

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

### **1. APPLICATION DETAILS**

**Reference No:** HGY/2024/1370

**Ward:** Northumberland Park

**Address:** 18 West Road & Unit West Mews, N17

**Proposal:** Redevelopment of 18 West Road and Unit 4 West Mews comprising 2no. warehouses (Use Class B2/B8) with ancillary mezzanine floorspace and associated landscaping, yard, parking, access and infrastructure.

**Applicant:** Valor Park

**Ownership:** Private

**Case Officer Contact:** Sarah Madondo

**Date received:** 14/05/2024

**Last amended date:** 15/08/2024

**1.1** This application has been referred to the Planning Sub-committee for a decision as it is a major application that is also subject to a section 106 agreement.

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

- There is strong policy support for intensification of employment space within a Strategic Industrial Location.
- The proposed development would deliver almost double the quantum of existing floorspace, creating a total 6132 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, making a positive impact on the visual amenity of the area.
- The development would provide a sufficient number of car and cycle parking spaces, would encourage sustainable transport initiatives and include appropriate mitigation measures to minimise impacts upon the public highway.

### **2. RECOMMENDATION**

- 2.1 That the Committee resolve to GRANT planning permission and that the Assistant Director of Planning, Building Standards & Sustainability or the Head of Development Management is authorised to issue the planning permission and impose conditions and informatives subject to the signing of a legal agreement providing the obligations as set out in the Heads of Terms below.
- 2.2 That the legal agreement referred to in resolution (2.1) above is to be completed no later than 9th October 2024 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 shall be granted in accordance with the Planning Application subject to the attachment of the conditions and informatives; and
- 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 and informatives 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, Informatives and Heads of Terms

**Summary of Conditions (the full text of the recommended conditions can be found in Appendix 1 of this report).**

##### **Conditions**

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. Demolition/Construction Environmental Management Plans
7. Waste and recycling
8. CMP
9. Restrictive uses classes
10. Cycle parking Design and Layout
11. Surface Water Drainage
12. Surface Water Drainage Management and maintenance
13. Secure by design accreditation
14. Secure by design certification
15. Energy Strategy

16. Overheating
17. Urban Green factor
18. BREEAM
19. External lighting
20. Boundary treatment
21. Plant Noise
22. Section 278
23. Delivery and Service plan
24. Disabled parking bays
25. Car Parking Maintenance Plan
26. Electric Vehicle charging
27. Hard and soft landscaping works
28. Tree protection
29. Noise Management
30. Noise Management monitoring
31. Living roofs

### **Informatives**

- 1) CIL liable
- 2) Hours of construction
- 3) Party Wall Act
- 4) Street Numbering
- 5) Sprinklers
- 6) Water pressure
- 7) Thames Water Groundwater Risk Management Permit
- 8) Thames Water Underground Asset
- 9) Asbestos
- 10) Secure by design
- 11) Land ownership
- 12) NPPF

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

#### **1. Carbon Mitigation**

- A review of the Energy Strategy by the Owner to be submitted to the Council for approval;
- Energy Plan and Sustainability Review costs;
- Carbon offset contribution mechanism (in case the development is not zero carbon);
- Be Seen energy monitoring requirements.

#### **2. Commercial Travel Plan**

- A travel plan-monitoring fee of £3000 per annum for a period of 5 years.
3. Employment Initiatives – participation and financial contribution towards Local training and Employment Plan.
- Apprenticeship support fees of £1,500
  - 25% of skills training
  - Provide a support fee of £1,500 per apprenticeship towards recruitment costs;
  - 5% of the on-site workforce to be Haringey resident trainees
  - Submission of an employment and skills plan;
  - No less than 20% of local labour. Residents shall be employed for a minimum of 26 weeks
  - One full time apprenticeship per £3mill of development cost (up to max. 10% of total construction workforce
  - Provision of financial contribution £51,643.20 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.
4. Construction logistics and Management Plan
- Provision of financial contribution of £15,000.
5. Highway Improvements
- 278 Highways Works.
6. Active Travel Improvements
- Walking and cycling financial contribution of £25,000.
7. Parking Management contribution
- Upgrading Red-Route CCTV surveillance financial contribution of £40,000.
8. Tree planting
- Contribution of £9000 towards planting of street trees.
9. Monitoring Contribution

- 5% of total value contribution (not including monitoring);
- £500 per non-financial contribution;
- Total monitoring contribution to not exceed £50,000

2.5 In the event that members choose to make a decision contrary to officers' recommendation members will need to state their reasons.

2.6 In the absence of the agreement referred to in resolution (2.1) above not being completed within the time period provided for in resolution (2.3) 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 (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,

(ii) The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and

(iii) The relevant parties shall have previously entered into the agreement contemplated in resolution (1) above to secure the obligations specified therein.

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## **APPENDICES:**

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### 3.0 PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS

#### 3.1 Proposed development

- 3.1.1. This is an application for the demolition of all existing buildings on two separate plots one at 18 West Road (Unit 1) and one at Unit 4 West Mews (Unit 2) and the redevelopment for the erection of modern employment premises to provide flexible 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 more efficient use of the sites by redeveloping them to provide seven commercial units. The height of the buildings range from 12m for (Unit 1) and 10 metres in height for (Unit 2). Unit 1 backs onto residential properties on Willoughby Lane and (Parcel 2) backs onto a small cluster of industrial buildings.
- 3.1.3 The applicant has submitted a separate application for the placement of two new electrical substations associated with the redevelopment of these sites (ref: HGY/2024/1200), which will be determined separately.



Image 1: Aerial view Parcel 1 & 2

#### 3.2 Site and Surroundings



- 3.2.1 The sites are located on the eastern side of West Road; (Unit ) abuts Brantwood Road and currently comprises two buildings/plots, which are at the northern end of West Road. The second, smaller site (Unit 2) is to the south of this and again located on the eastern side of West Road. The sites are within an area designated as a Strategic Industrial Location and within Flood Zone, 2. The site also lies within the Tottenham Area Action Plan. The North London Waste Plan does not safeguard the site as an existing waste management site however; Policy 2 does designate the wider area as a Priority Area for New Waste Management Facilities.
- 3.2.2 The-surrounding area is characterised by industrial and commercial uses. Unit 1 was formerly occupied by Redcorn but is now vacant and Unit 2 (Unit 4 West Mews) was formerly occupied by Michael's Pitta Bread Bakery, however, this company has since gone into administration and ceased trading.
- 3.2.3 Both plots have a public transport accessibility levels (PTAL) value of 2, considered 'poor' access to public transport services. There are two bus services available within 2 to 6 minutes' walk of the site, and Northumberland Park Station is a nine-minute walk away.

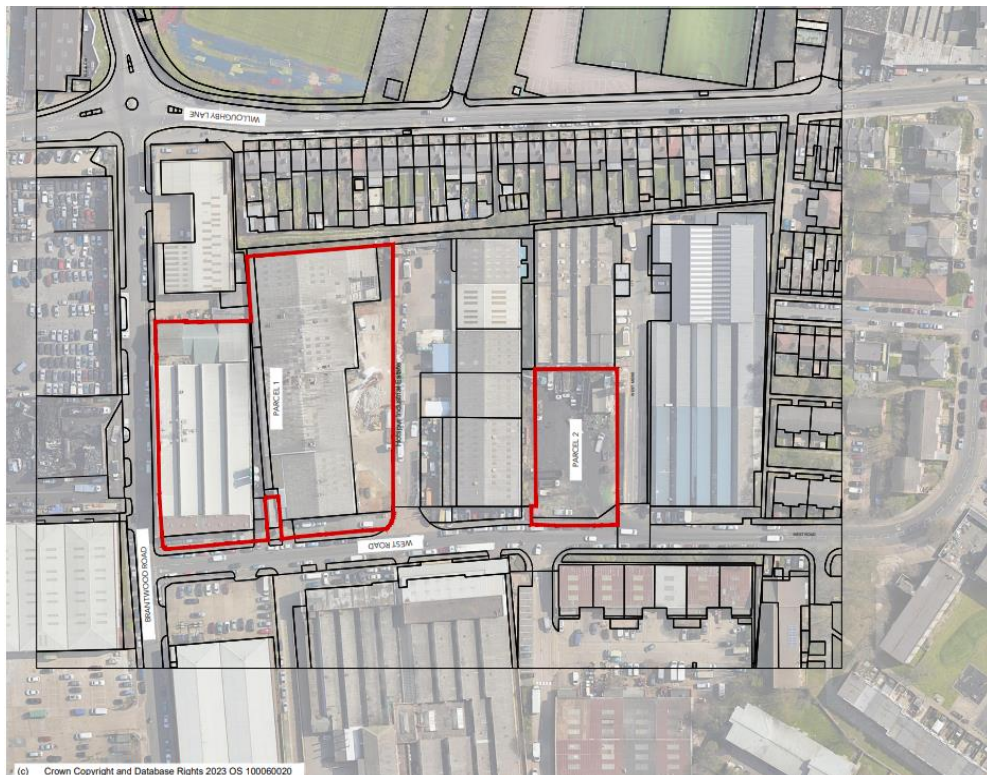


Image 2: Site location Plan

- 3.2.4 The surrounding area is predominantly industrial in character, with some established residential development to the east and a series of sports pitches

beyond. The character of the area becomes predominantly residential approximately 200m to the south. The Hotspur Industrial Estate is located to the west of the site.



Image 3: Birds Eye View of Existing sites and residential properties



Image 4: Aerial View of Strategic Industrial Location (SIL) - Application Sites U1 and U2

### 3.3 Relevant Planning, Enforcement history and Appeals

- 3.3.1 HGY/2023/1211 - Change of use of both sites from bakery (Class B2) to vehicle storage (Class B8), with ancillary office space (Class E). Retention of external improvements including new cladding and the retention of new boundary fence at Unit 1-5. Revised parking layout at both sites. Use of existing mezzanine level for ancillary office space in Units 1 - 5. Extension of the existing mezzanine level to create additional ancillary office space. REFUSED - Application was refused on transportation grounds that is lack of sufficient information on trip generation/movements in connection with the use of site and public safety.
- 3.3.2 HGY/2020/1738 - Retrospective application for change of use from bakery to lorry park and erection of boundary fence. REFUSED – Application was refused on transportation grounds - Insufficient information on trip generation and movements in connection with the use of the site as a lorry park.
- 3.3.3 HGY/2018/2849 - Retrospective application for change of use from bakery to lorry park and erection of boundary fence REFUSED - REFUSED – Application was refused on transportation grounds - Insufficient information on trip generation and movements in connection with the use of the site as a lorry park.
- 3.3.4 HGY/2013/0219 - Alterations to front elevation including new cladding APPROVED.
- 3.3.5 HGY/2012/1937 - Alterations to front elevation including new cladding REFUSED.
- 3.3.6 HGY/2012/1268 - Alterations to front elevation including new cladding REFUSED.

### **3.4 Relevant Enforcement History**

- 3.4.1 BREACH\_UNW/2008/00492 - 18 West Road N17 Unauthorised Works –Closed on 17<sup>th</sup> November 2008 – Complaint closed as matter was resolved by the submission of planning application was granted under reference HGY/2008/1317.3.4.2 UNW/2008/00492 - 18 West Road N17 Unauthorised Works - Closed. Closed on 17<sup>th</sup> November 2008 – Complaint closed as matter was resolved by the submission of planning application was granted under reference HGY/2008/1317.
- 3.4.3 COU/2019/00096 - Unit 4 West Road Change of Use - Closed 08/12/2022 Breach Resolved - Applicant complied with enforcement notice following dismissal of an appeal reference APP/Y5420/C/21/3286295.

### **Appeals**

- 3.4.4 APP/Y5420/C/21/3275288 Unit 4, West Mews, Unit 4, West Road, London, N17 Change of use of the site from a bakery (Class B2) to a lorry park (sui generis), which included the erection of a boundary fence Enforcement Notice Served Date Served: 15/04/2021 – Appeal Dismissed 04/05/2022



- 3.4.5 APP/Y5420/W/21/3274926 Unit 4, West Mews, London, N17 0QT  
Retrospective application for change of use from bakery to lorry park and erection of a boundary fence. Appeal Partly Allowed 01/11/2021
- 3.4.6 APP/Y5420/C/21/3286295 Unit 4, West Mews, West Road N17 Change of use of the land to motor vehicle parking, vehicle repairs, storage of motor vehicles parts, siting of caravan and shipping container and erection of a shed. Appeal Dismissed 04/05/2022

## **4.0 CONSULTATION RESPONSES**

### **4.1 Quality Review Panel**

- 4.2.1 The scheme has been presented to Haringey's Quality Review panel on two occasions.
- 4.2.2 Following the second Quality Review Panel meeting 6<sup>th</sup> March 2024, Appendix 2, the Panel offered their 'support' for the scheme, with the summary from the report below:

*The QRP commented positively on the principle of the development, praising the contribution the proposed development would make to improving the industrial offer of the area as a marker for future development. The overall design approach was also supported by the QRP, stating that a simplified elevation treatment was suitable for this type of development. The panel have suggested that applicant reviews the height of unit one as this appears overbearing in relation to the residents of Willoughby Lane. The applicant should review the opportunity to consolidate and relocate the substations. Furthermore, explore a simplified façade options, including an alternative corner design approach for Unit 2 and alternative elevation treatments for the eastern elevation of Unit 1. The panel recommends that significant landscaping improvements should be incorporated, including greenery to the security fence line for Unit 1, provision of external occupier amenity space, public realm enhancements to the northern yard frontage for Unit 1 by moving the building south, clearer landscaped boundaries and features to create a clear pedestrian entrance for Unit 1. The Applicant to include full details of the sustainability measures within the main application, including the PV quantum.*

### **4.3 Application Consultation**

- 4.3.1 The following were consulted regarding the application:

(Comments are in summary - full comments from consultees are included in appendix 3)

**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 objection
- 8) LBH Arboriculturist Officer: No objection, subject to conditions
- 9) LBH Lighting: No objection, subject to condition
- 10) LBH Noise: No objection, subject to conditions.
- 11) LBH Inclusive Economy: No objection

## **EXTERNAL**

- 12) Thames Water: No objection, subject to informative/s regarding sequential approach, sewers, groundwater discharge etc.
- 13) London Fire Brigade: No objection
- 14) Designing Out of Crime: No objection subject to conditions
- 15) Transport for London: No objection

## **5.0 LOCAL REPRESENTATIONS**

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

#### Neighbouring properties:

Site notices were erected in the vicinity of the site.

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

No of individual responses: 1

Objecting: 1

Supporting: 0

- 5.3 The issues raised in representations that are material to the determination of the application are set out in Appendix 3 and summarised as follows:

**Impact on neighbours**

- Overlooking back garden
- Loss of privacy
- Loss of light
- Noise and disturbances

**Character and appearance**

- Impact on character and appearance of area

**Parking, Transport & Highways**

- Parking due to increase in vehicles
- HGVs lorries causing damages on Brantwood Road

**Environment and Public Health**

- Noise and disturbance

- 5.4 The following issues raised are not material planning considerations:

**6.0 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, Trees, Ecology and Biodiversity;
6. Flood Risk and Drainage;
7. Air Quality and Land Contamination;
8. Impact on the amenity of adjoining occupiers;
9. Waste and recycling;
10. Fire Safety;
11. Employment.

## **6.1 Principle of the development**

- 6.2.1 The site is designated as a Strategic Industrial Location (SIL) (DEA1 which safeguards the land for a range of industrial use classes ranging from Class E(g) (Commercial Business and Service – formerly Class B1), Class B2 (General Industrial) and Class B8 (Distribution or Storage).
- 6.2.2 The National Planning Policy Framework (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 policies to minimise travel to work;
- Support small and medium sized businesses that need employment land and space; and
- Contribute to the need for a diverse north London and London economy including the need to promote industry in general in the Upper Lea Valley and in particular, promote modern manufacturing, business innovation, green/waste industries, transport, distribution and logistics.

6.2.6 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 purposes including improvements in the quality/type of employment space, quality/density of jobs on-site and 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. 6132 sqm; Therefore, the site would provide enhanced employment use and economic benefits particularly in terms of securing a modern, viable use of the site and contribute towards policy objectives for



accommodating industrial land and supporting economic growth. The proposal is therefore strongly supported by National, Regional and Local Policy.

- 6.2.9 The site is used to process waste and the North London Waste Plan does not safeguard it as an existing waste management site. However, Policy 2 does designate the wider area as a Priority Area for New Waste Management Facilities. This notes the site to be suitable for Waste uses but does not compel them to be retained or provided. Therefore, the proposal is in accordance with the North London Waste Plan and is acceptable in this respect.

### **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 Council's design officer has reviewed the proposed development and notes that in design terms, the scheme would be consistent with the urban design principles exemplified by the wider context of Industrial Estate. The wider SIL industrial area is characterised by low-rise warehousing units of similar footprint, character and scale. Furthermore, the proposed development responds to the prevailing building pattern in terms of scale and massing. The proposal is for modern buildings in order to provide energy efficient and visually appealing buildings compared to the existing warehouse buildings.
- 6.3.3 The design officer notes that the design and layout of the buildings would achieve an attractive building form that makes use of high quality and durable materials. The choice of materials were also supported by the QRP, who considered the proposed development to be simple clean architecture.
- 6.3.4 The buildings are designed to create a strong visual focus with the corner glazing feature of the office component in particular providing a strong visual emphasis. The size and massing of the proposed development is considered to be respectful of surrounding buildings. The office pods have been designed to enhance the architecture with use of detailing, use of curtain walling and a portico to clearly define entrances. Glazing will be provided to all floors of the offices. The building entrances will be highlighted with full height curtain walling, emphasising the main

entrance to the building. In terms of the proposed materials and associated detailing, this is consistent across both parcels to create a visually united scheme.

- 6.3.5 The design officer notes that the height of Unit 1 has been reduced by removing of parapets and the proposed development would be comparable with the massing of other warehousing buildings within the existing context. This also addresses the concerns raised by QRP.



Image 5: Elevations

- 6.3.6 The proposal would incorporate Paladin fence appropriately 2.4 metres in height with sliding gates along Brantwood Road and the details would be secured via a condition.
- 6.3.7 In term of amenity space Unit 1 has been designed with a balcony that is accessed via the main office. The balcony area will include seating areas with low level planting to provide an external amenity area to be used by staff members. The materials would be secured via a condition.
- 6.3.8 The design officer concludes that the proposals are acceptable in design terms for a location with low sensitivity and already with significant height, bulk and mass, trending in the direction of being further redeveloped at similar heights, and with much greater height not far away.
- 6.3.9 A condition will require approval of all external materials and restrict the addition of rainwater goods to the building elevations.

6.3.10 The existing site has a very low landscape value, with the vast majority of both unit 1 and 2 comprising of hardstanding or built form. As per QRP and pre application advice, the applicant has improved the landscaping of the proposed development by incorporating significant tree planting and greening of the unit boundaries. With a particular focus on the West Road and Brantwood Road corner and the eastern boundary of Unit 1, to create a more attractive street frontage and outlook for the residential properties.. The detail will be secured by condition. Comments in relation to the boundary treatment are noted and a condition is included to ensure the final boundary treatment is approved prior to occupation of the development.

6.3.11 Overall officers, consider that the proposals are acceptable in design terms for a location with low sensitivity and already with significant height, bulk and mass, trending in the direction of being further redeveloped at similar heights. This development would have a striking and functional appearance, compatible with its location.



Image 6: Appearance of buildings & materials.

#### *Quality Review Panel (QRP) Comments:*

6.3.12 The full Quality Review Panel (QRP) report of the review on 6<sup>th</sup> March 2024 is attached in Appendix 4. A summary of the Quality Review Panel's comments is provided below:

*The QRP commented positively on the principle of the development, praising the contribution the proposed development would make to improving the industrial offer of the area as a marker for future development. The overall design approach was also supported by the QRP, stating that a simplified elevation treatment was suitable for this type of development. The panel have suggested that applicant reviews the height of unit one as this appears overbearing in relation to the residents of Willoughby Lane. The applicant should review the opportunity to consolidate and relocate the substations. Furthermore, explore a simplified façade option, including an alternative corner design approach for Unit 2 and alternative elevation treatments for the eastern elevation of Unit 1. The panel recommends that significant landscaping improvements should be incorporated, including greenery to the security fence line for Unit 1, provision of external occupier amenity space, public realm enhancements to the northern yard frontage for Unit 1 by moving the building south, clearer landscaped boundaries and features to create a clear pedestrian entrance for Unit 1. The Applicant to include full details of the sustainability measures within the main application, including the PV quantum.*

6.3.13 Detailed QRP comments from the most recent review together with the officer comments are set out below in Table 1.

Table 1

Panel Comment	Officer Response
<b>Height and massing</b>	
<p>The massing developed for both units is appropriate for industrial use, but the panel is concerned that the height of Unit One will have an overbearing impact on houses in Willoughby Lane, backing onto the eastern edge of the site.</p> <p>The panel understands that the scheme currently passes the Building Research Establishment's minimum sunlight requirements and is a reasonable distance away from neighbouring houses. However, this proposal will be double the height of the existing building, and is therefore likely to block the evening light that the back gardens currently receive for some of the year. It will also not improve the residents' outlook by extending the area of blank façade they will see.</p> <p>From the perspective of being a good neighbour, the panel strongly encourages the project team to scrutinise cross sections through Unit One and the houses on Willoughby Lane. It asks that the roof of Unit One is lowered to ameliorate the impact on these residents, and that the views from resident gardens are also checked</p> <p><u>Architecture</u></p> <p>In the panel's view, it is preferable to employ a clean, simple architectural approach, using steel cladding, and to focus on the quality of the detailing rather than adding extra materials such as brick. It also notes that the more complex</p>	<p>QRP comments noted. In response to QRP comments, the parapets were removed from the buildings, resulting in a 2m reduction in heights on the boundary with properties on Willoughby Lane.</p> <p>QRP comments noted. As stated above there is reduction in height, and the DLSL report submitted confirms 100% pass rate in gardens. The outlook has been improved since the QRP meeting, with 9 trees proposed along the eastern boundary, resulting a net benefit in terms of visual impacts.</p> <p>Comments noted. The height of unit 1 has been reduced by the removal of parapets, with cross sections provided by the Applicant.</p> <p>QRP comment noted. This was the preference of the applicant and was consistent with the design approach presented to QRP. The design has been refined positively since QRP to continue to use high-quality cladding treatments</p>

<p>the building, the harder it will be to maintain or adapt for future needs.</p> <p>The façade of Unit One included a glazed corner in response to the cut-out corner of the floorplan and the corner of West Mews and West Road, but this detailing is repeated in Unit Two, where there is no cut-out or street corner. The panel suggests that the two warehouses should be treated differently in response to the slight variations in their settings.</p> <p>The panel also favours a simple approach rather than using colour to break up the massing. It suggests that there is a designated, protected space for integrated signage on the façades.</p> <p><b>Industrial workspace design</b></p> <p>The site layout of Unit One is logical, as it allows heavy goods vehicles to turn off Brantwood Road into the yard. The site layout of Unit Two, on a more constrained site, is also sensible. However, with both units there are some opportunities for enhancement.</p> <p>The health and wellbeing of employees should be properly accommodated. It is predicted that approximately 80 employees will work across the two sites. In the panel's view, a more meaningful effort should be made to provide a</p>	<p>that are easily adaptable, to deliver two exemplar buildings.</p> <p>QRP comment noted. The level of glazing has been reduced to the respond to the comments, however some corner glazing has been retained to allow sufficient daylight levels to the office meeting room areas.</p> <p>QRP comment noted. The cladding approach has been simplified with a colour palette of greens, greys and whites chosen to ensure a clean finish, as shown in the submitted CGIs. It was not deemed appropriate to provide protected spaces, for signage to ensure maximum flexibility. The location of signage will be determined through a separate advertisement consent application depending on final occupier needs (as is standard practice).</p> <p>QRP comments noted, however comments from Haringey highways has resulted in amending the access for Plot 1 to be from West Road.</p> <p>QRP comments noted. Additional amenity and landscaping have now been included on the scheme; this also includes a first floor accessible balcony providing amenity for users of Unit 1, and 3 benches provided within the</p>
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<p>pleasant space for them to take breaks outside.</p> <p>Some commercial space would need to be sacrificed to make space for more landscaping, but this could be regained by extending the mezzanine levels internally. The panel notes that online retailer, online supermarket, or third-party logistics tenants have an increasing need for ancillary office space, which could be provided in such upper mezzanine levels.</p> <p>Alternatively, the mezzanines could extend further, over part of the yards. If adequate security arrangements can be made for undercroft parking to work, the panel encourages the project team to test this model.</p>	<p>landscaping at ground floor level for Unit 2.</p> <p>QRP comments noted. Both units provide sufficient mezzanine for anticipated users, with buildings future proofed to enable further mezzanine to be installed in the future should it be required.</p> <p>QRP comment noted. The applicant has designed the units to have flexibility within the internal layouts, which will enable a wide range of potential customers to occupy the units.</p>
<p><b>Sustainability</b></p> <p>The panel agrees that high-quality design ensures longevity and is part of a good sustainability strategy. To go beyond sustainability and achieve a regenerative design, more should be on offer in terms of social value, biodiversity, health and wellbeing.</p> <p>The panel suggest that the project team should continue to develop the scheme to reduce carbon. Choices should be informed by materials and components that are easy to adapt or disassemble, for example, the mezzanine structures should be designed for future extension.</p> <p>The panel feels the existing materials on the two sites should be reused where possible. Larger steels may not be in a suitable condition for reuse as they are, but could be cut down and used for shorter spans elsewhere.</p>	<p>QRP comment noted. The applicant will be using durable materials as indicated in the Design and Access statement.</p> <p>QRP comment noted. The development achieves a reduction of 112% carbon dioxide emissions on site.</p> <p>QRP comments noted. The existing materials onsite will be reused as far as possible, as set out in the Site Waste Management Plan – Construction and Demolition.</p>

<p>The panel is pleased to hear that sedum roofs have been ruled out due to fire safety concerns, as the species are frequently not native to the UK. However, it encourages the project team to investigate green roofs wherever possible. These can create an ecologically rich surface that works in combination with solar panels, helping to mitigate the urban heat island effect, and adding a layer of insulation. The panel understands the insurance challenges, but notes that this would also reduce reliance on mechanical systems to maintain a comfortable internal environment.</p> <p>The panel feels that project team should also explore the use of lightweight green roof products that can create an insulating, wet roof wildflower meadow, and so do not pose a fire risk.</p>	<p>QRP comments noted. Green roofs are provided on all bicycle shelters.</p> <p>QRP comment noted. This was explored by the applicant on the warehouse buildings but was not considered appropriate.</p>
<p><b>Landscape and biodiversity</b></p> <p>The panel advises the newly-appointed landscape architect to interrogate the proposals as soon as possible, to test whether the landscape designs can be delivered.</p> <p>The panel asks for a more meaningful landscape offer along the street frontages, providing green spaces for employees and contributing to the public realm. This may require some sacrifice or reconfiguration of commercial yard or floorspace, but it would make a significant difference to the streetscape in a hard, urban environment.</p>	<p>QRP comment noted. The applicant has taken the opportunity to improve the landscape value of the site by incorporating significant tree planting and greening of the parcel boundaries, with a particular focus on the West Road and Brantwood Road corner and the eastern boundary of Unit 1, to create a more attractive street frontage and outlook for the residential properties.</p> <p>QRP comment noted. As stated above landscape value of site has been improved along West Road and Brantwood Road consisting of tree planting and new green hedge is proposed around the buildings utilising mixed species hedges, a range of</p>



<p>The panel's advises that it's not sufficient to target ten per cent biodiversity net gain when the site is starting from zero. These sites should offer substantial planted zones, including trees, which could be used to mark entrance routes. This would soften the arrival experience, and bring more biodiversity and delight to the proposals.</p> <p>The project team should put more thought into how the landscaping will be maintained, providing a maintenance plans. Solutions could include ideas such as low brick walls, to prevent rubbish from drifting into the planting, reducing the maintenance workload.</p>	<p>shrubs and herbaceous plants to create an attractive frontage.</p> <p>QRP comment noted. The submitted plans indicates that 18 trees would be planted. Trees would be planted at entry points of Unit 1 &amp; 2 as indicated on landscaping plans.</p> <p>QRP comment noted. The applicant submits that the first 12 months the planting maintenance will be responsibility of the landscape sub-contractor and then the responsibility of the maintenance will be borne by an appointed management company.</p>
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Image 7: CGI: West Road

## 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 has a PTAL value of 2, considered 'poor' access to public transport services. There are two bus services available within 2 to 6 minutes' walk of the site, and Northumberland Park Station is a nine-minute walk away. The site is also located within the Tottenham Event Day CPZ, which operates on match and event days and evenings at the Tottenham Hotspur Stadium. Most of the time, there are no active CPZ restrictions/measures in place.
- 6.4.3 In regard to parking and highway safety, the applicant has submitted a transport assessment, which has been assessed by transportation officers. The site would be accessed via Brantwood Road and West Road.

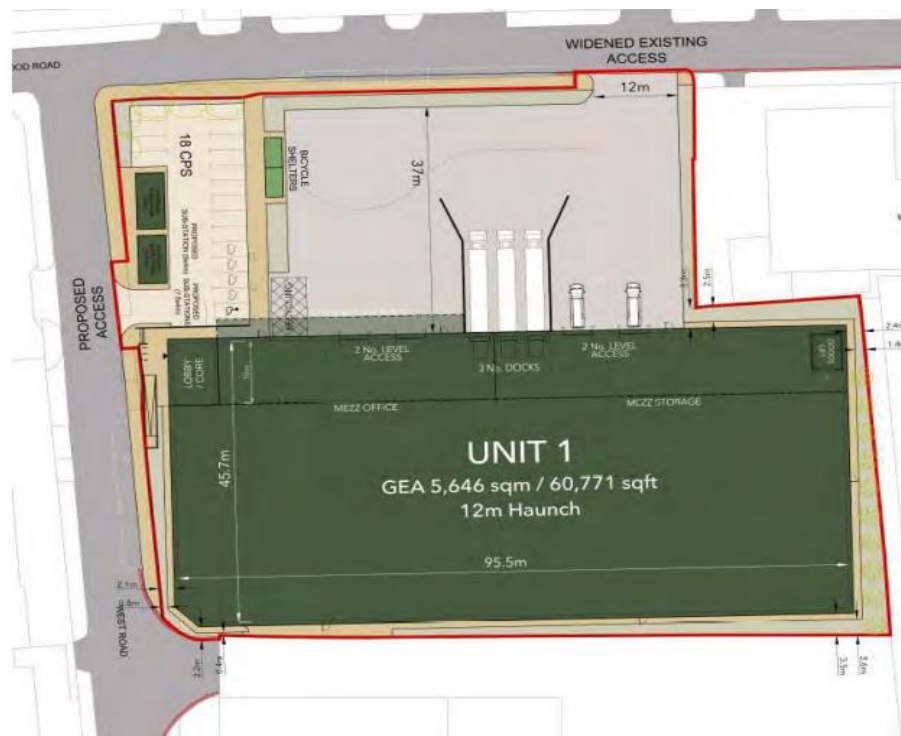


Image 8: Proposed access for Unit 1

- 6.4.4 The transportation statement states the existing eastern access on Brantwood Road will be modified to facilitate access to the loading yard, and an access on West Road would be modified to facilitate access to the car park. With Unit 2, the access would be on West Road and will be modified to facilitate access to the yard/car parking.

- 6.4.5 Any highway works associated with the removal of access/crossover changes, would result in an improvement in environment of the area. A Section 278 Agreement under the Highways Act will be required to cover the design and implementation of the highway works. This would be secured via s106.
- 6.4.6 The Transport Assessment (TA) includes a Healthy streets assessment (HAS), which indicate that there is 6 different routes to and from site. The findings of the assessment revealed that there are gaps in tactile paving provision at a number of the pedestrian crossings that would be used by pedestrians to walk to and from the sites. To improve the walking and cycling environment a s106 contribution would be required for improvements to the conditions for active and sustainable modes of accessing the site.
- 6.4.7 In terms of parking, there is currently no formal car parking on Unit 1 or 2 albeit the hardstanding in front of both sites has been used for parking cars. The transport statement states that the proposal includes parking as follows:
- Unit 1 will have parking space for 26 cars in total which would include 1 reserved for Blue Badge holders and 4 spaces for Electrical Vehicle Charging facilities; and
  - Unit 2 will have parking space for 6 cars in total which would include 1 reserved for Blue Badge holders and 2 spaces for Electrical Vehicle Charging facilities.
- 6.4.8 The transportation officer's considers that the number of parking spaces to be appropriate and would comply with London Plan policies. A parking management plan would be secured via s106 agreement and tied in with monitoring of the Travel Plan to ensure a decrease in demand over the monitoring period thereby minimising the demand for on-street parking.
- 6.4.9 The Council's parking team have implemented 'Red Route' arrangements at the site to assist in managing parking issues taking place in the locality. Given the history of traffic management and parking issues in the locality of this site, particularly within Brantwood Road and West Road, which resulted in Haringey Council implementing 'Red Route' arrangements along Brantwood Road between Tarriff Road and Willoughby Lane, and along the entire length of West Road. These roads would be used quite regularly to access this development and these measures have been introduced to attempt to address the multiple problems experienced by occupiers and highway users, in particular regarding highway safety and difficulties with loading. Notwithstanding this, there are still issues being reported and a high level of non-compliance taking place, necessitating a high profile for enforcement officers on the ground and CCTV surveillance.
- 6.4.10 Thus said, it is considered a parking management contribution would be appropriate to ensure enforcement/management of parking, loading and operation of the public highway along West Road/Brantwood Road. The parking

management contribution would go towards improving the effectiveness of CCTV surveillance, enforcement, costs to alter, amend, expand traffic regulation orders, manage parking and loading aspects and highway safety. As such, the contribution would be secured via S106 contribution.

- 6.4.11 In regards to the operation parking, a Framework Delivery Management Plan has been submitted along with the application setting out how deliveries associated with the two units would be managed. The applicant would be required to submit a detailed delivery and servicing plan, which indicates how all the Long Goods Vehicles (LGVs) would be accommodated outside the proposed marked bays. To address this, transportation officers considers that a condition should be attached.
- 6.4.12 In terms of cycle parking the statement indicates that provision of 40 spaces for plot 1 (34 long stay and 6 short stay) and 18 for plot 2 (12 long stay and 6 short stay) would be provided. External secure cycle parking is proposed using a double stacking system within a secure shelter and Sheffield stands for visitor cycle parking, and there is reference to provision of lockers and showers internally. The transportation officer notes that the long-stay and short- stay cycle parking and access arrangements would be secured by planning condition.
- 6.4.13 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 (CLP) is included and S106 obligation to cover the cost of monitoring this CLP.
- 6.4.14 Subject to the conditions and obligations indicated, 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.

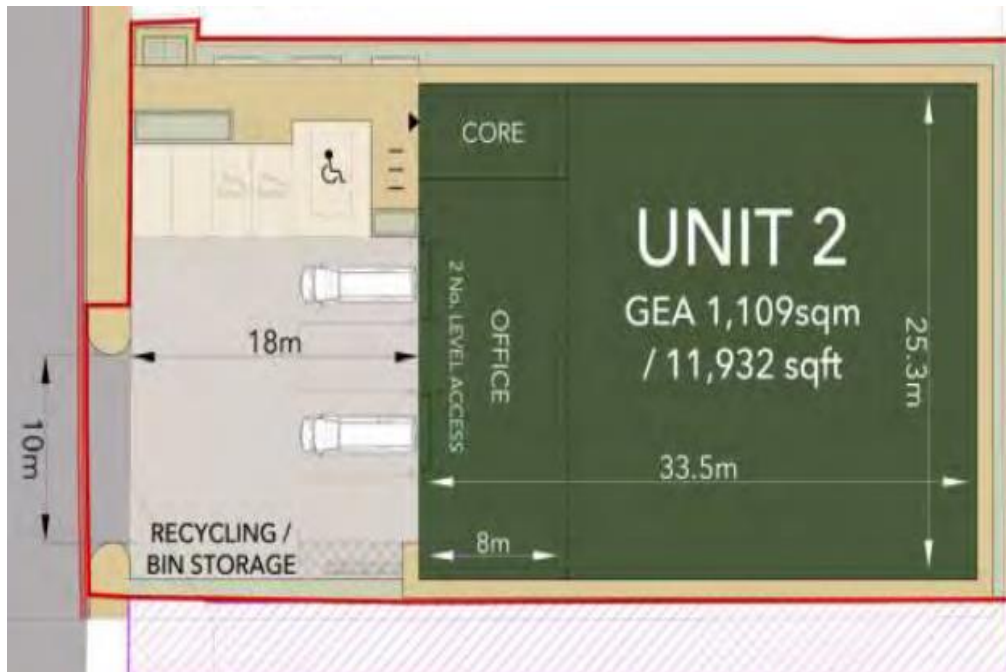


Image 9: Proposed Access for Unit 2

## 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 applicant submitted an Energy & Sustainability Statement, which was reviewed by Climate Change Officer. They note that the development achieves a reduction of 122% carbon dioxide emissions on site, which is supported in principle. The development is proposing living roofs on top of the bike storage sheds, solar photovoltaic panels and air heat pumps. LBH Carbon Management raises no objections to the proposal subject to some clarifications with regards to the energy and overheating strategies which can be dealt with via condition.
- 6.5.4 The applicant has prepared a BREEAM Pre-Assessment (Shell and Core) Report. Based on this report, a score of 76.60% is expected to be achieved, equivalent to 'Excellent' rating. A potential score of 88.43 % could be achieved which delivers an 'outstanding' rating with a 3.43% margin of contingency over the 85% target for an Outstanding BREEAM rating. Subject to a condition.

- 6.5.5 The applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 Heathrow weather files. The report has modelled offices spaces in both units based on the scenarios with 1) active cooling and 2) passive measures and openable windows only. A revised overheating strategy is required and this would be secured via a condition.
- 6.5.6 The proposal satisfies development plan policies and the Council's Climate Change Officer supports this application subject to the conditions and obligations. As such, the application is considered acceptable in terms of its sustainability.

## **6.6 Urban Greening, Trees and Ecology/Biodiversity**

- 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 compared to the existing arrangement which provides virtually no greening. The Urban Greening Factor for the development has been calculated as 0.07 for unit 1 and 0.05 for unit 2, 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 but measures have been taken to significantly enhance greening on the site.

- 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.

### **Trees**

- 6.6.7 The boundary planting is formed by beech hedges, a range of shrubs and herbaceous plants to create an attractive development. Along the eastern perimeter, tall, narrow elm trees are proposed to soften views of the façade from neighbouring residential properties. The proposal includes the planting of:
- 4x trees on the corner and 10x trees on eastern boundary a total of (14) trees for unit 1.
  - 4x trees by the entrance (4) of unit 2
- 6.6.8 There is only one existing Category C tree on site at the eastern boundary, which is proposed to be removed. The Tree Survey indicates the other nearby trees are to be protected throughout construction. The applicant has agreed to contribute towards street trees and this would be secured via s106.
- 6.6.9 The Council's Tree Officer has been consulted on the proposal and is supportive of the proposed species of trees and comprehensive landscaped design, which enhances tree cover in the area.
- 6.6.10 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.
- 6.6.11 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**



- 6.6.12 Policy G6 of the London Plan requires development proposals to manage impacts on biodiversity and aim to secure net biodiversity gain.
- 6.6.13 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.
- 6.6.14 The applicant has submitted an Ecological Impact Assessment, in support of this application. The report confirms that the existing habitat value of the site is low, with both unit 1 and 2 offering limited opportunity for any protected species. Given that the EclA concludes that the proposed development would not impact any priority habitat and that there is no continuous on-site habitat, the site is exempt from the 10% BNG requirement. Notwithstanding this, the proposed landscape enhancements will still result in a considerable increase in BNG due to the low value of the existing site.
- 6.6.15 In addition, 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. As stated above the existing site has a negligible amount of soft landscaping and the proposals will introduce more greenery/planting and secure a biodiversity net gain in respect of both habitat and hedgerow units.
- 6.6.16 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 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, or more, permeable 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 impact assessment on surrounding properties

- 6.9.3 The applicant has submitted a daylight and sunlight assessment of the effect of the proposed development upon the existing surrounding properties. The windows of the following properties were assessed; 135 to 165 Willoughby Lane. All 85 windows assessed (100%) will meet and exceed the target values as set out in the Building Research Establishment (BRE) guidelines. Of the 43 rooms assessed, all but one (98%) will meet and exceed the target values as set out in the BRE guidelines. The room in question is located within 151 Willoughby Lane and retains a target value of 0.75, which is marginally below the 0.8 target value recommended in the BRE guidelines.
- 6.9.4 The BRE guide acknowledges and accepts that some reductions in light will occur when development takes place, and the assessments allow for a reduction of up to 20% of the existing light levels (or 0.8 times their former value) before any effect is considered an impact. The guide states that the numerical guidelines should be applied sensibly and flexibly. Considering the result to the single room at 151

Willoughby Lane is the only room that falls short of the targets (and marginally so), the overall effect of the proposed development is not considered to be material.

#### Sunlight impact assessment

- 6.9.5 The assessment indicates that 42 rooms will meet the BRE's numerical targets for sunlight. One room on the ground floor of 153 Willoughby Lane retains 0.79 times its existing value, against the BRE's guideline target of 0.8 times. The room will retain 22% Annual Probable Sun Hours (APSH) against a target of 25%, which is marginally below the BRE's numerical target. It is also noted that the adjacent building at 151 Willoughby Lane has a rear projection at ground floor, which limits the availability of direct sunlight to the window at 153 Willoughby Lane. Overall, the effect is not considered to be material and the room will retain the majority of the current levels of sunlight.

#### Overshadowing

- 6.9.6 The report indicates that 16 gardens and amenity spaces surrounding the site were assessed. The results indicate that all garden areas assessed (100%) will significantly exceed the BRE target criteria for sunlight, because at least 50% of its area receives at least two hours of direct sunlight on 21 March. In this case, the ground area of the garden reached by direct sunlight is virtually unchanged.

#### Privacy/Overlooking and outlook

- 6.9.7 The submitted plans demonstrate that there will be no windows at the eastern elevation of both Unit 1 and Unit 2; therefore, the proposal will not result in any overlooking impacts nor loss of privacy to the properties along Willoughby Lane.
- 6.9.8 Following the advice from QRP the applicant has amended unit 1 such that the parapets have been removed, resulting in a 2m reduction in heights on that boundary with properties on Willoughby Lane. This reduces the visual impact of the unit, which combined with the high quality façade, will provide a significantly more aesthetically pleasing outlook than the existing materials. The proposal includes the planting 10 trees along rear elevation to add increased visual interest and improve the overall outlook of these residents. As such, it is considered that the outlook for these properties would not be significantly impacted, rather would be visually pleasing.
- 6.9.9 Furthermore, the site would be bounded by Paladin fence approximately 2.4-metre-high along the boundary with residential properties on Willoughby Lane, which would provide some screening and the materials of the fence would be conditioned. 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

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

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

6.9.12 Furthermore, the applicant has submitted an environmental noise report, which assessed the following activities:

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

6.9.13 The Baseline Conditions Assessment in the report concludes that the existing noise conditions range between 55dB Equivalent Continuous Sound Pressure Level (LAeq) during the day and 49 dB LAeq during the night. The Operational Noise Assessment concludes that the Specific Sound Levels of the Proposed Development will range between 38 dB LAeq during the day and 33 dB LAeq during the night. As such, the criterion of at least 5dB below background sound level will be readily achievable at the identified Noise Sensitive Receptor Groups ('NSRG').

6.9.14 In terms of noise break-out from units, the reports states that the layout of the site and units incorporates 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 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.

6.9.15 In regard to noise from mechanical service plant, the report states that the 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.

6.9.16 The overall height of Unit 1 was concern for the officers and the QRP with respect to its potential impact on the backs of houses on Willoughby Lane. However, officers note that the proposal is not right up against the boundary as there is an existing gap and naturally overgrown vegetation. The total distances from the back of the houses to the back of the proposed Unit 1 would be proximately 32.826m (Willoughby Lane being slightly angled away so houses backing on to the north-

east corner will be closest), with 20.56m being the back garden of the houses themselves. In addition, the parapets of Unit 1 has been removed, thereby reducing the height of this building. Therefore, it is considered that proposed development would not have a significant impact on the residentially properties on Willoughby Lane.

6.9.17 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.

6.9.18 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 and Training**

6.11.1 Local Plan Policies SP8 and SP9 aim to support local employment and facilitate training opportunities. The Planning Obligations SPD also requires the developer (and its contractors and sub-contractors) to notify the Council of job vacancies, and to employ a minimum of 20% of the on-site workforce from local residents (including trainees nominated by the Council).

6.11.2 The applicant has indicated that the development would provide 6312 sqm of employment floor space for flexible E, B2 and B8 use. The proposed development would increase the number of jobs to approximately 133 full time equivalent (FTE) jobs and the addition of ancillary mezzanine would allow additional flexibility to increase floor space thereby significantly increasing the job opportunities in the local area.

6.11.3 An employment skills and training plan, which is recommended to be secured by a s106 planning obligation, would ensure a target percentage of local labour is utilised during construction and a financial contribution towards apprenticeships.

This would benefit priority groups that have trouble in accessing employment.

## **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.

## **7.0 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 6312 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, landscaping, biodiversity flood risk and air quality. Officers have recommended conditions, and s106 heads of terms, where necessary to make the scheme acceptable in planning terms.

## **8.0 COMMUNITY INFRASTRUCTURE LEVY (CIL)**

Based on the information given on the plans, the Mayoral CIL charge will be £437,232.24 (6312sqm x £69.27 and the Haringey CIL charge will be £0 as the use is subject to a Nil Rate.

## **9.0 RECOMMENDATION**

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

## **APPENDIX 1 - Planning Conditions and Informative**

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.

2. The development hereby authorised shall be carried out in accordance with the following approved plans and specifications:

Site Location Plan 5554-CA-00-00-DR-A-00051 Rev PL3  
Site Location Plan 5554-CA-00-00-DR-A-00100 Rev P3  
Proposed Masterplan 5554-CA-00-00-DR-A-00050 Rev PL6  
Existing Plan 5554-CA-01-00-DR-A-01001 Rev PL3  
Existing Elevations 5554-CA-01-00-DR-A-01002 Rev PL1  
Proposed Site Plan 5554-CA-01-00-DR-A-00100 Rev PL4  
Proposed Site Section 5554-CA-01-00-DR-A-03105 Rev PL4  
Proposed Warehouse Plan 5554-CA-01-00-DR-A-01100 Rev PL2  
Proposed Ground and First Floor Plans 5554-CA-01-00-DR-A-01110 Rev PL3  
Proposed Roof Plan 5554-CA-01-00-DR-A-01115 Rev PL4  
Proposed Elevations 5554-CA-01-00-DR-A-02100 Rev PL3  
Proposed Warehouse Sections 5554-CA-01-00-DR-A-03100 Rev PL3  
Proposed Office Sections 5554-CA-01-00-DR-A-03101 Rev PL2  
Proposed Building External Finishes 5554-CA-01-00-DR-A-41001 Rev PL2  
Proposed Fencing Details 5554-CA-01-00-DR-A-93001 Rev PL3  
Proposed Car Park Lining Plan 5554-CA-01-00-DR-A-94010 Rev PL3  
Proposed Cycle Shelter Details 5554-CA-00-00-DR-A-97001 Rev PL3  
Proposed Landscape Masterplan 15192A-30-C01-05  
Proposed Landscape Eastern Elevation 15192A-30-I01-01  
Proposed Drainage 40130-BGL-XX-XX-DR-C-00210 Rev P04  
Existing Plan 5554-CA-02-00-DR-A-01001 Rev PL1  
Proposed Site Plan 5554-CA-02-00-DR-A-00100 Rev PL2  
Proposed Warehouse Plan 5554-CA-02-00-DR-A-01100 Rev PL1  
Proposed Ground and First Floor 5554-CA-02-00-DR-A-01110 Rev PL1  
Proposed Mezzanine and Roof 5554-CA-02-00-DR-A-01111 Rev PL1  
Proposed Roof Plan 5554-CA-02-00-DR-A-01115 Rev PL1  
Proposed Elevations 5554-CA-02-00-DR-A-02100 Rev PL1  
Proposed Warehouse Sections 5554-CA-02-00-DR-A-03100 Rev PL1  
Proposed Office Sections 5554-CA-02-00-DR-A-03101 Rev PL1  
Proposed Building External Finishes 5554-CA-02-00-DR-A-41001 Rev PL1  
Proposed Fencing Details 5554-CA-02-00-DR-A-93001 Rev PL1  
Proposed Car Park Lining Plan 5554-CA-02-00-DR-A-94010 Rev PL1  
Proposed Cycle Shelter Details 5554-CA-02-00-DR-A-97001 Rev PL1  
Proposed Landscape Masterplan 14884A-30-C02-02  
Planning Statement May 2024  
Design and Access Statement August 2024  
Energy and Sustainability Statement  
BREEAM Pre-Assessment May 2024 External Lighting Assessment August 2024  
Flood Risk Assessment and Drainage Strategy August 2024  
Transport Assessment August 2024  
Framework Travel Plan August 2024  
Management Plan August 2024 TTP Consulting Site Waste Management Plan  
(Construction and Demolition) May 2024



Construction and Logistics Plan May 2024  
Framework Delivery and Servicing Management Plan (Unit 1) August 2024  
Framework Delivery and Servicing Management Plan (Unit 2) May 2024  
Arboricultural Survey May 2024  
Arboricultural Impact Assessment May 2024  
Air Quality Assessment August 2024  
Remediation Strategy May 2024  
Geo Environmental Assessment May 2024  
Noise and Vibration Impact Assessment May 2024  
Daylight and Sunlight Assessment May 2024  
Ecological Impact Assessment (inc. Biodiversity Net Gain) August 2024  
Construction Environmental Management Plan May 2024  
Fire Statement May 2024

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.

### **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, boundary fence 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. 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.

### **6. Demolition/Construction Environmental Management Plans (PRE-COMMENCEMENT)**

- a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst
- b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.

The following applies to both Parts a and b above:

The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:

- i. A construction method statement which identifies the stages and details how works will be undertaken;
- ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;
- iii. Details of plant and machinery to be used during demolition/construction works;
- iv. Details of an Unexploded Ordnance Survey;
- v. Details of the waste management strategy;
- vi. Details of community engagement arrangements;
- vii. Details of any acoustic hoarding;
- viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);
- ix. Details of external lighting; and,

- x. Details of any other standard environmental management and control measures to be implemented.
- d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:
  - i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;
  - ii. Details confirming the Plot has been registered at <http://nrmm.london>;
  - iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;
  - iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);
  - v. A Dust Risk Assessment for the works; and
  - vi. Lorry Parking, in joint arrangement where appropriate.

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

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

### **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.

### **Construction Management Plan (including construction logistics plan)**

- 8. 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.

### **Uses**

- 9. 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.

### **Cycle Parking**

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

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

### **Drainage**

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

- a) The surface water generated by this development for all the rainfall durations starting from 15 min to 10080 min (7 days not 1 day) and intensities up to and including the climate change adjusted critical 100 yrs. storm can be

accommodated and disposed of without discharging onto the highway and without increasing flood risk on or off-site.

b) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method.

c) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development.

d) The development shall not be occupied until the Sustainable Drainage Scheme for the site has been completed in accordance with the approved details and thereafter retained.

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

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

Reason: In the interest of creating safer, sustainable communities.

### **Secure by design certification**

14. Prior to the first occupation of each building, or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.

Reason: In the interest of creating safer, sustainable communities.

### **Energy Strategy**

15. The development hereby approved shall be constructed in accordance with the Energy and Sustainability Statement by Cudd Bentley (dated 16 August 2024) delivering a minimum 122% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 260 kWp solar photovoltaic (PV) array and inverter capacity.

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

- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;
- Confirmation of the necessary fabric efficiencies to achieve a minimum 18% reduction;
- Details to reduce thermal bridging;
- Confirmation of location, specification and efficiency of the proposed ASHPs and MVHR with plans showing the relevant pipework, and noise and visual mitigation measures;
- Confirmation of PV details, 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); inverter capacity; and how the energy will be used on-site before exporting to the grid;
- Specification of any additional equipment installed to reduce carbon emissions, if relevant;
- 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.

(b) The solar PV arrays and air source heat pumps must be installed and brought into use prior to first occupation of the relevant unit. Within 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, and an energy generation statement for the period that the solar PV array has been installed. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.

(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.

### **Overheating**

16. The overheating mitigation measures should be implemented prior to the occupation of the relevant unit and be retained for the lifetime of the development to reduce the risk of overheating in habitable rooms in line with the Thermal Comfort Assessment prepared by Cudd Bentley (dated 21 June 2024) and Response to Queries Raised by LBH. This includes g-values of 0.34, tree planting, openable windows, high-albedo materials and window shading.

Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.

### **Urban Green Factor**

17. 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**

18. (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.

### **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.

### **Plant 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.

### **Section 278 (Highway Works) Agreement**

22. 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.

### **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.

### **Disabled parking bays**

24. Prior to occupation the applicant will be required to submit and provide plans showing all commercial units having access to a wheelchair accessible car parking spaces from the onset; this must be submitted for approval before any development commences on site.

Reason: To ensure the development is in accordance with the published London Plan 2021 T6.5 disabled.

### **Car Parking Management Plan**

25. (a) Prior to first occupation a Car Parking Design and Management Plan (CPMP) relating to the proposed accessible space shall be submitted to and approved in writing by the Local Planning Authority.

(b) The CPMP shall include details of the following:

- ii. Location and design of the car parking space(s).
- iii. Provision of Electric Vehicle Charging Point(s) (direct provision for the space(s)).
- iv. Allocation, management and enforcement of the car parking space(s) (prioritising wheelchair users, then other people with disabilities, then others as part of a dynamic strategy to prioritise use and minimise redundancy of the space(s)).

Reason: To manage the on-site car parking provision of the proposed development so that it is used efficiently and only by authorised occupiers. To protect the amenity of the site users. To promote sustainable travel.

### **Electric Vehicle Charging**

26. Prior to occupation of the development hereby approved, 6 of car parking shall be provided with electric vehicle charging infrastructure, with a further 25 allocated for passive provision.

Reason: to be in accordance with published Haringey Council Development Management DPD, Chapter 5 Transport & Parking and the published London Plan 2021 Policy T6.1 Residential Parking.

### **Hard and soft landscape works**

27. Prior to the first occupation of the development hereby approved full details of both hard and soft landscape works shall be submitted to and approved in writing by the Local Planning Authority, and these works shall thereafter be carried out as approved.

Details shall include information regarding, as appropriate:

- a) Means of enclosure;
- b) Hard landscaping surfacing materials;
- c) Planting plans including an assessment of existing and proposed trees;
- d) Written specifications (including details of cultivation and other operations associated with plant and/or grass establishment);
- e) Schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; and

The approved scheme of planting, seeding or turfing comprised in the approved details of landscaping shall be carried out and implemented in strict accordance with the approved details in the first planting and seeding season following the occupation of the building or the completion of development (whichever is sooner). Any trees or plants, either existing or proposed, which, within a period of five years from the completion of the development die, are removed, become damaged or diseased shall be replaced in the next planting season with a similar size and species. The landscaping scheme, once implemented, is to be retained thereafter.

Reason: In order for the Local Planning Authority to assess the acceptability of any landscaping scheme, thereby ensuring a satisfactory setting for the proposed development in the interests of the visual amenity of the area consistent with Policy DM1 of the Development Management DPD 2017 and Policy SP11 of the Local Plan 2017.

### **Tree Protection Plan**

28. A tree protection plan and reserved arboricultural method statement shall be submitted in writing and approved by the Local Planning Authority.

Reason: In order to safeguard the trees on the site which are to remain after building works are completed in the interests of visual amenity.

### **Noise Management**

29. A detailed Noise Management Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the use agreed and shall include, but is not limited to, details of all noise management controls to be implemented to limit the potential for neighbour disturbance.

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.

### **Noise Management Monitoring**

30. Prior to the commencement of the use or within a timetable as agreed with the Local Planning Authority, tests shall be carried out to verify compliance with these levels and the results of these tests shall be submitted to and approved in writing by the Local Planning Authority. If the specified levels have been exceeded, details of the measures which will be taken to remedy this breach will be submitted to and approved in writing by the Local Planning Authority and implemented in full prior to the commencement of use of the development.

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.

### **Living roofs**

31. (a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:
- i) A roof plan identifying where the living roofs will be located;
  - ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm);
  - iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate
  - iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m<sup>2</sup> of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m<sup>2</sup>, rope coils, pebble mounds of water trays;
  - v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m<sup>2</sup>) and density of plug plants planted (minimum 20/m<sup>2</sup> with root ball of plugs 25cm<sup>3</sup>) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);
  - vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and
  - vii) Management and maintenance plan, including frequency of watering arrangements.
- (b) Prior to the occupation of the unit, evidence must be submitted to and approved by the Local Planning Authority that the living roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the

lifetime of the development in accordance with the approved management arrangements.

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

## **INFOMATIVES**

### **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: COMMUNITY INFRASTRUCURE LEVY (CIL)**

Based on the information given on the plans, the Mayoral CIL charge will be £437,232.24 (6312 sqm x £69.27) 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 advertisement consent. This is in accordance with 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 of charge and can be contacted via [docomailbox.ne@met.police.uk](mailto:docomailbox.ne@met.police.uk) or 0208 217 3813.

#### INFORMATIVE: Pollution

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

## Appendix 2 – Plans and images

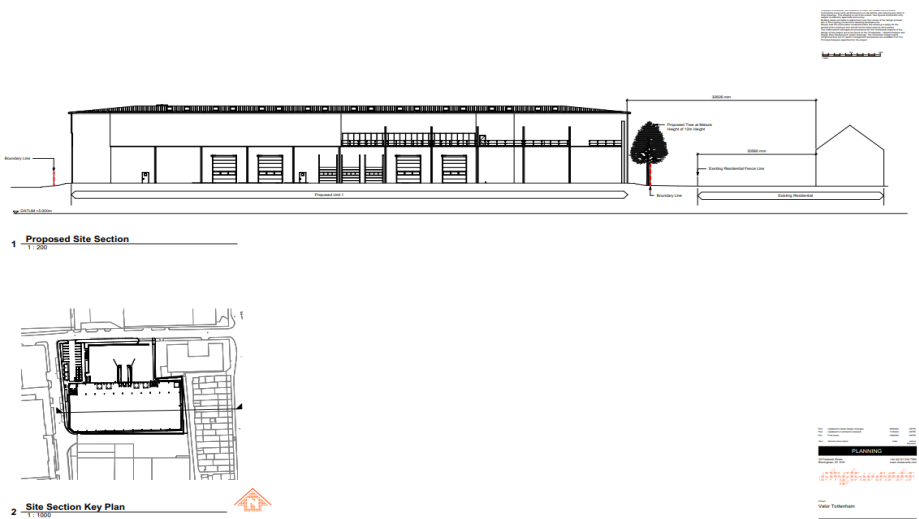


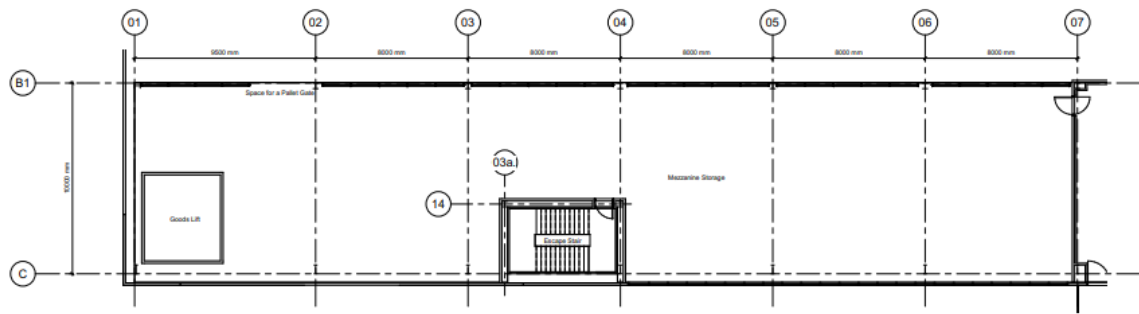
Site location plan



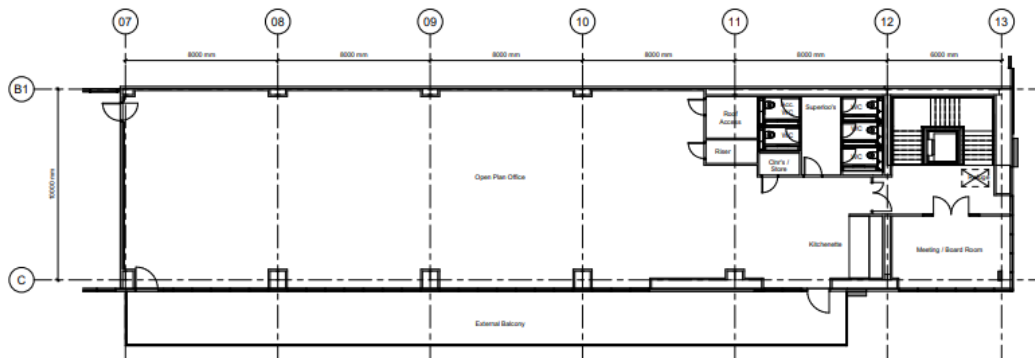


## Unit 1 – Elevations & Sections

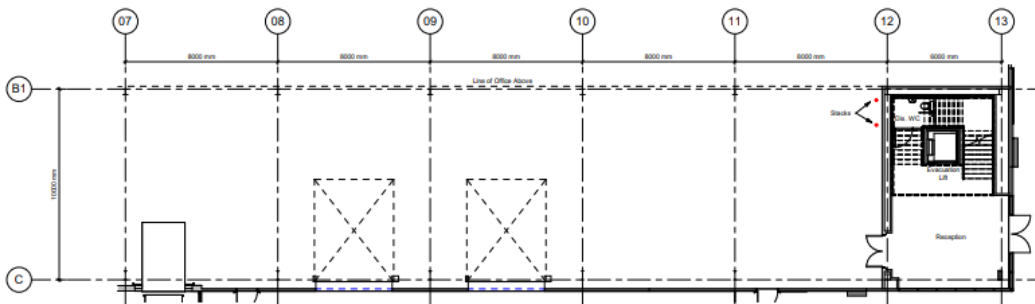




**3 First Floor Plan Mezzanine Storage**  
1: 100



**2 First Floor Plan View +7.150m**  
1: 100

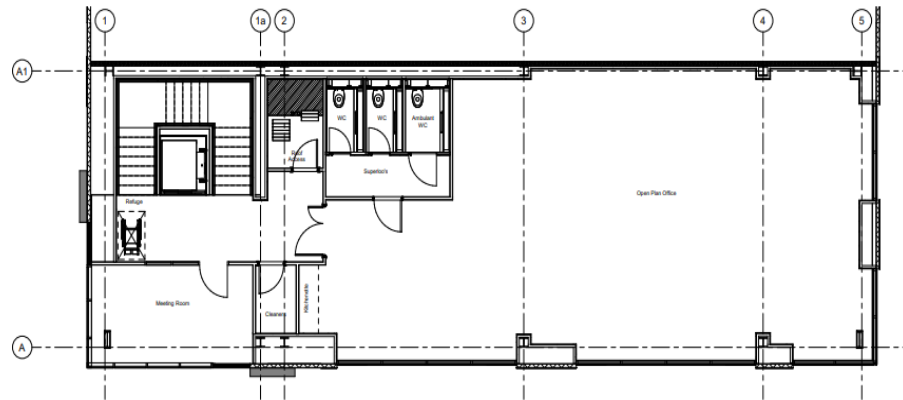


**1 Ground Floor Plan View +0.00m**  
1: 100

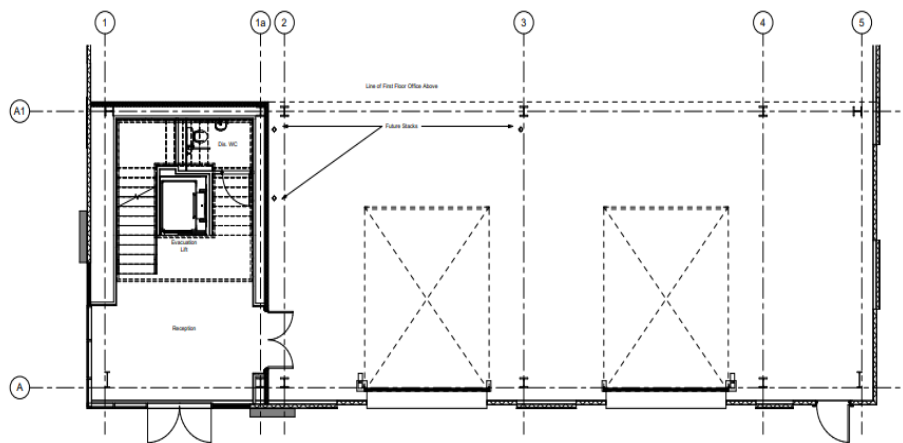
## Unit 1- floor plans



## Unit 2: Elevations

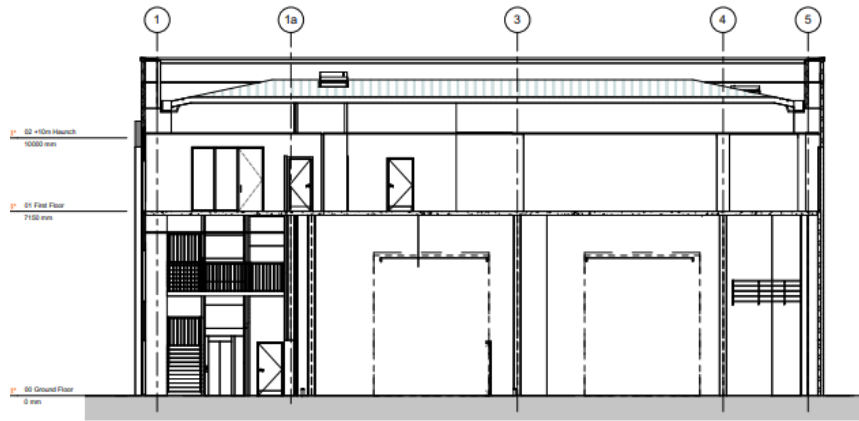


2 First Floor Plan View +7.150m  
1:50



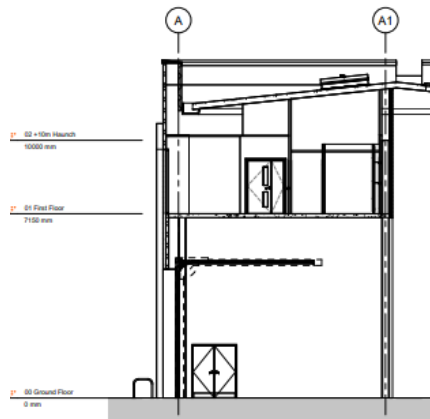
1 Ground Floor Plan View +0.00m  
1:50

## Unit 2- Floor plans



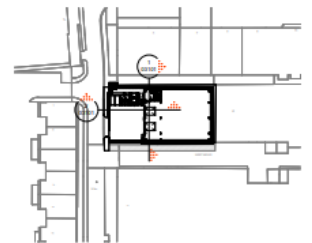
**Main Office Section 3**

1 : 75



**Main Office Section 4**

1 : 75

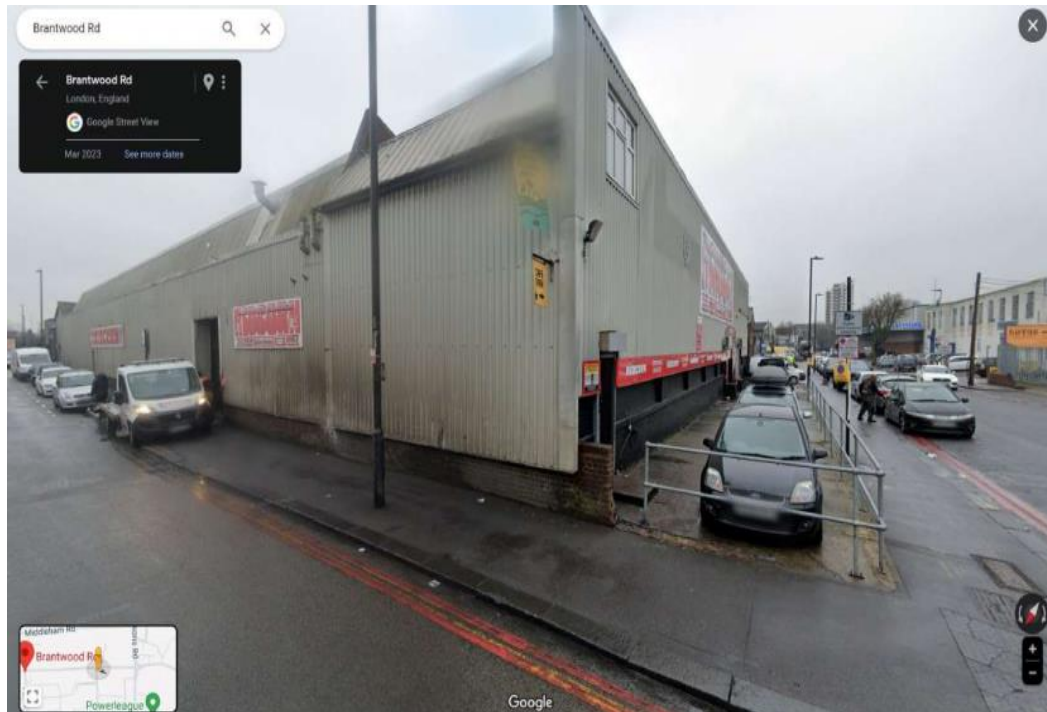


**Office Section Key Plan**

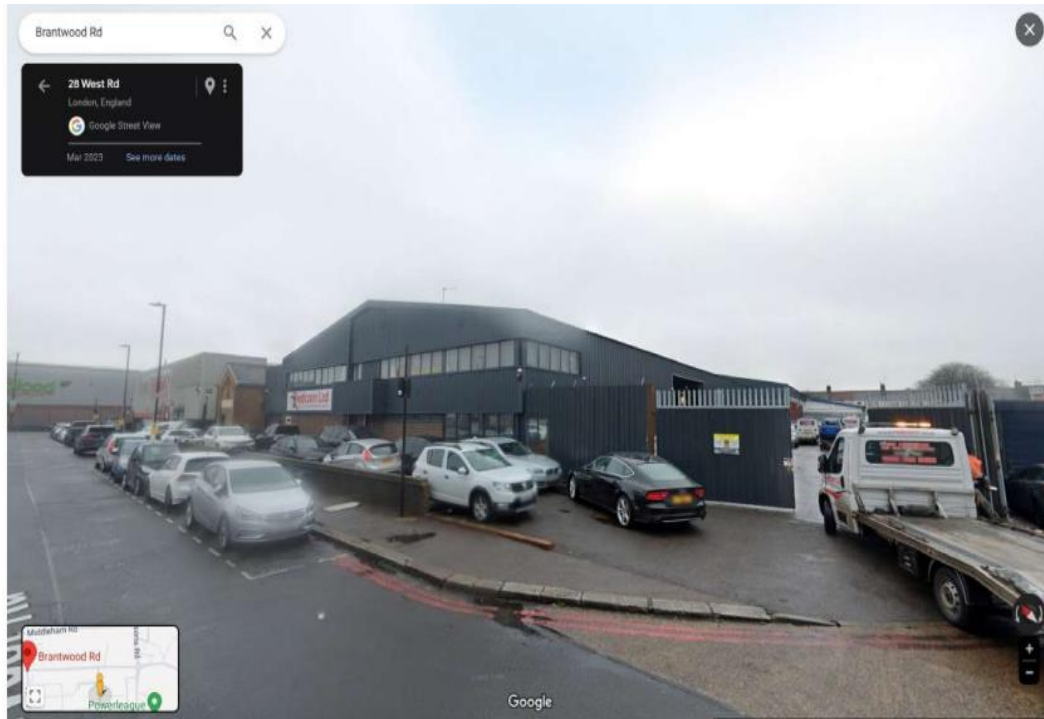
3 1 : 1000

## Unit 2-sections

## Photographs of sites



Unit 1



Unit 1 View from West Road



Unit 1 View from Brantwood Road



**Existing photograph of Unit 2**





Unit 2 West Road View

### Appendix: 3 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
<b>INTERNAL</b>		
<b>Design Officer</b>	<p>HGY/2024/1370 - 18 West Road &amp; Unit 4 West Mews, Tottenham, London N17</p> <p>Demolition, clearance and redevelopment of 18 West Road and Unit 4 West Mews comprising 2no. warehouses (Use Class B2/B8) with ancillary mezzanine floorspace and associated landscaping, yard, parking, access and infrastructure</p> <p>Thank you for asking for my comments on the above application. I have been closely involved in discussions on these proposals from early in the pre-application process, including the Quality Review Panel (QRP) on 6th March and am therefore very familiar with the site and their proposals.</p> <p>The proposals are for two separate, non-adjacent sites, on the same street, West Road, that forms part of the Brantwood Road Industrial Estate, which is designated as Strategic Industrial Land in the London Plan and Haringey's Local Plan. This industrial area, alongside a neighbour to its east, occupies the extreme north-eastern corner of the borough of Haringey, in Northumberland Park ward, beside the border with the borough of Enfield. The larger, northern site sits at the T-junction of West Road with Brantwood Road, which runs west to Tottenham High Road at the northern end of the North Tottenham local centre and east to Watermead Way, which provides easy access to the North Circular. To the south and west, the industrial estate borders residential areas, mainly the existing, often high-rise and high-density, estates of Northumberland Park, allocated in the Local Plan Tottenham AAP for a masterplanned comprehensive regeneration to increase housing,, employment and social infrastructure, with the new Tottenham Hotspur Stadium, and its surrounding, rapidly expanding, emerging new town centre of North Tottenham just beyond. To the north, Enfield Council are developing complimentary neighbourhood residential and town centre intensification in Edmonton and a major regeneration area at Meridian Water.</p>	Support noted.

Stakeholder	Question/Comment	Response
	<p>There has been a great deal of interest and research in the last couple of years, pioneered by the Greater London Authority, and enthusiastically followed by Haringey, in Industrial Intensification; seeking a move away from low density, vehicle dominated industrial and warehouse buildings employing only a few, to greater building density, greater site coverage, greater height, even multi-storey, with smaller areas of parking and vehicle servicing, better provision of low-carbon access such as electric vehicles, cycling and walking and enhanced, more walkable public realm. The area in general and the site in particular are therefore well suited to significant industrial intensification. However, there is also a London-wide recognition of increasing need for Logistics, to meet growing demand for deliveries, and this is what these applicants are proposing for this development. Logistics operations can be reminiscent of warehousing, but the applicants have explained that this will be an employment-intensive site with 24-hour operation and many more employed on site than either warehousing or even conventional, single-storey manufacturing.</p> <p>The applicants have also included a significant amount of office space at a mezzanine level in both proposed buildings, as well as further ancillary storage that could easily be converted to more office accommodation in the larger proposed building. In general, the height of the proposals are higher than those they replace / or are surrounded with, that date from between the 1930s and the 1990s. This will allow more efficient automated storage for rapid distribution, as required by the rapidly evolving logistics sector, and is another way in which this proposal represents greater intensity of use than the existing or than typical low-density manufacturing or warehousing. In both cases there will also be a prominent double height glazed entrance for office staff, customers and other visitors, in the case of the larger Unit 1 on the northern site, this will be located on the prominent north-west corner, which also brings it close to the West Road street frontage, improving the proposal's contribution to animating the street frontage.</p> <p>Both proposed sites will contain a reasonable area of both staff parking and vehicle delivery, with modern delivery docks suitable for different sized vehicles, for</p>	

Stakeholder	Question/Comment	Response
	<p>maximum logistics delivery, and with plentiful provision of electric charging points. In the larger, northern site, this will be on the Brantwood Road street frontage, allowing the building to be closer to the West Road frontage whilst still allowing an openness at the corner. The smaller southern building (Unit 2) has just a West Road frontage. But the staff / customer entrance will still be visible from the street. Modest, transparent-appearance fencing is proposed to separate these delivery areas (including the parking for Unit 2) from the street, but the parking and the approach routes to the main entrances, as well as the border of Unit 1 along West Road promise to be generously landscaped. Landscaping includes seating for staff outdoor amenity and trees to improve the greening of the site and its contribution to the public realm, although the QRP request that the development contribute to new street trees has not been possible.</p> <p>The works to the landscaping and public realm to Unit 1 also include two new electricity sub-stations, replacing one insufficiently sized and inconveniently located (from the point of view of these developers) existing substation, that is nevertheless an attractively designed, if utilitarian structure, in a robust brick with a pitched roof and a particularly attractive carved stone plaque reading “THE NORTH METROPOLITAN ELECTRIC POWER SUPPLY Co”. The proposal is to replace this with two new substations, that will nevertheless be in brick, albeit with a flat roof, and the carved plaque will be retained for relocation on one of the new sub-stations, which will also contribute to the landscaping of the site, adding to the sense of enclosure along West Road and sense of separation of the car park from the street.</p> <p>The overall height of the proposal for Unit 1 was also a concern to officers and the QRP with respect to its potential impact on the backs of houses on Willoughby Lane. This two-storey terrace of houses will back onto the eastern boundary of the site, where the new building will be built close to that boundary, at a somewhat increased height compared to the existing, and in the form of a blank façade. Nevertheless, the proposal is not right up against the boundary; there will be a gap. There is then a green, naturally overgrown strip, followed by a private alleyway, shared by those houses, gated at either end, before the back garden walls of the houses; the total</p>	

Stakeholder	Question/Comment	Response
	<p>distances from the back of the houses to the back of the proposed Unit 1 will be at a minimum 32.826m (Willoughby Lane being slightly angled away so houses backing on to the north-east corner will be closest), with 20.56m being the back garden of the houses themselves. In addition, the applicants include new trees in their site along this boundary, and the existing alleyway contains some further (presumably self-seeded) trees, particularly at the northern end of the alleyway. Their elevations and modelled views from these houses show that their outlook would be similar to, if not improved on the existing, despite the proposal's additional height, and day and sunlight tests show that there would be virtually no noticeable impact on the residents' amenity. Unit 2 does not adjoin any residential properties; all its boundaries, and all the other boundaries of Unit 1, are to other industrial sites and buildings.</p> <p>The proposed materials palette for the two buildings is to use modern materials; Kingspan metallic cladding in pure grey, anthracite grey and olive green, with horizontal joints, to both buildings, but with the pure grey to the main entrance facades and turning the corners in ribbed panels, more reminiscent of the texture of brickwork. These are all durable materials, in harmonious complimentary colours that will be appropriate to the corporate identity of the developer, Valor, as well as pleasingly modest and "unshouty" (compared to many of their neighbours), and in the range of materials that have come to be expected for this type of development. The QRP supported the choice of materials and this simple, clean architecture; they requested that green roofs be investigated, but it is understood that it is not possible nor necessary to achieve urban greening requirements, and any green roofs would not be visible from either any nearby public realm or neighbouring buildings.</p> <p>Overall, the proposals for these two nearby but not quite neighbouring buildings are simple, clean and elegant, with high quality landscape designed in, and should encourage the attraction of much needed logistics businesses to this suitable accessible location. Not all the highest aspirations of officers and reviewers have been achievable, but the applicants have sought at all stages to accommodate the maximum public benefit possible in these competitive developments. They have</p>	

Stakeholder	Question/Comment	Response
	received on balance general support of the QRP, and similarly receive on balance the support of the design officer.	
<b>Transportation</b>	<p>HGY/2024/1370 - 18 West Road &amp; Unit 4 West Mews, Tottenham, London N17</p> <p>Demolition, clearance and redevelopment of 18 West Road and Unit 4 West Mews comprising 2no. warehouses (Use Class B2/B8) with ancillary mezzanine floorspace and associated landscaping, yard, parking, access and infrastructure</p> <p>Updated comments 16/8/24</p> <p>This application is for redevelopment of these two sites and the construction of two B2/B8 light industrial units, Unit 1 with a GEA of 5646 sqm, and Unit 2 with a 1109 sqm GEA.</p> <p>These comments are updated from those produced on the 29th July 2024, as the applicant has now revised the locations of the substations and the permanent car park access for plot 1 (relocated to West Road from Brantwood Road).</p> <p>The applicant has provided proposals drawings for the changes and now needs to submit an updated Transportation Assessment to cover these changes.</p> <p>Location and access These sites are located to the eastern side of West Road, Plot 1 abuts Brantwood Road and currently comprises two buildings/plots which are at the northern end of West Road.</p> <p>The second, smaller site (Plot 2) is to the south of this and again located on the eastern side of West Road.</p> <p>The sites have a PTAL value of 2, considered 'poor' access to public transport services. There are two bus services available within 2 to 6 minutes walk of the site, and Northumberland Park Station is a nine minute walk away.</p>	<p>Support</p> <p>Noted and conditions 8 and 10 including obligation attached requesting details of (CMP) and (Cycling parking details).</p>

Stakeholder	Question/Comment	Response
	<p>The PTAL value doesn't appear to reference the relatively new Meridian Water Station, which is a similar walk time/distance away from the site as Northumberland Park Station.</p> <p>The site is also located within the Tottenham Event Day CPZ, which operates on match and event days and evenings at the Tottenham Hotspur Stadium. Therefore, most of the time, there are no active CPZ restrictions/measures in place.</p> <p>Planning history There have been a number of previous applications for these two plots/sites (albeit these did not include the full extent of the proposed northernmost site abutting Brantwood Road).</p> <p>These have been associated with the vehicle dismantling operations that are carried out in the locality at existing ongoing sites. The previous applications have included proposals for the provision for both a lorry park and vehicle storage. These have been refused by planning, and a factor in the decisions has been concerns that the proposals would worsen existing highway safety, traffic flow and parking enforcement problems.</p> <p>There has also been issues with damage to highway infrastructure relating to the vehicle dismantling and loading/unloading/moving operations.</p> <p>The previously refused applications all had potential to increase the severity of the current problems experienced by neighbours and the Highway and Parking Authority.</p> <p>Development proposal This proposal is for the construction of two B2/B8 light industrial units, Unit 1 with a GEA of 5646 sqm, and Unit 2 with a 1109 sqm GEA. New access arrangements are proposed with accesses off Brantwood Road and West Road for Unit 1 and what appears to be a larger access for Unit 2 off West Road.</p>	

Stakeholder	Question/Comment	Response
	<p>It is noted that overall, there will be a reduction in building floor area compared to present. The existing buildings over the two sites have a floor area of around 8400 sqm.</p> <p>It is also noted that there is a separate application for the placement of two new electrical substations associated with the redevelopment of these sites (ref; HGY/2024/1200). The substations are shown as being located within the car parking area for plot 1. Transportation officers have already considered and provided observations on this application. The access and parking for these was originally intended to be off Brantwood Road, however as commented elsewhere in this response the access is now proposed off West Road and is part of the overall proposals within this application.</p> <p>Subsequent to the comments of the 29th July, the applicant has now relocated the substations slightly to the north, and moved the proposed access for the plot 1 car park to West Road.</p> <p>Trip generation The TA includes trip generation information comparing the existing/consented uses of the two plots against the B2/B8 proposals, and essentially the trip numbers considered during the peaks and a 12 hours daily count are similar to the existing/consented use for plot 1, with maximum peak period trips for B8 use of 27 arrivals and 7 departures and a daily tally of 164 arrivals and 174 departures again for the B8 use (B2 usage would result in a lower number of trips). These numbers are very similar to the existing usage, and accordingly it is not considered there are any adverse trip generation implications with this proposal.</p> <p>For HGV and LGV movements, a slightly lower number than for the consented uses is predicted from the trip generation assessment. Tables 5.8 though to 5.10 in the TA detail TRICS outputs for the existing land use and floor area and for this development. The existing land use and floor area is predicted to generate 35 LGV and 36 HGV arrivals/departures on a daily (12 hour) basis, with 33 LGV/31 HGV for the two new</p>	



Stakeholder	Question/Comment	Response
	<p>sites included in this application. The Delivery and Servicing Plan will detail and summarise the management arrangements for these trips to and from the site to ensure efficiencies and to minimise any potential impacts on the operational public highway.</p> <p>Highway conditions in the locality of the site There have historically been a number of existing highway and parking issues occurring in the locality of the site. These include inappropriate parking, handling of end of life vehicles within the highway, congestion, and physical damage to highway infrastructure.</p> <p>The proposed arrangements with this application should reduce and mitigate the above highway issues that were experienced with the former uses at these sites.</p> <p>Healthy streets assessment</p> <p>Included within the TA is a HSA that has reviewed 6 different routes to and from the site. The findings of the assessment were that there are gaps in tactile paving provision at a number of the pedestrian crossings that would be used by pedestrians to walk to and from the sites.</p> <p>It is suggested that a Section 106 Contribution of £25,000 be made towards improvements to the walking and cycling environment be made to remedy these shortcomings found with the Healthy Streets Assessment and by doing so further improve conditions for active and sustainable modes accessing the site.</p> <p>Car/vehicle parking</p> <p>At present, there is informal parking taking place for plot 1, and plot 2 had been used by Redcorn for vehicle storage. 7 to 8 cars have been able to park to the frontage of Plot 2 and these vehicles have passed over the footway to access.</p>	

Stakeholder	Question/Comment	Response
	<p>There are no specific maximum parking standards for B2/B8 development within The London Plan, which comments that developments should be considered on a one by one basis. 26 car parking spaces are proposed for unit 1, and 5 for unit 2.</p> <p>The TA comments that the parking provision proposed has been arrived at to take into consideration, potential operational requirements and commercial/viability considerations. It also comments that the level of parking proposed should minimise any likelihood of generating additional on street parking demands.</p> <p>Blue badge parking is included, with one space at each parking location and EV charging points are also included (4 for plot 1 and 2 for plot 2). It is assumed these will be active charging points, ideally passive provision should also be made.</p> <p>A Parking stress survey has been undertaken for this application. This recorded parking conditions within a 500m walk distance between the hours of 0700 and 1500. This recorded a highest parking stress of 78% with 156 spaces available within the 727 in the 500m walk distance from the site. This was during the 0700 survey.</p> <p>Overall, with respect to parking, it doesn't appear that there is a likelihood of the development worsening on street parking conditions which are not critical at present. The parking provision proposed may be an overprovision, however the future tenants/occupiers are unknown at present and whilst the proposed on site parking should meet future development demands there are no guarantees this will be the case.</p> <p>Overall, to follow the draft travel plan mode share targets to reduce private car journeys to the site, the applicant should seek to reduce car parking at the site, particularly for plot 1, over time. This can be covered in the Parking Management Plan in conjunction with the Travel Plans.</p> <p>Formal parking controls in the locality of the site are under the Tottenham Event Day CPZ which only comes into play on match and event days.</p>	

Stakeholder	Question/Comment	Response
	<p>The Council's parking team have implemented 'Red Route' arrangements at the site to assist in managing parking issues taking place in the locality. The Parking team does have plans to increase CCTV surveillance and refine parking controls in the immediate area along West Road and Brantwood Road. As a consequence of the S278 works some of the waiting and loading arrangements will change, and given the history and issues experienced here a suggested contribution of £40,000 is referenced to go towards further future refinements and the upgrading of CCTV surveillance and on street enforcement and monitoring.</p> <p>Cycle parking High Quality long and short stay cycle parking to meet the numerical requirements of the London Plan is required, along with full details of the proposed cycle parking arrangements, confirming that useable, secure and attractive cycle parking will be provided for employees and visitors to the site.</p> <p>Cycle parking standards are set out in Table 10.2 of the London Plan for Class B2 / B8 as follows;</p> <ul style="list-style-type: none"> <li>• Long Stay: a minimum of 1 space per 500sqm GEA); and</li> <li>• Short Stay: a minimum of 1 space per 1,000sqm GEA.</li> </ul> <p>The applicant references the London Plan requirements as 18 spaces for Unit 1 with 12 long stay and 6 short stay spaces, and 6 spaces for Unit 2 with 4 spaces for long stay and 2 spaces for short stay to meet the above standards.</p> <p>The details included in the application show provision of 40 spaces for plot 1 (34 long stay/6 short stay) and 18 for plot 2(12 long stay and 6 short stay). External secure cycle parking is proposed using a double stacking system within a secure shelter and Sheffield stands for visitor cycle parking, and there is reference to provision of lockers and showers internally.</p>	

Stakeholder	Question/Comment	Response
	<p>All cycle parking is required to meet the London Cycle Design Standards as produced by TfL. Whilst some layout and dimensional details have been provided, A pre commencement condition will be required for submission of full dimensional details and arrangements for the proposed cycle parking to demonstrate compliance with the above standards. It is acknowledged that much of the detail has been submitted already, the condition can require provision of a standalone document/drawings showing full cycle parking details.</p> <p>Site arrangements and layout/access arrangements There are highway access changes proposed with this application. Following the earlier transportation comments of the 29th July 2024, the applicant has now revised the arrangements for the car park access to plot 1.</p> <p>The proposed arrangements for plot 1 remain as two crossovers/accesses, with the service yard access off Brantwood Road. This access is detailed as a widened existing access, widened to 12m. This is intended to serve the open loading yard area within which HGV's will park and dwell. It is not detailed what the existing access width is.</p> <p>There is also a second crossover/access proposed to service both the plot 1 car park and provide access to the substations associated with this development. The access for this car park was originally intended off Brantwood Road, however there were highway safety concerns with this and the applicant has relocated to the eastern side of West Road. The applicant has provided the revised details and in principle these are acceptable to Transportation subject to the normal Highways Act approvals process via the S278 agreement.</p> <p>A Section 278 Agreement under the Highways Act will be required to cover the design and implementation of the highway works associated with both sites within this application to cover the access/crossover changes and resultant amendments to existing on street waiting and loading arrangements.</p>	

Stakeholder	Question/Comment	Response
	<p>For plot 2 a single 10m wide crossover/access is proposed to enable access to a loading area and 5 car parking spaces. It is commented that this is a widening of the existing access however the width of this is not provided.</p> <p>Visibility splays have been provided to show the access/egress manoeuvres for a 16.5m articulated lorry accessing the loading area for Plot 1, and a 7.5 tonne van for plot 2. These appear fine in terms of accommodating the manoeuvres, however we do have a question as to the width of the crossover for plot 2 as it appears that 7.5 tonne vans have plenty of space to access. This aspect can be assessed during the Section 278 design check process.</p> <p>The proposed arrangements are intended for all visiting vehicles being able to access and egress the sites in a satisfactory manner, and as a consequence this should remove the on street loading that has historically taken place associated with the former car breaking and vehicle disposal uses at these sites.</p> <p>Delivery and servicing arrangements</p> <p>Draft delivery and servicing plans for each plot have been submitted. These give an overview of the expected arrangements for the development. A condition for a delivery and servicing plan for the development will be appropriate to collate all relevant information and details and demonstrate best principles with the proposed arrangements once there is greater clarity over the future occupiers and their delivery and servicing requirements. The predicted numbers of delivery and servicing trips are slightly lower than for the existing floor areas and land uses at the site.</p> <p>Framework Travel Plan</p> <p>A detailed draft of a Framework travel plan is included within the application. The format and structure of this are fine in terms of the travel planning principles that are appropriate, and it includes mode share targets to reduce car/van trips by employees to and from the site by 10% over 5 years along with an increase in cycle mode share</p>	

Stakeholder	Question/Comment	Response
	<p>from 3% to 10%. As initial targets these are appropriate, and obviously can be refined as required upon review of surveys.</p> <p>As there will be two distinct sites within this application, two separate travel plans will be required as the nature of the future tenants/occupiers could well be very different.</p> <p>A Travel Plan Monitoring fee for each travel plan of £3000 per annum for a period of 5 years will be required to cover officer time for review, queries, and analysis of survey results, will be required, this must be secured by the S106 legal agreement.</p> <p>Construction Phase</p> <p>A draft of a Construction Logistics Plan accompanies the application. A pre commencement condition requiring a detailed CLP will be needed, and the applicant will need to liaise and consult with Haringey's Network Management offices to discuss appropriate details with respect to management of the build out from the Highways perspective and any temporary measures for the highway sought.</p> <p>From the draft it is noted that the build out period is expected to be 12 months. Details of the management measures to ensure construction vehicles avoid arriving and departing during the AM and PM peak periods will be required, along with slot booking to prevent construction vehicles waiting on the highway. The CLP includes a proposal to restrict arrivals and departures to between 0900 and 1600, this can be discussed.</p> <p>The development will be expected to have 20 to 30 vehicle arrivals and departures a day, it is envisaged at the busiest periods of the build out and details of the vehicles expected to visit will be required including sizes and potentially swept path plots to demonstrate vehicles can access and egress in a forward gear.</p> <p>The draft CLP references the likely requirement of parking suspensions, these will need to be agreed with the Highway Authority. Details such as exact arrangements for wheel washing and keeping the highway clear of dirt and debris, and the</p>	

Stakeholder	Question/Comment	Response
	<p>arrangements to ensure forward access and egress to and from the sites will also be required.</p> <p>LBH Transport Planning would require that a Construction Logistics Plan (CLP) be submitted by the developer/applicant, this can be secured via a S.106 obligation. The developer/applicant will need to adhere to Transport for London's CLP guidance when compiling the document, construction activity should also be planned to avoid the critical school drop off and collection periods, the applicant will be required to pay a construction travel plan contribution of fifteen thousand pounds (£15,000) for the monitoring of the construction activities on site.</p> <p>Summary This application is for redevelopment of the two sites along West Road for new B2/B8 warehousing. A transport assessment accompanies the application and this has been reviewed.</p> <p>In terms of transportation impacts the numbers of trips compared to consented/existing are similar and not a greater magnitude. The applicant is proposing changes to the site accesses/crossovers which will require a Section 278 Agreement to cover the highway changes envisaged.</p> <p>Following the previous concerns raised in relation to the plot 1 car park/transformer access, the applicant has revised their proposals and is now intending to locate the plot 1 car park access off West Road. Initial details have been provided and these are acceptable subject to the normal Section 278 Agreement design checks and approvals by the Highway Authority.</p> <p>Car parking and cycle parking details have been provided, along with drafts of a framework travel plan, delivery and servicing plan and construction logistics plan. Fully detailed and worked up plans will be required and can be covered by condition.</p> <p>Overall transportation impacts and trip will not differ too much from the existing consented uses at the sites, it is considered that it is appropriate for the applicant to</p>	

Stakeholder	Question/Comment	Response
	<p>make financial contributions towards improving the pedestrian environment and routes to and from the site, as presented within their Healthy Streets Assessment, and also towards future refinements and improvements to the on street parking controls, surveillance and enforcement arrangements to appropriately manage the highway in the locality of this site.</p> <p>Subject to sight of an updated Transportation Assessment to cover the plot 1 access changes, and the following conditions and S106 contributions Transportation do not object to this application;</p> <p>Conditions</p> <p>1. Delivery and Servicing Plan and Waste Management The owner shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The service and delivery plan must also include a waste management plan which includes details of how refuse is to be collected from the site, the plan should be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying distance of a refuse truck on a waste collection day. It should demonstrate how the development will include the consolidation of deliveries and enable last mile delivery using cargo bikes.</p> <p>Details should be provided on how deliveries can take place without impacting on the public highway, the document should be produced in line with TfL guidance.</p> <p>The final DSP must be submitted at least 6 months before the site is occupied and must be reviewed annually in line with the travel plan for a period of 3 years unless otherwise agreed by the highway's authority.</p> <p>Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway and to comply with the TfL DSP guidance 2020</p>	



Stakeholder	Question/Comment	Response
	<p data-bbox="457 269 688 302">2. Cycle Parking</p> <p data-bbox="457 342 1656 483">The applicant will be required to submit plans showing cycle parking in line with the London Plan and the London Cycle Design Standard (LCDS) No Development (including demolition) shall take place on site until the details have been submitted and approved in writing by the Council.</p> <p data-bbox="457 524 1656 594">REASON: to be in accordance with the published London Plan 2021 Policy T5, and the cycle parking must be in line with the London Cycle Design Standards (LCDS).</p> <p data-bbox="457 634 848 667">3. Electric Vehicle Charging</p> <p data-bbox="457 708 1656 886">Subject to a condition requiring the provision of active electric vehicle charging points to serve the on-site parking spaces from the onset in Line with the London Plan. Reason: to be in accordance with published Haringey Council Development Management DPD, Chapter 5 Transport &amp; Parking and the published London Plan 2021 Policy T6.1 Residential Parking.</p> <p data-bbox="457 927 806 959">4. Disabled parking bays</p> <p data-bbox="457 1000 1656 1179">The applicant will be required to submit and provide plans showing all commercial units having access to a wheelchair accessible car parking spaces from the onset; this must be submitted for approval before any development commences on site. REASON: to ensure the development is in accordance with the published London Plan 2021 T6.5 disabled.</p> <p data-bbox="457 1219 932 1252">5. Car Parking Management Plan</p> <p data-bbox="457 1292 1656 1399">The applicant will be required to provide a Car Parking Management Plan which must include details on the allocation and management of the on-site car parking spaces including all accessible car parking spaces. This plan will also need to include the</p>	

Stakeholder	Question/Comment	Response
	<p>proposals for reducing on site parking over time to align with travel plan targets and as such the document will link to the travel plan.</p> <p>S.106 obligations</p> <p>1.0 Construction Logistics and Management Plan</p> <p>The applicant/developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £15,000 (fifteen thousand pounds) to cover officer time required to administer and oversee the arrangements and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and businesses. The plan shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved:</p> <ul style="list-style-type: none"> <li>a) 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.</li> <li>b) The estimated number and type of vehicles per day/week.</li> <li>c) Estimates for the number and type of parking suspensions that will be required.</li> <li>d) Details of measures to protect pedestrians and other highway users from construction activities on the highway.</li> <li>e) The undertaking of a highways condition survey before and after completion.</li> <li>f) The implementation and use of the Construction Logistics and Community Safety (CLOCS) standard.</li> <li>g) The applicant will be required to contact LBH Highways to agree condition on surveys.</li> <li>h) Site logistics layout plan, including parking suspensions, turning movements, and closure of footways.</li> <li>i) Swept path drawings.</li> </ul> <p>Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development in combination with other sites</p>	

Stakeholder	Question/Comment	Response
	<p>in the Wood Green area and to encourage modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect the amenity of neighbouring properties and to maintain traffic safety.</p> <p>2.0 Commercial Travel Plan</p> <p>A commercial travel plan for each site must be secured by the S.106 agreement and submitted 6 months before occupation. As part of the travel plan, the following measures must be included in order to maximise the use of public transport.</p> <p>a) The applicant submits a Commercial Travel Plan for the commercial aspect of the Development and appoints a travel plan coordinator who must work in collaboration with the Facility Management Team to monitor the travel plan initiatives annually for a period of 5 years and must include the following measures:</p> <p>b) Provision of commercial induction packs containing public transport and cycling/walking information, available bus/rail/tube services, showers. Lockers, map and timetables to all new staff, travel pack to be approved by the Councils transportation planning team.</p> <p>c) The applicant will be required to provide, showers lockers and changing room facility for the commercial element of the development.</p> <p>d) The developer is required to pay a sum of £3,000 (three thousand pounds) per year per travel plan for monitoring of the travel plan for a period of 5 years. This must be secured by S.106 agreement.</p> <p>e) The first surveys should be completed 6 months post occupation or on 50% occupation whichever is sooner.</p> <p>Reason: To promote travel by sustainable modes of transport in line with the London Plan 2021 and the Council's Local Plan SP7 and the Development Management DMPD Policy DM 32.</p> <p>3.0 Highway Improvements</p> <p>The applicant will be required to enter into agreement with the Highway Authority under Sections:</p>	

Stakeholder	Question/Comment	Response
	<p>278 of the Highways Act, to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements, improved pedestrian and cycling infrastructure. The developer will be required to provide details of any temporary highways including temporary TMO's required to enable the occupation of each phase of the development, which will have to be costed and implemented independently of the main S.278 works. The works include but are not limited to: Works on West Road and Brantwood Road for the reconstruction of the crossover and access to the site, the removal of on-street resident parking bays, and the reinstatement of the footways.</p> <p>The applicant will be required to provide a detailed design for including lighting improvements, details will also be required in relation to the proposed works including but not limited to: widening, including adoption and long-term maintenance, the drawing should include, existing conditions surveys construction details, signing and lining, the scheme should be design in line with the 'Healthy Streets' indicators perspective, full list of requirements to be agreed with the Highways Authority.</p> <p>The applicant will be required to submit detailed drawings and a Stage 1 and 2 road safety audit of the highways works for all elements of the scheme including the details of the footpath, these drawings should be submitted for approval before any development commences on site.</p> <p>Reason: To implement the proposed highways works to facilitate future access to the development Site and to protect the integrity of the highways network.</p> <p>4.0 Active Travel Improvements</p> <p>The applicant will be required to pay of sum of £25,000 (twenty-five thousand pounds) towards improvements to the walking and cycling environment be made to remedy these shortcomings found with the Healthy Streets Assessment and by doing so further improve conditions for active and sustainable modes accessing the site on the routes accessing the site.</p>	

Stakeholder	Question/Comment	Response
	<p>Reason: to improve accessibility to the site and promote travel by more sustainable modes of transport.</p> <p>5.0 Parking Management Contribution Given the history and issues experienced here a contribution of £40,000 (forty pounds) towards further future refinements and the upgrading Red-Route CCTV surveillance and on street parking enforcement at this location.</p> <p>Reason: to implement parking control mechanism in the area surrounding the site, to mitigate any parking impact generated by the proposal.</p>	
<b>Carbon Management</b>	<p>Carbon Management Response 06/08/2024</p> <p>After reviewing the initial submitted planning information, we have sent a request for clarifications and missing information on 30/05/24.</p> <p>We have reviewed subsequent additional information received on 06/06/24 and 24/06/24. We have further attended two meetings on 07/06/24 and 09/07/24 to discuss with the applicant, agent and their consultants.</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> <li>• Energy and Sustainability Statement prepared by Cudd Bentley Consulting (dated 01/05 2024)</li> <li>• BRUKL worksheets for Unit 1 and Unit 2 for Be Lean and Be Green scenarios.</li> <li>• GLA carbon emission reporting spreadsheet</li> <li>• BREEAM Pre-Assessment prepared by Cudd Bentley Consulting (dated 30/04/2024)</li> </ul>	<p>Support noted, subject to condition 16,15,18,31 and planning obligations secured via s106.</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>• Overheating Assessment / TM52 thermal comfort assessment by Cudd Bentley Consulting (revision 02 dated 21/06/24)</li> <li>• Sustainability and Landscape sections in Design and Access Statement by Chetwoods Ltd (Planning Issue PL2 dated April 2024).</li> <li>• Ecological Impact Assessment by Logika Group (dated 01/05/24).</li> <li>• Heat pump data sheet and proposed heat pump locations</li> <li>• Proposed district heating services layout drawing and evidence of conversation with Energetik</li> <li>• Written response to carbon queries raised in meeting 07/06/24 by Cudd Bentley Consulting (dated 24/06/24)</li> <li>• Relevant supporting documents.</li> </ul> <p>1. Summary The development achieves a reduction of 122% carbon dioxide emissions on site, which is supported in principle although we are seeking clarification on a number of key aspects that might affect this percentage reduction. The applicant is required to clarify their basis of their energy calculations in order to support their carbon dioxide reduction figures. Further clarifications must be provided with regard to the Energy Strategy and Sustainability Strategy. The Overheating Strategy must be reissued with the correct weather file and clarifications. Appropriate planning conditions will be recommended once this information has been provided.</p> <p>2. Energy Strategy Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L 2021). The London Plan (2021) further confirms this in Policy SI2.</p> <p>The overall predicted reduction in CO2 emissions for the development shows an improvement of approximately 100% in carbon emissions from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 18.2 tonnes of CO2 from a baseline of 16.3 tCO2/year.</p>	

Stakeholder	Question/Comment	Response																					
	<p>London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions in tCO2 are to be provided.</p> <p>Total regulated emissions (Tonnes CO2 / year)      CO2 savings (Tonnes CO2 / year)      Percentage savings (%)</p> <table> <tr> <td>Part L 2021 baseline</td> <td>16.3</td> <td></td> </tr> <tr> <td>Be Lean</td> <td>13.4</td> <td>2.9 18%</td> </tr> <tr> <td>Be Clean</td> <td>13.4</td> <td>0 0%</td> </tr> <tr> <td>Be Green</td> <td>-2</td> <td>15.4 94%</td> </tr> <tr> <td>Cumulative savings</td> <td>18.2</td> <td>112%</td> </tr> <tr> <td>Carbon shortfall to offset (tCO2)</td> <td>0</td> <td></td> </tr> <tr> <td>Carbon offset contribution</td> <td colspan="2">£95 x 30 years x 0 tCO2/year = £ 0</td> </tr> </table> <p>Actions:</p> <ul style="list-style-type: none"> <li>- The GLA Carbon Emission Reporting Spreadsheet is different from the table on p.9 of the Energy Strategy. We have assumed the GLA spreadsheet tables are the most correct, but please confirm and edit whichever figures are incorrect.</li> <li>- The applicant has confirmed the main warehouse spaces have been modelled as unheated as there is a low likelihood of heated warehouses being required. But the buildings will be future proofed to allow the warehouse spaces to be used as heated space in the future. The additional carbon emissions as a result of heating the warehouse spaces can be offset by adding further PV panels on roof.</li> </ul> <p>Energy Use Intensity (EUI) / Space Heating Demand (SHD) Applications are required to report on the total Energy Use Intensity (EUI) and Space Heating Demand (SHD), in line with the GLA Energy Assessment Guidance (June 2022). The Energy Strategy should follow the reporting template set out in Table 5 of the guidance, including what methodology has been used. EUI is a measure of the</p>	Part L 2021 baseline	16.3		Be Lean	13.4	2.9 18%	Be Clean	13.4	0 0%	Be Green	-2	15.4 94%	Cumulative savings	18.2	112%	Carbon shortfall to offset (tCO2)	0		Carbon offset contribution	£95 x 30 years x 0 tCO2/year = £ 0		
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	<p>total energy consumed annually, but should exclude on-site renewable energy generation and energy use from electric vehicle charging.</p> <p>Proposed Development      GLA Benchmark  Building type Industrial      All other non-residential  EUI    30.47 kWh/m2/year (unit 1)  44.74 kWh/m2/year (unit 2)      Both meet GLA benchmark of 55 kWh/m2/year  SHD    5.44 kWh/m2/year (unit 1)  18.69 kWh/m2/year (unit 2)      Unit 1 meets, and Unit 2 does not meet GLA  benchmark of 15 kWh/m2/year  Methodology used    SBEM / NCM</p> <p>Applicant has confirmed the EUI has included an allowance of assumed unregulated energy consumptions of the future tenants.</p> <p>Actions:</p> <ul style="list-style-type: none"> <li>-      Applicant to provide the unregulated energy for both units and to include the calculations and assumptions for the unregulated energy consumptions of the future tenants (e.g. kWh/m2?).</li> </ul> <p>Energy – Lean</p> <p>The applicant has proposed a saving of 2.9 tCO2 in carbon emissions (18%) through improved energy efficiency standards in key elements of the builds. This goes beyond the minimum 15% reduction set in London Plan Policy SI2, so this is supported.</p> <p>The following u-values, g-values and air tightness are proposed:</p> <p>Floor u-value 0.18 W/m2K  External wall and internal partition u-value      0.23 W/m2K  Roof u-value 0.15 W/m2K  Door u-value 1.60 W/m2K</p>	



Stakeholder	Question/Comment	Response
	<p>Window u-value 1.40 W/m<sup>2</sup>K (Glazing)  G-value 0.34  Air permeability rate 3 m<sup>3</sup>/hm<sup>2</sup> @ 50Pa  Ventilation strategy Extract system provided in WC  Strategies for main warehouse spaces and office TBC.  Low energy lighting LED lighting where applicable  Heating system (efficiency / emitter) Split system air conditioners within office areas.  Electric panel heaters within the WC and circulation area.  Electric point of use water heater (DHW)</p> <p>Heating demand  The actual heating demands are higher than the notional heating demands in both Be Lean and Be Green scenarios. Following a discussion with the applicant, we are questioning this further. The bullet points below set out our thought process behind this.</p> <p>Applicant explanation:  The applicant explained this is due to the proposed heating strategy is using electric panel heaters within the WC and corridors, and an electric panel heater has an actual efficiency of 100% which is less than notional efficiency of 134%.</p> <p>Council view:  The above explanation does not fully justify the higher heat demand in the actual building, which must be addressed.</p> <p>1. The ES states the office will be heated by ASHP. The WC and corridor will be heated by electric heating panels. In Be Green stage, the efficiency of the heat pump is higher than the notional value. Presumably the total area of offices is larger than WCs and corridors. So, the improvement of heating demand as a result of the higher efficiency of the heat pump should outweigh the lower efficiency of electric panel</p>	

Stakeholder	Question/Comment	Response																
	<p>heaters. Hence the actual heating demand should also be lower than that of the notional heating demand in Be Green stage.</p> <table><tr><td>Notional baseline</td><td>Be Lean</td><td>Be Green</td><td></td></tr><tr><td>Space heating systems efficiency (notional)</td><td>Efficiency used – actual building</td><td>Efficiency used in ES</td><td>Correct</td></tr><tr><td>Office Heat pump</td><td>264%</td><td>350%</td><td>264% 440%</td></tr><tr><td>WCs and corridors</td><td>Electric panel heater</td><td>134%</td><td>100% 134% 100%</td></tr></table> <p>2. The Energy Strategy and modelling has used incorrect efficiencies for the Be Lean scenario – see the table above that summarises the efficiency values. The efficiency values below are based on NCM table 7. The Be Lean efficiency values are the same as the notional efficiency values. The actual efficiency values will only be used in Be Green stage. (See paragraph 7.9 GLA guidance).</p> <p>3. The proposed building fabric has higher efficiency (e.g. U-values) in the Be Lean stage than the notional building. The proposed efficiency of the heating system is the same as the notional building within the current calculations. This means the actual heating demand should be lower than the notional heating demand.</p> <p>PV under Be Lean PV should not be taken into account under the Be Lean scenario. While there are certain PV panels assumed in the notional building, the same assumption will be applied to the actual building and so there should not be more PV in the actual building than the notional building.</p> <p>Overheating is dealt with in more detail below.</p> <p>Actions:</p> <ul style="list-style-type: none"><li>- Applicant to confirm if the ventilation strategy is natural ventilation for offices and main warehouse spaces. Applicant to confirm how the passive ventilation will work in big warehouse spaces with deep plans.</li></ul>	Notional baseline	Be Lean	Be Green		Space heating systems efficiency (notional)	Efficiency used – actual building	Efficiency used in ES	Correct	Office Heat pump	264%	350%	264% 440%	WCs and corridors	Electric panel heater	134%	100% 134% 100%	
Notional baseline	Be Lean	Be Green																
Space heating systems efficiency (notional)	Efficiency used – actual building	Efficiency used in ES	Correct															
Office Heat pump	264%	350%	264% 440%															
WCs and corridors	Electric panel heater	134%	100% 134% 100%															

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- Set out how the scheme's thermal bridging will be reduced. No measures are proposed to reduce heat loss from junction details, and it does not set out the what the proposed Psi (<math>\Psi</math>) value is.</li> <li>- Please factor in the efficiency of ASHP, not only the electric panel heaters in WCs and corridors.</li> <li>- Please correct the efficiencies of the systems in Be Lean to match the notional values.</li> <li>- Please remove the PV system from the Be Lean scenario.</li> <li>- Applicant to confirm if their assumptions of the energy modelling align with our understanding explained above. <ul style="list-style-type: none"> <li>o If so, please amend the BRUKL worksheets and energy statement.</li> <li>o If not, please explain the reasons clearly by addressing each point above.</li> </ul> </li> </ul> <p>Energy – Clean</p> <p>London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs.</p> <p>The applicant is not proposing any Be Clean measures. The application discusses the viability of future DEN connection with a DEN energy company Energetik. However, Energetik has confirmed it is not economically viable as extensions costs would exceed the return for them.</p> <p>Energy – Green</p>	

Stakeholder	Question/Comment	Response
	<p>As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.</p> <p>The application has reviewed the installation of various renewable technologies. The report concludes that split system heat pumps and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 15.4 tCO<sub>2</sub> (94%) reduction of emissions are proposed under Be Green measures.</p> <p>Solar photovoltaic (PV) panels  Peak output 260 kWp  Renewable electricity produced per year 182,000 kWh/year  Number of panels and roof area 694 panels; approximate roof area of 1,249 sqm  Battery storage capacity N/A - extra electricity produced from the PV panels will be fed back to the grid</p> <p>A 190 kWp system is required for unit 1, and a 70 kWp array is required for unit 2. Due to limited roof space atop unit 2, 31 kWp of the required 70 kWp has been achieved by adding additional capacity to the roof of unit 1. Applicant has maximised the PV installation to achieve 100% carbon reduction of currently modelled regulated emissions. The applicant confirmed during pre-application stages that the unregulated energy associated with the uses of the future tenant will be offset by additional PVs that future tenants can install. The proposal's roof structure will be designed to support the additional weight of the future PV panels.</p> <p>The communal air-to-air split system air conditioners (power inverter heat pump) have been proposed to provide heating to office areas. WCs and circulation areas will be heated by electric panel heaters. Hot water will be provided by electric water heater. More details have not been provided.</p> <p>Actions:</p>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- The data sheet of PKA-M R32 for the power inverter heat pump does not match the model number stated on the external condenser drawings. Applicant to clarify the product model. What is the Seasonal Coefficient of Performance (SCOP), the Seasonal Performance Factor (SFP) and Seasonal Energy Efficiency ratio (SEER) of the heat pump, and the mitigation measures in terms of visual and noise impact.</li> <li>- Applicant should develop a green lease agreement that tenants will be required to conform to, and which will secure the building services performance assumed. This should set out the requirements, as outlined by the applicant in a PPA meeting, that the future tenants will be responsible for installation of PV panels to offset their unregulated energy emissions. This will be conditioned.</li> <li>- Applicant to confirm if refrigerant is running in pipework between the external and internal of the heat pump units. Applicant to provide a maintenance strategy to ensure there is no leakage of refrigerant.</li> </ul> <p>Energy – Be Seen</p> <p>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.</p> <p>The units will be able to monitor their energy usage via metering equipment. All major items of plant equipment will be monitored, and the systems will be monitored to enable a minimum of 90% of the energy used in the building to be easily attributed to an end use. Electrical suppliers will be metered by smart meters.</p> <p>Actions:</p> <ul style="list-style-type: none"> <li>- Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development:</li> </ul>	

Stakeholder	Question/Comment	Response						
	<p>(<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform</a>)</p> <p>3. Carbon Offset Contribution There is no carbon shortfall. A section 106 agreement will require the recalculation of the carbon emissions at Energy Plan and Sustainability Review stages to confirm this. If a shortfall occurs in future, the remaining carbon emissions will need to be offset at £95/tCO2 over 30 years.</p> <p>4. Overheating London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.</p> <p>In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 Heathrow weather files. The report has modelled offices spaces in both units based on the scenarios with 1) active cooling and 2) passive measures and openable windows only.</p> <p>Results of 1) scenario of active cooling are listed in the table below.</p> <table><tr><td>Passive measures and openable windows only (no cooling)</td><td>Active cooling</td></tr><tr><td>Non-domestic: CIBSE TM52</td><td>Occupied hours &gt; Maximum Threshold</td></tr><tr><td>Occupied hours &gt; Maximum Threshold</td><td></td></tr></table> <p>DSY1 2020s Pass (for all offices)</p> <p>Pass (for all offices)</p>	Passive measures and openable windows only (no cooling)	Active cooling	Non-domestic: CIBSE TM52	Occupied hours > Maximum Threshold	Occupied hours > Maximum Threshold		
Passive measures and openable windows only (no cooling)	Active cooling							
Non-domestic: CIBSE TM52	Occupied hours > Maximum Threshold							
Occupied hours > Maximum Threshold								

Stakeholder	Question/Comment	Response
	<p>DSY2 2020s Pass (for all offices) Pass (for all offices)  DSY3 2020s Pass (for all offices) Pass (for all offices)  DSY1 2050s Not provided Not provided  DSY2 2050s Not provided Not provided  DSY3 2050s Not provided Not provided  DSY1 2080s Not provided Not provided  DSY2 2080s Not provided Not provided  DSY3 2080s Not provided Not provided</p> <p>All spaces pass the overheating requirements for 2020s DSY1 in both scenarios 1 using active cooling. In order to pass this, the following measures will be built:</p> <ul style="list-style-type: none"> <li>- Proposed U-values of the building fabric (see table under Be Lean)</li> <li>- Glazing g-value of 0.34</li> </ul> <p>Scenario 2 with passive measures and openable windows should be assessed with the same criteria of a naturally ventilated building, which is not the same as a mechanical ventilated building. The proposed building should at least pass 2 out of 3 criteria such as 1) hours of exceedance, 2) daily weighted exceedance and 3) supper limit temperature.</p> <p>A revised overheating strategy is required.</p> <p>Actions:</p> <ul style="list-style-type: none"> <li>- As requested in the pre-app advice note, please undertake the overheating modelling with the Central London weather file, which will more accurately represent the urban heat island effect.</li> <li>- Assess the scenario with passive measures and openable windows with the same criteria of a naturally ventilated building and table the result.</li> <li>- Demonstrate how the Cooling Hierarchy has been followed.</li> <li>- Specify the shading strategy, including: technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, external shutters), elevations and sections showing where these measures are proposed. Internal</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>blinds cannot be used to pass the weather files, but can form part of the delivered strategy to reduce overheating risk for occupants (as long as it does not compromise any ventilation requirements).</p> <ul style="list-style-type: none"> <li>- Active cooling should be the last resort. If active cooling is proposed, demonstrate strategy to minimise cooling demand as much as possible.</li> <li>- Specify the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m2 and MY/year? Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point / any renewable sources.</li> <li>- Please can you provide the results of DSY1 for the 2050s and 2080s. Ensure the design has incorporated as many mitigation measures to pass more extreme and future weather files as far as feasible. Any remaining overheating risk should inform the future retrofit plan.</li> <li>- Set out a retrofit plan for future and more extreme weather files, demonstrating how these measures can be installed, how they would reduce the overheating risk, what their lifecycle replacement will be, and who will be responsible for overheating risk.</li> </ul> <p>5. Sustainability</p> <p>Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the Design and Access Statement and the Energy and Sustainability Statement set out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design.</p> <p>Non-Domestic BREEAM Requirement</p> <p>Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.</p>	



Stakeholder	Question/Comment	Response
	<p>The applicant has prepared a BREEAM Pre-Assessment (Shell and Core) Report. Based on this report, a score of 76.60% is expected to be achieved, equivalent to 'Excellent' rating. A potential score of 88.43 % could be achieved which delivers an 'outstanding' rating with a 3.43% margin of contingency over the 85% target for an Outstanding BREEAM rating. This is supported.</p> <p>Urban Greening / Biodiversity</p> <p>All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff.</p> <p>The ecological impact assessment has stated the development is exempt from Biodiversity Net Gain due to the development not impacting any priority habitat and impacts less than 25m2 of on-site habitat. Despite the development is exempted from BNG, the landscape proposal has included new shrub, trees and wildflower grassland and green roofs with an aim to achieve BNG net gain of at least 10%.</p> <p>Greening and new trees have been proposed along the periphery of the development. Biodiverse roofs have been proposed on top of the bike sheds. Low level planting around seating areas will be provided to Unit 1 balcony.</p> <p>The development is proposing living roofs on top of the bike storage sheds. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep to ensure most plant species can establish and thrive and can</p>	

Stakeholder	Question/Comment	Response
	<p>withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. The living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition.</p> <p>Actions:</p> <ul style="list-style-type: none"> <li>- Further urban greening and biodiversity enhancement measures are encouraged (e.g. green infrastructure, bird boxes, bat boxes etc to connect to the green spaces around the site, living roofs, living walls, etc.).</li> <li>- The Arboricultural Impact Assessment has shown existing trees are to be retained on site. Existing trees should be clearly shown on the proposed landscape plans and all related planning information.</li> <li>- The width of the periphery green space is narrow, it might not be sufficient for the new trees to grow and mature. Applicant to demonstrate there are sufficient widths for the new trees to grow by showing the future tree crowns on the proposed site plans.</li> <li>- Applicant to propose planting details for the greening at the periphery. Access and maintenance should be carefully considered, particularly at the back of both units. This will be conditioned.</li> <li>- Details of the low-level planting on Unit 1 balcony will be conditioned.</li> </ul> <p>Whole Life-Cycle Carbon Assessments</p> <p>Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.</p> <p>This application is not required to submit a full statement. No reference has been made to reducing whole-life carbon within the proposed development. The applicant is strongly encouraged to consider using low-carbon materials, sourced as local as possible.</p> <p>Circular Economy</p>	

Stakeholder	Question/Comment	Response
	<p>Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.</p> <p>This application is not required to submit a full statement. No reference has been made to consider and integrate circular economy principles within the proposed development. The applicant is strongly encouraged to consider implementing circular economy principles, such as designing for disassembly and reuse.</p> <p>It is acknowledged that Asbestos might be present on site. The Remediation and Verification Strategy has highlighted a demolition asbestos survey report will need to be obtained prior to the demolition of the building.</p> <p>Actions:</p> <ul style="list-style-type: none"> <li>- Subject to the findings from the demolition asbestos survey report, applicant to confirm the suitability for volumes of material re-use and, if applicable, to demonstrate how the re-use of existing material has been maximised. This will be conditioned.</li> </ul> <p>6. Planning Conditions To be secured (with detailed wording TBC).</p> <ul style="list-style-type: none"> <li>• Energy strategy</li> <li>• Overheating</li> <li>• BREEAM Certificate</li> <li>• Living roofs</li> <li>• Biodiversity</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>7. Planning Obligations Heads of Terms</p> <ul style="list-style-type: none"> <li>- Be Seen commitment to uploading energy data</li> <li>- Energy Plan</li> <li>- Sustainability Review</li> <li>- Estimated carbon offset contribution (and associated obligations) of £0 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages.</li> </ul> <p>Carbon Management Response 23/08/2024</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> <li>• Response to Queries Raised by LBH Document, prepared by Cudd Bentley (dated 16/08/2024), including Be Lean and Be Green BRUKLs, GLA note, TM52 report (revised 21/06/24)</li> <li>• Energy and Sustainability Statement prepared by Cudd Bentley Consulting (dated 16/08 2024, Rev 04)</li> <li>• GLA carbon emission reporting spreadsheet</li> </ul> <p>Summary</p> <p>Energy - Overall</p> <p>The applicant confirmed that the Energy Strategy has been updated to reflect the correct information in the GLA carbon emission reporting spreadsheet. It appears that the baseline has come down from 16.3 to 9.5.</p> <p>To confirm, the development now achieves a 122% saving in regulated emissions from the baseline:</p>	

Stakeholder	Question/Comment	Response
	<p>Total regulated emissions (Tonnes CO2 / year)      CO2 savings (Tonnes CO2 / year)      Percentage savings (%)</p> <p>Part L 2021 baseline      9.5</p> <p>Be Lean      7.7      1.7      18%</p> <p>Be Clean      7.7      0      0%</p> <p>Be Green      -2.1      9.8      103%</p> <p>Cumulative savings      11.6      122%</p> <p>Carbon shortfall to offset (tCO2)      0</p> <p>Carbon offset contribution      £95 x 30 years x 0 tCO2/year = £ 0</p> <p>The unregulated energy has been calculated at: 24,492 kWh/year (Unit 1); 5,613 kWh/year (Unit 2), equivalent to 3.1 tCO2/year in total. Taking into account the additional savings in unregulated energy, the overall total emissions (regulated and unregulated) will only be 1 tCO2/year after the on-site savings.</p> <p>Energy – Be Lean The efficiency of systems has been amended in the Be Lean scenario. Ventilation through MVHR and opening windows is proposed. Low-Psi values have been proposed to reduce thermal bridging.</p> <p>The applicant has provided reference to the GLA guidance on how PV has been dealt with in Be Lean. We agree that the GLA stipulates that a PV system is present under Be Lean in the BRUKL report and that the GLA carbon emission reporting spreadsheet rectifies this by removing the PV from the Be Lean. However, we disagree with how the proposed PV system is dealt with under Be Lean. The image below shows that the actual PV systems generate higher amount of energy than the notional building; these amounts should be equal to the notional building in BRUKL.</p>	

Stakeholder	Question/Comment	Response
	<p>The GLA spreadsheet as attached also does not fill in the notional PV details in Column F, as requested by the GLA FAQ (attached in the appendix).</p> <p>Overheating</p> <ul style="list-style-type: none"> <li>- The London Weather File was used.</li> <li>- Passive measures have been included.</li> <li>- Shading strategy: tree planting, high-albedo materials, orientation, window placement, shading, reflective surfaces.</li> </ul> <p>The remodelled office areas with the correct weather files show that the spaces will pass based on both openable windows and active cooling. This means that active cooling is not required for the occupants and should not be used, subject to any acoustic or air quality constraints.</p> <p>Passive measures and openable windows only (no cooling) Active cooling  Non-domestic: CIBSE TM52 Occupied hours &gt; Maximum Threshold  Occupied hours &gt; Maximum Threshold</p> <p>DSY1 2020s Pass (for all offices) Pass (for all offices)  DSY2 2020s Pass (for all offices) Pass (for all offices)  DSY3 2020s Pass (for all offices) Pass (for all offices)</p> <p>Sustainability  The Urban Greening Factor has been calculated for both units:</p> <ul style="list-style-type: none"> <li>- Unit 1: UGF of 0.07</li> <li>- Unit 2: UGF of 0.05</li> </ul> <p>Actions:</p>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- Please explain why the baseline has been reduced downwards. We had previously already reported on the figures in the GLA Carbon Emission Reporting Spreadsheet.</li> <li>- Please amend the PV system under Be Lean to the notional values.</li> <li>- Please insert the PV generation details in the GLA carbon emission reporting spreadsheet.</li> <li>- Please submit the BRUKL reports that use a baseline with all notional specifications set out in Building Regulations Part L: Baseline, Be Lean, Be Green reports.</li> <li>- Please set out if there would be acoustic or air quality constraints to opening the windows as part of the overheating strategy.</li> </ul> <p>Conditions The following conditions are recommended to secure the benefits of the scheme. The Energy Condition is expected to be amended in the Addendum report, subject to the additional information required.</p> <p>Energy Strategy (to be amended with final figures) The development hereby approved shall be constructed in accordance with the Energy and Sustainability Statement by Cudd Bentley (dated 16 August 2024) delivering a minimum 122% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 260 kWp solar photovoltaic (PV) array and inverter capacity.</p> <p>(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:</p> <ul style="list-style-type: none"> <li>- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;</li> <li>- Confirmation of the necessary fabric efficiencies to achieve a minimum 18% reduction;</li> <li>- Details to reduce thermal bridging;</li> </ul>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- Confirmation of location, specification and efficiency of the proposed ASHPs and MVHR with plans showing the relevant pipework, and noise and visual mitigation measures;</li> <li>- Confirmation of PV details, 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); inverter capacity; and how the energy will be used on-site before exporting to the grid;</li> <li>- Specification of any additional equipment installed to reduce carbon emissions, if relevant;</li> <li>- A metering strategy.</li> </ul> <p>The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development.</p> <p>(b) The solar PV arrays and air source heat pumps must be installed and brought into use prior to first occupation of the relevant unit. Within 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, and an energy generation statement for the period that the solar PV array has been installed. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.</p> <p>(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.</p> <p>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in</p>	



Stakeholder	Question/Comment	Response
	<p>line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.</p> <p>Overheating The overheating mitigation measures should be implemented prior to the occupation of the relevant unit and be retained for the lifetime of the development to reduce the risk of overheating in habitable rooms in line with the Thermal Comfort Assessment prepared by Cudd Bentley (dated 21 June 2024) and Response to Queries Raised by LBH. This includes g-values of 0.34, tree planting, openable windows, high-albedo materials and window shading.</p> <p>Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.</p> <p>Living roofs (a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include: i) A roof plan identifying where the living roofs will be located; ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm); iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m<sup>2</sup> of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m<sup>2</sup>, rope coils, pebble mounds of water trays;</p>	

Stakeholder	Question/Comment	Response
	<p>v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m2) and density of plug plants planted (minimum 20/m2 with root ball of plugs 25cm3) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);</p> <p>vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</p> <p>vii) Management and maintenance plan, including frequency of watering arrangements.</p> <p>(b) Prior to the occupation of the unit, evidence must be submitted to and approved by the Local Planning Authority that the living roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.</p> <p>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</p> <p><b>BREEAM</b></p> <p>a) Prior to commencement on site for the relevant unit, a Design Stage Assessment and evidence that the relevant information has been submitted to the BRE for a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Excellent” outcome (or equivalent), aiming for “Outstanding”. This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.</p>	

Stakeholder	Question/Comment	Response
	<p>b) Within 6 months of commencement on site, the Design Stage Accreditation Certificate must be submitted. The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.</p> <p>c) Prior to occupation, the Post-Construction Stage Assessment and tool, and evidence that this has been submitted to BRE should be submitted for approval, confirming that the development has achieved at least a BREEAM “Excellent” outcome (or equivalent), aiming for “Outstanding”, subject to certification by BRE.</p> <p>d) Within 3 months of occupation, a Post-Construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.</p> <p>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.</p>	
<b>Waste Management</b>	<p>Thank you for contacting Haringey’s waste team regarding the above application for the demolition, clearance and redevelopment of 18 West Road and Unit 4 West Mews comprising 2no. warehouses (Use Class B2/B8) with ancillary mezzanine floorspace and associated landscaping, yard, parking, access and infrastructure at 18 West Road &amp; Unit 4 West Mews, Tottenham, London N17.</p> <p>Although we don’t have supplementary planning guidance for commercial waste, businesses must ensure all waste produced on site is disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system. We accept that commercial waste collection companies can provide up to twice daily collections, 7 days per week, however we would advise against sizing of the bins store and number of bins based on minimum size/number and maximum collections. The store should be sufficient space to store waste for at least 4 days.</p>	Noted, condition attached accordingly.

Stakeholder	Question/Comment	Response
<b>Pollution</b>	<p>Thank you for contacting the Carbon Management Team (Pollution) regarding the above application for the demolition, clearance and redevelopment of 18 West Road and Unit 4 West Mews comprising 2no. warehouses (Use Class B2/B8) with ancillary mezzanine floorspace and associated landscaping, yard, parking, access and infrastructure at 18 West Road &amp; Unit 4 West Mews, Tottenham, London N17 and I would like to comment as it relates to this service as follows.</p> <p>Having considered the relevant applicant submitted information including, Air Quality Assessment, with reference J30-15192A-10-F3, prepared by Logika Group, dated 1 May 2024, taking note of section 3 (Assessment Criteria), 4 (Assessment Approach), 5 (Baseline Conditions), 6 (Construction Phase Impact), 7 (Operational Phase Impact), 8 (Air Quality Neutral), 9 (Mitigation); Energy and Sustainability Statement with reference 6726-CBC-IC-RP-S-001-P04, prepared by Cudd Bently Consulting Ltd., dated 1 May 2024 taking note of the proposal to install an Air Source Heat Pump and Photovoltaic Panels; Geo-Environmental Assessment with reference 6726-CBC-IC-RP-S-001-P04, prepared by Delta-Simons Ltd., dated 1 May 2024 taking note of sections 3 (Conceptual Site Model), 4 (Ground Investigation), 5 (Ground Summary), 7 (Generic Quantitative Risk Assessment), 8 (Bulk Ground Gas Risk Assessment), 9 (Revised Conceptual Site Model), 10 (Conclusion &amp; Recommendations) and Appendices A-L; Remediation &amp; Verification Strategy with reference 106357.603623, prepared by Delta-Simons Ltd., dated 1 May 2024 taking note of 3 (Remediation Strategy), 4 (Pre-Construction Remedial Works), 5 (Construction Phase Remediation Works); Construction Environmental Management Plan prepared by Glencar Construction, dated 10 October 2018 and Draft Construction Logistics Plan prepared by TTP Consulting Ltd., dated April 2024, please be advised that we have no objection to the proposed development in respect to air quality and land contamination but the following planning conditions and informative are recommend should planning permission be granted.</p> <p>1. Land Contamination</p>	<p>Support noted &amp; conditions 4,5 and 6.</p>

Stakeholder	Question/Comment	Response
	<p>Before development commences other than for investigative work:</p> <p>a. 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.</p> <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>2. Unexpected Contamination</p> <p>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.</p> <p>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.</p> <p>3. NRMM</p> <p>a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NO<sub>x</sub> and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <a href="http://nrmm.london/">http://nrmm.london/</a>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.</p>	

Stakeholder	Question/Comment	Response
	<p>b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ</p> <p>4. Demolition/Construction Environmental Management Plans</p> <p>a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst</p> <p>b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.</p> <p>The following applies to both Parts a and b above:</p> <p>a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).</p> <p>b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:</p> <p>i. A construction method statement which identifies the stages and details how works will be undertaken;</p> <p>ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;</p> <p>iii. Details of plant and machinery to be used during demolition/construction works;</p> <p>iv. Details of an Unexploded Ordnance Survey;</p>	

Stakeholder	Question/Comment	Response
	<p>v. Details of the waste management strategy;</p> <p>vi. Details of community engagement arrangements;</p> <p>vii. Details of any acoustic hoarding;</p> <p>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</p> <p>ix. Details of external lighting; and,</p> <p>x. Details of any other standard environmental management and control measures to be implemented.</p> <p>c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:</p> <p>i. Monitoring and joint working arrangements, where appropriate;</p> <p>ii. Site access and car parking arrangements;</p> <p>iii. Delivery booking systems;</p> <p>iv. Agreed routes to/from the Plot;</p> <p>v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and</p> <p>vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and</p> <p>vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.</p> <p>d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:</p> <p>i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;</p> <p>ii. Details confirming the Plot has been registered at <a href="http://nrmm.london">http://nrmm.london</a>;</p> <p>iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;</p> <p>iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);</p>	

Stakeholder	Question/Comment	Response
	<p>v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate.</p> <p>The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.</p> <p>Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.”</p> <p>Informative:</p> <p>1.Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
<b>Flood &amp; Water Management</b>	<p>Thank you for re-consulting us on the above planning application reference number HGY/2024/1370 for the demolition, clearance and redevelopment of 18 West Road and Unit 4 West Mews comprising 2no. warehouses (Use Class B2/B8) with ancillary mezzanine floorspace and associated landscaping, yard, parking, access and infrastructure at 18 West Road &amp; Unit 4 West Mews , Tottenham, London N17.</p> <p>Having reviewed the applicant’s submitted :</p> <p>a) Flood Risk Assessment and Drainage Strategy document reference number Ref: 40130-BGL-XX-XX-RP-D-0001 Version V2 dated 2nd May 2024,</p>	<p>Support noted, condition 11 &amp; 12 attached.</p>



Stakeholder	Question/Comment	Response
	<p>b) Technical Note reference number 40130-BGL-XX-XX-TN-C-00001 dated 24th June 2024 in responses to comments from Consultees,</p> <p>c) Technical Note reference number 40130-BGL-XX-XX-TN-C-00001 – 01 Revision P01 dated 7th July 2024</p> <p>As prepared by Burrows Graham consultant, we have no further comments to make on the above planning application. We are satisfied that sufficient information have been received for assessing this full planning application. If the site is build, manage and maintain as per the above referred Flood Risk Assessment and Drainage strategy report along with recently submitted technical note, we are content that the impact of surface water drainage have been addressed adequately.</p>	
<b>Aboricultural</b>	<p>PP- HGY/2024/1370</p> <p>Location- 18 West Road &amp; Unit 4 West Mews , Tottenham, London N17</p> <p>Proposal- Demolition, clearance and redevelopment of 18 West Road and Unit 4 West Mews comprising 2no. warehouses (Use Class B2/B8) with ancillary mezzanine floorspace and associated landscaping, yard, parking, access and infrastructure</p> <p>From an arboricultural point of view, I hold no initial objections to the above proposal.</p> <p>An arboricultural survey and arboricultural impact statement has been submitted by arbtech and is dated May 2024. The report has been carried out to British Standard 5837: Trees in relation to design, demolition and construction 2012-Recommendations.</p> <p>I concur with much of the report including the tree category classification.</p> <p>No photographs have been supplied for the trees on the east boundary of Unit 1 however, from the descriptions these are assumed to be low grade self-sets.</p> <p>We would request photographs are supplied for these trees as they do appear to form an existing screen to the adjacent properties.</p> <p>It is stated that a Biological Net Gain is not required and that the site will have a 10% net gain (bare minimum that is required).</p>	<p>Noted.</p> <p>Condition 29 &amp; 27 attached.</p>

Stakeholder	Question/Comment	Response
	<p>Tree planting consists of suitable species for the site (Ulmus, Prunus and Acer spp.) along with seating areas, green roofs, insect hotels, shrub, and ground cover planting.</p> <p>It is noted that the north boundary has no line of tree planting throughout the proposed ground cover. This boundary with planted suitable trees would make a large significant impact, screen the transport depot, break the line of the structure, add to the canopy cover, add to the many benefits that trees provide, and allow pleasant views from the office windows for the staff. The same can also be same for the bottom west corner and the south boundaries of the curtilage of the proposed site.</p> <p>Any landscape plan will also require an aftercare programme to establish independence within the landscape.</p> <p>The above needs to be considered and addressed. We also request that photographs are supplied for the trees on the east boundary.</p>	
<b>Noise</b>	<p>HGY/2024/1370 - 18 West Road &amp; Unit 4 West Mews Tottenham London N17 Demolition, clearance and redevelopment of 18 West Road and Unit 4 West Mews comprising 2no. warehouses (Use Class B2/B8) with ancillary mezzanine floorspace and associated landscaping, yard, parking, access and infrastructure.</p> <p>Commentary I have reviewed the Noise Impact Assessment provided for the above development (ref: 15192A-20-R01-03-F) and provide the following:</p> <p>The assessment undertaken is acceptable in principle, but further assessment is required once the site is occupied to ensure that HGVs servicing the units do not cause problem noise at noise sensitive times such as might be caused by numerous vehicle movements or reversing alarms. The Transport assessment has been undertaken to assess movements between 0700 and 1900 and further consideration of the potential impacts of vehicle movements outside these times will need to be included.</p>	Noted, conditions 21,29 & 30 attached.

Stakeholder	Question/Comment	Response
	<p>Whilst I appreciate the hours for use of the units cannot be confirmed at this stage, it would be helpful to understand, manage and control activities that are likely to cause nuisance at noise sensitive times. It is suggested in the document if these will be considered as “Other” and mitigation for these cannot be specified until the franchisees / unit operators are in place. The persons with overall control for the units should be required to devise a Noise Management Plan for all units which would address issues like – delivery times, delivery controls such as use of noisy equipment and personnel, alarms and roll cages, waste management etc.</p> <p>The NMP should also include how noise complaints will be managed, a process of review in the event a significant number of complaints are substantiated, how and when the yard area will be used during noise sensitive times, activities restricted during noise sensitive times and any other controls will they implement to limit the potential for neighbour disturbance. This will need to be approved by the Local Planning Authority before implementation.</p> <p>Conditions:</p> <ol style="list-style-type: none"> <li>1. Prior to the occupation of the site hereby approved, a Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority. This plan shall specify where delivery vehicles servicing the units shall park, how deliveries are received and how goods and materials shall be delivered. The approved Delivery and Servicing Plan shall be implemented in full for the duration of this site use, unless otherwise agreed by the Local Planning Authority.</li> <li>2. The site shall be operated so that the level of noise from plant equipment does not exceed the levels outlined in the noise impact assessment (ref: ref: 15192A-20-R01-03-F, dated 1st May 2024) namely, that it will not exceed 5dB below the measured LA90 background noise level at the nearest residential windows at any time.</li> <li>3. Prior to the commencement of the use or within a timetable as agreed with the Local Planning Authority, tests shall be carried out to verify compliance with these levels and the results of these tests shall be submitted to and approved in</li> </ol>	

Stakeholder	Question/Comment	Response
	<p>writing by the Local Planning Authority. If the specified levels have been exceeded, details of the measures which will be taken to remedy this breach will be submitted to and approved in writing by the Local Planning Authority and implemented in full prior to the commencement of use of the development.</p> <p>4. A detailed Noise Management Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the use agreed and shall include, but is not limited to, details of all noise management controls to be implemented to limit the potential for neighbour disturbance.</p>	
<b>Inclusive Economy</b>	<p>Within the borough's Inclusive Economy Framework 'Opportunity Haringey' under the theme of 'High Streets and Industrial Estates' we recognise that Haringey's industrial estates are significant employment locations in the borough and are the home of some of Haringey's largest companies. Encouraging investment in industrial estates, including those in our own commercial portfolio, supports their vitality which will then in turn stimulate entrepreneurialism and job creation.</p> <p>We welcome the plans to retain and enhance employment space in an industrial estate in need of improvement. In supporting this application we would be keen to work closely with the developer and their contractors/suppliers to maximise the benefits of local jobs and training on any construction programme, as well as explore the green skills ambitions and circular economy opportunities that a modern industrial development can bring. Similarly we would be keen to work with the end-use tenants of the development, where the applicant states that 133 jobs will be created, to maximise benefits to local people through Haringey Works and Haringey Learns and by signposting businesses to support available in the borough"</p>	Support noted. Skills contribution will be secured via s106.
<b>EXTERNAL</b>	<p>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.</p>	Noted informative attached.

Stakeholder	Question/Comment	Response
	<p>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.</p> <p><a href="https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes">https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes</a></p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.</p> <p><a href="https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes">https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes</a> Should you require further information please contact Thames Water.</p> <p>Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a> Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p>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</p>	

Stakeholder	Question/Comment	Response
	<p>activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.</p> <p>Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Water Comments</p> <p>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.</p> <p><a href="https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes">https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes</a></p> <p>On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>	
<b>Design crime by</b>	With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see	Noted and condition 14

Stakeholder	Question/Comment	Response
	<p>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 have not met with the original project Architects to discuss Crime Prevention and Secured by Design at pre-application stage to discuss our concerns around the design and layout of the development. There is no mention of crime prevention or Secured by Design in the Design and Access Statement referencing design out crime or crime prevention. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early stage. At this point it can be difficult to design out fully any issues identified, at best crime can only be mitigated against, as it does not fully reduce the opportunity of offences. Whilst in principle we have no objections to the site, in light of the changes to the original design we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p>Section 2 - Secured by Design Conditions and Informative:  In light of the information provided, we request the following Conditions and Informative:  Conditions:</p> <p>A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable according to</p>	<p>&amp; 15  attached.</p>

Stakeholder	Question/Comment	Response
	<p>current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development.</p> <p>The development shall only be carried out in accordance with the approved details.</p> <p>B. Prior to the first occupation of each building, or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.</p> <p>Reason: In the interest of creating safer, sustainable communities.</p> <p>Informative: The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk</p> <p>Section 3 - Conclusion:</p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p> <p>Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.</p> <p>This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of</p>	



Stakeholder	Question/Comment	Response
	<p>accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.</p> <p>With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. 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 have not met with the original project Architects to discuss Crime Prevention and Secured by Design at pre-application stage to discuss our concerns around the design and layout of the development. There is no mention of crime prevention or Secured by Design in the Design and Access Statement referencing design out crime or crime prevention. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early stage. At this point it can be difficult to design out fully any issues identified, at best crime can only be mitigated against, as it does not fully reduce the opportunity of offences. Whilst in principle we have no objections to the site, in light of the changes to the original design we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p>Section 2 - Secured by Design Conditions and Informative:</p>	

Stakeholder	Question/Comment	Response
	<p>In light of the information provided, we request the following Conditions and Informative:</p> <p>Conditions:</p> <p>A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable 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.</p> <p>The development shall only be carried out in accordance with the approved details.</p> <p>B. Prior to the first occupation of each building, or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.</p> <p>Reason: In the interest of creating safer, sustainable communities.</p> <p>Informative:</p> <p>The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk</p> <p>Section 3 - Conclusion:</p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p>	

Stakeholder	Question/Comment	Response
	<p>Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.</p> <p>This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.</p>	
<b>Transport for London</b>	<p>Thank you for consulting TfL Spatial Planning, and apologies for the delayed response.</p> <p>Given the location of the scheme away from TfL highways and assets we have no significant comments to make. We'd welcome measures to improve access and footways immediately around the sites, and on access routes to the site.</p> <p>Please feel free to contact me if you have any queries with which I can assist. Otherwise TfL would not object to permission being granted.</p>	<p>Support noted and improvement works have secured via s.106.</p>

Stakeholder	Question/Comment	Response
<b>Local resident</b>	I would like to object to a new building on 18 west road & unit 4 West Mews, Tottenham N17 for the following reasons:	

Stakeholder	Question/Comment	Response
	<p>There will be a direct impact on my living standards. The existing building overlooks my back garden, it is metal and has no windows.</p> <p>I am concerned that the new building will include windows which will be an infringement of my privacy rights. I do not want anyone to have direct access to overlook my garden. I also object to the loss of light in the garden and the back of my house.</p> <p>There will be a major impact on traffic, parking and road safety as there will be an increase in vehicles in the area. It is difficult enough with the HGVs in the area and increasing these will cause more accidents. HGVs have already caused major damages to our houses on Willoughby lane when they caught the telephone poles and pulled down cables from houses, causing damage to my roof, which was not fixed by the company operating on Brentwood road. Furthermore, a part of the roof on a neighbours house was pulled down landing on their car, smashing the windscreen.</p>	<p>No windows are proposed to the rear addressed para 6.9.8 No windows are proposed to the rear.</p> <p>Noted, There is no control over accidents from happening. However, transport assessment data demonstrates that, although there is higher number HGV movements across the day, there is relatively few movement during</p>

Stakeholder	Question/Comment	Response
	<p>There will be a detrimental effect on the appearance and character in the area.</p> <p>I am very concerned about the noise and disturbances that a new building will cause. This will result in more people in the area and it is difficult enough living here due to the many factories here.</p> <p>We are a residential road which has been surrounded by trade companies. They have no consideration for the residents and fly tipping is an issue (hazardous waste from the factories). Yet another development in the area will result in more mess and yet more air pollution.</p>	<p>weekday, morning and evening peak hours. Conditions has been attached. Design of building is acceptable addressed in para 6.3.2</p> <p>Noted – addressed in para 6.9.16</p> <p>Noted. Condition has been attached waste and recycling.</p>

## **Appendix 4: Quality Review Panel**

### **London Borough of Haringey Quality Review Panel Report of Formal Review Meeting: 18 West Road and Unit 4 West Mews**

Wednesday 6 March 2024

Alexandra House, 10 Station Road, London N22 7TY

#### **Panel**

Peter Studdert (chair)

Rosie Bard

Hugo Braddick

Angie Jim Osman

Linsey Whitelaw

#### **Attendees**

Sarah Madondo London Borough of Haringey

Bioplav Pagéni London Borough of Haringey

Tania Skelli London Borough of Haringey

Richard Truscott London Borough of Haringey

Kirsty McMullan Frame Projects

Bonnie Russell Frame Projects

#### **Apologies / report copied to**

Suzanne Kimman London Borough of Haringey

Rob Krzyszowski London Borough of Haringey

Robbie McNaugher London Borough of Haringey

John McRory London Borough of Haringey

Elizabetta Tonazzi London Borough of Haringey

Bryce Tudball London Borough of Haringey

#### **Confidentiality**

This is a pre-application review, and therefore confidential. As a public organisation Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

Report of Formal Review Meeting 6 March 2024 HQRP141\_18 West Road & Unit 4 West Mews

### **1. Project name and site address**

18 West Road & Unit 4 West Mews, Hotspur Industrial Estate, London N17 0RE

#### **1. Presenting team**

Max Freeman Valor

Rupert Crossland Valor

Andrew Murdoch TTP Consulting

Philip Stanway Chetwoods

James Guthrie Quod

Hannah Hiscock Quod

### **3. Planning authority briefing**

The site sits within an established industrial and commercial area comprising predominantly single storey warehouses of varying ages and footprints, with associated yard spaces. No.18 West Road and Unit 4 West Mews are two parcels of land to the eastern side of West Road. The first parcel abuts Brantwood Road and comprises two buildings at the northern end of West Road. The second parcel is located 100 metres to the south of this, and is a smaller site.

The sites are both within Flood Zone Two, in a designated Strategic Industrial Location. They are also within the Tottenham Area Action Plan and an Archaeological Priority Area. The PTAL rating is two: poor access to public transport services. There are two bus services available within a six-minute walk of the site, and Northumberland Park Station is a nine-minute walk away.

The applicant is proposing two industrial warehouse units with ancillary office spaces and associated parking and servicing. Unit One, located at 18 West Road, will be circa 5,600 sqm (gross external area) and positioned in the southern section of the site. It will have a service yard to the north, accessed from Brantwood Road. Unit Two, located at Unit 4 West Mews, will be approximately 970 sqm (gross external area) and will be positioned in the eastern portion of the site, with a service yard accessed from West Road.

Officers support the principle of intensifying industrial sites. However, officers would welcome the panel's views on the impact of the scheme on neighbouring residential buildings, connectivity and access, site layout, landscape, biodiversity and ecology, employee amenity spaces, sustainability, and low carbon design.

Report of Formal Review Meeting 6 March 2024 HQR141\_18 West Road & Unit 4 West Mews



#### **4. Quality Review Panel's views**

##### *Summary*

The Haringey Quality Review Panel supports the principle of the proposed development, and commends the plan to improve the industrial and logistics offer in the area. It makes suggestions to help enhance the quality of proposals for units and the overall site.

The height of Unit One will be overbearing for the residents of Willoughby Lane, blocking their evening light and increasing the area of blank façade they will look onto. The panel asks that the roofline is lowered, and the proposals tested in cross sections, to alleviate the impact on neighbours. The site layouts work well, but not enough thought has been given to the health and wellbeing of employees. A green space should be provided for them to take breaks outdoors. The landscaping proposals are not yet realistic or ambitious enough. Landscaped areas appear likely to become shortcuts, collect rubbish, and be difficult to maintain. A much more significant landscaping contribution is required to resolve these issues and improve the experience of the public realm. Some commercial space, whether yard or internal, will need to be sacrificed to achieve this, but could be regained by extending the mezzanine levels. Reuse of existing materials on the sites, design for adaptation and disassembly, low carbon materials, permeable paving and social value considerations will all improve the scheme's longevity, making it a regenerative rather than just a sustainable development. Lightweight green roof products should be explored for the benefits they will bring in mitigating temperatures and increasing biodiversity. In the panel's view, the architecture and materiality should be clean, simple, and well-detailed. The two warehouses could be treated slightly differently as a response to their respective sites.

##### *Height and massing*

- The massing developed for both units is appropriate for industrial use, but the panel is concerned that the height of Unit One will have an overbearing impact on houses in Willoughby Lane, backing onto the eastern edge of the site.
- The panel understands that the scheme currently passes the Building Research Establishment's minimum sunlight requirements, and is a reasonable distance away from neighbouring houses. However, this proposal will be double the height of the existing building, and is therefore likely to block the evening light that the back gardens currently receive for some of the year. It will also not improve the residents' outlook by extending the area of blank façade they will see.
- From the perspective of being a good neighbour, the panel strongly encourages the project team to scrutinise cross sections through Unit One and the houses on Willoughby Lane. It asks that the roof of Unit One is lowered to ameliorate the impact on these residents, and that the views from resident gardens are also checked.

Report of Formal Review Meeting 6 March 2024 HQRP141\_18 West Road & Unit 4 West Mews

### *Industrial workspace design*

- The site layout of Unit One is logical, as it allows heavy goods vehicles to turn off Brantwood Road into the yard. The site layout of Unit Two, on a more constrained site, is also sensible. However, with both units there are some opportunities for enhancement.
- The health and wellbeing of employees should be properly accommodated. It is predicted that approximately 80 employees will work across the two sites. In the panel's view, a more meaningful effort should be made to provide a pleasant space for them to take breaks outside.
- Some commercial space would need to be sacrificed to make space for more landscaping, but this could be regained by extending the mezzanine levels internally. The panel notes that online retailer, online supermarket, or third-party logistics tenants have an increasing need for ancillary office space, which could be provided in such upper mezzanine levels.
- Alternatively, the mezzanines could extend further, over part of the yards. If adequate security arrangements can be made for undercroft parking to work, the panel encourages the project team to test this model.

### *Landscape and biodiversity*

- The panel advises the newly-appointed landscape architect to interrogate the proposals as soon as possible, to test whether the landscape designs can be delivered.
- There are several issues with the current proposals. Firstly, the narrow strips of greenery around the parking for Unit One are likely to become trampled as people use them for shortcuts. Secondly, the curtilage of greenery between the buildings and the paladin fences at the back of both sites is unlikely to be well maintained, and could gather rubbish. Thirdly, the suggested rain gardens or SuDS will need to be integrated into the drainage network to be successful.
- The panel asks for a more meaningful landscape offer along the street frontages, providing green spaces for employees and contributing to the public realm. This may require some sacrifice or reconfiguration of commercial yard or floorspace, but it would make a significant difference to the streetscape in a hard, urban environment.
- In the panel's view, it is also not sufficient to target ten per cent biodiversity net gain when the site is starting from zero. These sites should offer substantial planted zones, including trees, which could be used to mark entrance routes. This would soften the arrival experience, and bring more biodiversity and delight to the proposals.
- There may be areas that do not impact on vehicle tracking in the yards and could be greened. The panel suggests using structural tree soil. This is much

Report of Formal Review Meeting 6 March 2024 HQRP141\_18 West Road & Unit 4 West Mews

- , and saves space because vehicles can drive over it.
- The panel suggests pushing the units as far back into the sites as possible, so that the external walls become the security line, rather than paladin fencing and uncared for greenery. The two electricity substations could also be consolidated into one building elsewhere to optimise space.
- The project team should put more thought into how the landscaping will be maintained, providing a maintenance plans. Solutions could include ideas such as low brick walls, to prevent rubbish from drifting into the planting, reducing the maintenance workload.

### *Sustainability*

- The panel agrees that high-quality design ensures longevity and is part of a good sustainability strategy. To go beyond sustainability and achieve a regenerative design, more should be on offer in terms of social value, biodiversity, health and wellbeing.
- The project team should continue to develop the scheme to reduce carbon. Choices should be informed by materials and components that are easy to adapt or disassemble, for example, the mezzanine structures should be designed for future extension.
- Existing materials on the two sites should be reused where possible. Larger steels may not be in a suitable condition for reuse as they are, but could be cut down and used for shorter spans elsewhere.
- The panel is pleased to hear that sedum roofs have been ruled out due to fire safety concerns, as the species are frequently not native to the UK. However, it encourages the project team to investigate green roofs wherever possible. These can create an ecologically rich surface that works in combination with solar panels, helping to mitigate the urban heat island effect, and adding a layer of insulation. The panel understands the insurance challenges, but notes that this would also reduce reliance on mechanical systems to maintain a comfortable internal environment.
- The project team should also explore the use of lightweight green roof products that can create an insulating, wet roof wildflower meadow, and so do not pose a fire risk.

### *Architecture*

- In the panel's view, it is preferable to employ a clean, simple architectural approach, using steel cladding, and to focus on the quality of the detailing rather than adding extra materials such as brick. It also notes that the more complex the building, the harder it will be to maintain or adapt for future needs.

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- The façade of Unit One included a glazed corner in response to the cut-out corner of the floorplan and the corner of West Mews and West Road, but this detailing is repeated in Unit Two, where there is no cut-out or street corner. The panel suggests that the two warehouses should be treated differently in response to the slight variations in their settings.
- The panel also favours a simple approach rather than using colour to break up the massing. It suggests that there is a designated, protected space for integrated signage on the façades.

*Next steps*

- The Haringey Quality Review Panel would welcome the opportunity to review the proposals again at a chair's review, once a landscape design has developed sufficiently.