expected, including the following principles: • Long-stay parking: secure (with access for employees only), lockable and covered/sheltered; and • Short-stay (visitor) parking: secure, conveniently located close to the entrances and overlooked. It is advised that all short-stay cycle parking should be provided in the form of Sheffield stands. All minimum dimensional and spacing requirements should comply with the LCDS. Cycle access should avoid any stairs, narrow doorways or gates of less than 1.2m in width. The adequacy of the long-stay and short-stay cycle parking and access arrangements would be secured by planning condition. This would involve the provision of full details showing the parking systems to be used, access to them, the layout and space around the cycle parking spaces with all dimensions marked up on plans.	

Stakeholder	Question/Comment	Response
	Trip Generation *Existing / Extant Use Traffic Generation* The existing vehicle trip generation in Table 9 is obtained by multiplying existing person trips by the car mode share, 53%, which is accepted. At the Council's request, calculations based on the modal split derived from the 2011 Census method-of-travel-to-work data have been extended to obtain the existing multi-modal trip generation disaggregated per mode for all other modes (in addition to vehicles). The existing operational vehicle trip generation has also been derived separately from TRICS and added to the existing (commuter) multi-modal trip generation. *Proposed Development Traffic Generation* The TRICS selection is accepted. In line with the existing trip generation, a baseline car mode share of 53% has also been used for the proposed trip generation. The 38% car mode share is only aspirational and a target set to be met by Year Five in the Framework Travel Plan. The proposed operational vehicle trip generation has also been derived separately from TRICS and added to the proposed (commuter) multi-modal trip generation. *Net Trip Generation Assessment and Impact* The net multi-modal trip generation has been derived from proposed and existing multi-modal trips. It is forecast that the development proposals would generate an additional 38 two-way and 5 two-way person trips in the AM and PM peak hours respectively. Operational (delivery and servicing) movements would see an increase of 34 two-way and 9 two-way movements in the AM and PM peak hours respectively. The biggest increase would come from commuter and operational vehicles, however the impact on the local highway network would be minimal. Likewise, the net impact on all different modes of transport would not be material. **Framework Travel Plan**	

Stakeholder	Question/Comment	Response
	The Framework Travel Plan is acceptable. In order to discourage private car use for commuting, future versions of the Travel Plan would need to set out the mechanism to monitor on-site car park usage, with the aim of gradually decommissioning spaces to accompany the reduction in the car mode share over time. This would be linked to a Parking Design and Management Plan to be secured by s.106 planning obligation. **Outline Delivery and Servicing Plan** The Outline Delivery and Servicing Plan is acceptable. As stated above, the transport consultant says that the site layout has been designed to accommodate 3 HGVs and 15 LGVs simultaneously, which should be sufficient to cater for the predicted peak demand (established to be 12 vehicles – 2 HGVs and 10 LGVs). The site layout does not clearly show where all 12 operational vehicles could park on site, as there is a limited number of operational parking bays. A Detailed Delivery and Servicing Plan would be required by planning condition and need to illustrate how the peak demand for operational parking would be fully contained on site and managed. It is understood that refuse and recycling storage would be located within the service yard. Collection would be undertaken by a private company and should be carried out within the site to minimise the impact on the public highway. **Outline Construction Logistics Plan** It is disappointing that not even an indicative demolition and construction programme has been provided. A Detailed Construction Logistics Plan would be conditioned. A highway condition surveys planning condition (pre- and post-works surveys including of footways and carriageways along the site) is recommended. **Framework Construction Environmental Management Plan** No comment. A Detailed Demolition and Construction Environmental Management Plan would be secured by planning condition. **Recommended Planning Conditions**	

Stakeholder	Question/Comment	Response
	• Cycle Parking Details – to meet TfL's London Cycle Design Standards • Detailed Delivery and Servicing Plan • Detailed Construction Logistics Plan • Highway Condition Surveys • Detailed Demolition and Construction Environmental Management Plan • Detailed design for new Highway Access including stage 1 and Stage 2 Road Safety Audits **Recommended S.106 Heads of Terms** • Travel Plan and contribution of £3,000 per year for 5 years • Parking Design and Management Plan • S.278 Agreement for Highway Works • £120,000 contribution towards improvement of pedestrian crossing facilities at the Dysons Road/Leeside Road/Willoughby Lane/Brantwood Road junction • £50,000 contribution towards feasibility and design of the Brantwood Road protected cycle track facility **Summary** This application is for the demolition of the existing buildings at 175 Willoughby Lane and the erection of 5,592sqm (GIA) of employment floor space for flexible E (light industrial), B2 and B8 uses. The site would include seven individual units, each of which would have ancillary office space. There will be associated car and cycle parking and the relocation of the existing highways access to suit the new arrangements.	

Stakeholder	Question/Comment	Response
	Transportation have considered the proposals and note the associated transportation demands and impacts that will arise. There will be uplifts in movements by all modes to and from the site, highways changes, and the applicant has included a Travel Plan, Delivery and Servicing Plan and an outline Construction Logistics Plan in their submission to demonstrate how the transport aspects and impacts will be managed. Overall, the application is considered acceptable, subject to the planning conditions and S106 obligations detailed above this response summary.	
Carbon Management	**Carbon Management Response 01/08/2022** In preparing this consultation response, we have reviewed: • Energy Report prepared by Halligan Consulting Engineers (dated September 2021; Rev A) ○ Including a BREEAM New Construction 2018 Pre-Assessment Report prepared by ESC Environmental Difference (dated May 2021) • Overheating Assessment prepared by Halligan Consulting Engineers (dated July 2021) • Relevant supporting documents. **1. Summary** The development achieves a reduction of 101% carbon dioxide emissions on site, which is supported. No carbon offsetting contribution will be due as the development is considered zero carbon in planning policy terms. Further work is required under the Overheating Strategy. The Circular Economy Statement and Whole	No objection subject to conditions and obligations

<table>
<tr><th>Stakeholder</th><th>Question/Comment</th><th>Response</th></tr>
<tr><td></td><td>
Life Carbon Assessment have not been submitted. Appropriate planning conditions will be recommended once this information has been provided.

2. Energy – Overall
Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013)). The London Plan (2021) further confirms this in Policy SI2.

The overall predicted reduction in CO_2 emissions for the development shows an improvement of approximately 101% in carbon emissions with SAP10 carbon factors, from the Baseline development model (which is Part L 2013 compliant). This represents an annual saving of approximately 119 tonnes of CO_2 from a baseline of 118 tCO_2/year.

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 221 tCO_2.

<table>
<tr><td colspan="4">Non-residential (SAP10 emission factors)</td></tr>
<tr><td></td><td>Total regulated emissions (Tonnes CO_2 / year)</td><td>CO_2 savings (Tonnes CO_2 / year)</td><td>Percentage savings (%)</td></tr>
<tr><td>Part L 2013 baseline</td><td>118</td><td></td><td></td></tr>
<tr><td>Be Lean</td><td>70</td><td>47</td><td>40%</td></tr>
<tr><td>Be Clean</td><td>70</td><td>0</td><td>0%</td></tr>
<tr><td>Be Green</td><td>-1</td><td>71</td><td>61%</td></tr>
<tr><td>Cumulative savings</td><td></td><td>119</td><td>101%</td></tr>
<tr><td>Carbon shortfall to offset (tCO_2)</td><td>No offset due</td><td></td><td></td></tr>
</table>

Energy – Lean
The applicant has proposed a saving of 61 tCO_2 in carbon emissions (37%) through improved energy efficiency standards in key elements of the build, based on SAP2012 carbon factors. This goes beyond the minimum 15% reduction respectively set in London Plan Policy SI2, so this is supported. However, it is noted that the ASHP system is likely counted under Be Lean, which may be inflating the carbon savings.
</td><td></td></tr>
</table>

<table>
<tr><th>Stakeholder</th><th>Question/Comment</th><th>Response</th></tr>
<tr><td></td><td>
The following u-values, g-values and air tightness are proposed:

<table>
<tr><td>Floor u-value</td><td>0.22 W/m^{2}K</td></tr>
<tr><td>External wall u-value</td><td>0.20 W/m^{2}K</td></tr>
<tr><td>Roof u-value</td><td>0.18 W/m^{2}K</td></tr>
<tr><td>Door u-value</td><td>1.80 W/m^{2}K (pedestrian)
1.20 W/m^{2}K (vehicle)</td></tr>
<tr><td>Window u-value</td><td>1.40 W/m^{2}K</td></tr>
<tr><td>Air permeability rate</td><td>3 m^3/hm^2 @ 50Pa</td></tr>
<tr><td>Ventilation strategy</td><td>Mechanical ventilation with heat recovery (MVHR) to office areas</td></tr>
<tr><td>Low energy lighting</td><td>LED lighting throughout</td></tr>
<tr><td>Heating system (efficiency / emitter)</td><td>Warm air gas fired condensing heating with destratification fans for the units
ASHP with use of VRF/VRV air conditioning for the main office areas (should be Be Green only)
Local electric hot water generation for core areas
Direct electric heating to core areas</td></tr>
</table>

The applicant has noted that the space heating demand has been calculated conservatively, assuming that the industrial parts of the areas are also heated.

<u>Actions:</u>
- Please confirm that gas boilers were used as the baseline energy system for Be Lean. And what is the gross efficiency?
- What is the proposed g-value of the glazing?
- The ASHP system should only be modelled under Be Green, as this is a renewable energy technology. The savings modelled from the solar PV array amount to around 70 tCO_2 which is the exact saving under Be Green. Be Lean savings should be achieved with fabric efficiencies.
- How is lighting energy demand improved? Should consider daylight control and occupancy sensors for communal areas. Why have no roof lights, or additional (high level) glazing along the blank facades been proposed to reduce the lighting demand?
- To model the full energy demand for the active cooling, as proposed under the overheating strategy. Then include these energy demands into the carbon footprint of the development and update any
</td><td></td></tr>
</table>

Stakeholder	Question/Comment	Response
	offsetting requirements based on this. Overheating is dealt with in more detail below. **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. The development is within 500 meters of a planned future DEN, so the development is expected to secure connection subject to demonstration of technical feasibility and financial viability. The applicant considers the space heating demand for the offices to be low for the site, and therefore a connection to the DEN would not be suitable. The pre-application note advised that this site is located close to the interconnector route between the Energy Recovery Facility at Edmonton and Haringey's borough-wide DEN. The applicant was advised to liaise with Enfield and Haringey councils for the potential to connect, which has not been demonstrated. The applicant has noted that the demand for hot water and space heating for the office areas (assuming that the industrial areas will not need heating) will not be sufficient for a viable connection to the DEN. They also consider that the type of heating required would not be suitable for warehouse units, as these usually use gas-fired warm air heating or radiant heating. Connection to the DEN should be prioritised to comply with the heating hierarchy. No details behind the feasibility study have been provided to evidence the proposal not to connect. A site-wide strategy should be proposed with pipework from the centralised energy centre to the edge of the site for a future connection point. <u>Actions:</u> - Please re-consider the proposals in line with comments above and provide evidence where this is not feasible.	

<table>
<tr><th>Stakeholder</th><th>Question/Comment</th><th>Response</th></tr>
<tr><td></td><td>
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.

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 71 tCO_2 (61%) reduction of emissions are proposed under Be Green measures.

The total solar array across all seven units is estimated to produce around 289,898 kWh/year of renewable electricity per year, equivalent to an estimated reduction of 67.5 tCO_2/year. The arrays would be mounted on the roof of each unit, facing south. 25% of the north-facing roof will also include solar PV, with a 6° pitch, this will still deliver reasonable output.

<table>
<tr><td></td><td>Annual estimated generation (kWh/year)</td><td>Estimated carbon saving (tCO_2/year)</td></tr>
<tr><td>Unit 1</td><td>56,474</td><td>13.2</td></tr>
<tr><td>Unit 2</td><td>56,474</td><td>13.2</td></tr>
<tr><td>Unit 3</td><td>56,474</td><td>13.2</td></tr>
<tr><td>Unit 4</td><td>30,120</td><td>7</td></tr>
<tr><td>Unit 5</td><td>26,356</td><td>6.1</td></tr>
<tr><td>Unit 6</td><td>26,356</td><td>6.1</td></tr>
<tr><td>Unit 7</td><td>37,644</td><td>8.8</td></tr>
</table>
ASHP systems are proposed for the office area only, providing both heating and cooling. Other types of space heating are proposed to the warehouse (warm air gas-fired condensing heating with destratification fans) for the warehouse units, core areas (direct electric heating). Hot water would be generated by local low storage electric units. No further detail has been provided.

<u>Actions:</u>
- What is the peak output of the PV array, how much of the roof area will be covered approximately, what is the assumed efficiency, angle and orientation of the panels? The roof area could be maximised further, after introducing roof lights to reduce the lighting demand.
- Will the solar PV arrays be directly linked to the unit below, i.e. with their own dedicated systems?
- Was the use of battery storage assessed? Will there be significant expected evening/night-time use
</td><td></td></tr>
</table>

Stakeholder	Question/Comment	Response
	of electricity that would benefit from the solar PV arrays? - The roof should be light coloured to reduce solar heat gains and the improve efficiency of the solar panels. - Please identify on the plans where the air source heat pumps will be located and how the units will be mitigated in terms of visual and noise impact. - How much of the heating demand will be met by the proposed types of heat pumps? If this cannot be met fully, how will this be supplemented? - What is the Seasonal Coefficient of Performance (SCOP), the Seasonal Performance Factor (SFP) and Seasonal Energy Efficiency ratio (SEER) of the ASHP? - Please revise the strategy to consider a site-wide, single low-carbon heating system. **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 energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies. The applicant should install metering equipment on site, with sub-metering by unit. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of businesses. <u>Actions:</u> - Please confirm that sub-metering will be implemented for residential and commercial units. - What are the unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters, battery storage? **3. Carbon Offset Contribution** Any carbon shortfall identified as part of the Energy Plan (pre-commencement of development, to be secured as part of the S106), will need to be offset at £95/tCO_2 over 30 years. **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	

<table>
<tr><th>Stakeholder</th><th>Question/Comment</th><th>Response</th></tr>
<tr><td></td><td>
the Cooling Hierarchy.

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. The report has modelled two units with their office spaces and lobbies facing south (modelled a total of four areas), under the London Weather Centre files.

Results are listed in the table below.

<table>
<tr><th></th><th>Unit 4 office</th><th>Unit 4 lobby</th><th>Unit 7 lobby</th><th>Unit 7 office</th></tr>
<tr><td>DSY1 Scenario 1 mechanical ventilation only</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 2 mechanical ventilation + brise soleil</td><td>Fail (criteria 1,2,3)</td><td>Pass</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 3 mechanical ventilation + brise soleil + blinds</td><td>Fail (criteria 1,2,3)</td><td>Pass</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 4 cooling only</td><td>Pass</td><td>Pass</td><td>Pass</td><td>Pass</td></tr>
<tr><td>DSY1 2020s Cooling only</td><td>Pass</td><td>Pass</td><td>Pass</td><td>Pass</td></tr>
<tr><td>DSY1 2050s Cooling only</td><td>Pass</td><td>Pass</td><td>Pass</td><td>Pass</td></tr>
<tr><td>DSY1 2080s Cooling only</td><td>Pass</td><td>Pass</td><td>Pass</td><td>Pass</td></tr>
</table>

The applicant has stated that although Brise soleil and internal blinds reduce the overheating risk, they find it does not reduce it enough and they have only proposed active cooling through the air source heat pump systems.

Natural ventilation was discounted due to the noise levels within the immediate surroundings. Although, the report states that it could be explored with security consultants and acousticians.
</td><td></td></tr>
</table>

Stakeholder	Question/Comment	Response
	Overheating Actions: - The scenarios modelled do not follow the Cooling Hierarchy; the mitigation measures should be in order of the hierarchy. In addition, any cooling demand should be reduced - The weather files modelled should be DSY1 2020s, DSY 2 2020s, DSY3 2020s, DSY1 2050s - What level of mechanical cooling was modelled? - The modelling of future weather files should inform a future retrofit plan. - What is the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m^2 and MY/year? **5. Sustainability** Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. ***Non-Domestic BREEAM Requirement*** 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. The applicant has prepared a BREEAM Pre-Assessment Report for the commercial units. Based on this report, a score of 61.76% is expected to be achieved, equivalent to 'Very Good' rating. ***Urban Greening*** 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. The development achieves an Urban Greening Factor of 0.06, which does not comply with the interim minimum target of 0.3 for predominantly non-residential developments in London Plan Policy G5. This will be achieved through some tree, hedge and ground cover planting. ***Whole Life Carbon***	

Stakeholder	Question/Comment	Response
	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. No WLC statement has been submitted, the application is therefore not policy compliant. ***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. No CES has been submitted, the application is therefore not policy compliant. <u>Action</u>: - Submit a Circular Economy Statement - Submit a Whole Life Carbon Assessment - Please allocate an area designated for staff to be able to take a break outside. This area should be clear, safe from traffic and include greening to contribute to their wellbeing. - What consideration was given to retain the existing brick building along Willoughby Lane? The applicant should consider how it may retain parts of, or the whole existing building to allow for the continued use of the embodied carbon of the existing building, lowering the overall whole-life carbon of the proposal and promoting a circular economy. Where parts of the building might be demolished, its materials should be deconstructed following a pre-demolition audit, and reused on site before being reused elsewhere. **6. Conclusion** Overall, it is considered that the application **cannot be supported** as it does not currently meet the policy requirements. **Planning Conditions** To be secured (with detailed wording TBC): - Energy strategy - Potential for future DEN connection - Overheating - BREEAM Certificate - Circular Economy (Pre-Construction report, Post-Completion report) - Whole-Life Carbon	

<table>
<tr><th>Stakeholder</th><th>Question/Comment</th><th>Response</th></tr>
<tr><td></td><td>
- Biodiversity

Planning Obligations Heads of Terms
- Be Seen commitment to uploading energy data
- Energy Plan and Sustainability Review
- Carbon offset contribution (and associated obligations) at £2,850 per tCO_2 if the development does not meet the zero-carbon requirement at the Energy Plan or Sustainability Review stages.

Carbon Management Response 27/01/2023

In preparing this consultation response, we have reviewed:
- Energy Report prepared by Halligan Consulting Engineers (dated October 2022; Rev C)
- Circular Economy Statement prepared by ESC (dated 6 October 2022)
- Summary Response to Council Carbon Management Comments – Rev A (dated January 2023)
- TM52 Overheating Report, prepared by Halligan Consulting Engineers (Rev A dated January 2023)
- Site Layout Plan
- Future District Heating Zone, prepared by Halligan Consulting Engineers (Rev P6)
- Relevant supporting documents.

The revised and additional documents listed above were in response to the GLA Stage 1 comments, Design Officer Comments and Carbon Management Comments.

Energy
A slightly revised carbon reduction table is included below, based on revised architectural drawings following updates to the Design Officer comments.

<table>
<tr><td colspan="4">Non-residential (SAP10 emission factors)</td></tr>
<tr><td></td><td>Total regulated emissions (Tonnes CO_2 / year)</td><td>CO_2 savings (Tonnes CO_2 / year)</td><td>Percentage savings (%)</td></tr>
<tr><td>Part L 2013 baseline</td><td>118</td><td></td><td></td></tr>
<tr><td>Be Lean</td><td>67</td><td>51</td><td>43%</td></tr>
</table>
</td><td></td></tr>
</table>

Stakeholder	Question/Comment	Response

Be Clean	67	0	0%
Be Green	0	67	57%
Cumulative savings		118	100%
Carbon shortfall to offset (tCO_2)	No offset due		

Energy - Be Lean
The applicant confirmed a number of outstanding items:

- A gas boiler baseline was used for the TER and Be Lean scenarios
- G-values: 0.4 (windows); 0.51 (rooflights)
- Lighting demand was balanced against

Energy - Be Clean
In the GLA's post-stage 1 response to the applicants, the GLA have required the future occupiers to engage with the network operator to identify whether they can connect to the DEN.

No evidence was submitted by the developer of any convserations with the network operator, Energetik, requested in pre-application advice.

The DH plan outlines where the future DEN pipework could be laid by occupiers, but this pipework will not be delivered prior to the completion of this development. This means that individual occupiers would need to liaise with the network operator separately, and the business case to connect the development (and potentially wider area) would be less attractive or viable. Pipework should be installed between individual units to a single point of connection at the edge of the site.

There should also be an obligation on the developer to ensure leases with future occupiers require the future occupier to engage with Energetik in a timely fashion to discuss connection and supply agreements.

Appropriate obligations and conditions have been recommended to ensure the scheme is policy compliant.

Energy – Be Green
The individual units will have their own dedicated solar PV supply. Occupiers can explore battery solutions depending on their use requirements.

<table>
<tr><th>Stakeholder</th><th>Question/Comment</th><th>Response</th></tr>
<tr><td></td><td>
The layout plan includes annotated locations of the ASHP units which will supply 100% of the demand, with a SCOP of 3.5, EER of 3.5 and SEER of 5.0.

Overheating
The revised TM52 report sets out how it follows the Cooling Hierarchy, having run 6 scenarios based on the hierarchy. Scenario 5 (mechanical ventilation only; 10 l/s/person) was run for 2020s DSY1-3 and 2050s DSY1, for sample units 4 and 7. Scenario 6 includes a 31.9 kW cooling load, and 751 MJ/m^2/year.

The proposed overheating strategy is considered acceptable.

<table>
<tr><th></th><th>Unit 4 office</th><th>Unit 4 lobby</th><th>Unit 7 lobby</th><th>Unit 7 office</th></tr>
<tr><td>DSY1
Scenario 1 reduce internal gains and energy efficiency design</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 2 incl brise soleil and internal shading</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 3 exposed thermal mass and high ceilings</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 4 passive ventilation with additional infiltration</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 5 mechanical ventilation</td><td>Fail (criteria 1,2,3)</td><td>Pass (fail criteria 2 only)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 6 active cooling (VRF) through ASHP</td><td>Pass</td><td>Pass</td><td>Pass</td><td>Pass</td></tr>
<tr><td>DSY2 2020s scenarios 1-5</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY3 2020s scenarios 1-5</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
</table>
</td><td></td></tr>
</table>

Stakeholder	Question/Comment	Response

DSY1 2050s scenarios 1-5	Fail (criteria 1,2,3)	Fail (criteria 1,2,3)	Fail (criteria 1,2,3)	Fail (criteria 1,2,3)

Circular Economy
A Circular Economy Statement was submitted.

The principles used for this development are:

- Conserve resources, increase efficiency and source sustainably
- Design to eliminate waste (and for ease of maintenance)
- Manage waste sustainably and at the highest value
- Recycling of building materials that result from demolition of existing structures on site
- Avoiding damage to products by storing and handling correctly, including a systematic
- approach to storing offcuts
- Eliminating waste in the ordering process by implementing efficient procedures, i.e.
- eliminating over ordering
- Employing the use of materials that have been fabricated offsite, e.g. insulated wall
- panels and steel frames
- Investigating opportunities to use reclaimed materials and products with a high level of
- recycled content
- Ensuring material efficiency is achieved by avoiding over-specifying

Planning Obligations

- Be Seen commitment to uploading energy data
- Energy Plan and Sustainability Review
- Carbon offset contribution (and associated obligations) at £2,850 per tCO_2 if the development does not meet the zero-carbon requirement at the Energy Plan or Sustainability Review stages.
- Evidence of entering into a green lease with future occupiers require the future occupier to engage with Energetik in a timely fashion to discuss connection and supply agreements.

Planning conditions

Stakeholder	Question/Comment	Response
	<u>Energy Strategy</u> *The development hereby approved shall be constructed in accordance with the Energy Report rev C (dated October 2022) delivering a minimum 100% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, air source heat pumps (ASHPs) and a minimum XXX kWp solar photovoltaic (PV) array.* *(a) Prior to the commencement of above ground works, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:* - *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;* - *Evidence of discussions with the decentralised energy network operator on the viability of the development connecting;* - *A revised heating strategy following discussions with Energetik;* - *Confirmation of the necessary fabric efficiencies to achieve a minimum 15% reduction with SAP2012 carbon factors;* - *Location, specification and efficiency of any ASHPs, if they form part of the revised heating strategy, (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 the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); and how the energy will be used on-site before exporting to the grid;* - *Specification of any additional equipment installed to reduce carbon emissions;* - *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 arrays shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.* *(b) The solar PV arrays air source heat pumps must be installed and brought into use prior to first occupation of the relevant unit. Six months following the first occupation of that unit, evidence that the solar PV arrays*	

Stakeholder	Question/Comment	Response
	have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array and heat pump have been installed. *c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.* *<u>DEN Connection</u>* *Prior to the above ground commencement of construction work, details of the pipework location to enable a future DEN connection must be submitted to and approved by the local planning authority.* *Pipework shall be installed from the individual plant rooms to the edge of the site to a single point of connection, with ability to isolate each branch to each unit depending on whether it is connected. This shall include evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.* *<u>Urban Greening Factor</u>* *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 aimed for, ensuring that the landscaping proposals maximise 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.*	

Stakeholder	Question/Comment	Response
	<u>BREEAM</u> *(a) Prior to the above ground commencement, 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.* *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) Prior to occupation of the relevant unit, 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.* *<u>Circular Economy</u>* *Prior to the occupation [of any phase / building/ development], a Post-Construction Monitoring Report should be completed in line with the GLA's Circular Economy Statement Guidance.* *The relevant Circular Economy Statement shall be submitted to the GLA at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to the occupation [of any phase / building/ development.* *Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with London Plan (2021) Policies D3, SI2 and SI7, and Local Plan (2017) Policies SP4, SP6, and DM21.*	

Stakeholder	Question/Comment	Response
	Whole Life-Cycle Carbon *Prior to the occupation of each building, the post-construction tab of the GLA's Whole Life Carbon Assessment template should be completed in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the relevant building.* *Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.*	
Waste Management	The waste generated from this development will be classed as commercial and as such will not be collected by LBH or its contractors as part of our statutory collection duties. The is acknowledge on page 4 of the Waste Management and Recycling Statement supporting this application which is adequate for a development of this size/type. The site is accessible from Dyson's Road. A basic swept path analysis provided in Appendix 1, pg. 5, shows an RCV being able to turn on site meaning a vehicle can enter and leave in a forward gear. This plan also shows the location of 4 separate bins stores, split 2 at the front of site and 2 at the rear. The number and type of bins needed, and therefore the size of each bin store, is not mentioned within the statement. This will depend on the type of businesses that occupy the development/units in operation, the waste/recycling they generate, and the contracts put in place for the collection of this. The example bin storage units shown in appendix 2 of the statement look to be of a high standard, providing a secure compound and screening bins to improve the site aesthetic and minimise misuse. Commercial waste collection companies can provide up to twice daily collections 7 days per week. We would however advise against sizing the bins stores based on minimum size and maximum collections. The stores should be sufficient to store waste generated from the units in operation for one week.	Comments Noted
Building Control	I have looked at the plans, and fire consultant's report, for the development at the above site and have raised no issues at this stage, except that the rear means of escape routes to be clarified. The proposals will be subject to a full check under the Building Regulations 2010 when an application is submitted to Building Control.	Comments noted.
Flood & Water Management	Having reviewed the applicant's recently submitted :	Comments noted

Stakeholder	Question/Comment	Response
	1) Covering letter confirming response to our drainage comments dated 16th May 2022 2) Greenfield Run-off rate calculations using IH 124 method 3) Micro Drainage outputs for the Drainage Network calculations dated 16th May 2022 4) Propose drainage layout plan reference number 63282 / 101 revision T2 Along with previously submitted Flood Risk Assessment and Drainage Strategy report reference number 63282-01 Revision B dated 10th February 2022 prepared by PRP Environmental Consultant We have no further comments to make on the above planning application.	
Pollution Air Quality	Having considered the submitted supportive information relevant to our aspect of the work i.e. Sustainability and Energy Statement with reference 001077 – PL Version 1 prepared by Sustain Quality Ltd dated March 2022 taken note of the likely use of the most feasible green technologies for the development as Solar Photovoltaic Panels, Design and Access Statement dated July 2022 as well as the fact that one of the site is situated directly adjacent to an electric substation, please be advise that whilst we have no objection to the proposed development in relation to AQ and Land Contamination, the following planning conditions are recommend should planning permission be granted.	Comment Noted conditions attached.
EXTERNAL		
Thames Water	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. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/ working-near-our-pipes 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	Noted, informative attached.

Stakeholder	Question/Comment	Response
	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. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes Should you require further information please contact Thames Water. 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 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. 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. Water Comments There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes 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	

Stakeholder	Question/Comment	Response
	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.	

Stakeholder	Question/Comment	Response
Cllr Bevan	Comments: I am the Cllr responsible for responding to planning issues within this ward, I have visited the above address and my comments are based on my observations and local knowledge during my 19 years as a Cllr for this ward. I wish to emphasise the need for high quality design which Haringey aspires to for all types of development when a decision is made on this application. In addition I now refer to the MAYOR of London¿s published London Plan. I would require that this proposal will fully comply with the above plan and indeed building regulations. I would draw attention to the industrial estate on Leeside 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 standard¿s, 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 ? 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. I have concerns that this aspiration for improved design has not been achieved with this application. I note that this is a very prominent position in an area that has a very degraded adjacent street scene, in all aspects. I note also that this area is a nightmare concerning traffic congestion and all that goes with it, fumes / pollution etc. Residential accommodation is nearby! So, in relation to the above two comments, I would expect a very substantial 106 contribution to completely resolve the above two issues, including if appropriate the realignment of the road network. Until this has been agreed and it resolves the serious issues at this location i am objecting to this application.	Comments noted. Design addressed in paragraph 6.3.4. The proposal is comparable to other examples within its context. S.106 contributions are indicated in Head of Terms section. A condition has been attached requiring details of fencing. Transportation is addressed para 6.4.4 to 6.4.8

Stakeholder	Question/Comment	Response
Transportation	I have reviewed the above application, the transport consultant's response to my initial queries and taken account of the pre-application advice issued in 2020 (PRE/2020/0178). My final comments are set out below, alongside a set of recommended planning conditions and s.106 obligations. **Transport Assessment** <u>Development Proposals</u> The proposals involve the demolition of existing buildings and the erection of 5,592sqm (GIA) of employment floor space for flexible E (light industrial), B2 and B8 uses. The site would include seven individual units, each of which would have ancillary office space. On-site commuter and operational parking provision is also proposed on site. <u>Public Transport Assessment Level (PTAL)</u> The site's PTAL score is 2, according to TfL's WebCAT. A recalculation of the PTAL was requested at pre-application stage (notably to take account of the new Meridian Water station). The transport consultant has recalculated it and confirmed that the PTAL remains unchanged with a value of 2. It is however estimated that the PTAL could achieve 3 (moderate connectivity) once Phase 1 of Meridian Water is delivered and the journey time to Meridian Water station on foot is shortened as a result. <u>Personal Injury Collison (PIC) Data Analysis</u> Five years' worth of PIC data have been analysed and the conclusion drawn by the transport consultant is that there do not exist any current road safety issues related to the highway geometry and layout. As such, the Transport Assessment concludes that no intervention is needed as part of the development proposals. <u>Active Travel Zone (ATZ) Assessment</u> An ATZ assessment has been carried out. This was provided post submission during June 2022. A visit of the surroundings of the site was undertaken on Thursday 8th June 2022. Four routes from the site	Noted conditions attached

Stakeholder	Question/Comment	Response
	were assessed: • Route 1: Leeside Road Bus Stop (Stop NH) via Dysons Road and Willoughby Lane; • Route 2: Meridian Water Underground Station via Leeside Road and Meridian Water Development; • Route 3: Brantwood Road Bus Stop (Stop V) via Brantwood Road; and • Route 4: White Hart Lane Overground Station via A1010 High Road and Moselle Street. In summary, the assessment has identified that the Dysons Road/Leeside Road/Willoughby Lane/Brantwood Road junction is currently difficult to cross for pedestrians due to the absence of formal crossing points. Although there are dropped kerbs and central refuge points on each approach to the roundabout, the pedestrian crossings are uncontrolled and informal. In addition, not all of them have tactile paving. The assessment has also highlighted issues with footway parking including HGV parking encroaching on footway widths. We have sought financial contributions towards the feasibility and implementation of zebra crossings on each approach to the roundabout. The TA has detailed that there will be an approximate tripling of trips to the site compared to present with over 600 trips being made predominantly by foot to access the site within a typical 12 hour period. This number will likely increase as travel plan measures affect mode shares over time increasing active and sustainable trips. The applicant has now proposed making a £120,000 financial contribution towards the implementation of improved pedestrian crossing facilities at the Dysons Road/Leeside Road/Willoughby Lane/Brantwood Road junction, and this is welcomed. In addition to this a £50,000 contribution towards feasibility and design of the Brantwood Road protected cycle track facility is sought to ensure that there is an improvement in cycling environment and infrastructure and it is understood the applicant is amenable to this contribution too. <u>Existing Travel Patterns</u> The existing travel patterns have been derived from 2011 Census workplace modal split data. The existing modal split suggested by the transport consultant is derived from Middle-Layer Super Output Area (MSOA) Haringey 002. This has been compared with the modal split associated with Workplace Zone E33029853 taken from 2011 Census table *WP7103EW - Workplace and usual residence by method of travel to work (2001 specification) (Workplace population).* This workplace zone is illustrated below and is smaller than	

<table>
<tr><th>Stakeholder</th><th>Question/Comment</th><th>Response</th></tr>
<tr><td></td><td>MSOA Haringey 002.

Both modal splits are comparable, therefore the existing modal split in the Transport Assessment is considered acceptable.

Modal Split Comparison
<table>
<tr><th></th><th>Haringey 002</th><th>Workplace Zone E33029853</th></tr>
<tr><td>Underground, metro, light rail or tram</td><td>7.1%</td><td>9%</td></tr>
<tr><td>Train</td><td>3.6%</td><td>6%</td></tr>
<tr><td>Bus, minibus or coach</td><td>23.6%</td><td>18%</td></tr>
<tr><td>Taxi</td><td>0.3%</td><td>0%</td></tr>
<tr><td>Motorcycle, scooter or moped</td><td>0.0%</td><td>1%</td></tr>
<tr><td>Driving a car or van</td><td>55.1%</td><td>53%</td></tr>
<tr><td>Passenger in a car or van</td><td>3.0%</td><td>4%</td></tr>
<tr><td>Bicycle</td><td>1.6%</td><td>3%</td></tr>
<tr><td>On foot</td><td>5.8%</td><td>6%</td></tr>
</table>

Workplace Zone E33029853</td><td></td></tr>
</table>

Stakeholder	Question/Comment	Response
	 <u>Proposed Vehicle Access</u> A new vehicle access is proposed, involving the relocation of the current access point some 15m north of its existing position. This would involve highway works to be carried out under a s.278 highway agreement and an amendment to the Traffic Management Order to reflect changes to the on-street parking layout. A Stage 1 Road Safety Audit (RSA) has been undertaken independently. The recommendations raised by the RSA and designer's response have been reviewed. All recommendations are to be addressed as part of the S.278 works, namely the provision of an adequate pedestrian crossing point across the new crossover and for the footway to be made good and continuous along the site on Dysons Road. A Stage 2 RSA would be secured by planning condition.	

Stakeholder	Question/Comment	Response
	Visibility splays have been prepared, based on the 85th percentile observed speeds derived from the ATC surveys, comprised between 17 and 20mph. The minimum requirements for the visibility splays at the proposed access point are met. The applicant has suggested that site access management be covered by a pre-occupation requirement involving the preparation of a Site Access Management Strategy. It is considered that this could be set out both in the Detailed Delivery and Servicing Plan to be secured by planning condition and the Car Parking Management Plan to be secured by s.106 planning obligation. The gated access to the site would be open between the hours of 07:00 and 19:00, and closed at night, thereby considerably minimising the chance of vehicles waiting on the public highway before entering the site. <u>Proposed Pedestrian and Cycle Access</u> The applicant has outlined the reasons for providing a single point of access for both vehicles, pedestrians and cyclists, including for site security and to retain landscaped areas on site. The proposed site access would provide footpaths on either side; this is considered sufficient considering the low levels of forecast baseline and future-year pedestrian and cycle traffic into and out of the site. As part of the s.278 highway works, we would expect tactile paving to be provided at both ends of the new access point. <u>Proposed Delivery and Servicing Arrangements</u> Swept paths have been provided showing how a 16.5m articulated lorry and an 8m box van would access and egress the site, as well as manoeuvre in and out of on-site loading bays. A dedicated turning area is shown for HGVs wanting to exit the site. <u>Proposed Vehicle Parking</u> The transport consultant is following the approach set out in the London Plan (Paragraph 10.6.18) to calculate the appropriate amount of car parking to be provided on site: *"For industrial sites, the role of parking – both for workers and operational vehicles – varies considerably depending on location and the type of development proposed. Provision should therefore be determined on a case-by-case basis, with the starting point for commuter parking being the standards in Table 10.4 with differences in employment densities taken into account. Flexibility may then be applied in light of site-specific*	

Stakeholder	Question/Comment	Response
	circumstances as above. Operational parking should be considered and justified separately." *Commuter Parking* The Employment Density Guide (2015) by the Homes and Communities Agency indicates that the B1c employee density is 1 per 47sqm NIA. B2 and B8 have different densities, and it is noted that B2 uses have a greater employee density at 1 per 36sqm GIA. If we use the B1c employee density as a guide, apply it to the 5,369sqm NIA, then it is predicted that there would be 114 employees. Applying a car mode share of 53% gives a total of 60 spaces. If we used the B2 employee density as a guide, then there would be up to 155 employees, and the resulting parking demand up to 82 spaces. With B8 uses, employee densities vary between 1 per 95sqm GEA and 1 per 70sqm GEA, the number of employees would range between 62 and 84, and the parking demand between 33 and 45 spaces. Depending on the mix of industrial uses on site, the parking demand would therefore vary between 33 and 82 spaces. The transport consultant justifies a provision of 44 spaces. The TRICS parking accumulation indicates that the maximum on-site commuter parking demand would be 62, this is confirmed by using the B1c employee density and a 53% car mode share as derived from 2011 Census data, as outlined above. With a 38% car mode share applied, this requirement would be lowered to 44 spaces. Whilst it is agreed that the car mode share in this workplace zone encompassing the site may have decreased over the last decade since the 2011 Census, a decrease of 15 percent points is not substantiated. The 38% mode share is presented in the Framework Travel Plan as a target at the Year Five horizon and therefore should be avoided to calculate the parking requirement from the outset. However, it is welcome to have an ambitious target for the Travel Plan. It is noted this satisfies a requirement of London Plan (2021) Policy T6.2 Office Parking to achieve a reduction in car parking provision over time and its conversion to other uses, via Travel Plan mechanisms. Owing to on-site spatial constraints, the on-site car park occupancy of 44 spaces is accepted but is unlikely to be achieved until the implementation of Travel Plan measures is well underway. It is most certainly possible that on-street parking would be required to accommodate the surplus of parking demand in the first few years of operation of the proposed development, i.e. approximately 18 spaces. A parking stress survey was undertaken on two days in May 2022 between 07:00 and 19:00 within 300m walking distance of the site. The survey results show there is ample spare capacity in local streets, therefore any surplus parking demand generated by the proposed development could be easily located on street. In either case, the calculated requirement of 44 spaces is much higher than the maximum provision allowed for by the London Plan (2021) maximum standards: Lee Valley Opportunity Area of up to 1 space per	

Stakeholder	Question/Comment	Response
	600sqm GIA, with up to 9 spaces on site, but it does reflect the need to determine an adequate provision on a case-by-case basis. It is suggested that 44 spaces would accord with the London Plan standards (1 space per 125sqm), this is incorrect as the right standard to use is 1 space per 600sqm GIA in this case. On balance, it is important not to underprovide parking on site therefore the suggested 44 spaces are considered appropriate, in line with the level of flexibility sought as allowed by the London Plan. We would however require that a Parking and Design Management Plan be secured by s.106 agreement and tied with the monitoring of the Travel Plan, to ensure the decrease in demand over the monitoring period and minimise the demand for on-street parking and on site. *Operational Parking* Paragraph 10.6.18 of the London Plan (2021) states that *"Operational parking should be considered and justified separately."* The ground-floor plan shows a total of 7 bays (3 for HGVS and 4 for MGVs). The transport consultant says that the site layout has been designed to accommodate 3 HGVs and 15 LGVs simultaneously, which would be sufficient to cater for the peak operational vehicle demand identified between 09:00 and 10:00 of 12 vehicles (2 HGVs and 10 LGVs). However, it is not clear from the site layout in Appendix B of the addendum document how all LGVs would be accommodated outside the proposed marked bays. Suitable locations would need to be illustrated clearly in the Detailed Delivery and Servicing Plan (to be conditioned) to highlight how this would work within the site from a management perspective as there are no further marked bays. <u>Car Parking Management Plan</u> A Car Parking Management Plan has been prepared. It is intended for a detailed version of the document to be also secured by s.106 planning obligation. It is proposed that 10% of the 44 car parking spaces be fitted with electric vehicle charging points. There are no specific standards for electric vehicle infrastructure for commuter parking for the proposed land uses. It is noted that, in accordance with Policy T6.2 Office Parking of the London Plan, *"all operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles"*. Therefore, we would expect all operational parking spaces/loading bays to have such equipment. Additionally, 5% of the commuter car parking spaces would be allocated to car sharers, with regular	

Stakeholder	Question/Comment	Response
	monitoring of their use by the Travel Plan Co-ordinator and in conjunction with Travel Plan surveys. The intention would be to review demand and deliver additional spaces for car sharers as and when required by converting regular commuter spaces on site. In excess of the London Plan (2021) minimum accessible parking provision requirements (up to 10%), 16% of the 44 spaces would be designated for disabled users, which is welcome. Their use would also be monitored through the Travel Plan and, should there not be demand for all disabled users' spaces, the Parking Design and Management Plan should highlight a mechanism for the conversion of some of them into regular spaces to increase on-site parking capacity and further limit the impact upon local on-street provision. <u>Proposed Cycle Parking</u> The proposed cycle parking numbers have been calculated on the basis of a GEA of 5,996sqm on the basis of the B1 Light Industrial standards, the most onerous requirements amongst the proposed land uses. It is proposed to provide a minimum of 24 long-stay and 6 short-stay cycle parking spaces, which accords with the minimum standards. It is noted that at least 5% of the long-stay provision (rounded up to 2 spaces) would be for larger cycles. Full adherence to the London Cycling Design Standards (LCDS) is expected, including the following principles: • Long-stay parking: secure (with access for employees only), lockable and covered/sheltered; and • Short-stay (visitor) parking: secure, conveniently located close to the entrances and overlooked. It is advised that all short-stay cycle parking should be provided in the form of Sheffield stands. All minimum dimensional and spacing requirements should comply with the LCDS. Cycle access should avoid any stairs, narrow doorways or gates of less than 1.2m in width. The adequacy of the long-stay and short-stay cycle parking and access arrangements would be secured by planning condition. This would involve the provision of full details showing the parking systems to be used, access to them, the layout and space around the cycle parking spaces with all dimensions marked up on plans. <u>Trip Generation</u>	

Stakeholder	Question/Comment	Response
	Existing / Extant Use Traffic Generation The existing vehicle trip generation in Table 9 is obtained by multiplying existing person trips by the car mode share, 53%, which is accepted. At the Council's request, calculations based on the modal split derived from the 2011 Census method-of-travel-to-work data have been extended to obtain the existing multi-modal trip generation disaggregated per mode for all other modes (in addition to vehicles). The existing operational vehicle trip generation has also been derived separately from TRICS and added to the existing (commuter) multi-modal trip generation. *Proposed Development Traffic Generation* The TRICS selection is accepted. In line with the existing trip generation, a baseline car mode share of 53% has also been used for the proposed trip generation. The 38% car mode share is only aspirational and a target set to be met by Year Five in the Framework Travel Plan. The proposed operational vehicle trip generation has also been derived separately from TRICS and added to the proposed (commuter) multi-modal trip generation. *Net Trip Generation Assessment and Impact* The net multi-modal trip generation has been derived from proposed and existing multi-modal trips. It is forecast that the development proposals would generate an additional 38 two-way and 5 two-way person trips in the AM and PM peak hours respectively. Operational (delivery and servicing) movements would see an increase of 34 two-way and 9 two-way movements in the AM and PM peak hours respectively. The biggest increase would come from commuter and operational vehicles, however the impact on the local highway network would be minimal. Likewise, the net impact on all different modes of transport would not be material. **Framework Travel Plan** The Framework Travel Plan is acceptable. In order to discourage private car use for commuting, future versions of the Travel Plan would need to set out the mechanism to monitor on-site car park usage, with the aim of gradually decommissioning spaces to accompany the reduction in the car mode share over time. This	

Stakeholder	Question/Comment	Response
	would be linked to a Parking Design and Management Plan to be secured by s.106 planning obligation. **Outline Delivery and Servicing Plan** The Outline Delivery and Servicing Plan is acceptable. As stated above, the transport consultant says that the site layout has been designed to accommodate 3 HGVs and 15 LGVs simultaneously, which should be sufficient to cater for the predicted peak demand (established to be 12 vehicles – 2 HGVs and 10 LGVs). The site layout does not clearly show where all 12 operational vehicles could park on site, as there is a limited number of operational parking bays. A Detailed Delivery and Servicing Plan would be required by planning condition and need to illustrate how the peak demand for operational parking would be fully contained on site and managed. It is understood that refuse and recycling storage would be located within the service yard. Collection would be undertaken by a private company and should be carried out within the site to minimise the impact on the public highway. **Outline Construction Logistics Plan** It is disappointing that not even an indicative demolition and construction programme has been provided. A Detailed Construction Logistics Plan would be conditioned. A highway condition surveys planning condition (pre- and post-works surveys including of footways and carriageways along the site) is recommended. **Framework Construction Environmental Management Plan** No comment. A Detailed Demolition and Construction Environmental Management Plan would be secured by planning condition. **Recommended Planning Conditions** • Cycle Parking Details – to meet TfL's London Cycle Design Standards • Detailed Delivery and Servicing Plan	

Stakeholder	Question/Comment	Response
	• Detailed Construction Logistics Plan • Highway Condition Surveys • Detailed Demolition and Construction Environmental Management Plan • Detailed design for new Highway Access including stage 1 and Stage 2 Road Safety Audits **Recommended S.106 Heads of Terms** • Travel Plan and contribution of £3,000 per year for 5 years • Parking Design and Management Plan • S.278 Agreement for Highway Works • £120,000 contribution towards improvement of pedestrian crossing facilities at the Dysons Road/Leeside Road/Willoughby Lane/Brantwood Road junction • £50,000 contribution towards feasibility and design of the Brantwood Road protected cycle track facility **Summary** This application is for the demolition of the existing buildings at 175 Willoughby Lane and the erection of 5,592sqm (GIA) of employment floor space for flexible E (light industrial), B2 and B8 uses. The site would include seven individual units, each of which would have ancillary office space. There will be associated car and cycle parking and the relocation of the existing highways access to suit the new arrangements. Transportation have considered the proposals and note the associated transportation demands and impacts that will arise. There will be uplifts in movements by all modes to and from the site, highways changes, and the applicant has included a Travel Plan, Delivery and Servicing Plan and an outline Construction Logistics	

Stakeholder	Question/Comment	Response
	Plan in their submission to demonstrate how the transport aspects and impacts will be managed. Overall, the application is considered acceptable, subject to the planning conditions and S106 obligations detailed above this response summary.	
Carbon Management	**Carbon Management Response 01/08/2022** In preparing this consultation response, we have reviewed: • Energy Report prepared by Halligan Consulting Engineers (dated September 2021; Rev A) ○ Including a BREEAM New Construction 2018 Pre-Assessment Report prepared by ESC Environmental Difference (dated May 2021) • Overheating Assessment prepared by Halligan Consulting Engineers (dated July 2021) • Relevant supporting documents. **7. Summary** The development achieves a reduction of 101% carbon dioxide emissions on site, which is supported. No carbon offsetting contribution will be due as the development is considered zero carbon in planning policy terms. Further work is required under the Overheating Strategy. The Circular Economy Statement and Whole Life Carbon Assessment have not been submitted. Appropriate planning conditions will be recommended once this information has been provided. **8. Energy – Overall**	No objection subject to conditions and obligations

Stakeholder	Question/Comment	Response
	Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013)). The London Plan (2021) further confirms this in Policy SI2. The overall predicted reduction in CO_2 emissions for the development shows an improvement of approximately 101% in carbon emissions with SAP10 carbon factors, from the Baseline development model (which is Part L 2013 compliant). This represents an annual saving of approximately 119 tonnes of CO_2 from a baseline of 118 tCO_2/year. 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 221 tCO_2.	

Non-residential (SAP10 emission factors)

	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2013 baseline	118		
Be Lean	70	47	40%
Be Clean	70	0	0%
Be Green	-1	71	61%
Cumulative savings		119	101%
Carbon shortfall to offset (tCO_2)	No offset due		

Energy – Lean
The applicant has proposed a saving of 61 tCO_2 in carbon emissions (37%) through improved energy efficiency standards in key elements of the build, based on SAP2012 carbon factors. This goes beyond the minimum 15% reduction respectively set in London Plan Policy SI2, so this is supported. However, it is noted that the ASHP system is likely counted under Be Lean, which may be inflating the carbon savings.

The following u-values, g-values and air tightness are proposed:

Floor u-value	0.22 W/m^2K

Stakeholder	Question/Comment	Response

External wall u-value	0.20 W/m^{2}K
Roof u-value	0.18 W/m^{2}K
Door u-value	1.80 W/m^{2}K (pedestrian) 1.20 W/m^{2}K (vehicle)
Window u-value	1.40 W/m^{2}K
Air permeability rate	3 m^3/hm^2 @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery (MVHR) to office areas
Low energy lighting	LED lighting throughout
Heating system (efficiency / emitter)	Warm air gas fired condensing heating with destratification fans for the units ASHP with use of VRF/VRV air conditioning for the main office areas (should be Be Green only) Local electric hot water generation for core areas Direct electric heating to core areas

The applicant has noted that the space heating demand has been calculated conservatively, assuming that the industrial parts of the areas are also heated.

Actions:

- Please confirm that gas boilers were used as the baseline energy system for Be Lean. And what is the gross efficiency?
- What is the proposed g-value of the glazing?
- The ASHP system should only be modelled under Be Green, as this is a renewable energy technology. The savings modelled from the solar PV array amount to around 70 tCO_2 which is the exact saving under Be Green. Be Lean savings should be achieved with fabric efficiencies.
- How is lighting energy demand improved? Should consider daylight control and occupancy sensors for communal areas. Why have no roof lights, or additional (high level) glazing along the blank facades been proposed to reduce the lighting demand?
- To model the full energy demand for the active cooling, as proposed under the overheating strategy. Then include these energy demands into the carbon footprint of the development and update any offsetting requirements based on this.

Overheating is dealt with in more detail below.

Stakeholder	Question/Comment	Response
	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. The development is within 500 meters of a planned future DEN, so the development is expected to secure connection subject to demonstration of technical feasibility and financial viability. The applicant considers the space heating demand for the offices to be low for the site, and therefore a connection to the DEN would not be suitable. The pre-application note advised that this site is located close to the interconnector route between the Energy Recovery Facility at Edmonton and Haringey's borough-wide DEN. The applicant was advised to liaise with Enfield and Haringey councils for the potential to connect, which has not been demonstrated. The applicant has noted that the demand for hot water and space heating for the office areas (assuming that the industrial areas will not need heating) will not be sufficient for a viable connection to the DEN. They also consider that the type of heating required would not be suitable for warehouse units, as these usually use gas-fired warm air heating or radiant heating. Connection to the DEN should be prioritised to comply with the heating hierarchy. No details behind the feasibility study have been provided to evidence the proposal not to connect. A site-wide strategy should be proposed with pipework from the centralised energy centre to the edge of the site for a future connection point. <u>Actions:</u> - Please re-consider the proposals in line with comments above and provide evidence where this is not feasible. **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.	

<table>
<tr><th>Stakeholder</th><th>Question/Comment</th><th>Response</th></tr>
<tr><td></td><td>
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 71 tCO_2 (61%) reduction of emissions are proposed under Be Green measures.

The total solar array across all seven units is estimated to produce around 289,898 kWh/year of renewable electricity per year, equivalent to an estimated reduction of 67.5 tCO_2/year. The arrays would be mounted on the roof of each unit, facing south. 25% of the north-facing roof will also include solar PV, with a 6° pitch, this will still deliver reasonable output.

<table>
<tr><th></th><th>Annual estimated generation (kWh/year)</th><th>Estimated carbon saving (tCO_2/year)</th></tr>
<tr><td>Unit 1</td><td>56,474</td><td>13.2</td></tr>
<tr><td>Unit 2</td><td>56,474</td><td>13.2</td></tr>
<tr><td>Unit 3</td><td>56,474</td><td>13.2</td></tr>
<tr><td>Unit 4</td><td>30,120</td><td>7</td></tr>
<tr><td>Unit 5</td><td>26,356</td><td>6.1</td></tr>
<tr><td>Unit 6</td><td>26,356</td><td>6.1</td></tr>
<tr><td>Unit 7</td><td>37,644</td><td>8.8</td></tr>
</table>

ASHP systems are proposed for the office area only, providing both heating and cooling. Other types of space heating are proposed to the warehouse (warm air gas-fired condensing heating with destratification fans) for the warehouse units, core areas (direct electric heating). Hot water would be generated by local low storage electric units. No further detail has been provided.

<u>Actions:</u>
- What is the peak output of the PV array, how much of the roof area will be covered approximately, what is the assumed efficiency, angle and orientation of the panels? The roof area could be maximised further, after introducing roof lights to reduce the lighting demand.
- Will the solar PV arrays be directly linked to the unit below, i.e. with their own dedicated systems?
- Was the use of battery storage assessed? Will there be significant expected evening/night-time use of electricity that would benefit from the solar PV arrays?
- The roof should be light coloured to reduce solar heat gains and the improve efficiency of the solar panels.
- Please identify on the plans where the air source heat pumps will be located and how the units will be
</td><td></td></tr>
</table>

Stakeholder	Question/Comment	Response
	mitigated in terms of visual and noise impact. - How much of the heating demand will be met by the proposed types of heat pumps? If this cannot be met fully, how will this be supplemented? - What is the Seasonal Coefficient of Performance (SCOP), the Seasonal Performance Factor (SFP) and Seasonal Energy Efficiency ratio (SEER) of the ASHP? - Please revise the strategy to consider a site-wide, single low-carbon heating system. **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 energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies. The applicant should install metering equipment on site, with sub-metering by unit. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of businesses. <u>Actions:</u> - Please confirm that sub-metering will be implemented for residential and commercial units. - What are the unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters, battery storage? **9. Carbon Offset Contribution** Any carbon shortfall identified as part of the Energy Plan (pre-commencement of development, to be secured as part of the S106), will need to be offset at £95/tCO_2 over 30 years. **10. 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. 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. The report has modelled two units	

<table>
<tr><th>Stakeholder</th><th>Question/Comment</th><th>Response</th></tr>
<tr><td></td><td>
with their office spaces and lobbies facing south (modelled a total of four areas), under the London Weather Centre files.

Results are listed in the table below.

<table>
<tr><th></th><th>Unit 4 office</th><th>Unit 4 lobby</th><th>Unit 7 lobby</th><th>Unit 7 office</th></tr>
<tr><td>DSY1 Scenario 1 mechanical ventilation only</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 2 mechanical ventilation + brise soleil</td><td>Fail (criteria 1,2,3)</td><td>Pass</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 3 mechanical ventilation + brise soleil + blinds</td><td>Fail (criteria 1,2,3)</td><td>Pass</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 4 cooling only</td><td>Pass</td><td>Pass</td><td>Pass</td><td>Pass</td></tr>
<tr><td>DSY1 2020s Cooling only</td><td>Pass</td><td>Pass</td><td>Pass</td><td>Pass</td></tr>
<tr><td>DSY1 2050s Cooling only</td><td>Pass</td><td>Pass</td><td>Pass</td><td>Pass</td></tr>
<tr><td>DSY1 2080s Cooling only</td><td>Pass</td><td>Pass</td><td>Pass</td><td>Pass</td></tr>
</table>

The applicant has stated that although Brise soleil and internal blinds reduce the overheating risk, they find it does not reduce it enough and they have only proposed active cooling through the air source heat pump systems.

Natural ventilation was discounted due to the noise levels within the immediate surroundings. Although, the report states that it could be explored with security consultants and acousticians.

<u>Overheating Actions:</u>
- The scenarios modelled do not follow the Cooling Hierarchy; the mitigation measures should be in order of the hierarchy. In addition, any cooling demand should be reduced
</td><td></td></tr>
</table>

Stakeholder	Question/Comment	Response
	- The weather files modelled should be DSY1 2020s, DSY 2 2020s, DSY3 2020s, DSY1 2050s - What level of mechanical cooling was modelled? - The modelling of future weather files should inform a future retrofit plan. - What is the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m^2 and MY/year? **11. Sustainability** Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. ***Non-Domestic BREEAM Requirement*** 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. The applicant has prepared a BREEAM Pre-Assessment Report for the commercial units. Based on this report, a score of 61.76% is expected to be achieved, equivalent to 'Very Good' rating. ***Urban Greening*** 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. The development achieves an Urban Greening Factor of 0.06, which does not comply with the interim minimum target of 0.3 for predominantly non-residential developments in London Plan Policy G5. This will be achieved through some tree, hedge and ground cover planting. ***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. No WLC statement has been submitted, the application is therefore not policy compliant.	

Stakeholder	Question/Comment	Response
	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. No CES has been submitted, the application is therefore not policy compliant. Action: - Submit a Circular Economy Statement - Submit a Whole Life Carbon Assessment - Please allocate an area designated for staff to be able to take a break outside. This area should be clear, safe from traffic and include greening to contribute to their wellbeing. - What consideration was given to retain the existing brick building along Willoughby Lane? The applicant should consider how it may retain parts of, or the whole existing building to allow for the continued use of the embodied carbon of the existing building, lowering the overall whole-life carbon of the proposal and promoting a circular economy. Where parts of the building might be demolished, its materials should be deconstructed following a pre-demolition audit, and reused on site before being reused elsewhere. **12. Conclusion** Overall, it is considered that the application **cannot be supported** as it does not currently meet the policy requirements. **Planning Conditions** To be secured (with detailed wording TBC): - Energy strategy - Potential for future DEN connection - Overheating - BREEAM Certificate - Circular Economy (Pre-Construction report, Post-Completion report) - Whole-Life Carbon - Biodiversity **Planning Obligations Heads of Terms** - Be Seen commitment to uploading energy data	

<table>
<tr><th>Stakeholder</th><th>Question/Comment</th><th>Response</th></tr>
<tr><td></td><td>
- Energy Plan and Sustainability Review
- Carbon offset contribution (and associated obligations) at £2,850 per tCO_2 if the development does not meet the zero-carbon requirement at the Energy Plan or Sustainability Review stages.

Carbon Management Response 27/01/2023

In preparing this consultation response, we have reviewed:

- Energy Report prepared by Halligan Consulting Engineers (dated October 2022; Rev C)
- Circular Economy Statement prepared by ESC (dated 6 October 2022)
- Summary Response to Council Carbon Management Comments – Rev A (dated January 2023)
- TM52 Overheating Report, prepared by Halligan Consulting Engineers (Rev A dated January 2023)
- Site Layout Plan
- Future District Heating Zone, prepared by Halligan Consulting Engineers (Rev P6)
- Relevant supporting documents.

The revised and additional documents listed above were in response to the GLA Stage 1 comments, Design Officer Comments and Carbon Management Comments.

Energy

A slightly revised carbon reduction table is included below, based on revised architectural drawings following updates to the Design Officer comments.

<table>
<tr><td colspan="4">Non-residential (SAP10 emission factors)</td></tr>
<tr><td></td><td>Total regulated emissions (Tonnes CO_2 / year)</td><td>CO_2 savings (Tonnes CO_2 / year)</td><td>Percentage savings (%)</td></tr>
<tr><td>Part L 2013 baseline</td><td>118</td><td></td><td></td></tr>
<tr><td>Be Lean</td><td>67</td><td>51</td><td>43%</td></tr>
<tr><td>Be Clean</td><td>67</td><td>0</td><td>0%</td></tr>
<tr><td>Be Green</td><td>0</td><td>67</td><td>57%</td></tr>
<tr><td>Cumulative savings</td><td></td><td>118</td><td>100%</td></tr>
</table>

</td><td></td></tr>
</table>

Stakeholder	Question/Comment	Response
	Carbon shortfall to offset (tCO_2) | No offset due **Energy - Be Lean** The applicant confirmed a number of outstanding items: - A gas boiler baseline was used for the TER and Be Lean scenarios - G-values: 0.4 (windows); 0.51 (rooflights) - Lighting demand was balanced against **Energy - Be Clean** In the GLA's post-stage 1 response to the applicants, the GLA have required the future occupiers to engage with the network operator to identify whether they can connect to the DEN. No evidence was submitted by the developer of any convserations with the network operator, Energetik, requested in pre-application advice. The DH plan outlines where the future DEN pipework could be laid by occupiers, but this pipework will not be delivered prior to the completion of this development. This means that individual occupiers would need to liaise with the network operator separately, and the business case to connect the development (and potentially wider area) would be less attractive or viable. Pipework should be installed between individual units to a single point of connection at the edge of the site. There should also be an obligation on the developer to ensure leases with future occupiers require the future occupier to engage with Energetik in a timely fashion to discuss connection and supply agreements. Appropriate obligations and conditions have been recommended to ensure the scheme is policy compliant. **Energy – Be Green** The individual units will have their own dedicated solar PV supply. Occupiers can explore battery solutions depending on their use requirements. The layout plan includes annotated locations of the ASHP units which will supply 100% of the demand, with a SCOP of 3.5, EER of 3.5 and SEER of 5.0. **Overheating**	

<table>
<tr><th>Stakeholder</th><th>Question/Comment</th><th>Response</th></tr>
<tr><td></td><td>
The revised TM52 report sets out how it follows the Cooling Hierarchy, having run 6 scenarios based on the hierarchy. Scenario 5 (mechanical ventilation only; 10 l/s/person) was run for 2020s DSY1-3 and 2050s DSY1, for sample units 4 and 7. Scenario 6 includes a 31.9 kW cooling load, and 751 MJ/m^2/year.

The proposed overheating strategy is considered acceptable.

<table>
<tr><th></th><th>Unit 4 office</th><th>Unit 4 lobby</th><th>Unit 7 lobby</th><th>Unit 7 office</th></tr>
<tr><td>DSY1 Scenario 1 reduce internal gains and energy efficiency design</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 2 incl brise soleil and internal shading</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 3 exposed thermal mass and high ceilings</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 4 passive ventilation with additional infiltration</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 5 mechanical ventilation</td><td>Fail (criteria 1,2,3)</td><td>Pass (fail criteria 2 only)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 Scenario 6 active cooling (VRF) through ASHP</td><td>Pass</td><td>Pass</td><td>Pass</td><td>Pass</td></tr>
<tr><td>DSY2 2020s scenarios 1-5</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY3 2020s scenarios 1-5</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
<tr><td>DSY1 2050s scenarios 1-5</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td><td>Fail (criteria 1,2,3)</td></tr>
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Circular Economy
</td><td></td></tr>
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Stakeholder	Question/Comment	Response
	A Circular Economy Statement was submitted. The principles used for this development are: - Conserve resources, increase efficiency and source sustainably - Design to eliminate waste (and for ease of maintenance) - Manage waste sustainably and at the highest value - Recycling of building materials that result from demolition of existing structures on site - Avoiding damage to products by storing and handling correctly, including a systematic - approach to storing offcuts - Eliminating waste in the ordering process by implementing efficient procedures, i.e. - eliminating over ordering - Employing the use of materials that have been fabricated offsite, e.g. insulated wall - panels and steel frames - Investigating opportunities to use reclaimed materials and products with a high level of - recycled content - Ensuring material efficiency is achieved by avoiding over-specifying **Planning Obligations** - Be Seen commitment to uploading energy data - Energy Plan and Sustainability Review - Carbon offset contribution (and associated obligations) at £2,850 per tCO_2 if the development does not meet the zero-carbon requirement at the Energy Plan or Sustainability Review stages. - Evidence of entering into a green lease with future occupiers require the future occupier to engage with Energetik in a timely fashion to discuss connection and supply agreements. **Planning conditions** *<u>Energy Strategy</u>* *The development hereby approved shall be constructed in accordance with the Energy Report rev C (dated October 2022) delivering a minimum 100% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, air source heat pumps (ASHPs)*	

Stakeholder	Question/Comment	Response
	and a minimum XXX kWp solar photovoltaic (PV) array. *(a) Prior to the commencement of above ground works, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:* - *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;* - *Evidence of discussions with the decentralised energy network operator on the viability of the development connecting;* - *A revised heating strategy following discussions with Energetik;* - *Confirmation of the necessary fabric efficiencies to achieve a minimum 15% reduction with SAP2012 carbon factors;* - *Location, specification and efficiency of any ASHPs, if they form part of the revised heating strategy, (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 the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); and how the energy will be used on-site before exporting to the grid;* - *Specification of any additional equipment installed to reduce carbon emissions;* - *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 arrays shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.* *(b) The solar PV arrays air source heat pumps must be installed and brought into use prior to first occupation of the relevant unit. Six months following the first occupation of that unit, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array and heat pump have been installed.*	

Stakeholder	Question/Comment	Response
	c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform. *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.* *<u>DEN Connection</u>* *Prior to the above ground commencement of construction work, details of the pipework location to enable a future DEN connection must be submitted to and approved by the local planning authority.* *Pipework shall be installed from the individual plant rooms to the edge of the site to a single point of connection, with ability to isolate each branch to each unit depending on whether it is connected. This shall include evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.* *<u>Urban Greening Factor</u>* *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 aimed for, ensuring that the landscaping proposals maximise 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.* *<u>BREEAM</u>* *(a) Prior to the above ground commencement, 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*	

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	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) Prior to occupation of the relevant unit, 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.* *<u>Circular Economy</u>* *Prior to the occupation [of any phase / building/ development], a Post-Construction Monitoring Report should be completed in line with the GLA's Circular Economy Statement Guidance.* *The relevant Circular Economy Statement shall be submitted to the GLA at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to the occupation [of any phase / building/ development.* *Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with London Plan (2021) Policies D3, SI2 and SI7, and Local Plan (2017) Policies SP4, SP6, and DM21.* *<u>Whole Life-Cycle Carbon</u>* *Prior to the occupation of each building, the post-construction tab of the GLA's Whole Life Carbon Assessment template should be completed in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning*	

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	submission stage. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the relevant building. *Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.*	
Waste Management	The waste generated from this development will be classed as commercial and as such will not be collected by LBH or its contractors as part of our statutory collection duties. The is acknowledge on page 4 of the Waste Management and Recycling Statement supporting this application which is adequate for a development of this size/type. The site is accessible from Dyson's Road. A basic swept path analysis provided in Appendix 1, pg. 5, shows an RCV being able to turn on site meaning a vehicle can enter and leave in a forward gear. This plan also shows the location of 4 separate bins stores, split 2 at the front of site and 2 at the rear. The number and type of bins needed, and therefore the size of each bin store, is not mentioned within the statement. This will depend on the type of businesses that occupy the development/units in operation, the waste/recycling they generate, and the contracts put in place for the collection of this. The example bin storage units shown in appendix 2 of the statement look to be of a high standard, providing a secure compound and screening bins to improve the site aesthetic and minimise misuse. Commercial waste collection companies can provide up to twice daily collections 7 days per week. We would however advise against sizing the bins stores based on minimum size and maximum collections. The stores should be sufficient to store waste generated from the units in operation for one week.	Comments Noted
Building Control	I have looked at the plans, and fire consultant's report, for the development at the above site and have raised no issues at this stage, except that the rear means of escape routes to be clarified. The proposals will be subject to a full check under the Building Regulations 2010 when an application is submitted to Building Control.	Comments noted.
Flood & Water Management	Having reviewed the applicant's recently submitted : 1) Covering letter confirming response to our drainage comments dated 16th May 2022 2) Greenfield Run-off rate calculations using IH 124 method 3) Micro Drainage outputs for the Drainage Network calculations dated 16th May 2022 4) Propose drainage layout plan reference number 63282 / 101 revision T2	No objection

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	Along with previously submitted Flood Risk Assessment and Drainage Strategy report reference number 63282-01 Revision B dated 10th February 2022 prepared by PRP Environmental Consultant We have no further comments to make on the above planning application.	
Pollution Air Quality	Having considered the submitted supportive information relevant to our aspect of the work i.e. Sustainability and Energy Statement with reference 001077 – PL Version 1 prepared by Sustain Quality Ltd dated March 2022 taken note of the likely use of the most feasible green technologies for the development as Solar Photovoltaic Panels, Design and Access Statement dated July 2022 as well as the fact that one of the site is situated directly adjacent to an electric substation, please be advise that whilst we have no objection to the proposed development in relation to AQ and Land Contamination, the following planning conditions are recommend should planning permission be granted.	Noted conditions attached.
EXTERNAL		
Thames Water	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. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/ working-near-our-pipes 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 /	Noted, informative attached.

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	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. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes Should you require further information please contact Thames Water. 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 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. 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. Water Comments There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working	

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Greater London Authority	**Strategic planning application stage 1 referral** Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008. The proposal Demolition of existing buildings on the site and redevelopment of the land to the west of Willoughby Lane / Dysons Road for the erection of two, two-storey buildings to provide flexible employment space across use classes E (light industrial), B2 and B8 (with ancillary offices), car parking, service yard areas, landscaping and associated works. The applicant The applicant and architect is Michael Sparks Associates. Strategic issues summary Land use principles: The proposed development is acceptable as it would optimise the potential of the site appropriate to this Strategic Industrial Location (SIL), however, further information is required on whether the site is required for waste management purposes and if office uses are ancillary to the functions of the industrial facility. Urban design: No strategic design issues are raised to the development of industrial warehouses on SIL. Transport: Further information is required on Active Travel Zone assessment, car and cycle provision, walking, cycling and public realm improvements, delivery, servicing and	Comments noted and condition attached

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	construction, and travel plans. Sustainable development and environment: Further information is required on energy, circular economy, whole-life cycle carbon, flood risk, drainage, air quality, water efficiency, and noise. Recommendation That Haringey Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 73. Possible remedies set out in this report could address these deficiencies. page 2 Context 1. On 8 April 2022 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make. 2. The application is referable under the following categories of the Schedule to the Order 2008: • Category 3G i Development affecting waste site that does not comply with development plan that occupies more than half a hectare 3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; or allow the Council to determine it itself. 4. The Mayor of London's statement on this case will be made available on the GLA's public register: https://planning.london.gov.uk/pr/s/ Site description 5. The 0.94 hectare site is located on the corner of Brantwood Road and Willoughby Lane. The site forms part of the wider Brantwood Road Industrial Estate, a 16.5 hectare area of land that is in industrial use and designated as Strategic Industrial Land. The site is bounded to the east by Willoughby Lane, to the south by Brantwood, to the north by residential properties, and to the west by industrial properties. The site was used as a vehicle breakers yard and is currently occupied by a 2/3 storey building comprising a total of 2,535 sq.m	

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	(GIA) of retail area and workshops in B2/B8 uses. The remainder of the site is generally hard standing used for storage purposes. The site lies in the Upper Lea Valley Opportunity Area. The site does not contain any statutorily or locally listed buildings nor is it located in a conservation area. 6. The nearest section of the Transport for London Road Network (TLRN) is the A406 North Circular Road, located approximately 1 kilometre north-east of the site. The nearest section of the Strategic Road Network (SRN) is the A1010 High Road, located approximately 900 metres west of the site. The nearest rail station is Meridian Water (Greater Anglia line) which is currently 700 metres to the north-east of the site; however, this distance will reduce to 500 metres with the primary road network delivered with Phase 1 of Meridian Water. Northumberland Park station is also located 750 metres to the south. The nearest bus stops to the site are located within 400 metres to the south of the site on Willoughby Lane (served by bus route 341). Bus access to the local area will also improve with the Meridian Water proposals. As such, the Public page 3 Transport Access Level (PTAL) of the site is estimated to be at least 3 (on a scale of 0-6b where 6b is the highest). Figure 1: Aerial view of the site and surrounds Details of this proposal 7. Demolition of existing buildings on the site and redevelopment of the land to the west of Willoughby Lane / Dysons Road for the erection of modern employment premises to provide flexible employment space across use classes E (light industrial), B2 and B8 (with ancillary offices), car parking, service yard areas, landscaping and associated works. page 4 Figure 2: The site layout plan Case history 8. Pre-application written advice was issued on 27 September 2019 (GLA/5050) for the redevelopment of the site to provide 4,530 sq.m. of industrial floorspace (B2/B8), 3,160 sq.m. of commercial floorspace and 188 residential units. The advice stated that the introduction of a residential use together with vertical co location and the surrounding industrial uses would result in homes of a low quality. The applicant was encouraged to explore opportunities to intensify the site for industrial uses.	

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	Strategic planning issues and relevant policies and guidance 9. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Haringey Strategic Policies DPD (2017), Development Management Policies DPD (2017), Site Allocations DPD (2017) and Tottenham Area Action Plan (2017); and the London Plan 2021. 10. The following are also relevant material considerations: • The National Planning Policy Framework and National Planning Practice Guidance; 11. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows: page 5 • Good Growth - London Plan; • Economic development - London Plan; the Mayor's Economic Development Strategy; Employment Action Plan; • Opportunity Area - London Plan; • Strategic industrial land - London Plan; • Urban design - London Plan; Character and Context SPG; Public London Charter LPG; • Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG • Sustainable development - London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Mayor's Environment Strategy; • Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; • Ambient noise - London Plan; the Mayor's Environment Strategy; • Transport and parking - London Plan; the Mayor's Transport Strategy; • Biodiversity - London Plan; the Mayor's Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG. Land use principles Loss of waste facility 12. Policy SI9 of the London Plan states that existing waste sites should be safeguarded. Any loss of a waste site would only be acceptable where	

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	appropriate compensatory capacity is made that should at least meet or exceed the maximum achievable throughput of the site proposed to be lost. Further, it states that waste plans should be adopted before applications consider the loss of waste sites. A waste site is defined as land with planning permission for a waste use or a permit for waste use from the Environment Agency. 13. The site allocation refers to the site as an existing waste management use with a throughput of 60,000 tonnes of waste per annum. However, the site has not been identified as a safeguarded waste site in the draft North London Waste Plan (NLWP) which is due to be adopted in July. The applicant has stated that the site is not currently in waste use, does not benefit from planning permission for waste purposes, and does not have any waste permits. 14. No evidence has yet been submitted to demonstrate whether there has been any waste throughput in the past five years or whether the loss of waste capacity has been accounted for in the draft NLWP. The Council have advised page 6 that the capacity and throughput on the site have been met at the adjacent Redcorn site. If it can be confirmed that the site does not meet the definition of a waste site (i.e. the site does not have planning permission for the waste use and does not operate with the benefit of a permit for the waste use from the Environment Agency), then officers would be satisfied that there is no conflict with Policy SI9. Therefore, further information on the site history, including evidence of the site not producing waste throughput, or having planning permission or waste permits, should be provided to the GLA prior to Stage 2 referral. Strategic Industrial Location 15. The site is currently designated as part of a Strategic Industrial Location (SIL) in the London Plan. The site also falls within the Lee Valley Opportunity Area, which has an indicative capacity in Policy SD1 of the London Plan for 21,000 new homes and 17,000 new jobs. 16. Policy E4 of the London Plan seeks to ensure a sufficient supply of land and premises to meet current and future demands for industrial and related functions to be provided and maintained. Development proposals in SILs should be supported where the uses proposed fall within the industrial-type activities set out in Part A of Policy E4. 17. Policy E5 of the London Plan states that SIL sites should be managed	

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	proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy. 18. The proposal includes seven new employment units to provide up to 5,592 sq. m. of flexible uses falling within Use Class E (light industrial), B2 (general industrial) and B8 (storage and distribution) with ancillary offices. These uses are acceptable industrial-type activities for the SIL. Given industrial-type floor space is being re-provided at intensified levels, the principle of the loss of the existing industrial units is supported. 19. However, it is noted that office space is not within the list of industrial-type activities unless it is connected to research and development of industrial related products or processes. The submitted plans show the offices on the mezzanine levels above the industrial units. Whilst the office floor space represents a small proportion of the overall floor space on the site, limited information has been provided on what the office space will be used for and appropriate mitigation measures to protect the amenity of office workers from intrusive noises, smells and any other potential nuisances with consideration to agent of change principles contained in Policy D13 of the London Plan. The applicant will need to demonstrate the office uses are ancillary to the functions of the industrial facilities (and not, for instance, let separately to the industrial units), which the Council should secure. Further information should be provided prior to Stage 2 referral. Conditions securing a minimum quantum of floorspace within industrial land uses (Use Classes E(g)(iii), B2 and B8), as opposed to flexible Class E use, should also be considered. page 7 Urban design 20. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment. Figure 3: 3D of proposed development 21. The optimisation of the site for industrial purposes with the erection of two storey industrial buildings, is supported in principle. The Council should ensure	

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	that the impact of the additional massing on the amenity of adjacent residents is appropriate. Additional greening/planting could help mitigate the impact of any new proposal over the existing residential units. 22. The loss of the existing characterful brick building is regrettable, although it is noted that this is not a designated or non-designated heritage asset. The proposed buildings' design and materials are of functional appearance, appropriate to their purpose and the character of the Strategic Industrial Location. Appropriate mitigation measures to reduce noise and light pollution to adjacent residential properties should be considered. Fire safety 23. Policy D12 of the London Plan requires a fire statement prepared by a suitably qualified third-party assessor, demonstrating how the proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. page 8 24. A fire statement has been submitted as part of the planning application, which meets the requirements of Policy D12 of the London Plan. Compliance with the fire statement must be secured by condition. Inclusive access 25. Policy D5 of the London Plan seeks to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). The application material sets out that the development meets the requirements of Policy D5 in that it can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and provides independent access without additional undue effort, separation or special treatment. These measures should be secured by the Council. Sustainable development Be Lean 26. The proposed development is estimated to achieve a reduction of 48 tonnes per annum (41%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development. The applicant should confirm that the GLA Energy Assessment guidance methodology has been followed. Overheating 27. The area weighted average (MJ/m2) and total (MJ/year) cooling demand for the	

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	actual and notional building should be provided and the applicant should demonstrate that the actual building's cooling demand is lower than the notional. Be Clean 28. The applicant has identified the planned interconnected route between Enfield's DEN at Edmonton and Haringey's district heating network within the vicinity of the development and is not proposing to connect to the network. Connection to the network should be prioritised as per the heating hierarchy of London Plan and evidence of active two-way correspondence with the network operator should be provided. This must include confirmation or otherwise from the network operator that the network has the capacity to serve the new development, together with supporting estimates of the CO2 emission factor, installation cost and timescales for connection. 29. The feasibility assessment and calculations referred to by the client should be provided. The applicant has confirmed that the calculations has shown that the warehouse areas have high space heating demand so this load should be connected to the DHN. 30. If possible, the applicant should propose a site-wide heat network supplied by a centralised energy centre. A drawing showing the route of the heat network page 9 linking all buildings/uses on the site should be provided alongside a drawing indicating the floor area, internal layout and location of the energy centre. 31. The applicant should provide a commitment that the development is designed to allow future connection to a district heating network. This should include a single point of connection to the district heating network. Drawings should be provided demonstrating space for heat exchangers in the energy centre, and a safe-guarded pipe route to the site boundary, and sufficient space in cross section for primary district heating pipes where proposed routes are through utility corridors. This requirement is to be secured through a suitable condition or legal wording. Be Green 32. The applicant is proposing to install PV panels. The applicant should provide the capacity (kWp), total net area (m2) and annual output (kWh) of the proposed PV array. A roof layout has been provided, however, it appears that there might be additional space for PV.	

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	33. The applicant should reconsider the PV provision and should provide a further detailed roof layout demonstrating that the roof's potential for a PV installation has been maximised and clearly outlining any constraints to the provision of further PV, such as plant space or solar insolation levels. The applicant is expected to situate PV on any green/brown roof areas using biosolar arrangement and should indicate how PV can be integrated with any amenity areas. 34. The applicant is proposing warm air gas fired condensing heating with destratification fans for the warehouse units, VRF/ VRV (ASHP) system for heating and cooling in the main office areas and direct electric heating to core areas. They also suggest hot water generated by local low storage electric units. They should confirm the reasons why a centralised network served by a more efficient and low carbon heating system i.e. heat pumps was not utilised. Be Seen energy monitoring 35. The applicant has confirmed that the development will be designed to enable post construction monitoring and that the information set out in the 'Be Seen' guidance will be submitted to the GLA's portal at the appropriate reporting stages. This should be secured through the S106 agreement. Carbon savings 36. The applicant should confirm the carbon shortfall in tonnes CO2 and the associated carbon offset payment that will be made to the borough. This should be calculated based on a net-zero carbon target for domestic and non-domestic proposals using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft S106 agreement should be submitted when available to evidence the carbon offset agreement with the borough. page 10 Whole Life-cycle Carbon 37. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint. The applicant should submit a whole life-cycle carbon assessment. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA website1	

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	. Circular Economy 38. Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG. The applicant has is required to submit a Circular Economy Statement in accordance with the GLA guidance. 39. A condition should be secured requiring the applicant to submit a post construction report. The template and suggested condition wording are available on the GLA website2 . Environmental issues Flood risk management 40. The site is located in Flood Zone 2 associated with the Pymmes Brook. A Flood Risk Assessment (FRA) has been submitted as required under the National Planning Policy Framework (NPPF). 41. The FRA provided for the proposed development does not currently comply with Policy SI.12 of the London Plan, as it does not give appropriate regard to fluvial and pluvial flood risk. In terms of fluvial flood risk, the FRA states that the site is at risk of flooding between the 100 year and 1,000 year event. The FRA should include an assessment of the 100 year + climate change flood extents to demonstrate that no floodwater is displaced as a result of the proposals. The FRA should also clearly state the design fluvial flood levels compared with proposed FFLs. The FRA states that the site can be safely evacuated; this should be shown on a plan and consideration should be given for resilience/resistance measures as appropriate. 42. Regarding pluvial flood risk, there is a flood flow path along the southern site boundary on Brantwood Road in the 'medium risk' scenario. The FRA should 1 https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan guidance/whole-life-cycle-carbon-assessments-guidance 2 https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan guidance/circular-economy-statement-guidance page 11 include an assessment of existing and proposed levels to understand the risk to	

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	the site, including appropriate mitigation measures as necessary. 43. Latest EA reservoir mapping shows that the site is at risk of reservoir flooding. Emergency planning measures should be put in place, to be detailed in a Flood Warning and Evacuation Plan (FWEP) secured by condition. Sustainable drainage 44. The surface water drainage strategy for the proposed development does not currently comply with Policy SI.13 of the London Plan, as it does not give appropriate regard to the provision of a sustainable strategy, including greenfield runoff rates, SuDS, and the avoidance/reduction of pumping requirements. 45. The drainage strategy proposes to restrict runoff to 31.5 l/s and 68.5 l/s for the 1 year and 100-year events, respectively, which corresponds to a 50% betterment compared to the existing rate. No assessment of greenfield runoff rate has been made, and no consideration has been given to the practicality of discharging at greenfield rate, or three times greenfield rate, where greenfield runoff rate is not possible. The drainage strategy should be revised to further reduce discharge rates towards the greenfield runoff rate. 46. The drainage strategy proposes to provide all the required attenuation within a below ground attenuation tank. The Applicant should revise the drainage strategy to incorporate a range of SuDS to provide the required water quantity, quality, biodiversity, and amenity benefits. 47. Rainwater harvesting and green roofs should be provided to satisfy the requirements of Policy SI.13. of London Plan. The applicant should ensure that the Council's version of the London Sustainable Drainage Proforma is completed and accompanies the planning application. The proformas for all local authorities can be found here. Water efficiency 48. No information has been provided as to the targeted Wat 01 credits for the non residential uses on site. 49. Water efficient fittings, leak detection systems, water meters, and water harvesting, and re-use should be considered for inclusion to meet the required water efficiency targets. 50. The proposed development does not currently meet the requirements of Policy SI.5 of the London Plan, as no information has been provided regarding the water consumption strategy. page 12	

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	Air quality 51. Given the location of the proposed development in proximity to a number of human health receptors, construction works mitigation relevant to a medium risk site, along with requirements for NRMM to comply with Low Emission Zone standards for the Opportunity Areas, should be secured by condition, in line with London Plan Policy SI1 (D). 52. The offices will be provided with heat and hot water by air-source heat pumps and PV, which will not generate any emissions. The warehouse will, however, be provided with heat by gas boilers, although no assessment of the impacts of emissions has been carried out. Further information is therefore required to determine the significant of any potential air quality impacts. 53. It should be explicitly stated whether there will be any backup generators and, if relevant, an assessment of the impacts of emissions should be undertaken. 54. An Air Quality Neutral assessment was carried out and the development was found to meet the Air Quality Neutral benchmarks for building emissions but exceed the benchmarks for transport emissions. However, the calculation of development trip rate was carried out incorrectly and should only include private car trips in the development trip generation. The assessment should therefore be updated to reflect this (and this may mean that the transport benchmark is met) – further information required to determine compliance with Policy SI1 (B) (2a) of the London Plan. 55. The proposed development is not located within an Air Quality Focus Area and will not introduce any new sensitive receptors to unacceptable air quality conditions – compliant with Policy SI 1 (B) (2d) of the London Plan. 56. Conditions requiring London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards and measures to control emissions during the construction phase are required. Biodiversity 57. Policy G6 of the London Plan states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. 58. As there is currently no soft landscaping on the site, the landscape proposals of species-rich trees and plant beds will help to achieve a Biodiversity Net Gain (stated on page 23 of the Planning Statement, evidenced in a Biodiversity	

Stakeholder	Question/Comment	Response
	Report). It is recommended the applicant should provide quantitative evidence that the proposed development secures a net biodiversity gain in accordance with Policy G6(D). Urban Greening 59. The applicant has calculated the Urban Greening Factor (score) of the proposed development as 0.08. This is a low score, but Policy G5 of the page 13London Plan does not set a target for industrial use, and in recognition of the strategic function of SIL the proposals are accepted in this instance. Transport Pedestrian and cycle access 60. Pedestrian and cycle access to the site is currently combined with the vehicular access points. The applicant should consider whether they can be separated to improve safety. It is however welcomed that pedestrian routes within the site are to be clearly defined and appropriate tactile paving is to be provided at road crossing points. Vehicular access 61. Access will be via priority junction from Dysons Road at the eastern site boundary. This will involve relocating the existing access approximately 15 metres to the north of its current position and will require some changes to existing on-street parking arrangements. It is welcomed that swept paths and Stage 1 Road Safety audit have been included in the submission confirming the safety of the design. Trip generation and mode share 62. A trip generation analysis is provided based on TRICS datasets. It is estimated that the proposal would generate 86 two-way person trips in the AM peak and 52 in the PM peak. Of those, 10 of the peak trips will be by rail, 20 by bus and 38 by car, 7 by bike, and 3 by foot. In terms of vehicular trip impact, the proposal would generate 39 vehicular trips in the AM peak, with a net increase of 11 trips; and 22 vehicular trips in the PM peak, a net decrease of 6 trips compared with the existing use. It is considered that the change in vehicular trips would not have a material capacity impact to the TLRN in the vicinity. Healthy Streets 63. The applicant has not provided an Active Travel Zone (ATZ) assessment, as required by TfL's Transport Assessment Best practice guidance. As such, an ATZ shall be undertaken to assess local walking and cycling conditions within	

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	the defined catchment area and identify improvement opportunities. As the site is located within an industrial area where walking and cycle provision is poor, the Council should secure necessary walking and cycling improvements where appropriate in light of the ATZ outcome, in line with Policy T2 of the London Plan. Cycle parking 64. The applicant is committed to provide one cycle parking space per 250 sq.m. in line with industrial uses as set out in the London Plan with one enlarged space in accordance with the LCDS. While this is welcomed, the applicant shall clearly set out the quantity and types of cycle parking proposed, which shall include the provision of at least 5% of wider spaces. page 14 Car parking 65. The applicant proposes 44 car parking spaces (including 7 disabled spaces), which equates to a ratio of 1 space per 125 sq.m., higher than the London Plan maximum ratio of 1 space per 600 sq.m. for outer London Opportunity areas. The quantum is justified with reference to the census 2011 local mode share for driving to work. The applicant should refer to more recent data sources as vehicle use is likely to be much lower and potentially reducing further with the emergence of a high-density urban quarter to the east. Accordingly, parking should be further reduced to encourage mode shift and contribute to vision zero objective. Nevertheless, it is welcomed that active electric vehicle charging points for 10% of the spaces and 5% of the spaces will be designated for shared car use. 66. A Car Parking Management Plan should be produced, and its final submission and implementation should be secured by condition. Deliveries and servicing 67. An outline Delivery and Servicing Plan (DSP) has been included in the submission, which set out how sustainable freight and servicing will be encouraged and enabled. The final DSP should be secured by condition. Construction 68. It is welcomed that an outline Construction Logistics Plan, which also covers elements for construction logistics have been produced. The final submission and approval of the CLP should nevertheless be conditioned in line with Policy T7 of the London Plan.	

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	Travel Planning 69. A Framework Travel Plan have been provided in line with Policy T3 of the London Plan. The applicant shall commit to provide sufficient resource and funding toward monitoring/ implementing and delivery the targets and measures stated. Nevertheless, the final Travel Plan would need be secured and monitored through the Section 106 agreement as per consented proposal. Local planning authority's position 70. Haringey Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting. Legal considerations 71. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor page 15 again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments. Financial considerations 72. There are no financial considerations at this stage. Conclusion 73. London Plan policies on industrial uses, urban design, transport, environment, and sustainable development are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below: • Land use principles: The proposed development is acceptable as it would optimise the potential of the site appropriate to this Strategic Industrial Location (SIL), however, further information is required on whether the site is required for waste management purposes and if office uses are ancillary to the functions of the industrial facility.	

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	• Urban design: No strategic design issues are raised to the development of industrial warehouses on SIL. • Transport: Further information is required on Active Travel Zone assessment, car and cycle provision, walking, cycling and public realm improvements, delivery, servicing and construction, and travel plans. • Sustainable development and environment: Further information is required on energy, circular economy, whole-life cycle carbon, flood risk,	

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Design Out Crime Office	Re: Planning Application at: 175 Willoughby Lane, N17 0RX Proposal: Demolition of existing buildings on the site and redevelopment of the land to the west of Willoughby Lane / Dysons Road for the erection of modern employment premises to provide flexible employment space across use classes E (light industrial), B2 and B8 (with ancillary offices), car parking, service yard areas, landscaping and associated works. Dear Sarah Madondo, Section 1 - Introduction: Thank you for allowing us to comment on the above planning proposal. With reference the above application we have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1). We haven't met with the project Architects or Agents to discuss Crime Prevention or Secured by Design (SBD) for the overall site. Whilst in principle we have no objections to the site, we have concerns with some aspects of the design that may prevent it from achieving Secured by Design accreditation. However, we believe the development can achieve accreditation providing our recommendations are actioned. We would welcome any opportunity to discuss these with the Architects or Managing Agency. We have recommended the attaching of suitably worded conditions and an informative. The comments made can be easily mitigated early if the Architects or Managing Agency was to discuss this project prior to commencement, throughout its build and by following the advice given. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SbD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to. Section 2 - Secured by Design Conditions and Informative: In light of the information provided, we request the following Conditions and Informative: Conditions: (1) Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained. (2) Accreditation must be achieved according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development. Informative:	Noted condition attached

Historic England	No objection subject to Archaeological Condition(s) I therefore recommend attaching a condition as follows: No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. Informative A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works B. Where appropriate, details of a programme for delivering related positive public benefits. Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. I envisage that the archaeological fieldwork would comprise the following: If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include: This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 205. C.The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI. Evaluation	Comments noted informative attached

NEIGHBOURING PROPETIES	**Design** - Scale/bulk of the building	Officers consider the proposal to be of a compatible and appropriate scale to the context. The proposed development has been reduced scale.
	Impact on neighbours - Loss of sunlight to the garden - Noise pollution - Loss of sunlight into house - Overshadowing - Visual amenity	The proposal is not considered to result in an unacceptable impact on local amenity as set out in the main report.
	Parking, Transport and Highways - Traffic congestion and obstruction - Road safety	The Transportation Officer has assessed these points and which have been covered in the main body of the report; Officers raise no objections to the proposals subject to conditions/S106 being imposed
	Environment and public health - Health benefit/health concerns - Noise and disturbance	Any dust and noise relating to demolition and construction works would be temporary nuisances that are typically controlled by non-planning legislation. Nevertheless, the demolition and construction methodology for the development would be controlled by the imposition of a condition.
	Others - Property devaluation *(officer comment - this is not a material planning consideration).* - Mental health and wellbeing will be affected - Benefits to the local residents - How does the development fit with pandemic/covid lockdown measures *(officer comment - this is not a material planning consideration).*	The proposed development would provide employment for local residents and boost the economy. There is no evidence that proposed development can affect mental health. The proposal includes improvements to surrounding streets.