

Haringey Council London Borough  
Planning, Regeneration & Economy,  
Level 6, River Park House,  
225 High Road,  
Wood Green,  
N22 8HQ

16 May 2023

Dear Sir/ Madam,

**FULL PLANNING APPLICATION FOR RENTAL VEHICLE PREMISES AND STORAGE SITE (SUI GENERIS / B8) INCLUDING DEMOLITION OF EXISTING STRUCTURES, INSTALLATION OF RENTAL VEHICLE OFFICE AND RENTAL VEHICLE WASH BAY, RENTAL VEHICLE STORAGE, CAR PARKING AND ASSOCIATED WORKS; AND ADVERTISEMENT CONSENT FOR DISPLAY OF ADVERTISEMENTS ASSOCIATED WITH THE PROPOSED USE  
LAND AND RAILWAY ARCHES TO THE SOUTH OF PAGE GREEN ROAD, LONDON, N15 4PG  
APPLICATION ON BEHALF OF ENTERPRISE RENT-A-CAR UK LTD**

Please find enclosed an application for full planning permission for the change of use of the above site for use as a rental vehicle premises and storage site (Sui Generis / B8), comprising demolition of existing structures, re-use of railway arches as an office to administer the rental vehicles, installation of rental vehicle wash bay to prepare rental vehicles for use, rental vehicle storage, car parking and associated works.

In addition, advertisement consent is sought for signage associated with the proposed use.

The application has been submitted through the Planning Portal (under reference **PP-12116367**), on behalf of Enterprise Rent-A-Car-UK Ltd (henceforth referred to as 'Enterprise' within this statement).

The application includes the following:

- Completed Application Forms;
- Application fee of £594.00<sup>1</sup> for full planning permission and advertisement consent (based on 78 sq.m of floorspace being proposed) – paid directly through Planning Portal;
- Completed CIL Questions Form;

Application Plans:

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<sup>1</sup> Plus £32.20 Planning Portal Service Charge

- Site Location Plan (ref U1XX01);
- Existing Site Layout Plan showing proposed demolition and existing area under railway arches to be converted (Ref. U1XX02);
- Proposed Site Layout Plan (Ref. U1XX03);
- Proposed Office and Welfare Arch Floor Plans (Ref. U1XX04);
- Proposed Office and Welfare Arch Elevations (Ref. U1XX05);
- Proposed Wash Bay Elevations (Ref. U1XX07);
- Wash Bay Silt Trap Specification (Ref. 800341-06);
- Signage Design and Specification Pack (Ref. U1XX06); and
- Demolition Method Statement (Ref. U1XX08).

#### Supporting Documents:

- Transport Statement (prepared by PJA);
- Noise Assessment (prepared by Syntegra);
- Preliminary Ecological Appraisal (prepared by Ecologylink); and
- This Extended Covering Letter – which comprises a Planning Statement and also considers matters around archaeology as well as economic development, design and amenity and flood risk.

#### **Site Description**

The application site ('the Site') comprises a generally triangular area of land amounting to around 0.5ha, comprising predominantly of hardstanding but with railway arches sitting centrally within the site underneath an active railway line that runs through the middle of the site southwest to northeast. The site is located to the south of Page Green Road and is accessed direct from Page Green Road opposite its junction with Stamford Road which goes off to the north. The southern boundary of the Site is formed by another active railway line.

The predominant land use in the surrounding area is commercial and industrial but immediately to the west of the site is a row of terraced houses. To the northwest, on the western side of Stamford Road, there is another row of terraced houses. However, to the northeast, on the eastern side of Stamford Road, and to the east of the Site generally, the predominant use is commercial and industrial including the Hale Business Centre to the north and various vehicle repair businesses immediately to the east of the site accessed from Markfield Road. To the south of the site is an active railway line with Markfield Park to the south of that. To the southwest is Gladesmore Community School and Crowland Primary School within a predominantly residential area.

#### **Relevant Planning History**

There is no recent (or relevant) planning history specifically for the Site available on the Council's Public Access system.

It is understood that the Site has most recently been used partly as a scaffolding business and partly to repair motor vehicles.

#### **The Applicant**

This application is being submitted on behalf of Enterprise Rent-A-Car UK Ltd, a global vehicle rental company. Enterprise is one of the largest transportation solution providers in the world offering

customers local and airport car rentals, car sharing, exotic car hire and van hire, along with a Flex-E-Rent service, providing business solutions for specialised vehicle needs, for example, temperature-controlled vans and accessible minibuses for example. The company operates in more than 9,500 locations across nearly 100 countries.

Enterprise also has the largest Car Club network in the UK providing its members with 24/7 access to its cars and vans without the need to own their own. It has been estimated that car clubs produce 72% lower emissions than the average UK car and each of Enterprise's Car Club vehicles takes around 20 private cars off the road.

The proposed development will support the sustainable expansion of Enterprise's business and provide a sustainable transport solution for local residents and workers as an alternative to private car ownership.

Enterprise employs nearly 80,000 people in nearly 100 countries, with training and development of its employees, and 'promoting from within', at the core of its culture. As such Enterprise have won numerous employment awards and are a Times Top 100 Graduate Employer (2022), a Times Top 50 Employer for Women (2022), a Stonewall Top 100 LGBTQ+ Inclusive Employer (2023) and a Top 75 Social Mobility Employer (2022) – to name but a few.

### **Development Proposals**

This application proposes a new rental vehicle premises for Enterprise. The proposals comprise a new office building (c. 61.5 sq.m) which will be located within one of the railway arches on the Site and to be used by Enterprise to administer their rental vehicles. Enterprise will also use one of the arches as a welfare facility for its staff (c. 16.5 sq.m). They will also install a purpose-built rental vehicle wash bay which will be used to clean, valet and generally prepare their rental vehicles for use by customers. The wash bay will also be used by Enterprise for minor maintenance of its rental vehicles, such as to undertake 'smart repair' for example. Externally, existing structures will be demolished to facilitate use of the Site predominantly to store rental vehicles ahead of their use by (or distribution to) customers. There will be limited parking available on the Site for staff, and a disabled access parking space is located as close to the rental vehicle office as possible. The site will be resurfaced as necessary to facilitate Enterprise's required operations.

Enterprise's required hours of operation are: Monday to Friday 8am to 6pm, Saturday 9am to 5pm and Sundays and Bank Holidays 10am to 5pm.

### ***Employment Generation and Investment***

Enterprise's proposals here represent significant investment by the company at this otherwise underutilised previously developed site. To put their investment into context, a new branch typically requires investment of between £500,000 and £750,000 initially to deliver the site ready for occupation, on top of investment in supporting supply chains and service providers and continued investment arising from continued and improved operational use at the site. The site will also generate investment in the local area generally by Enterprise's employees and customers for example, throughout Enterprise's occupation and operational lifespan.

Enterprise's proposed use as a vehicle rental premises, although Sui Generis as a result of its wider practices not falling within a single use class and therefore forming 'a class of its own', comprises of operations that of themselves would fall within a range of B (and former B) use classes. For example, rental vehicle storage and distribution which will be the predominant use of this Site, falls within use class B8 and this use class is applied for here also in this instance where the Site is larger than

Enterprise's typical locations and provides the opportunity to store more rental vehicles within a dedicated area to the east of the Site. The wash bay functions would also fall within former use class B1c (now E.g.iii.), and the ancillary office use would of itself fall in former B1a use (now (E.g.i.)).

Importantly, Enterprise's use here is an employment generating Sui Generis use, and will employ around 8 people initially, with 6 'management' and 2 valet/drivers anticipated here initially. Additional jobs will be created, and sustained, in supporting services and industries also.

#### *Parking / Vehicle Storage*

The proposal seeks to retain and utilise the existing access into the Site directly from Page Green Road as shown on the accompanying plans.

The application site will have around 100 dedicated parking spaces, which includes larger spaces for plus-sized cars and vans and a DDA compliant bay located as close to the entrance of the rental office as possible. Provision will also be made for Electric Vehicle charging albeit this will be for rental vehicles (and Car Club vehicles) only as demand for this type of rental vehicles requires.

For this site to operate effectively Enterprise would expect that around 90% of its rental vehicles available from this site will be in use, and away from site, at any one time.

It should be emphasised that the significant majority of "car parking" will be used by Enterprise to store its rental vehicles, rather than for vehicle parking in its traditional sense. That said, some provision will be available for staff should it be needed. However, and as set out in detail below, in most cases Enterprise's staff will arrive and leave the Site in an Enterprise rental vehicle as part of their 'fluid fleet' moving rental vehicles between branches, or by other sustainable means of transport such as by bus, train, bicycle or walking. Enterprise's customers will also be encouraged to walk, cycle or to utilise public transport to access the site if not taking up Enterprise's pick-up and drop-off service, and there is no customer parking as a result.

Enterprise's proposed use of the Site will also include provision, likely to be two vehicles initially, for its Car Club vehicles. Enterprise's Car Club provides members with 24/7 access to a choice of new cars and vans parked locally to where they live, work and study without the need to own, and run, a vehicle of their own.

Enterprise requires the storage site to be secure, particularly out of opening hours. This means that fences and gates will be required around the site boundary, as they are now, with existing provision retained where possible. Droppable bollards will also be used to control access into and within the wider Site and the storage area in particular, to facilitate Network Rail's required access to the south west of the Site. The boundary treatments have been proposed to allow views into the site to emphasise the site's active use and animation of space within as far as possible, albeit noting that the Site has limited visible frontage from Page Green Road where the majority of this frontage is well screened by established street trees that sit outside of the Site boundary and will be entirely unaffected by the proposals. For the avoidance of doubt, any trees within the site will also be unaffected by the proposed development.

The Site will remain open during operational hours but the proposed Car Club vehicles require 24/7 access such that these are placed outside of bollards, fences and gates that secure the storage site, so that people requiring access to those Car Club vehicles out of the wider site's opening hours do not need access into the wider site which will remain closed outside of operational hours.

In terms of customer and/or staff parking requirements, Enterprise offer a Pick-Up/Drop-Off service to every customer. In addition, Enterprise does not permit customers to park on site (this is reflective of the fact that in most instances its customers are using Enterprise to rent a vehicle because they do not have alternative means of access to a vehicle). Similarly, in the majority of instances, Enterprise's employees will not need to park their own vehicles at branch, as they routinely move Enterprise's rental vehicles between branches at the beginning and end of each working day – and use those vehicles to travel to and from work.

That said, the site is in a highly sustainable location with ample amenities within short walk or cycle distance and several bus stops and three railway stations offering frequent services to destinations across London are accessible within a five to 12 minute walk from the site.

When not accessing the Site in operational rental vehicles staff will be encouraged to use public transport, walk or cycle. The location generally and sustainable accessibility of the Site is set out in detail in the submitted Transport Statement prepared by PJA.

### *Signage*

Enterprise also requires advertisement consent for signage proposed in association with their proposed use of the Site.

The proposals require the display of signage relating to Enterprise's proposed use. The signage proposed includes a totem sign which will be fitted in the northern part of the site, to make customers aware of Enterprise's use at the site. The proposed signage also includes a fascia sign above the proposed rental vehicle office and a directional sign directing customers through the relevant railway arch into the vehicle return area.

Other directional signs, including moveable signs, are proposed to direct customers around the site to the relevant areas such as to the car return area for example.

### **Planning Policy**

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires all planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

### **The Development Plan**

Haringey's Development Plan (relevant to the Site) is currently made up of the Strategic Policies (2017), Development Management Policies (2017), Site Allocations (2017) and Tottenham Area Action Plan (2017), alongside the London Plan (2021).

The northern part of the Site is identified as a minor part of a wider Locally Significant Industrial Site (LSIS) on the Development Plan Proposals Map. This covers the area to the north of the northern railway line dissecting the Site around the entrance to the Site and to the rear of the homes on Page Green Road (see below):



The Site also falls within part of an Ecological Corridor which is formed between the two active railway lines (see below), and is within a wider area identified as an Area of Archaeological Importance.

In this Policy context, the following policies are considered of principal relevance to Enterprise's proposals at the Site:

#### **Local Plan: Strategic Policies 2013 (updated 2017)**

The purpose of the document is to set out the long-term vision of how Haringey should develop by 2026 and sets out the council's strategy for achieving that vision including high-level strategic policies used in determining planning applications.

#### ***SP8: Employment***

The Council will safeguard the listed Locally Significant Industrial Sites (LSIS) for a range of industrial uses (B1b, B1c, B2 and B8) where they continue to meet demand and the needs of modern industry and business.

The Policy's supporting text (at paragraph 5.1.12) sets out that the LSIS are well established industrial areas and the aim of the Policy is to retain them solely for uses that fall within B1b, B1C, B2 or B8 of the Use Classes Order, or uses that share strong similarities to this use class (our emphasis underlined).

The Site does not readily fall within any of the sites listed in Policy SP8 but the Policies Map includes the small triangle of the site to the north of the northern railway line as a LSIS. With this in mind, the majority of Enterprise's use at the Site is for open rental vehicle storage which falls within Use Class B8. In any event, Enterprise's wider use is an employment generating Sui Generis use that has strong similarities to the B (and former B) use classes that the Policy is looking to retain and if split into its constituent parts each of Enterprise's key operations would fall within those use classes also. In other words Enterprise's proposed use at this site either falls within a B use class or forms a use that shares strong similarities to B use classes.

#### ***SP7: Transport***

Under 'Delivering Action on Climate Change and Quality and Healthy Places' Policy SP7 sets out that the Council will work with its partners to promote the following travel demand management schemes including (inter alia) "promoting car sharing and establishing car clubs" and "supporting measures to influence behavioural change such as promoting low carbon vehicles".

As set out in more detail below, Enterprise's proposed use in actively providing shared vehicles and Car Club vehicles for use by local residents and workers, and low and ultra-low emission vehicles also, is delivering a variety of 'sustainable transport modes' as defined in the NPPF and that meet Policy SP7's aims head-on. The submitted Transport Statement also sets out how the proposed rental (shared) and Car Club vehicles have the potential to reduce wider vehicle ownership and use and promote a modal shift away from private vehicle ownership.

#### **Local Plan: Development Management DPD (2017)**

The Development Management DPD sets out planning policies to help determine which developments are granted planning permission in Haringey and to deliver against the strategic policies identified in the Strategic Policies document.

#### ***Policy DM37: Maximising the Use of Employment Land and Floorspace***

Part B. of Policy 37 deals with Locally Significant Industrial Sites (LSIS), and sets out that proposals for uses not within [former] Use Classes B1 to B8 will only be supported in exceptional circumstances where the following can be demonstrated:

- a. The proposal is necessary to facilitate meeting the needs of modern industry and business; or
- b. The proposal relates to a use which supports the continued functioning of the LSIS as a predominantly industrial and commercial area; or
- c. The proposal would deliver strategic economic benefits of a borough or sub-regional scale; and
- d. The loss of the B Use Class land or floorspace would not compromise the strategic employment land requirement; and
- e. The proposal would not restrict, prevent or in any way prejudice the continued operation of adjoining or nearby established employment uses.

Enterprise's proposed use of the Site predominantly comprises open vehicle storage (Use Class B8). Enterprise's wider Sui Generis use is also an employment generating Sui Generis use that as a result of including more than one single function that could, of themselves, each fall within a B (or former B) use class means that its use is Sui Generis (or 'of itself'). However, Enterprise's use is a commercial one and Enterprise is an employment generating business with training and development of its employees, and 'promoting from within', at the core of its culture.

Enterprise's use here will also support the wider function of the LSIS by providing a sustainable transport mode for the benefit of people working in the wider LSIS and will not in any way prejudice the continued operation of the adjoining or nearby established employment uses. In fact, given residential uses bound this particular Site (to its west and northwest), Enterprise's use represents a particularly good fit here acting as a compatible and intervening employment generating use between the more industrial employment uses to the east and northeast of the Site and the residential uses to the west.

#### ***Policy DM32: Parking***

As a general point, Policy DM32 sets out that development proposals will be assessed against the car parking and cycle parking standards set out in the London Plan. More specific to Enterprise's proposals, Part B of the Policy sets out that *'the Council will strongly encourage contributions to car club schemes or the provision of car club bays as an alternative to on-site car parking'*.

As set out in more detail below, the proposal includes provision of Enterprise's Car Club specifically. However, Enterprise's proposals also include shared rental vehicles that its customers can hire for the hour, day or longer which together actively promote a modal shift away from private vehicle ownership and deliver a sustainable transport mode of themselves also. Enterprise provide no parking for customers but instead offer a pick-up and drop-off service.

#### ***Policy DM19: Nature Conservation***

Part A of the Policy sets out that development proposals on sites which are, or are adjacent to, internationally designated sites, Sites of Special Scientific Interest, Local Nature Reserves, Sites of Importance for Nature Conservation or Ecological Corridors, should protect and enhance the nature conservation value of the site.

Part B sets out that development that has a direct or indirect adverse impact upon important ecological assets, either individually or in combination with other development, will only be permitted where:

- a. The harm cannot be reasonably avoided; and
- b. It has been suitably demonstrated that appropriate mitigation can address the harm caused

In this case, the Site falls within a wider Ecological Corridor as identified through the Proposals Map. With this in mind, a Preliminary Ecological Appraisal has been submitted with the application and its conclusions summarised below. That said, the proposed development will utilise a previously developed site and seeks to protect, and enhance where possible, any nature conservation value at the site noting the following habitat areas were identified.

**Table 1.1 Site habitat areas (m<sup>2</sup>).**

| Habitats               | Area m <sup>2</sup> |
|------------------------|---------------------|
| Building (footprint)   | 161                 |
| Hard Surface           | 3540                |
| Ruderal                | 418                 |
| Scrub                  | 149                 |
| <b>Total Site Area</b> | <b>4968</b>         |

#### ***Policy DM9: Management of the Historic Environment (inter alia)***

The site is located within an Archaeological Priority Area as identified through the Proposals Map. Part H of the Policy sets out that proposals affecting a designated Archaeological Priority Area will be considered having regard to:

- a. The significance of an archaeological asset and its setting; and
- b. The impact of the proposal on archaeological assets; and
- c. The priority given to preserving and managing the archaeological asset and its setting in situ.

Part I of the Policy sets out that all proposals will be required to assess the potential impact on archaeological assets and where appropriate ensure adequate arrangements for the investigation, recording and archiving of assets of archaeological importance and engage with the relevant advisory organisations.

Supporting paragraph 2.75 sets out that locations within Haringey which are suspected to contain below ground archaeology are identified on the Policies Map as Archaeological Priority Areas.

Applicants should refer these areas when considering site development opportunities and assess whether sites are known or likely to contain archaeological remains. The Council will require the submission of an archaeological evaluation report if it considers there are assets of importance on site (our emphasis underlined).

Where archaeological remains are found, the Council will seek to ensure that the remains and their settings are permanently preserved and managed in situ. If it is suitably demonstrated that this is not possible, a programme of conservation will be required including satisfactory excavation and recording of remains on site along with arrangements for archiving, including publication and deposition in an appropriate designated museum. Where remains can be preserved in situ, developments should seek opportunities to provide for public display and interpretation.

In this instance, Enterprise's proposals are for the re-use of a previously developed site comprising entirely of hardstanding. Their proposals will include re-surfacing the existing surface where necessary but include very limited below-ground works and therefore even if the Council considers this particular site to have potential for assets of importance these will remain undisturbed as a result of the proposed development.

#### **Tottenham Area Action Plan (2017)**

The site is not identified for any specific use within the Tottenham Area Action Plan (TAAP). Save for the small northern part of the Site identified as LSIS (discussed above in reference to Policies SP8 and DM37). The majority of the Site is identified as 'railway lines' and greyed out in the Key Diagram (see below):

FIGURE 1.4: Tottenham Area Action Plan Key Diagram



Nearby allocations include TH12 (Herbert Road) for employment-led regeneration to the northwest of the site (see below) and TH13 (Constable Crescent) for mixed-use employment led development immediately to the north of the site (see below also):

#### TH12: HERBERT ROAD



#### TH13: CONSTABLE CRESCENT



Enterprise's proposed use of the Site would complement these allocated uses.

#### Emerging Local Plan

It is understood that the Council has begun the process of preparing a New Local Plan which will replace the existing Local Plan documents adopted in July 2017. Formal consultation on the New Local Plan: First Steps ran from 16 November 2020 until 1 March 2021. The New Local Plan First Steps Engagement document set out the key issues to be addressed by the New Local Plan, asked open questions about the issues and challenges facing the future planning of the Borough and sought views on options to address them.

Given its relatively early stages, no weight can be given to the emerging Local Plan in determining this planning application.

### **The London Plan**

The London Plan (2021) sets out that each Borough's Local Development Documents must be in general conformity with it, where the London Plan sets out the Spatial Development Strategy (SDS) for the whole of London over the next 20 to 25 years. For economic uses, the London Plan generally seeks to promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London.

The new London Plan policies of principal relevance include **GG2 'Making Best use of Land'**.

**GG2** – is supportive of reuse of previously developed land (PDL). This policy also supports the strategic target of 80% of all journeys to be made using sustainable travel modes.

### **G6: Biodiversity and access to nature (*inter alia*)**

Part B of the Policy requires Boroughs, in developing Development Plans, should use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks.

Part D sets out that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. As set out above, Enterprise's proposals are supported by a Preliminary Ecological Appraisal which is summarised in greater detail below.

**London Plan policy E4: Land for industry, logistics and services to support London's economic function** is also relevant in so far as it supports making provision for, and the varied operational requirements of, a flexible range of employment, and employment generating, uses.

None of the London Plan's detailed policies relate specifically to Enterprise's proposed rental vehicle premises use but its policies are generally supportive of increasing provision of sustainable modes of transport and reducing parking pressures, and of increasing employment and improving access to jobs generally. For example, for economic and employment generating uses, the London Plan generally seeks to promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London.

When read as a whole, the proposals accord with the Development Plan.

The **Mayoral CIL** is £60 per sq.m for 'All Development' in Haringey.

Any new build – that is a new building or an extension – is only liable for CIL if it has 100 square metres or more of gross internal floor space. For the avoidance of doubt, a planning application for the change of use of an existing building will not be liable to CIL unless it involves an extension which provides 100 square metres or more of additional floorspace.

In this case the proposal is for change of use of an existing site, and railway arches. It proposes just 78 sq.m of floorspace to be used as ancillary office and staff welfare facilities within two of the existing arches, but these are currently used in association with the Site's existing / former use meaning that the proposals here generate 0 sq.m of new (or additional) floorspace and are subject to a £0 CIL charge.

**Haringey CIL** will be chargeable on the net additional increase in floorspace (gross internal area) of all new development where the gross internal area is at least 100 square metres. As set out above, in this case the proposal amounts to around 0 sq.m of new (additional) floorspace.

However, the Council's CIL Charging Schedule sets out that "*all other uses*", such as that proposed here, are subject to a £0 per sq.m charge in any event.

### **National Planning Policy Framework (NPPF 2021)**

The National Planning Policy Framework (NPPF) sets out the Government's required approach to planning and is material to the determination of planning applications. At the heart of the NPPF is the presumption in favour of sustainable development (paragraph 10). The framework states that '*proposals that accord with an up-to-date development plan should be approved without delay*' (paragraph 11(c)).

A key objective of the Framework (Chapter 6) is to build a strong, competitive economy. It outlines that '*planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*' (paragraph 81) (our emphasis underlined).

Another overarching objective of the NPPF is to make effective use of land to meet development needs whilst improving the environment and ensuring safe and healthy living conditions (paragraph 119). It attaches substantial weight to the value of using suitable brownfield land within settlements and supports the development of under-utilised land (paragraph 120(c)) (our emphasis underlined).

Good design is another key aspect of the NPPF, paragraph 126 states 'Good design is a key aspect of sustainable development as it creates better places in which to live and work and helps make development acceptable to communities'.

In addition, Chapter 9 of the NPPF sets out to promote sustainable transport. Its definition of Sustainable Transport Modes is set out in Annex 2 of the NPPF, and includes "*car sharing*" as well as "*zero emission*" and "*ultra low emission vehicles*". Paragraph 108 of the NPPF sets out that in assessing specific applications for development, it should be ensured that appropriate opportunities to promote sustainable transport modes can be – or have been – taken up (paragraph 110(a)).

Paragraph 111 sets out that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

### **Planning Assessment**

#### **Key Benefits of Enterprise's Proposed Use**

- Regeneration of an underutilised previously developed site
- A modern, active and commercially viable employment generating use
- Investment to secure the site's long term future
- Requires limited built development at the site such that it could be returned back to its original, albeit much improved, state should Enterprise leave the site in the future

- Employment generation with opportunities for at least 8 jobs (initially) directly at the site and others potentially in supporting services and industries
- Flexible provision of alternative sustainable transport modes for the benefit of local residents and businesses – sustainable vehicles by the hour or day (or longer)
- A modern, evolving fleet keeping pace with environmental technology
- Reducing local parking pressure by promoting a reduction in private vehicle ownership and making more efficient and lower (or zero) emission vehicles available to local residents and workers as and when they need them.

### **Viable Active Employment Generating Use**

The proposal site ('The Site') is part allocated within a wider Locally Significant Industrial Site (LSIS) but has been underutilised for some time. It sits between residential uses to the west and employment uses to the east meaning any future use must not only deliver employment, and a use that will not compromise employment uses within the wider allocation, but must also deliver a use that is sympathetic to and compatible with those more sensitive residential uses to the west.

Enterprise's proposals here do just that. They represent significant investment by the company at this otherwise underutilised previously developed site. To put their investment into context, a new branch typically requires investment of between £500,000 and £750,000 initially, on top of growth in supporting supply chains and service providers. Continued investment in the site, and local area by its employees and customers for example, will also be generated throughout Enterprise's occupation and operational lifespan.

Importantly, Enterprise's rental vehicle premises use is an employment generating Sui Generis use, and will employ around 8 people initially, with 6 'management' and 2 valet/drivers anticipated here initially. Additional jobs will be created, and sustained, in supporting services and industries also. Enterprise's proposed rental vehicle premises use is an employment generating Sui Generis use. Although Sui Generis, as a result of its wider practices not falling within a single use class and therefore forming 'a class of its own', Enterprise's use comprises of operations that of themselves would fall within a range of B (and former B) use classes. For example, rental vehicle storage and distribution would fall within use class B8; the wash bay functions would fall within former use class B1c (now E.g.iii.), and the ancillary office use would of itself fall in former B1a use (now (E.g.i.)).

However, Enterprise's use at this particular Site will predominantly comprise rental vehicle storage which falls within use class B8. At this Site, the rental vehicle storage is likely to form a greater proportion of Enterprise's use here given the Site's size and nature generally, such that Enterprise's proposals here comprise their Sui Generis rental vehicle premises use and open rental vehicle storage (within Use Class B8) specifically.

As an employment generating use, the company has won numerous employment awards, and training and development of its employees, and 'promoting from within', are at the core of Enterprise's culture. These opportunities for career growth will be available to local people.

Enterprise requires the site to be secure, particularly out of operational hours. This means that a combination of bollards, fences and gates are required around the site boundary, as they are now, but the proposals have been designed to allow views into the Site to emphasise the site's active use and animation of space within. The Site will remain open at all times during operational hours. When the

rental vehicle premises is closed the Site will be secured but access to the Car Club vehicles, and by Network Rail to the south west of the Site, will be available 24/7.

In particular recognition of Development Plan policies SP8, DM37 and London Plan Policy E4 (those policies considered most important to the determination of Enterprise's proposals here), and of the NPPF's economic development policies, Enterprises proposals represent a serious, and commercially viable, employment generating development that will be delivered as soon as possible following planning permission being granted. Significant weight should be placed on supporting economic growth and productivity as set out in the NPPF.

Another overarching objective of national and local planning policy is to make effective use of land to meet development needs whilst improving the environment (paragraph 119). The NPPF in particular attaches substantial weight to the value of using suitable brownfield land within settlements and supports the development of under-utilised land and buildings (paragraph 120(c)).

On this basis the proposed development should be considered acceptable in principle, and it accords with the Development Plan policies of principal relevance. In delivering economic growth and reuse of previously developed land the proposals should also be given significant and substantial weight in the planning balance and as such the proposals should be approved without delay.

### **Sustainable Neighbourhood Use**

Enterprise's use directly provides an alternative, sustainable, mode of transport to private car ownership and will help reduce the need for local residents and employees to own a car. "Daily rental" cars operate as shared vehicles with multiple customers sharing the same vehicle in any given day, week, month or year, helping to reduce congestion and improve air quality versus private car ownership. The proposal could also lead to reduced demand for car parking in the wider area in providing an alternative to private car ownership. In this location, Enterprise considers that the mix of uses available in the wider area lend themselves readily to patrons who are likely to utilise a vehicle share offer, and this is further supported by the submitted Transport Statement.

Enterprise's use will also include provision, likely to be two vehicles initially, for its Car Club scheme. Enterprise's Car Club provides members with 24/7 access to a choice of new cars and vans parked locally to where they live, work and study. Car Club, and rental vehicles generally, provide local people with access to a vehicle without the need to own one, and are considered to offer social and environmental benefits as a result. Enterprise also has the largest Car Club network in the UK and it has been estimated that car clubs produce 72% lower emissions than the average UK car and each of Enterprise's Car Club vehicles takes around 20 private cars off the road.

Moreover, the average age of Enterprise's rental fleet is less than 12 months old, meaning emissions standards and efficiencies are best in the industry and significantly better than the average vehicle emissions at large. In addition, Enterprise's hybrid fleet is increasing all the time and Enterprise anticipate that within 12 months they will have doubled the number of hybrid and electric vehicles within their fleet. Its Car Club currently runs about 50% of its fleet as hybrid or electric vehicles; and in both rental and Car Club fleets, the number of hybrid and electric vehicles will continue to increase as demand, and supply, requires. Enterprise will install Electric Vehicle charge points in accordance with demand and increase the number as demand for their electric fleet grows.

The site can store around 100 rental vehicles. However, for this site to operate effectively Enterprise would expect that around 90% of rental vehicles available from this site will be in use, and away from site, at any one time.

It should be emphasised that the significant majority of “car parking” will be used by Enterprise for storage of its rental vehicles, rather than parking in its traditional sense. To reduce parking demand, Enterprise offers a Pick-Up/Drop-Off service to every customer. In addition, Enterprise does not permit customers to park on site (reflective of in most instances its customers using Enterprise to rent a vehicle because they do not have alternative means of access to one). Similarly, in the majority of instances, Enterprise’s employees will not need to park their own vehicles at branch as they routinely move Enterprise’s rental vehicles between branches at the beginning and end of each working day, as part of Enterprise’s ‘Fluid Fleet’ – and use those rental vehicles to get to and from work. When rental (and Car Club) vehicles are not being used to access the site, staff and customers will be encouraged to use other sustainable modes of transport to access the site.

Ultimately, Enterprise’s use will contribute to the Council’s ambition to promote sustainable transport provision in compliance with Development Plan policies and national policy as set out in the NPPF.

### **Design (Amenity and Appearance)**

National planning policy outlines that planning decisions should take local circumstances into account, to reflect the character, needs and opportunities of each area.

The development proposed here would not conflict with the existing surrounding built form and would positively utilise an underutilised site which in turn would improve the appearance of the site and the contribution it makes to the surrounding area.

The appearance of the site will not change materially from its existing state but it will be tidied up and generally improved ahead of Enterprise’s occupation. Their rental vehicle office and staff welfare area will utilise two of the railway arches and the external areas of the site will be improved, including through resurfacing where necessary. It is considered that the change will be positive and will improve the visual appearance of the site.

Enterprise requires the site to be secure, particularly out of opening hours. This means that a combination of bollards, fences and gates will be required around the site boundary, as they are now, with existing provision retained, and improved, where possible. The proposed boundary treatment will allow views into the site, where possible, to emphasise the site’s active use and animation of space within, whilst maintaining Enterprise’s operational requirement to move its vehicles around the site as necessary. However, it should be noted that public visibility into the Site is relatively limited as a result of the well established street trees along Page Green Road which sit outside of the Site boundary and will be entirely unaffected by Enterprise’s proposals.

It is considered that due to the nature of the proposed development there will be no adverse amenity impact on the local area as a result of the proposals, and moreover, any impact is likely to be positive.

### **Highways**

Paragraph 111 sets out that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

As set out above under “Parking/Vehicle Storage”, existing vehicular and pedestrian access arrangements to the site will be utilised and there are no amendments to the existing access required to facilitate the proposed use in this regard.

As also set out above, there is very limited demand for car parking (in its traditional sense) arising from the proposed use and only a very limited number of private vehicle trips will be generated as a result

of the proposed use. Enterprise's use will predominantly comprise open storage of its rental vehicles – which can more than adequately be accommodated at the application site and will be subject to Enterprise's management based on its expertise in this regard.

The site is in a highly sustainable location with ample amenities within short walk or cycle distance and several bus stops and three railway stations offering frequent services to destinations across London are accessible within a five to 12 minute walk from the site.

When not accessing the Site in operational rental vehicles staff will be encouraged to use public transport, walk or cycle.

Moreover, the proposal itself delivers the provision of sustainable transport modes as defined by Annex 2 of the NPPF, where it actively provides vehicles, including zero and ultra low emission vehicles, for car sharing purposes.

An ATZ Assessment has been undertaken in support of the development proposals. Five key destinations have been identified and the worst location along the route to each destination has been reviewed against TfL's healthy streets criteria, with suggestions made for potential improvements for the consideration of Haringey Council and TfL to implement. No improvements are necessary to support this development.

As part of the ATZ Assessment, a review of collision data has been undertaken. The review concluded that since the development reduces private car ownership and results in a limited number of vehicular trips from Section 6, the development proposals would not be anticipated to exacerbate existing collision trends.

The accompanying Transport Statement concludes that the proposed development would generate a maximum of six two-way vehicle trips in the AM peak and four two-way trips in the PM peak with a maximum of 40 trips over the course of an average weekday. However, the site has most recently been used as a combined scaffolding and motor vehicle repair business and the trip generation associated with Enterprise's proposed use as set out in the submitted Transport Statement should be netted off from that existing use which would further reduce the 'net' number of trips associated with Enterprise's proposed use at the site.

It is also important to recognise that the nature of Enterprise's proposed use at the site has the potential to reduce wider vehicle ownership and use, and reduce demand for on-street parking as a result.

The Transport Statement also demonstrates that the proposed development can be serviced from the access point on Page Green Road and larger vehicles, such as refuse collection vehicles can also enter the site during the operational hours as illustrated on the tracking plans included within its Appendix D.

Ultimately, in accordance with the requirements of the NPPF, the submitted Transport Statement has demonstrated that safe and suitable access to the site can be achieved for all users and there will be no significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety. The submitted Transport Statement in particular concludes that the development would not adversely impact on highway safety or result in a severe residual impact on the highway network and that the site is in a highly sustainable location. As such, the proposed scheme is acceptable in regard to transport and highways matters in line with paragraph 111 of NPPF.

## **Operation (Amenity)**

In this instance, Enterprise's proposed use would be restricted to normal working hours and would not involve odours or fumes and extractors, unlike the former and other potential uses at the allocated employment site.

Washing and 'smart' repair of rental vehicles will be undertaken by Enterprise albeit not outside of normal working hours, and in a manner commensurate with this location. All washing and 'smart' repairs will also be undertaken within the proposed rent vehicle wash bay which is also located to the rear of the Site adjacent to the railway to the south of the Site and away from the nearest noise sensitive receptors (homes to the west of the Site). In this regard, and notwithstanding Enterprise's required operating hours are reflective of normal working hours, Enterprise's use could represent a significant improvement when compared with the Site's former and potential use within the wider LSIS and where it is also complimentary to the neighbouring employment uses to the east will act as a suitable employment generating 'buffer' between the sensitive uses to its west and the industrial uses to its east.

The above notwithstanding, given the relative proximity of the proposed development to existing residential properties at the other side of Beach Road, a Plant Noise Impact Assessment has been submitted to consider the potential for noise impact arising from Enterprise's proposed rental vehicle wash bay.

The submitted Noise Assessment concludes that the plant as proposed would be below the level where a low impact (at most) may be expected upon the residents at the nearest noise sensitive receptor. Taking into account the likely times and duration of use of the equipment alongside the predicted noise levels, it has been identified that significant adverse impacts are unlikely at the nearest noise sensitive receptors, ensuring compliance with the aims of the NPPF and PPG.

The proposed use has no potential to impact residents in respect of their light, outlook or privacy and all rental vehicles will be driven in and out of Enterprise's site individually, and most often by Enterprise employees.

Enterprise's required hours of operation are: Monday to Friday 8am to 6pm, Saturday 9am to 5pm and Sundays and Bank Holidays 10am to 5pm.

In such circumstances, where there is no conflict, Development Plan or national policies are permissive and provide no justification to withhold planning permission in this instance.

### *Potential for Amenity Impact from Proposed Signage*

Advertisement consent is also required for modest signage within the Site to denote Enterprise's use from users on Page Green Road as well as within the Site itself including and on the rental vehicle office's fascia. Signage is also proposed to direct customers to its various areas within the site such as to the vehicle return area and the Car Club bays for example.

Details of the proposed signage are submitted in support of the application and to demonstrate the high standard of design achieved to fulfil the signage's required purpose for Enterprise, whilst also respecting the local character in accordance with Development Plan policy.

Where signs will be illuminated, these will be internally illuminated, and illumination will be static. Illumination will be limited to Enterprise's logo only and in any event, any illumination will be time and light controlled such that signage will only be lit during operating hours of darkness.

## Ecology and Biodiversity

In recognition that the site sits within a wider Ecological Corridor given it is sandwiched between two active railway lines, a Preliminary Ecological Appraisal Survey Report has been prepared by Ecologylink in support of the proposed development following a site survey undertaken by Ecologylink. The purpose of the survey was to assess the conservation value of the site, including the likely presence of rare or protected species. Any features, habitats or species constituting potential constraints to the development were identified, with recommendations for appropriate further surveys and mitigation.

The Report sets out that no habitats warranting any specific protection were recorded. It also sets out that there were no protected species found on the site that should mean planning permission is withheld and no further surveys are required.

The Report also sets out that the following habitats are present on this Site:

**Table 1.1 Site habitat areas (m<sup>2</sup>).**

| Habitats               | Area m <sup>2</sup> |
|------------------------|---------------------|
| Building (footprint)   | 161                 |
| Hard Surface           | 3540                |
| Ruderal                | 418                 |
| Scrub                  | 149                 |
| <b>Total Site Area</b> | <b>4968</b>         |

None of these habitat areas are high value with the majority of the Site comprising hard surface. Ruderal colonisation had occurred in small areas of the western corner of the site but this habitat provided transient and limited ecological value, reflecting the similar vegetation along the adjacent rail lines. Scrub development was very limited and only associated with the ruderal vegetation, creating some interconnected habitat with the surrounding rail line, although some management had occurred to reduce woody vegetation growth in working areas. This habitat also held limited ecological value to the site. Finally, a number of scattered trees were recorded along the boundaries and within the site entrance off Page Green Road. A number of semi-mature ash trees were recorded on the northern boundary of the site within the rail lines.

## Archaeology

The site is located within an Archaeological Priority Area with Local Plan policy setting out that proposals affecting a designated Archaeological Priority Area will be considered having regard to:

- The significance of an archaeological asset and its setting; and
- The impact of the proposal on archaeological assets; and
- The priority given to preserving and managing the archaeological asset and its setting in situ.

In this instance, whilst Enterprise's proposals are in an Archaeological Priority Area their proposals are for the re-use of a previously developed site comprising entirely of hardstanding. As such, their proposals will include re-surfacing the existing surface where necessary and only very limited below-ground works such that even if archaeological assets are present at the site there will be no impact on them from the proposed development which will retain the site in its existing state and therefore

preserve any potential assets in situ as they are now as ultimately they will remain undisturbed as a result of the proposed development.

### Flood Risk and Drainage

The application site is located in Flood Zone 1 as identified on the Environment Agency's Flood Map for Planning for risk of flooding from rivers and the sea (see below):



This means it is in an area at the lowest risk of flooding as set out in the NPPF. In reference to the requirement for a Sequential Assessment, the NPPF requires that new development is steered toward areas with lowest probability of flooding (paragraph 101). As it is entirely within Flood Zone 1 the proposal accords with the sequential approach set out in the NPPF.

In general terms the proposal is for continued use of a brownfield, or previously developed, site comprising entirely of hardstanding and built development. The use of the Site will change but the proposed use is a 'Less Vulnerable Use' in flood risk terms. It will not result in any additional risk of flooding of the site or its surroundings and will utilise existing drainage arrangements where possible.

Enterprise will operate their wash bay under a trade effluent licence which will be obtained from the statutory undertaker meaning its use, and drainage connection, will be subject of control outside of, and the appropriate drainage of the proposals does not need to be duplicated through, the planning process.

### Air Quality

The site is not located within a defined Air Quality Management Area (AQMA).

The average age of Enterprise's fleet is less than 12 months old, meaning emissions standards and efficiencies are best in the industry and significantly better than the average vehicle emissions at large. In addition, Enterprise's hybrid fleet is increasing all the time and Enterprise anticipate that

within 12 months they will have doubled the number of hybrid vehicles within their fleet. In addition, Car Club currently runs about 50% of its fleet as hybrid or electric vehicles; and in both rental and Car Club fleets, the number of hybrid and electric vehicles will continue to increase as demand, and supply, requires. Initially, as part of this proposal, infrastructure for EV charging points will be installed with provision to be increased as demand for EV rental and Car Club vehicles requires.

In addition, and as already outlined above, Enterprise's rental vehicles reduce the need for people to own their own vehicles by providing access to a wide variety of class-leading vehicles as and when they are needed. Moreover, only a very limited number of private vehicle trips will be generated as a result of the proposed use.

The NPPF (paragraph 110) requires development proposals to take up appropriate opportunities to promote sustainable transport modes and, at its Annex 2, the NPPF includes "any efficient, safe and accessible means of transport with low impact on the environment, including walking, cycling, low and ultra low emission vehicles, car sharing and public transport" as 'Sustainable Transport Modes' (our emphasis underlined).

This proposal is not only taking up an opportunity to promote sustainable transport modes (that will reduce potential impacts on air quality) but is actively providing sustainable transport modes of itself, and is therefore contributing towards tackling air quality directly.

### **Signage**

Enterprise also requires advertisement consent for signage proposed in association with their proposed use of the Site.

The proposals require the display of signage relating to Enterprise's proposed use. The signage proposed includes a totem sign which will be installed within the northern area of the Site to make customers aware of Enterprise's use at the site. The proposed signage also includes a fascia sign above the rental vehicle office's frontage and a sign to direct customers to the vehicle return area through the arches into the southern part of the Site.

Other directional signs, including moveable signs, are proposed to direct customers within the site to the relevant areas such as to the car return area for example.

### **Conclusions**

There are significant and tangible benefits associated with Enterprise's use of the proposal Site; not least returning a site that is currently an under-utilised brownfield site into viable active and employment generating use, contributing positively to the local area and to the street scene generally.

Enterprise's use of the proposal site complies with Development Plan and NPPF policies considered most important to the determination of Enterprise's proposals here and significant and / or substantial weight should be given to these benefits in line with policy set out in the NPPF.

In addition, Enterprise's use will contribute towards and encourage a modal shift away from private car use towards healthy and sustainable transport initiatives and choices, and promotes and delivers a sustainable transport option in compliance with Development Plan and national policy as set out in the NPPF.

In this context, it has been demonstrated that the proposed development can be delivered in an entirely satisfactory manner and represents sustainable development in accordance with the

Development Plan and national planning policy. The “presumption in favour” set out in the NPPF therefore applies and the scheme should be approved without delay.

We look forward to discussing the proposals and hope that Officers share our enthusiasm to facilitate earliest redevelopment of this underutilised site. As such, we look forward to confirmation of the application’s validation as soon as possible.

Yours faithfully,

A handwritten signature in dark ink, appearing to read 'Chris', written in a cursive style.

**Chris Dodds (MRTPI) – Associate Director**

**For and on behalf of Planning Prospects Ltd**

Enc