

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2015/2650

Ward: Tottenham Hale

Address: Site of Former English Abrasives & Chemicals Ltd Marsh Lane N17 0XB

Proposal: New build refuse facility on existing site and associated outbuildings

Applicant: Mr Niall Tallis London Borough of Haringey

Ownership: Council

Case Officer Contact: Robbie McNaugher

Date received: 14/09/2015 **Last amended date:** NA

Drawing number of plans: 2040, 2041, 2042, 2234, 2235, 2236, 2237, 2330, 2331, 2332, 2700, 2726, 2741, 2743, 2900, 2901, 2902, 2903, 2410, 2411, 2726 and 2727

1.1 This application has been brought to committee because the Council is the landowner and applicant and the proposal is major development.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposal provides a modern employment use on the site and will release land for the regeneration of Tottenham Hale
- The proposal provides a sustainable, high quality functional design
- The level of parking is acceptable and the proposal would not impact on highway safety
- The proposal is acceptable in terms of flood risk and drainage
- The proposal complies with London Plan sustainability policy and would enhance biodiversity

2. RECOMMENDATION

2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management is authorised to issue the planning permission subject to the conditions and informatives set out below.

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) Construction management plan
- 5) Highway works
- 6) Travel Plan
- 7) Cycle parking
- 8) Electric vehicles
- 9) Biodiversity mitigation
- 10) Solar PV
- 11) BREEAM
- 12) Green/brown roofs
- 13) Landscaping
- 14) Boiler emissions
- 15) Air quality
- 16) Considerate contractors
- 17) Nitrogen dioxide levels
- 18) Contaminated land 1
- 19) Contaminated land 2
- 20) Source protection zone
- 21) Verification report
- 22) Contamination monitoring and maintenance
- 23) Contamination not previously identified
- 24) No infiltration
- 25) Foundation designs
- 26) Flood Risk Management Plan
- 27) London Underground safeguarding
- 28) Detailed surface water drainage scheme
- 29) Lighting

Informatives

- 1) Co-operation
- 2) CIL liable
- 3) Hours of construction
- 4) Street Numbering
- 5) Sprinklers
- 6) Thames water 1
- 7) Thames water 2
- 8) Thames water 3
- 9) Thames water 4
- 10) Thames water 5
- 11) Verification report
- 12) Asbestos

CONTENTS

- 3.0 PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS
- 4.0 CONSULTATION RESPONSE
- 5.0 LOCAL REPRESENTATIONS
- 6.0 MATERIAL PLANNING CONSIDERATIONS
- 7.0 RECOMMENDATION

APPENDICES:

Appendix 1: Consultation Responses

Appendix 2: Plans and images

3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1 Proposed development

3.1.2 This is an application for a new build refuse facility to replace the existing depot facilities at Ashley Road. This would consist of a building containing a double storey workshop and offices, salt store, refueling and washing facilities, storage and a parking area on permeable paving. The building would be finished in aluminium cladding with a continuous band of engineering brick at plinth level. There building would be 2 storeys with a green and brown roof and solar pv. The proposal would provide parking spaces for 53 HGVs, 26 SGVs, 29 LGVs and 56 staff spaces 3 of which would be accessible. Construction would take place in 2 phases. The first phase of the proposal would release land for the Sports Facilities proposed as part of the existing Harris Academy on the site of the former Lea Valley Techno Park with the second phase following later.

3.1.3 The proposal would remove all of the trees on the site and provide replacement landscaping at various points on the site. There would be 2 access points on Marsh lane for access and egress and an emergency access onto Watermead Way. The proposal would upgrade the existing public footpath to the west of the site.

3.2 Site and Surroundings

3.2.1 The application site lies between Marsh lane to the east and the A1055 (Watermead Way) dual-carriageway to the west. The size of the site is 1.8746 hectares. The site is enclosed on its North-West and South-West sides by The Northumberland Park LRT Depot which is the service and storage area for trains on the Victoria line. On its North-East boundary sits the Go Ahead London Northumberland Park Bus Depot, and finally on its South-Eastern edge Watermead Way. A public footpath runs the full length of the western boundary connecting Watermead Way and Marsh Lane.

3.2.2 Part of the site is currently used for overspill parking for the neighbouring Go Ahead Bus Depot. The site was previously occupied by a number of factory and store buildings with large areas of parking hard standing. With the exception of a small electrical sub-station to the north west corner of the site, all of the original buildings and a majority of the hard standings have been demolished, broken up and either removed from site or spread across the site. The site is predominately level except for a number of bunded lines of hardcore rubble, formed inside the Marsh Lane and Watermead Way boundaries. There are 3 semi-mature trees on the eastern boundary of the site and 1 on the eastern boundary.

3.2.3 The site lies within Flood Zone 2 defined as having a high probability of flooding, a Source Protection Zone 1, an Area of Archaeological Importance and a Strategic Industrial Location. The eastern edge of the site is within the Lea Valley Regional

Park and adjacent to an ecological Corridor and a Site of Importance for Nature Conservation (SINC)(Borough Grade I) and an area of Green Belt.

3.4 Relevant Planning and Enforcement history

3.4.1 A previous application for a similar use on the site was not determined as the Council did not wish to take the proposal forward-

HGY/2010/0048 - Demolition of existing industrial buildings and car parking areas, and redevelopment of site to create a new municipal depot for the London Borough of Haringey, including vehicle workshops with associated storage, security office, dog kennel, salt store, staff changing and muster facilities, offices and recycling centre, as well as operational, staff and public vehicle parking.

3.4.2 The application is subject to a Planning Performance Agreement (PPA) and a number of pre-application meetings have been held.

4. CONSULTATION RESPONSE

4.1 The following were consulted regarding the application:

LBH Arboriculturalist
LBH EHS - Noise & Pollution
LBH Flood and Surface Water
LBH Waste Management
LBH Parks
LBH Nature Conservation
LBH Economic Development
LBH Building Control
LBH EHS - Contaminated Land
LBH Transportation Group
LBH Food & Hygiene
Network Rail
London Wildlife Trust
London Fire Brigade
Lee Valley Regional Park Authority
Designing Out Crime Officer
National Rivers Authority
Health & Safety
Friends Of Tottenham Marshes
Transport For London
Friends Of The Earth
Environment Agency
London Underground Floor
Natural England
North London Waste Authority

Tree Trust For Haringey
Canal & River Trust
L. B. Waltham Forest
Thames Water Utilities
Greater London Archaeology Advisory Service

The following responses were received:

Internal:

- 1) Transportation

No objections subject to conditions

- 2) Flood and Surface Water

- 3) EH Pollution

No objections subject to conditions

- 4) Nature Conservation Officer

No objections subject to a condition to ensure light spill is minimised.

- 5) Carbon Management

No objections subject to conditions

- 6) Head of Emergency Planning and Business Continuity

No objections subject to conditions.

- 7) Waste Management

No objections

External:

- 8) The Environment Agency

No objections on Flood Risk

We recommend that finished floor levels for the proposed development are set as high as is practically possible, ideally 300mm above the 1 in 100 chance in any year including an allowance for climate change flood level, OR, where this is not practical, flood resilience / resistance measures are incorporated up to the 1 in 100 chance in any year including an allowance for climate change flood level.

9) Natural England

No comments received.

10) London Wildlife Trust

No comments received.

11) London Fire Brigade

Is satisfied with the proposals.

12) Lee Valley Regional Park Authority

No objection to the proposed scheme

The design of the layout is acceptable. The inclusion of the path is welcomed.

13) The Greater London Archaeological Advisory Service

No objections

14) Thames Water

No objections subject to informatives

15) London Underground

No objections

16) Network Rail

No objections

17) Designing out Crime Officer

No objections

18) North London Waste Authority

No comments received.

5. LOCAL REPRESENTATIONS

5.1 The following were consulted:

29 Neighbouring properties
1 Residents Association
6 site notices were erected close to the site

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

No of individual responses: 2
Objecting: 0
Supporting: 0
Others: 2

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

- Queries relating to existing recycling centre
- Comments around sustainability measures

6 MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of the development
2. Design
3. Parking and highway safety
4. Flood risk
5. Drainage
6. Energy and sustainability
7. Biodiversity and Trees

6.2 Principle of the development

6.2.1 The site is within a designated Strategic Industrial Location where as set out in Local Plan Policy SP8 the Council will protect B uses, support local employment and regeneration aims and contribute to a diverse north London economy including the need to promote green/waste industries. Saved UDP Policy EMP4 requires that the redevelopment or re-use of all employment generating land and premises should retain or increase the number of jobs permanently provided on the site, and result in wider regeneration benefits.

6.2.2 Draft DM Policy DM37 'Maximising the use of employment land and floorspace' continue this approach and states that proposals for the intensification, renewal and modernisation of employment land and floorspace will be supported where they improve and enhance the quality of the environment of the site and business area can demonstrable improvement in the use of the site for employment purposes particularly the contribution to the achievement of economic objectives

and outcomes set out in the Local Plan and the Councils other key plans and strategies.

6.2.3 The principle of a depot use on the site is considered acceptable as it would provide a modern employment use on site with potential for 116 staff on site. It would also facilitate the Council's regeneration aims for the Tottenham Hale area by releasing the existing Ashley Road depot to provide land for the sports facilities proposed as part of the existing Harris Academy on the site of the former Lea Valley Techno Park and the residential development on the remainder of the Ashley Road Depot as part of the district centre framework.

6.3 Design

6.3.1 Local Plan 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 Policies 7.4 and 7.6. Draft DM Policy DM1 'Delivering High Quality Design' continues this approach and requires development proposals to relate positively to their locality.

6.3.2 The existing site detracts from the visual amenity of the area, it is overgrown and the boundary treatment has been poorly maintained. The proposal would provide a comprehensive development of the site which although largely functional in design would significantly improve the appearance of the site. The development would consist of a single large building on the eastern part of the site and a large canopy further west with several smaller buildings across the site. The main building would accommodate two functions with offices and a workshop area. The building would be finished in aluminium cladding with a continuous band of engineering brick at plinth level. The building accommodates the 2 functions in one utilitarian but simple and functional structure. It would address Watermead way giving the site a street presence and reflect the surrounding utilitarian buildings, particularly the adjacent London Underground Depot. The canopy would be a simple functional structure and the ancillary buildings would not be highly visible in the area.

6.3.3 The proposal would include a large area of green and brown roof and landscaping of the site. There will be a 3 m high perimeter anti-climb fence around the site which will improve the appearance of the site boundaries while providing site security. The Met Policy Designing Out Crime Officer supports the proposal. The building would be fully accessible with level access and 2 lifts.

6.3.4 Overall the proposal is considered to successfully respond to its context and provide a high quality functional building which will enhance the visual amenity of the area.

6.4 Parking and highway safety

6.4.1 Local Plan (2013) 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 approach is continued in draft DM Policies DM31 and DM32.

6.4.2 The Council's Transportation Team has been consulted and advises that the site has a public transport accessibility of 2 (0 being the worst and 6b being the best). There are four (4) bus routes operating within the vicinity of the site. The frequencies of buses on the routes serving the site range from 4 to 12 vehicles per hour. The nearest bus stop is approximately 480m from the site in Northumberland Park. The closest rail station is Northumberland Park BR Station, which is approx. 400m from the site. The train service is a low-frequency service by London standards.

6.4.3 They note that although the PTAL rating of the site is classified as poor, the buses operating in the vicinity of the site provide good connectivity to nearby stations, such as Tottenham Hale and White Hart Lane rail stations. The site is therefore considered to have good bus accessibility.

6.3.4 Marsh Lane runs north-south for approx. 250m from its junction with Marigold Road to the site access. The width of the carriageway in Marsh Lane varies from 8m (adjacent to junction with Marigold Road) to 5.5m in the vicinity of the site entrance. Marsh Lane is subject to parking restrictions (double yellow lines) along its entire length. Kerbside parking in Marsh Lane is prohibited by the current traffic management orders. There is a continuous footway running along the east side of Marsh Lane, providing a pedestrian link to Marigold Road.

6.3.5 They also note that Marsh Lane and adjoining roads are included in the Tottenham Event Day CPZ (controlled parking zone) with controls operating on match days Monday to Friday 5:00PM – 8:30PM, Saturday/Sunday and bank holidays from Noon (12PM) – 4:30PM. In terms of parking provision the development includes a total of 164 parking spaces, which consists of: 24 LGV spaces; 58 HGV spaces including salt vehicles; 26 small vehicle spaces; and 56 staff car parking spaces. The proposal includes disabled car parking provision.

6.3.6 The Council's parking standards are set out in Appendix 1 of UDP 2006 (Saved March 2013). Saved UDP Policy M10 states that "development proposals will be assessed against the parking standards set out in Appendix 1. Proposals that do

not meet these standards will not normally be permitted.” However the policy further states that “parking requirement will be assessed on an individual basis and as part of a Transport Assessment in cases where this is deemed necessary according to Policy UD1.” Draft DM Policy DM 32 ‘Parking’ continues this approach and states that the Council will support proposals for new development with limited or no on-site parking.

- 6.3.7 The level of car parking under the proposal exceeds the maxima set out in Appendix 1. However, the proposal provides broadly the same level of car parking as the existing Ashley Road depot. Transport officers accept that this level of car parking is necessary to maintain the efficiency of the service. Moreover, the increase in the number of LGVs, HGVs and small vehicle parking spaces, within the overall parking provision is supported, and assumed to be necessary to improve operations at the facility. The London Plan (FALP, 2015) Policy 6.13 (supporting paragraph 6.48) recognises that operational parking is essential under some developments, to allow the developments to function. On the basis that the proposal relocates an existing service and retains the existing ‘operational’ parking, and is considered to be broadly consistent with policy, transport officers support the parking provision. The layout of the car park is considered to be acceptable.
- 6.3.8 London Plan Policy 6.13 provides that development should include electric vehicle (EV) charging points to encourage the uptake of electric vehicles. The policy requirement for EV charging points is 1 in 5 spaces (20%), with a minimum of 10% active and 10% passive. If this requirement were applied to the overall parking provision of 164 spaces, a minimum of 32 EV charging points (16 active and 16 passive) would be required. It is important to note that a large proportion (82 spaces) of the parking spaces is provided for HGVs and LGVs. These vehicles are not fuelled by electricity and it is therefore proposed that these spaces be exempt from this requirement. The remaining 82 parking spaces consist of small vehicle spaces and staff parking spaces – 26 and 56 parking spaces respectively. A provision of 16 EV charging points (8 active and 8 passive) would satisfy the London Plan requirements.
- 6.3.9 The information in the Transport Statement provides that 24 cycle parking spaces will be provided. The site layout plan contains three (3) sheltered cycle parking areas. The cycle parking provision exceeds the recommendations of the London Plan (FALP, 2015), which seeks a minimum overall provision of 15 cycle parking spaces (1 per 250sqm long-stay and 1 per 1,000sqm short-stay). The applicant will be required to increase the cycle parking provision should demand exceed the initial cycle parking provision. The level of cycle parking provision will be informed by the mode share for cycling observed in the annual travel surveys and the Travel Plan targets.
- 6.3.10 Vehicle access is provided via two (2) crossovers to facilitate one-way traffic movement through the site. The proposal retains the existing vehicle access,

which will serve as vehicle egress under the proposal. The north access is a new access. Vehicles will access the site via the north access and exit via the south (existing) access. The proposed traffic management arrangement is supported. This arrangement should minimise congestion in Marsh Lane, which might otherwise arise from vehicles waiting in Marsh Lane to give way to vehicles leaving the site.

6.3.11 It should be noted that there is a proposal to widen the carriageway in Marsh Lane. The proposed highway scheme encompasses widening the carriageway to 7.0m and provision of dropped kerb. The proposed widening will minimise congestion and improve pedestrian access along Marsh Lane. The scheme is welcomed by transport officers and is considered to be 'desirable' but not essential for the development to function. The proposed access and internal traffic management arrangements are also supported from the viewpoint of pedestrians and cyclists. Provision of a separate pedestrian access gate and segregated internal pedestrian paths will minimise pedestrian-vehicle conflicts within the site. Transport officers are satisfied with the steps taken by the applicant to create a safe pedestrian environment within the site. The new access must be constructed to the Council's standards, and any costs associated with the construction of the new vehicle access and modification of the existing access must be borne by the applicant.

6.3.12 The provision of a new emergency vehicle access and egress in Watermead Way has been considered. This new vehicles access is provided for emergency use only in the event that Marsh Lane is blocked. The Design & Access Statement briefly mentions the access but the Transport Assessment does not include any details on it. There is no objection to the principle of introducing a vehicle access in Watermead Way, for emergency use only. However, the emergency vehicle access in Watermead Way is subject to approval of an acceptable design by the Council's Highway Engineer's, and the cost of constructing this access being met by the applicant (as part of the s.278 works/payment). The only concern regarding this is access is the potential for it to be used by vehicles outside of emergencies, and consequently impacting unduly on traffic in Watermead Way. The applicant will need to ensure that adequate management is put in place to ensure that this does not happen.

6.3.13 There is a proposal to close the existing level crossing in Garman Road permanently. This proposal is likely to be implemented before the proposed depot becomes operational. The closure of this level crossing would mean that Marigold Road becomes the only access point for vehicles accessing the depots in Marsh Lane. This is likely to create an increase, albeit small, in the vehicles movement along Marigold Road.

6.3.14 Transport officers note that the current parking bays along Marigold Road are a hindrance to traffic. The width of the carriageway between the parking bays on Marigold Road can accommodate only one (1) HGV at a time. Given an expected

increase in HGV volume, it is recommended that the existing parking in Marigold Road be revised in order to ensure that two HGVs travelling in opposing directions can pass each other. The Council's Parking Services were consulted on the proposal and agreed with the principle of removing/modifying the existing parking in Marigold Road; subject to the prescribed procedure for amending the traffic management order and agreement by the applicant to pick up the cost of the TMO amendments.

6.3.15 The Transport Assessment includes a trip generation analysis which assesses the impact of the development on the adjoining road network. It should be noted that the development essentially consists of relocation of an existing service at Ashley Road. The TA includes data obtained from an ATC survey at the Ashley Road site to derive the trip generation data for the existing Ashley Road site, which is expected to be the same as the proposed site.

6.3.16 The results of the ATC survey at the Ashley Road site shows an average inbound and outbound vehicle movement of 555 and 581 vehicles, respectively, over a 24 hour period. The highest observed inbound vehicle movements were during the hours of 05:00-06:00 and 13:00-14:00 with 60 and 58 vehicles respectively. The highest observed outbound vehicle movements during the hours of 06:00-07:00 and 13:00-14:00 with 72 and 57 vehicle movements respectively. This suggests that the development peaks will be outside of the peak traffic periods. The TA assessed the impacts of the development on the following adjoining junctions: Watermead Way/ Marigold Road Signal Junction and Marsh Lane/ Marigold Priority Junction. The junction capacity assessment was done using the following traffic modelling software: LinSig for the signal junction and PICADY for the priority junctions. The junctions were modelled with background traffic flows for the 2015 and 2020 scenarios; and the 2020 assessment (with development) scenario.

6.3.17 The analyses of the junctions found that both junctions currently operate within capacity and that the operational capacity of the junction will not be adversely impacted by the development traffic. By comparison the analysis illustrates that the baseline 2015 practical reserve capacity for Watermead Way/ Marigold Road Signal Junction is 53% and 46% during the AM and PM peaks respectively. The practical reserve capacity under the 2020 assessment (with development) scenario finds that the reserve capacity for the junction will be 42% and 30% for the AM and PM peaks respectively. The results for Marsh Lane/ Marigold Junction demonstrate that this junction will not be seriously impacted by the development. This junction currently operates within capacity and will not be seriously affected by the development traffic. Based on the analyses of the adjoining junctions presented in the TA it can be concluded that the development will not adversely affect the operation of the adjoining road network.

6.3.18 The planning application is accompanied by a framework travel plan (FTP), which outlines the aims and objectives of the travel plan and proposes targets and

measures to achieve these aims and objectives. The FTP contains information on the local public transport, walking and cycle provisions, which will be used to formulate the Travel Plan (TP) targets and measures. It should be noted that the FTP does not present targets and measures specific to the site. These will be set out in the travel plan. The applicant is therefore required to develop a full travel plan which must be submitted to the Council for its approval and be in place on operation of the development.

6.3.19 In summary, the development is considered to be satisfactory in transport terms. The site has poor public transport accessibility rating because it is outside of the walking catchment of underground and rail stations. However, the site can be easily accessed by the bus routes operating in the vicinity. The level of parking is acceptable and complies with policy (London Plan 6.13; UDP Policy M10). The trip generation analysis found that the adjoining road network will not be severely impacted by the development. The access arrangements are supported and should minimise congestion in Marsh Lane. A revision to the current CPZ parking in Marigold Road is required, in order to minimise traffic congestion in Marigold Road. The proposed widening of the carriageway in Marsh Lane is supported but it is not necessitated by the development. The provisions for pedestrians and cyclists are acceptable. Transport officers support the development subject to the planning conditions.

6.5 Flood Risk

6.5.1 The site lies within Flood Zone 2 defined by the Environment Agency as having a medium probability of flooding. The NPPF, London Plan Policy 5.12, Local Plan SP5 and draft DM Policy DM24 advise that the Council will only consider development appropriate in areas at risk of flooding where accompanied by a site-specific flood risk assessment. The NPPF Technical Guidance identifies the proposal as 'more vulnerable' which is appropriate in Flood Zone 2 and a site-specific flood risk assessment (FRA) has been provided. The Environment Agency has reviewed the FRA and raises no objections

6.5.2 Paragraph 103 of the NPPF advises that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, (informed by a site-specific flood risk assessment) following the Sequential Test, and if required the Exception Test, it can be demonstrated that within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location and development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.

- 6.5.3 Paragraph 3.1.15 of Local Plan Policy SP1 states that the sites within the Tottenham Hale Growth Area have undergone the Sequential Test (and where necessary the Exception Test) in accordance with Planning Policy Statement 25 (which has been superseded by the NPPF). This has ensured that there are no alternative sites of lower flood risk where the development can be located. This is in accordance with Paragraph 104 of the NPPF which states that *“for individual developments on sites allocated in development plans through the Sequential Test, applicants need not apply the Sequential Test”*. Therefore subject to appropriate flood resilience and resistance the proposal is considered acceptable in terms of flood risk.
- 6.5.4 In this respect the Environment Agency recommend that finished floor levels for the proposed development are set as high as is practically possible, ideally 300mm above the 1 in 100 chance in any year including an allowance for climate change flood level, or, where this is not practical, flood resilience / resistance measures are incorporated up to the 1 in 100 chance in any year including an allowance for climate change flood level to protect the proposed development from flooding.
- 6.5.5 The applicant has demonstrated that the modelled 1 in 100 year (1%), 1 in 100 year + 20% Climate Change (1% + CC) and 1 in 1000 year (0.1%) flood levels remain below the finished floor level of the building and adjoining ground levels and therefore the proposed floor levels are considered acceptable to provide an appropriately flood resilient and resistant proposal.
- 8.6.5 With regard to evacuation arrangements the Council’s Head of Emergency Planning and Business Continuity has requested that prior to occupation the applicant provides a Flood Risk Management Plan for the site, this has been secured by a condition.
- 8.6.6 Therefore overall the proposal is considered acceptable within Flood Zone 3 and would comply with the sequential and exception tests. The proposal will be appropriately flood resilient and resistant, including by emergency planning. The proposal therefore complies with Local Plan SP5 London Plan Policy 5.12 the NPPF.

6.6 Drainage

- 6.6.1 London Plan (2011) Policy 5.13 'Sustainable drainage', Local Plan (2013) Policy SP5 'Water Management and Flooding' and draft DM Policy DM24 require developments to utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:
1. store rainwater for later use
 2. use infiltration techniques, such as porous surfaces in non-clay areas
 3. attenuate rainwater in ponds or open water features for gradual release
 4. attenuate rainwater by storing in tanks or sealed water features for gradual release
 5. discharge rainwater direct to a watercourse
 6. discharge rainwater to a surface water sewer/drain
 7. discharge rainwater to the combined sewer.
- 6.6.2 National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- 6.6.3 The applicant has provided a detailed drainage strategy and the proposal has incorporated infiltration and storage techniques including large areas of permeable paving, green and brown roofs and swales to attenuate water within the site. The Council's Drainage Engineers have reviewed the strategy and subject to further details of the maintenance and management they consider the approach to acceptable. This can be conditioned.
- 6.6.4 The site is located within a Source Protection Zone 1 where there is a risk of pollution to controlled waters. In this respect NPPF paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Paragraph 120 states that local policies and decisions should ensure that new development is appropriate for its location, having regard to the effects of pollution on health or the natural environment, taking account of the potential sensitivity of the area or proposed development to adverse effects from pollution.
- 6.6.5 The Environment Agency has therefore requested a Preliminary Risk Assessment and several conditions to protect groundwater quality. The applicant's drainage proposals have been design to ensure that groundwater is protected and the conditions set out by the EA have been attached.

6.7 Energy and Sustainability

- 6.7.1 The NPPF and London Plan Policies 5.1, 5.2, 5.3, 5.7, 5.8, 5.9, 5.10 and 5.11, Local Plan Policy SP4 and draft DM Policy DM21 set out the approach to climate change and requires developments to make the fullest contribution to minimizing carbon dioxide emissions. Local Plan Policy SP4 requires all new non-residential development shall be built to at least BREEAM “very good” standard and should aim to achieve BREEAM “excellent”.
- 6.7.2 The applicant has submitted a BREEAM pre-assessment which demonstrates the new development (59.82%) will provisionally achieve a BREEAM rating of ‘Very Good (min. 55%)’. A condition will be attached to ensure that prior to occupation the applicant provides a final Certificate to certify that BREEAM ‘very good has’ been achieved.
- 6.7.3 London Plan Policy 5.2 requires all new non-domestic buildings to provide a 35% reduction in carbon emissions. The applicant has submitted an energy statements which states that the energy hierarchy set out within the London Plan has been followed for this development to firstly reduce the energy demand followed by the incorporation of low energy lighting and efficient systems before the incorporation of decentralised and renewable technologies. The proposal has been designed by following this hierarchy and would incorporate some 300 sq.m of solar PV panels which would meet the carbon reduction target. A condition will be attached to ensure that these are provided prior to occupation.

6.8 Biodiversity and Trees

- 6.8.1 The eastern edge of the site is within the Lea Valley Regional Park and adjacent to an ecological Corridor and a Site of Importance for Nature Conservation (SINC) (Borough Grade I). London Plan Policy 7.19, Local Plan Policy SP13 and draft DM Policy DM19 require that where possible, development should make a positive contribution to the protection, enhancement, creation and management of biodiversity and should protect and enhance Sites of Importance for Nature Conservation (SINCs).
- 6.8.2 The applicant has provided a Phase 1 habitat survey and found the site to be of low ecological value. However, it was highlighted that the clearance of any mature vegetation should be carried out outside of bird nesting season or under the supervision of an ecologist. To provide a net gain in biodiversity the survey recommends that the design should incorporate two Schwegler 1B bird boxes and one Schwegler 1SP sparrow terrace. These mitigations and enhancements should lead to a net gain in biodiversity in accordance with the above policies and will be dealt with through a condition.

- 6.8.3 With regard to trees UDP (2006) Policy OS17 states that the Council will seek to protect and improve the contribution of trees, tree masses and spines to local landscape character by ensuring that, when unprotected trees are affected by development, a programme of tree replanting and replacement of at least equal amenity and ecological value and extent is approved by the Council.
- 6.8.4 The proposal would involve the removal of 4 existing trees on the site 2 are category B1 and 2 are category C1. These trees make some contribution to the landscape of the area but must be removed to provide the proposed layout. The proposal includes several areas of landscaping to mitigate this loss of trees and improve landscaping within the Lee Valley Regional Park and drainage within the site. There would be areas of wildflower-rich turf, grass, hedging and 6 trees. The scale and location of the proposed landscaping would be of greater amenity and ecological value so would improve the landscape character of the area including the Lee Valley Regional Park in accordance with Policy OS17.

6.9 Contaminated Land and Air quality

- 6.9.1 Saved Policy ENV1 and draft DM Policy DM32 require development proposals on potentially contaminated land to follow a risk management based protocol to ensure contamination is properly addressed and carry out investigations to remove or mitigate any risks to local receptors.
- 6.9.2 The applicant has submitted a Contaminated Land Assessment, The Council's Environmental Health Pollution Officer raises no objections subject to conditions. As noted above the drainage has been design to prevent an impact on the surrounding ground or surface water.
- 6.9.3 The site is close to a main road of air pollution concern (Watermead Way) a major route into London for which both monitoring and modelling indicates exceedences of the Government's air quality objectives for nitrogen dioxide (NO₂) and PM_{2.5}. In this respect draft DM Policy DM23 requires development to improve or mitigate its impact on air quality in the Borough and The London Plan, Policy 7.14 states that new development should:
- minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans
 - promote sustainable design and construction to reduce emissions from the demolition and construction of buildings;
 - be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as air quality management areas (AQMAs)).

- Ensure that where provision needs to be made to reduce emission from a development, this is usually made on-site.

6.9.4 The proposal includes green and brown roofs and areas of landscaping which will assist in improving air quality in the area. A proportion of the energy for the site would be provided from solar panels however there would be 2 gas boilers proposed. A condition has been attached to ensure these are low NO2.

6.9.5 In terms of the construction process an air quality and dust management plan (AQDMP), detailing the management of demolition and construction dust and controls of the emissions of construction vehicles can also be conditioned to ensure that the proposal does not have a material impact on air quality. Overall the proposal is considered acceptable in this respect.

6.10 Archaeology

6.10.1 London Policy 7.8 states that “development should incorporate measures that identify record, interpret, protect and, where appropriate, present the site’s archaeology” and UDP Policy CSV8 and draft DM Policy DM9 restrict developments if it would adversely affect areas of archaeological importance.

6.10.2 The Greater London Archaeological Advisory Service (GLAAS) has been consulted and raise no objections to the proposal.

6.11 Impact on the amenity of adjoining occupiers

6.11.1 The London Plan 2011 Policy 7.6 *Architecture* states that development must not cause unacceptable harm to the amenity of surrounding land and buildings. Saved Policy UD3 also requires development not to have a significant adverse impact on residential amenity in terms of loss of daylight, or sunlight, privacy overlooking, aspect noise, pollution and of fume and smell nuisance. Draft DM Policy Policy DM1 ‘Delivering High Quality Design’ continues this approach and requires developments to ensure a high standard of privacy and amenity for its users and neighbours.

6.11.2 The nearest residential properties are some 140 metres to the west of the site and the access road to the site is not shared with residential dwellings. Therefore it is considered that the proposal would not impact on neighbouring amenity.

6.12 Conclusion

6.12.1 The principle of a depot use on the site is considered acceptable as it would provide a modern employment use and also facilitate the Council’s regeneration aims for the Tottenham Hale area. The proposal would provide a sustainable, high quality and functional design which would enhance the visual amenity of the

area. The level of parking is acceptable and the proposal would not impact on highway safety. The proposal is acceptable in terms of flood risk and drainage. The proposal complies with London Plan sustainability policy and would enhance biodiversity and improved landscaping would mitigate for the loss of existing trees. The proposal is acceptable in terms of air quality and contamination. There would be no impact on neighbouring amenity of archaeology.

6.12.2 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION

6.6 CIL

6.6.1 Based on the information given on the plans, the Mayoral CIL charge will be £105,980 (3,028 sqm x £35) and the Haringey CIL charge will be £0 (This type of development is charged at a nil rate). 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. An informative will be attached advising the applicant of this charge.

8.0 RECOMMENDATIONS

GRANT PERMISSION subject to conditions and informatives as set out below

Applicant's drawing No.(s) 2040, 2041, 2042, 2234, 2235, 2236, 2237, 2330, 2331, 2332, 2700, 2726, 2741, 2743, 2900, 2901, 2902, 2903, 2410, 2411, 2726 and 2727

Subject to the following condition(s)

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

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

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

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

3. Notwithstanding the information submitted with this application, no development shall take place until precise details of the external materials to be used in connection with the development hereby permitted be submitted to, approved in

writing by and implemented in accordance with the requirements of the Local Planning Authority and retained as such in perpetuity.

Reason: In order to retain control over the external appearance of the development in the interest of the visual amenity of the area and consistent with Policy SP11 of the Haringey Local Plan 2013 and Saved Policy UD3 of the Haringey Unitary Development Plan 2006.

4. Prior to the commencement of construction works a Construction Management Plan (CMP) and Construction Logistics Plan (CLP) shall be submitted for the local authority's approval. The Plans should provide details on how construction work (including any demolition) would be undertaken in a manner that disruption to traffic and pedestrians in the surrounding roads is minimised. It is also requested that construction vehicle movements should be carefully planned and co-ordinated to avoid the AM and PM peak periods.

Reason: In order to ensure that the proposed development does not prejudice the free flow of vehicular and pedestrian traffic or the conditions of general safety of the highway consistent with Policy 6.13 of the London Plan 2011 and Saved Policies UD3 and M10 of the Haringey Unitary Development Plan 2006.

5. Phase 2 (as set out on plan no. 2743 PL2) of the development shall not be occupied until any essential highways works are complete, the highway works might include, but are not limited to, alterations to the existing carriageway in Marsh Lane (in accordance with the LB Haringey proposed widening scheme for Marsh Lane), footway renewal or construction, access to the Highway (including Watermead Way), amendments to the existing Traffic Management Orders (TMOs) in Marsh Lane and Marigold Road. Any essential highway works will be carried out by the Council at the applicant's expense.

Reason: In the interests of maintaining highway safety and providing for the smooth flow of traffic, as well as minimising parking effects.

6. The development hereby permitted shall not be occupied until such time as a Workplace Travel Plan has been provided to the Council's travel plan co-ordinator and an agreement has been reached to monitor the travel plan initiatives annually (at a cost of £3,000). The approved travel plan shall be implemented prior to first occupation of the development hereby permitted. The developer must submit a travel plan, annually for a period of no less than 5 years.

7. The applicant shall provide cycle storage for the secure parking of 24 bicycles within the site, as shown on the plans hereby approved. The cycle parking hereby approved must be in place before the first occupation of the development.
Reason: to ensure that a reasonable provision is made within the site for the parking of bicycles in the interest of relieving congestion in the surrounding streets and towards promoting sustainable travel.

8. Prior to the commencement of phase 2 (as set out on plan no. 2743 PL2) of the development, details of the provision for electric vehicle charging points for 5 vehicles and passive provision for a further 5 shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented in full prior to the first occupation of the premises and retained thereafter in perpetuity.

Reason: To provide facilities for Electric Vehicles and to encourage the uptake of electric vehicles consistent with Policy 6.13 of the London Plan 2011 and Policies SP0 and SP4 of the Haringey Local Plan 2013.

9. The development hereby permitted shall be built in accordance with the recommendations of the Phase 1 habitat survey and the proposed biological enhancements installed prior to the occupation of phase 2 of the proposal and retained thereafter in perpetuity.

Reason: To ensure that the development will make a positive contribution to the protection, enhancement, creation and management of biodiversity and protect and enhance the adjoining Site of Importance for Nature Conservation (SINCs) in accordance with London Plan Policies Policy 7.19 and Local Plan Policy SP13.

10. The development hereby permitted shall be built in accordance with the approved renewable energy statement and the energy provision shall be thereafter retained in perpetuity without the prior approval, in writing, of the Local Planning Authority.

Reason: To ensure that a proportion of the energy requirement of the development is produced by on-site renewable energy sources to comply with Policy 5.7 of the London Plan 2011 and Policies SP0 and SP4 of the Haringey Local Plan 2013.

11. Evidence that each element of the development is registered with a BREEAM certification body and that a pre-assessment report (or design stage certificate with interim rating if available) has been submitted indicating that the development can achieve the stipulated BREEAM level 'Very good' shall be presented to the local planning authority within 6 weeks of the date of this decision and a final certificate shall be presented to the local planning authority within 6 months of the occupation of the development.

Reasons: To ensure that the development achieves a high level of sustainability in accordance with Policies 5.1, 5.2, 5.3 and 5.15 of the London Plan 2011 and Policies SP0 and SP4 the Haringey Local Plan 2013.

12. No part of phase 2 (as set out on plan no. 2743 PL2) shall commence until details of a scheme for green and brown roof(s) for the development hereby

permitted have been submitted to and approved in writing by the Local Planning Authority. The details shall include its (their) type, vegetation, location and maintenance schedule. The development shall be implemented in accordance with the approved scheme prior to its first occupation and the vegetated or green roof shall be retained thereafter. No alterations to the approved scheme shall be permitted without the prior written consent of the Local Planning Authority.

Reason: To ensure a sustainable development consistent with Policy 5.11 of the London Plan 2011 and Policies SP0, SP4 and SP11 of the Haringey Local Plan 2013.

13. No development shall commence until a scheme for the treatment of the surroundings of the proposed development including the timescale for the planting of trees and/or shrubs and appropriate hard landscaping has been submitted to and approved in writing by the Local Planning Authority. The development hereby permitted shall be implemented in accordance with the approved details.

Reason: In order to provide a suitable setting for the proposed development in the interests of visual amenity consistent with Policy 7.21 of the London Plan 2011, Policy SP11 of the Haringey Local Plan 2013 and Saved Policy UD3 of the Haringey Unitary Development Plan 2006.

14. Prior to commencement of the development, details of the 2No. 67kW gas-fired boilers must be submitted to evidence that the units to be installed comply with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for developments in Band B.

Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction

15. No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment.

Reason: To Comply with Policy 7.14 of the London Plan

16. Prior to the commencement of any works the site or Contractor Company is to be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA.

Reason: To Comply with Policy 7.14 of the London Plan

17. All plant and machinery to be used at demolition and construction phases is required to meet Stage IIIA 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 <http://nrmm.london/> Proof of registration must be submitted prior to the commencement of any works on site.

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.

Reason: To comply with Policy 7.14 of the London Plan and the requirements of the Greater London NRMM LEZ.

18. Before development commences other than for investigative work:
- a) A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority.
 - b) If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. This shall be submitted to, and approved in writing by the Local Planning Authority prior to that investigation being carried out on site. The investigation must be comprehensive enough to enable:-

a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.

The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.
 - c) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any

post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.

Reason

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

19. 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.

20. No development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), shall take place until a scheme that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

1) A preliminary risk assessment which has identified:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site.

2) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken. 4)

A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To protect controlled waters. The site is located in a Source Protection Zone 1 and on a secondary aquifer.

21. No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To protect groundwater.

22. No development should take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local Planning Authority shall be submitted to and approved in writing by the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that all long-term remediation works have been carried out and confirming that remedial targets have been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To protect groundwater quality. Previous report described in the letter from ESG indicate free phase hydrocarbon contamination is present on the site. A minimum of 3 groundwater monitoring rounds are required to determine groundwater flow direction.

23. 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 the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reasons: To protect groundwater. No site investigation fully characterises a site. Not all of the site area was accessible during the investigations to date.

24. No infiltration of surface water drainage into the ground at this site is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To protect groundwater. Infiltrations SUDs/ soakaways that bypass the soil layers are unacceptable they create preferential pathways for contaminants to migrate and cause groundwater pollution.

25. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is not resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To protect groundwater quality. Some piling techniques can cause remobilisation of contaminants and/or cause preferential pathways for contaminants to migrate & pollute groundwater.

26. Prior to the occupation of the development hereby permitted, a Flood Risk Management Plan (FRMP) shall be submitted to and approved in writing by the Planning Authority. The FRMP shall include details of how the design will incorporate elements of resilience to prevent water ingress, protection of key building services (electricity and heating), safe evacuation methods, assembly point, arrangements to relocate guests without recourse to local authority support and an agreed monitoring programme. Thereafter the FRMP shall be implemented.

Reason: To ensure that adequate evacuation arrangements are in place at times of flood in the interests of public safety and to comply with Paragraph 103 of the NPPF and Local Plan SP5.

27. The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- provide details on all structures
- accommodate the location of the existing London Underground structures
- there should be no opening windows facing the LU elevation

- demonstrate access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering our land
- demonstrate that there will at no time be any potential security risk to our railway, property or structures
- accommodate ground movement arising from the construction there of mitigate the effects of noise and vibration arising from the adjoining operations within the structures

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2011 Table 6.1 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

28. No development shall take place until a detailed surface water drainage scheme for site, which is based on sustainable drainage principles and an assessment of the hydrological and hydro-geological context of the development, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including the 1 in 100 year plus 30% for climate change critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. The scheme shall include details of its maintenance and management after completion and shall subsequently be implemented in accordance with the approved details before the development on Site is occupied. No building or use hereby permitted shall be occupied until the sustainable drainage scheme for this site has been completed in accordance with the submitted details. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan.

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal and maintained thereafter.

29. The proposed development shall not be brought into use until measures to avoid unacceptable lightspill beyond the site perimeter have been provided in and approved in writing by the Local Planning Authority and thereafter retained in perpetuity.

Reason: To ensure that the proposal will make a positive contribution to the protection and enhancement of biodiversity in accordance with London Plan Policy 7.19 and Local Plan Policy SP13.

Informatives:

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

INFORMATIVE : CIL

Based on the information given on the plans, the Mayoral CIL charge will be £105,980 (3,028 sqm x £35) and the Haringey CIL charge will be £0 (This type of development is charged at a nil rate). 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 :

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: 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 5573) to arrange for the allocation of a suitable address.

INFORMATIVE: 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:

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: 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.

INFORMATIVE: There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the options available at this site.

INFORMATIVE: 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.

INFORMATIVE: There is a Thames Water main crossing the development site which may/will need to be diverted at the Developer's cost, or necessitate amendments to the proposed development design so that the aforementioned main can be retained. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.

INFORMATIVE:

With regard to condition 21 the verification report should be prepared with consideration of the EA guidance:

<https://www.gov.uk/government/publications/verification-of-remediation-of-land-contamination> (Note to applicant: the verification report can also support the baseline quality for an Environmental Permit application site condition report).

INFORMATIVE:

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.

Appendix 1 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Transportation	<p><u>Transport Context</u></p> <p>The development site is located in Marsh Lane. The site is currently a vacant site of 1.85 hectares. There are several operational depots in the area, which take access from Marsh Lane. To the south of the development site is a depot that forms part of the Northumberland Park Depot, which is used for storing and servicing London Underground Victoria Line trains. To the north of the site is a depot that is part of the Northumberland Park Depot, which is used for servicing the London Go Ahead Bus Group double-decker fleet.</p> <p>The site has a public transport accessibility of 2 (0 being the worst and 6b being the best). There are four (4) bus routes operating within the vicinity of the site. The frequencies of buses on the routes serving the site range from 4 to 12 vehicles per hour. The nearest bus stop is approximately 480m from the site in Northumberland Park. The closest rail station is Northumberland Park BR Station, which is approx. 400m from the site. The train services vary from 0.33 to 1 train per hour, which is a low-frequency service by London standards.</p> <p>Although the PTAL rating of the site is classified as poor, the buses operating in the vicinity of the site provide good connectivity to nearby stations, such as Tottenham Hale and White Hart Lane rail stations. The site is therefore considered to have good bus accessibility.</p> <p>Marsh Lane runs north-south for approx. 250m from its junction with Marigold Road to the site access. The width of the carriageway</p>	Noted conditions attached.

Stakeholder	Question/Comment	Response
	<p>in Marsh Lane varies from 8m (adjacent to junction with Marigold Road) to 5.5m in the vicinity of the site entrance. Marsh Lane is subject to parking restrictions (double yellow lines) along its entire length. Kerbside parking in Marsh Lane is prohibited by the current traffic management orders. There is a continuous footway running along the east side of Marsh Lane, providing a pedestrian link to Marigold Road.</p> <p>Marsh Lane and adjoining roads are included in the Tottenham Event Day CPZ (controlled parking zone) with controls operating on match days Monday to Friday 5:00PM – 8:30PM, Saturday/Sunday and bank holidays from Noon (12PM) – 4:30PM.</p> <p><u>Description of Development</u> The proposal essentially constitutes the relocation of the existing Haringey Council’s Waste Management services, which currently operates at the Ashley Road depot site, approx. 900m from the proposed Marsh Lane depot site.</p> <p>The Marsh Lane depot site will provide the following facilities: (i) 2,174sqm portal from depot building to house a workshop, a garage and an office; (ii) 540sqm fuel/wash building; (iii) 340sqm salt store; (iv) a parks storage area; (v) a street storage area; (vi) 375sqm site storage area; (vii) a site office which will be located adjacent to the depot building; (viii) parking within the yard to accommodate staff demand and LGVs and HGVs.</p> <p><u>Parking Provision</u> The development includes a total of 164 parking spaces, which consists of: 24 LGV spaces; 58 HGV spaces including salt vehicles; 26 small vehicle spaces; and 56 staff car parking spaces. The proposal includes disabled car parking provision.</p>	

Stakeholder	Question/Comment	Response
	<p>The Council’s parking standards are set out in Appendix 1 of UDP 2006 (Saved March 2013). Saved UDP Policy M10 states that “development proposals will be assessed against the parking standards set out in Appendix 1. Proposals that do not meet these standards will not normally be permitted.” However the policy further states that “parking requirement will be assessed on an individual basis and as part of a Transport Assessment in cases where this is deemed necessary according to Policy UD1.”</p> <p>The level of car parking under the proposal exceeds the maxima set out in Appendix 1. However, the proposal provides broadly the same level of car parking as the existing Ashley Road depot. Transport officers accept that this level of car parking is necessary to maintain the efficiency of the service.</p> <p>Moreover, the increase in the number of LGVs, HGVs and small vehicle parking spaces, within the overall parking provision is supported, and assumed to be necessary to improve operations at the facility. The London Plan (FALP, 2015) Policy 6.13 (supporting paragraph 6.48) recognises that operational parking is essential under some developments, to allow the developments to function.</p> <p>On the basis that the proposal relocates an existing service and retains the existing ‘operational’ parking, and is considered to be broadly consistent with policy, transport officers support the parking provision. The layout of the car park is considered to be acceptable.</p> <p>London Plan Policy 6.13 provides that development should include electric vehicle (EV) charging points to encourage the uptake of electric vehicles. The policy requirement for EV charging points is 1 in 5 spaces (20%), with a minimum of 10% active and 10% passive.</p>	

Stakeholder	Question/Comment	Response
	<p>If this requirement were applied to the overall parking provision of 164 spaces, a minimum of 32 EV charging points (16 active and 16 passive) would be required. It is important to note that a large proportion (82 spaces) of the parking spaces is provided for HGVs and LGVs. These vehicles are not fuelled by electricity and it is therefore proposed that these spaces be exempt from this requirement. The remaining 82 parking spaces consist of small vehicle spaces and staff parking spaces – 26 and 56 parking spaces respectively. A provision of 16 EV charging points (8 active and 8 passive) would satisfy the London Plan requirements.</p> <p><u>Cycle Parking</u> The information in the Transport Statement provides that 24 cycle parking spaces will be provided. However, the General Site Layout Plan contains three (3) sheltered cycle parking area, providing an overall 24 short-stay and long-stay cycle parking spaces. The cycle parking provision exceeds the recommendations of the London Plan (FALP, 2015), which seeks a minimum overall provision of 15 cycle parking spaces (1 per 250sqm long-stay and 1 per 1,000sqm short-stay). The applicant will be required to increase the cycle parking provision should demand exceed the initial cycle parking provision. The level of cycle parking provision will be informed by the mode share for cycling observed in the annual travel surveys and the Travel Plan targets.</p> <p><u>Access Arrangements</u> Vehicle access is provided via two (2) crossovers to facilitate one-way traffic movement through the site. The proposal retains the existing vehicle access, which will serve as vehicle egress under the proposal. The north access is a new access.</p> <p>Vehicles will access the site via the north access and exit via the</p>	

Stakeholder	Question/Comment	Response
	<p>south (existing) access. The proposed traffic management arrangement is supported. This arrangement should minimise congestion in Marsh Lane, which might otherwise arise from vehicles waiting in Marsh Lane to give way to vehicles leaving the site.</p> <p>It should be noted that there is a proposal to widen the carriageway in Marsh Lane. The proposed highway scheme encompasses widening the carriageway to 7.0m and provision of dropped kerb. The proposed widening will minimise congestion and improve pedestrian access along Marsh Lane. The scheme is welcome by transport officers and is considered to be 'desirable' but not essential for the development to function.</p> <p>The proposed access and internal traffic management arrangements are also supported from the viewpoint of pedestrians and cyclists. Provision of a separate pedestrian access gate and segregated internal pedestrian paths will minimise pedestrian-vehicle conflicts within the site. Transport officers are satisfied with the steps taken by the applicant to create a safe pedestrian environment within the site.</p> <p>The new access must be constructed to the Council's standards, and any costs associated with the construction of the new vehicle access and modification of the existing access must be borne by the applicant.</p> <p>The provision of a new emergency vehicle access and egress in Watermead Way has been considered. This new vehicles access is provided for emergency use only in the event that Marsh Lane is blocked. The Design & Access Statement briefly mentions the access but the Transport Assessment does not include any details</p>	

Stakeholder	Question/Comment	Response
	<p>on it. There is no objection to the principle of introducing a vehicle access in Watermead Way, for emergency use only. However, the emergency vehicle access in Watermead Way is subject to approval of an acceptable design by the Council's Highway Engineer's, and the cost of constructing this access being met by the applicant (as part of the s.278 works/payment). The only concern regarding this is access is the potential for it to be used by vehicles outside of emergencies, and consequently impacting unduly on traffic in Watermead Way. The applicant will need to ensure that adequate management is put in place to ensure that this does not happen.</p> <p><u>Changes to Traffic Management Order</u></p> <p>There is a proposal to close the existing level crossing in Garman Road permanently. This proposal is likely to be implemented before the proposed depot becomes operational. The closure of this level crossing would mean that Marigold Road becomes the only access point for vehicles accessing the depots in Marsh Lane. This is likely to create an increase, albeit small, in the vehicles movement along Marigold Road.</p> <p>Transport officers note that the current parking bays along Marigold Road are a hindrance to traffic. The width of the carriageway between the parking bays on Marigold Road can accommodate only one (1) HGV at a time. Given an expected increase in HGV volume, it is recommended that the existing parking in Marigold Road be revised in order to ensure that two HGVs travelling in opposing directions can pass each other.</p> <p>The Council's Parking Services were consulted on the proposal and agreed with the principle of removing/modifying the existing parking in Marigold Road; subject to the prescribed procedure for amending</p>	

Stakeholder	Question/Comment	Response
	<p>the traffic management order and agreement by the applicant to pick up the cost of the TMO amendments.</p> <p><u>Trip Generation</u> The Transport Assessment includes a trip generation analysis which assesses the impact of the development on the adjoining road network. It should be noted that the development essentially consists of relocation of an existing service at Ashley Road. The TA includes data obtained from an ATC survey at the Ashley Road site to derive the trip generation data for the existing Ashley Road site, which is expected to be the same as the proposed site.</p> <p>The results of the ATC survey at the Ashley Road site shows an average inbound and outbound vehicle movement of 555 and 581 vehicles, respectively, over a 24 hour period. The highest observed inbound vehicle movements were during the hours of 05:00-06:00 and 13:00-14:00 with 60 and 58 vehicles respectively. The highest observed outbound vehicle movements during the hours of 06:00-07:00 and 13:00-14:00 with 72 and 57 vehicle movements respectively. This suggests that the development peaks will be outside of the peak traffic periods.</p> <p>The TA assessed the impacts of the development on the following adjoining junctions: Watermead Way/ Marigold Road Signal Junction and Marsh Lane/ Marigold Priority Junction. The junction capacity assessment was done using the following traffic modeling software: LinSig for the signal junction and PICADY for the priority junctions. The junctions were modeled with background traffic flows for the 2015 and 2020 scenarios; and the 2020 assessment (with development) scenario.</p> <p>The analyses of the junctions found that both junctions currently</p>	

Stakeholder	Question/Comment	Response
	<p>operate within capacity and that the operational capacity of the junction will not be adversely impacted by the development traffic. By comparison the analysis illustrates that the baseline 2015 practical reserve capacity for Watermead Way/ Marigold Road Signal Junction is 53% and 46% during the AM and PM peaks respectively. The practical reserve capacity under the 2020 assessment (with development) scenario finds that the reserve capacity for the junction will be 42% and 30% for the AM and PM peaks respectively. The results for Marsh Lane/ Marigold Junction demonstrate that this junction will not be seriously impacted by the development. This junction currently operates within capacity and will not be seriously affected by the development traffic.</p> <p>Based on the analyses of the adjoining junctions presented in the TA it can be concluded that the development will not adversely affect the operation of the adjoining road network.</p> <p><u>Travel Plan</u> The planning application is accompanied by a Framework Travel Plan (FTP), which outlines the aims and objectives of the travel plan and proposes targets and measures to achieve these aims and objectives. The FTP contains information on the local public transport, walking and cycle provisions, which will be used to formulate the Travel Plan (TP) targets and measures. It should be noted that the FTP does not present targets and measures specific to the site. These will be set out in the Travel Plan. The applicant is therefore required to develop a Full Travel Plan which must be submitted to the Council for its approval and be in place on operation of the development.</p> <p><u>Conclusions</u> In summary, the development is considered to be satisfactory in</p>	

Stakeholder	Question/Comment	Response
	<p>transport terms. The site has poor public transport accessibility rating because it is outside of the walking catchment of underground and rail stations. However, the site can be easily accessed by the bus routes operating in the vicinity. The level of parking is acceptable and complies with policy (London Plan 6.13; UDP Policy M10). The trip generation analysis found that the adjoining road network will not be severely impacted by the development. The access arrangements are supported and should minimise congestion in Marsh Lane. A revision to the current CPZ parking in Marigold Road is required, in order to minimise traffic congestion in Marigold Road. The proposed widening of the carriageway in Marsh Lane is supported but it is not necessitated by the development. The provisions for pedestrians and cyclists are acceptable. Transport officers support the development subject to the planning conditions.</p> <p><u>Planning Conditions/Obligations</u></p> <p>1. Construction Management Plan The owner is required to submit a Construction Management Plan (CMP) and Construction Logistics Plan (CLP) for the local authority's approval prior to construction work commencing on site. The Plans should provide details on how construction work (including any demolition) would be undertaken in a manner that disruption to traffic and pedestrians in the surrounding roads is minimised. It is also requested that construction vehicle movements should be carefully planned and co-ordinated to avoid the AM and PM peak periods.</p> <p>2. Highway Works The owner is required to pay for any essential highway works. The highway works might include, but is not limited to, alterations to the existing carriageway in Marsh Lane (in accordance with the LB</p>	

Stakeholder	Question/Comment	Response
	<p>Haringey proposed widening scheme for Marsh Lane), footway renewal or construction, access to the Highway, (including Watermead Way), amendments to the existing Traffic Management Orders (TMOs) in Marsh Lane and Marigold Road. Any essential highway works will be carried out by the Council at the applicant's expense once all the necessary internal site works have been completed. The applicant should telephone 020-8489 1300 to obtain a cost estimate and to arrange for the works to be carried out before the development is occupied. The highway works must be completed prior to occupation of the development. Unavoidable works required to be undertaken by Statutory Services will not be included in LBH Haringey Estimate or Payment.</p> <p>Reason: In the interests of maintaining highway safety and providing for the smooth flow of traffic, as well as minimising parking effects.</p> <p>3. Travel Plan The owner is required to submit a Workplace Travel Plan to be agreed by the Council's Transport officer towards achieving sustainable travel targets, including the services of a Travel Plan Coordinator. The Travel Plan must be produced prior to an in place on occupation of the development and must be monitored yearly for five (5) years. A contribution of £3,000 towards monitoring by the authority shall be paid by the owner prior to occupation.</p> <p>4. Cycle Parking The owner is required to provide cycle storage for the secure parking of 24 bicycles (or higher if the observed mode share for cycling and targets for cycling in the Travel Plan is greater) within the site, as shown on the plans hereby approved. The cycle parking hereby approved must be in place before the first occupation of the development.</p>	

Stakeholder	Question/Comment	Response
	<p>Reason: to ensure that a reasonable provision is made within the site for the parking of bicycles in the interest of relieving congestion in the surrounding streets and towards promoting sustainable travel.</p> <p>5. Electric Vehicle Charging Points</p> <p>Prior to the commencement of the relevant works, details of electric vehicle charging points shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented in full prior to the first occupation of the premises and retained thereafter in perpetuity.</p>	
<p>LBH Flood and Surface Water</p>	<p>I can confirm that in principal we are in support of the outline design proposals, volume and flow control and discharge rates as proposed in the drainage strategy for the site.</p> <p>It should be noted we will still require sight and agreement on some outstanding detail, namely but not inclusively, the intensive green roof, the orifice design, the reference to pumps and attenuation tanks, the final outfall points and invert levels and others as per the discussion as they become relevant.</p> <p>Conditions to cover the above should be worded along the lines of the following, including the usual LPA sustainable drainage conditions.</p> <p>1) No development shall take place until a detailed surface water drainage scheme for Site, which is based on sustainable drainage principles and an assessment of the hydrological and hydro-geological context of the development, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including the 1 in 100 year plus 30% for climate change critical storm will not exceed the run-off from the undeveloped site</p>	<p>Noted, condition attached.</p>

Stakeholder	Question/Comment	Response
	<p>following the corresponding rainfall event. The scheme shall include details of its maintenance and management after completion and shall subsequently be implemented in accordance with the approved details before the development on Site is occupied.</p> <p>Explanation: Mechanism for the detailed drainage proposals to be approved as the scheme is developed</p> <p>2) Completion and Maintenance of Sustainable Drainage – Shown on Approved Plans No building or use hereby permitted shall be occupied or the use commenced until the sustainable drainage scheme for this site has been completed in accordance with the submitted details. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan.</p> <p>Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal and maintained thereafter.</p>	
EH Pollution	<p>The proposed development is near a main road of air pollution concern, the High Road; a major route into London for which both monitoring and modelling indicates exceedences of the Government’s air quality objectives for nitrogen dioxide (NO2) and PM2.5.</p> <p>The London Plan, Policy 7.14 states that new development should:</p> <p>30. minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer</p>	Noted conditions and informative attached.

Stakeholder	Question/Comment	Response
	<p>zones or steps to promote greater use of sustainable transport modes through travel plans</p> <p>31. promote sustainable design and construction to reduce emissions from the demolition and construction of buildings;</p> <p>32. be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).</p> <p>33. Ensure that where provision needs to be made to reduce emission from a development, this is usually made on-site.</p> <p>It is noted that the Energy requirements are to be met with 2 x 67kW gas boilers.</p> <p>The following air quality focussed conditions are recommended;</p> <p>Combustion and Energy Plant:</p> <p>Prior to commencement of the development, details of the 2No. 67kW gas-fired boilers must be submitted to evidence that the units to be installed comply with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for developments in Band B.</p> <p>Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction.</p> <p><input type="checkbox"/> Management and Control of Dust:</p> <ul style="list-style-type: none"> • No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been 	

Stakeholder	Question/Comment	Response
	<p>submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment.</p> <p>Reason: To Comply with Policy 7.14 of the London Plan</p> <ul style="list-style-type: none"> • Prior to the commencement of any works the site or Contractor Company is to be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA. <p>Reason: To Comply with Policy 7.14 of the London Plan</p> <ul style="list-style-type: none"> • All plant and machinery to be used at demolition and construction phases is required to meet Stage IIIA 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 http://nrmm.london/ Proof of registration must be submitted prior to the commencement of any works on site. • 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>Reason: To comply with Policy 7.14 of the London Plan and the requirements of the Greater London NRMM LEZ.</p>	

Stakeholder	Question/Comment	Response
	<p><input type="checkbox"/> Electric vehicle Charging points:</p> <p>The application contains 3 parking spaces. Whilst the proposed development is car-free, in order to minimise the impact on air pollution, the 3 parking spaces should be fitted with electric vehicle charging points.</p> <p>Reason: To comply with Policy 7.14 of the London Plan and reduce air quality impacts.</p> <p><input type="checkbox"/> Contaminated land: (CON1 & CON2)</p> <ul style="list-style-type: none"> • CON1: <p>Before development commences other than for investigative work:</p> <p>a) A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority.</p> <p>b) If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. This shall be submitted to, and approved in writing by the</p>	

Stakeholder	Question/Comment	Response
	<p>Local Planning Authority prior to that investigation being carried out on site. The investigation must be comprehensive enough to enable:-</p> <p>a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.</p> <p>The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.</p> <p>c) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.</p> <ul style="list-style-type: none"> • And CON2 : <p>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>	

Stakeholder	Question/Comment	Response
	<p>As an informative:</p> <p>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.</p>	
Nature Conservation	<p>No objections, the site is of low ecological value, the proposal would provide an enhancement of biodiversity through the inclusion of a green roof, SUDS and other measures.</p> <p>The exterior light diagram is not clear, however with regard to bats there aren't any roosts on site to disturb and there is little habitat from which they are likely to forage. Therefore the key issues are likely to be centred around light spill onto any nearby habitat or commuting routes. Illumination should be kept to the absolute minimum necessary and avoid light spill beyond the site perimeter as much as is possible (the use of cowls should be considered if this might help achieve this). Lighting of the green roof and swale and between the roof and swale should be key points to consider along with proposed bird nesting boxes.</p>	Noted, lighting condition attached in accordance with comments.
Carbon Management	<p>1) Energy</p> <p>That the energy demand of this building is low. Therefore the required London Plan target can be delivered through the use of PV panels alone.</p> <p>It is proposed by the developer that a PV array generating 43,400 kWh per year is required to offset carbon emissions in order to achieve the London Plan target. By generating 43,400 kWh from a zero carbon technology an annual carbon saving of 22,500 kgCO₂ can be achieved. This PV array would cover approximately 300m².</p>	Noted conditions attached.

Stakeholder	Question/Comment	Response
	<p>Action: To condition that the development delivers the energy savings as set out in the document –“BREEAM ENE04: Low and Zero Carbon Technologies” by QODA (Aug 2015). Specifically this should include:</p> <ul style="list-style-type: none"> - An on-site electricity generation of 43,400 kWh through the use of approx 300m2 PV solar panels. <p>Any alteration of these energy savings must be submitted to the Planning Authority for approval.</p> <p>2) BREEAM The BREEAM Pre-Assessment for the new transport depot at Marsh Lane, Tottenham identifies that a 'Very Good' rating is achievable, with a score of 59.82%, based on current design information.</p> <p>Action: To condition that the development delivers the BREEAM Assessment with a “very good” outcome and a score or at least 59%. This should be submitted 6 months following completion. Failure to deliver this target will require that remedial measures are installed on-site to ensure that the target is delivered.</p>	
<p>Head of Emergency Planning and Business Continuity</p>	<p>The development should aim to minimise surface water run-off to other adjacent sites</p> <p>As the intended use constitutes critical local infrastructure (i.e. an essential local service), I would expect a flood risk management plan.</p> <p>This should aim to provide a reasonable level of flood resilience to the building and services, and reduce off-site contamination from any materials stored there affected by flood water.</p>	<p>Noted condition attached requiring a flood risk management plan.</p>
<p>Waste Management</p>	<p>Commercial Business must ensure all waste produced on site are</p>	<p>Noted</p>

Stakeholder	Question/Comment	Response
	<p>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. Arrangements must also be made to ensure cleansing of immediate areas around the location of the site.</p>	
EXTERNAL		
<p>The Environment Agency</p>	<p>19/10/2015</p> <p>We are pleased to advise that the FRA is sufficient to remove our objection 1. We recommend that finished floor levels for the proposed development are set as high as is practically possible, ideally 300mm above the 1 in 100 chance in any year including an allowance for climate change flood level, OR, where this is not practical, flood resilience / resistance measures are incorporated up to the 1 in 100 chance in any year including an allowance for climate change flood level. This is to protect the proposed development from flooding. Further information can be found in the document 'Improving the flood performance of new buildings' at: http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf. Additional guidance can be found in the Environment Agency Publication 'Prepare your property for flooding', which can be found on our website at http://www.environment-agency.gov.uk/homeandleisure/floods/31644.aspx.</p> <p>05/11/2015</p> <p>Thank you for your email dated 19 October 2015. The attachment was a quote for a Preliminary Risk Assessment, rather than a Preliminary Risk Assessment (PRA) itself. However there is enough</p>	<p>Noted and condition attached.</p>

Stakeholder	Question/Comment	Response
	<p>information to establish the previous uses of the site and sufficient summary of previous site investigations and we can therefore remove our previous objection. We consider that planning permission could be granted to the proposed development as submitted if the following planning condition is included as set out below. Without these conditions the proposed development on this site poses an unacceptable risk to the environment and we would object to the application.</p> <p>Condition 1 No development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), shall take place until a scheme that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:</p> <ol style="list-style-type: none"> 1) A preliminary risk assessment which has identified: <ul style="list-style-type: none"> • all previous uses • potential contaminants associated with those uses • a conceptual model of the site indicating sources, pathways and receptors • potentially unacceptable risks arising from contamination at the site. 2) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. 3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures 	

Stakeholder	Question/Comment	Response
	<p>required and how they are to be undertaken.</p> <p>4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.</p> <p>Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.</p> <p>Reason To protect controlled waters. The site is located in a Source Protection Zone 1 and on a secondary aquifer.</p> <p>National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).</p> <p>Condition 2 No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of</p>	

Stakeholder	Question/Comment	Response
	<p>sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.</p> <p>Reasons To protect groundwater. The verification report should be prepared with consideration of the EA guidance: https://www.gov.uk/government/publications/verification-of-remediation-of-land-contamination (Note to applicant: the verification report can also support the baseline quality for an Environmental Permit application site condition report).</p> <p>National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).</p> <p>Condition 3 No development should take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local Planning Authority, shall be submitted to and approved in writing by the Local</p>	

Stakeholder	Question/Comment	Response
	<p>Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that all long-term remediation works have been carried out and confirming that remedial targets have been achieved shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reasons To protect groundwater quality. Previous report described in the letter from ESG indicate free phase hydrocarbon contamination is present on the site. A minimum of 3 groundwater monitoring rounds are required to determine groundwater flow direction.</p> <p>National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).</p> <p>Condition 4 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 the developer has submitted a remediation</p>	

Stakeholder	Question/Comment	Response
	<p>strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.</p> <p>Reasons To protect groundwater. No site investigation fully characterises a site. Not all of the site area was accessible during the investigations to date.</p> <p>National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).</p> <p>Condition 5 No infiltration of surface water drainage into the ground at this site is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.</p> <p>Reasons To protect groundwater. Infiltrations SUDs/ soakaways that bypass the soil layers are unacceptable they create preferential pathways for contaminants to migrate and cause groundwater pollution.</p>	

Stakeholder	Question/Comment	Response
	<p>Condition 6 Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.</p> <p>Reasons To protect groundwater quality. Some piling techniques can cause remobilisation of contaminants and/or cause preferential pathways for contaminants to migrate & pollute groundwater.</p> <p><i>Advice to applicant</i> The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:</p> <ul style="list-style-type: none"> - Groundwater Protection: Principles and Practice (August 2013): https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3 - Technical Guidance Pages on our website, which include links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency’s Guiding Principles for Land Contamination) in the ‘overarching documents’ section: https://www.gov.uk/government/collections/land-contamination-technical-guidance - Planning Practice Guidance: http://planningguidance.planningportal.gov.uk/blog/guidance/land- 	

Stakeholder	Question/Comment	Response
	<p>affected-by-contamination/land-affected-by-contamination-guidance/</p> <ul style="list-style-type: none"> - British Standards when investigating potentially contaminated sites and groundwater (http://shop.bsigroup.com/Navigate-by/Standards/): <ul style="list-style-type: none"> ▪ BS 5930: 1999+A2:2010 Code of practice for site investigations ▪ BS 10175:2011 Code of practice for investigation of potentially contaminated sites ▪ BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points ▪ BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters - Use MCERTS accredited methods for testing contaminated soils at the site (https://www.gov.uk/government/collections/monitoring-emissions-to-air-land-and-water-mcerts) 	
Natural England	<p>Walthamstow Reservoirs Site of Special Scientific Interest This application is in close proximity to Walthamstow Reservoir Site of Special Scientific Interest (SSSI). Natural England is satisfied that the proposed development being carried out in strict accordance with the details of the application, as submitted, will not damage or destroy the interest features for which the site has been notified. We therefore advise your authority that this SSSI does not represent a constraint in determining this application. Should the details of this application change, Natural England draws your attention to Section 28(l) of the Wildlife and Countryside Act 1981 (as amended), requiring your authority to re-consult Natural England.</p> <p>Other advice We would expect the Local Planning Authority (LPA) to assess and</p>	Noted.

Stakeholder	Question/Comment	Response
	<p>consider the other possible impacts resulting from this proposal on the following when determining this application:</p> <ul style="list-style-type: none"> • local sites (biodiversity and geodiversity) • local landscape character • local or national biodiversity priority habitats and species. <p>Natural England does not hold locally specific information relating to the above. These remain material considerations in the determination of this planning application and we recommend that you seek further information from the appropriate bodies (which may include the local records centre, your local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document) in order to ensure the LPA has sufficient information to fully understand the impact of the proposal before it determines the application. A more comprehensive list of local groups can be found at Wildlife and Countryside link.</p> <p>Protected Species We have not assessed this application and associated documents for impacts on protected species.</p> <p>Natural England has published Standing Advice on protected species.</p> <p>You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.</p> <p>The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected</p>	

Stakeholder	Question/Comment	Response
	<p>Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.</p> <p>If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at consultations@naturalengland.org.uk.</p> <p>Biodiversity enhancements This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the installation of bird nest boxes.</p> <ul style="list-style-type: none"> • Landscaping to provide replacement for scrub should be incorporated. • Appropriate green and brown roofs design; consider combined biodiverse roof with solar where PV proposed. <p>The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the NPPF. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.</p>	

Stakeholder	Question/Comment	Response
London Wildlife Trust	No comments	Noted.
London Fire Brigade	<p>The Brigade is satisfied with the proposals.</p> <p>This Authority 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.</p>	Noted, informative attached.
Lee Valley Regional Park Authority	<p>The frontage of this site falls entirely within the statutory boundary of the Regional Park. The design of the proposed depot largely follows the outcome of pre application discussions held earlier this year with officers from the Authority resulting in the creation of a landscaped swale along the entire frontage although the depth of this just falls short of the full extent of the Regional Park boundary. In principle the design of the layout is acceptable.</p> <p>The inclusion of the path along the southern boundary into the application site is to be welcome as its physical improvement and lighting will afford improved access to the Regional Park by Tottenham's communities.</p>	Noted
The Greater London Archaeological Advisory Service	<p>Having considered the proposal with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets or archaeological interest.</p> <p>No further assessment or conditions are therefore necessary.</p>	Noted
Thames Water	With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is	Informatives attached.

Stakeholder	Question/Comment	Response
	<p>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 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.</p> <p>There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the options available at this site.</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. Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.</p> <p>Water Comments</p>	

Stakeholder	Question/Comment	Response
	<p>Thames Water recommend the following informative be attached to any planning permission: There is a Thames Water main crossing the development site which may/will need to be diverted at the Developer's cost, or necessitate amendments to the proposed development design so that the aforementioned main can be retained. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.</p> <p>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. On the basis of information provided, Thames Water would advise that with regard to water infrastructure capacity, we would not have any objection to the above planning application.</p>	
<p>London Underground Infrastructure Protection</p>	<p>No objection in principle to the above planning application there are a number of potential constraints on the redevelopment of a site situated close to railway infrastructure. Therefore, it will need to be demonstrated to the satisfaction of LUL engineers that:</p> <ul style="list-style-type: none"> • our right of support is not compromised • the development will not have any detrimental effect on our structures either in the short or long term • the design must be such that the loading imposed on our structures is not increased or removed • we offer no right of support to the development or land <p>Therefore we request that the grant of planning permission be subject to conditions to secure the following:</p>	<p>Noted, conditions attached.</p>

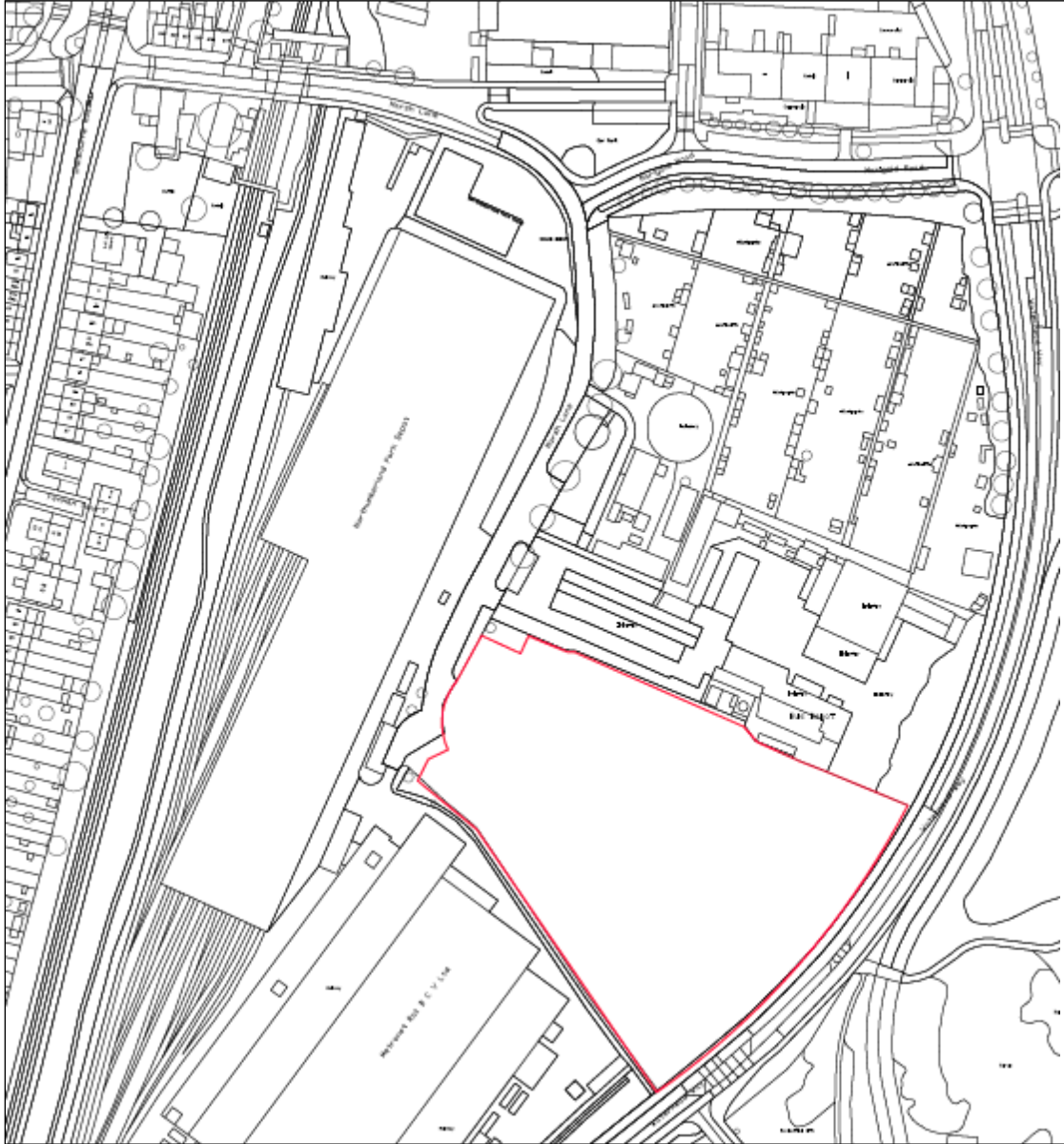
Stakeholder	Question/Comment	Response
	<p>The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:</p> <ul style="list-style-type: none"> • provide details on all structures • accommodate the location of the existing London Underground structures • there should be no opening windows facing the LU elevation□ • demonstrate access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering our land • demonstrate that there will at no time be any potential security risk to our railway, property or structures • accommodate ground movement arising from the construction there of mitigate the effects of noise and vibration arising from the adjoining operations within the structures <p>The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.</p> <p>Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2011 Table 6.1 and 'Land for</p>	

Stakeholder	Question/Comment	Response
	<p>Industry and Transport' Supplementary Planning Guidance 2012</p> <p>We also ask that the following informative is added: The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; construction methods; security; boundary treatment; safety barriers; landscaping and lighting</p>	
TfL	<p>TfL planning would like to emphasise the conditions set out by TfL London Underground colleagues.</p> <ul style="list-style-type: none"> • A detailed Construction Logistics Plan should be provided and assessed prior to any demolition or construction works commencing. • A framework Travel Plan has been submitted in conjunction with this application. TfL has assessed the FTP through ATTrBuTE and has deemed the FTP to fail. <p>Areas which the FTP can improve are; setting out time-framed targets; outlining the policy which has dictated the TP objectives; and outline the funding streams for the TP. The final TP should be secured and implemented by s106.</p>	Noted a travel plan has been conditioned.
Network Rail	After reviewing the information provided in relation to the above planning application, Network Rail has no objection or further observations to make.	Noted.
Metropolitan Police Designing Out Crime Officer	<p>No objections to the proposals.</p> <p>I have already been consulted on this scheme by the LBH Development team and given my advice which appears to have been incorporated into the designs. I can give further security advice throughout the lifetime of the project as appropriate</p>	Noted.
North London Waste Authority	No comments	Noted.

Stakeholder	Question/Comment	Response
NEIGHBOURING PROPERTIES	<ul style="list-style-type: none"> • It is not clear if this proposal would provide a recycling centre to replace the Park View Road facility. If it is, the design should provide level access for members of the public • Welcome the proposal for a green roof, wildflower rich swale and solar PV, these should be made mandatory via conditions • One cycle space per 10 staff is low • The bat population of Tottenham Marsh is suppressed by existing lighting, light sources should be minimised through LEDs and shielding to avoid spillage • Only 50% of vehicles should be diesel by 2018 	<p>The proposal does not replace the Park View Road recycling facility which will be re-provided elsewhere.</p> <p>These measures will be conditioned The cycle parking provision (24 spaces) exceeds the recommendations of the London Plan (15 spaces) A condition has been attached to minimise light spillage.</p> <p>Provision has been made for electrical vehicles in accordance with the London Plan.</p>

Appendix 2 Plans and Images

Location Plan



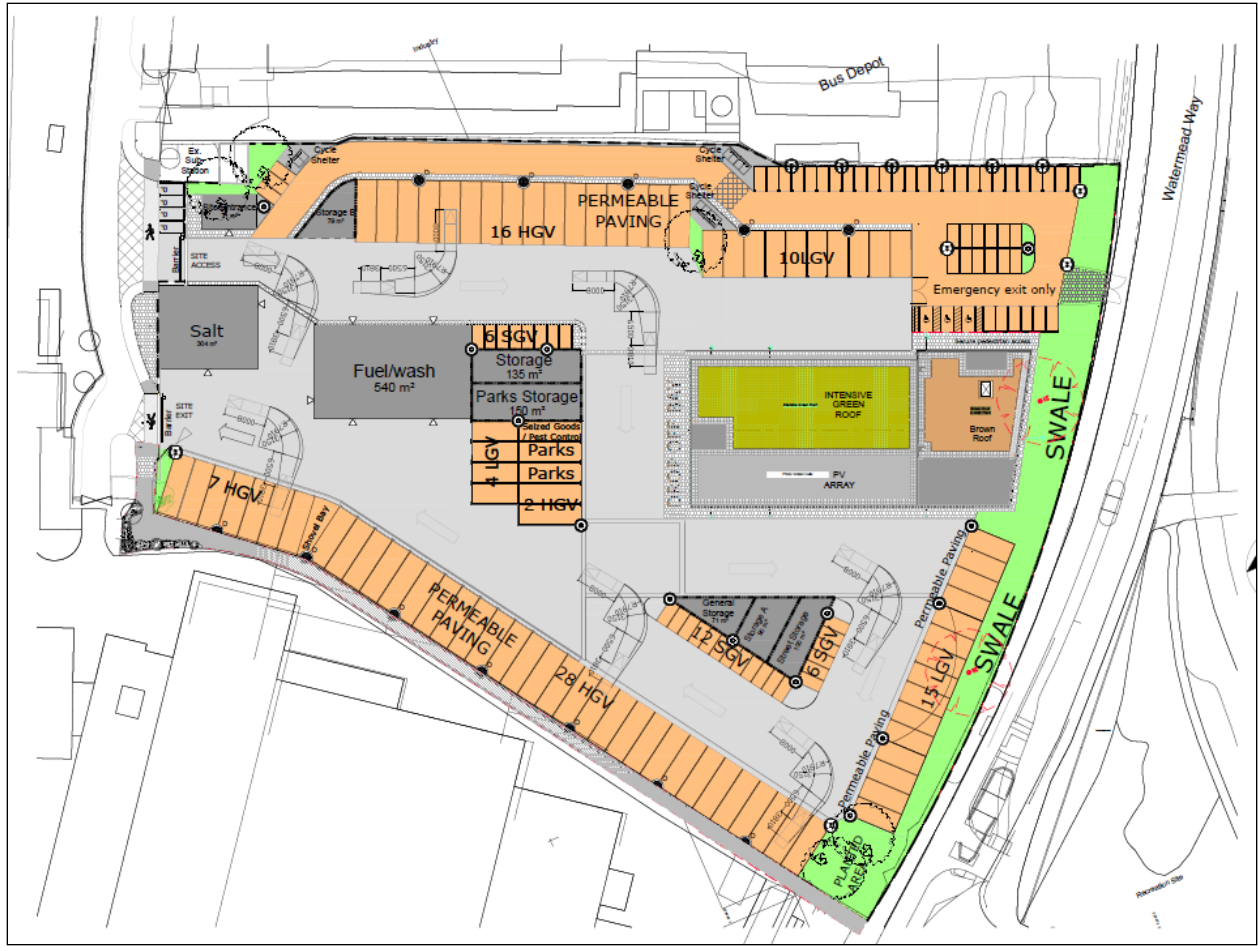
Existing site







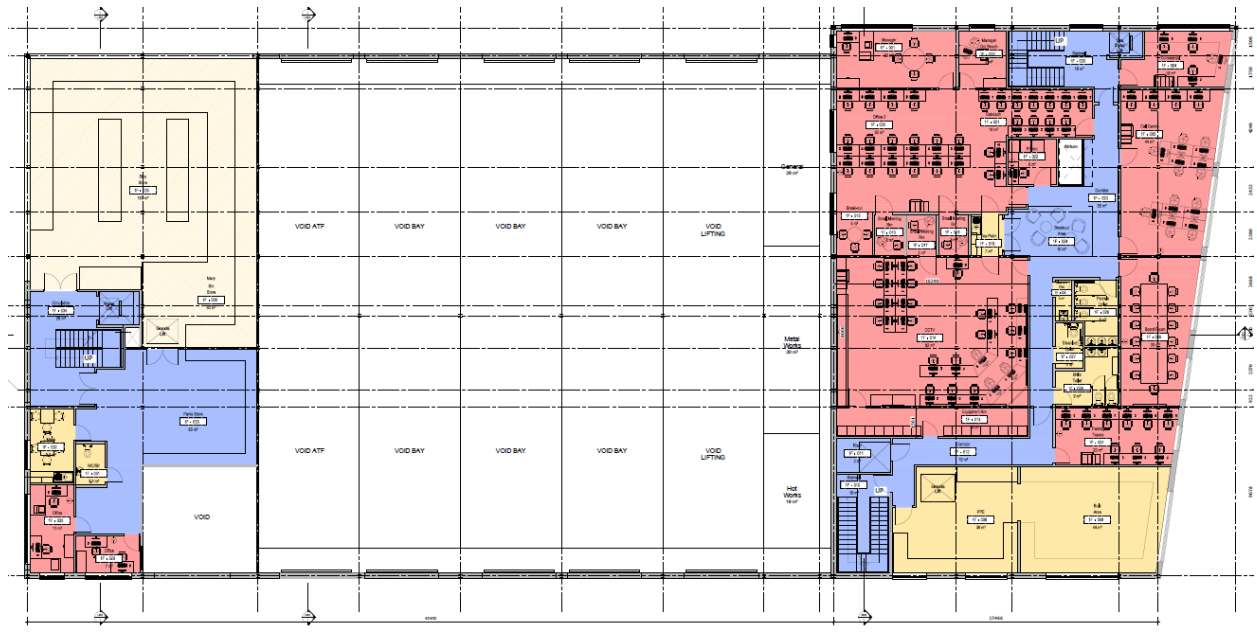
Proposed site Layout



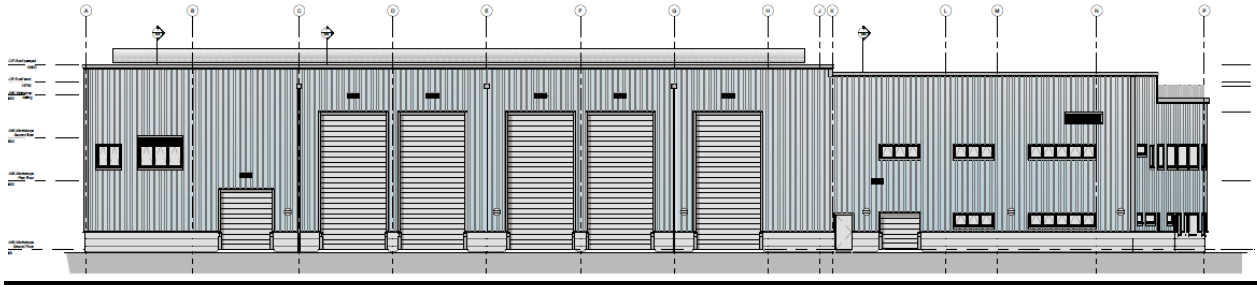
Ground floor plan



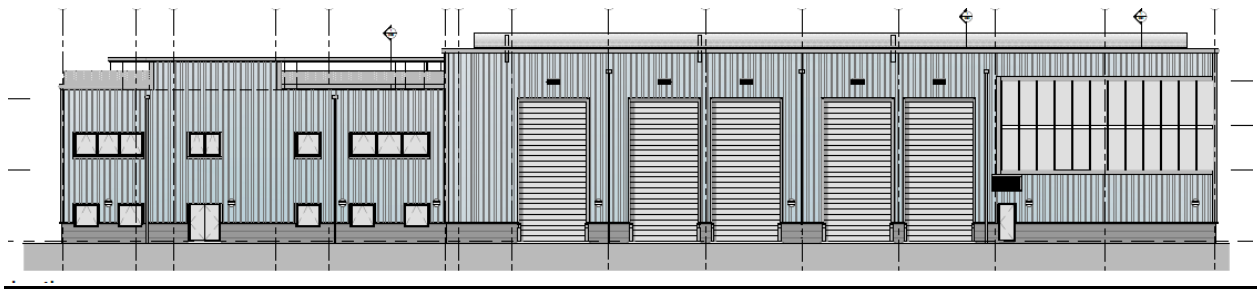
First floor plan



South elevation



North elevation



East elevation

West elevation



Aerial view south east



Aerial view looking north west

