

## REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

### 1. APPLICATION DETAILS

**Reference No:** HGY/2024/1203

**Ward:** Bruce Castle

**Address:** 39 Queen Street, N17 8HZ

**Proposal:** Redevelopment of Site for industrial and warehousing purposes (within Use Classes E(g)(ii), E(g)(iii), B2 and B8, with ancillary office accommodation together with access, service yard, car and cycle parking, landscaping, construction of a new substation, boundary treatments and other related works including demolition.

**Applicant:** Verity Trustees Limited

**Ownership:** Private

**Case Officer Contact:** Sarah Madondo

**Date received:** 26/04/2024

**Last amended date:** 11/10/2024

**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 Locally Significant Industrial Site (LSIS).
- The proposed development would increase the existing floor space by approximately 2,122 sqm, creating a total 7,258 sqm of flexible employment floorspace.
- The proposed scale and design of the development is appropriate within the context of the site and is considered of good quality, making a positive contribution to the visual amenity of the area.
- The development would provide a sufficient number of car and cycle parking spaces, which would encourage sustainable transport initiatives and include appropriate mitigation measures to minimise impacts upon the public highway.

### **2. RECOMMENDATION**

**2.1** That the Committee authorise the Interim Head of Development Management & Planning Enforcement or the Assistant Director of Planning, Building Standards & Sustainability to **GRANT planning permission** subject to the conditions and informatives set out below and the completion of a legal agreement satisfactory to the Interim Head of Development

Management & Planning Enforcement or the Assistant Director of Planning, Building Standards & Sustainability, that secures the obligations set out in the Heads of Terms below following Stage II referral to the GLA.

- 2.2 That the legal agreement referred to in resolution (2.1) above, is to be completed no later than 3 months from the date of the Planning Sub-Committee meeting or within such extended time as the Assistant Director Planning, Building Standards & Sustainability/ Interim Head of Development Management & Planning Enforcement 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 Interim Head of Development Management & Planning Enforcement or the Assistant Director Planning, Building Standards and Sustainability, to make any alterations, additions or deletions to the recommended measures and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee.

#### Summary Lists of Conditions, 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. Delivery and Servicing Plan
8. Cycle Parking
9. Electric Vehicle Charging
10. Disabled Parking Bays
11. Car Parking Management Plan
12. Energy Strategy
13. Overheating
14. Living roofs
15. BREEAM
16. Biodiversity measures
17. Secured by Design Accreditation
18. Secure by Design Certification
19. External lighting
20. Boundary treatment
21. Section 278
22. Hard and soft landscaping works

23. Tree protection
24. Noise Management Plan
25. Plant Noise
26. Waste and recycling
27. Restrictive uses classes
28. Urban Green Factor
29. Decentralised Energy Networks
30. Drainage Management and Maintenance

### **Informatives**

- 1) CIL liable
- 2) Hours of construction
- 3) Party Wall Act
- 4) Street Numbering
- 5) Sprinklers
- 6) Thames Water
- 7) Asbestos
- 8) Secure by design
- 9) Land ownership
- 10) NPPF
- 11) Pollution
- 12) Advertisement

### **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; and
- DEN connection.

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

- The developer is required to pay a sum of £3,000 per year per unit (3 units), for the travel plans, for a period of 5 years at total of £45,000.

#### **3. Employment Initiatives - participation and financial contribution towards Local Training and Employment Plan**

- Apprenticeship support fees of £1,500;
- The provision of not less than twenty percent (20%) of the workforce employed during the Construction Phase of the relevant Unit to comprise Residents each of whom shall be so employed for a minimum of 26 weeks;
- 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;
  - One full time apprenticeship per £3million of development cost (up to max). 10% of total construction workforce; and
  - Provision of financial contribution £56,417.76 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
- S.278 Highways Works to include but are not limited to:
    - Improvement to the roundabouts at the junction of White Hart Lane with Selby Road and the Junction of White Hart Lane with Creighton Road;
    - Parking and layout and carriageway improvement to the section on White Hart Lane between the junction to White Hart Lane/ Junction with Selby Road to the proposed site and or improvements to White Hart Lane from the junction with Creighton Road to the proposed site;
    - Reinforcement/resurface of the crossover and carriageway on Queen Street to provide access to the site;
    - The strengthening of the site's vehicle crossover to allow for an increase in HGV movements;
    - Reconstruction of footways nearby to the site to mitigate deterioration caused by the development; and
    - Resurfacing of the carriageway outside of the site to ensure that the road network can support the increase in trips by HGVs.
6. Monitoring Contribution
- 5% of total value contribution (not including monitoring);
  - £500 per non-financial contribution; and
  - 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 agreed time period, set out in (2.2) 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 Interim Head of Development Management & Planning Enforcement (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 or Interim Head of Development Management & Planning Enforcement 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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### **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 and redevelopment of site for industrial and warehousing purposes (within Use Classes E(g)(ii), E(g)(iii), B2 and B8, with ancillary office accommodation together with access, service yard, car and cycle parking, landscaping, construction of a new substation, boundary treatments and other related works.
- 3.1.2. The development proposals seek to make more efficient use of the site by redeveloping it, to provide three separate commercial units. The units proposed are two-storeys in height with a combined floor area of 7,258 sqm (GEA). The proposed height of the units will range between 11.6 metres to 13.5 metres. The clear internal heights for Units 1 and 2 would be 8 metres, with 10 metres for Unit 3.



Image 1: Arial view - The site

#### **3.2 Site and Surroundings**

- 3.2.1 The site is located on Queen Street and lies adjacent to the boundary with the London Borough of Enfield. The site is accessed from Queen Street and has a dedicated entrance. There is an existing building on the site, which is proposed to be demolished. The existing building on the site is currently occupied by Booker Wholesale and has a total floor area of 5,136 sqm existing floorspace. The site is well located to access the A406 North Circular to the north and the A10 in the south. The site is also located in proximity to White Hart Lane London Overground.

- 3.2.2 The site lies in Flood Zone 1 as defined by the Environment Agency Flood Map for Planning, which is considered to be an area with a low probability of flooding from rivers and the sea. There are no listed buildings or scheduled monuments located on the site and the site is not located in any Conservation Area or a Registered Park or Garden.
- 3.2.3 To the immediate east of the site are existing industrial units and to the west is the Selby Centre, which is a multi-purpose community centre. Further west of the Selby Centre is the Wier Hall Road Community Open Space and Sport Fields, as well as the March Wood Outdoor Learning Centre. There is also open space located to the immediate north of the site, Bull Lane Playing Fields and Cricket Pitch, which are located within the boundaries of London Borough of Enfield.
- 3.2.4 The Devonshire Hill Nursery and Primary School is located to the southwest of the site, adjacent to the Selby Centre. To the northeast of the site at Bull Lane and Commercial Road are significant further industrial uses, which are located within the London Borough of Enfield.
- 3.2.5 There are also a range of residential uses that neighbour the site, most notably at Allington Avenue where the site backs on to the rear gardens of numbers 34 - 62 (even only) Allington Avenue. There is an existing two-metre high concrete panel fence that forms a boundary between the south of the site and the residential properties.



Image 2: Birds Eye View of Existing site and residential properties North Facing.

- 3.2.6 The proposal site has a Public Transport Accessibility Level (PTAL) rating of 2-3 indicating that its access to public transport is reasonably good. The site is located within the Northumberland Park West CPZ that restricts parking to permit holders Monday to



Saturday 08:00 - 20:00, with further restrictions when events are taking place at the Tottenham Hotspur Stadium. However, it should be noted that the Tottenham Event Day CPZ operates in nearby streets, with restrictions not operating when events are not on.



Image 3: Site location Plan

### 3.3 Relevant Planning History

- 3.3.1 OLD/1982/1263 - 39 Queen Street N17: Erection of single storey wholesale Cash & Carry warehouse and delivered trade warehouse with ancillary office for Booker Belmond Limited. **Granted**
- 3.3.2 HGY/2007/1147 - 39 Queen Street N17: Variation of Condition 3 (parking) attached to planning permission reference HGY/25211 to allow Middlesex University Hospital NHS Trust to temporarily use 90 spaces between the hours of 8.00 and 20.00 Monday to Friday and 8.00 and 13.00 on Saturdays for 3 years. **Granted**
- 3.3.3 HGY/2006/1462 - 39 Queen Street, London, N17: Variation of Condition 3 (parking) attached to planning permission reference HGY/25211 to allow the temporary use of ancillary car parking spaces by North Middlesex University NHS Hospital Trust for 3 years. **Granted**

### 4.0 CONSULTATION RESPONSES

#### 4.1 Application Consultation

- 4.1.1 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 conditions and obligations.
- 2) LBH Carbon Management: No objection, subject to conditions and obligations.
- 3) LBH Waste Management: No objection, subject to condition.
- 4) LBH Building Control: No comments received.
- 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 conditions.
- 7) LBH Economic Regeneration: No objection, subject to conditions.
- 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.
- 16) London Borough of Enfield: No objection.

**5.0 LOCAL REPRESENTATIONS**

5.1 The following were consulted:

Neighbouring properties:

Site notices were erected in the vicinity for 21 days.

5.2 No representations were received from neighbours, local groups etc in response to notification and publicity of the application.

## **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. Impact on amenity of neighbouring properties;
4. Parking and highway safety;
5. Energy and climate change;
6. Urban Greening, Trees and Ecology/Biodiversity;
7. Flood risk and drainage;
8. Air Quality;
9. Waste and recycling;
10. Employment and Training;
11. Fire Safety and
12. Conclusion.

### **6.2 Principle of the development**

6.2.1 The site is designated as a Locally Significant Industrial Site (LSIS) (DEA7 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 of industrial uses. The policy states that 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 Specifically for Locally Significant Industrial Sites (LSIS) which this site falls within, Policy SP8 states the Council will safeguard LSIS for a range of industrial uses where they continue to meet demand and the needs of modern industry and business.

6.2.7 Policy DM37 Part A of the Development Management DPD states that, within SIL, LSIS (this site) and LEA employment 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;
- Allows for future flexibility for a range of business types and sizes;
- Provides adequate space for on-site servicing and vehicle waiting/ movements; and
- Improves and enhances the quality of the local environment and business area; and
- Demonstrably improves the functionality of the site for employment proposes including improvements in the quality/type of employment space, quality/density of jobs on-site and the site's contribution to the Council's wider employment objectives.

6.2.8 The application site is designated as a Locally Significant Industrial Site (LSIS) and on boundary with London Borough of Enfield. To the immediate west of the site is the Selby Centre, which falls within site location SA62 which is allocated for "*community use-led mixed use development including consolidation of community uses with potential housing development*". An application for the mixed-use redevelopment of the Selby Centre has now been submitted, ref: HGY/2024/2851. To the west of the Selby Centre is designated Open Space adjacent to Wier Hall Road.

- 6.2.9 The proposed internal floorspace would be approx. 7,258 sqm, an increase of 2,122 sqm. The site is an existing employment area and therefore the proposal for modern employment floorspace falling within Use Classes E(g)(ii), E(g)(iii), B2 and B8, is considered suitable and would provide flexible, high-quality workspaces of a scale that meets the current market requirements. Therefore, the site would provide enhanced employment use and economic benefits particularly in terms of securing a modern, viable use of the site and contributing towards policy objectives for accommodating industrial land and supporting economic growth. The proposal is therefore strongly supported by National, Regional and Local Policy.

### **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 applicant submitted a Pre-Application and received a positive feedback, although the scheme was not reviewed by the Quality Review Panel (QRP) the applicant has addressed the feedback received from the Council's Design Officer. Therefore, it is considered that the applicant has adequately addressed the points raised, concerning the design of the proposal.

#### *Height, Scale & Massing*

- 6.3.3 The proposal is for a short row of three "big box" industrial buildings and the proposed buildings would be single-storey buildings split into three units totalling approximately 7,258 sqm of modern employment floor space. The proposal would include office space at a mezzanine level in all three proposed buildings. The wider area has a mix of uses and character, there are residential properties immediately to south of the site that are two-storeys, generally in the wider area residential properties range between three and four storeys. The existing buildings vary in terms of scale and heights, from 4 metres to 10.5 metres. There are also numerous buildings to the northeast of the site that range up to approximately 17 metres in height with similar size footprint to that of the existing and proposed buildings. The proposed building heights would range in height from 11.6 metres to 13.5 metres and the clear internal heights for Units 1 and 2 is 8 metres and 10 metres for Unit 3. The Council's Design Officer notes that in general, the height of the proposals is higher than existing and comparable to some of the existing surrounding buildings. Notwithstanding this, it is acknowledged that this will allow more efficient automated storage for rapid distribution, as required by the rapidly evolving logistics sector, resulting in greater intensity of use than the existing. It is considered that proposed buildings, would be broadly comparable in height with buildings in the surrounding area and would sit comfortably within the established scale of the local area.

### Layout

- 6.3.4 The layout of the proposed development seeks to make a more efficient use of the site by intensifying the employment uses. The layout of the building has been split into three units to allow more flexibility and each unit has been stepped in on the boundary with residential properties on Allington Avenue to create greater separation distances than what currently exists. This would provide the opportunity to introduce a soft landscaping zone to act as screening and amenity space for the future employees. The ancillary office areas are proposed to be located on the northern and western elevations of the proposed units and will be orientated so that any windows will overlook car parking and service yards areas. This would provide natural surveillance to the service yards, car parking and cycle parking areas. The car parking and services yards are primarily located on the northern part of the site with direct access from the existing access road.
- 6.3.5 The proposal includes improved entrances, which would incorporate addition of a new continuous sidewalk along the northern side, with zebra crossing opposite each unit's pedestrian entrance. A new black weld-mesh fence along the whole of the northern boundary, onto the park with new smart gates of matching design and a new pedestrian & cycle gate to connect with paths in the planned improved park. This would result in a more integrated development that connects with a planned improved park, the new planned community facilities and café in the relocated Selby Centre (subject to a decision on that planning application).

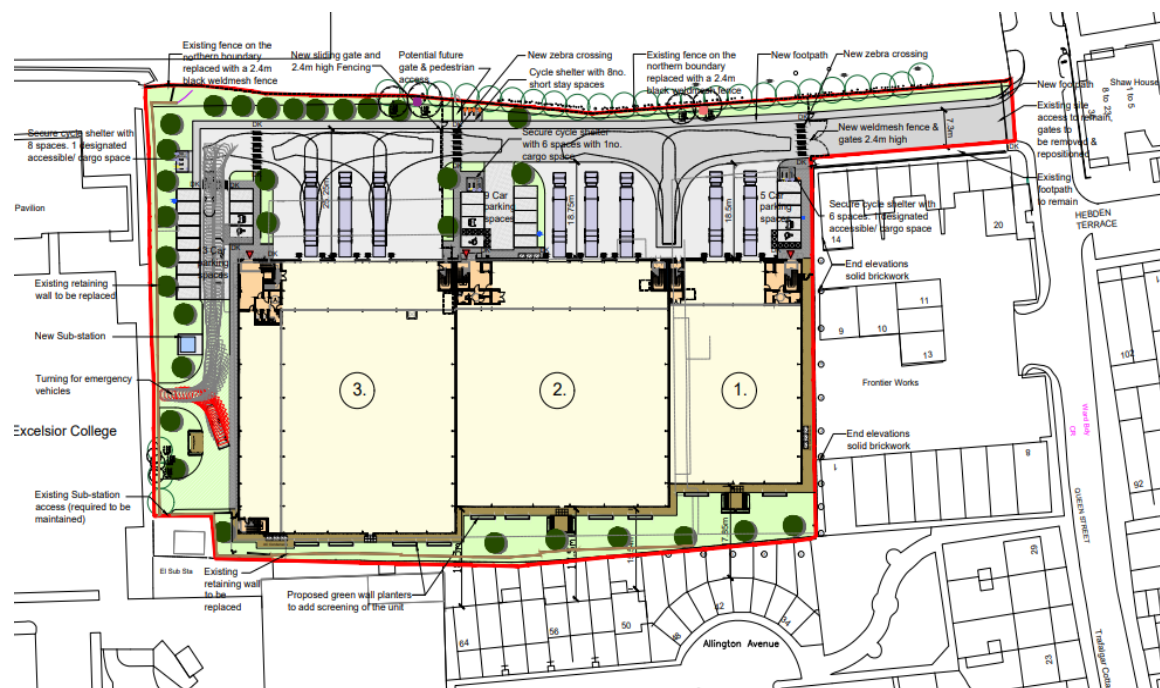


Image 4: Proposed layout

- 6.3.6 This layout is considered, acceptable, practical and flexible, resulting in an efficient use of existing employment land. There is no clear uniform pattern of development evident within the surrounding area. As such, it is considered that the proposal would not be at odds with any distinct urban grain of the area. The density of the scheme would be broadly

comparable to that of other industrial sites in the wider area, reflecting the scale the council accepted in other industrial intensification developments and therefore it is considered that the proposed intensification of the site would be appropriate to this setting.

#### Appearance, Form & Materiality

- 6.3.7 The proposed development would be of an industrial typology in line with the existing building stock in the LSIS; whilst in appearance would be modern and contemporary. All three units would have a prominent double height glazed entrance for office staff, customers and other visitors, and as a result improving the proposal's contribution to animating the "street" frontage, which is welcomed by the Council's Design Officer.
- 6.3.8 The Council's Design Officer has noted that the new "big box" portal framed industrial sheds would be considerably more attractive than the existing and those typically found in such industrial estates. Furthermore, it is considered that the proposed durable modern metal cladding in a range of tones of grey would retain the building's visual appearance. The subtle variations, rhythm of panels in contrasting greys, would break the down the visual mass and respond to the finer grained urban context, which is supported in, design terms.
- 6.3.9 To integrate the development with the proposed adjacent Selby Urban Village development (subject to a decision on that planning application), each unit would incorporate a double height of brickwork panels, with bricks to be chosen to match existing residential neighbours, with consideration to the proposals at the Selby Centre redevelopment. As a result, the whole development's appearance would reference the residential neighbourhood to the south, especially when viewed from the park. As such, the proposed elevations would add legibility and interest to building entrances, which is fully supported by the Council's Design Officer.
- 6.3.10 The roof of the industrial building would be low-pitched metal clad with hipped features to reduce the mass and visual appearance on the building. A green roof would be incorporated to the office of unit 3 to enhance biodiversity, also adding further visual interest to the development. All external materials would be secured via a condition. As such, it is considered that the appearance of the development would relate comfortably to its context, with high quality elevations and natural surveillance that enhances the street whilst assimilating the proposed building into the surroundings.

#### Landscaping

- 6.3.11 In terms of landscaping, the existing site primarily consists of hardstanding, which the new proposal seeks to address with a landscaped frontage that would combine large species of trees, which are compatible with the street character and the native hedge/ lawn turf on the roadside. The landscape proposals seek to highlight the entrance to the site and contribute to the green infrastructure network and overall biodiversity value of the site being increased over the existing by at least 48.36%. Parking areas will feature low-level ornamental shrub planting, as well as native hedgerows to assist in screening the development at the western boundary. To the southern boundary, the landscape treatment proposed would retain and enhance the existing grass verge behind the retaining wall through the introduction of a species-diverse woodland shrub mixture, species rich lawn turf, and scattered trees. This would create a landscape buffer between the new development and the neighbouring residential properties. The proposed amenity spaces

would create interest by contrasting the use of hard materials with the soft materials and a space for future employees to interact during their breaks. The development would also include green walls which are intended to soften the built form in combination with the soft landscape screening (tree and whip planting on the southern boundary), to provide layering and screening which can be naturally sustained. The details of landscaping would be secured by a condition, with consideration to be given to the proposed Selby Centre redevelopment (subject to a decision on that planning application).

- 6.3.12 Overall, officers consider that the proposed development as amended would be acceptable in design terms, as the development would be modern and contemporary. The new building would be of high quality and would relate well to the industrial nature of the area and the aspirations of the proposed Selby Urban Village. The height, bulk, scale, massing and layout of the redevelopment would respect the character of the surrounding area, whilst also intensifying the existing employment floor space. The materials and detailing would be reflective of the setting but would also result in an appropriately distinctive appearance for this new industrial hub. The development would make a positive contribution to the area and would improve upon the character and appearance of the site, the street scene and the wider locality. The proposal is considered acceptable in design terms and complies with the relevant policies.



Image 5: Appearance of buildings & materials

#### 6.4 Impact on amenity of neighbouring properties

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



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

Daylight Impacts assessment on surroundings properties

- 6.4.3 There are a range of residential homes in the surrounding area, most notably at Allington Avenue where the site backs on to the rear gardens of numbers 34 - 62 (even only) Allington Avenue. The applicant has submitted a Daylight and Sunlight by Equinox in support of this application. A Vertical Sky Component ('VSC') assessment has been undertaken as part of this to the existing residential windows to the south. All neighbouring windows tested for VSC adequacy meet Building Environment Establishment (BRE) criteria. No. 40 and 42 Allington Avenue experience losses marginally in excess of the 20% recommended in BRE guidance; however, all other windows assessed are compliant.
- 6.4.4 A Daylight Distribution ('DD') Assessment has also been undertaken, which has indicated that six out of 35 rooms tested will potentially experience minor adverse losses of light as a result of the proposed development, which results in an overall DD pass rate for the scheme of 83%. Whilst these rooms experience reductions beyond the 20% recommended in BRE guidance, the retained values are considered to be positive for an urban location such as this, with results in the proposed condition ranging from 69% to 75%.

Overshadowing assessment - Sunlight to existing open spaces

- 6.4.5 In terms of overshadowing, the report goes on to state it was not necessary to assess impacts on sunlight to windows, Annual Probable Sunlight Hour (ASPH) or external amenity areas (overshadowing) as part of this study. Windows facing generally northwards will only have very limited access to direct sunlight, if any, and sunlit hours within external spaces will not be affected by obstructions to the north.

Privacy/Overlooking and outlook

- 6.4.6 The submitted plans demonstrate that there will be no windows at the rear of the new buildings therefore, the proposal will not result in any overlooking impacts nor loss of privacy to the properties along Allington Road. Furthermore, the footprint of the proposed building has been set back from the boundary further than that of the existing building to enhance separation and mitigate impact on the residential properties.
- 6.4.7 Following, the advice from the Council's Design Officer, the applicant has incorporated green walls to the rear and trees to screen the buildings. This reduces the visual impact of the buildings, which combined with the high-quality façade, will provide a significantly more aesthetically pleasing outlook than the existing materials. It is considered that the inclusion of trees and green walls would increase visual interest and improve the overall outlook of these residential properties. As such, it is considered that the outlook for these properties would not be significantly impacted, rather would be visually pleasing.

- 6.4.8 In addition, the site would be bounded by a 2.4 metre high black weldmesh fencing, which would provide some screening, and the materials of the fence would be conditioned. The site is in an urban location and designated as LSIS and it is considered that the proposed development will not have an undue impact on the relationship with the adjoining residential properties whilst enabling an intensification of the site.

Impact on the proposed Selby Urban Village

- 6.4.9 In regard to the Selby Urban Village, the report states that the assessment has not considered the proposed new development at the Selby Urban Village, as the status of application is not known and was only submitted very recently. However, the proposal has evolved with the awareness of the pending redevelopment of the nearby site.

Other Impacts

- 6.4.10 Policy DM23 of the DM DPD states that new developments should not have a detrimental impact on air quality, noise or light pollution.
- 6.4.11 A Noise Impact Assessment prepared by Clarke Saunders Acoustic has been provided in support of this application. The closest noise sensitive receptors ('NSR') to the site are the residential properties that are located at 34 to 64 Allington Avenue, directly to the south and adjacent to the site. The proposed units will operate on a 24-hour basis and will therefore generate Large Goods Vehicle (LGV) and Heavy Goods Vehicle (HGV) movements in the yard spaces. As the yard spaces will be located to the north of the units, the units will assist in screening noise emitted that could impact the residential properties to the south. The Noise Impact Assessment (NIA) has determined that the noise generated by the proposed development would have a 'low impact' (as set out in BS4142 Technical Note) on the closest Noise Sensitive receptor (NSR). The noise officer has advised that this is acceptable subject to a "Noise Management Plan" condition being attached to manage the noise on site.
- 6.4.12 Any, dust and noise relating to demolition and construction works would be a temporary impact, which would typically be 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.
- 6.4.13 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.



Image 6: Green wall planters to the rear elevation

## 6.5 Parking and highway safety

- 6.5.1 London Plan Policy T4 explains that proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. In terms of cycling, London Plan Policy T5 requires developments to provide appropriate levels of cycle parking, which should be fit for purpose, secure and well located. Cycle parking should be provided in accordance with the minimum standards in Table 10.2 of the London Plan. London Plan Policy T6 sets out that car parking should be restricted in line with the levels of existing and future public transport accessibility and connectivity. Developments should be designed to provide the minimum necessary car parking. The maximum parking standards, outlined in Table T6.2 of the London Plan, should be applied to this proposal. The standards for non-residential disabled persons parking are identified in Table 10.6 of the London Plan.
- 6.5.2 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'.
- 6.5.3 The site has a PTAL rating of 2-3 indicating that its access to public transport is reasonably good when compared to London. The site is located within the Northumberland Park West CPZ that restricts parking to permit holders Monday to Saturday 08:00 - 20:00, with further restrictions when events are taking place at the local Tottenham Hotspur Stadium. However, it should be noted that the Tottenham Event Day CPZ operates in nearby streets, with restrictions not operating when events are not on.

### Trip Generation

- 6.5.4 As stated above the site has PTAL of 2-3, which indicates that access to public transport is reasonably 'good'. A Transport Assessment (TA) has been submitted in support of the

application and has been reviewed by the Council's Transportation Officers. The TA suggests the highest mode share forecasted will be by public transport, with this representing 49% of all trips, the second highest would be car with 36% of the share, and thirdly walking to the site. The TA states that, the existing Bookers currently generates at least a total of 44 arrivals and 16 departures between 07:00-10:00 and generates a total of 24 arrival and 46 departures between 16:00-19:00. In regard to the proposed development, it would generate 61 arrivals and 22 departures between 07:00-10:00. Then, 33 arrivals and 64 departures between 16:00-19:00. Overall, the site would produce an increase in vehicle trips given the intensification of site, compared to the existing (cash & carry) onto the local road network.

- 6.5.5 A draft Travel Plan has been submitted with the application, which details the modes of travel by employees from the site and how it would be managed. However, no measures have been suggested on how to lower car use, increasing cycle parking or reducing car use. To ensure sustainable travel to the site is confirmed, a site wide Travel Plan would be secured via a S106 Legal Agreement (one for each unit). Subject to this, it is considered that the development would suitably support sustainable transport.

#### Car Parking

- 6.5.6 The transportation statement states that 130 parking spaces would be removed and 27 new car parking spaces would be provided for employees, with 3 being allocated as disabled bays. The number of parking spaces will be allocated as follows:

- Unit 1: 4 general spaces and 1 disabled bay.
- Unit 2: 8 spaces and 1 disabled bay.
- Unit 3: 12 spaces and 1 disabled bay.

#### Future parking demand

- 6.5.7 A parking stress survey was conducted and has been submitted to support the application. It utilises the Lambeth Methodology covering an area of 200m from the site and was carried out over one day at the following times 06:00-10:00 and 15:00-19:00. The survey demonstrated that the morning parking stress levels were highest at 06:00 with 86% stress and the lowest at 09:00 with 61%. The afternoon survey showed was its highest at 19:00 with 75% and lowest at 15:00 with 50%. Therefore, the parking stress survey concluded that although, 130 parking spaces have been removed there is still some availability within the vicinity of the site, and this also indicates that the parking provided would be sufficient for the proposed development.

- 6.5.8 The Council's Transportation Officer considers that the proposed allocation is in accordance with London Plan Policy T6. The proposed car parking provision is considered appropriate for the development. A car parking management planning condition would be attached for the site's wider car parking provision.

#### Electrical vehicle charging

- 6.5.9 The applicant's Transport Statement states that the proposed development would include 3 electric charging points which would be positioned to serve 6 parking spaces. The Transportation Officer consider that this number of charging points is sufficient to meet the

### Cycle Parking

### Access Arrangements

**NEW PEDESTRIAN CROSSING**

**FUTURE POTENTIAL PEDESTRIAN LINK AND GATE**

**NEW SHORT STAY CYCLE PARKING**

**NEW 2.4M HIGH BLACK WELDMESH FENCE TO BOUNDARY**

**NEW PEDESTRIAN & VEHICULAR GATES (EXISTING REMOVED)**

Existing fence on the northern boundary replaced with a 2.4m black weldmesh fence

New sliding gate and 2.4m high Fencing

Potential future gate to pedestrian access

New zebra crossing

Cycle shelter with 8no. short stay spaces

Secure cycle shelter with 6 spaces with 1no. cargo space

Existing northern boundary replaced with a 2.4m black weldmesh fence

New footpath

New zebra crossing

New weldmesh fence & gates 2.4m high

Secure cycle shelter with 6 spaces 1 designated accessible/ cargo space

End elevations solid brickwork

End elevations solid brickwork

Existing retaining wall to be replaced

New Sub-station

Turning for emergency vehicles

Excelsior College

Existing Sub-station access (required to be maintained)

Existing retaining wall to be replaced

Proposed green wall planters to add screening of the unit

Shire House

Existing rear access to rear gates to be removed & repositioned

Existing footpath to remain

HIDDEN TERRACE

Frontier Works

81 Sub Sta

Existing retaining wall to be replaced

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## Planning Sub-Committee Report

6.5.13 An Active Travel Zone (ATZ) Assessment has been produced and submitted as part of the Transport Statement. Five walking routes to key destinations were analysed and assessed against the Healthy Streets indicators. These routes were:

- Route 1: Site to/from North Middlesex Hospital Bus Stops.
- Route 2: Site to/from Silver Street Overground Station.
- Route 3: Site to/from the High Road.
- Route 4: Site to/from White Hart Lane Overground Station.
- Route 5: Site to/from Great Cambridge Road Post Office.

6.5.14 The Transportation Officer observed that improvements to these routes would be required. The improvements would include new zebra crossings on Queen Street and Bull Lane. In addition, seating for the bus stop at Somerset Road, covered bike stands outside Silver Street Station, inclusion of tactile on dropped kerbs on Queen Street, tree planting and installation of dedicated cycle lane on White Hart Lane. Due to an increase in the number of larger vehicle movements that could cause further damage to the footways and the identified routes within the ATZ, a contribution would be required towards the improvements, enhancement and reconstruction of footways, which will be secured via a S.106 obligation.

#### Service and delivery

6.5.15 A draft Service and Delivery Plan has been submitted with the application. All delivery and servicing is proposed to take place within the yard area. Vehicles will access the site via Queen Street and leave via the same access. The site would have 8 HGVs loading bays that will be serviced by 16.5m HGVs and the floor space would increase by 27% compared to the existing site. In terms of the numbers of HGVs, the trip generation given indicates that the majority of these movements would be via 16.5m long HGVs. Detailed swept paths have been included in the Service & Delivery Plan, which demonstrates how 16.5m HGVs would be able to reverse into a loading bay and leave in a forward gear. Such movements are considered appropriate and would allow the free flow of delivery and service vehicles through the site. The swept path analysis provided by the applicant is considered to be acceptable.

6.5.16 The Transportation Officers, have queried that no exact routing was provided or proposed as part of the application for HGVs, however the applicant has confirmed that currently the existing HGVs deliveries do not have a set route that they travel by. Furthermore, work conducted by The Council's Highways Officers indicates that 16.5m HGVs can be routed via either from the High Road or from the A10.

6.5.17 As stated previously, the majority of the movements would be by 16.5m HGVs and as such, details on how deliveries will be managed or timed when entering and existing site has not been provided in the draft Service & Delivery Plan. Furthermore, the applicant has not examined other alternative methods outside of 16.5m HGVs that will increase according to the trip generation. The Council's Transportation Officer considers that the above issues can be addressed via the submission of a Service & Delivery Plan to manage deliveries access to the site and to limit the number of trips to the site in order to manage the impact on the highway network. A condition would be attached requiring the submission of a Service & Delivery Plan.

- 6.5.18 The proposed development would result in an increase in the number of deliveries made to the site. Furthermore, tracking undertaken by Highway Officers revealed that both roundabouts to be unsuitable for HGVs to traverse the roundabouts at the junction of White Hart Lane with Selby Road and the junction of White Hart Lane with Creighton Road. Given the issues highlighted above, Transportation Officers consider that improvement works are required and these works should be secured via s.278 obligation.

#### Construction and logistics

- 6.5.19 The applicant has submitted a draft Construction Logistic Plan (CLP) which has been reviewed by Transportation Officers. The Transportation Officer considers that a Road Safety Audit (RSA) will need to be completed before any CLP related construction could begin, as it will inform decision making on the movement of larger 16.5m HGVs for the final CLP document. Furthermore, before construction begins a general highway survey will need to be carried out to ascertain the condition of the footway and highway and to determine if vehicle accesses will need to be reinforced. The final CLP would be secured via a S.106 obligation.
- 6.5.20 Subject to the conditions and obligations as 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.

### **6.6 Energy and Climate Change**

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

#### Carbon Reduction

- 6.6.3 The applicant has 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 roof 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.

#### BREEAM

- 6.6.4 The applicant has prepared a BREEAM Pre-Assessment. Based on this report, a score of 76.60% is expected to be achieved, equivalent to 'Excellent' rating. A potential score of 87.93 % could be achieved which delivers an 'outstanding' this supported subject to a condition.

### Overheating

- 6.6.5 In terms of overheating, the applicant has submitted a revised report, which has been reviewed by the Council's Climate Change Officer. Officers note that, the revised report has included all three criteria for assessment and indicates that proposed development has passed all the criteria. A condition would be attached to secure overheating mitigation measures.

### Decentralised Energy Network (DEN)

- 6.6.6 The applicant has submitted evidence confirming there is no existing Decentralised Energy Network (DEN) connection available. However, the applicant should consult with Haringey Council and Enfield's Energetik about a possible future DEN connection and if viable, the applicant to submit details. The details would be secured via a condition.
- 6.6.7 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.

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

- 6.7.1 Policy G5 of The London Plan 2021 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design. The policy states that non-residential development should meet an urban greening factor target of 0.3 but states that whilst B2 and B8 uses are excluded from the 0.3 target, such development is still expected to set out what measures they have taken to achieve urban greening on-site.
- 6.7.2 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.
- 6.7.3 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.
- 6.7.4 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.
- 6.7.5 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 0.23, which while low, is an improvement compared to the current situation of almost no greening. The site is designated as a Locally Significant Industrial Site (LSIS) and the aim of the proposal is to secure the intensification of employment capacity at the site, as required by Local Plan and London Plan 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.

- 6.7.6 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 includes good urban greening improvements, which provides an acceptable balance between greening and intensification of B2 and B8 uses, as such, this is considered acceptable in urban greening terms.

#### Trees

- 6.7.7 There are some trees within the site boundary at the west and northern boundaries. The trees at the western boundary are growing in a raised concrete ledge and include elder (*Sambucus nigra*) and *Prunus* spp. The northern boundary has a treeline running adjacent to the site boundary consisting of largely conifers and evergreen species (*Cupressus* spp.), and Willow (*Salix* spp.) with several trees on the northern boundary within the site boundary.
- 6.7.8 The Council's Tree Officer has been consulted on the proposal, and notes that no trees would be felled, and 31 new trees would be planted, which is supported by officers. It is therefore considered that the proposal is compliant with planning policy and a condition would be attached, requiring specification for the new tree pits, a five-year aftercare plan to establish independence in the landscape for the new trees and proposed planting.

#### Ecology/Biodiversity

- 6.7.9 Policy G6 of the London Plan requires development proposals to manage impacts on biodiversity and aim to secure net biodiversity gain.
- 6.7.10 Strategic Policies DPD Policy SP13 requires development to protect and improve biodiversity, including contributing to wildlife and ecological habitats and, where possible, including tree planting, green and brown roofs, rainwater harvesting, green walls, bird and bat boxes.
- 6.7.11 The applicant has submitted a Biodiversity Net Gain Assessment, in support of this application. The site comprises of hardstanding, modified grassland, ruderal vegetation and trees. The report confirms that the existing habitat value of the site is approximately 3.72 units. Notwithstanding this, the proposed landscape enhancements will result in an overall net gain of approximately 48.36%, which is considered acceptable.
- 6.7.12 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/tree planting. 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.

- 6.7.13 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.

## **6.8 Flood Risk and drainage**

- 6.8.1 London Plan Policy SI12 states that flood risk should be minimised and Policy SI13 states that development proposals should aim to achieve greenfield run-off rates with water managed as close to source as possible. Local Plan Policy SP5 and Policy DM24 of the DM DPD seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage.
- 6.8.2 The site is located with Flood Risk Zone 1 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.
- 6.8.3 The DPD Policy DM24 seeks that "All proposals for new development within Flood Zone 2 and 3a will be required to provide sufficient evidence for the Council to assess whether the requirements of the Sequential Test and Exception Test, where required, have been satisfied." The site is Flood Risk Zone 1.
- 6.8.4 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.
- 6.8.5 As the proposal is 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.
- 6.8.6 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.
- 6.8.7 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.
- 6.8.8 Accordingly, the proposed development is considered to comply with local drainage policies.

## **6.9 Air Quality and Contamination**

### Air Quality

- 6.9.1 Policy SI1 of the London Plan states that development proposals should be air quality neutral. Policy DM23 states that developments should not have a detrimental impact on air quality, noise or light pollution.
- 6.9.2 The applicant has submitted an Air Quality Assessment. The report sets out, that site is considered to have a high to low risk of dust soiling impacts, medium to low risk of ecological impacts and low to negligible risk of increase in (particulate matter) PM concentrations impacts. 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.
- 6.9.3 Officers consider that the mitigation measures proposed during demolition and construction are sufficient to make the scheme acceptable from an air quality perspective.

#### Land Contamination

- 6.9.4 Local Plan Policy DM23 requires development proposals on potentially contaminated land to follow a risk management-based protocol to ensure contamination is properly addressed and to carry out investigations to remove or mitigate any risks to local receptors.
- 6.9.5 The Council's Pollution Officer has been consulted as part of the application and has raised no objections, subject to further investigations being made at the construction stage and this is to be secured by way of the imposition of conditions on any grant of planning consent.

### **6.10 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). Furthermore, the developer would be required to provide a support towards recruitment costs for apprenticeships and one full time apprenticeship per development. All these requirements would be secured by agreement.
- 6.11.2 The applicant has indicated that the development would provide 7,258 sqm of employment floor space for flexible E, B2 and B8 use. The proposed redevelopment of site would

potentially increase the number of jobs from 57 to 242 full time equivalent (FTE) jobs, which is a significant net gain.

- 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. The applicant would be required. As such, the development is acceptable in terms of employment provision.

## **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.

## **7.0 CONCLUSION**

- There is strong policy support for intensifying employment floor space within a Strategic Industrial Location.
- The proposed development would increase the existing floor space by approximately 2,122 sqm, creating a total 7,258 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 £146,990.94 (2,122 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.

## **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 Informatives**

1. The development hereby authorised must be begun not later than the expiration of 3 years from the date of this permission, failing which the permission shall be of no effect.
2. The development hereby authorised shall be carried out in accordance with the following approved plans and specifications:

Site Location Plan	11472-PL-001
Proposed Site Plan	11472-PL-002 REV C
Ground Floor Plans	11472-PL-003
First Floor Plans	11472-PL-004
Proposed Roof Plans	11472-PL-005
Proposed Elevations	11472-PL-006 REV A
Site Sections	11472-PL-007
Frontage Signage	11472-PL-008
Street Scenes	11472-PL-009
Landscape GA Plan Sheet 1 of 6	11472-PL-020
Landscape GA Plan Sheet 2 of 6	11472-PL-021 REV B
Landscape Detail	11472-PL-022
Urban Greening Factor Diagram	11472-PL-023
Landscape Maintenance Management Plan	
Existing Site Layout	11472-PL-030
Existing Elevations	11472-PL-031
Existing Roof Plan	11472-PL-032
Design and Access Statement	REV C
Substation Floor Plan and Elevation	11472-PL-110
Community Infrastructure Levy Form	Montagu Evans
Covering letter	Montagu Evans
Planning Statement	Montagu Evans
Design and Access Statement	PRC
Transport Assessment	TTP Consulting
Framework Travel Plan	TTP Consulting
Delivery and Servicing Plan	TTP Consulting
Outline Construction and Logistics Plan	TTP Consulting
Air Quality Assessment	TRC
BREEAM Pre-Assessment Report	Cudd Bentley Consulting
Daylight and Sunlight Report	Equinox
Energy and Sustainability Statement	Cudd Bentley Consulting
Flood Risk and SuDS Strategy Report	Heyne, Tillett, Steel
Geotechnical Report	Geotechnical Consultancy
External Lighting Impact Assessment	Cudd Bentley Consulting
Noise Impact Assessment	Clarke Saunders Acoustics

Preliminary Ecological Appraisal  
Biodiversity Net Gain Assessment  
Fire Strategy  
Urban Greening Factor Calculator

Phlorum  
Phlorum  
BB7  
PRC

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 London Plan 2021, 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 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.

c) 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.”

## **Delivery and Servicing Plan**

7. 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.

## **Cycle Parking**

8. 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.

## **Electric Vehicle Charging**

9. Prior to occupation of the development hereby approved, 6 car parking shall be provided with electric vehicle charging infrastructure, with a further 24 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.

## **Disabled Parking Bays**

10. 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**

11. 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:

- i. Location and design of the car parking space(s).
- ii. Provision of Electric Vehicle Charging Point(s) (direct provision for the space(s)).
- iii. 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.

### **Energy Strategy**

12. (a) Prior to the commencement of development, a revised Energy Statement shall be submitted and approved by the Local Planning Authority. This shall be based on the submitted Energy and Sustainability Statement by Cudd Bentley (rev 04, dated 11th September 2024), delivering a minimum site-wide carbon emission reduction of 109% from a Building Regulations 2021 Part L compliant building, with high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 380 kWp solar photovoltaic (PV) array and inverter capacity. The revised strategy shall include the following:

- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;
- Confirmation of the fabric efficiencies will meet the targets proposed in the Energy and Sustainability Statement by Cudd Bentley (rev 04, dated 11th September 2024):
  - 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: 1.6 W/m2K
  - Window U-value: 1.40W/m2K (glazing)
  - G-value: 0.34
  - Air permeability rate: 3 m3/hm2 @50Pa
- Detailed BRUKL calculations for the non-residential element of the development, demonstrating how it will exceed the 15% improvement on Building Regulations under Be Lean;
- 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**

13. 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 (rev 02, dated 27th Aug 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.

### **Living roofs**

14. (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, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

## **BREEAM**

15. 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.
- 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.

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.

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.

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.

### **Biodiversity measures**

16. (a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall be based on the submitted Biodiversity Net Gain Assessment by Phlorum (rev 01, dated 15th April 2024) achieving overall net gain of 48.36% in habitat units from the existing baseline. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.

(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.

Development shall accord with the details as approved and retained for the lifetime of the development.

Reason: To ensure that the development provides the maximum provision towards the 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.

### **Secured by Design Accreditation**

17. 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 guidelines 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**

18. 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.

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.

### **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. No 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, including the rebuilding of the boundary wall to the west, adjoining the Selby Centre site. 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

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

21. 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).

### **Hard and Soft Landscaping Works**

22. 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**

23. Pre-occupation a tree specification for new tree pits and five-year aftercare programme for all new planting shall be submitted in writing and approved by the Local Planning Authority Reasons:

To ensure establishment and independence for the new plantings.

### **Noise Management Plan**

24. 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.

### **Plant Noise**

25. 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.

### **Waste and Recycling**

26. 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.

### **Restrictive uses classes**

27. 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.

## **Urban Green Factor**

28. 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.

## **DEN Connection**

29. Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:
- Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.
  - Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;
  - A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;
  - Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.

## **Drainage Management and Maintenance**

30. 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.



## **INFOMATIVES**

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

Based on the information given on the plans, the Mayoral CIL charge will be £146,990.94 (2,122 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 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.

#### **INFORMATIVE: Asbestos**

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

#### **INFORMATIVE: 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: Street Numbering**

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

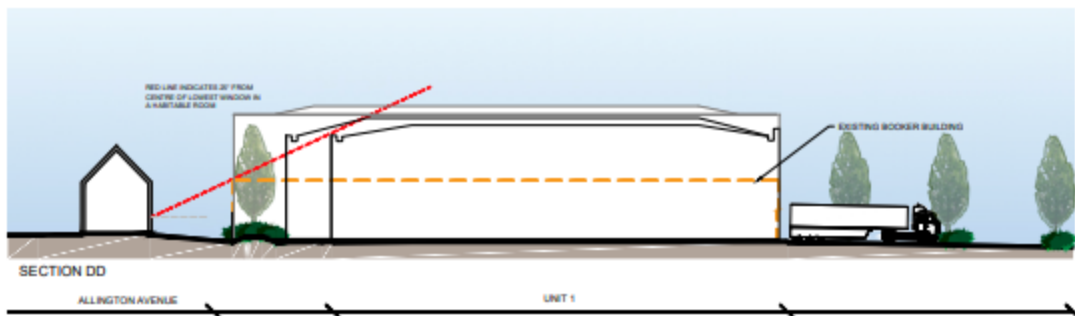
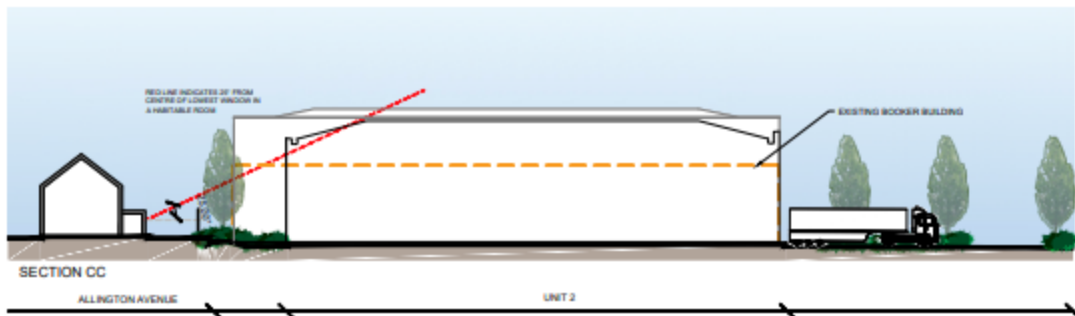
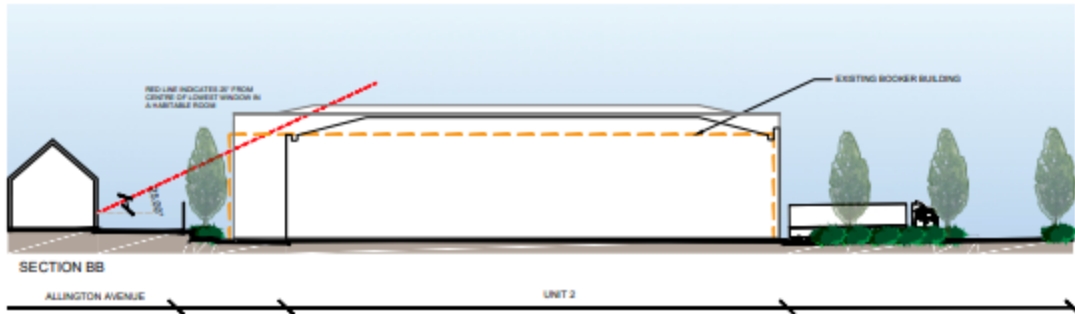
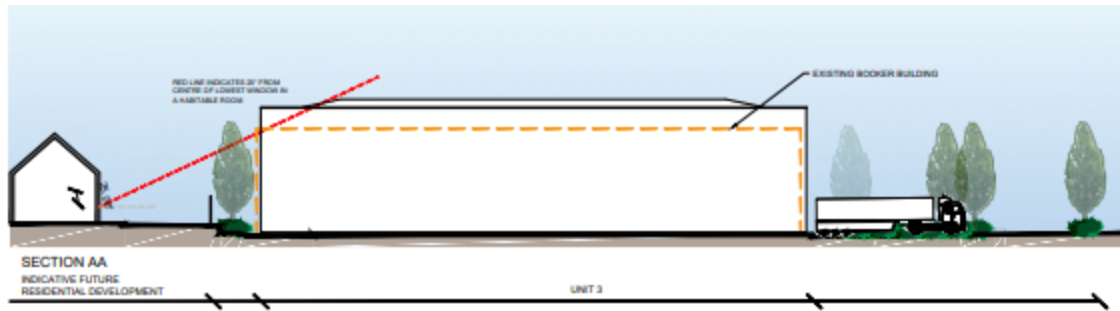
## **Appendix 2 - Plans and images**



Site location plan

## Elevations & Sections

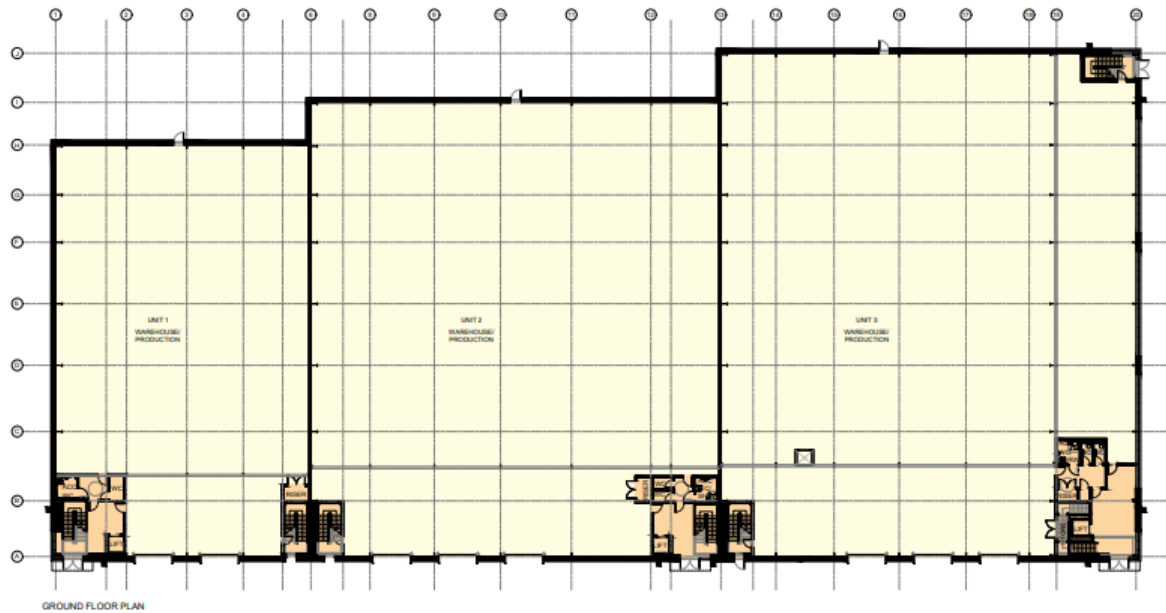




## SECTIONS



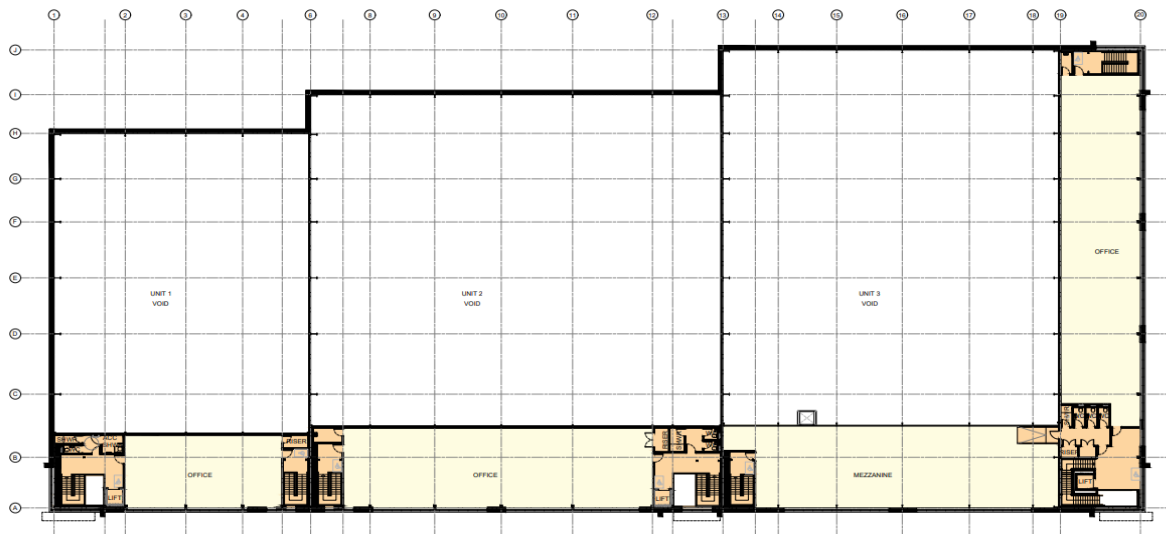
**Proposed floor layout**



UNIT 1	UNIT 2	UNIT 3
GROSS EXTERNAL AREA	GROSS EXTERNAL AREA	GROSS EXTERNAL AREA
GP 1271sq'	GP 2124sq'	GP 2412sq'
FF 352sq'	FF 623sq'	FF 639sq'
TOTAL 1462sq' / 15.715sf	TOTAL 2547sq' / 27.415sf	TOTAL 3251sq' / 34.953sf

UNIT 1	UNIT 2	UNIT 3
GROSS INTERNAL AREA	GROSS INTERNAL AREA	GROSS INTERNAL AREA
GP 176sq'	GP 217sq'	GP 234sq'
FF 82sq'	FF 82sq'	FF 77sq'
TOTAL 136sq' / 14.86sf	TOTAL 246sq' / 26.60sf	TOTAL 311sq' / 33.48sf

Ground Floor Plan



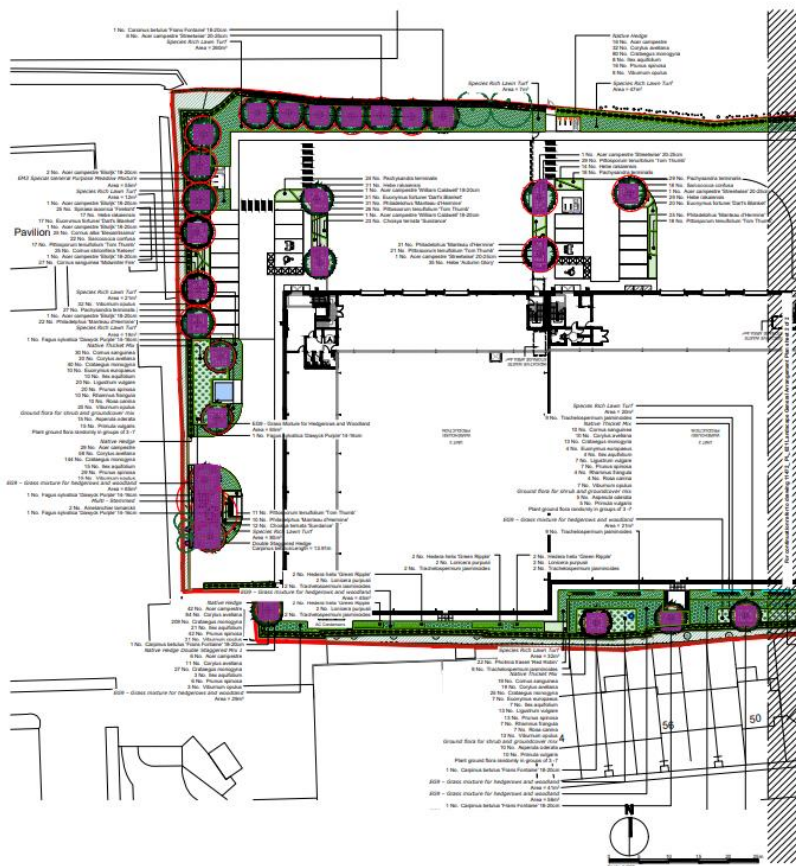
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First Floor Plan

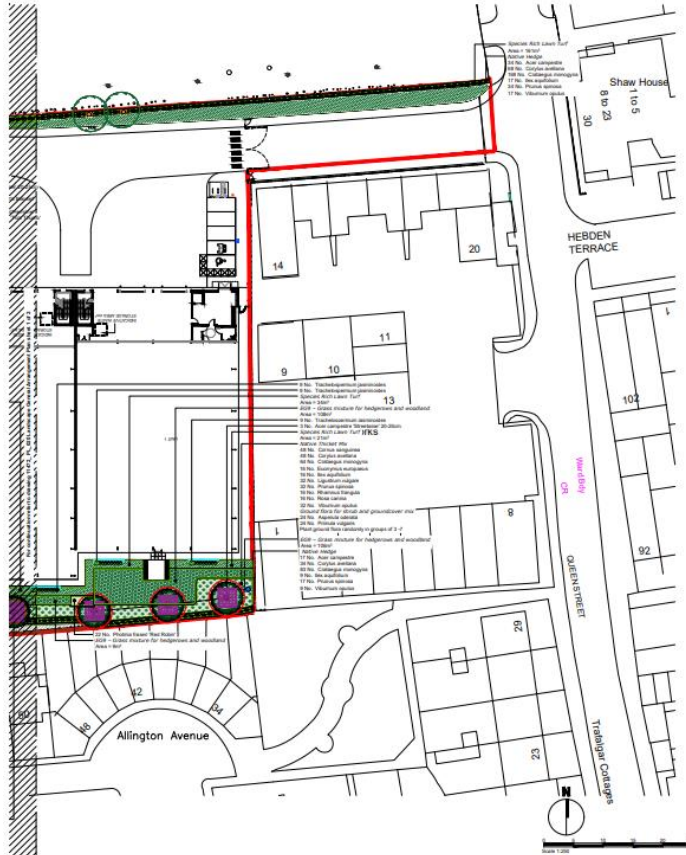


- [illegible]



	Design/Design	Design/Design
A. Planning constraints (unresolved)	NR	18.57.24
B. The selected design office constraints	NR	63.55.24

[illegible]



Planting Schedule

Tree	Species	Size	Quantity	Notes
1	Platanus	100cm	1	Platanus
2	Platanus	100cm	1	Platanus
3	Platanus	100cm	1	Platanus
4	Platanus	100cm	1	Platanus
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22	Platanus	100cm	1	Platanus
23	Platanus	100cm	1	Platanus

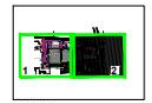
Platanus

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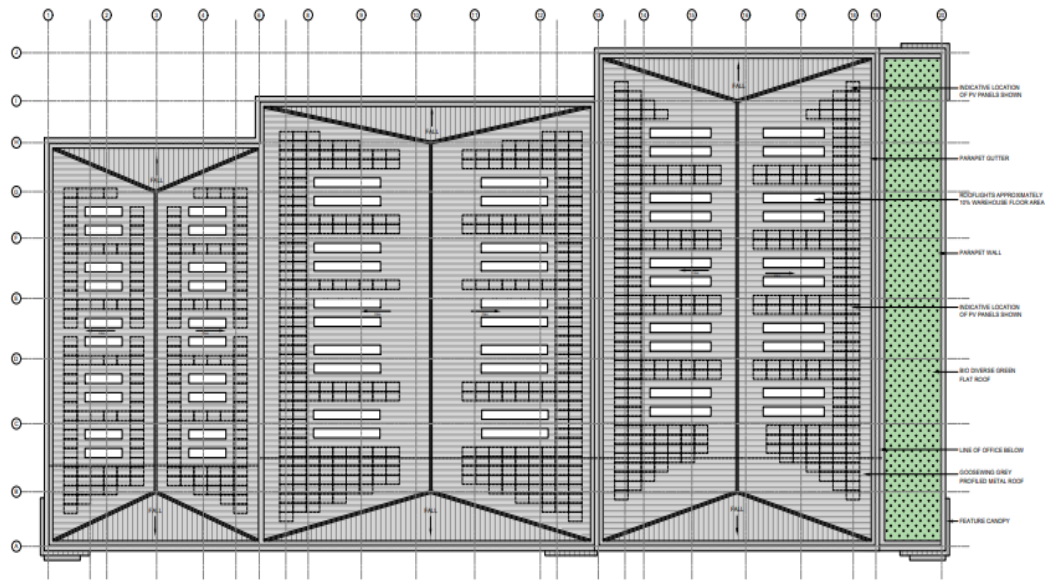
Platanus

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22	Platanus	100cm	1	Platanus
23	Platanus	100cm	1	Platanus

Platanus



Landscaping Plan



ROOF PLAN

## Roof Plan

## Photographs of site



VIEW 1 OF NORTHERN BOUNDARY, Google Maps 2024



VIEW 2 OF EASTERN BOUNDARY, Google Maps 2024



VIEW 3 OF SOUTHERN BOUNDARY, Google Maps 2024



VIEW LOCATION PLAN



VIEW 4 OF WESTERN BOUNDARY, Google Maps 2024



## Birds Eye View



NORTH FACING, Google Earth 2024



EAST FACING, Google Earth 2024



SOUTH FACING, Google Earth 2024



WEST FACING, Google Earth 2024

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

Stakeholder	Question/Comment	Response
<b>INTERNAL</b>		
<b>Design Officer</b>	<p>Redevelopment of Site for industrial and warehousing purposes (within Use Classes E(g)(ii), E(g)(iii), B2 and B8, with ancillary office accommodation together with access, service yard, car and cycle parking, landscaping, construction of a new substation, boundary treatments and other related works including demolition.</p> <p>Thank you for asking for my comments on this application. I have been closely involved in discussions from the earliest pre-application meeting two years ago, and have managed to secure significant improvements, particularly to landscaping and means of enclosure during the course of the application process to make it what I consider from a design point of view an acceptable proposal.</p> <p>The application site, currently a Bookers Wholesale in a large single storey metal clad industrial shed, set in larger areas of hard standing, is in the north-east of Haringey, with the northern boundary of the site also being the borough boundary with Enfield. It is about 500m to the north-west of White Hart Lane Overground Station and the local centre of North Tottenham, also home of the world-famous Tottenham Hotspur Football Club. Its immediate neighbours are predominantly low-rise, inter- or early post-war residential terraces to the south, "Frontier Works", an estate of small, single storey industrial units to the east, "Bull Lane Playing Fields", a run-down recreation area to the north and "The Selby Centre", a post-war former secondary school repurposed as a community centre to the west and south-west. There are further industrial buildings to the north-east, on the opposite side of Queen Street / Bull Lane, with further residential to the north and north-west beyond the playing fields, as well as to the west, south-west, south and south-east, mostly low rise 2 storey terraces or semi-detached, but with some higher rise flatted blocks, including The Waymarks, a high rise 1960s pair of slab blocks west of The Selby Centre and the adjacent primary school.</p> <p>The site is accessed via a private drive in its north-eastern corner, running between Frontier Works and Bull Lane Playing Fields, from Queen Street, which changes name to Bull Lane when it crosses the borough boundary and runs north-south, connecting White Hart Lane to the A406 North Circular, although a recently installed bus gate prevents private vehicles accessing Bull Lane from Queen Street, as part of recent changes to make it part of the</p>	Support noted. Condition 3,9 & 21

Stakeholder	Question/Comment	Response
	<p>designated Cycleway C1 (formerly Cycle Super Highway CS1). Terrain is very gently sloping, but the site sits close to the highest point of the slight hill.</p> <p>There is currently a separate proposal for a major redevelopment of The Selby Centre and Bull Lane Playing Fields, known as Selby Urban Village, currently at advanced stages of the pre-application process, for Haringey and Enfield Councils, which would see the playing fields restored and significantly upgraded, a replacement purpose build three to five-storey Selby Centre close to the north-western boundary of this site, and for new residential apartments of between four and six storeys on the former school site, although the sports hall on the immediate south-western boundary of this application site would be retained, at least in the short term.</p> <p>At the time this proposal came to the Council as a pre-application enquiry, the Selby Urban Village project was in abeyance. Officers could not therefore ask these applicants to coordinate with Selby. But in the last few months the Selby project has come back to life and is expected to submit its planning applications (to both councils) within the next few weeks. Officers have therefore recently advised both teams to coordinate their proposals. This applicant has therefore made some minor but useful changes to allow a pedestrian and cycle entrance to their development from within the improved park. This is welcomed.</p> <p>However, the fundamental proposal for this site is that of a short row of three “big box” industrial buildings set in a landscape that prioritises efficient access and servicing by large commercial vehicles and a high security perimeter. This urban typology is not generally conducive to a pedestrian and cycle friendly environment, a vibrant, fine-grain, urban realm or an inclusive, accessible landscape as understood as being best practice in urban design. Nevertheless, the need for buildings and space for this sort of building, especially for the rapidly growing logistics sector, is very strong, the existing form and use of the site is currently in such an urban typology, and the proposals make some gestures towards a more inclusive and urban friendly design, with improved pedestrian and cycle approach and access, a more attractive appearance and significantly more green landscaping.</p> <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,</p>	

Stakeholder	Question/Comment	Response
	<p>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 fairly well suited to significant industrial intensification. However, the applicants have convincingly demonstrated that their site is not large enough to accommodate multi-storey. 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.</p> <p>The applicants have also included a significant amount of office space at a mezzanine level in all three proposed buildings, especially the largest western one, as well as further ancillary storage that could easily be converted to more office accommodation. In general, the height of the proposals are higher than those they replace / or are surrounded with. 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 all three cases there will also be a prominent double height glazed entrance for office staff, customers and other visitors, improving the proposal's contribution to animating the "street" frontage onto the site access road, and to some extent, onto the park beyond.</p> <p>The existing entrance road which currently only has a sidewalk on one side, its south side (which also, obscurely, appears to be outside of their ownership) will be improved for pedestrians, with the addition of a new continuous sidewalk along the northern side, and with zebra crossings opposite each unit's pedestrian entrance, leading to a landscaped path straight to each unit's entrance door and entrance hall. Fences and gates will also be comprehensively renewed in these crucial areas, with a new black painted "weld-mesh" fence along the whole of the northern boundary, onto the park, smart new gates of matching design to the main vehicle and pedestrian entrances off Queen Street, and a new pedestrian (&amp; cycle) gate further west along the northern boundary, off the park, to connect with paths in the planned improved park and planned new community facilities and café in the relocated Selby Centre.</p> <p>The new "big box" portal framed industrial sheds will be of considerably more attractive appearance than those existing or are typically found in such industrial estates. Durable modern metal cladding in a range of tones of grey should retain their visual appearance, with subtle variations and a rhythm of panels in contrasting greys, breaking down their apparent</p>	



Stakeholder	Question/Comment	Response
	<p>visual mass and responding to the finer grained urban context. Significant areas of mezzanine offices and storage will enliven particularly the northern elevations onto the main entrance , parking and loading areas, and beyond that the park. The western elevation of the end unit will also be enlivened with additional doors and windows on two floors including the ground floor, where it looks onto the staff amenity area to its west and beyond that the new housing of Selby Urban Village. But most of all, each unit's main (pedestrian) entrance will be picked out and celebrated, as a corner feature with double height glazing adjacent to double height panels of brickwork, with bricks to be chosen to match existing residential neighbours to the south, providing a particularly attractive, warm, tactile, human scaled, durable panel of material against their main entrances, and giving the whole development's appearance an echo of the residential neighbourhood to the south, especially when viewed from the park.</p> <p>The proposals also include generous external green landscaped areas, providing setting for the development, buffers to neighbours (particularly residential neighbours), and outdoor amenity areas for staff. The largest, western unit will have a large landscape and amenity strip to its west, accessed off their main entrance and secondary entrance, overlooked from their offices, and containing outdoor seating as well as occasional servicing access to the site electricity sub-station, tucked away as unobtrusively as possible in the far south-western corner of the site. The other two units will have generous amenity space to their south, in secluded, peaceful, sunny landscaped sots, screened from each other and the housing to their south with dense hedging, and, very importantly, overlooked from within the units with glass doors off their warehouse space. The southern boundary, that the current industrial building and hard yard space go right up to, will be a lushly landscaped zone, further enhanced with panels of a framework of wires on the building facades, where climbing plants will be encouraged.</p> <p>The proposals will have a somewhat greater impact on the immediately adjacent houses to their south and on views from the streets beyond them, as they will be a small amount taller and quite a lot wider than existing. But by the eastern two units being set-in from the boundary, they will not have a greater impact on daylight to those dwellings, and the modern appearance of clean durable materials, significantly enhanced by the climbing plants and site landscaping will be a much more pleasing appearance from the immediate neighbours and in longer views from the streets beyond.</p>	

Stakeholder	Question/Comment	Response
	<p>Overall, whilst the proposals are not of an urban form and character that would be welcomed from an urban design point of view in most of Haringey, this is one of the lower density, more suburban areas of the borough, and is an area with established industrial uses, including of existing, uglier “big box” industrial buildings, including specifically on this site. The proposals will probably be a more intensive use of the site than existing, designed for the much-needed logistics sector, and contain better accessibility and enlivenment for pedestrians and cycles than is typical for industrial buildings. Appearance and animation have been thought about, particularly of the views from the park to the north, and to be harmless when viewed or glimpsed withing the neighbouring housing and residential streets to the south and planned residential neighbourhood to the west. In conclusion, the proposals are of an acceptable design.</p>	
<p><b>Transportation</b></p>	<p>HGY/2024/1203, 39 Queen Street, London, N17 8HZ Date: 17/09/2024</p> <p>Proposal: Redevelopment of Site for industrial and warehousing purposes (within Use Classes E(g)(ii), E(g)(iii), B2 and B8, with ancillary office accommodation together with access, service yard, car and cycle parking, landscaping, construction of a new substation, boundary treatments and other related works including demolition.</p> <p>Description</p> <p>An application has been received seeking planning permission to redevelop the site for industrial and warehousing uses (Use Classes E(g)(iii), B2 and B8. There will be an additional ancillary office accommodation along with a modified access, service yard, car and cycle parking. The development will also include a new substation and other related demolition works.</p> <p>The proposal site currently operates as a wholesaler that has 130 car parking spaces for both employees and customers. The site contains a c.10m vehicle entrance that fronts onto Queen Street and will be retained but will be modified with a separate pedestrian entrance to be added. The development would see to the provision of 27 car parking spaces, with 3 of these being designated for accessible bays. The development would look to provide 28 cycle spaces,</p>	<p>Support Noted. Condition 7,8,9,10,11 &amp;20 attached. Secured by S.106 obligations.</p>

Stakeholder	Question/Comment	Response
	<p>though no information has been provided in the distinction of both long and short- stay. 6 of the car parking space will be supported by electric vehicle charging points.</p> <p>The proposal site has a PTAL rating of 2-3 indicating that its access to public transport is reasonably good when compared to London as a whole suggesting that there will be a strong reliance on the private car for trip making. The site is located within the Northumberland Park West CPZ that restricts parking to permits holder Monday to Saturday 08:00 – 20:00, with further restrictions when events are taking at the local Hotspur Stadium. However, it should be noted that the Tottenham Event Day CPZ operates in nearby street, with restrictions not operating when events are not on.</p> <p>The proposal site fronts onto Queen Street which is an adopted highway with a speed limited of 20mph and has a width of approximately 6.8m, although at points is decreased to c.5m due to on-street resident parking bays. A camera enforced bus gate is located north of the site within Enfield Council. The proposal site has convenient access to shops, services, and transport links. It is well supported by cycle infrastructure with the site fronting onto Cycleway 1. White Hart Lane Overground Station is only around a 10min walk and a 2min bike ride. It should be noted that Silver Street Station is the other nearest other station, though services train services from this station also serve White Hart Lane Station. The site is served solely by the 318 single deck bus routes, although the W3 serves bus stops along White Hart Lane which provides access to the west of the borough.</p> <p>Commercial floorspace</p> <p>Existing: 5,036 sqm Proposed: 6,956 sqm</p> <p>Trip generation</p> <p>Trip information has been provided within the transport assessment. A combination of data from the 2011 census and TRICS sites have been used to develop the sites proposed trips and predicted modal split. The TRICS data makes use of 6 sperate sites for source data, though it should be noted that the proposed development is larger in size than 5 of the sites and none of the sites are within London therefore making comparability limited in scope. Separate trip data has been given for light and more intense industrial uses. The trip data from</p>	

Stakeholder	Question/Comment	Response
	<p>the more intense use will be used given that the site is an increase and is providing more loading bays for 16.5m HGVs.</p> <p>The highest mode share forecasted will be by public transport, with this representing 49% of all trips, the second highest would be car with 36% of the share, and thirdly walking would be by walking to the site. Commercial trip rates are discussed as part of the Service and Delivery, thus the net difference between proposed and existing uses will be examined. Two-way movements between 07:00-10:00 would see an increase of 23 vehicle trips and between 16:00-19:00 two-way movements would see an increase of 27 vehicles. Overall, the site is producing an increase in vehicle trips onto the local road network.</p> <p>Car parking</p> <p>The proposal would look to remove 130 parking space and provide 27 new spaces for employees, with 3 being allocated as disabled bays. The number of parking spaces will be allocated as follows:</p> <ul style="list-style-type: none"> <li>• Unit 1: 4 general spaces and 1 disabled bay.</li> <li>• Unit 2: 8 spaces and 1 disabled bay.</li> <li>• Unit 3: 12 spaces and 1 disabled bay.</li> </ul> <p>Planning policy requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan 2021 Policy T6.2 Office Parking requires that development proposals must comply with the relevant parking standards. For a development of this type, with a site wide PTAL rating of 2-3 the maximum car parking permitted would be 70 spaces, therefore the 27 spaces proposed are in accordance with this policy and the development will be capped at this level as it will help to ensure there is no car parking displacement onto the public highway.</p> <p>The London Plan 2021 T6.5 non-residential disabled persons parking states that disabled person parking should be provided in accordance with the levels set out within the policy. With at least access being provided to 1 on or off-street disabled persons parking bay. As a minimum 5% of the on-site car parking spaces must be designated disabled persons parking bay from the outset and 5% of bays should be enlarged. Thus, the proposal would need to provide at least 1 space and the 3 being provided is above this at a total of 12% of the allocation. Finally, all designated disabled bays and enlarged will need to be designed in accordance with the design guidance provided in BS8300: Vol 1.</p>	

Stakeholder	Question/Comment	Response
	<p>LBH Transport Planning will require a planning condition for a car parking management plan for the site's wider car parking provision and the 3 disabled car parking bays to understand how parking will be allocated and reviewed in line with a Travel Plan.</p> <p>Future parking demand</p> <p>A parking stress was conducted and has been submitted to support the application. It utilises the Lambeth Methodology covering an area of 200m from the site and was carried out over one day at the following times 06:00-10:00 and 15:00-19:00. The survey demonstrated that the morning parking stress levels were highest at 06:00 with 86% stress and the lowest at 09:00 with 61%. The afternoon survey showed was its highest at 19:00 with 75% and lowest at 15:00 with 50%. In all this shows that there is some availability within the vicinity of the site.</p> <p>The sites proposed on-site cycle parking has been assessed against the published London Plan 2021 Policy T5 Cycle parking standards for compliance. Policy T5 Cycle requires that developments 'provide the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located and be in accordance with the minimum standards. The proposed development would see the provision of 28 cycle spaces. With regards to policy requirements the developer has utilised B2-B8 cycle parking standards which requires the following numbers: 1 space per 500 sqm (GEA) for long-stay and 1 space per 1000 sqm (GEA) for short-stay. This means the developer would need to provide 15 long-stay and 7 short-stay. Consequently, the development is in accordance with this policy which is welcomed by LBH Transport Planning. A Transport Assessment addendum has been received which provides an exact breakdown in the number of parking, with 20 long-stay and 8 shorty-stay spaces.</p> <p>The location and design of the cycle parking has been provided within the Transport Assessment. The cycle parking will be located over 3 different locations at the front of each unit adjacent to the car parking allocation. All of the bike stores will utilise Sheffield stands, though these stands appear to be below the recommended 1.2. metre minimum within the LCDS for spacing between stands with it measuring less than 1 metre. Additionally, at least 5% of the bikes should be large enough to accommodate large cycles like a cargo bike, this would equate to 1 space and would assist with the sites sustainability for providing different methods of transport for deliveries. Further information has been received from the applicant which now shows the short stay cycle parking being separated and provided within a sheltered</p>	

Stakeholder	Question/Comment	Response
	<p>cycle stands on the northern most part of the site, the parking can be accessed by way of the pedestrian footway.</p> <p>Details relating to the bike store will be secured by a pre-commencement planning condition requiring the applicant to submit details of cycle parking spaces in line with the London Plan 2021 Policy T5 Cycle and Transport for London's London Cycle Design Standards (LCDS) which must be submitted and approved before development commences on-site.</p> <p>Electric vehicle charging</p> <p>The published London Plan 2021 does not have specific requirements for electric vehicle charging points for car parking for Use Classes such as this. However, as the site has used office car parking standards to determine the required amount of on-site car parking LBH Transport Planning will determine electric vehicle provision against the London Plan 2021 Policy T6.2 Office Parking which that 'Operational parking requirements should be considered on a case-by-case basis. All operational parking must provide infrastructure for electric or other Ultra Low Emission vehicles, including active charging points for all taxi spaces'. It is understood that the proposal would look to provide 3 electric charging points which would be positioned to serve 6 parking spaces. Although, it is not known whether the remaining spaces would be installed for passive provision for future charging capabilities. The added electric vehicle charging capabilities are welcomed, though all remaining spaces should have to passive provision. LBH Transport Planning will require a pre-commencement condition stipulating that a more detailed plan be submitted for approval showing 6 car parking spaces being supported with active, and 21 passive vehicle charging points.</p> <p>Access</p> <p>An Active Travel Zone (ATZ) has been produced and submitted as part of the Transport Statement. 5 walking routes to key destinations were analysed and assessed against the Healthy Streets indicators. These routes were:</p> <ul style="list-style-type: none"> <li>• Route 1: Site to/from North Middlesex Hospital Bus Stops.</li> <li>• Route 2: Site to/from Silver Street Overground Station.</li> <li>• Route 3: Site to/from the High Road.</li> <li>• Route 4: Site to/from White Hart Lane Overground Station.</li> </ul>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>Route 5: Site to/from Great Cambridge Road Post Office.</li> </ul> <p>Some of the recommendations for improvements to these routes include the installation of benches, new zebra crossings on Queen Street and Bull Lane, addition of seating for the bus stop at Somerset Road Stop P, covered bike stands on outside of Silver Street Station, inclusion of tactile on dropped kerbs on Queen Street, seating for White Hart Lane Bus Stop B, tree planting, and the installation of a dedicated cycle lane on White Hart Lane.</p> <p>The Transport Statement collision data has been used to understand the road environment near to the site for pedestrians and cyclists, the period covers from 30/04/2019 to 30/04/2024. 1 slight collision is recorded outside of the site entrance which involved a pedestrian in 2021 on Queen Street. A small cluster of 2 slight collision are seen on the roundabout southwest from the site on White Hart Lane. All larger collisions are further away from the site. No recommendations have been given on addressing any collision clusters.</p> <p>A new pedestrian gated access is to be created for the site, which will connect to a new 2m wide footway which will run along north of the site. The footway is to connect to a zebra crossing to allow pedestrians to pass safely to each unit without having to traverse the yard. Nonetheless, Unit 1 appears not to have such a connection, this places pedestrians at a disadvantage when trying to reach the unit and increases road danger risk. New information has been submitted showing that a crossing would be created connecting the unit to the footway on the northern side of the development.</p> <p>The applicant/developer will be required to make a contribution towards the enhancement of the footway to the west and east of the site given the site will see an increase in the number of larger vehicle movements that will cause further damage to the footways and the identified routes within the ATZ include White Hart Lane Overground station and the High Road. Additionally, the modal data split demonstrates of all trips to/from the site 49% of them will be via public transport with a further 11% by foot which is the third largest share. Whilst car travel only has a trip share of 36%. Because this data is from 2011 there would be significant changes to what has been recorded with the Transport Assessment as car use has generally seen a decline with increases in active travel and public transport usage. This is all further reinforced by the new internal pedestrian footway and entrance that will need connect to existing footway on the public highway. Therefore, the applicant/developer will be required to provide a contribution towards the reconstruction of the footway which will be secured via a S.106 obligation.</p>	

Stakeholder	Question/Comment	Response
	<p>Service and delivery.</p> <p>A Service and Delivery plan draft has been developed. All refuse collection will be conducted by a private operator following current arrangements. The site looks to have 8 HGV loading bays that will be serviced by 16.5m HGVs, the floorspace will see an increase of 27% from its existing size. No exact routing has been provided or proposed as part of the application for HGVs.</p> <p>The local road network is heavily residential in nature, though on White Hart Lane larger vehicles are travelling on that road presently. Nevertheless, the road does have cars parked on both sides of the road which means vehicles cannot pass each other and as there is little room to manoeuvre to allow vehicles to pass this does cause some delays to traffic, in particular buses when it does happen. Overall, if 16.5m HGVs are to be routed via routed southeast on White Hart Lane then tracking should be presented. New information has been provided by the developer stating that the existing site HGV deliveries do not have a set route that they travel by. Work conducted by LBH Highways has shown that 16.5 HGVs cannot make either turning onto White Hart Lane roundabouts west and east without damaging infrastructure. Consequently, it is reasonably to believe that HGV deliveries could be routed via either direction from the High Road or from the A10.</p> <p>Trip generation has been given which demonstrates that the development will generate the following:</p> <ul style="list-style-type: none"> <li>• 61 arrivals and 22 departures between 07:00-19:00</li> <li>• 33 arrival and 64 departures between 16:00-19:00</li> </ul> <p>The majority of these movements will be via 16.5m HGVs, with no details on how deliveries will be managed or timed to ensure that two vehicles do not meet when one is entering/exiting the site. swept paths have been given for all loading bays demonstrating how a 16.5m HGV would be able to reverse into a loading to leave in a forward gear. These drawings are found to be satisfactory.</p> <p>An internal turning head for vehicles like emergency vehicles to the west of the site. This is to allow vehicles to leave in a forward gear, outside of plans no more detail has been submitted. It is disappointing to see that the proposal for all three units has not examined other uses for</p>	



Stakeholder	Question/Comment	Response
	<p>movements to the site by sustainable deliveries (cargo bikes or electric vans) methods outside of the large 16.5m HGV vehicles which are an increase from present trip generation. This is not in accordance with the London Plan 2021 Policy T7 Deliveries, servicing and construction which states 'development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road'.</p> <p>The above issues can be addressed via the submission of a service and delivery plan to manage deliveries access to the site and to limit the number of trips to the site in order to manage the impact on the highway network.</p> <p>The development will see an increase in the number of deliveries made to the site by delivery vehicles which is predicted to have two-way movements in the AM peak of 30 and in the PM 26. This is an overall increase in number of two-way movements forecasted which will result in an increase of 14 during the peak hour. The Transport Assessment does not consider additional deliveries being made outside of the peaks. These vehicles will be forced to travel south via Queen Street as there is an existing bus gate north of the site forcing these vehicles to travel south towards White Hart Lane on LB Haringey's Road network. Tracking undertaken by Haringey has found both roundabout to be unsuitable for HGVs to traverse the roundabouts at the junction of White Hart Lane with Selby Road and the Junction of White Hart Lane with Creighton Road.</p> <p>Given the above issues highlighted with the roundabout combined with the existing width of the road and the existing parking on both sides of the road and the presence of a bus route we have some concerns with the proposed increase in the numbers of trips and the impact on the local highways network in particular the local bus route which provides access to North Middlesex Hospital. We will therefore be seeking improvement in the form of a S.278 obligation.</p> <p>The developer/applicant will be required to provide the council with detailed drawings with measure to mitigate the impacts of the scheme including but not limited to:</p> <ol style="list-style-type: none"> <li>1) Improvement to the roundabouts at the junction of White Hart Lane with Selby Road and the Junction of White Hart Lane with Creighton Road.</li> </ol>	

Stakeholder	Question/Comment	Response
	<p>2) Parking and layout and carriageway improvement to the section on White Hart Lane between the junction to White Hart Lane/ Junction with Selby Road to the site and or improvements to White Hart Lane from the junction with Crighton Road to the proposed site.</p> <p>3) We will also require the reinforcement/resurface of the crossover and carriageway on Queens Street to provide access to the site.</p> <p>The proposed improvements are required to facilitate the safe movement of HGV, and must be submitted to the Highway Authority for approval before any development commences on site, the scheme must include a Stage 1 and 2 road safety audits.</p> <p>Travel plan.</p> <p>A draft Travel Plan has been received which covers managing modes of travel for the site from employees. Baseline trip information has been provided for employee mode share data; the data has been derived from travel to work 2011 census data that due to its age may not be a realistic depiction of travel today. Therefore, a more balanced look should have been conducted with both the census data from 2011 and 2021. The data starts from the baseline year to year five, the year three data has not been provided making it difficult to understand how car use will be reduced by 10%. Furthermore, no hard measures have been suggested to lower car use e.g. increasing cycle parking, creating facilities, or reducing car use based upon review of on-site car parking usage. It does state that a travel plan will only be sought where more than 25 employees are being employed, nonetheless LBH Transport Planning will secure a site wide Travel Plan by S.106 obligation to be submitted before occupation and will require a monitoring fee paid per year for the first 5 years. Overall, the Travel Plan draft is excepted as a first step until a more comprehensive document can be received and reviewed.</p> <p>Construction and logistics</p> <p>A construction and logistics Plan (CLP) draft has been submitted. It sets out the principles of how the development will be built including: programme of works, vehicle routing/access, trip generation, monitoring, and existing road conditions. Construction is predicted to take approximately 12 months from the start of work, although before this can take place the access will need to be altered to allow for larger vehicles to enter/exit the site. The document proposes for pedestrian to proceed to the other side of the road on Queen Street when vehicles are</p>	

Stakeholder	Question/Comment	Response
	<p>making deliveries. However, this would be unacceptable as it places pedestrian and those with disabilities in a dangerous position to cross the road unless site personnel were to stop oncoming traffic from proceeding any further this would not be in accordance with the London Plan 2021 Policy T7 Deliveries, servicing and construction which states that 'during the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times'.</p> <p>The largest to visit the site will be a 16.5m HGV used for the purposes of deliveries, it will be able to enter and leave in a forward gear on-site, deliveries would need to be planned where they are not occurring at the same time of other vehicles needing access to the site. However, issue is found with the routing of these vehicles where they will proceed south from the site to the roundabout with White Hart Lane and Creighton Road, as the design of the roundabout itself and the wide turning it would need to achieve by to make the manoeuvre would be unsafe for larger vehicles. Tracking has been submitted demonstrating a 16.5m HGV turning onto the roundabout to/from site. Vehicles going towards the site will overrun the roundabout which is not acceptable as it would compromise highway/road safety. Therefore, this would not be in accordance with the published London Plan 2021 Policy T4 Assessing and mitigating transport impacts which states that 'development proposals should not increase road danger'.</p> <p>A Road Safety Audit (RSA) will need to be completed before any CLP related construction can begin, as it will inform decision making on the movement of larger 16.5m HGVs for the final CLP document. Finally, before construction has begun a general highway survey will need to be carried to ascertain the condition of the footway and highway and to determine if vehicle accesses will need to be reinforced.</p> <p>A fully detailed draft of a worked-up Construction Logistics Plan will be required for review and approval prior to commencement of any site works. The applicant will need to liaise and discuss intended means of access and servicing the site from the Highway with Haringey Council's Network Management Officers, and the outcomes of these conversations will need to inform the finished CLP.</p> <p>A CLP draft should include the following:</p> <ul style="list-style-type: none"> <li>• High provision of cycle parking for workers for all phases of construction to promote uptake of cycling to/from the site.</li> </ul>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>Given the sites connectivity to public transport which is demonstrated through its close proximity to public transport, and local parking restrictions no on-site car parking should be provided for workers.</li> <li>The following times, 08:00-09:00, 15:00-16:00, and 17:00-18:00, will need to be avoided by delivery and construction vehicles as to prevent vehicles from related to the development travelling when the road network is at its busiest because of school drop-off/pick-up times and peak road congestion.</li> <li>Effort should be made to have a process in place to deal with delivery/construction vehicles that turn up late or announced, as to prevent vehicles waiting on the public highway causing an obstruction or waiting on nearby residential streets given the sites location.</li> </ul> <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>Recommendation</p> <p>There are no highway objections to this proposal subject to the following conditions, S.106 and S.278 obligations.</p> <p>Conditions</p> <p>1. Delivery and Servicing Plan and Waste Management</p> <p>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>	

Stakeholder	Question/Comment	Response
	<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.  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.  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> <p>2. Cycle Parking</p> <p>The applicant will be required to submit plans showing accessible; sheltered, and secure cycle parking for 18 long-stay and 10 short-stay cycle parking spaces for approval. The quantity must be in line with the London Plan 2021 T5 Cycle and the design must be in line with the London Cycle Design Standard. No Development (including demolition) shall take place on site until the details have been submitted and approved in writing by the Council.  REASON: to be in accordance with the published London Plan 2021 Policy T5 Cycle, and London Cycle Design Standards (LCDS).</p> <p>3. Electric Vehicle Charging</p> <p>Subject to a condition requiring the provision of 3 active and 24 passive electric vehicle charging points to serve the on-site parking spaces from the onset.  Reason: to be in accordance with published Haringey Council Development Management DPD, Chapter 5 Transport &amp; Parking and the published London Plan 2021 Policy T6.2 Office Parking.</p> <p>4. Disabled parking bays</p> <p>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 Non-residential disabled person parking.</p> <p>5. Car Parking Management Plan</p>	

Stakeholder	Question/Comment	Response
	<p>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.</p> <p>S.106 obligations</p> <p>1. 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 Transport Planning to agree on a highway condition survey.</li> <li>h) Site logistics layout plan, including parking suspensions, turning movements, and closure of footways.</li> <li>i) Swept path drawings.</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>Reason: to ensure that the impacts of the development proposal on the local highways network are minimised during construction, and to coordinate construction activities in key regeneration areas which will have increased construction activities.</p> <p>2. Commercial Travel Plan</p> <p>A commercial travel plan must be secured for each unit by way of a 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, £15,000 (fifteen thousand pounds) 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. Highway Improvements</p> <p>The applicant will be required to enter into agreement with the Highway Authority under Section:</p> <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</p>	

Stakeholder	Question/Comment	Response
	<p>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:</p> <ol style="list-style-type: none"> <li>1) Improvement to the roundabouts at the junction of White Hart Lane with Selby Road and the Junction of White Hart Lane with Creighton Road.</li> <li>2) Parking and layout and carriageway improvement to the section on White Hart Lane between the junction to White Hart Lane/ Junction with Selby Road to the proposed site and or improvements to White Hart Lane from the junction with Crighton Road to the proposed site.</li> <li>3) We will also require the reinforcement/resurface of the crossover and carriageway on Queens Street to provide access to the site.</li> <li>4) The strengthening of the site's vehicle crossover to allow for an increase in HGV movements.</li> <li>5) Reconstruction of footways nearby to the site to mitigate deterioration caused by the development,</li> <li>6) Resurfacing of the carriageway outside of the site to ensure that the road network can support the increase in trips by HGVs.</li> </ol> <p>The scheme should be design in line with the 'Healthy Streets' indicators perspective, full list of requirements to be agreed with the Highways Authority. 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 improve accessibility to the site by foot and to ensure that the site is in accordance with the London Plan 2021 Policy T2 Healthy Streets and to implement highway works to facilitate future access to the development site.</p>	
<b>Carbon Management</b>	<p>Carbon Management Response 06/08/2024</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 Ltd (dated 12/04/ 2024)</li> </ul>	<p>Support noted, subject to condition 12,13,14,15 &amp; 28 and planning obligations</p>



Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>• Thermal Comfort Assessment prepared by Cudd Bentley Consulting Ltd (dated 18/03/2024)</li> <li>• Sustainability Section in DAS prepared by PRC Group (dated March 2024)</li> <li>• BREEAM Pre-Assessment prepared by Cudd Bentley Consulting Ltd (dated 12/04/2024)</li> <li>• Be lean BRUKL worksheets for all units, Be Green BRUKL worksheet for Unit 3 only.</li> <li>• GLA carbon emission reporting spreadsheet</li> <li>• Biodiversity Net Gain Assessment by Trident Building Consultancy (dated April 2024)</li> <li>• Landscape plans.</li> <li>• Relevant supporting documents.</li> </ul> <p>Required missing information:</p> <ul style="list-style-type: none"> <li>• Be Green BRUKL worksheets for Unit 1 and 2.</li> </ul> <p>1. Summary The development achieves a reduction of 132.52% carbon dioxide emissions on site, which is supported in principle. However, there are discrepancies for carbon emissions in all scenarios between the information stated in Energy Statement(ES) and the GLA carbon reporting spreadsheet, and this affects the overall carbon dioxide emission.</p> <p>We object to the Overheating Strategy as it currently does not use the correct methodology.</p> <p>Further clarifications must be provided with regard to the Energy Strategy, Overheating Strategy, Sustainability Strategy. The applicant must provide clarifications prior to determination. 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>secured via s106.</p>

Stakeholder	Question/Comment	Response																																																														
	<p>There are discrepancies between the Energy Strategy and the GLA Carbon Emission Reporting Spreadsheet for the regulated carbon emissions in all scenarios. The figures from the ES have been used for the purpose of preparing this report.</p> <p>The overall predicted reduction in CO2 emissions for the development shows an improvement of approximately 132.52% in carbon emissions, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 17.26 tonnes of CO2 from a baseline of 14.96 tCO2/year.</p> <p>London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are: 4.49 tCO2.</p> <p>Non-residential (SAP10.2 emission factors)</p> <table><tr><td colspan="4">Total regulated emissions</td></tr><tr><td>(Tonnes CO2 / year)</td><td colspan="3">CO2 savings</td></tr><tr><td>(Tonnes CO2 / year)</td><td colspan="3">Percentage savings</td></tr><tr><td>(%)</td><td colspan="3"></td></tr><tr><td>Part L 2021 baseline</td><td>14.96</td><td colspan="2"></td></tr><tr><td>Be Lean</td><td>12.39</td><td>2.56</td><td>17.15%</td></tr><tr><td>Be Clean</td><td>12.39</td><td>0</td><td>0%</td></tr><tr><td>Be Green</td><td>-4.86</td><td>17.26</td><td>115.38%</td></tr><tr><td>Cumulative savings</td><td></td><td>20.6</td><td>132.52%</td></tr><tr><td>Carbon shortfall to offset (tCO2)</td><td colspan="3">0</td></tr><tr><td>Carbon offset contribution + 10% management fee</td><td colspan="3">£95 x 30 years x 0 tCO2/year = £0 (N/A)</td></tr></table> <p>Actions:</p> <p>- Please refer to the table below to see the discrepancies between the ES and the GLA carbon emission reporting spreadsheet. Applicant to correct and provide revised calculations.</p> <table><tr><td>Total regulated emissions</td><td></td><td></td></tr><tr><td>(Tonnes CO2 / year)</td><td>From Energy Statement</td><td>From GLA carbon reporting spreadsheet</td></tr><tr><td>Part L 2021 Baseline</td><td>14.96</td><td>18.2</td></tr><tr><td>Be Lean</td><td>12.39</td><td>15.1</td></tr><tr><td>Be Clean</td><td>12.39</td><td>15.1</td></tr><tr><td>Be Green</td><td>-4.86</td><td>-2.5</td></tr></table>	Total regulated emissions				(Tonnes CO2 / year)	CO2 savings			(Tonnes CO2 / year)	Percentage savings			(%)				Part L 2021 baseline	14.96			Be Lean	12.39	2.56	17.15%	Be Clean	12.39	0	0%	Be Green	-4.86	17.26	115.38%	Cumulative savings		20.6	132.52%	Carbon shortfall to offset (tCO2)	0			Carbon offset contribution + 10% management fee	£95 x 30 years x 0 tCO2/year = £0 (N/A)			Total regulated emissions			(Tonnes CO2 / year)	From Energy Statement	From GLA carbon reporting spreadsheet	Part L 2021 Baseline	14.96	18.2	Be Lean	12.39	15.1	Be Clean	12.39	15.1	Be Green	-4.86	-2.5	
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	<ul style="list-style-type: none"> <li>- Please submit the missing Be Green BRUKL worksheets for Unit 1 and 2.</li> <li>- The notional building has assumed a certain amount of PV panels, this should reflect in the baseline calculation in the GLA carbon emission reporting spreadsheet. So, the “energy saving / generation technologies” cell under the Baseline column in the Carbon Emission Report Spreadsheet should not be 0.</li> <li>- In the Be Lean BRUKL worksheets for all units, the actual buildings have more PV panels’ energy production than the notional buildings. But the carbon emission savings from PV installations should only be included under Be Green stage, not Be Lean stage. The purpose is to clearly identify the percentage improvement of carbon emissions through the use of demand reduction measures alone.</li> <li>- The applicant has confirmed the main warehouse spaces have been modelled as unheated. Please identify the strategy how the buildings will be future proofed to allow the warehouse spaces to be used potentially as heated in the future?</li> </ul> <p>Energy Use Intensity (EUI) / Space Heating Demand (SHD)</p> <p>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 total energy consumed annually, but should exclude on-site renewable energy generation and energy use from electric vehicle charging.</p> <table> <tr> <td></td><td>Proposed Development</td><td>GLA Benchmark</td></tr> <tr> <td>Building type</td><td>Industrial</td><td>All other non-residential</td></tr> <tr> <td>EUI</td><td>Unit 1: 44.74 kWh/m2/year</td><td></td></tr> <tr> <td></td><td>Unit 2: 36.06 kWh/m2/year</td><td></td></tr> <tr> <td></td><td>Unit 3: 48.35 kWh/m2/year</td><td>Meet GLA benchmark of 55 kWh/m2/year</td></tr> <tr> <td>SHD</td><td>Unit 1: 11.8 kWh/m2/year</td><td></td></tr> <tr> <td></td><td>Unit 2: 5.3 kWh/m2/year</td><td></td></tr> <tr> <td></td><td>Unit 3: 14.99 kWh/m2/year</td><td>Meet GLA benchmark of 15 kWh/m2/year</td></tr> <tr> <td>Methodology used</td><td>SBEM</td><td></td></tr> </table> <p>Actions:</p>		Proposed Development	GLA Benchmark	Building type	Industrial	All other non-residential	EUI	Unit 1: 44.74 kWh/m2/year			Unit 2: 36.06 kWh/m2/year			Unit 3: 48.35 kWh/m2/year	Meet GLA benchmark of 55 kWh/m2/year	SHD	Unit 1: 11.8 kWh/m2/year			Unit 2: 5.3 kWh/m2/year			Unit 3: 14.99 kWh/m2/year	Meet GLA benchmark of 15 kWh/m2/year	Methodology used	SBEM		
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	<p>- The proposed EUIs and SHDs have met the GLA benchmarks. However given the applicant has confirmed that the main warehouse spaces are not modelled as heated, the EUIs and SHDs are in fact high. Applicant should improve the fabric efficiency measures to reduce these values.</p> <p>Energy – Lean</p> <p>The applicant has proposed a saving of 2.56 tCO<sub>2</sub> in carbon emissions (17%) through improved energy efficiency standards in key elements of the build, based on SAP2012 carbon factors. 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/m<sup>2</sup>K  External wall u-value 0.23 W/m<sup>2</sup>K  Roof u-value 0.15 W/m<sup>2</sup>K  Door u-value 1.60 W/m<sup>2</sup>K  Window u-value 1.40 W/m<sup>2</sup>K (Glazing)  G-value 0.36  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.  Waste Water Heat recovery? TBC  Thermal bridging 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.  Cooling system ASHP</p> <p>Actions:</p> <p>- The actual heating demands are higher than the notional heating demands in both Be Lean and Be Green scenarios on the BRUKL sheets. Applicant to provide a response to the questions below and submit revised calculations:</p> <p>o As per GLA energy assessment guidance, the energy systems are consistent across the baseline, Be Lean and Be Green stages but the efficiency values will vary. The efficiency</p>	

Stakeholder	Question/Comment	Response
	<p>of the proposed building systems will be same at the baseline and Be Lean stages. The actual proposed efficiency values will only be used in Be Green stage.</p> <ul style="list-style-type: none"> <li>o In the Be Lean stage, the proposed building fabric has a higher efficiency (e.g. U-values) than the notional buildings. And as the proposed buildings have the same efficiency of the notional building for the energy systems, the actual heating demands should be lower than the notional heating demands.</li> <li>o In Be Green stage, the proposed efficiency of the heat pump is higher than the notional value and also the total area of offices is larger than WCs and corridors, the improvement of heating demand due to the higher efficiency of the heat pump should outweigh the lower efficiency of electric panel heaters. Hence the actual heating demand should also be lower than that of the notional heating demand in Be Green stage.</li> <li>- Applicant to confirm if the ventilation strategy is natural ventilation for offices and main warehouse spaces. Applicant to confirm how will the passive ventilation might work in big warehouse spaces with deep plans.</li> <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> </ul> <p>Overheating is dealt with in more detail below.</p> <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>Applicant has submitted the evidence of discussion with Haringey council which confirmed there is no existing DHN connection available. However as noted in the pre-app, applicant should consult with Energetik about a possible future DHN connection. This may be possible to coordinate with the neighbouring Selby development site.</p>	

Stakeholder	Question/Comment	Response
	<p>Actions:</p> <ul style="list-style-type: none"> <li>– Applicant to submit evidence of discussion with Energetik. If it is viable, applicant to submit a site plan showing the connection point at the edge of the site, location of a pipe between the connection point and plant room, and plant room layout and schematics.</li> </ul> <p>Energy – Green</p> <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 17.26 tCO<sub>2</sub> (115.38%) reduction of emissions are proposed under Be Green measures.</p> <p>The solar array peak output for Unit 1, 2 and 3 would be 90 kWp, 110 kWp and 180 kWp correspondingly. With approximately 1014 panels, the total output is 380 kWp. The information about the amount of renewable electricity produced has not been provided.</p> <p>The communal air-to-air split system air conditioners (power inverter heat pump) has 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.</p> <p>Actions:</p> <ul style="list-style-type: none"> <li>- What is the assumed efficiency, angle and orientation of the panels?</li> <li>- Please provide some commentary on how the available roof space has been maximised to install solar PV, provide maintenance access and ensure safety on the roof.</li> <li>- How will the solar energy be used on site (before surplus is exported onto the grid)?</li> <li>- Applicant should develop a green lease agreement that tenants will be required to confirm to, and which will secure the building services performance assumed. For example, the agreement can include the requirements for future tenants to offset their unregulated energy emissions by installing additional PV panels.</li> <li>- Please identify on the plans where the air source heat pumps will be located and how the units will be mitigated in terms of visual and noise impact.</li> </ul>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- What is the Seasonal Coefficient of Performance (SCOP), the Seasonal Performance Factor (SPF) and Seasonal Energy Efficiency ratio (SEER) of the ASHP?</li> <li>- Please explain why the split system air conditioners do not appear to be linked to the hot water provision?</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> <ul style="list-style-type: none"> <li>- What are the unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters, battery storage?</li> <li>- Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: (<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>)</li> </ul> <p>3. Carbon Offset Contribution</p> <p>A carbon shortfall of 0 tCO<sub>2</sub>/year remains. The remaining carbon emissions will need to be offset at £95/tCO<sub>2</sub> over 30 years.</p> <p>4. Overheating</p> <p>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>	

Stakeholder	Question/Comment	Response																								
	<p>In accordance with the Energy Assessment Guidance, the applicant has undertaken a thermal comfort analysis that is used for BREEAM, in line with CIBSE AM11. This is undertaken with Predicted Mean Vote (PMV) and Predicted Percentage Dissatisfied (PDD) results for DSY1. This means that a dynamic thermal modelling assessment has not been undertaken in line with CIBSE TM52 with TM49 weather files. The report has modelled offices in all units only in the scenario of mechanically cooled spaces.</p> <p>Results are listed in the table below.</p> <p>Non-domestic (CIBSE AM11 – not the correct methodology) Occupied hours &gt; Maximum Threshold (3% of occupied hours exceeding the ±0.5 PMV range)</p> <table><tr><td></td><td>Unit 1 office</td><td>Unit 2 office</td><td>Unit 3 office</td></tr><tr><td>DSY1 2020s</td><td>Pass</td><td>Pass</td><td>Pass</td></tr><tr><td>DSY2 2020s</td><td>Pass</td><td>Pass</td><td>Pass</td></tr><tr><td>DSY3 2020s</td><td>Pass</td><td>Pass</td><td>Pass</td></tr><tr><td>DSY1 2050s</td><td colspan="3">Not provided</td></tr><tr><td>DSY1 2080s</td><td colspan="3">Not provided</td></tr></table> <p>All spaces pass the overheating requirements for 2020s DSY1 based on the use of 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>A revised overheating strategy is required.</p> <p>In addition, the noise levels may impact people being able to open their windows for night-time ventilation (both in proposed and existing dwellings adjacent to the development). This could therefore increase the risk of overheating to existing and future occupants.</p> <p>Actions:</p> <ul style="list-style-type: none"><li>- The applicant must submit a dynamic thermal modelling report that reports on results in line with CIBSE TM52.</li></ul>		Unit 1 office	Unit 2 office	Unit 3 office	DSY1 2020s	Pass	Pass	Pass	DSY2 2020s	Pass	Pass	Pass	DSY3 2020s	Pass	Pass	Pass	DSY1 2050s	Not provided			DSY1 2080s	Not provided			
	Unit 1 office	Unit 2 office	Unit 3 office																							
DSY1 2020s	Pass	Pass	Pass																							
DSY2 2020s	Pass	Pass	Pass																							
DSY3 2020s	Pass	Pass	Pass																							
DSY1 2050s	Not provided																									
DSY1 2080s	Not provided																									



Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>o Ensure that the London Weather Centre file has been used as this represents more accurately the urban heat island effort.</li> <li>o Please model the scenario of a naturally ventilated building with passive measures and openable windows before modelling any active cooling measures, and table the results accordingly. This needs to demonstrate that all passive measures have been maximised in line with the Cooling Hierarchy before using active measures.</li> <li>o Please model DSY1 for the 2050s and 2080s scenarios (future weather files). 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>- 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, especially in the areas with large windows.</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>- 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> <li>- Regarding the proposed uses and their associated noise levels, the applicant should seek to mitigate any impacts. Engagement with the neighbouring allocated site should be undertaken to ensure predicted noise levels are incorporated into noise assessment for cumulative impact and recommendations for window openings (in line with the AVO Residential Design Guide). Acoustic screening and/or other acoustic mitigation may be necessary to reduce impact, so this should be explored.</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 report sets out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design. The sustainability information submitted is high level.</p>	

Stakeholder	Question/Comment	Response
	<p>Non-Domestic BREEAM Requirement Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.</p> <p>The applicant has prepared a BREEAM Pre-Assessment Report. Based on this report, a score of 76.6% is expected to be achieved, equivalent to 'Excellent' rating. A potential score of 87.93% could be achieved, which would be equivalent to 'Outstanding'. This is supported.</p> <p>Urban Greening / Biodiversity 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> <ul style="list-style-type: none"> <li>- The Biodiversity Net Gain calculation shows a net gain of 48.36% in habitat units from the existing baseline, which is above the 10% requirement as set out in the Environment Act 2021.</li> <li>- The Urban Greening Factor is not required for industrial applications, although the applicant is encouraged to meet the indicative threshold.</li> <li>- Bird boxes and habitat piles have been proposed as well as planting including native plants around the perimeter of site, this is supported in principle.</li> <li>- A living roof is proposed on the flat roof part of the building, and several living walls along the southern elevation. All landscaping proposals and living roof 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 withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. Details will need to be submitted as part of a planning condition.</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>Action:</p> <ul style="list-style-type: none"> <li>- Clarify the type of living wall system that is proposed with indicative sections. How will the living walls retain the water, and be watered?</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> <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>Actions:</p> <ul style="list-style-type: none"> <li>- Has a Pre-Demolition Audit taken place to inform the quality of the existing property, materials and fittings that may be worth retaining?</li> <li>- The reuse of existing materials should be maximised. Please set out how this will be achieved on site and demonstrate the strategy has followed the waste hierarchy. Have all principles of circular economy been considered properly? Disassembly, adaptability, material reuse, building relocation, flexibility, replaceability, longevity, recycling?</li> </ul>	

Stakeholder	Question/Comment	Response
	<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 for 'Excellent' rating</li> <li>- Living roof and living walls</li> <li>- Biodiversity</li> </ul> <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>- Carbon offset contribution (and associated obligations) if the development does not meet the zero-carbon requirement; carbon offset contribution to be calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages plus a 10% management fee.</li> <li>- DEN connection (and associated obligations)</li> </ul> <p>Carbon Management Response 11/09/2024</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 (Rev P02, dated 27/08/2024), including GLA FAQ, Energetik correspondence and condenser location.</li> <li>• Energy and Sustainability Statement prepared by Cudd Bentley Consulting (dated 11/09 2024, Rev 04)</li> <li>• GLA carbon emission reporting spreadsheet</li> <li>• TM52 Report</li> <li>• Site plan showing future DEN connections</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. Previously there was a</p>	

Stakeholder	Question/Comment	Response																																												
	<p>discrepancy for the total regulated emissions between the ES and GLA carbon emission reporting spreadsheet (14.96 on ES and 18.2 on spreadsheet). Regardless which version is correct, it appears that the baseline has now increased to 20.9.</p> <p>To confirm, the development now achieves a 109% saving in regulated emissions from the baseline:</p> <table><tr><td colspan="4">Total regulated emissions</td></tr><tr><td>(Tonnes CO2 / year)</td><td colspan="3">CO2 savings</td></tr><tr><td>(Tonnes CO2 / year)</td><td colspan="3">Percentage savings</td></tr><tr><td>(%)</td><td colspan="3"></td></tr><tr><td>Part L 2021 baseline</td><td>20.9</td><td colspan="2"></td></tr><tr><td>Be Lean</td><td>3.6</td><td>17.2</td><td>83%</td></tr><tr><td>Be Clean</td><td>3.6</td><td>0</td><td>0%</td></tr><tr><td>Be Green</td><td>-1.8</td><td>5.4</td><td>26%</td></tr><tr><td>Cumulative savings</td><td></td><td>22.7</td><td>109%</td></tr><tr><td>Carbon shortfall to offset (tCO2)</td><td></td><td>0</td><td></td></tr><tr><td>Carbon offset contribution</td><td colspan="3">£95 x 30 years x 0 tCO2/year = £ 0</td></tr></table> <p>The unregulated energy has been calculated at 49,849 kWh per annum. The equivalent in tCO2/ year in total has not been provided.</p> <p>Actions:</p> <ul style="list-style-type: none"><li>- The unregulated energy in tCO2/year has not been updated in the submitted Energy Statement. Please provide this information.</li></ul> <p>Energy – Be Lean</p> <p>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>Actions:</p> <ul style="list-style-type: none"><li>- It is important to ensure the baseline model only uses the notional values while the Be Lean model uses the proposed U-values, so that the carbon reduction at Be Lean stage reflects the improvement in fabric efficiencies. However, the table extracted from the BRUKL</li></ul>	Total regulated emissions				(Tonnes CO2 / year)	CO2 savings			(Tonnes CO2 / year)	Percentage savings			(%)				Part L 2021 baseline	20.9			Be Lean	3.6	17.2	83%	Be Clean	3.6	0	0%	Be Green	-1.8	5.4	26%	Cumulative savings		22.7	109%	Carbon shortfall to offset (tCO2)		0		Carbon offset contribution	£95 x 30 years x 0 tCO2/year = £ 0			
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Stakeholder	Question/Comment	Response
	<p>worksheet below (using Unit 1 as an example) is the same across all stages. Please can applicant confirm if the fabric efficiencies of baseline and Be Lean have been modelled correctly?</p> <p>- The “actual” PV energy production from the Baseline is the same as the value on Be Lean BRUKL worksheet, this means the Be Lean modelling has included notional PVs. This will result in double-counting of the energy produced from the notional PVs in the Be Lean stage, for details please see annotated table below based on an extract from the carbon emission reporting spreadsheet (our annotation in red).</p> <p>While this would not affect the overall carbon reduction of the development, this has increased the reduction in Be Lean stage but decreased the reduction in Be Green stage. For the purpose of accuracy, please amend your Be Lean BRUKL and carbon emission reporting spreadsheet accordingly.</p> <p>Energy – Be Clean</p> <p>Applicant has submitted the evidence of discussion with Energetik that a future connection is welcomed, but connection at point of project completion would not be possible. As such the site will be future proofed when a connection becomes available at a later.</p> <p>A site plan has been submitted showing the future connection point, location of pipe between the connection point and plant room.</p> <p>Actions:</p> <p>– Please submit the carbon reductions from energy modelling with DEN scenario.</p> <p>Energy – Green</p> <p>Applicant has reported the assumed efficiency of the PV panel is 435W, and each panel will be included by 7 degrees and East facing.</p> <p>The electricity generated will be used to power HVAC and appliances within the building. Any excess electricity generated will be fed back into the grid.</p>	

Stakeholder	Question/Comment	Response															
	<p>Overheating</p> <p>The applicant confirmed the following:</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> <table><tr><td>Passive measures and openable windows only (no cooling)</td><td>Active cooling</td></tr><tr><td>Non-domestic: CIBSE TM52 Occupied hours &gt; Maximum Threshold</td><td></td></tr><tr><td>Occupied hours &gt; Maximum Threshold</td><td></td></tr></table> <table><tr><td>DSY1 2020s</td><td>Pass (for all offices)</td><td>Pass (for all offices)</td></tr><tr><td>DSY2 2020s</td><td>Pass (for all offices)</td><td>Pass (for all offices)</td></tr><tr><td>DSY3 2020s</td><td>Pass (for all offices)</td><td>Pass (for all offices)</td></tr></table> <p>Applicant has confirmed the active cooling demand is 132.99 MJ/m2.</p> <p>Actions:</p> <ul style="list-style-type: none"><li>- Please set out if there would be acoustic or air quality constraints to opening the windows as part of the overheating strategy.</li><li>- TM52 requires a development to pass two out of the three criteria. Please can applicant clarify if only criterion has been used for assessment? If so, please assess the development with one additional criterion and resubmit the report.</li></ul> <p>Conditions</p>	Passive measures and openable windows only (no cooling)	Active cooling	Non-domestic: CIBSE TM52 Occupied hours > Maximum Threshold		Occupied hours > Maximum Threshold		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)	
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Stakeholder	Question/Comment	Response
	<p>The following conditions are recommended to secure the benefits of the scheme. The Energy Condition is expected to be amended after applicant has further revised their Energy Statement.</p> <p>Energy Strategy</p> <p>(a) Prior to the commencement of development, a revised Energy Statement shall be submitted and approved by the Local Planning Authority. This shall be based on the submitted Energy and Sustainability Statement by Cudd Bentley (rev 04, dated 11th September 2024), delivering a minimum site-wide carbon emission reduction of 109% from a Building Regulations 2021 Part L compliant building, with high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 380 kWp solar photovoltaic (PV) array and inverter capacity. The revised strategy shall include the following:</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 fabric efficiencies will meet the targets proposed in the Energy and Sustainability Statement by Cudd Bentley (rev 04, dated 11th September 2024): <ul style="list-style-type: none"> <li><input type="checkbox"/> Floor U-value: 0.18 W/m2K</li> <li><input type="checkbox"/> External wall and internal partition U-value: 0.23 W/m2K</li> <li><input type="checkbox"/> Roof U-value: 0.15 W/m2K</li> <li><input type="checkbox"/> Door U-value: 1.6 W/m2K</li> <li><input type="checkbox"/> Window U-value: 1.40 W/m2K (glazing)</li> <li><input type="checkbox"/> G-value: 0.34</li> <li><input type="checkbox"/> Air permeability rate: 3 m3/hm2 @50Pa</li> </ul> </li> <li>- Detailed BRUKL calculations for the non-residential element of the development, demonstrating how it will exceed the 15% improvement on Building Regulations under Be Lean;</li> <li>- Details to reduce thermal bridging;</li> <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> </ul>	



Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <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 line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.</p> <p>DEN Connection Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:</p> <ul style="list-style-type: none"> <li>- Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.</li> <li>- Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;</li> <li>- A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>that needs to be removed or relocated and access routes for installation of the heat substation;</p> <p>- Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;</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 line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.</p> <p>Overheating</p> <p>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 (rev 02, dated 27th Aug 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</p> <p>(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:</p> <p>i) A roof plan identifying where the living roofs will be located;</p> <p>ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm);</p> <p>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</p>	

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	<p>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> <p>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);</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>BREEAM</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> <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</p>	

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	<p>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> <p>Biodiversity measures</p> <p>(a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall be based on the submitted Biodiversity Net Gain Assessment by Phlorum (rev 01, dated 15th April 2024) achieving overall net gain of 48.36% in habitat units from the existing baseline. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.</p> <p>(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.</p> <p>Development shall accord with the details as approved and retained for the lifetime of the development.</p> <p>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In</p>	

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	accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.	
<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 25 attached accordingly.
<b>Pollution</b>	Having considered the relevant applicant submitted information including; Design and Access Statement prepared by PRc Architecture & Planning; Energy and Sustainability Statement with reference 6753-CBC-IC-RP-S-001-P03, prepared by Cudd Bentley Consulting Ltd., dated 12 March 2024, taking note of the proposal to install an Air Source Heat Pump and Photovoltaic Panels; Air Quality Assessment with reference 579386.0000.0000.r1, prepared by TRC Companies Ltd. dated 26th March 2024 taking note of sections 3 (Scope and Methodology), 4 (Baseline Air Quality Conditions), 5 (Assessment), 6 (Mitigation Measures); Geotechnical and Geoenvironmental; Interpretative Report with reference CGL/10175 prepared by CGL Geotechnics Ltd., dated 22 March 2024 taking note of section 2 (Site Location), 3 (Historical Development), 6 (Preliminary Risk Assessment) 7 (Ground Investigation), 9 (Contamination Assessment), Geoenvironmental Recommendations) and Appendices A-N and Outline Construction Logistics Plan prepared by TTP Consulting, dated April 2024 taking note of 3 (Construction Programme and Methodology), 4 (Vehicle Routing and Access), 5 (Strategies to Reduce Impacts), 7 (Implementing, Monitoring and Updating),	Support noted. Condition 4,5 and 6 attached.

Stakeholder	Question/Comment	Response
	<p>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 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.</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 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 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 NOx 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> <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>	

Stakeholder	Question/Comment	Response
	<p>ix. Details of external lighting; and,  x. Details of any other standard environmental management and control measures to be implemented.  c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:  i. Monitoring and joint working arrangements, where appropriate;  ii. Site access and car parking arrangements;  iii. Delivery booking systems;  iv. Agreed routes to/from the Plot;  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  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  vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.  d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:  i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;  ii. Details confirming the Plot has been registered at <a href="http://nrmm.london">http://nrmm.london</a>;  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.</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>	



Stakeholder	Question/Comment	Response
<p><b>North Tottenham Area Regeneration Team</b></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> <p>Here are the formal comments from the North Tottenham Area Regeneration team on this application:</p> <p>The Selby Urban Village project is adjacent to the application site. A planning application for the project was submitted in mid-October. As such these two proposals are coming forward at the same time and may well impact each other both in construction logistics and end-user compatibility. The SUV project is being delivered as per the site allocation in the Tottenham Area Action Plan and so has been part of the council's Development Plan for some time.</p> <p>While the North Tottenham Area Regeneration team welcomes the improvements to boundary treatments and facades in this proposal, there are some concerns which it would like to see resolved through the determination of the application, to ensure that the site will continue to protect the residential amenity for both existing and proposed developments:</p> <ul style="list-style-type: none"> <li>Operating hours under the new proposal. No hours of operation are included in the application and no restrictions on servicing and deliveries are offered. There are also no measures to control noise outputs from the proposed plants. The new development is stated to be speculative and the uses proposed are flexible to be able to attract a wider range of tenants. Given this position, we ask that conditions be applied by the LPA requiring that the applicant must: <ul style="list-style-type: none"> <li>o attenuate the proposed service plant and keep it to within acceptable LBH noise limits (day and night time);</li> </ul> </li> </ul>	<p>Support noted. Condition 19,20,22,23, &amp; 24 to address issues raised.</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>o limit hours of operation and the timing of service and deliveries and prevent night-time servicing/ deliveries and unloading; and that,</li> <li>o lighting is controlled and that any floodlighting is shut off at night to prevent glare and impact on the surrounding area.</li> <li>• The retaining wall on the site's western elevation (adjacent to the Selby Urban Village site) is to be "kept or replaced" according to the application, however there is no more detail that this provided. There must be a condition added to ensure details of the proposed wall be submitted to the LPA and approved before commencement of the development.</li> <li>• Our understanding from the application is that access to the existing substation will be maintained through the Booker site, however we would like comfort that this is the position and that no access from the adjacent Selby Urban Village site would be required or expected.</li> <li>• The Selby Urban Village project includes a tree which must be preserved with a root protection area along the boundary with the application site. It is to the south next to the substation and we would like comfort that this won't be impacted by the application proposal.</li> </ul>	
<b>Flood &amp; Water Management</b>	<p>Thank you for consulting us on the above planning application reference number HGY/2024/1203 for the Redevelopment of Site for industrial and warehousing purposes (within Use Classes E(g)(ii), E(g)(iii), B2 and B8, with ancillary office accommodation together with access, service yard, car and cycle parking, landscaping, construction of a new substation, boundary treatments and other related works including demolition at 39, Queen Street, London, N17 8HZ</p> <p>Having reviewed the applicant's submitted Flood Risk Assessment and SuDS strategy report reference number 3202 Revision 4 dated 18th April 2024 as prepared by Heyne Tillet Steel consultant, we have no observation to make on the above planning application. We are satisfied that enough information have been submitted in terms of assessing the full planning application and if the site is to built, manage and maintain as per the above referred Flood Risk Assessment and SuDS strategy report, we are content that the impact of surface water drainage have been adequately addressed.</p>	Support noted condition 30 attached.
<b>Aboricultural</b>	<p>Town and Country Planning Act 1990  Town and Country Planning (Development Management Procedure) Order 2015</p> <p>Application No: HGY/2024/1203</p>	Support noted condition 22 attached.

Stakeholder	Question/Comment	Response
	<p>Proposal: Redevelopment of Site for industrial and warehousing purposes (within Use Classes E(g)(ii), E(g)(iii), B2 and B8, with ancillary office accommodation together with access, service yard, car and cycle parking, landscaping, construction of a new substation, boundary treatments and other related works including demolition. PS Type/Scale Major / General Industry, Storage, Warehousing Site Address: 39, Queen Street, London, N17 8HZ</p> <p>From an arboricultural point of view, I hold no objections to the above proposal.</p> <p>From the submitted details, street view and aerial images, there are adjacent line of conifer trees to the north, part of the south, and a few low grade trees on the west boundaries.</p> <p>No trees are to be felled.</p> <p>The existing trees have their root protection areas protected by the existing hardstand and can also be offset.</p> <p>A biological net gain assessment has rated the finished proposal at 0.38. A green roof is planned to the west of the new structure, and a detailed mater landscape plan along with a species list has been provided. 31 new trees are to be planted.</p> <p>We would like to see a specification for the new tree pits and a five year aftercare plan to establish independence in the landscape for the news trees and proposed planting.</p>	
<b>Noise</b>	<p>Noise Assessment Comments - HGY/2024/1203: :39 Queen Street London N17 8HZ</p> <p>I have reviewed the noise assessment (ref: AS13477.240320.NIA.1) provided in respect of the above development, namely the redevelopment of 39 Queen Street for industrial and warehousing purposes (within Use Classes E(g)(ii), E(g)(iii), B2 and B8, with ancillary office accommodation together with access, service yard, car and cycle parking, landscaping, construction of a new substation, boundary treatments and other related works including demolition.</p> <p>The applicant has undertaken an appropriate environmental sound survey and assessment of commercial noise and has considered “worst case scenarios” to provide a robust</p>	<p>Support noted conditions 23 &amp; 24 attached</p>

Stakeholder	Question/Comment	Response
	<p>assessment of potential impacts on residents at Allington Avenue and Selby Road and to address potential concerns about future tenants for all use classes.</p> <p>The applicant concludes no mitigation measures are necessary for the installation of plant. This is proposed for ground level and is likely to benefit from screening onsite so is likely to result in a low/ no impact for the nearest sensitive receptors. We accept this on the proviso that the plant is installed as outlined in the plans. To safeguard against any potential increase in plant, or a change to the plant to be installed, the condition (as outlined in section 4.10 of the report) should be included in the permission granted and the noise assessment repeated. The applicant concludes no mitigation measures are necessary for traffic noise or for the installation of plant. They have used modelled data to predict the commercial noise impact of HGVs which we have accepted.</p> <p>The applicant shall also be required to provide a Noise Management Plan which indicates how they will manage on site noise at noise sensitive times such as the use of reversing alarms, control of potential for public nuisance and the management of differing noise impacts of prospective tenants. This should be a dynamic document subject to review depending on the use of each unit and subject to review if there is a material change to the use of that unit in the future.</p> <p>Conditions:</p> <p>1. 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</p>	Support noted. S106 obligation attached.

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	<p>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 245 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>	
<b>EXTERNAL</b>	<p><b>Waste Comments</b></p> <p>With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. 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.  <a href="https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes">https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes</a></p> <p>We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: “A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 020 3577 9483 or by emailing <a href="mailto:trade.effluent@thameswater.co.uk">trade.effluent@thameswater.co.uk</a> . Application forms should be completed on line via <a href="http://www.thameswater.co.uk">www.thameswater.co.uk</a>. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p>	<p>Noted informative attached.</p>

Stakeholder	Question/Comment	Response
	<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>Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.</p> <p>Water Comments If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at <a href="http://thameswater.co.uk/building%20water">thameswater.co.uk/building water</a>.</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends 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</b> by	<p>Section 1 - Introduction:</p> <p>Thank you for allowing us to comment on the above planning proposal. With reference the above application we have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p>	Support noted condition 17 & 29 attached.

Stakeholder	Question/Comment	Response
	<p>We have not met with the project Architects or Agents to discuss Crime Prevention or Secured by Design (SBD). The Architects have not made mention in the Design and Access Statement with reference to design out crime, crime prevention, safety of lone women and girls, vulnerable young people and have not specified exactly what features of the design will reduce crime. There could be some conflict between the required access to the site, the recent bus stop traffic measure and the proposed Selby Centre planning application, and this requires a review. Whilst in principle we have no objections to the intention at the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can be easily mitigated early if the Architects or Managing Agency was to discuss this project prior to commencement, throughout its build and by following the advice given. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p>Section 2 - Secured by Design Conditions and Informative:</p> <p>In light of the information provided, we request the following Conditions and Informative:</p> <p>Conditions:</p> <p>(1) Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained.</p> <p>(2) Accreditation must be achieved according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development.</p> <p>Informative:</p> <p>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 or 0208 217 3813.</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. 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>	

Stakeholder	Question/Comment	Response
<b>Transport for London</b>	<p>TfL has the following comments:</p> <p>The closest section of the Transport for London Road Network (TLRN) is the A10 Great Cambridge Road which is located approximately 550m west of the site.</p> <p>White Heart Lane Overground Station is located approximately 530m southeast of the site. Closest bus stop is Trafalgar Avenue White Hart Lane providing service for one route, 318. The site has a Public Transport Accessibility Level of 2 to 3 representing a moderate level of accessibility.</p> <p>Cycleway 1 (C1) is located along the eastern frontage of the site along Queen Street.</p> <p>TfL welcome the obvious efforts to align with the Healthy Streets principles as highlighted through the completion of Healthy Streets checks for Designers and an Active Travel Zone Assessment. These have identified several improvements to be implemented to improve the accessibility and safety of the existing site, these include a new 2m wide footway along access road, improved lighting strategy and implementing green infrastructure within the proposed servicing yard. These improvements although welcomed are restricted to the site's boundary, LB Haringey should continue to work with the applicant to secure some of the active travel improvements suggested in the ATZ assessment.</p> <p><b>Car Parking</b></p> <p>The development proposes to reduce car parking provision from 130 spaces to 27 spaces with 3 of these taking the form of disabled car parking spaces. The provision is below maximum spaces permitted (68) in line with London Plan policy and the disabled car parking is in line with 3% minimum which is welcomed. The disabled parking spaces would be located in front of site entrances which is welcomed.</p> <p>Six car parking spaces would benefit from electric vehicle charging infrastructure which is welcomed. The Travel Plan should monitor usage of these spaces and increase provision of electric vehicle charging infrastructure if more is needed in line with policy T6.2-part C.</p> <p><b>Cycle Parking</b></p>	<p>Support noted and conditions 7,8,9 and 10 attached</p>



Stakeholder	Question/Comment	Response
	<p>The development proposes to provide 28 cycle spaces which exceeds minimum standards as outlined in the London Plan which is welcomed. Three cycle stores would be provided outside each warehouse within the public realm and consists of Sheffield stands promoting cycle use. Considering the site would generate a high frequency of Heavy Goods Vehicles (HGVs) movement especially during the AM and PM peaks and with excellent cycle access to the site provided by C1, the applicant should consider how cyclists would safely access the proposed stores and minimise conflict with larger vehicles therefore reducing road safety risks.</p> <p>In line with London Plan policy Part B, all cycle parking should be designed in accordance with London Cycling Design Standards (LCDS). At least 5% of provided cycle spaces should be in the form of enlarged stands to provide space for adapted cycles. We request further clarification on the aisle widths and spacings between Sheffield stands to ensure they adhere to LCDS.</p> <p>Access</p> <p>Wide footways and a zebra crossing are incorporated into the site layout which is welcomed from Healthy Streets perspective. Is there scope to implement an additional zebra crossing within the site but earlier on providing access to the first warehouse? Therefore, providing a more welcoming environment for pedestrians accessing the first unit giving them priority over cars and HGVs.</p> <p>Trip generation</p> <p>Trip generation assessments have been used with TRICS. Results from the commercial warehouse (class B8 use) demonstrate proposed development would generate an additional 10 two-way vehicle trips in the AM peak hour and 12 two-way vehicle trips in the PM peak hour (based on TRICS assessment of existing site as currently vacant). We find this would have a negligible impact on local highway network.</p> <p>Considering the site is vacant, to understand the impact on public transport network the overall trips should ideally be provided, not just the uplift (table 5.6). However, considering the scale of development and minimal projected uplift in bus, underground, and rail trips we find the impact acceptable.</p>	

Stakeholder	Question/Comment	Response
	<p>Delivery and servicing</p> <p>Provided Delivery and Servicing Plan (DSP) outlines that between 07:00-10:00 the site would receive 83 two-way movements and 97 two-way movements between 16:00-19:00. Swept path drawings provided demonstrate there is sufficient space for vehicles to arrive and depart in forward gear.</p> <p>The DSP highlights goods delivered to the site are to be scheduled to arrive outside peak hours which is welcomed in line with policy T7 part H.</p> <p>Construction</p> <p>An Outline Construction Logistics Plan has been provided. It mentions a maximum of 7 construction vehicles could visit the site daily at its peak (during sub phase which would last 3 months) and that construction works would take place for one year. In line with Vision zero and considering C1 is located along Queen Street, construction vehicles should pay particular attention to the presence of cyclists when performing left turns off Queen Street into the site and also when departing the site. Welcome to see Banksman and Traffic Marshalls are to be employed and that contractors would need be minimum level silver FORS and CLOCS accredited.</p> <p>To ensure safety for vulnerable road users pedestrian and wheelchair friendly footpaths must be maintained around the site at all times of construction period. It is noted pedestrians may be diverted onto the opposite footway on Queen Street when deliveries take place, obvious, legible and neurodiverse friendly signage as well as presence of trained traffic marshals should be provided in these circumstances.</p> <p>Construction vehicles would be scheduled to arrive in a staggered form to avoid congestion and also between 10:00 and 16:00 to avoid peak hours of traffic which is welcomed.</p> <p>Crushing onsite should be considered to consolidate vehicle movements.</p> <p>Travel Plan</p>	

Stakeholder	Question/Comment	Response
	<p>The proposed objectives are welcomed and generally align with Mayors Transport Strategy agenda of increasing percentage of trips made by walking and cycling. The proposed action targets are also reasonable and acceptable. The Travel Plan should also monitor usage of car parking bays equipped with electric vehicle charging infrastructure to monitor if more is needed.</p> <p>To encourage cycling the applicant should consider subsidising cycling equipment or hosting maintenance sessions such as Dr Bike. Similarly, to increase public transport trips and mode shifts away from the car, the applicant/tenants should consider subsidising public transport trips for instance through providing topped up oyster cards. These financial incentives would greatly contribute towards achieving 10% reduction in car use as main mode to travel to work target as outlined in the Travel Plan.</p> <p>Overall, TfL do not object to the proposed development in principle however request further information on how cyclists would safely access the site, introducing an additional crossing to the first unit, and for financial incentives to be included into the Travel Plan measures. Also, further discussions regarding securing active travel improvements, as identified in the ATZ assessment, are carried out with LB Haringey.</p>	
<b>Enfield Council</b>	<p>Thank you for your notification of the above development which was registered in this office on 8<sup>th</sup> May 2024.</p> <p>I have reviewed the information provided on your website and consider that the proposals would not have any strategic implications for this Borough.</p> <p>TOWN &amp; COUNTRY PLANNING ACT 1990.</p> <p>SCOPE OF WORKS: Redevelopment of Site for industrial and warehousing purposes (within Use Classes E(g)(ii), E(g)(iii), B2 and B8, with ancillary office accommodation together with access, service yard ,car and cycle parking, landscaping, construction of a new substation, boundary treatments and other related works including demolition.</p> <p>PREMISES: 39 QUEEN STREET TOTTENHAM LONDON N17 8HX .</p> <p>PLAN NUMBER(S) (if any): As planning portal. The, London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (as amended) in London. The</p>	Support noted.

Stakeholder	Question/Comment	Response
<p><b>The London Fire Authority</b></p>	<p>Commissioner has been consulted with regard to the above-mentioned premises and makes the following observations:  The Commissioner would be satisfied with the proposals providing the planning fire safety statement by BB7 Consulting Ltd dated 17/4/2024 &amp; the planning statement sections 4.34, 4.35 &amp; 6.60 dated 19/4/2024 are complied with.</p> <p>Other comments: As per Approved Document B B5 for (fire-fighter access &amp; facilities only). The Commissioner 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 Commissioner's 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. Please note that it is our policy to regularly advise our elected Members about how many cases there have been where we have recommended sprinklers and what the outcomes of those recommendations were. These quarterly reports to our Members are public documents which are available on our website.</p> <p>Any queries regarding this letter should be addressed to David Gregory. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.</p>	<p>Support noted.</p>

