

Replacement Two-Storey Office and Welfare Unit at National Grid Tottenham 132kV/275kV Substation

Planning Statement

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

February 2026

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1 Introduction and Project Description

The Application and Purpose of this Document

- 1.1 This Planning Statement has been prepared by National Grid to support a full planning application under the Town and Country Planning Act 1990 to the London Borough of Haringey for the construction of a replacement office and welfare unit and the reconfiguration of car parking located on National Grid owned land within the existing electricity substation adjacent to the A1055, Watermead Way, Tottenham, North London N17 0UL.
- 1.2 A previous application for this site and this proposal was submitted and approved by the London Borough of Haringey in June 2021 (application ref. HGY/2021/1299). This permission has since lapsed, hence the submission of this application in 2025.
- 1.3 The proposed development is to be owned and operated by National Grid for its operational requirements at its Tottenham substation site. It will replace an existing unit comprising single storey brick building with a portacabin extension at the same location within the site which was built in the 1960's and is considered no longer fit for purpose as it does not meet current environmental and inclusive design regulations.
- 1.4 The existing unit has a footprint of 158sq m, and is approximately 3m in height.
- 1.5 The external footprint of the new unit is approximately 184sqm and includes:
 - Two-storey modular unit measuring approximately 19m in length by 10m in width and 6.8m in height.
 - The red line application site boundary covers an area of 0.13 ha and is shown in Drawing A123989-500-DRG-C01-114 Rev P01. The proposed location plan is shown in Drawing A123989-500-DRG-C01-113 Rev P01.
- 1.6 This planning statement should be read in conjunction with the accompanying drawings and documents submitted in support of the planning application and set out below.

Drawings

Drawing Title	Reference
Location Plan	A123989-500-DRG-C01-113 Rev P01
Site Plan	A123989-500-DRG-C01-114 Rev P01
Parking Plan	A123989-500-DRG-C01-110 A123989-500-DRG-C01-111
Building overlay Plan	OPP1204566-PTK-A1-00-D-A-1803 Rev P03
Elevations Plan (all)/ proposed finishes	OPP1204566-PTK-A1-00-D-A-1803 (P03)
Sections Plan	A123989-500-DRG-C01-112 Rev P01
Proposed Floor Plans	OPP1204566-PTK-A1-00-D-A-2001 Rev P06
Existing elevations and Layout	B3111-1900-200 Rev A
Drainage Layout	A123989-500-DRG-C01-106 Rev T02

All drawings have been prepared by COWI.

Documents

Drawing Title	Reference
Design and Access Statement, prepared by COWI	A123989-0002 v. A2.0, dated February 2026
Initial Traffic Assessment Report, prepared by COWI	A123989-R003 v. 2.0, dated 23.05.2025
Flood Risk Assessment, prepared by William Saunders	10292-WMS-ZZ-XX-T-39301-S8-P5, dated February 2026
Geo-environmental Desk Study Report, prepared by Intégral Géotechnique	12822/LP/21/DS, dated March 2021
Preliminary Ecological Appraisal Report and Preliminary Roost Assessment Report, prepared by RSK	2488839, dated 02.05.2025
Habitat Regulations Assessment Screening Report	2488839, dated November 2025

The Site and Surroundings

- 1.7 The wider Tottenham substation site is bounded to the north by the Mowlem Trading Estate, to the east by Pymme's Brook and the Lee Valley Regional Park (also to the south), and to the west by the A1055, Watermead Way.
- 1.8 The Location Plan shows the site location, the wider National Grid landownership boundary, as well as the planning application boundary. The proposed development will take place on land which has been under the control of National Grid since it's purchase in the early 1960's.
- 1.9 The existing welfare and amenity unit (also the site of the replacement unit) is located to the westernmost part of the substation site adjacent to Watermead Way. The existing unit can be seen through the palisade fencing on Watermead Way (see **Plate 1**) and is dominated by the taller substation buildings behind. This land is generally flat with a small patch of poor amenity grassland. The siting of the replacement unit is dictated by a myriad of underground services.

Plate 1: View of existing single storey welfare unit (outlined in yellow) from Watermead Way.



- 1.10 Construction and operational access to the site will continue to be from Watermead Way using the adjacent existing electricity substation entrance (see **Plate 2**) and existing internal road network.

Plate 2: Existing entrance off Watermead Way



- 1.11 The boundary of the substation is primarily defined by a steel palisade security fencing and high brick wall. There is no public access into the National Grid site, with visitor access through security gates off Watermead Way only.
- 1.12 The site is located in Flood Zone 2 (land assessed as having an annual probability of flooding between 1 in 100 and 1 in 1,000 from rivers, or between 1 in 200 and 1 in 1,000 from sea). See Flood Risk Assessment (FRA) section of this report and separate FRA report carried out by William Saunders in February 2026.

National Grid

- 1.13 National Grid Electricity Transmission plc (National Grid) owns the high voltage electricity transmission system in England and Wales and operates the electricity transmission system across Great Britain. The company is responsible for operating the high voltage electricity network, carrying power between power stations and the local electricity supply networks of the Distribution Network Operators (DNOs).
- 1.14 National Grid is regulated by the Office for Gas and Electricity Markets (Ofgem) and through the terms of its transmission licence and obligations under Schedule 9 of the Electricity Act 1989. National Grid is required to operate its transmission system in an economic, efficient, and coordinated manner whilst having regard to the preservation of amenity.
- 1.15 Schedule 9 of the Electricity Act requires National Grid to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological, or physiographical features of special interest and of protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The Schedule also requires National Grid to do what it reasonably can to mitigate any effect which its proposals would have on such features.
- 1.16 National Grids responsibilities under the Electricity Act and the commitments made in carrying out electricity and gas projects are set out in 'Our stakeholder, community and amenity policy' at the following link: <https://www.nationalgrid.com/document/81026/download>

1 Project Description

Proposed Development

- 2.1 The proposed development, as shown in the Site Plan and Landscaping Drawings, comprises:
- Replacement of the existing single storey portacabin unit (location shown in Plate 3) with two storey unit;
 - Reconfiguration of parking spaces (but with number of spaces retained);
 - Repaving of area surrounding new unit and re-seeding/ laying of amenity grass area.
- 2.2 The new unit would be located on the same site as the existing unit (see Location Plan). There are limited facilities within the 132kV switch house, which can be used temporarily during the construction phase.

Plate 3: Site Location (existing single storey portacabin unit shown in yellow)



Image: Landsat / Copernicus

- 2.3 The new unit would provide modern facilities for employees and be in compliance with current environmental and inclusive design regulations. The new unit, being two storey, would provide a net increase of internal floor space of approximately 190sq m compared to existing facilities. This would also provide for any potential future increase in personnel levels on site to 20. The internal layout of the two storey unit is provided in Drawing OPP1204566-PTK-A1-00-D-A-2001 Rev P06.
- 2.4 The proposed development is vital for the ongoing effective operation of the substation, significantly improving the access, facilities, and working conditions for the users.

Design and Access

- 2.5 A Design and Access Statement has been produced to demonstrate the thinking behind the design (including sustainability, energy reduction, and raw material resource efficiency) as well as access elements of the proposed development. Vehicular access for both construction and operational purposes will be solely via the existing National Grid substation access, off Watermead Way and then through the existing road network within the substation.
- 2.6 Finished floor levels will be 360mm above ground level with ramp facilities to the front entrance.

Construction

- 2.7 National Grid intends to commence construction immediately on the granting of planning permission following the discharge of any necessary pre-commencement conditions.
- 2.8 The construction programme to completion is forecast to be six months.
- 2.9 The temporary laydown, welfare, and construction vehicle parking area will be provided for on site adjoining the proposed development and would fall under permitted development rights¹.
- 2.10 Proposed construction hours would be between 07.30 and 17.00 hours, Monday to Friday and 08.00 to 13.00 on Saturday. There would be no construction works on Sundays or Bank Holidays.
- 2.11 National Grid will develop a Construction Management Plan (CMP) which will be available prior to commencement of development on site.
- 2.12 The foundations of the replacement unit are expected to be on piles. Piling methods are expected to be either rotary bored or continuous flight auger to reduce vibration and noise, protecting nearby sensitive equipment, and below ground infrastructure.
- 2.13 The existing ground levels would be retained for the proposed development and no site levelling is anticipated. Hence, earthworks would be minimal and limited to foundations and removal of hardstanding, therefore, minimising associated construction traffic.
- 2.14 The proposed unit is to be formed using multiple insulated pre-fabricated modules. Each module will be individually transported to site and installed into position using a crane.

Site Operation

- 2.15 The proposed unit will provide office and welfare facilities for National Grid employees working within the existing substation site.
- 2.16 Standard operational hours would be 07:00 to 17:00 hours, Monday to Friday and 06:00 to 12:00 noon on Saturdays.

Environment

Traffic

- 2.17 On behalf of National Grid, COWI have prepared an Initial Traffic Assessment Report which accompanies this planning application submission.
- 2.18 The Report provides information to support the planning application including the number and type of vehicle movements during construction and operation periods to conclude that:
- The maximum number of construction vehicles per day will have a negligible impact on the local highway network;
 - The maximum number of operational vehicles per day will have a negligible impact on the local highway network; and
 - The site access via the existing electricity substation is suitable for the forecast increase in vehicle movements with no implication for highway capacity or road safety.

Flood Risk Assessment

- 2.19 The site lies within Flood Zone 2 and within an area protected by flood defences. A Flood Risk Assessment (FRA) has been undertaken and is submitted with this application (doc ref. 10292-WMS-ZZ-XX-T-39301-S8-P1) in accordance with national planning policy.

¹ Under Schedule 2, Part 4, Class A of The Town and Country Planning (General Permitted Development) (England) Order 2015

- 2.20 The accompanying FRA concludes that the proposed development will not increase flood risk to the site itself or the wider catchment area as a result of suitable management of surface water runoff discharging from the site.
- 2.21 Subject to the implementation of the recommended mitigation measures, the proposed development is considered suitable in accordance with the National Planning Policy Framework. The risk from all sources of flooding provided the mitigation measures are implemented are classified as either 'none', 'very low' or 'low'.

Drainage

- 2.22 Roof water will drain to the gravity section of the site's surface water drainage system, downstream of any pumping before it discharges to a public sewer to the west of the site.
- 2.23 The proposed impermeable area will be the same as the existing impermeable area, and proposed car parking spaces would be surfaced in porous macadam.
- 2.24 Foul drainage from the proposed development will enter the site's private foul sewage system, before discharging to a public sewer to the west of the site.
- 2.25 Drainage details (calculations and services) are provided in the accompanying COWI reports.

Ecology

- 2.26 The site is not covered by any ecological designations. The closest statutory designated sites are Lee Valley Special Protection Area (SPA) and Ramsar (940m north) and the Rye Meads Site of Special Scientific Interest (SSSI) (940m north), and the Epping Forest Special Area of Conservation. In addition, Magic Maps indicates that the site falls within the SSSI Impact Risk Zone. However, given the nature, scale, location and context of the proposed development, it does not meet any description of development for which Natural England indicates that they should be consulted, as per Natural England's Impact Risk Zones for Sites of Special Scientific Interest User Guidance (Version 5.4, dated 2 April 2025).
- 2.27 A Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) has been undertaken by RSK. The report concludes that, although the site is within an ecologically strategic corridor, the surrounding grassland offers limited ecological value. With regard to roosting bats, two of the three existing buildings on site have a moderate potential to support them. However, the depth of the underground tunnel system is considered to be a significant enough buffer to absorb noise and vibrations, and the short duration of the works indicates that it would not constitute a significant disturbance. The report also proposes enhancement opportunities through the installation of bird and bat boxes on retained buildings and boundary features, as well as native planting or wildflower enhancement within undeveloped areas of the site. For further detail, refer to the accompanying Tottenham Substation PEA, PRA & BNG Baseline (doc ref. 2488839, dated May 2025).
- 2.28 In addition, a Habitats Regulations Assessment (HRA) Technical Note (doc ref. 2488839, dated November 2025) has been completed and accompanies this application. This report was undertaken to determine whether an Appropriate Assessment is required in respect of the potential for the proposed development to impact internationally important sites designated for their nature conservation interests. The report concludes that the potential for likely significant effects on Epping Forest SAC can be ruled out. It also concludes that all possible significant effects on Lee Valley SPA & Ramsar can be mitigated through standard environmental management practices, in particular through provision of a Construction Environmental Management Plan (CEMP) and a Journey Management Plan (JMP). This can be secured by condition. For further information, refer to the accompanying HRA Technical Note.
- 2.29 In particular, the accompanying HRA Technical Note suggests, at paragraph 3.4.10, that a possible mitigation method in respect of water quality contamination risk to the Lee Valley SPA and Ramsar through provision of a SuDS pond. National Grid confirms its intention to mitigate potential impacts on this SPA and Ramsar, however the provision of a SuDS pond at this site, in practical terms, is

unlikely to be feasible, and that mitigation can be secured in another manner more appropriate to the nature of a substation site.

- 2.30 In addition, the HRA technical note suggests, at paragraph 3.4.3, that construction vehicle traffic should not be routed within 50 metres of the Lee Valley Ramsar. In this respect, National Grid confirms that it is amenable to routing construction traffic using other routes that do not come within 50 metres of this Ramsar site.
- 2.31 In consideration of the foregoing, no significant ecological effects from the proposal on the ecological environment are envisaged.

[Noise](#)

- 2.32 Some construction noise would be associated through HGV construction traffic and the use of equipment on site. Ground conditions are likely to require piled foundations for the replacement unit. As mentioned under 'Construction', the methods used will minimise noise and vibration to any surrounding receptor. Other machinery on site will be subject to standard mitigation measures, for example, on-site generators will be suitably enclosed and appropriately located; and these measures will be set out in the CMP.
- 2.33 Any potential construction noise or vibration would be temporary effects, and thus no significant effects from noise and vibration are expected.

[Visual Impact / Residential Amenity and Lighting](#)

- 2.34 The two storey unit would be visible from the public highway (as is the existing single storey unit – see **Plate 1**). However, within the context of the surrounding substation, particularly the dominant adjacent buildings, existing overhead lines, and pylons, it is not considered that the proposed development will cause any adverse amenity impact on top of the existing landscape framework.
- 2.35 The proposals include for bulkhead lights to south and west elevations on photocell timer and switch override. No new flood lights to be provided for the parking area. In the context of the surroundings and existing conditions, the proposed lighting is not considered to result in adverse effects.

[Contamination / Site Investigation](#)

- 2.36 A Geoenvironmental Desk Study as part of a Phase 1 Contaminated Land Assessment was undertaken for the site to accompany the previous, subsequently approved, planning application (ref. HGY/2021/1299). The objectives of the study were to assess the degree, nature, and extent of any contamination and implications for development, and any geoenvironmental constraints that may be imposed on the development. This report (doc ref. 12822/LP/21/DS, dated March 2021) was undertaken to accompany the previous application for planning permission (ref. HGY/2021/1299).
- 2.37 The report concluded no indication of any past contaminative uses for the site. Whilst made ground would be anticipated during construction, this is not expected to be significant and the current and past site uses would not generate a significant contamination potential. For further detail, refer to the accompanying Phase 1 Desk Study Report.

[Archaeology](#)

- 2.38 The site is located within the Teir 3 Archaeological Priority Area (APA) entitled 'the Lea Valley'. Notably, this is the lowest category of APA. Historic England notes that 'Minor' developments (with a site area of less than 0.5 hectares), such as the proposed development, located within a Teir 3 APA are considered at low risk of causing harm to heritage assets of archaeological interest.
- 2.39 The site is an already developed and integral part of the National Grid Barking Substation, and comprises hardstanding. As such, ground disturbance already occurred within the wider site which may have disturbed any potential deposits within the area proposed for the new building. In addition, the proposed building foundations would comprise piles which would ensure that the ground disturbance during construction is minimised. Therefore, the risk to any potential archaeology assets

is considered low, however, if the Local Planning Authority was minded to further investigate this matter, this could be controlled by condition.

3 Planning Policy

National Planning Policy

- 3.1 The overarching National Policy Statement (NPS) for Energy (NPS EN-1) (November 2023) is part of a suite of NPSs issued by the Secretary of State for Energy and Climate Change. It sets out the Government's policy for delivery of major energy infrastructure. Paragraph 2.5.1 recognises the role of energy to economic prosperity and social wellbeing, and that it is therefore important that our supplies of energy remain secure, reliable, and affordable. Paragraph 3.3.10 highlights the importance of maintaining sufficient supply of electricity to meet demand during the current transition to net zero.
- 3.2 The replacement office and welfare unit will provide modern and adequate facilities to allow substation staff to undertake their roles with regard to National Grid's statutory duty under the Electricity Act to develop and maintain an efficient, coordinated, and economic electricity transmission system in England and Wales.
- 3.3 The National Planning Policy Framework (NPPF) (Department of Communities and Local Government (DCLG), December 2024) sets out the Government's planning policies for England and how these are expected to be applied. It is a material consideration in the decision-making process. The DCLG also published Planning Practice Guidance (PPG) providing detailed planning advice on different subjects relating to the interpretation of planning policy and legislation, and to be used in conjunction with the NPPF.
- 3.4 The NPPF states three overarching planning objectives in achieving sustainable development that underpin both plan-making and decision-taking. These objectives are *'interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*
- a) *An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) *A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generation; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
 - c) *An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigation and adapting to climate change, including moving to a low carbon economy.'*
- 3.5 The new building will replace an existing building within the substation site.
- 3.6 The building will be built on land owned and controlled by National Grid within its existing Barking electricity substation. It will also make use of the existing substation highway entrance and internal access roads for construction and operational vehicles
- 3.7 National Grid has commissioned a series of reports, as outlined in the foregoing, to support the design and development of the proposals and is satisfied that it will not result in significant and/or unacceptable environmental effects.
- 3.8 It is considered that the proposed development is in accordance with the overarching policies of the NPPF.

Development Plan

- 3.9 The Development plan applicable to the proposed development comprises the London Plan (2021), the Haringey Local Plan (2017) including the Tottenham Area Action Plan (2017), and the North London Waste Plan (2022). In addition, Supplementary Planning Documents (SPDs) provide additional guidance in focussed areas.
- 3.10 The London Plan (2021) is the spatial development strategy for Greater London, and it sets out a framework for London's development over the next 20-25 years.
- 3.11 The Haringey Local Plan (2017) comprises Strategic Policies, Development Management Development Plan Document (DPD), Site Allocations DPD, and an Area Action Plan.
- 3.12 Haringey Borough Council is currently preparing their new Local Plan, which is anticipated to be adopted in February 2027. Given the expected timescales for the consideration and determination of the current application, assessment has not been made against the draft new local plan policies.
- 3.13 The North London Waste Plan (2022) identifies opportunities and constraints for waste planning in North London.
- 3.14 Assessment is made in this section against the relevant provisions of the London Plan and the Haringey Local Plan. It is not considered that the proposed development will materially implicate any provision of the North London Waste Plan.

Development Plan Assessment

Principle of Development

- 3.15 The Haringey Planning Policy Map does not indicate that the site is located within any specific land use allocation or designation, and indicates that it is located within the North-east Strategic Industrial Location (SIL) (identified by reference DEA2 in the Tottenham Area Action Plan), which is shown to bound the wider National Grid substation site to the north and west.
- 3.16 In contrast to the above, the Haringey Local Plan Strategic Policies (2017) document shows, at page 43, that the site is located within the above-mentioned SIL. This position is supported by the Report of Handling for the previous permission (ref. HGY/2021/1299), which states at paragraph 6.2 that the site is within a SIL. The London Plan (2021) also shows the location of a SIL in the location of the proposed development, however this map is not of a scale sufficient to show whether the site is within it.
- 3.17 Notwithstanding, it is notable that London Plan Policy E5 *Strategic Industrial Locations* states that SILs should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics, and related capacity to support London's economy. In this respect, the Haringey Local Plan Policy SP8 *Employment* seeks to "...secure a strong economy in Haringey and protect the Borough's hierarchy of employment land, Strategic Industrial Locations, Locally Significant Industrial Sites, Local Employment Areas and other non-designated employment sites." The Policy states that the Council will support local employment and regeneration aims.
- 3.18 Notwithstanding the above-mentioned discrepancy, Policy SP8 supports the proposed development. Whether the site is considered to be within the SIL, or bound immediately to the north and west by it and sharing its industrial character, the principle of the proposed development is acceptable in the context of Policy SP8.
- 3.19 Furthermore, the proposed use is consistent with the existing use, and the building is set in the context of large existing industrial buildings and will therefore not have any significant visual impact.
- 3.20 In consideration of the foregoing, the principle of the proposed development is acceptable in accordance with London Plan Policy E5, and Local Plan Policy SP8.

Design

- 3.21 Local Plan Policy SP11 *Design* requires development proposals to “*Ensure impacts on health, climate change, natural resources and biodiversity are minimised by adopted and improving sustainable design and construction techniques.*”
- 3.22 Policy DM1 *Delivering High Quality Design* states that: “*All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area*”. Policy DM21 *Sustainable Design, Layout and Construction* builds on Policy DM1 by expecting that sustainability and energy efficiency is considered. This includes the use of sustainable materials where possible and consideration to height, scale and finish of the development.
- 3.23 In addition, Policy DM6 *Building Heights* requires all development proposals to be of an appropriate scale which respond positively to the surroundings.
- 3.24 The proposed development module is made from recycled units, consequently reducing the amount of raw materials used. The offsite manufacture of the modular units also allows minimal waste of materials during manufacture. Of that waste, approximately 90% can be recycled.
- 3.25 The proposed development is to be clad in in pale colour to reduce thermal gain. Higher floor to ceiling heights have been specified to aid reduction in heat build-up. Windows within the building would be openable to allow for ventilation and reduce reliance of mechanical ventilation methods.
- 3.26 Whilst it is recognised that this application only relates to a relatively small building unit, the components, design, and environmental efficiency of the insulated pre-fabricated modules to modern standards and regulations is a large improvement on the existing aged structure.
- 3.27 The change in scale from a single storey unit to the two storey unit is not significant when considered in context of the adjacent dominant industrial buildings.
- 3.28 In consideration of the assessment made in this section, the proposed development is considered to comply with Policy DM1, DM6, and DM21 and is therefore acceptable in respect of its proposed design.

Ecology and Biodiversity Net Gain

- 3.29 London Plan Policy G6 *Biodiversity and Access to Nature* seeks the protection and conservation of priority species and habitats, and promote opportunities for enhancing them using Biodiversity Action Plans.
- 3.30 Similarly, Local Plan Policy SP13 *Open Space and Biodiversity* sets out that, *inter alia*,
*“All development shall protect and improve sites of biodiversity and nature conservation, including private gardens through its:
Contribution to wildlife and ecological habitats and, where possible, include green and brown roofs, rainwater harvesting, green walls, bird and bat nesting/roosting opportunities...”*
- 3.31 Policy SP13 is further supported by Policy DM19 *Nature Conservation*, which sets out further requirements, including:
“Development proposals on sites which are [in], 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.”

This policy further explains that in addition to designated sites, proposals “*should seek opportunities to enhance biodiversity wherever possible, such as through appropriate landscaping. Sites in close proximity to SPAs and Ramsar sites should be designed so as not to cause visual or acoustic disturbance to the designated site during the development’s operational phase.*”

- 3.32 In terms of biodiversity, there would be a temporary loss of a small area of amenity grassland during construction of the new unit. The final landscaping proposals include new seeded / turfed grassland

of similar area, hence there would be no net loss of grassland habitat. Other landscaping opportunities within the substation site are limited because of the potential root ingress of more substantial planting on the numerous below surface infrastructure.

- 3.33 The location of the proposed unit will not significantly impact any internationally important sites for ecology. In this respect, a HRA Technical Note (doc ref. 248839, dated November 2025) accompanies this application. Further analysis of this is provided under 'Ecology' within the 'Project Description' section of this Planning Statement.
- 3.34 In addition, and as referred to under 'Ecology' within the 'Project Description' section of this Planning Statement, a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) Report accompanies this application. This report concludes that, despite the site being within an ecologically strategic corridor, the surrounding grassland offers limited ecological value. It also proposes enhancement opportunities through the installation of bird and bat boxes on retained buildings and boundary features, as well as native planting or wildflower enhancement within undeveloped areas of the site.
- 3.35 In respect of Biodiversity Net Gain (BNG), the Haringey Biodiversity Action Plan (BAP) 2023 is a strategic framework set to deliver the policy and legislation requirements for conserving and enhancing biodiversity, including BNG. In accordance with this, and in line with BNG requirements set out in the Town and Country Planning Act 1990 (as amended), the accompanying Preliminary Ecological Assessment (PEA) states that the BNG baseline evaluation as 0.54 total habitat units. It then makes recommendations for enhancement. It is anticipated that adequate BNG can be achieved through a Biodiversity Gain Plan as per a suitably worded condition in accordance with the PEA Recommendations.
- 3.36 In respect of the assessment made in this section, the proposed development is acceptable in respect of London Plan Policy G6, and Local Plan Policies SP13 and DM19.

Flooding

- 3.37 The site is within Flood Zone 2 and thus the National Planning Policy Framework requires a site-specific flood risk assessment to be carried out.
- 3.38 In this respect, Local Plan Policy SP5 Water Management and Flooding requires all development in Haringey to be water efficient during construction and operation and to reduce all forms of flood risk. Under this policy, all development shall *"take account of flood risk vulnerability classification as set out in paragraph 100 of the NPPF and will apply the NPPF Sequential Test and Exception Test."*
- 3.39 This is supported by Policy DM24 *Managing and Reducing Flood Risk*, which aims to ensure that all proposals for new development avoid, and reduce the risk of flooding to future occupants and that they do not increase the risk of flooding. Policy DM25 *Sustainable Drainage Systems* then requires all development proposals to manage surface water in line with the London Plan hierarchy.
- 3.40 In addition, the site is within Flood Zone 2 and thus the National Planning Policy Framework requires a site-specific flood risk assessment to be carried out.
- 3.41 In accordance with this, a Flood Risk Assessment (doc ref. 10292-WMS-ZZ-XX-T-39301-S8-P5, dated May 2025) accompanies this application. This report confirms that the site is covered by the North London SFRA, the Haringey Council Level 2 SFRA, and the London Borough of Haringey Surface Water Management Plan. It also concludes that the development will not increase flood risk to the site itself or wider catchment area due to suitable management of surface water runoff discharging from the site, and that subject to recommended mitigation measures (including raising the floor levels a minimum of 150mm above surrounding ground levels), the proposed development is suitable in accordance with the considerations of the NPPF.
- 3.42 On account of the above, the proposed development is acceptable in respect of Paragraph 100 of the London Plan, and Local Plan Policies SP5, DM24 and DM25.

Contaminated Land

- 3.43 Local Plan Policy DM23 (G) states that *“proposals for new development will only be permitted where it is demonstrated that any risks associated with land contamination, including to human health and the environment, can be adequately addressed in order to make the development safe.”*
- 3.44 The accompanying Phase 1 Site Investigation Report (doc ref. 12822/LP/21/DS) concludes that there is no indication of any past contaminative uses at the site. Whilst made ground would be anticipated during construction, it is not expected to be significant and the current and past site uses would not generate a significant contamination potential. For further detail, refer to the accompanying Phase 1 Desk Study Report.
- 3.45 The proposed development is therefore considered acceptable in respect of Local Policy DM23 (G).

Archaeology

- 3.46 The Proposals Map indicates that the site is within the Lee Valley Archaeological Priority Area (APA). This is a Tier 3 APA, which the London Plan Notes to be *“...a landscape scale zone within which there is evidence indicating the potential for heritage assets of archaeological interest to be discovered.”* The Haringey DPD Policy DM9 H-I require proposals to assess the potential impact on the significance of historical assets and the impact of proposals on said assets.
- 3.47 Notably, Teir 3 is the lowest category of APA. In such areas, Historic England notes that ‘Minor’ developments (with a site area of less than 0.5 hectares), such as the proposed development, are considered at low risk of causing harm to heritage assets of archaeological interest.
- 3.48 The site is an already developed and integral part of the National Grid Barking Substation, and comprises hardstanding. As such, ground disturbance is likely to have already occurred within the wider site which may have disturbed any potential deposits within the area proposed for the new building. In addition, the proposed building foundations would comprise piles which would ensure that the ground disturbance during construction is minimised. Therefore, the risk to any potential archaeology assets is considered low, however, if the Local Planning Authority was minded to further investigate this matter, this could be controlled by condition.

Community Infrastructure Levy (CIL)

- 3.49 Haringey Council’s Community Infrastructure Levy (CIL) is a charge on development to help fund infrastructure. This application would result in new gross internal floorspace (GIA) of greater than 100 square metres and is therefore required to follow the CIL process. At this stage, this requires the submission of CIL Form 1. This is included with this application.

4 Summary and Conclusions

- 4.1 This Planning Statement sets out details of the proposed replacement office and welfare unit and re-configuration of existing car parking facilities at National Grid's Tottenham Substation.
- 4.2 The current unit is no longer fit for purpose and thus must be replaced in accordance with the submission documents that accompany this application.
- 4.3 The principle of development was established through approval of the 2021 application for the same proposal. National Grid now seeks to proceed with the development thereby approved, and now lapsed, and therefore seek new planning permission. Furthermore, the existing building has continued to be utilised since the 2021 application, providing further justification for its replacement as its lifespan has been extended well into 2026.
- 4.4 The planning policy appraisal set out within this report concludes that the proposed development fully accords with the current development plan and there are no material considerations that indicate otherwise.
- 4.5 A suite of technical reports have been undertaken on behalf of National Grid to supplement this application. They conclude that, subject to carrying out the recommended mitigation, and the implementation of appropriate planning conditions, the proposed development is acceptable and in accordance with the Development Plan.

