

From: Planning Support
Subject: FW: Re: Discharge of Condition Planning Application HGY/2023/0042 at (SDP) Sites, Welbourne, North Island, Ferry Island, Ashley Road East and Ashley Road West, Station Road, London, N17.

Sent: 15 March 2023 13:16

Subject: Re: Discharge of Condition Planning Application HGY/2023/0042 at (SDP) Sites, Welbourne, North Island, Ferry Island, Ashley Road East and Ashley Road West, Station Road, London, N17.

Dear Martin

Re: Discharge of Condition Planning Application HGY/2022/4218 at (SDP) Sites, Welbourne, North Island, Ferry Island, Ashley Road East and Ashley Road West, Station Road, London, N17.

Thanks for contacting the Carbon Management Team (Pollution) regarding the discharge of condition 16 (Back-up Diesel Generators - Details of EU Stage V Emission Standards Compliance - LBH Environmental Health) in relation to Plot A (North Island site) of the Tottenham Hale Centre planning permission HGY/2018/2223 dated 27 March 2019 and I will like to comment as follows.

Having consider the applicant submitted generator supportive information comprising Tottenham Hale Island Site – Condition E16 condition discharge prepared by EDC and the Technical Submission with reference Tecs Sub no: TH-IS-03-001-X-012922-60-923 REV: P01 dated 15th March, 2022, **please be advised that, we are not satisfied with the discharge of the attached condition 16 (Back-up Diesel Generators - Details of EU Stage V Emission Standards Compliance - LBH Environmental Health) in relation to Plot A (North Island site) of the Tottenham Hale Centre planning application HGY/2018/2223 for the following reasons.**

- a. As advised in the previous application site refusal, the condition can only be discharge once the other relevant information as regards its fuel specification, flues height and it's hours of operation has been submitted or where the applicant submission mirror the recommended condition by this team below which is completely opposite to the applicant submission in the EDC document which said there is no restriction to the number of hours a backup generator can operate for but that (operators must try to reduce the period and frequency of emergency use 'black start' backup generators can operate for). **That aside, the pollution department never agreed to the discharge of the condition for Plot D and E as submitted in our recommendation at the time.**
- b. Secondly, generator will need to meet the Stage V emission limits of its engine category which seems not to be the case as we will need more information more than the current applicant submission that the low run time (of which the applicant has been silent on the specific hours) brings it under the requirement of the EU Stage V emission standards.
- c. Therefore, applicant will need to provide evidence of the compliance whilst;
- d. We also need to see how the generators shall be operated with a minimal noise impacts.

Here is the full condition recommend by the pollution team.

Full condition 16 (Back-up Diesel Generators - Details of EU Stage V Emission Standards Compliance - LBH Environmental Health)

- Generators shall be used solely on brief intermittent and exceptional occasions when required in response to an emergency and for the testing as necessary to meet that purpose and shall not be used at any other time. At all times the generators shall be operated to minimise noise impacts and emissions of air pollutants and a log of operational hours shall be maintained and be available for inspection by the Local Planning Authority.
- The emergency back-up diesel generators installed for use on the site shall comply with the EU Stage V Emission Standards for Generator Set Engines. Evidence of compliance shall be provided to the LPA for approval prior to installation.

- The diesel generators shall run on ultra-low sulphur diesel (ULSD) meeting the fuel specification within EN590:2004.
- Unless otherwise agreed in writing by the Local planning authority all combustion flues must terminate at least 1 m above the highest roof in the development in order to ensure maximum dispersion of pollutants.

Whilst we understand some of the criteria mentioned in (a) above has been condition in other planning conditions recommend for the site, this team recommend a single unified condition in the first place in order to circumvent any problem this will create if not done in tandem.

I hope the above clarify our position on the submitted application? Otherwise, feel free to contact us should you have any other query quoting M3 reference number WK/561949.

Yours sincerely

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