



Officer Report

Application Number: HGY/2023/1376
Application Type: Approval of details reserved by a condition
Address: Strategic Development Partnership (SDP) Sites, Welbourne, North Island, Ferry Island, Ashley Road East and Ashley Road West, Station Road, London, N17
Proposal: Application for the approval of details pursuant to site-wide condition 16 in relation to Plot C (Welbourne site) of the Tottenham Hale Centre planning permission (LPA ref: HGY/2018/2223) dated 27 March 2019.
Case Officer: Nathan Keyte
Valid Date: 23/05/2023
Applicant: 3
Agent: Refer to Company Name
Matthew Eyre

RECOMMENDATION

Approve

Proposal - Application for the approval of details pursuant to site-wide condition 16 in relation to Plot C (Welbourne site) of the Tottenham Hale Centre planning permission (LPA ref: HGY/2018/2223) dated 27 March 2019.

1. APPROVED DEVELOPMENT

HGY/2018/2223

Demolition works and clearance of existing site to provide a mixed-use development comprising 6 buildings up to 38 storeys in height, which together with pavilion and basement accommodation will provide up to 104,053m of floorspace (GIA), comprising residential (Use Class C3) (up to 1,036 units), retail (Use Class A1-A4), health centre (Use Class D1), office (Use Class B1), leisure (Use Class D2) parking and servicing areas, hard and soft landscaping (including the provision of a new public square), highways works, creation of new vehicular accesses and the realignment of Station Road, decentralised energy network works and other associated works.

Approved – 27.03.2019.

2. CONSULTATION RESPONSE

LBH Carbon Management Team (Pollution):

Having consider the applicant submitted generator supportive information comprising the cover letter and the Diesel Generator Planning Conditions Note prepared by Quinn Ross Consultant Ltd dated 18th May 2023, 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 C (Welbourne site) of the Tottenham Hale Centre planning application HGY/2018/2223 for the following reasons.

- a. As advised in the previous application for similar condition at the other plots refused, 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 though the applicant made reference to a couple of those issues in passing without much details in the submitted Diesel Generator Planning Conditions Note. That aside, the pollution department never agreed to the discharge of the condition for Plot A, D and E as submitted in our recommendation at the time.*
- b. Secondly, the diesel generator will need to meet the Stage V emission limits of its engine category as the applicant was not seem to be in a position to confirm whether the proposed diesel generator will comply with this standard or not as submitted in Page 2 of the report.*
- c. The applicant seem to be referring to 2 different model of diesel generator i.e. TJ 303DW5C and P126T1 for the discharge of both conditions 16 & 17 rather than one as the condition was written with the installation of a single specific diesel generator to achieve both ends.*
- d. Therefore, applicant will need to provide evidence of the above compliances whilst;*
- e. We also need to see how the generators shall be operated with a minimal noise impacts as stated in the supportive information.*

3. ANALYSIS/ASSESSMENT

Condition 16 reads:

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

Prior to the installation of back up diesel generators on the application site, details of generator compliance with EU Stage V Emission Standards for Generator Set Engines shall be provided in writing to and for approval by the Local Planning Authority. Installation shall be in compliance with the approved details and maintained thereafter.

REASON: to protect air quality and the amenity of the area

The application seeks to discharge condition 16 insofar as it relates to Plot C only (Welbourne site).

Sitewide Condition 16 has previously been discharged for Plot D, Ashley Road West (ref: HGY/2022/0485) in July 2022 and for Plot E, Ashley Road East (ref: HGY/2022/4218) in December 2022 and A – North Island (ref: HGY/2023/0042) in February 2023. The information enclosed in this submission is consistent with the details and approach agreed on HGY/2022/0485, HGY/2022/4218 and HGY/2023/0042.

Pursuant to condition 16, the applicant has provided details of the proposed back-up diesel generator. A technical note submitted states that fixed standby generators are exempt from the EU Stage V Emission Standards. It is understood that the 'Medium Combustion Plant Directive (MCPD)' which came into effect from 1st January 2019, does not apply to this type of generator, due to its infrequent use where EU Stage V emission standards are not required. The low run time brings it under the requirement of the EU Stage V emission standards. The proposed generator is an emergency system used only in operation if there is total power failure to the building and will be used exclusively to power critical life-safety systems. With regard to the comment by the LBH Pollution Team that two generators appear to be referenced in the submitted information, this is not understood to be the case. The number 303DW5C refers to the Teksan generator, which utilises the Doosan motor model P126T1 as outlined on page 5 of the submitted technical note.

For an on-site emergency, there is no restriction on the total number of hours a back-up generator can operate for (operators must try to reduce the period and frequency of emergency use 'black start' backup generators can operate for) the number of hours you can test backup generators. A back-up generator is restricted to 50 hours each year under the MCPD for testing and the number of hours it is used must be recorded to demonstrate that the exclusion criteria are met. The technical note indicates the generator will be utilised twice per year for approximately 10 minutes at a time for testing.

Due to its infrequent use therefore, the EU Stage V emission standards cannot readily apply to back-up generators as they run for such a short time during their regular test cycles, their diesel engines do not reach the temperature where the gases that the Stage V filters catch are produced. Site Wide Condition 16 significantly limits the use of such generators and in relation to all the development phases, these are only linked to emergency situations in respect to facilities such as lighting and lifts.

Based on this information, LBH Planning officers are satisfied that the proposed generator complies with the relevant standards and that the condition can be discharged.

4. RECOMMENDATION

GRANT PART DISCHARGE CONDITION 16