Planning Sub Committee Item No.

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2025/0617 **Ward:** Northumberland Park

Address: 37-39 West Road N17 0RN

Proposal: Demolition of all buildings and structures and the construction of a building for flexible Class B2 general industrial, B8 storage and distribution, and E(g)(iii) light industrial uses with ancillary office, associated service yard, access point, car parking, and landscape planting.

Applicant: HE5 UK Enterprises 25 GP Limited

Ownership: Private

Case Officer Contact: Sarah Madondo

Date received: 21/03/2025

Last amended date: 26/06/2025

1.1 This application has been referred to the Planning Sub-committee for a decision as it is a major application that is also subject to a section 106 agreement.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- There is strong policy support for intensification of employment space within this Strategic Industrial Location.
- The proposed development would result in a total floorspace of 6,044 sqm flexible employment floorspace, an increase of 229.8 sqm.
- The proposed scale and design of the development is appropriate within the context of the site and would be of good quality, making a positive impact on the visual amenity of the area.
- The development would provide a sufficient number of car and cycle parking spaces, would encourage sustainable transport initiatives and include appropriate mitigation measures to minimise impacts upon the public highway.
- The scheme would deliver high quality commercial space, increase density of employment uses, and provide new jobs with training benefits for the local

community. These outcomes comply with the relevant planning policies along with aligning with the Council wider economic strategy for the Borough.

- The scheme has been designed to include a range of sustainability measures delivering a reduction of 111% carbon dioxide emissions on site.

2. RECOMMENDATION

2.1 That the Committee resolve to GRANT planning permission and that the Director of Planning and Building Standards or the Head of Development Management is authorized to issue the planning permission and impose conditions and informatives subject to the signing of a legal agreement providing the obligations as set out in the Heads of Terms below.

2.2 That the legal agreement referred to in resolution (2.1) above, is to be completed no later than 3 months from the date of the Planning Sub-Committee meeting or within such extended time as the Assistant Director for Planning, Building Standards & Sustainability/Head of Development Management & Planning Enforcement shall in their sole discretion allow; and

2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission shall be granted in accordance with the Planning Application subject to the attachment of the conditions and informatives; and

2.4 That delegated authority be granted to the Head of Development Management or the Director of Planning and Building Standards to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions and informatives as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee.

<u>Summary Lists of Conditions, Informatives and Heads of Terms</u>

Summary of Conditions (the full text of the recommended conditions can be found in Appendix 1 of this report).

Conditions

1. Development begun no later than three years from date of decision
2. In accordance with approved plans
3. Materials submitted for approval
4. Land contamination
5. Unexpected contamination
6. Demolition/Construction Environmental Management Plans

7. Demolition Management Plan and Construction Management Plan (with Demolition Logistics Plan and Construction Logistics Plan)
8. Restrictive uses classes
9. Cycle Parking Design and Layout
10. Surface Water Drainage
11. Secure by design accreditation
12. Energy Strategy
13. Overheating
14. Urban Greening factor
15. BREEAM
16. External lighting
17. Boundary treatment
18. Plant Noise
19. Delivery/Service plan and Waste Management
20. Disabled parking bays
21. Car Parking Design and Management Plan
22. Electric Vehicle charging
23. Hard and soft landscaping works
24. Tree Protection
25. Living Roofs
26. DEN connection
27. Management and Control of dust
28. Considerate construction
29. Fire Statement

Informatives

1) CIL
2) NPPF
3) Land Ownership
4) Hours of construction
5) Party Wall Act
6) London Fire Brigade
7) Thames Water
8) Advertisement
9) Secure by design
10) Pollution

Section 106 Heads of Terms:

1. Carbon Mitigation

- Be Seen commitment to uploading energy data
- Energy Plan
- Sustainability Review
- Carbon offset contribution to be calculated at £2,850 per tCO2 plus a 10% management fee at the Energy Plan and Sustainability stages

- Future Decentralised Energy Network (DEN) (and associated obligations).

2. Commercial Travel Plan

   - A travel plan-monitoring fee of £3,000 per annum for a period of 5 years.

3. Employment Initiatives – participation and financial contribution towards Local training and Employment Plan.

   - Apprenticeship support fees of £1,500
   - 25% of skills training
   - Provide a support fee of £1,500 per apprenticeship towards recruitment costs
   - 5% of the on-site workforce to be Haringey resident trainees
   - Submission of an employment and skills plan
   - No less than 20% of local labour. Residents shall be employed for a minimum of 26 weeks
   - One full time apprenticeship per £3million development cost (up to max. 10% of total construction workforce
   - Provision of financial contribution £51,448.32 at which will be used by the council to provide and procure the support necessary for local people who have been out employment and / or do not have the skills set required for the jobs created.

4. Construction Logistics and Management Plan

   - The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £15,000 (fifteen thousand pounds) to cover officer time required to administer and oversee the arrangements.

5. Highway Improvements works.

   - S278 Highways Works
   - Footway improvement works
   - Access to the Highway, measures for street furniture relocation
   - Carriage Markings
   - Improved pedestrian infrastructure
   - Access and Visibility requirements
   - Provision of new vehicle access on West Road
   - Removal of redundant dropped kerbs
   - Vehicle crossovers
   - Installation of new parking bays
   - Associated Road markings
   - Repair/reinstatement of new footway

- Stage 1 & 2 Road Safety Audits

6. Parking Management contribution

- The applicant would be required to contribute the amount of £24,000 (twenty-four Thousand Pounds) for the Highway to undertake a review of the current parking management measures on West Road and local roads within the Tottenham Event Day CPZ for the implementation of parking and loading measures and potential changes to the CPZ operational hours.

7. Tree planting

- Contribution of £9,000 towards planting of street trees.

8. Monitoring Contribution

- 5% of total value contribution (not including monitoring);
- £500 per non-financial contribution;
- Total monitoring contribution to not exceed £50,000

2.5 In the event that members choose to make a decision contrary to officers' recommendation members will need to state their reasons.

2.6 In the absence of the agreement referred to in resolution (2.1) above being completed within the agreed time period, set out in (2.2) provided for in resolution (2.3) above, the planning permission be refused for the following reasons:

1. *The proposed development, in the absence of a legal agreement securing sufficient energy efficiency measures and/or financial contribution towards carbon offsetting, would result in an unacceptable level of carbon dioxide emissions. As such, the proposal would be contrary to Policies SI2 and SI 4 of the London Plan 2021, Local Plan 2017 Policy SP4 and Policy DM21 of the Development Management Development Plan Document 2017.*

2. *The proposed development, in the absence of a legal agreement securing sustainable transport measures, would have an unacceptable impact on the safe operation of the highway network, giving rise to unsustainable modes of travel. As such, the proposal would be contrary to London Plan Policies T1, T2, T6, T6.1 and T7, Local Plan Policy SP7 and Policy DM31 of the Development Management DPD.*

3. *The proposed development, in the absence of a legal agreement to work with the Council's Employment and Skills team to provide employment initiatives would fail to support local employment, regeneration and address local unemployment by facilitating training opportunities for the local population. As such, the proposal is contrary to Policy SP9 of Haringey's Local Plan 2017.*

4. *The proposed development, in the absence of a S.278 agreement securing Brantwood Road Highways Works, would have an unacceptable impact on the*

highway network. As such, the proposal would be contrary to London Plan Policies T1, T2, T6, T6.1 and T7, Local Plan Policy SP7 and Policy DM31 of the Development Management DPD.

2.7 In the event that the Planning Application is refused for the reasons set out in resolution (2.6) above, the Head of Development Management (in consultation with the Chair of Planning Sub-Committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:

(i) There has not been any material change in circumstances in the relevant planning considerations,
(ii) The further application for planning permission is submitted to and approved by the Director/ Head of DM within a period of not more than 12 months from the date of the said refusal, and
(iii) The relevant parties shall have previously entered into the agreement contemplated in resolution (1) above to secure the obligations specified therein.

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3.0 PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS

3.1 Proposed development

3.1.1. This is an application for the demolition of all existing buildings/structures and the construction of a single speculative building for flexible B2 general industrial, B8 storage and distribution, and E(g)(iii) light industrial uses with ancillary office, associated service yard, access point, car parking, and landscape planting.

3.1.2. The development proposal seeks to make the most efficient use of the site by redeveloping it to provide a single building, up to a maximum height of 17.8m.

Image 1: Arial view of site

3.2 Site and Surroundings

3.2.1 The site includes approximately 5,814/64,486sqft GIA of existing floorspace and is situated in an established industrial area. It is occupied by the F&J Arpino Wholesale building on the western side of West Road, used for storage and commercial purposes, and is surrounded by other large-scale employment buildings, primarily with industrial and commercial uses. The site is designated as a Strategic Industrial Location (SIL) and within Flood Zone, 2.

Image 2: Site location plan.

3.2.2 The surrounding area is characterised by industrial and commercial uses. The site also lies within the Tottenham Area Action Plan (TAAP) area and the site has a PTAL value of 2, considered 'poor' access to public transport services. There are two bus services available within 2 to 6 minutes' walk of the site, and Northumberland Park Station is a nine-minute walk away.

Image 3: Bird's Eye View of the proposed building/surrounding sites.

3.3 Relevant Planning, Enforcement history and Appeals

<u>37 West Road N17</u>

OLD/1966/0937 Change of use to storage of an existing industrial building and extension of structure to form a loading bay. **GRANTED**.

3.4 Relevant Enforcement History

3.4.1 There is no enforcement history connected to this property.

4.0 CONSULTATION RESPONSES

4.1 Quality Review Panel

4.1.1 The scheme has been presented to Haringey's Quality Review panel on two occasions.

4.1.2 Following the Quality Review Panel meeting on the 22nd of January 2025, (see report in Appendix 2), the Panel offered their 'support' for the scheme, with the summary from the report below:

The QRP commented positively on the principle of the development stating that the proposals would have the potential to create a building of an appropriate quality, but made recommendations on key issues including massing, architecture, materials, landscape and access. A clearer distinction between the warehouse and the offices is needed to simplify the overly complex West Road façade, including moving the warehouse element

back from the offices, and expressing the different functions more clearly in the façade. The applicant should develop important corner elevations, and a more varied roof profile could be considered. Furthermore, QRP advised that the applicant should consider how the building can relate and respond to surrounding and forthcoming development. The window above the main entrance should be reduced in size, and the position of the entrance reassessed. Further design work is required, materials to be simplified, the colour of cladding is too dark, lighter colours should be considered and brickwork should be used to frame entrances, The applicant is to consider more greening of sites and more street trees to be planted as part of the scheme. The access to the site needs further consideration.

4.1.3 Following the QRP comments the applicant has addressed the concerns raised by the panel which is discussed further in the report and a detailed summary of QRP's comments/the officer's responses are in set out in Table 1 under paragraph 6.3.16.

4.2 **Application Consultation**

4.2.1 The following were consulted regarding the application:

(Comments are in summary - full comments from consultees are included in appendix 3)

INTERNAL:

1) LBH Transportation Team: No objections, subject to obligations and conditions.

2) LBH Design: No objections subject to conditions

3) LBH Carbon Management: No objections, subject to conditions and obligations.

4) LBH Waste Management: No objections, subject to condition.

5) LBH Flood & Water Management: No objections, subject to conditions.

6) LBH Pollution Air Quality: No objections, subject to conditions.

7) LBH Arboriculturist Officer: No objections, subject to conditions.

8) LBH Lighting: No objections, subject to condition.

9) LBH Noise: No objections, subject to conditions.

10) LBH Inclusive Economy: No objections.

11) Cllr Bevan: Comments No objections, subject to QRP recommendations being addressed.

EXTERNAL

1) Thames Water: No objection, subject to informative/s regarding sequential approach, sewers, groundwater discharge etc.

2) Designing Out Crime: No objections, subject to conditions.

3) Transport for London: No objections, subject to s278 and s106 contributions.

4) Environment Agency: No objections.

5) London Fire Brigade: Informative recommended.

5.0 LOCAL REPRESENTATIONS

5.1 Neighbouring commercial properties were notified of the planning application having been received. Site notices were also erected in the vicinity of the site for wider publicity purposes.

No representation was received in response to notification and publicity of the application.

6.0 MATERIAL PLANNING CONSIDERATIONS

The main planning issues raised by the proposed development are:

1. Principle of the development;
2. Design and appearance;
3. Impact on amenity of neighbouring properties
4. Parking and highway safety;
5. Energy and Climate Change;
6. Urban Greening, Trees, Ecology and Biodiversity;
7. Flood Risk and Drainage;
8. Air Quality and Contamination
9. Waste and recycling;
10. Employment and Training.
11. Fire Safety.

6.1 Principle of the development

6.1.1. The site is designated as a Strategic Industrial Location (SIL) (DEA1) which safeguards the land for a range of industrial use classes ranging from Class E(g) (Commercial Business and Service – formerly Class B1), Class B2 (General Industrial) and Class B8 (Distribution or Storage).

6.1.2 The National Planning Policy Framework (NPPF) encourages Local Authorities to help create the conditions in which businesses can invest, expand and adapt, stating that significant weight should be placed upon the need to support economic growth and productivity, taking into account business needs and wider opportunities for development.

6.1.3 The London Plan (2021) Policies E4 and E5 state that the retention, enhancement and provision of additional industrial capacity should be prioritised in locations that:

1. are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport;

2. provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population;

3. provide capacity for micro, small and medium-sized enterprises;

4. are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments subject to existing provision; and

5. support access to supply chains and local employment in industrial and related activities.

6.1.4 Strategic Policy SP8 of the Local Plan indicates that there is a presumption to support industry and business in the borough through safeguarding designated land for a range industrial use. The policy states that the Council will 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 forecast demand is for an additional 23,800sqm of B Class floor space up to 2026. This forecast demand is to be met through:

- The reconfiguration and re-use of surplus employment designated land in B2 and B8 Use Classes;
- The intensification of the use of existing employment sites (where possible);
- The provision of B1a/b floor space as part of mixed-use development on suitable sites, including town centre sites; and
- The protection of existing viable B Class Uses on designated and non-designated sites.

6.1.5 In addition, the policy also says that the Council will:

- Support local employment and regeneration aims;
- Support environment polices to minimise travel to work;
- Support small and medium sized businesses that need employment land and space; and

- Contribute to the need for a diverse north London and London economy including the need to promote industry in general in the Upper Lea Valley and in particular, promote modern manufacturing, business innovation, green/waste industries, transport, distribution and logistics.

6.1.6 Policy NT2 of the Tottenham Area Action Plan (TAAP) states that the Council will support development proposals within Northeast Tottenham SIL areas which:

- Increase job density and help to meet Haringey's employment needs;
- Enable small firms to start-up and grow within flexible industrial space; and
- Improve the interface between industrial areas and the Lee Valley Regional Park.

6.1.7 Policy DM37 Part A of the Development Management DPD states that, within SIL areas, proposals for the intensification, renewal and modernisation of employment land and floorspace will be supported where the development proposal:

- Is consistent with the range of uses identified in Policy SP8 of the Local Plan (these include waste/recycling, transport, logistics and distribution amongst others).
- Allows for future flexibility for a range of business types and sizes;
- Provides adequate space for on-site servicing and vehicle waiting/movements;
- Enhances the quality of the local environment and business area; and demonstrably improves the functionality of the site for employment proposes including improvements in the quality/type of employment space, quality/density of jobs on-site and the site's contribution to the Council's wider employment objectives.

6.1.8 The application site is within the Central Leaside Business Area, which is part of a Strategic Industrial Location (SIL), located within the North East Tottenham area identified within the Tottenham Area Action Plan. The proposed net increase in internal floor space would be approx. 229.8 sqm, resulting in an overall 6,044sqm of new floorspace. Therefore, the site would provide enhanced employment use and economic benefits particularly in terms of securing a modern, viable use of the site and contribute towards policy objectives for accommodating industrial land and supporting economic growth. The proposal is therefore strongly supported by National, Regional and Local Policy.

6.2 Design and Appearance

6.2.1 DM Policy (2017) DM1 'Delivering High Quality Design' states that development proposals should relate positively to their locality, having regard to, building heights, form, scale & massing prevailing around the site, urban grain, sense of enclosure and, where appropriate, following existing building lines, rhythm of any neighbouring or local regular plot and building widths, active, lively frontages to the public realm, and distinctive local architectural styles, detailing and materials.

Local Plan (2017) Policy SP11 states that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. Development shall be of the highest standard of design that respects its local context and character and historic significance, to contribute to the creation and enhancement of Haringey's sense of place and identity, which is supported by London Plan Policy D4.

6.2.2 The applicant submitted a pre-application proposal and received guidance on how the scheme could be improved. The proposal was also presented to the Quality Review Panel (QRP), who advised that the proposed development had potential, subject to further amendments. The applicant has addressed the feedback received from the Council's design officer and QRP and, therefore, it is considered that the applicant has adequately addressed the points raised concerning the design of the proposal.

6.2.3 The site accommodates an existing employment building, previously occupied by F&J Arpino Wholesale Ltd, which has since ceased trading, and the building is now empty. The Design and Access Statement states that the existing two storey brick building was constructed in the 1950's, therefore dated and is in poor condition, approaching the end of its serviceable life span. Furthermore, the DAS states that the current site arrangement has a loading bay at the front of the building, directly off West Road which is not desirable as such, the proposed development would rectify this as indicated in the proposal. As a result, this would improve logistics and legibility, as well as positively impacting the street scene. Officers consider that the proposed development will provide modern flexible employment floor space which can accommodate a range of employment uses, making a highly adaptable, sustainable and attractive development, providing employment space which will cater for modern business needs.

Height, Scale & Massing

6.2.4 The proposal is for a single industrial building with 2-storey ancillary office space and open mezzanine floorspace. The proposal would provide a flexible employment space with an open-plan floor area with height of 17.8m. The proposed site is situated amongst a cluster of predominantly large scale, rectangular, employment buildings, within a well-established area designated in Haringey's Local Plan as a Strategic Industrial Location (SIL). The Council's design officer notes that the area in general, and this site in particular, are well suited to industrial intensification. The proposed development is for a significant density and increased height over the prevailing two-storey, low density, light industrial units that dominate the Brantwood Industrial Estate, with a height of 17.8m (ground floor finished floor level to parapet) housing three high ceilinged floors. The overall height of the proposed buildings also falls within the range of nearby buildings, which vary between 6m and 20m. For example, to the northwest of the site, there is a recently approved scheme at 18 West Road which is 12m in height. The design officer further notes that the height of the proposal is

considered acceptable in design terms, as the Local Planning Authority (LPA) would like to see intensification of protected industrial areas such as this.

6.2.5 Furthermore, the design officer further notes that the proposed bulk is a 'full and frank expression of its size' and is acceptable from a design point of view, as an expression of the Council's willingness and expectation to see further intensification of the industrial estate, especially on blocks such as this where there is no detrimental impact on residential neighbours. Notwithstanding that the prevailing surrounding height and bulk of the industrial estate is currently predominantly low-rise, this is not the first higher and larger proposed and/or approved development, especially for the logistics sector. The area is surrounded by new developments which have been granted planning permission, some under construction and others implemented. For example, 175 Willoughby Lane, a short distance to the north-east and currently under construction, site opposite that is18 West Road. Other taller, more intensive recent or current developments in industrial estates nearby include a very recently granted 4-storey workshop on Tariff Road, the next street to the west and a recently completed 7-storey, Shurgard self-storage development a short distance further away to the east.

6.2.6 The design officer notes that the frank expression of the bulk of the proposals has been clearly split into two elements, with the main bulk of the main warehouse volume distinguished from the more slender volume of the entrance and office wing, by means of a slender, full height, glazed slot looking onto the main entrance and each floor's lift/stair lobby and a subtle off-set in the plane of the facade. This responds to two of the recommendations of the Quality Review Panel (QRP), who were overall supportive of this proposal, albeit with a few detailed design suggestions that have all been taken up or responded to by the applicants.

6.2.7 Overall, it is considered that the proposed development responds to the prevailing building pattern in terms of scale and massing. The proposal is for a modern building to provide an energy efficient and visually appealing development, compared to the existing warehouse buildings.

Image 4: Proposed Elevations

Layout

6.2.8 The layout of the proposed development seeks to make more efficient use of the site by intensifying the employment uses. The layout of the proposed building would be L-shaped, with 3-storey ancillary office space and open mezzanine floorspace. The scheme is proposed to be laid out in a simple and logical way to complement the existing urban grain. In terms of the entrance, parking and service area, the proposed building has been set further back from the street following QRP comments ensuring clear access to the frontage area. Vehicle access has been adjusted such that vehicles will pass under the office area which redirects loading away from the street frontage to improve pedestrian safety and security.

6.2.9 As per QRP comments, the elevation facing West Road would be a primary focus consisting of the office area setback with accessible entrance providing legibility to the road frontage. This would provide a key focal point to the frontage with natural surveillance to the adjacent access point, with service yards and parking areas positioned to the rear. The service yard would primarily be located to the rear to allow clear separation between pedestrian and vehicle routes. Car parking provision has been made and located adjacent to the service yards, with access provided via West Road.

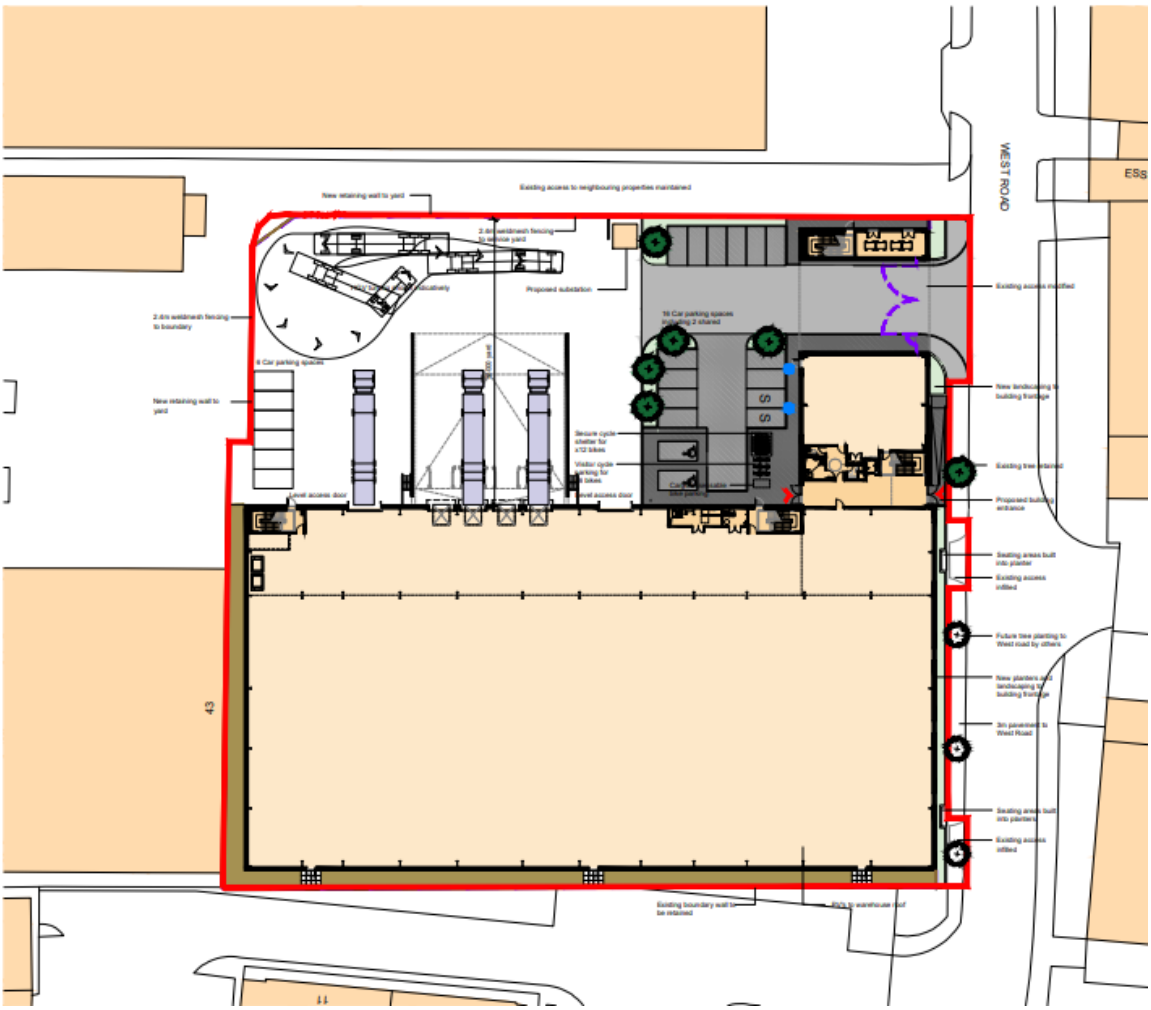


Image 5: Proposed ground floor layout

6.2.10 This layout is considered acceptable, practical and flexible, resulting in efficient use of existing employment land. There is no clear uniform pattern of development evident within the surrounding area. As such, it is considered that the proposal would not be at odds with any distinct urban grain of the area. The layout is practical would be broadly comparable to that of other industrial sites in the wider area, reflecting the scale the Council accepted in other industrial intensification developments and therefore it is considered that the proposed intensification of the site would be appropriate to this setting.

Appearance, Form & Materiality

6.2.11 The proposed development would be of an industrial typology in line with the existing building stock in the SIL area; whilst in appearance would be modern and contemporary. The design officer notes that architectural character and strategy for elevational treatment of the proposals are contemporary, featuring long ribbon windows in a balanced composition of either vertical or horizontal alignment on the main façade facing the street. These will provide passive surveillance, activate the street frontage with visible activity and overlooking. The whole main street

frontage, including the office wing, is to be composed of two materials comprising of brickwork to the ground floor to reference neighbouring older brick properties, and timber cladding to the upper floors of the building, in accordance with the developer's consistent branding, featuring primary cladding materials across all Goya's developments. On the south side of the building, a full height vertical ribbon window ending in a maintenance/emergency door would mark the end of the brick/timber element, whilst to the north, it would end in the internal corner between the office wing and main block.

6.2.12 The design officer further notes that the remainder of the facades of the main block are to be externally finished in profiled metal cladding in a silver-grey finish. This is typical of contemporary industrial architecture and is compatible with integrated loading bay doors. The design approach to increase the brickwork on the elevation facing West Road is welcomed and supported by QRP and the design officer. This would result in a connection to the local character, taking design cues from the surrounding area in terms of materiality and proportions, while maintaining a modern aesthetic look. A condition will be attached for the developer to provide details of all external materials.

Landscaping

6.2.13 In terms of landscaping, the site has a very low landscaping value, most of the site is covered in tarmac or built form. As per QRP comments and pre application advice, the applicant is proposing to improve situation, incorporating high quality landscaping and amenity seating area to the eastern boundary, fronting West Road. The landscaping treatment would comprise of the planting of ornamental shrubs and grasses to soften the street view, increase visual interest, and provide valuable habitat for wildlife. To the rear of the building, the landscape treatment will also incorporate ornamental shrubs and trees to visually break up the extensive hard surfaces. As a result, this would improve the development's relationship with the public realm resulting in a significant enhancement to the green infrastructure. The planting would improve site accessibility for both vehicles and pedestrians by introducing varied greenery. Additionally, the Carpinus hedge along the fence, underplanted with low-growing shrubs, will provide effective screening around the site. The width of the footpath fronting West Road would be increased to allow for future tree planting by the Local Planning Authority (LPA) and to complement the existing tree, which is being retained. The applicant has agreed to make a financial contribution towards the planting of additional street trees via s106 and the details of the landscaping would be secured by a condition.

6.2.14 The design officer notes that one of the most notable benefits of the proposed scheme compared to other typical industrial, logistics and warehousing developments is that the street frontage will not be fenced off. However, to the north and west boundaries, a new 2.4m weld mesh fence would be installed, and the details would be secured via a condition.

6.2.15 Overall, it is considered that the proposed development would be acceptable in design terms, as the proposal would be simple, clean and elegant, with high quality landscaping

design. The new buildings would be of high quality and would relate well to the industrial nature of the area. The height, bulk, scale, massing and layout of the redevelopment would respect the character of the surrounding area, whilst also intensifying the existing employment floor space. The proposed development would make a positive contribution to the area and would improve the character and appearance of the site, the street scene and the wider locality. The proposal is considered acceptable in terms of design and complies with the relevant policies.

Image 6: Appearance of building fronting West Road

Quality Review Panel (QRP) Comments:

6.2.16 The Quality Review Panel (QRP) report of the review on 22nd January 2025 is attached as Appendix 4. A summary of the Quality Review Panel's comments is provided below:

The QRP commented positively on the principle of the development and stated that the proposal has the potential to create a building of an appropriate quality, but makes recommendations including on massing, architecture, materials, landscape and access. The QRP panel suggested that a clearer distinction between the warehouse and the offices is needed to simplify the overly complex West Road façade, including moving the warehouse element back from the offices, and expressing the different functions more clearly in the façade. The panel further emphasized that more work was needed to develop important

corner elevations. A more varied roof profile could be considered. Furthermore, the panel also encouraged how the buildings should relate and respond to surrounding and forthcoming development. The panel recommended that the window above the main entrance should be reduced in size, and the position of the entrance reassessed. More design work was needed to ensure the ground floor experience showcases public functions, with larger windows and more design detail. Signage should be designed into the façade. Materials should be simplified, with brick potentially framing entrances and larger areas of timber. The panel also stated that cladding appears too dark, and a lighter shade was recommended, and the appearance of weathered timber should be tested. Additionally, the panel advised that adjustments to the building line should be considered to create a more generous pavement space. All opportunities should be taken to green the site, with climate resilient planting. The panel further advised that discussions should be held with officers on how extra street trees could be planted as part of the scheme. Also, the panel stated that the area around the rear entrance should be more pedestrian and cyclist friendly, with planting, and trees in the yard area. The steps should be removed from the front entrance to provide equitable access, and tests were considered to be needed to ensure the vehicle entrance would be safe for pedestrians.

6.2.17 Detailed QRP comments from the recent review together with the officer comments are set out below in Table 1.

TABLE 1

Panel Comment	Officer Responses
The panel stated that the proposals include a number of positive strategic decisions. These include using a high proportion of the site; designing the building with an office fronting onto the street; avoiding palisade fencing; and the design of vehicle access route to the yard at the rear. However, it thinks aspects of the proposals should be improved to ensure the building achieves the high level of design quality required.	QRP comments noted. In response the office building was amended and would now front West Road. The Southern boundary remains as concrete panelled fence. To the north and west boundaries a new 2.4m weld mesh fence would be installed. No fencing to West Road apart from the new gates.
The panel considered that the junction between the warehouse and offices was uncomfortable, and that the two should parts of the building should be distinguished more clearly from one	QRP comments noted. The elevation to West Road has been revised following the comments received. Timber cladding has been continued across the whole of the elevation to

another. The warehouse could be moved back a couple of metres from West Road, so its massing appears subservient to that of the office building.	provide a consistent street scene. Vertical windows to the main entrance area would break up the massing vertically, along with increased window lengths to the warehouse windows.
The panel also stated that the design of the main façade fronting onto West Road was overly complicated and should be simplified. It asked the design team to consider how architecture could achieve this by expressing the building's two different functions more clearly. Architectural treatment could follow the building form more closely, fully representing the warehouse space in the West Road frontage, potentially using the entrance as a vertical strip to separate it visually from the offices.	QRP comments noted. The West Road elevation has been revised to simplify the material palette as requested. The timber cladding has been spread across the whole elevation, enhancing the street scene with vertical windows to the warehouse and horizontal windows to the offices, differentiating the separate parts of the building.
The building would also benefit from more thinking on how to express the corner elevations. Corners are important in views along West Road, and more design development is needed to consider how they will appear, and ensure they make a positive contribution to the street.	QRP comments noted. The northern and southern elevations to the corners of West Road have been enhanced following comments received. Corner windows have been added to the office areas and a vertical window to warehouse elevation has been incorporated, along with timber cladding wrapping the corner.
The panel also noted that the character study of surrounding buildings reveals a range of different roof profiles. The design team has chosen a continuous flat roof. This decision could be revisited to add extra character and interest to the building with a more distinctive design.	QRP comments noted. The proposed building has a hipped roof to the warehouse area with parapet, green roof to the office area again with parapet giving a consistent level across the whole façade.
The panel asks for thinking on how the new building will appear as part of the streetscape. Designs should be developed in the context of the surrounding buildings and should respond to the new buildings under	QRP comments noted. The elevations have been revised to simplify the material palette, to ensure a high-quality elevation is achieved. The elevational treatment of previous Goya schemes was well received in the

construction opposite, so they read well together.	Design Review meeting (as noted within the response received), office ribbon windows have been incorporated into the design as well as the Goya trademark timber cladding. Brickwork to the lower half of the frontage will reflect the materials used on the recently completed buildings on the corner of Dysons Road as well as within the immediate area.
The panel suggests that the large central window above the main West Road entrance seems overpowering, because it is much larger than pedestrian scale. It encouraged the design team to break down the scale of the entrance, potentially being located on the corner of the building instead.	QRP comments noted. The scale of the main entrance glazing has been reviewed and reduced accordingly, to reflect comments received. The vertical glazed panel would separate the different spaces within the building and give a clear indication of the primary access.
The panel recommends putting more investment into design detail on the main façade at ground floor level, as this will be the part of the building most people interact with. The office windows seem small and could be increased in size. More texture could be introduced through design detail at ground floor level, with a simpler above higher up the building.	QRP comments noted. The small individual windows have been amended to become ribbon windows, following the design language above to the offices.
If the ground floor could be a showroom, the façade treatment should reflect this potential use. The treatment could be closer to the entrance windows, offering more to the street than the current domestic-sized windows, which also complicates the architecture by introducing an additional style.	QRP comments noted. As above ribbon window have now been included in the ground floor office area to allow for a more active frontage.
The panel recommends designing space signage into the treatment of the main elevation, to provide more control over how it is delivered when tenants move in.	QRP comments noted. Signage zones have been shown to the West Road frontage as well and the northern elevation, to ensure clear wayfinding to the development
The use of four different materials compares unfavorably with previous industrial buildings commissioned by Goya Developments using fewer materials, which are simpler and more successful. As part of simplifying the main	QRP comments noted. Material palette to the West Road elevation has been simplified in line with comments received. Timber cladding has been shown to the higher levels and brickwork below; the elevation is then broken

façade, the panel asks for thinking on how the material approach can be simplified by reducing the number of different materials.	up with horizontal and vertical window elements to reduce massing.
The use of timber in small strips is also less successful than previous buildings which have incorporated larger timber areas. Smaller areas appear more residential than industrial.	QRP comments noted. The amount of timber being used on the main elevation has been reviewed along with simplifying the palette, timber has now been shown across the whole frontage at the higher level to enhance the elevation.
The panel likes the use of brickwork as a London specific design reference, which also provides robust protection around the vehicle entrance. Opportunities should be examined to use brickwork more extensively to frame entrances, for example the vehicle entrance.	QRP comments noted. The amount of brickwork has been increased to include the whole of the lower level to the West Road elevation. Three landscape planters have been incorporated along the back of the pavement to enhance the street experience with seating incorporated.
The panel suggests that RAL 7016 cladding is too dark a shade of grey. Silver cladding could be considered instead, which would help the brickwork to stand out more.	QRP comments noted. Palette to the front elevation has been simplified and the anthracite cladding has now been omitted, cladding to the bulk of the warehouse to the rear would now be metallic silver.
The panel also asks for more information to be provided to officers showing how timber has weathered in previous buildings, to help them understand how its colour will sit alongside the cladding as part of a coherent palette.	QRP comments noted. Examples of timber cladding used on previous Goyal schemes have been included with the Design & Access Statement to illustrate how the material has performed over the years.
The existing building is set back from West Road, as are other buildings on the street. The proposals place the new building closer to the pavement, making it a more prominent feature in the streetscape and reducing space for pedestrians. The panel asks for thinking on how the position of the building can be adjusted to a create more generous pavement space – without necessarily removing the proposed planting, which is welcome. This will be particularly important to accommodate match day foot traffic to the Tottenham Hotspur Stadium.	QRP comments noted. The proposed building has been pushed back from the pavement following comments, increasing this area along West Road. The existing building on site has loading areas and parking to the front, this gives the perception of a much wider pavement area, the proposed footpath area shown is consistent with the connecting pavements either side to the north and south. The planter to the West Road frontage has been retained, along with the incorporation of seating, plus level access to the main entrance

The panel welcomes the proposed green roof but asks for more work to develop landscape proposals. It thinks the current proposals are too limited given the size of the site, which provides extensive opportunities for greening. It encourages further thinking on what can be done to maximised greenery.	QRP comments noted. The whole of the office area flat roof area has been shown as a planted green roof. The green roof specification has been enhanced further to include biodiversity features.
Planting should be carefully selected to ensure it is climate resilient, and drought-proof.	QRP comments noted. Planting has been revised to the extensive green roof area.
Opportunities include more street greening. Planting more large trees in addition to retaining the existing street trees would be particularly beneficial. The panel encourages discussions with officers on how street trees could be delivered and coordinated with the trees planned as part of the development opposite.	QRP comments noted. Some tree planting has been incorporated along West Road and more street trees would be secured via s106 contribution.
The panel thinks the area outside the rear entrance should be designed as a more pedestrian and cycle-friendly space. A buffer of planting could be used to differentiate it from the parking area.	QRP comments noted. The parking area and rear access has been revised with the incorporation of additional tree planning between the parking and yard areas.
The panel consider that the rear entrance could be more generous, with a larger, less domestic door more in keeping with the front door.	QRP comments noted. Entrance area and fenestration to the rear have been revised, with full height glazing to reflect the front entrance.
There is also scope to plant trees in the rear yard area, helping to provide views of greenery for offices in the building to both front and back.	QRP comments noted. Additional tree planting is proposed between the parking area and yard to form a clear buffer.
The panel emphasises the importance of ensuring equitable access to the building. The steps leading to the main entrance should be removed to ensure level access to the main entrance.	QRP comments noted. The steps in the main entrance have been removed and a ramp incorporated to improve accessibility. Accessible parking is proposed to be located to the rear with level access into the building.
It is important to ensure there is enough intervisibility between pedestrians and vehicles to ensure the entrance to the service yard is safe. Designs should be tested, and	QRP comments noted. The building has been set back from the pavement to ensure visibility for pedestrians crossing the vehicle access and ensuring vehicles can safely egress.

adjustments made if needed, to minimise the risk where vehicles cross the pavement.	

6.3 Impact on amenity of neighboring properties

6.3.1 London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, and states that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing. London Plan Policy D14 requires development proposals to reduce, manage and mitigate noise impacts.

6.3.2 Development proposals should ensure a high standard of privacy and amenity for a development's users and neighbours, in accordance with DPD Policy DM1. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land. An appropriate amount of privacy should be provided to neighbouring properties by avoiding overlooking.

6.3.3 There are no residential properties within nearby proximity of this application site, therefore it is considered that there is no impact on residential amenity in terms of light, privacy, aspect and overshadowing.

<u>Other amenity considerations</u>

6.3.4 Policy DM23 of the DM DPD states that new developments should not have a detrimental impact on air quality, noise or light pollution. DPD Policy DM1 requires proposals to address issues of vibration, noise, fumes and odour.

6.3.5 The submitted Air Assessment (AQA), demonstrates that mitigation measures would be put in place to ensure the development is air quality neutral.

6.3.6 A Noise Impact Assessment has been provided in support of this application. The report identified that the nearest residential noise sensitive receptors (NSRs) to the site are dwellings located on Thornley Close and Perryman House, approximately 67 metres away. To the south of the site, are dwellings located on Burns Court/West Road which are approximately 80 metres away and dwellings located on Willoughby Lane, are approximately 145 metres. Given the separation distances from these properties, it is considered that the proposed development would not have significant impact on the amenities of occupants of these residential properties.

6.3.7 The proposed development will operate on a 24-hour basis and would generate Large Goods Vehicle (LGV) and Heavy Good Vehicle (HGV) movements in the yard space. As the yard space will be located away from the main road, the building will assist in screening noise emitted by the vehicle movements. The submitted Noise Impact Assessment (NIA) concludes that there is no increase in road traffic noise as a result of the proposed development and that the combined noise rating level of plant noise, break-out noise and delivery noise does not exceed the background noise levels during the daytime and night time periods. The Noise Impact Assessment has determined that the noise generated by the proposed development would have a 'low impact' (as set out in BS4142 Technical Note) on the closest Noise Sensitive receptor (NSR). The noise

officer has advised that this is acceptable subject to a Noise Management Plan condition being attached to manage the noise on site.

6.3.8 Any dust and noise relating to demolition and construction works would be a temporary impact, which would typically primarily be controlled by non-planning legislation. This will mitigate the concerns of existing residents when it comes to noise and dust pollution during the construction phases. Nevertheless, the demolition and construction methodology for development would be controlled by condition.

6.3.9 Therefore, it is considered that the proposal would not have a material impact on the amenity of residents and occupiers of neighbouring and surrounding commercial/residential properties.

6.4 Parking and highway safety

6.4.1 London Plan Policy T4 explains that proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. In terms of cycling, London Plan Policy T5 requires developments to provide appropriate levels of cycle parking, which should be fit for purpose, secure and well located. Cycle parking should be provided in accordance with the minimum standards in Table 10.2 of the London Plan. London Plan Policy T6 sets out that car parking should be restricted in line with the levels of existing and future public transport accessibility and connectivity. Developments should be designed to provide the minimum necessary parking. The car parking standards that should apply to this proposal are outlined in Table T6.2 of the London Plan (maximum standards). The standards for non-residential accessible parking are identified in Table 10.6 of the London Plan.

6.4.2 Local Plan (2017) Policy SP7 'Transport' states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This is supported by DM Policy (2017) DM31 'Sustainable Transport'.

6.4.3 The site has a PTAL rating of 2, considered 'poor' access to public transport services. The site is also located within the Tottenham Event Day CPZ, which operates on match and event days and evenings at the Tottenham Hotspur Stadium. Therefore, most of the time, there are no active CPZ restrictions/measures in place.

Access

6.4.4 The Transportation Assessment (TA) states that access to the site will be retained from a single (and widened) point of access from West Road at the northeast corner of the site. The other existing crossovers along West Road would be closed and returned to footway.

Trip Generation

6.4.5 A Transport Assessment (TA) has been submitted in support of the application and has been reviewed by the Council's Transportation Officers. The submitted TA states that in order to undertake an assessment of the trips associated with the proposal, the TRICs database has been used. Two sites were used to determine possible generated trips rates and the data was further broken down into use classes to assess the daily two-way vehicle trips. The report states that the proposed site would generate in the order of 10 - 25 two-way vehicle movements during the AM peak hour of 0800-1900. A further 8 - 28 two-way vehicle movements would be generated during the PM peak hour of 1700-1800. Over the day the site is likely to generate 85 – 121 inbound and 91 - 104 outbound vehicle movements. The report further states that the redevelopment proposals will result in changes of between -19 to +1 additional vehicle movements during the peak hours. Over the day the proposals could result in a reduction of 38 two-way movements or a negligible increase of 8 two-way movements. Overall, the data indicates that whatever use class is implemented it has the potential to create a higher number of vehicle trips than public transport as seen from the modal split data. This uplift in trips is acknowledged. The Council's Transportation Officers have raised no objections to the trip generation, noting that that the increase in trips would not impact the public highway or public transport capacities and networks.

Travel Plan

6.4.6 A draft Travel Plan has been submitted with the application, which details the modes of travel by employees from the development and how it would be managed. To ensure sustainable travel to the site is confirmed, a Travel Plan would be secured via a s106 Legal Agreement and including a Travel Plan Monitoring Fee. Subject to this, it is considered that the development would suitably support sustainable transport.

Car Parking

6.4.7 The Transport Assessment (TA) states that there is no designated formal car parking provision associated with the existing use. The TA also states that 18 car parking spaces would be provided including 2 accessible parking spaces and 2 shared bays, a total of 22 spaces. The proposal would also include 4 electrical charging bays. London Plan Policy T6.2 states that industrial sites such as this should be assessed on a case-by-case basis. The policy further states that the starting point for commuter parking be determined with number standards laid out in Table 10.4 of Policy T6.2 and based on this table, the development's parking requirement would be 60 spaces. The proposed development would provide a total of 18 bays which would be significantly below 60 and considered to be a shortfall given the employment density is based upon uses could be between 115-211 employees for classes Eg (iii)/B1c, B2 and B8.

6.4.8 However, the applicant has stated in their submitted Transportation Technical Note that the provision aligns with the neighbouring site, 18 West Road, which at the time of determination was raised as a possible overprovision of spaces. The possibility of the site close by having a slight overprovision was mitigated by a contribution towards CPZ and associated enforcement support. This provision, and the subsequent transportation officer's assessment of the approved scheme at no. 18 West Road, has influenced what

is considered to be an acceptable arrangement for this proposal. The applicant has further pointed out that the parking survey recently conducted for the scheme approved at 18 West Road demonstrated that there is spare capacity in the area. Furthermore, a contribution towards parking management was secured via s106 on 18 West Road which would tackle the historical issues of illegal parking on Brantwood Road and West Road. Therefore, it is considered that parking restrictions will be put in place and as such, any future site workers will not be able to park on the street regardless of whether there is current spare capacity.

6.4.9 The Council's Transportation Officers have highlighted that to address concerns raised a parking management plan condition would be attached for the site's wider car parking provision including the 2 disabled bays and 2 shared spaces to understand how parking will be allocated and reviewed in line with a Travel Plan. Furthermore, for the site to be fully compliant with policy the applicant/developer will be required to enter into a s106 agreement for a contribution towards additional parking restrictions in the form of changes to the existing CPZ proposal from an event day only CPZ to an all week CPZ within the surrounding streets. The Council's Transportation Officer considers that subject to conditions/financial contribution via s106, the parking provision is considered acceptable and in accordance with London Plan Policy T6.

Electric Vehicle charging points

6.4.10 The applicant's Transport Statement states that the proposed development would be to provide 2 dual charging points to support 4 spaces within the car parking area. These would be located conveniently close to the building entrances. The Council Transportation Officers note that to ensure that the site is supporting future zero emission travel to the site by employees, the Council will require that the remaining spaces to have capacity built in from the offset for passive electric charging points. Although, it is not known whether the remaining spaces would be installed for passive provision for future charging capabilities. The Council's Transportation Officers consider that a pre-commencement condition should be attached, requiring a detailed plan, provision of 4 car parking spaces and 18 passive vehicle charging points.

Cycle Parking

6.4.11 The London Plan 2021 Policy T5 requires that developments 'provide the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located and be in accordance with the minimum standards. The proposed development would see the provision of 12 long-stay and 6 short-stay cycle spaces. With regards to policy requirements the developer has utilised B2-B8 cycle parking standards which requires the following numbers: 1 space per 500 sqm (GEA) for long-stay and 1 space per 1000 sqm (GEA) for short-stay. This means the developer would need to provide 12 long-stay and 6 short-stay. The Council's Transportation Officer advises that the proposed provision is in accordance with this policy which is supported by officers. Details relating to the cycle parking will be secured by a pre-commencement planning condition requiring the applicant to submit details of cycle parking spaces in line with the London Plan 2021 Policy T5 Cycle and Transport for London's London Cycle Design

Standards (LCDS) which must be submitted and approved before development commences on-site.

Service and delivery

6.4.12 The TA states that the existing site has five separate points of access onto West Road. Vehicle access is currently provided from West Road with an existing bellmouth access at the northern boundary of the site. This access provides a route towards the rear of the building providing access to a servicing area along with some informal car parking. A loading bay is located at the southeast corner which provides direct servicing from West Road. This access requires vehicles to either wait on West Road or reverse from West Road into the loading area.

6.4.13 A draft Service and Delivery Plan has been submitted with the application. The report states 6 loading docks would be provided to serve 16.5m Heavy Good Vehicle (HGVs), All delivery and servicing are proposed to take place within the yard area and The Council Transportation Officer notes that this is a significant improvement compared to the existing. The Council Transportation Officer notes that no exact routing has been provided or proposed as part of the application for HGVs. However, the site is within proximity to the strategic road network, which gives the site the unique opportunity for deliveries not to take place via residential streets and in addition, this detail would be secured, by condition, as part of a final Service and Delivery Plan.

6.4.14 The plans submitted indicate that space has been created for cargo bikes, however, the transportation officers have highlighted that it's unclear how this will be implemented based on the design. Any future Servicing and Delivery plan will need to set out how deliveries via cargo bikes can be integrated successfully to reduce the use of larger vehicle types and push sites use of sustainable forms of travel. Details would be secured via condition.

6.4.15 A Swept Path Analysis (SPA) of the proposed site access and internal site layout has been undertaken which confirms that articulated vehicles measuring up to 16.5m have been tracked both internally and from the site access onto the external road network. The detailed swept paths have been included in the Service & Delivery Plan which demonstrates how 16.5m HGVs would be able to reverse into a loading bay and leave in a forward gear. Such movements are considered appropriate and would allow the free flow of delivery and service vehicles into, through and out of, the site. The swept path analysis provided by the applicant is acceptable.

Highways Works

6.4.16 The site currently has many vehicle crossovers, drop kerbs and off-street loadings bays that have historically been there for some time. The Council's Transportation Officer notes that the following highway works would be required:

- Removal of many vehicle crossovers
- Drop kerbs

- Off-street loading bays
- New gated vehicle access
- Reinstatement of the footway
- Extension of existing on-street parking bays
- Establishment of Road markings for parking restrictions
- Stage 1 & 2 safety audit

6.4.17 Given the proposal includes the construction of a new vehicle access, a Road Safety Audit Stage 1 should have been conducted and submitted with the application. The Council's Transportation Officer advises that any modification to the public highways will require the applicant to engage in discussion with the Highways department, including over the location of the planters and benches. The landscaping plans submitted indicate several trees being planted onto the footway along West Road and the placement of new trees on the adopted highway will require consultation with Highways Department and surveys of the footways would be required. As such, The Council Transportation Officer have advised that a stage 1 and 2 Road Safety Audit should be completed during the design stage of any s.278 works. These works would be subject to further detailed design/approval and will be secured as part of a s.278 agreement.

Construction and logistics

6.4.18 The applicant has submitted a draft Construction Logistic Plan (CLP) which has been reviewed by Transportation Officers who have advised that a detailed CLP will be required for review and approval prior to commencement of any site works. The draft CLP is acceptable subject to a detailed CLP being submitted by the developer/applicant and this would be secured via a s106 obligation, and the applicant will be required to pay a construction travel plan contribution to be secured via s106.

6.4.19 Subject to the conditions and obligations as indicated, officers consider that the proposed scheme would not have any undue impact on the road network, and through the inclusion of cycle parking, would encourage the uptake of sustainable modes of transport.

Image 7: Rear of building showing service yard

6.5 Energy and Climate Change

6.5.1 The NPPF requires development to contribute to the transition to a low carbon future and to reduce energy consumption. London Plan Policy SI2 states that major developments should be zero carbon, and in meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Local Plan Policy SP4 requires all new developments to be zero carbon and to introduce measures that reduce energy use and carbon emissions. Local Plan Policy SP11 requires all developments to adopt sustainable design and construction techniques to minimise impacts on climate change and natural resources.

Carbon Reduction

6.5.2 The applicant has submitted an Energy & Sustainability Statement, which was reviewed by the Climate Change Officer. The development achieves a reduction of 111% carbon dioxide emissions on site, which is supported in principle. The reports states that the applicant has reviewed the installation of various renewable technologies and concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 19.2 tCO2 (96%) reduction of emissions are proposed under Be Green measures. The development is also proposing a living roofs and these are supported in principles subject to detailed design and a condition would be attached for details for living roofs to be submitted. Overall, the Climate Change Officer raises no objections to the proposal subject to some clarifications with regard to the energy and overheating strategies which can be dealt with via condition.

BREEAM

6.5.3 The applicant has prepared a BREEAM Pre-Assessment Report for the development. Based on this report, a score of 79.64 % is expected to be achieved, equivalent to 'Excellent' rating. If all potential credits were achieved, a further score of 7.57% can be added and a total of 87.21% can be achieved potentially, equivalent to 'Outstanding' rating. This is supported by the Climate Change Officer subject to a condition.

Overheating

6.5.4 In terms of overheating, the applicant has submitted a revised report, which has been reviewed by the Climate Change Officer. Officers note that the revised report indicates that the revised overheating modelling has included circulation/entrance spaces and shows that proposed development has passed all the criteria. A condition would be attached to secure overheating mitigation measures.

Decentralised Energy Network (DEN)

6.5.5 The development is within approximately 554m of a planned future "Energetik Extension" network. The Applicant has submitted evidence of discussions with Energetik, confirming that the predicted demands are too low to economically warrant a future DEN connection.

6.5.6 However, the applicant has confirmed the site will be future proofed to facilitate a connection if an incoming future tenant has a suitable heating energy demand. A site plan has been submitted showing an indicative future connection point, location of pipe between the connection point and plant room. The details would be secured via a condition.

6.5.7 The proposal satisfies development plan policies and the Council's Climate Change Officer supports this application subject to conditions. As such, the application is considered acceptable in terms of its sustainability.

6.6 Urban Greening, Trees and Ecology /Biodiversity

6.6.1 Policy G5 of The London Plan 2021 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design. The policy states that non-residential development should meet an urban greening factor target of 0.3 but states that whilst B2 and B8 uses are excluded from the 0.3 target, such development is still expected to set out what measures they have taken to achieve urban greening on-site.

6.6.2 Local Plan Policy SP11 promotes high quality landscaping on and off-site and Policy SP13 seeks to protect and improve open space and providing opportunities for biodiversity and nature conservation.

6.6.3 Policy DM1 of the DM DPD requires proposals to demonstrate how landscape and planting are integrated into development and expects development proposals to respond to trees on or close to a site. Policy DM21 of the DM DPD expects proposals to maximise opportunities to enhance biodiversity on-site.

6.6.4 London Plan Policy G7 requires existing trees of value to be retained, and any removal to be compensated by adequate replacement. This policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals. Policy SP13 of the Local Plan recognises that 'trees' play a significant role in improving environmental conditions and people's quality of life, where the policy in general seeks the protection, management and maintenance of existing trees.

6.6.5 In terms of Urban Greening Factor, the site currently consists of a large section of tarmac and concrete that serves as a car park, access road, and container storage, but it lacks any landscape features. There is a beech tree offsite, located along the eastern border of the property. The proposed development would provide improvements to the soft landscaping compared to the existing arrangement, which provides virtually no greening. The proposal incorporates urban green measures throughout the design, including green sedum roof to boost biodiversity. The landscaping treatment would include the planting of ornamental shrubs, planters and grass to the building frontage. Furthermore, at the rear of the building, the landscape treatment will incorporate ornamental shrubs and trees. In addition, the applicant has agreed to make a financial contribution towards the planting of additional street trees which would be secured via s106 obligation. The applicant's Landscaping and UGF report calculate an Urban Greening Factor for 0.034 which will increase to 0.041, given the additional trees secured via s106. It is considered that UGF would is satisfactory for the proposed B2/B8 use.

6.6.6 The landscaped areas would provide a softer boundary to the development and provide greater opportunities for biodiversity compared to the existing site. Officers consider that the proposal includes good urban greening improvements, which provides an acceptable balance between greening and intensification of B2 and B8 uses, as such, this is considered acceptable in urban greening terms.

Trees

6.6.7 The applicant has submitted an Arboricultural Impact Assessment (AIA) and Tree Survey for the site. The report indicates that no tree work is proposed, however, there is a Hornbeam, (T1), growing on the pavement immediately in front of the site and an Ash, (T2), growing just outside the southern boundary. The report states that both trees would be retained, and a condition will be attached for the trees to be protected. In addition to the existing trees, as stated previously, the applicant has agreed to contribute towards street tree planting, to be secured via s106.

6.6.8 The Council's Tree Officer has been consulted and advises that there is no objection providing a tree protection condition is attached.

Ecology/Biodiversity

6.6.9 Policy G6 of the London Plan requires development proposals to manage impacts on biodiversity and aim to secure net biodiversity gain.

6.6.10 Strategic Policies DPD Policy SP13 requires development to protect and improve biodiversity, including contributing to wildlife and ecological habitats and, where possible, including tree planting, green and brown roofs, rainwater harvesting, green walls, bird and bat boxes.

6.6.11 The applicant reports that the development qualifies for the 'de minimis' exemption from requiring a Biodiversity Net Gain on site. This is because the proposal is sited on an existing built-up industrial site covered by tarmac/concrete hard standing. As such, the development would be exempt as it does not impact on any onsite priority habitat and the current land has a biodiversity value of zero under the statutory biodiversity metric. The development is exempt from biodiversity percentage gain requirement. Therefore, the proposed development complies with the net gain requirement of policy G6 of the London Plan. Officers consider that although the proposed development is exempted from requiring BNG, the planting of trees, planters, ornamental shrubs and sedum green roof is a significant improvement that would encourage BNG on site which is acceptable.

6.7 Flood Risk and drainage

6.7.1 London Plan Policy SI12 states that flood risk should be minimised and Policy SI13 states that development proposals should aim to achieve greenfield run-off rates with water managed as close to source as possible. Local Plan Policy SP5 and Policy DM24 of the DM DPD seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage.

6.7.2 The site is located with Flood Risk Zone 2 (low) as defined by the Environment Agency. As the proposal is for commercial / industrial use, the development is classified as a 'less vulnerable' development by the Flood Risk Vulnerability Classification (Table 2) in the National Planning Policy Framework (NPPF). The applicant has submitted a Flood Risk Assessment and drainage strategy.

6.7.3 The DPD Policy DM24 seeks that All proposals for new development within Flood Zones 2 and 3a will be required to provide sufficient evidence for the Council to assess whether the requirements of the Sequential Test and Exception Test, where required, have been satisfied.'

6.7.4 The applicant has submitted a Flood Risk Assessment and Drainage Strategy report. These have been reviewed by the LBH Flood & Water Management officer who has confirmed that they are generally content with the overall methodology as used and mentioned within in the Flood Risk Assessment and Drainage Strategy Report. Subject to a planning condition being attached to planning permission, officers do not have any objection.

6.7.5 Thames Water raises no objection with regards to water network and water treatment infrastructure. Thames Water recommends a condition regarding piling and an informative regarding groundwater discharge and water pressure.

6.7.6 Accordingly, the proposed development is considered to comply with local drainage policies.

6.8 Air Quality and Contamination

6.8.1 Policy SI1 of the London Plan states that development proposals should be air quality neutral. Policy DM23 states that developments should not have a detrimental impact on air quality, noise or light pollution.

6.8.2 The applicant has submitted an Air Quality Assessment. The report sets out that the air pollutant concentration modelling has identified that there will be negligible decrease in nitrogen dioxide and no increase in particulate matter concentrations at existing sensitive receptors as a result of the development scheme. There are no existing sensitive locations which will exceed the Air Quality Objectives (AQO), as a result of the proposed development. Therefore, the air quality impacts of the proposed development scheme is in accordance with the NPPF and are considered to be acceptable, therefore mitigation is not required. The applicant has also submitted an Air Quality Neutral Assessment' which states that the traffic consultant has identified that the proposed development will result in there being a decrease of 50 vehicle movements per day onto the local road network when compared to the site's current use. Accordingly, there is no requirement to undertake a transport emissions assessment. The report further goes on to state that there will be no increase in transport or building emissions associated with the proposed development and therefore no mitigation is required, and the development can be considered 'Air Quality Neutral'. The Carbon Management/Pollution Team has been consulted and raise no objection, subject to conditions.

Land Contamination

6.8.3 Local Plan Policy DM23 requires development proposals on potentially contaminated land to follow a risk management-based protocol to ensure contamination is properly addressed and to carry out investigations to remove or mitigate any risks to local receptors.

6.8.4 The Pollution Officer has been consulted as part of the application and has raised no objections, subject to further investigations being made at the construction stage and this is to be secured by way of the imposition of conditions on any grant of planning consent.

6.9 Waste and Recycling

6.9.1 London Plan Policy SI5 indicates the Mayor is committed to reducing waste and facilitating a step change in the way in which waste is managed. Local Plan Policy SP6

Waste and Recycling and DPD Policy DM4 require development proposals to make adequate provision for waste and recycling storage and collection.

6.9.2 As this is a commercial building refuse collection would be dealt with through a private arrangement. A condition to secure details of the location and facility for waste and recycling facilities on site is recommended.

6.10 Employment and Training

6.10.1 Local Plan Policies SP8 and SP9 aim to support local employment and facilitate training opportunities. The Planning Obligations SPD also requires the developer (and its contractors and sub-contractors) to notify the Council of job vacancies, and to employ a minimum of 20% of the on-site workforce from local residents (including trainees nominated by the Council). Furthermore, the developer would be required to provide support towards recruitment costs for apprenticeships and one full-time apprenticeship per development. All these requirements would be secured by a S106 legal agreement.

6.10.2 The applicant has indicated that the development would provide 6,044 sqm of employment floor space for flexible E, B2 and B8 use. The proposed redevelopment of the site would potentially increase the number of jobs from 15 to 211 full-time equivalent (FTE) jobs, which is a significant net gain. The Inclusive Economy Team was consulted and support the proposal as it seeks to intensify the employment space and further note that the proposal is consistent with 'Haringey's Workspace Planning Design Guidance'. However, officers wanted clarity on the intended use of the employment space and in response the applicant has stated that this is a speculative employment scheme for flexible B2, B8 and E(g)(iii) uses as such, the end users are not yet known at this stage. This is considered common with speculative developments and therefore acceptable.

6.10.3 An employment skills and training plan, which is recommended to be secured by a s106 planning obligation, would ensure a target percentage of local labour is utilised during construction and a financial contribution towards apprenticeships. This would benefit priority groups that have trouble in accessing employment. As such, the development is acceptable in terms of employment provision.

6.11 Fire Safety

6.11.1 Policy D12 of the London Plan states that all development proposals must achieve the highest standards of fire safety. To this effect major development proposals must be supported by a fire statement.

6.11.2 The applicant has provided a Fire Strategy in support of this application. This document includes means of warning and escape, internal fire spread considerations, external fire spread considerations and access and facilities for the fire and rescue service. The report outlines that the building is designed in accordance with the recommendations of Approved Document B Volume 2. Subject to adherence with measures in accordance with Approved Document B Volume 2, it is considered that the development would be

acceptable in respect of fire safety. It is considered that the applicant has provided a Fire Statement in accordance with Policy D12.

7.0 CONCLUSION

- There is strong policy support for the provision of employment space and the intensification of industrial uses in this area, which forms part of a Strategic Industrial Location (SIL). The scheme would deliver high quality commercial space; an increased density of employment uses and new jobs. These outcomes comply with the relevant planning policies and align with the Council's wider economic strategy for the Borough.

- The proposed scale and design of the development is appropriate within the context of the site would be of good quality and have a positive impact on the visual appearance of the area. The scale of the development would complement the locality, whilst making best use of the available land. The materiality, form and detailing of the scheme would be reflective of the industrial setting and would also result in an appropriately distinctive appearance for the development. Overall, the scheme would improve on the appearance of the site and make a positive visual contribution to the wider locality.

- The development would provide a sufficient number of appropriately located car and cycle parking spaces, would encourage sustainable transport initiatives and include appropriate mitigation measures to minimise impacts upon the public highway.

- Officers are also satisfied that the proposal represents sustainable development and complies with policy objectives regarding employment, impact upon amenity, transport and travel, energy and sustainability, landscaping, biodiversity flood risk and air quality. Officers have recommended conditions, and s106 heads of terms, where necessary to make the scheme acceptable in planning terms.

8.0 COMMUNITY INFRASTRUCTURE LEVY (CIL)

Based on the information given on the plans, the Mayoral CIL charge will be £16,336.48 (229.8 sqm x £71.09) but there will be no Haringey CIL charge as this would not be within the chargeable use classes. The Mayoral CIL will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index.

9.0 RECOMMENDATION

GRANT PERMISSION subject to conditions subject to conditions in Appendix 1 and subject to sec. 106 Legal Agreement.

APPENDIX 1 - CONDITIONS

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

   Reason: This condition is imposed by virtue of Section 91 of the Town and Country Planning Act 1990 and to prevent the accumulation of unimplemented planning permissions.

2. The development hereby authorised shall be carried out in accordance with the following approved plans and specifications:
   11669_PL211 Existing Elevations
   11669_PL201 Location Plan
   11669_PL209A Proposed Roof Plan
   11669_PL208A Proposed Elevations 1 of 2
   11669_PL207A Proposed Elevations 2 of 2
   11669_PL203 Block Site Plan
   11669_PL206 Proposed Second Floor Plan
   11669_PL205 Proposed First Floor Plan
   11669_PL210A Proposed Landscape GA
   Documents and Reports:
   2025.03.12 Cert B Highways letter
   Whole life Carbon Assessment
   Circular Economy
   Geo-Environmental Phase 1_Part1 – Part 4
   Healthy Streets Transport Assessment
   Fire Statement
   11669_Design and Access Statement Rev 0
   Planning Statement
   Arboricultural Impact Assessment
   BREEAM Pre-Assessment
   Urban Greening Factor Plan
   Noise Impact Assessment
   Drawing schedule: 37 – 39 West Road, Tottenham 03.07.2025
   External Lighting Assessment
   Energy Statement
   Travel Plan
   Delivery and Servicing Plan
   Construction Logistics Plan
   11669 Operational Waste Management Plan
   11669 Site Waste Management Strategy
   Air Quality Assessment
   Air Quality Neutral Assessment
   Construction Dust Assessment

Flood Risk Assessment
Geo-Environmental Phase 1 Covering Note
Security Needs Assessment
Ecological Impact Assessment
17142 R02 Bat Survey Report AJ 28052
17142 R03 CEMP MJ 28052

Reason: Reason: For the avoidance of doubt and in the interests of proper planning.

Materials

3. Samples of materials to be used for the external surfaces, rainwater good hardstanding, gates and fencing, of the development shall be submitted to, and approved in writing by, the Local Planning Authority before any above ground development is commenced. Samples shall include sample panels or brick types, cladding, window frames, boundary fence and a roofing material sample combined with a schedule of the exact product references. The development shall be provided as approved and retained as such thereafter.

   Reason: In order for the Local Planning Authority to retain control over the exact materials to be used for the proposed development and to assess the suitability of the samples submitted in the interests of visual amenity consistent with Policy D4 of the London Plan 2021, Policy SP11 of the Haringey Local Plan 2017 and Policy DM1 of The Development Management DPD 2017.

Land Contamination

4. Before development commences other than for investigative work and where remediation of contamination on the site is required, completion of the remediation detailed in the approved method statement shall be carried out and a report that provides verification that the required works have been carried out shall be submitted to and approved in writing by the Local Planning Authority before the development is occupied.

   Reason: To ensure that the development is not put at unacceptable risk from, or adversely affected by unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.

Unexpected Contamination

5. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing, in advance, with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.

6. **Demolition/Construction Environmental Management Plans (PRE-COMMENCEMENT)**

a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority
b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.

The following applies to both Parts a and b above:

The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:

i. A demolition and construction method statement which identifies the stages and details how works will be undertaken;
ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;

iii. Details of plant and machinery to be used during demolition/construction works;
iv. Details of an Unexploded Ordnance Survey;
v. Details of the waste management strategy;
vi. Details of community engagement arrangements;
vii. Details of any acoustic hoarding;
viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);
ix. Details of external lighting; and,
x. Details of any other standard environmental management and control measures to be implemented.
d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:
i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;
ii. Details confirming the plot has been registered at http://nrmm.london;
iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;

iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);
v. A Dust Risk Assessment for the works; and
vi. Lorry Parking, in joint arrangement where appropriate.

The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration shall be submitted to the Local Planning Authority, for its written approval, prior to any demolition/construction works being carried out.

Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality, in accordance with Policies T4, T7, SI1 and D14 of the London Plan 2021, Policies SP0 of the Haringey Local Plan 2017 and with Policy DM1 of The Development Management DPD 2017

Demolition and Construction Management Plan (including demolition and construction logistics plan)

7. Prior to the commencement of development, a Demolition and Construction Management Plan (including a Demolition and Construction Logistics Plan) shall be submitted to and approved in writing by the Local Planning Authority. The document shall include the following matters and the development shall be undertaken in accordance with the details as approved:
a)The routing of excavation and demolition and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway;
b)The estimated peak number and type of vehicles per day and week;
c)Estimates for the number and type of parking suspensions that will be required; and
d)Details of measures to protect pedestrians and other highway users from demolition and construction activities on the highway.

Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development, encouraging modal shift and reducing overall vehicle numbers; to give the Council an overview of the expected logistics activity during the construction programme; and to protect of the amenity of neighbour properties and to main traffic safety, in accordance with Policies T4, T7 and D14 of the London Plan 2021, Policies SP0 of the Haringey Local Plan 2017 and with Policy DM1 of The Development Management DPD 2017.

Restrictive uses classes

8. Notwithstanding the provisions of the Town & Country Planning (Use Classes) Order 1987 (as amended), or any provision equivalent to that Class in any

statutory instrument revoking and re-enacting that Order, the premises shall be restricted to use classes Office/Light Industrial E (g))iii; industrial (Use Class B2); and/or storage and distribution (Use Class B8) purposes only and shall not be used for any other purpose including any purpose within Class B

Reason: In order to restrict the use of the premises to one compatible with the surrounding area and in interests of neighbouring residential amenity, in accordance with Policies E4 and E5 of the London Plan 2021, Policy SP8 of Haringey Local Plan 2017 and Policies and DM1 and DM37 of the Development Management DPD.

Cycle Parking

9. No development shall take place until plans showing accessible, sheltered, and secure cycle parking for 12 long-stay, 6 short-stay, and 1 cargo cycle stand parking space have been submitted to and approved in writing by the Local Planning Authority. The design must be in line with the London Cycle Design Standard. The development shall take place in accordance with the approved details, and shall be retained as such for the lifetime of the development,

Reason: To promote sustainable modes of transport in accordance with policy T5 of the London Plan 2021, Policy SP7 of the Haringey Local Plan 2017 and London Cycle Design Standards (LCDS).

Drainage

10. No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate:

a)For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method.
b)Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development.
c)An evidence from the Thames Water confirming that the site has an agreed rate and point of discharge.

Reason: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system, in accordance with Policies SI 12 and SI 13 of the London Plan 2021 and Policies DM24 and DM25 of the Development Management DPD.

Secure by design accreditation

11. (a) Prior to the first occupation of the development, a 'Secured by Design' accreditation shall be obtained and thereafter all features are to be permanently

retained in accordance with the accreditation. Accreditation must be achieved according to current and relevant Secured by Design guidelines at the time of above grade works of the development. Confirmation of the certification shall be submitted to and approved in writing by the Local Planning Authority. The development shall only be carried out in accordance with the approved details and retained as such thereafter for the lifetime of the development.

Reason: In the interest of creating safer, sustainable communities, in accordance with Policies D3 and D11 of the London Plan 2021 and Policy DM2 of the Development Management DPD.

Energy Strategy

12. The development hereby approved shall be constructed in accordance with the Energy Statement prepared by Shepherd Brombley Partnership – Issue 2 (dated 25/6/2025) delivering a minimum 111% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 158 kWp solar photovoltaic (PV) array.

(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to, and approved in writing, by the Local Planning Authority. This must include:
- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;
- Confirmation of the necessary fabric efficiencies to achieve a minimum 15% reduction;
- Details to reduce thermal bridging including the projecting window frame details;
- Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;
- Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;
- Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); inverter capacity; and how the energy will be used on-site before exporting to the grid;
- Specification of any additional equipment installed to reduce carbon emissions, if relevant;
- A metering strategy.

The development shall be carried out strictly in accordance with the details so approved prior to first use and shall be maintained and retained for the lifetime of the development.

(b) The solar PV arrays and air source heat pumps must be installed and brought into use prior to first occupation of the development. Six months following the first occupation of the development, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy

generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.

(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.

Overheating

13. Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved in writing by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This assessment shall be based on the Thermal Comfort which was included in Energy Statement prepared by Shepherd Brombley Partnership – Issue 2 (dated 25/06/2025) as a starting point, the revised Overheating Report should demonstrate a reduction in cooling demand.

This report shall include:

- Revised modelling of units modelled based on CIBSE TM52, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;
- Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures;
- Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan; mitigation measures should clearly outline the proposed ventilation strategy including the amount of openable windows and the mechanical ventilation rate;
- Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy prioritising passive measures;
- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.

Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development, including incorporating:

- Natural ventilation provided by openable windows;

- Glazing g-value of 0.36 of better;
- Mechanical ventilation using MVHR with summer bypass;
- Active cooling using ASHP VRF;
- Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.

REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.

Urban Greening Factor

14. Prior to completion of the construction work, an Urban Greening Factor calculation shall be submitted to and approved in writing by the Local Planning Authority demonstrating a target factor which shows an improvement from factor 0.034 as shown on the Urban Greening Factor Plan prepared by Tyler Grange (dated 27/02/2025) through greening measures.

Reason: To ensure that the development provides the maximum provision towards the urban greening of the local environment, creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

BREEAM

15. a) Prior to commencement of development on site, a Design Stage Assessment and evidence that the relevant information has been submitted to the BRE for a design stage accreditation certificate shall be submitted to, and approved in writing by, the Local Planning Authority confirming that the development will achieve a BREEAM 'Excellent' outcome (or equivalent), aiming for 'Outstanding'.

This shall be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.

b)Within 6 months of commencement on site, the Design Stage Accreditation Certificate shall be submitted to, and approved in writing by, the Local Planning Authority. The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.

c)Prior to occupation, the Post-Construction Stage Assessment and tool, and evidence that this has been submitted to the BRE shall be submitted to, and approved in writing, by the Local Planning Authority, confirming that the

development has achieved a BREEAM 'Excellent' outcome (or equivalent), aiming for 'Outstanding', subject to certification by BRE.

d)Within 6 months of occupation, a Post-Construction certificate issued by the Building Research Establishment must be submitted to the local planning authority for approval, confirming this standard has been achieved.

In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for the written approval of the local planning authority with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Planning Authority's approval of the schedule, or the full costs and management fees given to the Local Planning Authority for offsite remedial actions.

Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.

External Lighting

16. Prior to the commencement of above ground works on site full details of all proposed external lighting shall have been submitted to, and approved in writing by, the Local Planning Authority. Details shall include appearance and technical details and specifications, intensity, orientation and screening of lamps, siting and the means of construction and layout of cabling. Lighting is to be restricted to those areas where it is necessary with shielding to minimise obtrusive effects. The approved scheme is to be fully completed prior to use of the development and shall be permanently maintained thereafter.

Reason: To ensure the design, ecological and environmental quality of the development is protected and enhanced and also to safeguard residential amenity in accordance with Policies DM1, DM19 and DM23 of the Development Management Development Plan Document 2017.

Boundary Treatment

17. Above ground works must not commence until details of the proposed boundary treatment, including the proposed 2.4m high weld mesh fence, have been submitted to and approved in writing by the

Local Planning Authority. This shall include the proposed layout, materials and colours for the full site boundary and any internal fencing/gates.

The approved boundary treatment must be implemented in accordance with the approved details prior to use of the development and maintained for the lifetime of the development.

Reason: To ensure that boundary treatment is of a high-quality, and successfully responds to the context of the site, in accordance with Policy D3 of the London Plan 2021 and Policy DM1 of the Development Management DPD.

Plant Noise

18. The design and installation of new items of fixed plant hereby approved by this permission shall be such that, when in operation, the cumulative noise level LAeq 15 min arising from the proposed plant, measured or predicted at 1m from the facade of nearest residential premises shall be a rating level of at least 5dB (A) below the background noise level LAF90. The measurement and/or prediction of the noise should be carried out in accordance with the methodology contained within BS 4142: 1997. Upon request by the local planning authority a noise report shall be produced by a competent person and shall be submitted to and approved in writing by the local planning authority to demonstrate compliance with the above criteria.

Reason: In order to protect the amenities of nearby residential occupiers consistent with Policy D14 of the London Plan 2021 and Policies DM1 and DM23 of The Development Management DPD 2017.

Delivery/Servicing Plan and Waste Management

19. The development shall not be occupied/used until a final Delivery and Servicing Plan (DSP) has been submitted to, and approved in writing by, the Local Planning Authority. The service and delivery plan must also include a waste management plan which includes details of how refuse is to be collected from the site. The plan should be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying distance of a refuse truck on a waste collection day. It shall demonstrate how the development will include the consolidation of deliveries and enable last mile delivery using cargo bikes.

Details shall be provided on how deliveries can take place without impacting on the public highway, the document should be produced in line with TfL guidance. The development shall only be operated in accordance with the Final DSP.

The final DSP must be submitted at least 6 months before the development is occupied/used and must be reviewed annually in line with the travel plan for a period of 3 years unless otherwise agreed in writing in advance by the Local Planning Authority.

Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway and to comply with the TfL's DSP Guidance 2020.

Accessible car parking bays

20. Prior to commencement of development the applicant shall submit plans demonstrating how the two accessible car parking bays will be allocated and utilized. The development shall not be occupied until the two accessible car parking spaces have been provided; and they shall be retained as such for the lifetime of the development. The accessible car parking bays shall only be used in accordance with the approved details.

Reason: To ensure that the development is in accordance with the London Plan 2021 standard T6.5 Non-residential disabled person parking.

Car Parking Design and Management Plan

21. (a) Prior to occupation of the development a Car Parking Design and Management Plan (CPMP) relating to the proposed car parking spaces shall be submitted to and approved in writing by the Local Planning Authority.

(b) The CPMP shall include details of the following:
ii. Location and design of the car parking space(s).
iii. Provision of Electric Vehicle Charging Point(s) (direct provision for the space(s).
iv. Allocation, management and enforcement of the car parking space(s) (prioritising wheelchair users, then other people with disabilities, then others as part of a dynamic strategy to prioritise use and minimise redundancy of the space(s)).

Reason: To manage the on-site car parking provision of the proposed development so that it is used efficiently and only by authorised occupiers, promote sustainable travel and protect the amenity of the site users in accordance with Policies T6 of the London Plan 2021, Policies SP0 of the Haringey Local Plan 2017 and with Policy DM1 of The Development Management DPD 2017.

Electric Vehicle Charging

22. Prior to occupation of the development 2 active dual charging points to support 4 car parking spaces and 18 passive electric vehicle charging points to serve the on-site parking spaces shall be provided.

Reason: to be in accordance with published Haringey Council Development Management DPD, Chapter 5 Transport & Parking and the published London Plan 2021 Policy T6.2 Office Parking.

Hard and soft landscape works

23. Prior to the first occupation of the development, full details of both hard and soft landscape works shall be submitted to, and approved in writing by, the Local Planning Authority, and these works shall thereafter be carried out as approved. Details shall include information regarding, as appropriate:
a) Means of enclosure;
b) Hard landscaping surfacing materials;
c) Planting plans including an assessment of existing and proposed trees;
d) Written specifications (including details of cultivation and other operations associated with plant and/or grass establishment);
e) Schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; and

The approved scheme of planting, seeding or turfing comprised in the approved details of landscaping shall be carried out and implemented in strict accordance with the approved details in the first planting and seeding season following the occupation of the building or the completion of development (whichever is sooner). Any trees or plants, either existing or proposed, which, within a period of five years from the completion of the development die, are removed, become damaged or diseased shall be replaced in the next planting season with a similar size and species. The landscaping scheme, once implemented, is to be retained thereafter.

Reason: In order for the Local Planning Authority to assess the acceptability of any landscaping scheme, thereby ensuring a satisfactory setting for the proposed development in the interests of the visual amenity of the area consistent with Policy DM1 of the Development Management DPD 2017 and Policy SP11 of the Local Plan 2017.

Tree Protection

24. Prior to the commencement of any development hereby approved and before any equipment, machinery or materials are brought onto the site for the purposes of the development hereby approved, a Tree Protection Method Statement incorporating a solid barrier protecting the stem of the trees and hand dug excavations shall be submitted to and approved in writing by the Local Planning Authority. The works shall be carried out as approved and the protection shall be maintained until all equipment, machinery and surplus materials have been removed from the site.

Reason: In order to ensure the safety and well being of the trees adjacent to the site during constructional works that are to remain after works are completed consistent with Policy G7 of the London Plan 2021, Policy SP11 of the Haringey Local Plan 2017 and Policy DM1 of The Development Management DPD 2017.

Living roofs

25. (a) Prior to the above ground commencement of development, details of the living roof shall be submitted to, and approved in writing by, the Local Planning Authority. The Living roof must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:
i) A roof plan identifying where the living roof will be located;
ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm);
iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate
iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m2 of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m2, rope coils, pebble mounds of water trays;
v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m2) and density of plug plants planted (minimum 20/m2 with root ball of plugs 25cm3) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);
vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and
vii) Management and maintenance plan, including frequency of watering arrangements.

(b) Prior to the use of the development evidence shall be submitted to, and approved in writing by, the Local Planning Authority that the living roof has been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roof has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

DEN Connection

26. Prior to the above ground commencement of construction work, details relating to the future connection to the DEN shall be submitted to, and approved in writing by, the local planning authority. This shall include:

- A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the development. The drawings shall cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;
- Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;
- Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;
- Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;
- Details of a future pipework route from the temporary boiler location to the plant room.

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.

Management and Control of dust

27. No demolition or construction works shall be carried out on the site until the specific locations of PM10 dust monitors and how these results will be made available for ongoing assessment has been submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details thereafter.

Reasons: To Comply with Policy 7.14 of the London Plan and GLA SPG Dust and Emissions Control (2014).

Considerate Construction Scheme

28. Prior to the commencement of any demolition or construction works on site the Contractor Company shall register with the Considerate Constructors Scheme. Proof of registration shall be submitted to, and approved in writing by, the Local Planning Authority in advance of the works taking place. Registration shall be maintained throughout construction.

Reason: To Comply with Policy 7.14 of the London Planning

Fire Statement (Compliance)

29. The development shall not be occupied/used until it has been carried out in accordance with the approved Fire Statement (Version 001 dated 28.02.2025 by CLARKE BANKS) submitted in support of the application, unless an alternative is submitted to, approved in writing by, the Local Planning Authority under this condition.

Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with Policies D5 and D12 of the London Plan 2021.

INFORMATIVES

COMMUNITY INFRASTRUCURE LEVY (CIL)

Based on the information given on the plans, the Mayoral CIL charge will be £16,336.48 (229.8 sqm x £71.09) but there will be no Haringey CIL charge as this would not be within the chargeable use classes. This will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index.

NPPF

In dealing with this application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our pre-application advice service and published development plan, comprising the

London Plan 2021, the Haringey Local Plan 2017 along with relevant SPD/SPG documents, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

Land Ownership

The applicant is advised that this planning permission does not convey the right to enter onto or build on land not within his ownership.

Hours of Construction Work

The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours:

- 8.00am - 6.00pm Monday to Friday
- 8.00am - 1.00pm Saturday
- and not at all on Sundays and Bank Holidays.

Party Wall Act

The applicant's attention is drawn to the Party Wall Act 1996 which sets out requirements for notice to be given to relevant adjoining owners of intended works on a shared wall, on a boundary or if excavations are to be carried out near a neighbouring building.

London Fire Brigade

The London Fire Brigade strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers, and can reduce the risk to life. The Brigade opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupiers.

Thames Water

With regards to surface water drainage, it is the responsibility of a developer to make proper provision for drainage to ground, water course, or a suitable sewer. In respect of surface water, it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

Advertisement

The applicant is advised that deemed consent for any business related signage applies for signs up to 0.3sqm. Any larger signage will require advertisement consent. This is in accordance with section 2 (b) of the Town and Country Planning Act (Control of Advertisements) Regulations 2007.

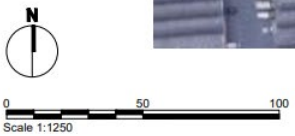
Secure by Design

The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.

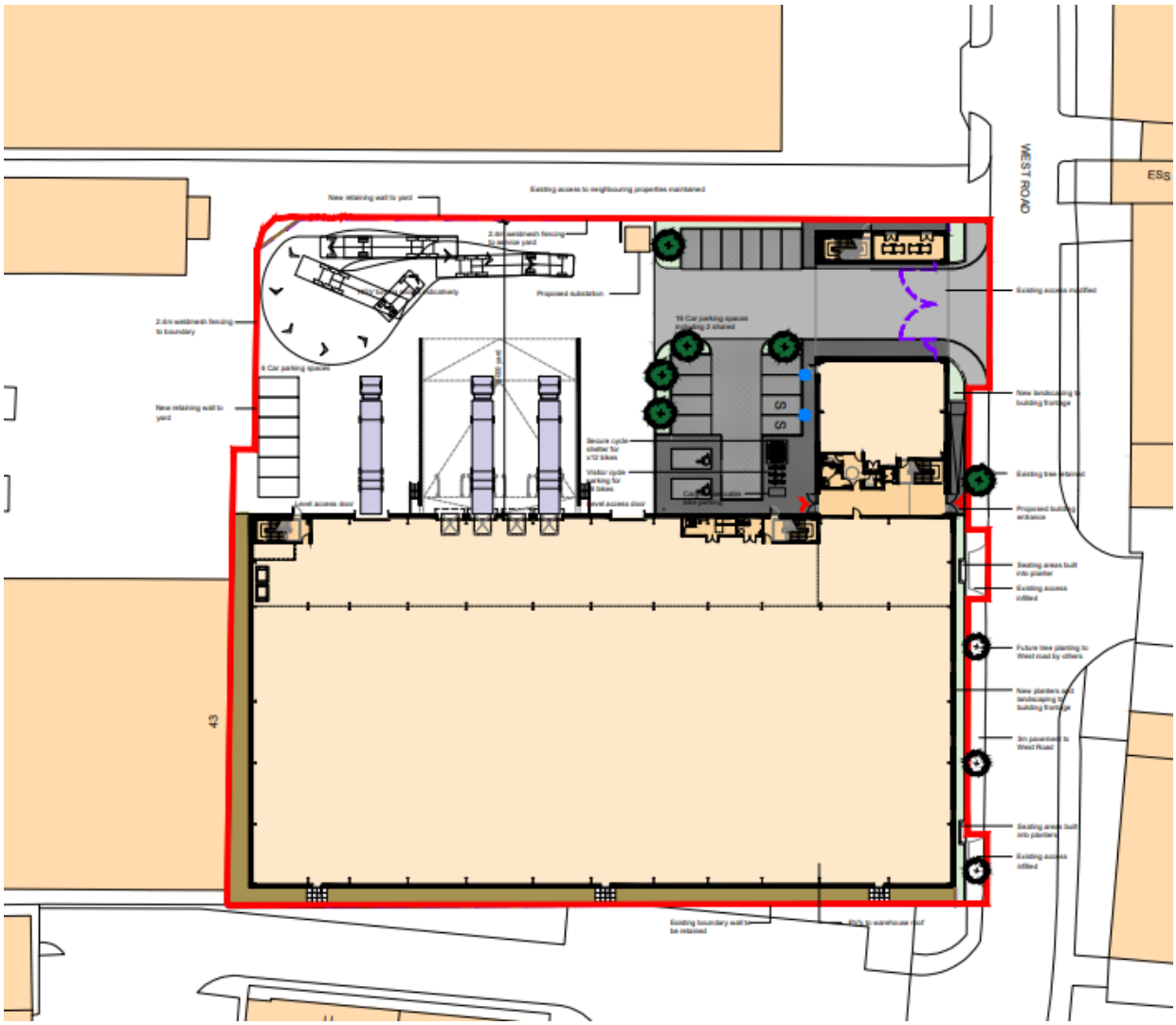
Pollution

Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.

APPENDIX 2 – PLANS AND IMAGES

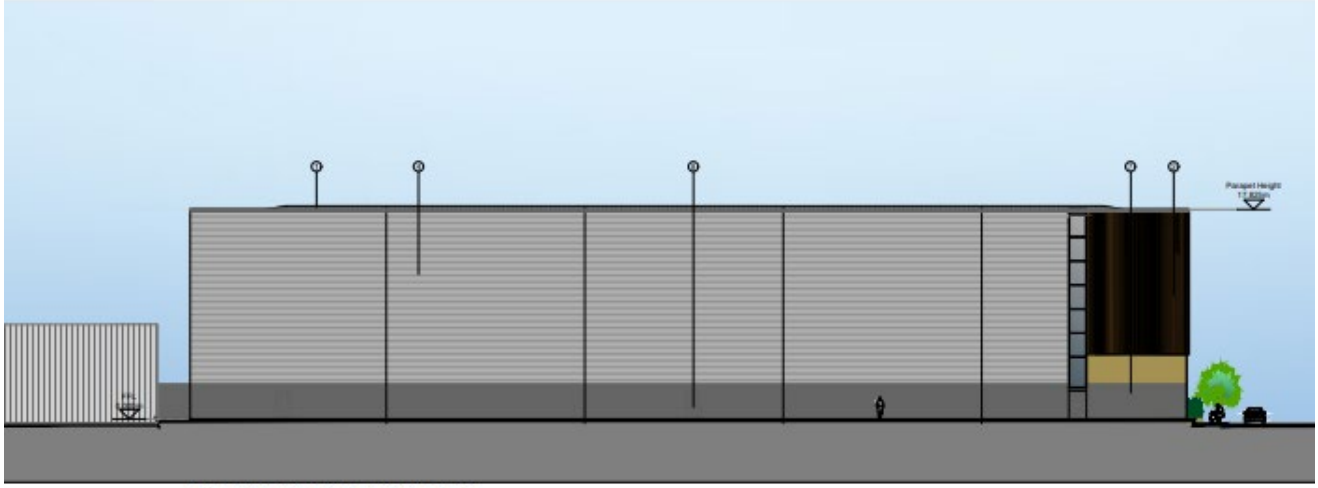


Site Location Plan



Proposed masterplan

PROPOSED WEST REAR ELEVATION



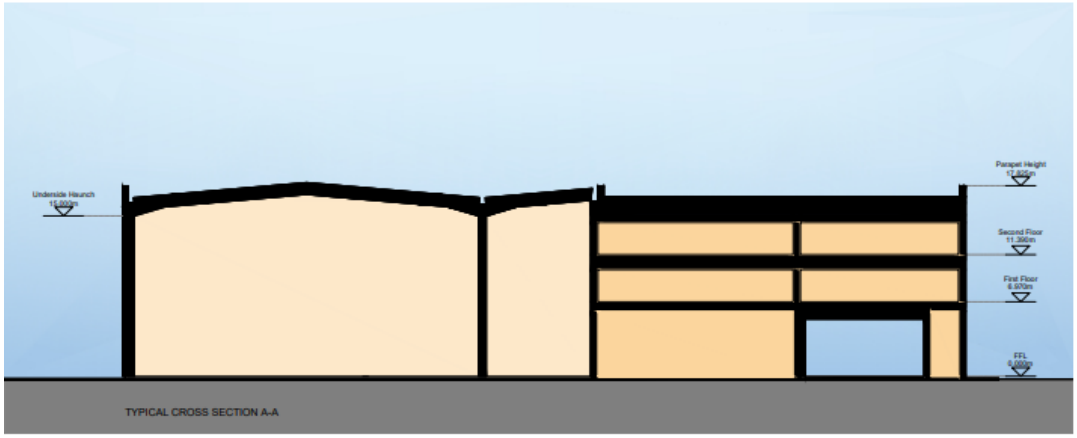
PROPOSED SOUTHERN REAR ELEVATION

Proposed Southern Rear & Proposed Western Rear Elevations

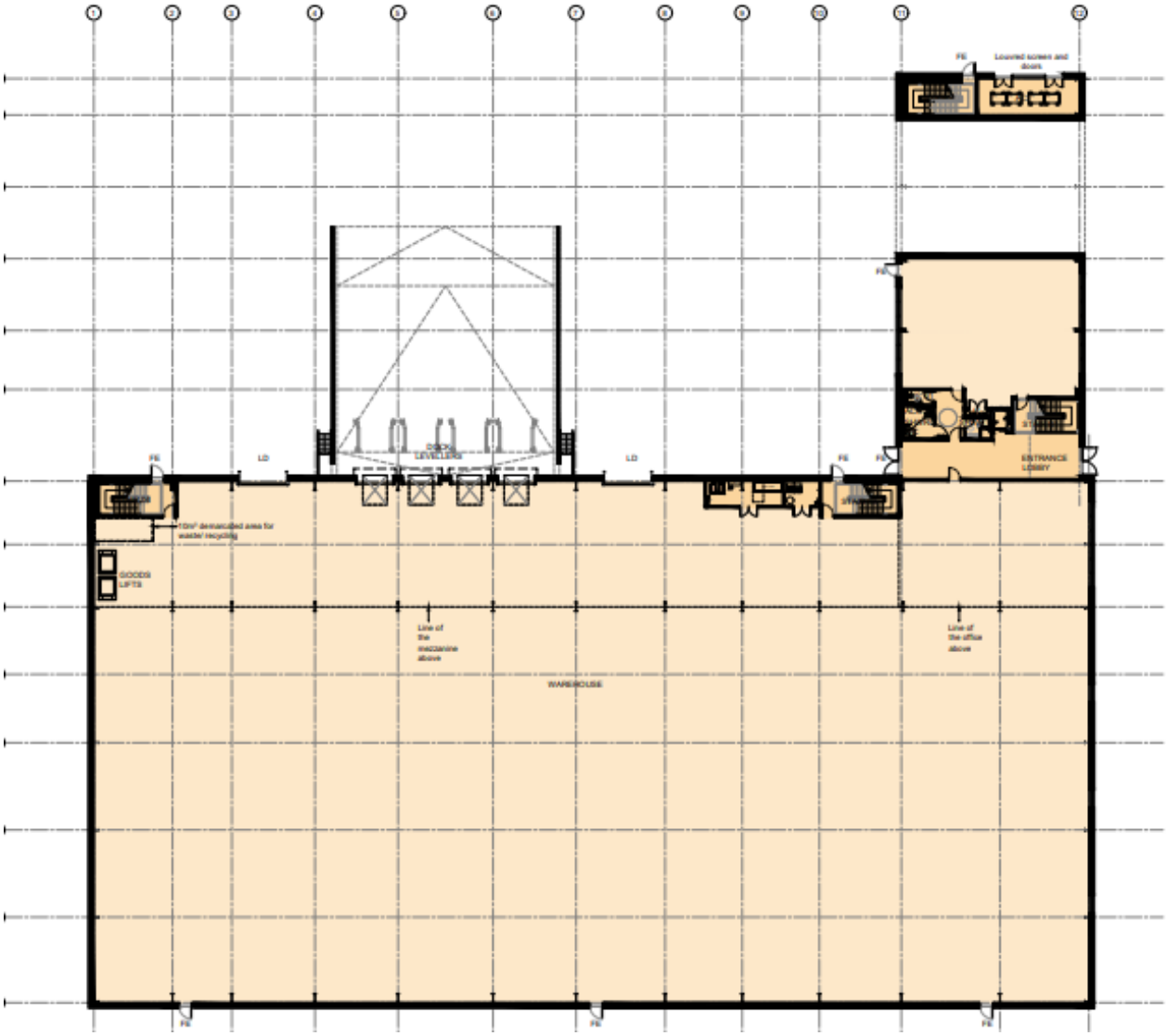
PROPOSED FRONT ELEVATION TO WESTERN ROAD

PROPOSED NORTHERN ELEVATION TO YARD

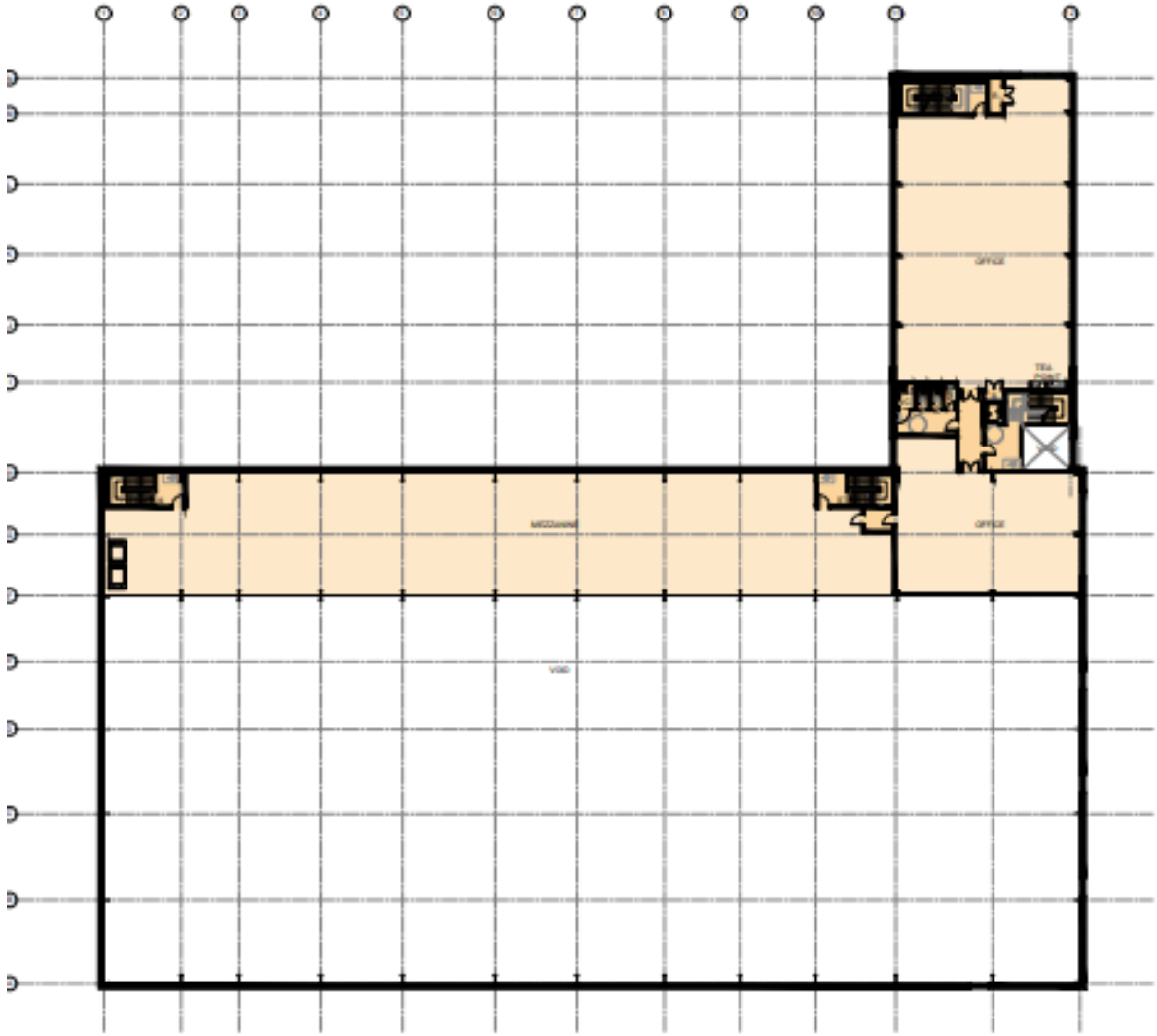
Proposed Front Elevation to West Road & Proposed Northern elevation to Yard



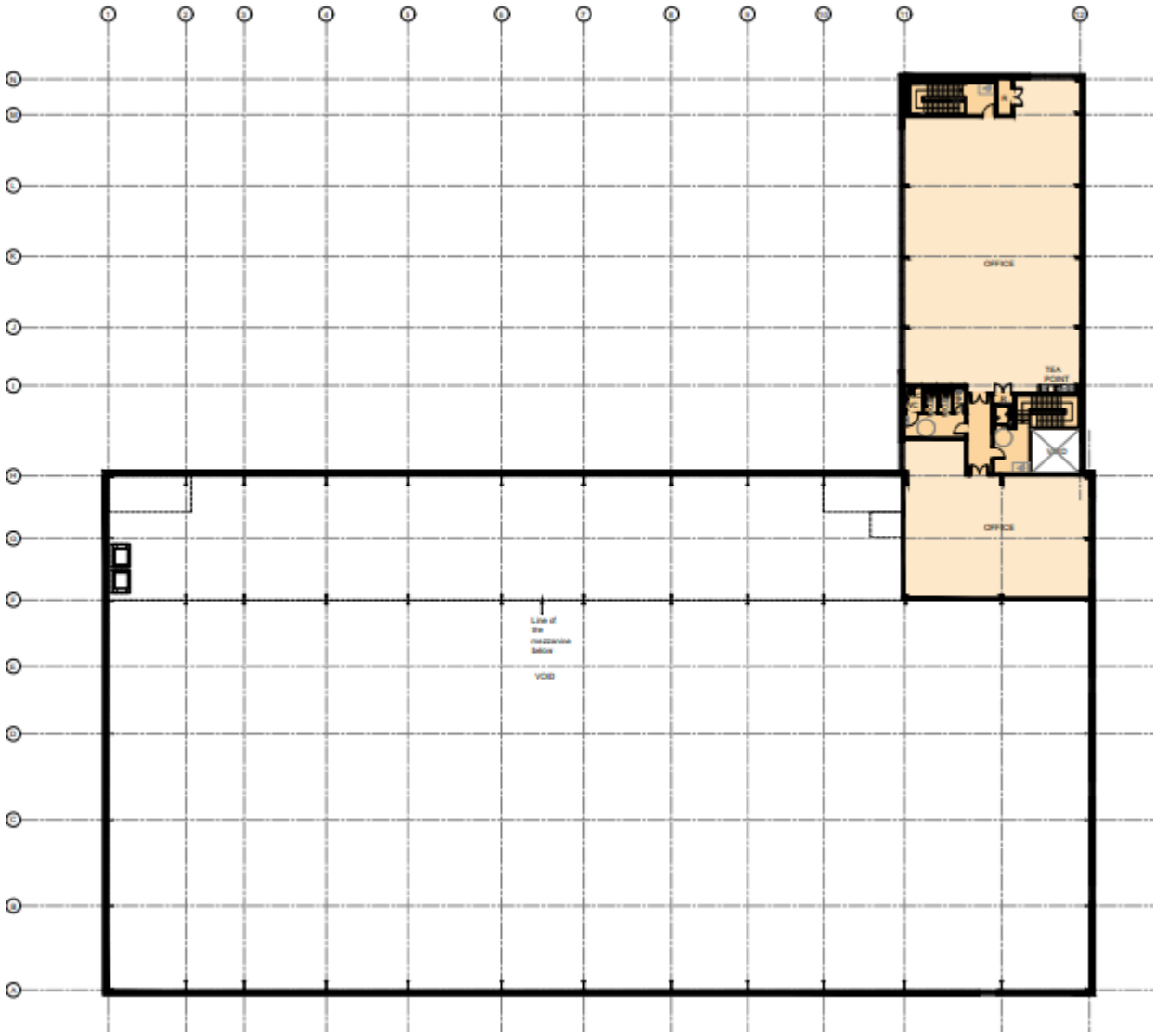
Cross Section A-A Long Section B-B



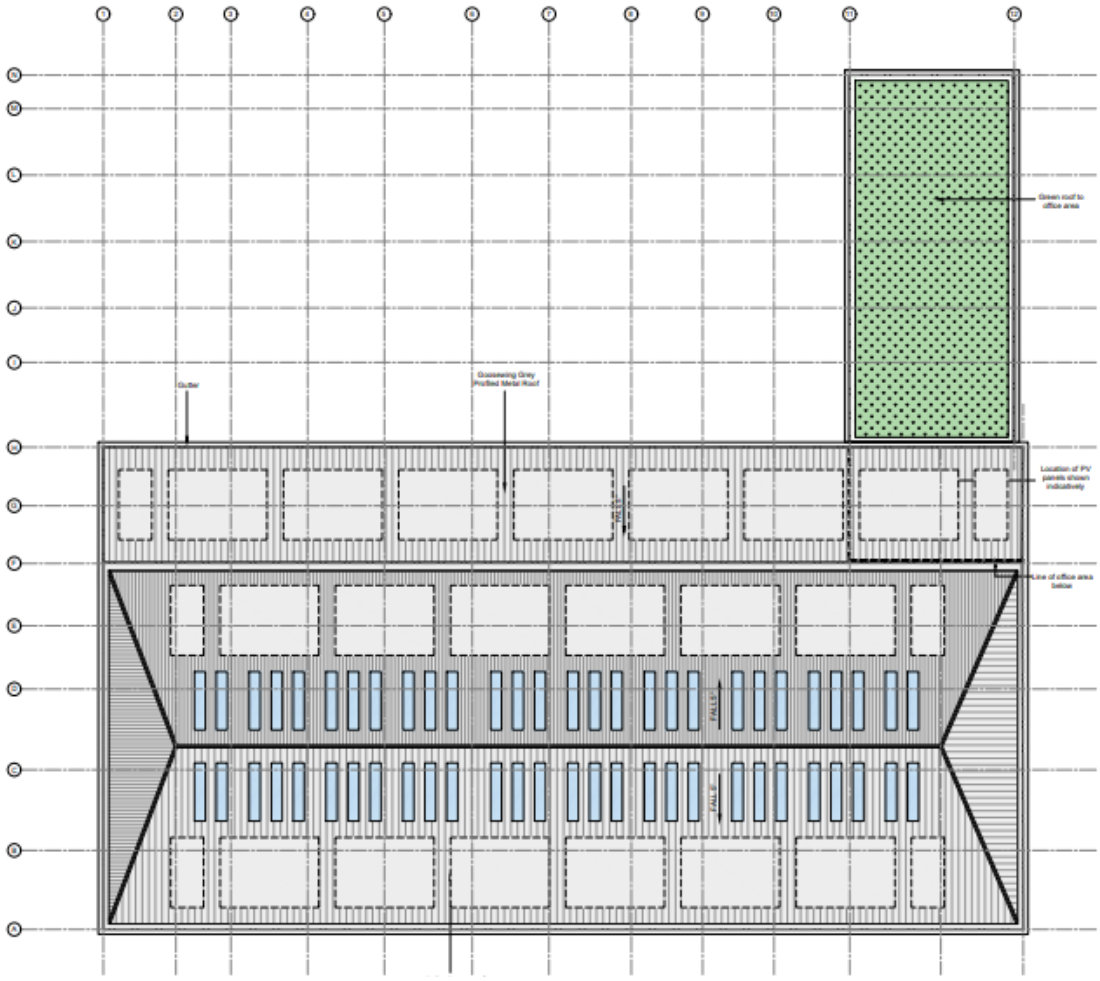
Proposed Ground Floor



Proposed First Floor Plan



Proposed Second Floor Plan



Proposed Roof Plan

Photographs of site

compass
west
WAREHOUSE
TO LET
0203 151 1011
GOODS IN

APPENDIX: 3 CONSULTATION RESPONSES FROM INTERNAL AND EXTERNAL AGENCIES

Stakeholder	Question/Comment	Response
INTERNAL		

Carbon Management	**Carbon Management Response 15/05/2025** In preparing this consultation response, we have reviewed: • Energy Statement including TM52 Overheating Assessment prepared by Shepherd Brombley Partnership (dated 25/02/2025) • Sustainability Statement (included in DAS) prepared by PRC Group (dated Feb 2025) • Whole Life Cycle Carbon Assessment prepared by AES Sustainability (dated March 2025) • Circular Economy Statement prepared by AES Sustainability (dated March 2025) • BREEAM Pre-Assessment prepared by AES Sustainability (dated March 2025) • Urban Greening Factor Plan prepared by Tyler Grange (dated Feb 2025) • Relevant supporting documents. **Summary** The development achieves a reduction of 111% carbon dioxide emissions on site, which is supported in principle. Further clarifications must be provided with regard to the Energy Strategy, Overheating Strategy and Urban Greening Factor calculation. Planning conditions are recommended to request further details on overheating mitigation measures, in addition to conditions to secure the benefits of the scheme. **Energy Strategy** Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L 2021). The London Plan (2021) further confirms this in Policy SI2. The overall predicted reduction in CO_2 emissions for the development shows an improvement of approximately 111% in carbon emissions with SAP10.2 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 22.3 tonnes of CO_2 from a baseline of 20.0 tCO_2/year. London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations.	Support Noted. Conditions attached 12,13,14,15 ,25 and 26 planning obligations secured via s106.

Non-residential (SAP10.2 emission factors)

	Total regulated emissions (Tonnes CO_2 / year)	CO_2 savings (Tonnes CO_2 / year)	Percentage savings (%)

Part L 2021 baseline	20.0		
Be Lean	17.0	3.0	15%
Be Clean	17.0	0.0	0%
Be Green	-2.2	19.2	96%
Cumulative savings		22.3	111%
Carbon shortfall to offset (tCO_2)	0		
Carbon offset contribution	£95 x 30 years x 0 tCO_2/year = £0		

Energy Use Intensity (EUI) / Space Heating Demand (SHD)
Applications are required to report on the total Energy Use Intensity (EUI) and Space Heating Demand (SHD), in line with the GLA Energy Assessment Guidance (June 2022). The Energy Strategy should follow the reporting template set out in Table 5 of the guidance, including what methodology has been used. EUI is a measure of the total energy consumed annually, but should exclude on-site renewable energy generation and energy use from electric vehicle charging.

	Proposed Development	GLA Benchmark
Building type	Industrial	All other non-residential
EUI	76 kWh/m^2/year	Does not meet GLA benchmark of 55 kWh/m^2/year
SHD	13 kWh/m^2/year	Meets GLA benchmark of 15 kWh/m^2/year
Methodology used	SBEM / BRUKL	

It is noted that applicants are only required to report their EUI and SHD. While it is not a policy requirement to meet the GLA benchmark for EUI and SHD, but applicants are encouraged to meet the benchmarks for the proposed development.

The predicted EUI is higher than the GLA benchmark. The applicant has explained due to the building being constructed as “shell and core”, the energy efficiency measures implemented is limited to the landlord core areas and the speculative “shell” areas is modelled with the worst case of unregulated energy loads, it is expected future tenants will demonstrate a lower EUI on operation of the building.

Energy – Lean

The applicant has proposed a saving of 3.0 tCO_2 in carbon emissions (15 %) through improved energy efficiency standards in key elements of the build. This meets the minimum 15% reduction set in London Plan Policy SI2, so this is supported.

The following u-values, g-values and air tightness are proposed:

Floor u-value	0.18 W/m^2K
External wall u-value	0.26 W/m^2K
Roof u-value	0.16 W/m^2K
Door u-value	1.60 W/m^2K (Personnel doors) 1.30 W/m^2K (Loading bay doors)
Window u-value	1.60 W/m^2K (Windows / Curtain walling) 1.30 W/m^2K (Rooflight)
G-value	0.36 (General glazing) 0.43 (Rooflight)
Air permeability rate	3 m^3/hm^2 @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery to office areas; (MVHR % efficiency TBC; 1.1 W/l/s Specific Fan Power) Natural ventilation for main warehouse space; Zonal extract fans for circulation areas and WCs;
Thermal bridging	TBC
Low energy lighting	100%
Heating system (efficiency / emitter)	System 1: AC heating / cooling VRF system through ASHP (Heating COP 4.11) System 2: ASHP with radiator (Heating COP 3.5) DHW: Heat pump (Seasonal efficiency 350%)
Thermal mass	Use of a dense concrete slab between floors.

<u>Actions:</u>

- The proposed wall U-value has not improved from the notional value. Applicant should improve the proposed wall U-value particularly around the heated office spaces to reduce heat loss.
- Please confirm if the “internal wall” between the heated spaces and unheated warehouse space will be insulated as an “external wall” to reduce heat loss.

	- No measures are proposed to reduce heat loss from junction details. Please set out the proposed Psi (Ψ) value. - Please identify on a plan where the MVHR units will be located within the dwellings. The units should be less than 2m away from external walls. This detail can also be conditioned. - Natural ventilation has been proposed for the main warehouse space, please confirm if there are sufficient openings to achieve the required ventilation rate and set out how natural ventilation would work across deep floor plan with no windows. Overheating is dealt with in more detail below. *Energy – Clean* London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs. The development is within approximately 554m of a planner future "Energetik Extension" network. Due to expected low heating demands as the main warehouse areas will be left unheated, the applicant has not proposed to secure a connection. However the applicant has confirmed the site will be future-proofed to facilitate a connection if an incoming future tenant has a suitable heating energy demand. A site plan has been submitted (appendix 2 of ES) showing an indicative future connection point, location of pipe between the connection point and plant room. Currently, the applicant is not proposing any Be Clean measures. A Combined Heat and Power (CHP) plant would not be appropriate for this site. <u>Actions</u>:	

- Applicant should submit evidence of discussion with Energetik to demonstrate that the predicted heating demands are deemed to be too low to warrant a future DEN connection.

Energy – Green

As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.

The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 19.2 tCO_2 (96%) reduction of emissions are proposed under Be Green measures.

The solar array peak output 158 kWP, which is estimated to produce around 141,539 kWh/year of renewable electricity per year, equivalent to a reduction of 17.85 tCO_2/year. The array of 471 panels would be mounted on a roof area of 800 m^2, at a 5° angle, along the slopes of roofs facing North and South. Roof spaces have been allocated for future tenants to install their PV systems. No battery storage has been proposed for the PV system due to the speculative nature of the development.

ASHP (HVAC system 1)	
System type	VRF
Location	Offices
Heating COP	4.11
Cooling EER / SEER	5.0/7.35
ASHP (HVAC system 2)	
System type	Central heating using radiators
Location	Circulation areas and WCs
Heating COP	3.5
Domestic hot water system	
Generator type	ASHP
Storage size	180l

Actions:

- How will the solar energy be used on site (before surplus is exported onto the grid)?
- Applicant should develop a green lease agreement that tenants will be required to confirm to, and which will secure the building services performance assumed. For

example, the agreement can include the requirements for future tenants to offset their unregulated energy emissions by installing additional PV panels in the proposed allocated roof spaces.

Energy – Be Seen

London Plan Policy SI2 requests all developments to 'be seen', to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies.

The development is being constructed as a speculative "shell and core" development with potential for various different occupier requirements. All energy metering devices will have the capability to report usage to future occupiers.

Actions:

- Please confirm that sub-metering will be implemented for commercial units.
- A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of businesses.
- What are the unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters?
- Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: (https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform)

Carbon Offset Contribution

A carbon shortfall of **0** tCO_2/year remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years.

Overheating

London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM52 with TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled 17 office spaces under the London Weather Centre files, but circulation space and entrance lobby have not been modelled. Only the results of two scenarios – baseline and passive stage 4 under 2020s DSY 1 files have been tabled in the report.

Applicant has applied the following measures according to the cooling hierarchy:

Passive stage 1	Office areas have been positioned on the north facing facades to reduce solar gain.
Passive stage 2	DHW runs are limited in occupied spaces and insulated to minimise internal heat generation.
Passive stage 3	Exposed internal thermal mass through the proposed use of dense concrete slabs between floors.
Passive stage 4	Openable windows with trickle ventilators shall be provided to office areas.

Results are listed in the table below.

Non-domestic: CIBSE TM52	**Number of habitable spaces that pass at least 2 out of 3 criteria** 1: hours of exceedance 2: daily weighted exceedance 3: upper limit temperature
DSY1 2020s	
Baseline	Pass 0/17
Passive Stage 4	Pass 2/17
Passive Stage 4 with active cooling	Pass 17/17

All spaces pass the overheating requirements for 2020s DSY1 with the implementation of active cooling. In order to pass this, the following measures will be built:

- Natural ventilation
- Glazing g-value of 0.36
- No external shading (the development has very limited south facing windows)
- MVHR with summer bypass
- Active cooling

Predicted energy consumption for cooling is 24,359 MJ annually. By applying the passive measures through stages, the predicted active cooling demand has been reduced as follows:

	Non-residential cooling demand (MWh)
Baseline	26.1
Passive stage 1	21.3
Passive stage 2	19.5
Passive stage 3	19.1
Passive stage 4	14.2

Despite the actual building cooling demand is less than the notional value, the cooling demand can be further reduced as there are further opportunities which have not been explored.

A revised overheating strategy is required to address the following actions and to demonstrate the cooling demand has been further reduced.

<u>Actions:</u>

- OH modelling should include circulation and entrance spaces.
- The applicant must demonstrate that the risk of overheating has been reduced as far as practical and that all passive measures have been explored, including improving the thermal efficiencies of the building fabric and increasing ventilation through openable windows.
- The proposed wall U-value has not improved from the notional value, the proposed wall U-value should be improved in the office areas to reduce unwanted heat gain and therefore reduce cooling demand.
- Applicant to clarify if all of the proposed windows in the offices and circulation areas are fully openable to allow ventilation.
- For the entrance atrium, the windows at top level should be openable or openable rooflight can be incorporated to encourage stack ventilation.

	- Applicant to confirm if openable windows have been proposed to the west elevation of the office spaces to allow cross ventilation. No windows have been shown on the proposed west elevation in the office areas, but they are shown on plans. - Applicant should also explore to increase the mechanical ventilation rate following the cooling hierarchy to reduce the active cooling demand. - Set out a retrofit plan for future and more extreme weather files, demonstrating how these measures can be installed, how they would reduce the overheating risk, what their lifecycle replacement will be, and who will be responsible for overheating risk. - Demonstrate how the future mitigation measures will improve the overheating results. - Confirm who will own the overheating risk when the building is occupied. - This development should have a heatwave plan / building user guide to mitigate overheating risk for occupants. **Sustainability** Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the DAS sets out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, flood risk and drainage, biodiversity, energy and CO2 emissions and landscape design. **Non-Domestic BREEAM Requirement** Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable. The applicant has prepared a BREEAM Pre-Assessment Report for the development. Based on this report, a score of 79.64 % is expected to be achieved, equivalent to 'Excellent' rating. If all potential credits were achieved, a further score of 7.57% can be added and a total of 87.21% can be achieved potentially, equivalent to 'Outstanding' rating. This is supported. **Urban Greening / Biodiversity** All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the	

	urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff. The application site is exempted from the Biodiversity Net Gain requirements as it fits under the "de minimis" criteria. The applicant has also stated the development will not result in any loss of habitats of ecological importance on-site. The proposed Urban Greening Factor (UGF) is 0.034. This value seems to be incorrectly calculated, as it is too far off from the London Plan minimum UGF 0.3 requirement for commercial developments. <u>Actions:</u> - Applicant to revise their UGF calculation and to confirm their achieved UGF is beyond the minimum required value of 0.3. - The proposed landscape plan has shown limited new green spaces, applicant should explore opportunity to incorporate further greening where possible, this can further improve the biodiversity value and the well-being of the future tenants. - Applicant to note the minimum substrate depth for the extensive green roof should be 120mm (see details in the section below), not 60mm thick as stated in the UGF calculation. ***Living roofs*** All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. The development is proposing living roofs in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. <u>The growing medium for</u> <u>extensive roofs must be 120-150mm deep</u>, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition. ***Whole Life-Cycle Carbon Assessments***	

Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.

The total calculated emissions based on the GIA (without grid decarbonisation) is estimated at:

	Estimated carbon emissions	GLA benchmark OFFICES	Embodied carbon rating (Industry-wide)
Product & Construction Stages Modules A1-A5 (excl. sequestration)	492 $kgCO_2e/m^2$	Meets GLA benchmark (<950 $kgCO_2e/m^2$) but misses the aspirational target (<600 $kgCO_2e/m^2$).	Modules A1-A5 achieve a band rating of 'C', meeting the LETI 2020 Design Target.
Use and End-Of-Life Stages Modules B-C (excl. B6 and B7)	Not provided.	Cannot assess if it meets GLA target (<450 $kgCO_2e/m^2$) and aspirational benchmark (<370 $kgCO_2e/m^2$).	
Modules A-C (excl B6, B7 and incl. sequestration)	1162 $kgCO_2e/m^2$	Meets GLA target (<1400 $kgCO_2e/m^2$) and the aspirational benchmark (<970 $kgCO_2e/m^2$).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'D', not meeting the RIBA 2030 Built Target.
Use and End-Of-Life Stages Modules B6 and B7	Not provided.	N/A	
Reuse, Recovery, Recycling Stages Module D	Not provided.	N/A	

It is noted that only referrable projects are required to submit WLCA. This is a major application, and the applicant have taken the initiative to submit a WLCA which is

	supported. While it is not a policy requirement to meet the GLA and LETI benchmarks for WLC, but applicants are encouraged to meet the benchmarks. The proposed development is mixed used and primarily an industrial building type. The GLA benchmark for 'offices' is considered the closest for comparison. Since the proposed development is not a typical office which contain more materials due to internal layouts and structure, therefore the WLCA of the proposal is expected to outperform the GLA benchmarks. <u>Actions (for later design stage):</u> - The report has identified a list of opportunities (point 7.18 of the report) to further reduce WLCA emissions. Applicant to set out their plan to implement these suggestions at later design stage. *Circular Economy* Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans. The principles used for this development are: - Designing for longevity, circa 50 years of building life, and disassembly at end of life - Designing for flexibility and adaptability of open spaces and commercial spaces The report sets out the Key Commitments, Bill of materials and Recycling and waste strategy. This is a fairly high level of information, and the applicant expects this to become more detailed as the detailed design progresses following permission. <u>Actions (for later design stage):</u> - The development proposes to demolish a large existing building resulting in a large quantity of waste. While the applicant has proposed a target of minimum 95% of demolition waste being diverted from landfills, priority should be given to reuse materials on site (not off-site). Apart from existing floor slab to be crushed for reuse as piling mat for new construction, applicant should consider other possibility of re-use materials from demolition at later design stage.	

	- The proposed main warehouse space is unheated currently. As part of the strategy for "designing for adaptability", the applicant should consider how the main warehouse space can be future-proofed to be potentially used as a heated space in the future. **Planning Obligations Heads of Terms** - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations) of £0 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages. - Future DEN connection (and associated obligations) **Planning Conditions** To be secured with amendments expected to the wording below once the revised information has been submitted. *Energy Strategy* *The development hereby approved shall be constructed in accordance with the Energy Statement prepared by Shepherd Brombley Partnership (dated 25/02/2025) delivering a minimum 111% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 158 kWp solar photovoltaic (PV) array.* *(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:* - *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;* - *Confirmation of the necessary fabric efficiencies to achieve a minimum 15% reduction;* - *Details to reduce thermal bridging including the projecting window frame details;* - *Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;*	

	- *Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;* - *Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); inverter capacity; and how the energy will be used on-site before exporting to the grid;* - *Specification of any additional equipment installed to reduce carbon emissions, if relevant;* - *A metering strategy.* *The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development.* *(b) The solar PV arrays and air source heat pumps must be installed and brought into use prior to first occupation of the development. Six months following the first occupation of the development, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.* *(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.* *<u>DEN Connection</u>* *Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:*	

	• *A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;* • *Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;* • *Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;* • *Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;* • *Details of a future pipework route from the temporary boiler location to the plant room.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.* *<u>Overheating</u>* *Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This assessment shall be based on the Thermal Comfort which was included in Energy Statement prepared by Shepherd Brombley Partnership (dated 25/02/2025) as a starting point, the revised Overheating Report should demonstrate a reduction in cooling demand.* *This report shall include:* - *Revised modelling of units modelled based on CIBSE TM52, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;* - *Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy, demonstrating that any risk of crime, noise and air quality issues*	

	are mitigated appropriately evidenced by the proposed location and specification of measures; - *Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan; mitigation measures should clearly outline the proposed ventilation strategy including the amount of openable windows and the mechanical ventilation rate;* - *Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;* - *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.* *(b) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:* - *Natural ventilation;* - *Glazing g-value of 0.36 of better;* - *Mechanical ventilation using MVHR with summer bypass;* - *Active cooling using ASHP VRF;* - *Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.* *REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.* *<u>Living roof</u>* *(a) Prior to the above ground commencement of development, details of the living roof must be submitted to and approved in writing by the Local Planning Authority. Living roof must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:* *i) A roof plan identifying where the living roof will be located;* *ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm);*	

	iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate *iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m2 of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m2, rope coils, pebble mounds of water trays;* *v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m2) and density of plug plants planted (minimum 20/m2 with root ball of plugs 25cm3) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);* *vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and* *vii) Management and maintenance plan, including frequency of watering arrangements.* *(b) Prior to the occupation of 90% of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roof has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.* *Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.* *<u>Urban Greening Factor</u>* *Prior to completion of the construction work, an Urban Greening Factor calculation should be submitted to and approved by the Local Planning Authority demonstrating a target factor of 0.3 has been met through greening measures.*	

	Reason: To ensure that the development provides the maximum provision towards the urban greening of the local environment, creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13. *<u>BREEAM</u>* *a) Prior to commencement on site, a Design Stage Assessment and evidence that the relevant information has been submitted to the BRE for a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM "Excellent" outcome (or equivalent), aiming for "Outstanding". This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.* *b) Within 6 months of commencement on site, the Design Stage Accreditation Certificate must be submitted. The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.* *c) Prior to occupation, the Post-Construction Stage Assessment and tool, and evidence that this has been submitted to BRE should be submitted for approval, confirming that the development has achieved a BREEAM "Excellent" outcome (or equivalent), aiming for "Outstanding", subject to certification by BRE.* *d) Within 6 months of occupation, a Post-Construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.* *In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.* *Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.*	

Carbon Management Response 26/06/2025

In preparing this consultation response, we have reviewed:

- HGY-2025-0617 37-39 West Road - May 2024 - SBP Responses 27-05-2025
- 25-05-27 SD - PS - Planning Application Ref HGY20250617
- 11669_PL210 A Proposed Landscape GA
- 11669_PL208A Proposed Elevations 1 of 2
- 11669_PL207A Proposed Elevations 2 of 2
- 25-05-27 SD - PS - Planning Application Ref HGY20250617 (Correspondence with Energetik)
- Energy Statement including TM52 Overheating Assessment prepared by Shepherd Brombley Partnership (Issue 2 dated 25/06/2025)

nary

There is no proposed change to the overall carbon reduction on site. Applicant has submitted information only to provide clarifications on Energy Strategy, Overheating Strategy and Urban Greening Factor Calculation.

Energy Strategy

Energy – Lean

The following new fabric specifications of the proposal has been provided:

Internal wall between heated spaces and unheated warehouse space	Internal walls at 1st floor will be insulated to 0.46 W/m^{2}K.
1st floor slab exposed in the warehouse	0.20 W/m^{2}K.
Thermal bridging	Robust junction details

Applicant has provided the following clarifications:

- **MVHR**: Detailed drawings are not yet available but the MVHR will be located within the office ceiling voids, no further than 2m from external wall.
- **Natural ventilation in deep floor plan:** The proposed use of the warehouse space is unknown at this stage. Where natural ventilation via infiltration and openable loading/personnel doors is not appropriate for a particular use it is expected that the

	building occupier will install their own ventilation solution to meet their specific needs. *Energy – Clean* Applicant has submitted evidence of discussion with Energetik confirming that the predicted demands are too low to economically warrant a future DEN connection. *Energy – Green* Applicant has confirmed the energy generated by the PV system will feed directly into the building's main electricity supply for both regulated and unregulated energy uses. Applicant has clarified that as the proposed development is a speculative development, they are unable to develop a green lease agreement. *Energy – Be Seen* Applicant has confirmed the following: - Energy sub-metering and monitoring / reporting will be installed. - A public display of energy usage and generation can be implemented if required. - Due to the speculative nature of the development, the nature of unregulated emissions are unknown and therefore no demand-side response strategy has been proposed. **Overheating** Applicant has provided the following clarifications: - Revised OH modelling has included circulation and entrance spaces, they have all passed the assessment criteria. - The proposed elevations have now indicated the openable panes of the windows. And the West Elevation has been corrected to show openable windows. - Applicant has clarified they cannot incorporate openings to atrium at ground level due to security concerns, and therefore cannot introduce stack ventilation. Solar control glazing will be provided to the atrium instead. - Mechanical ventilation to the office areas will be provided at a rate at 1.25 l/s/m2 in accordance with BCO guidance, exceeding min. Building Regulation requirements. - When the building is occupied, the owner of the overheating risk is the building occupier.	

	The proposed strategy of the retrofit plan for future weather has relied on the use of additional cooling; and also installation of internal blinds by the building occupiers. This has not followed the Cooling Hierarchy. It should prioritize passive measures such as increasing the openable areas of windows for ventilation and increase the thermal performance of the building envelope, before introducing additional cooling. This will be conditioned. It is important to note improving the U-value will indeed retain internal heat gains if natural ventilation is restricted, however this helps to limit solar gain from the outset. Unless the uses of the future building occupiers generate a lot of internal heat, otherwise improving the U-values of the building envelope in combination with good ventilation should be part of the mitigation strategy for the retrofit plan. **Sustainability** **Urban Greening / Biodiversity** The minimum substrate depth of the proposed green roof has been revised to 120mm including mounds with varying depths of 120-500mm. Bauder Flora 5 seed mix wildflower blanket has been proposed. The applicant has clarified the calculation of the proposed Urban Greening Factor (UGF) 0.034 is correct. It fails below the London Plan minimum UGF 0.3 requirement for commercial developments. However the applicant has explained the proposed B2 and B8 uses are typically exempted from the UGF requirements, and they have expected the lower figure would result in a UGF contribution agreed through the S106 process. **Planning Conditions** The proposed conditions from our previous comments have been amended and highlighted in red. For ease of reference, we have copied ALL conditions here below including those without amendments. *Energy Strategy* *The development hereby approved shall be constructed in accordance with the Energy Statement prepared by Shepherd Brombley Partnership – Issue 2 (dated 25/6/2025) delivering a minimum 111% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 158 kWp solar photovoltaic (PV) array.*	

	(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include: - *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;* - *Confirmation of the necessary fabric efficiencies to achieve a minimum 15% reduction;* - *Details to reduce thermal bridging including the projecting window frame details;* - *Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;* - *Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;* - *Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); inverter capacity; and how the energy will be used on-site before exporting to the grid;* - *Specification of any additional equipment installed to reduce carbon emissions, if relevant;* - *A metering strategy.* *The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development.* *(b) The solar PV arrays and air source heat pumps must be installed and brought into use prior to first occupation of the development. Six months following the first occupation of the development, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.*	

	(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform. *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.* *<u>DEN Connection</u>* *Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:* • *A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;* • *Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;* • *Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;* • *Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;* • *Details of a future pipework route from the temporary boiler location to the plant room.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.* *<u>Overheating</u>*	

	Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This assessment shall be based on the Thermal Comfort which was included in Energy Statement prepared by Shepherd Brombley Partnership – Issue 2 (dated 25/06/2025) as a starting point, the revised Overheating Report should demonstrate a reduction in cooling demand. *This report shall include:* - *Revised modelling of units modelled based on CIBSE TM52, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;* - *Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures;* - *Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan; mitigation measures should clearly outline the proposed ventilation strategy including the amount of openable windows and the mechanical ventilation rate;* - *Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy prioritising passive measures;* - *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.* *(b) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:* - *Natural ventilation provided by openable windows;* - *Glazing g-value of 0.36 of better;* - *Mechanical ventilation using MVHR with summer bypass;* - *Active cooling using ASHP VRF;* - *Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.*	

	REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21. *<u>Living roof</u>* *(a) Prior to the above ground commencement of development, details of the living roof must be submitted to and approved in writing by the Local Planning Authority. Living roof must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:* *i) A roof plan identifying where the living roof will be located;* *ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm);* *iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate* *iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m2 of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m2, rope coils, pebble mounds of water trays;* *v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m2) and density of plug plants planted (minimum 20/m2 with root ball of plugs 25cm3) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);* *vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and* *vii) Management and maintenance plan, including frequency of watering arrangements.* *(b) Prior to the occupation of 90% of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roof has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof shall be*	

	retained thereafter for the lifetime of the development in accordance with the approved management arrangements. *Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.* *<u>Urban Greening Factor</u>* *Prior to completion of the construction work, an Urban Greening Factor calculation should be submitted to and approved by the Local Planning Authority demonstrating a target factor has shown an improvement from factor 0.034 as shown on the Urban Greening Factor Plan prepared by Tyler Grange (dated 27/02/2025) through greening measures.* *Reason: To ensure that the development provides the maximum provision towards the urban greening of the local environment, creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.* *<u>BREEAM</u>* *e) Prior to commencement on site, a Design Stage Assessment and evidence that the relevant information has been submitted to the BRE for a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM "Excellent" outcome (or equivalent), aiming for "Outstanding". This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.* *f) Within 6 months of commencement on site, the Design Stage Accreditation Certificate must be submitted. The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.* *g) Prior to occupation, the Post-Construction Stage Assessment and tool, and evidence that this has been submitted to BRE should be submitted for approval, confirming that the development has achieved a BREEAM "Excellent" outcome (or equivalent), aiming for "Outstanding", subject to certification by BRE.*	

	h) Within 6 months of occupation, a Post-Construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved. *In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.* *Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.*	

Stakeholder	Question/Comment	Response
Waste Management	The waste and recycling strategy for the new industrial site is in line with the council's guidance, demonstrating correct materials used for bin store construction, a capacity able to house 16no. 1100L bins. Collection vehicle able to access the collection point from the rear yard and has <10m stopping point to the bin store. The plans show the turnaround the RCV must use when exiting the site with sufficient spacing. Segregation of all waste streams have been considered, including Residual, Recycling and Food Waste, depending on the type of operation that will be taking place at this development, the occupier can also sign up for a Commercial Glass service, should it be required. Simpler Recycling Legislation stipulates the necessity of separating all waste streams and the occupier must be fully aware of this and should sign up for a commercial collection service prior to commencement of operations. Veolia Haringey offer these commercial waste services and they can be reached at 020 8885 7700 or commercialwaste.haringey.vesuk@veolia.com	Supported Noted, condition 21 attached accordingly.

Stakeholder	Question/Comment	Response
Pollution	Thank you for contacting the Carbon Management Team (Pollution) regarding the above application for the demolition of all buildings and structures and the construction of single speculative building for flexible B2 general industrial, B8 storage and distribution, and E(g)(iii) light industrial uses with ancillary office, associated service yard, access point, car parking, and landscape planting at 37-39, West Road, Tottenham, London, N17 and I would like to comment as it relates to this service as follows. Having considered the relevant applicant submitted information include: Planning Statement; Geoenvironmental and Geotechnical Site Assessment prepared by TRC Companies Limited, dated December 2023, taking note of Section 2 (Site Locations and Description), 3 (Review of Site Data), 4 (Preliminary Environmental Risk Assessment), 5 (Preliminary Geotechnical Hazards Assessment). 6 (Summary and Conclusions), 7 (Recommendations for Future Work); Construction Dust Assessment with reference A5401/CDA/02 prepared by ACCON UK Limited 19 February 2025, taking note of Section 2 (Dust & Particulate Matter from Construction sites), 3 (Site Description and Baseline Conditions), 4 (Risk Assessment – Methodology), 5 (Risk Assessment – Results); 6 (Best Practice Mitigation); Air Quality Assessment with A5401/AQ/02 prepared by ACCON UK Limited, dated 19 February 2025, taking note of Section 3 (Site Description and Baseline Conditions), 4 (Methodology and Assessment Criteria), 5 (Impacts and Constraints of Air Quality), 6 (Mitigation), 7 (Conclusions); Air Quality Neutral Assessment with reference A5401/AQN/02, prepared by ACCON UK Limited, dated 19 February 2025, taking note of Section 2 (Methodology) and 3 (Conclusions); Energy Statement prepared by Shepherd Brombley Partnership, dated 25 February 2025 and taken note of the proposal to install PV panels and air source heat pumps, please be advised that we have no objections to the proposed development in respect to air quality and land contamination but the following planning conditions and informative are recommended should planning permission be granted. 1. Land Contamination Before development commences other than for investigative work:	Support noted & conditions 4,5,6, 26 and 27attached.

	a) Using information obtained from Geoenvironmental and Geotechnical Site Assessment prepared by TRC Companies Limited, dated December 2023, a site investigation shall be designed for the site. The investigation must be comprehensive enough to enable: an updated risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement Detailing the remediation requirements. The updated risk assessment and refined Conceptual Model along with the site investigation report, shall be submitted and approved in writing by the Local Planning Authority. b) If the updated risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements and any post remedial monitoring, using the information obtained from the site investigation, shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. The remediation strategy shall then be implemented as approved. c) Before the development is occupied and where remediation is required, a verification report demonstrating that all works detailed in the remediation method statement have been completed shall be submitted to and approved in writing by the Local Planning Authority. Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety. 2. Unexpected Contamination If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved. Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.	

	3. NRMM a) Prior to the commencement of the development, evidence of site registration at http://nrmm.london/ to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560 kW to be uploaded during the construction phase of the development shall be submitted to and approved by the Local Planning Authority. b) Evidence that all plant and machinery to be used during the demolition and construction phases of the development shall meets Stage IV of EU Directive 97/68/ EC for both NOx and PM emissions shall be submitted to the Local Planning Authority c) During the course of the demolitions, site preparation and construction phases, an inventory and emissions records for all Non-Road Mobile Machinery (NRMM) shall be kept on site. The inventory shall demonstrate that all NRMM is regularly serviced and detail proof of emission limits for all equipment. All documentation shall be made available for inspection by Local Authority officers at all times until the completion of the development. Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ 4. Management and Control of Dust While we take note of the Construction Dust Assessment with reference A5401/CDA/02 prepared by ACCON UK Limited, dated 19 February 2025, no works shall be carried out on the site until the specific locations of PM10 dust monitors and how these results will be made available to the Pollution for ongoing assessment has been submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details thereafter. Reasons: To Comply with Policy 7.14 of the London Plan and GLA SPG Dust and Emissions Control (2014). 5. Considerate Constructors Scheme	

	Prior to the commencement of any works the site or Contractor Company must register with the Considerate Constructors Scheme. Proof of registration must be submitted to and approved in writing by the Local Planning Authority. Registration shall be maintained throughout construction. Reason: To Comply with Policy 7.14 of the London Plan. Informative: 1. Prior to refurbishment or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out. While the above relates to matters of this service, comments from our colleagues in Transport Planning where this hasn't been done already.	

Stakeholder	Question/Comment	Response
Flood and Water Management	Having reviewed the applicant's submitted Flood Risk Assessment + Drainage Strategy report reference number 24-027_W Revision Final dated 31st January 2025 as prepared by I & L Consulting limited, we are generally content with the overall methodology as used and mentioned within the above report, subject to following planning condition to be implemented regarding the Surface water Drainage Strategy. Surface Water Drainage condition No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate: a) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method. b) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development. c) An evidence from the Thames Water confirming that the site has an agreed rate and point of discharge. Reason: To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter.	Support Noted and Condition 10 attached

Stakeholder	Question/Comment	Response
Arboriculturist	<u>Final Comments</u> Thank you for forwarding the confirmation regarding T2. Providing the tree report is conditioned, I hold no objections. <u>Original Comment</u> From an arboricultural point of view, I hold no initial concerns. An arboricultural report by SJ Stephen Associates dated 3/02/2025 has been submitted. The survey has been carried out to British Standard 5837: 2012 Trees in relation to design, demolition and construction- Recommendations. The document includes a tree protection plan, generic arboricultural method statements, and arboricultural impact assessment. I concur with much of the findings including the tree category quality classification, and the whole document can be included in the conditions. A Landscape plan has been included. This includes the planting of five new suitable trees and soft landscaping. An Urban Green Factor has been carried out and meets the requirements for an industrial estate. My only query is that some of the plans (Arboricultural Report) include T2 Ash for retention and the other documents do not. There appears no need to remove T2. We will require clarification of the future of T2 Ash tree.	Supported Noted condition 24 attached.

Stakeholder	Question/Comment	Response
Inclusive Economy	Final Comments I think that is fine. I've had a look at them and they have developed similar spaces before. I don't think we need them to work that out at this stage. I think we would just want to point them to the workspace design guidance in the fit out of the respective occupier. Initial Comments Looking at it I think it seems very positive that the application is not seeking to reduce employment space but intensifying the amount of space in line with the industrial area. It is also consistent with our workspace design guidance which has high demand for conventional commercial space in North Tottenham and seeks to encourage workspace with frontage that enhances the public realm, and as noted in the planning notes the office front supports this. The only outstanding thing from my perspective is their intended use of the employment space. It seems positive it has a good amount of SQM but without understanding exactly what sort of tenants they'll seek to attract it's hard to know how this relates to jobs, as it displaced 15 existing jobs it would be good to know their intention with the space and feel confident it supports an uplift in jobs (which I imagine it would). The workspace design guidance suggests 'engagement with potential users, and professional technical advice should be sought, at an early stage in the design to ensure the workspace will meet the needs of potential tenants' it would be good to understand if anything has been done as part of their planning to establish the needs of tenants. Beyond that however I think it seems positive, accounting for some of the areas in your planning notes to be considered.	

Stakeholder	Question/Comment	Response
Noise Team	Officer Final Comments Following the applicant's responses I do not have any objection Applicant response *Its imperative that we avoid any kind of restriction on nighttime deliveries. For our site it seems wholly unreasonable as well, our site is within a designated SIL (Brantwood Road Industrial Estate) and surrounded by industrial units on all sides. It would also be against London Plan Policy E5 that states that industrial type developments should be able to operate on a 24 hour basis. The submitted Noise Impact Assessment also concludes that there is no increase in road traffic noise as a result of the proposed development and that the combined rating noise level of plant noise, break-out noise and delivery noise does not exceed the background noise levels during the daytime and nighttime periods and as such demonstrates that there will be no adverse impact on health of quality of life for anyone at the local noise sensitive receptors.* *As the application description states, the proposal is for a speculative employment development for flexible B2, B8, Egiii uses. What further information would the noise officer like to see?* Initial Comments I have read the Noise Impact assessment, and I agree with most points. The only issue I can see and comment on is the HGV deliveries, especially at night time and I think a condition on the number of nighttime deliveries if any are allowed. If when operational they are running throughout the night that will have an impact on residents if HGV lorries are reversing and unloading and loading at noise sensitive hours. Can we find out more information on this point?	Support Noted. Condition 18 attached.

Stakeholder	Question/Comment	Response
Transportation	Proposal: Demolition of all buildings and structures and the construction of single speculative building for flexible B2 general industrial, B8 storage and distribution, and E(g)(iii) light industrial uses with ancillary office, associated service yard, access point, car parking, and landscape planting. Description An application has been received seeking planning permission to demolish the existing building and structures in order to construct flexible B2 general, B8 storage and distribution and E(g)(iii) light industrial uses with ancillary office space, service yard, new vehicle access, and car parking. The existing was previously used as a food wholesaler, and is currently vacant. Car parking would be located within a service yard. 22 spaces would be provided with some these being allocated towards the following: 2 car sharing spaces and 2 disabled bays. 2 dual electric charging points would support up to 4 spaces. Cycle parking will be provided via 12 long-stay and 6 short-stay spaces. 6 loading docks would be located within the service yard; it is envisaged that this would be used by 16.5m HGVs. There are currently a number of both different accesses and crossovers along West Road from the development that would be amalgamated into a new single access. Based upon employment density data within the site could employ between 115-211 staff on-site. The proposal site has a PTAL rating of 2 indicating that its access to public transport is reasonably good when compared to London as a whole suggesting that there will be a strong reliance on the private car for trip making. The site is located within the Tottenham Event Day CPZ, which restricts parking to permits holder only Monday to Friday 17:00 to 20:30 when events are on at the Stadium. Further restrictions are in place the weekends and on public holidays. This means that when events are not on vehicles are able to park on local streets. The proposal site fronts onto West Road which is an adopted highway with a speed limited of 20mph and has a width of approximately 8.3m, although at points is decreased to c.5.3m due to on-street resident parking bays. It should be noted that the site is well connected to the A406 North Circular Road that is apart of the	Support Noted. Condition 7,9,19,20,21and 22 attached. Financial Obligations to be secured via s106,

	London's Strategic Road Network. The proposal site has convenient access to shops, services, and transport links. The nearest station to the site is Northumberland Park Rail Station which is around a 9 min walk and 2 min bike away, Meridian Water Station is nearby but though is not served by as many direct train services. White Hart Lane Overground station is nearest is nearby but walking distances are greater than 15 min. Commercial floorspace Existing: 5,814 sqm Proposed: 5,989 sqm Trip generation Information has been provided with regards to trip generation that will be created by vehicles traveling to/from the site. Data has been collected from the TRICS database to ascertain the sites possible generated trip rates. Here two sites were selected with these being in Hayes (8,673 sqm) and Crayford (20,400 sqm). The data has further been broken down into the use classes of the what the application the is seeking planning permission for. Daily two-way vehicle trips during can be seen below: • Food distribution: 254 • Commercial Warehouse: 176 • Industrial unit: 209 Initially the 2011 census data was submitted to show the modal split of the site through method of travel to work. However, though further conversation between LBH Transport Planning and the applicants transport consultant's further data was submitted captured from the 2021 census data for the same output area. This is as follows: • Public transport: 37% • Car: 47% • Bicycle: 4% • Foot: 8% • Taxi: 1% • Motorcycle: 1% Overall, the above data shows whatever use class is implemented has the potential to create a higher number of vehicle trips than public transport as seen from the	

	modal split data. However, it should be highlighted that when examining the existing use compared to the proposed use the site would have a worst-case scenario of an increase of 8 two-way trips. Future parking demand No parking stress has been submitted as apart of the planning application. The developer/applicant has laid out that the reasoning behind the lack of a parking assessment was due to an obligation of HGY/2024/1370 which set that it would provide a contribution towards parking management. However, this amount was secured to tackle the historical issue of illegal parking on Brantwood Road and West Road. Therefore, given that the local CPZ only operates when events are on at the stadium employees from the future site would be able to park on-street. It was demonstrated through HGY/2024/1370 parking stress survey, that was conducted from 07:00-15:00 and covered an area of 500m. It found the highest parking levels to be at 07:00 with on-street parking levels to be at 78%. Although, West Road had a higher parking stress over the same period. Car parking Planning policy requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. For industrial sites such as this the London Plan 2021 states that they should be assessed on a case-by-case basis, though it further elaborates that the starting point for commuter parking be determined with number standards laid out in table 10.4 of Policy T6.2 Office Parking. Determining the development sole parking provision on these standards would mean that they would be allowed to have upwards of 60 spaces. The total general parking of 18 bays is significantly below this number and could be determined to be a shortfall given the employment density based upon uses could be between 115-211 for classes Egiii/B1c, B2, and B3. Additionally, not much has been supplied on how the 2 shared bays will be utilised as part of the travel plan or how they will be operating day to day. Their use will need to be restricted as they are not considered as part of the sites overall general parking provision. Their usage will need to be determined as part of car parking management plan. When looking overall at the travel to work data from the 2021 census SOA area for E02000398: Haringey 002 Northumberland Park which the site sits within is at	

	44% car driver mode share with another 3% for car passengers of residents travel to work by car from their homes in the area. Subsequently, there is opportunities for the on-site car parking provision to fall short of the required numbers given the number of possible employees and bays available, leading to possible overspill on to the local road network. The London Plan 2021 T6.5 non-residential disabled persons parking states that disabled person parking should be provided in accordance with the levels set out within the policy. With at least access being provided to 1 on or off-street disabled persons parking bay. As a minimum 5% of the on-site car parking spaces must be designated disabled persons parking bay from the outset and 5% of bays should be enlarged. Thus, the proposal would need to provide at least 1 space and the 2 being provided is above this and is 9% of the sites total parking allocation. Finally, all designated disabled bays and enlarged will need to be designed in accordance with the design guidance provided in BS8300: Vol 1. LBH Transport Planning will require a planning condition for a car parking management plan for the site's wider car parking provision including the 2 disabled bays and 2 shared spaces to understand how parking will be allocated and reviewed in line with a Travel Plan. For the site to fully comply with policy the applicant/developer will be required to enter into a S.106 agreement for a contribution towards additional parking restrictions in the form of changes to the existing CPZ proposal from an event day only CPZ to an all week CPZ within the surrounding streets. Cycle parking The sites proposed on-site cycle parking has been assessed against the published London Plan 2021 Policy T5 Cycle parking standards for compliance. Policy T5 Cycle requires that developments 'provide the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located and be in accordance with the minimum standards. The proposed development would see the provision of 12 long-stay and 6 short-stay cycle spaces. With regards to policy requirements the developer has utilised B2-B8 cycle parking standards which	

	requires the following numbers: 1 space per 500 sqm (GEA) for long-stay and 1 space per 1000 sqm (GEA) for short-stay. This means the developer would need to provide 12 long-stay and 6 short-stay. Consequently, the development is in accordance with this policy which is welcomed by LBH Transport Planning. The location and design of the cycle parking has been provided through designs. The long-stay parking looks to be provided via a bike box near to the vehicle under croft access and to the building main entrance. It is explained in the plans that this will also include a cargo bike, though it is unsure how this will be implemented based upon design. It is recommended the requirement to meet the 5% enlarged cycle spaces within the LCDS should be provided via a standalone enlarged Sheffield stand given they would be required to provide at least one space. It is still unclear if the bike box will be two-tier, though given its size this is highly likely it will utilise two-tier stackers. Adjacent to this will be 6 spaces for the short-stay space that will be arranged side by side through 3 Sheffield stands. Overall, the designs are lacking in detail and how they will be operated though this must be conditions as part of the planning application. Details relating to the cycle parking will be secured by a pre-commencement planning condition requiring the applicant to submit details of cycle parking spaces in line with the London Plan 2021 Policy T5 Cycle and Transport for London's London Cycle Design Standards (LCDS) which must be submitted and approved before development commences on-site. Electric vehicle charging The published London Plan 2021 does not have specific requirements for electric vehicle charging points for car parking for Use Classes such as this. However, as the site has used office car parking standards to determine the required amount of on-site car parking LBH Transport Planning will determine electric vehicle provision against the London Plan 2021 Policy T6.2 Office Parking which that 'Operational parking requirements should be considered on a case-by-case basis. All operational parking must provide infrastructure for electric or other Ultra Low Emission vehicles, including active charging points for all taxi spaces'. As stated above the development would be providing 2 dual charging points to support 4 spaces with the car parking area. Although, initial information within the within the Transport Statement	

	suggested that this number would be higher at 4 dual charging points to support 8 spaces. In order to ensure that the site is supporting future zero emission travel to the site by employees the council will require that remaining spaces have capacity built in from the offset for passive electric charging points. LBH Transport Planning will require a pre-commencement condition stipulating that a more detailed plan be submitted for approval showing 4 car parking spaces being supported with active, and 18 passive vehicle charging points. Access An Active Travel Zone (ATZ) has been produced and submitted as part of the Transport Statement. 5 walking routes to key destinations were analysed and assessed against the Healthy Streets indicators. These routes were: • Route 1: site to/from Bus stops on Willoughby Lane adjacent to Frederick Knight Sportsground • Route 2: site to/from Bus stops on Northumberland via Blaydon Walk • Route 3: site to/from Meridian Water Rail Station • Route 4: Site to/from White Hart Lane Overground Station LBH Transport Planning would highlight that the inclusion of Northumberland Park Rail Station over Merdian Water Railway station would have been more prudent given that Merdian Water is a further walking distance and has less stopping services. Some of the recommendations for improvements to these routes include promotion of electric vehicle usage which the borough is doing through the implementation of more EV charging points, promotion of measure to reduce car use, improvements to the footway along west side of West Road, improvements to footway along Brantwood Road HGY/2024/1370 application site, tree planting once Meridan One is complete and upgrade of pedestrian crossing where needed. The Transport Statement collision data has been used to understand the road environment near to the site for all modes, the period covers a total of 5 years though the dates have not been shared. There are a number of different areas with a high number in collisions that can be seen on Brantwood/Willoughby Lane and Brantwood/Tariff Road. This is involving both a large number of slight and some serious collisions. Again, due to the nature how the data has been presented LBH Transport Planning are unable to determine what modes of transport were involved in these collisions. When examining data from the TfL Road Reduction Dashboard	

	between 31/12/20219 – 31/12/2024, only one serious collision was recorder on the roundabout on Willougby Lane which involved a pedestrian and a good vehicle. No recommendations have been given on addressing any collisions. A new pedestrian gated access would be created adjacent to the vehicle gate located in the under-croft area. From the gate there is a footway that leads onto the entrance to the building. to the wets of the site there is a group of 6 spaces are not which do not have any pathways for employees to safely to get the mina entrance meaning they will need to navigate across the yard, but there is an entrance to the south of them proceeding into the building. Highways works The development has proposed and will require several changes to the adopted highway for the site to fully operate and for occupation to take place. The proposal looks to remove the many vehicle crossovers, drop kerbs, and off-street loading bays that have historically been there for some time. Some of the works will entail, a new gated vehicle access, removal of existing redundant vehicles crossover and reinstatement of the footway, extension of existing on-street parking bays, and establishment of road markings for parking restrictions. Given that they are constructing new vehicles access a Road Safety Audit Stage 1 should have been conduced and submitted with the application, which has not happened. There are concerns with how the gate will function, it is envisaged that the gates will be manually operated, though this will prolong the length of time that a 16.5m HGV will be blocking the highway. The new vehicles gates will be receded 6.4m into the site, this is enough for most small cars but not for anything for the size of a box van and up. Furthermore, visibility splays have been produced showing a 25m distance north/south on West Road for vehicles leaving which is optimum on a 20mph road. given the site will be used for deliveries by 16.5m their elevated driving position grants drivers better sight lines then lower vehicles. The red line boundary shows much of the adopted highway being within the red line boundary, which includes the provision of benches and planters. No commentary is provided on how this will be secured or maintained going forward if planning permission is granted. Any modification to the public highways will require discussions with the relevant individuals within the council's highways department.	

	With regards to landscaping plans submitted appears to show several trees being planted onto footway along West Road. Although their placement may result in issues with hits on the trees or being destroyed as it is an industrial area with heavy large vehicle usage. Therefore, the placement near to the kerb puts them at risk of being damaged from passing vehicles overhanging onto the footway. Any proposal for the placement of new trees on the adopted highway will require consultation with the appropriate officer, and surveys of the footways. LBH Transport Planning would require a stage 1 and 2 Road Safety Audit to be completed during the design stage of any potential S.278 works. These works would be subject to further detailed design and approval and will have to be secured as part of a S.278 agreement between the council and applicant. Service and delivery A draft Service and Delivery plan was submitted in support of the planning application. The site looks to have 6 loading docks that will be serviced by 16.5m HGVs, the floorspace will see an increase of 179 sqm from its existing size. No exact routing has been provided or proposed as part of the application for HGVs. However, as suggested below its close proximity to strategic roads gives this site the unique opportunity for deliveries not to be via residential streets. Additionally, this detail can be secured as part of a Service and Delivery plan. 4 TRICS surveys sites were used to determine the trips generated by the site for deliveries. these site are located in Bedford, Holmewood, Hampshire, and Sussex. Their floorspace ranges from 3500 sqm – 7000 sqm. there will be major differences with these sites in terms of two-way trips have been broken as demonstrated below: • Food distribution: 53 • Commercial warehouse: 40 • Industrial: 16 Space is to be created for cargo bikes, thought these could not be seen on plans. Any future Servicing and Delivery plan will need to set out how deliveries via cargo bikes can be integrated successfully to reduce the use of larger vehicle types and push sites use of sustainable forms of travel. Swept path drawings have been submitted showing how 16.5 HGVs can enter and leave the site in a forward gear including the loading docks effectively. Vehicles will	

	drive into the site in a forward gear and then reverse into the spaces. Swept paths for vehicle entering/leaving from West Road demonstrate there is not issue with entering vehicles, although 16.5 HGVs make a wide turn getting lose to the parked vehicles across from the proposed entrance, though this will need to be addressed through the S.278 process. LBH Transport Planning will require a revised Service and Delivery Plan to manage deliveries accessing the site and to limit the number of trips to the site to manage the impact on the highway network, in accordance with the published London Plan 2021 Policy T7 Deliveries, Servicing, and Construction. Travel plan A draft Travel Plan has been received for the site. Through initial conversation with LBH Transport Planning and the applicant's consultants a subsequent travel plan draft has been received. As part of the ongoing process to improve sustainability through travel a travel plan is required to have targets to help the aims of the document be met. These are then measured out through years 1, 3, and 5 to see where growth and reduction can happen where needed. For this site they have utilised the 2021 modal split for travel to work to reflect on where improvements can be made. For car use year 1 it sits at 44% with an aspiration to have this reduced to 20% by year 5. There is a desire to grow the use of public transport from 37% to 55% over a five-year period. One method in which the new site would seek to reduce over car use would be through the use of car sharing. Staff would be guaranteed spaces for their vehicles along with shared costs with other staff. Given that 2 shared spaces would be provided from the off set for this usage it is still not understood how their allocation will help to create an overall reduction in car usage to the site, and not just used as part of the general parking. Subsequently, in order to have these changes enabled it will require measurable hard actions to enact change especially the provision of car usage. Overall, LBH Transport Planning find the current submitted Travel Plan draft to be sufficient for a site of this size and this stage of the process. Therefore, there will be a Travel Plan Monitoring Fee to be paid per year for the first 5 years for the separate submission of the commercial travel plans that will be secured by way of a S.106 obligation.	

	Construction and logistics A draft Construction Logistics Plan (CLP) has been developed and submitted as part of the application. It sets out some of the basic principles of how the development will be built including: programme of works, vehicle routing/access, trip generation, monitoring, and existing site conditions, and demolition works phasing. Vehicle types are currently unknown, though CLP documents at this stage can be speculative given most developers do not have a construction contractor unto planning permission has been given typically. It should be noted though that current submitted routing to/from the site for vehicles will be to proceed north along West Road, then east on Brantwood Road to Leeside Road to then eventually onto the A406. Therefore, this keeps vehicles away from residential and high streets and only uses strategic roads built for heavy vehicles. It be made clear that the red route on West Road and Brantwood Road are not operated by Transport for London, but by Haringey Council therefore enforcement is on the borough to undertake. Trip generation shows that peak numbers for the entirety of the work will be around 155-465 trips per month, with daily trips being between 7-21. Detail is currently missing at this stage within several sections of the document. Though, these reasons have been stated above, for any future submission more information will be required on trip generation, swept paths, and possible forms of mitigation to offset construction. All routing will need to be agreed as part of the revised CLP which must be secured via a S.106 obligation. A staff construction travel plan will need to be created; effective monitoring is needed to ensure that no worker is travelling by car to the site and parking locally given. Before construction can begin a general highway, survey will need to be carried at to ascertain the condition of the footway and highway to determine if vehicle accesses will need to be reinforced. A further survey will need to be undertaken after works has been completed to determine if the condition of the highway has deteriorated during construction. A fully detailed draft of a worked-up Construction Logistics Plan will be required for review and approval prior to commencement of any site works. The applicant will need to liaise and discuss intended means of access and servicing the site from the Highway with Haringey Council's Network Management and Transport Planning teams. The outcomes of these conversations will need to inform the finished CLP.	

	A CLP should include the following: • High provision of cycle parking for workers for all phases of construction to promote uptake of cycling to/from the site. • Givens the sites excellent connectivity to public transport which is demonstrated through its close proximity to public transport, and local parking restrictions no on-site car parking should be provided for workers. • The following times, 08:00-09:00, 15:00-16:00, and 17:00-18:00, will need to be avoided by delivery and construction vehicles as to prevent vehicles from related to the development travelling when the road network is at its busiest because of school dop-off/pick-up times and peak road congestion. • Effort should be made to have a process in place to deal with delivery/construction vehicles that turn up late or announced, as to prevent vehicles waiting on the public highway causing an obstruction or waiting on nearby residential streets given the sites location. LBH Transport Planning would require that a Construction Logistics Plan (CLP) be submitted by the developer/applicant, this can be secured via a S.106 obligation. The developer/applicant will need to adhere to Transport for London's CLP guidance when compiling the document, construction activity should also be planned to avoid the critical school drop off and collection periods, the applicant will be required to pay a construction travel plan contribution of fifteen thousand pounds (£15,000) for the monitoring of the site's construction activities. Recommendation There are no highway objections to this proposal subject to the following conditions, S.106 and S.278 obligations. Conditions 1. Delivery and Servicing Plan and Waste Management The owner shall be required to 2. Cycle Parking The applicant will be required to submit plans showing accessible; sheltered, and secure cycle parking for 12 long-stay, 6 short-stay, 1 cargo cycle stand parking space for approval. The quantity must be in line with the London Plan 2021 T5 Cycle and the design must be in line with the London Cycle Design Standard. No	

	Development (including demolition) shall take place on site until the details have been submitted and approved in writing by the Council. REASON: to be in accordance with the published London Plan 2021 Policy T5 Cycle, and London Cycle Design Standards (LCDS). 3. Electric Vehicle Charging Subject to a condition requiring the provision of 2 active dual charging points to support 4 spaces and 18 passive electric vehicle charging points to serve the on-site parking spaces from the onset. Reason: to be in accordance with published Haringey Council Development Management DPD, Chapter 5 Transport & Parking and the published London Plan 2021 Policy T6.2 Office Parking. 4. Disabled parking bays The applicant will be required to submit and provide plans showing how the 2 disabled bays will be allocated and utilised from the onset; this must be submitted for approval before any development commences on site. REASON: to ensure the development is in accordance with the published London Plan 2021 T6.5 Non-residential disabled person parking. 5. Car Parking Management Plan The applicant will be required to provide a Car Parking Management Plan which must include details on the allocation and management of the on-site car parking spaces including all accessible car parking spaces. S.106 obligations 1. Construction Logistics and Management Plan The applicant/developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development, and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £15,000 (fifteen thousand pounds) to cover officer time required to administer and oversee the arrangements, and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and businesses. The plan shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved:	

	a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway. b) The estimated number and type of vehicles per day/week. c) Estimates for the number and type of parking suspensions that will be required. d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. e) The undertaking of a highways condition survey before and after completion. f) The implementation and use of the Construction Logistics and Community Safety (CLOCS) standard. g) The applicant will be required to contact LBH Transport Planning to agree on a highway condition survey. h) Site logistics layout plan, including parking suspensions, turning movements, and closure of footways. i) Swept path drawings. Reason: to ensure that the impacts of the development proposal on the local highways network are minimised during construction, and to coordinate construction activities in key regeneration areas which will have increased construction activities. 2. Commercial Travel Plan A commercial travel plan must be secured for each unit by way of a S.106 agreement and submitted 6 months before occupation. As part of the travel plan, the following measures must be included in order to maximise the use of public transport. a) The applicant submits a Commercial Travel Plan for the commercial aspect of the Development and appoints a travel plan coordinator who must work in collaboration with the Facility Management Team to monitor the travel plan initiatives annually for a period of 5 years and must include the following measures: b) Provision of commercial induction packs containing public transport and cycling/walking information, available bus/rail/tube services, showers. Lockers, map and timetables to all new staff, travel pack to be approved by the Councils transportation planning team. c) The applicant will be required to provide, showers lockers and changing room facility for the commercial element of the development.	

	d) The developer is required to pay a sum of £3,000 (three thousand pounds) per year per Travel Plan per unit, £15,000 (fifteen-five thousand pounds) for monitoring of the travel plan for a period of 5 years. This must be secured by S.106 agreement. e) The first surveys should be completed 6 months post occupation or on 50% occupation whichever is sooner. Reason: To promote travel by sustainable modes of transport in line with the London Plan 2021 and the Council's Local Plan SP7 and the Development Management DMPD Policy DM 32. 3. Parking Management Contribution. We will require a contribution of £24,000 (twenty-four Thousand Pounds) from the applicant to undertake a review of the current parking management measures on West Road and local roads within the industrial are that are contained within the Tottenham Event Day CPZ for the implementation of parking and loading measures and potential changes to the CPZ operational hours. REASON: To implement parking management measures to mitigate the impacts of the additional car parking demand that will be generated by the development proposal on the local transport network. 4. Highway Improvements The applicant will be required to enter into agreement with the Highway Authority under Section: 278 of the Highways Act, to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements, improved pedestrian infrastructure. The developer will be required to provide details of any temporary highways including temporary TMO's required to enable the occupation of each phase of the development, which will have to be costed and implemented independently of the main S.278 works. The works include but are not limited to: The provision of a new vehicle access on West Road, removal of redundant dropped kerbs and vehicle crossovers, installation of new parking bays and associated road markings, and repair/reinstatement of new footway The scheme should be design in line with the 'Healthy Streets' indicators perspective, full list of requirements to be agreed with the Highways Authority. The applicant will be required to submit detailed drawings, and a Stage 2 road safety audit of the	

	highways works for all elements of the scheme including the details of the footpath, these drawings should be submitted for approval before any development commences on site. Reason: to improve accessibility to the site by foot and to ensure that the site is in accordance with the London Plan 2021 Policy T2 Healthy Streets a to implement highway works to facilitate future access to the development site.	

Stakeholder	Question/Comment	Response
Design	Thank you for asking for my comments on the above application, with which I am very familiar, having been involved in pre-application meetings and Quality Review Panels (QRPs) on the site from the start of its journey through the planning system. Location The proposals are located in the Brantwood Road Industrial Estate, which is designated as Strategic Industrial Land in the London Plan and Haringey's Local Plan. This industrial area, alongside a neighbour to its east, occupies the extreme north-eastern corner of the borough of Haringey, in Northumberland Park ward, beside the border with the borough of Enfield. The site sits about mid-way along West Road, which runs north-south, on its west side, a couple of blocks south of its junction with Brantwood Road, which runs west to Tottenham High Road at the northern end of the North Tottenham local centre and east to Watermead Way, which provides easy access to the North Circular. To the south and west, the industrial estate borders residential areas, mainly the existing, often high-rise and high-density, estates of Northumberland Park, allocated in the Local Plan Tottenham AAP for a masterplanned comprehensive regeneration to increase housing, employment and social infrastructure, with the new Tottenham Hotspur Stadium, and its surrounding, rapidly expanding, emerging new town centre of North Tottenham just beyond. To the north, Enfield Council are developing complimentary neighbourhood residential and town centre intensification in Edmonton and a major regeneration area at Meridian Water. Use & Quantum The proposal is for a high quality, specialist, logistics warehouse and offices, for specialist logistics floorspace provider and operator Goya, who have built several other such developments elsewhere in the country. Logistics businesses process and dispatch orders for delivery to both other businesses and consumers, such as Amazon and other online retailers, including traditional retailers expanding into online. Unlike traditional warehouses, goods rapidly turn over, and significant staffing and use of technology is required. There has been a great deal of interest and research in the last couple of years, pioneered by the Greater London Authority, and enthusiastically followed by Haringey, in Industrial Intensification; seeking a move away from low density, vehicle	Support Noted. Condition 3,17,23 attached

	dominated industrial and warehouse buildings employing only a few, to greater building density, greater site coverage, greater height, even multi-storey, with smaller areas of parking and vehicle servicing, better provision of low-carbon access such as electric vehicles, cycling and walking and enhanced, more walkable public realm. The area in general and this site in particular are therefore well suited to significant industrial intensification, and the applicants propose a significant density and increased height over the prevailing one and two storey, low density, light industrial units that dominate the Brantwood Industrial Estate, with a building of 17.8m height (ground floor finished floor level to parapet) housing three high ceilinged floors. There is also a London-wide recognition of increasing need for Logistics, to meet growing demand for deliveries, and this is primarily what these applicants are proposing for this development. Logistics operations can be reminiscent of warehousing, but the applicants have explained that this will be an employment-intensive site with 24-hour operation and many more employed on site than either warehousing or even conventional, single-storey manufacturing. The mix proposed in this development will also contain a significant amount of office space, particularly in the side wing that will span the vehicular entrance, screen the service yard and loading docks from the street and providing a strong, active frontage of a tall, three storey street continuous street wall. The significant amount of office space, as well as further ancillary mezzanine storage that could easily be converted to more office accommodation, is sufficient to consider this scheme as mixed office and logistics space, and represent a more intense use of this site, in line with recommendations. Furthermore, the greater height of the logistics portion of the proposals will allow more efficient automated storage for rapid distribution, as required by the rapidly evolving logistics sector, and is another way in which this proposal represents greater intensity of use than the existing or than typical low-density manufacturing or warehousing. Also, there will also be a prominent double height glazed entrance for office staff, customers and other visitors, improving the proposal's contribution to animating the street frontage. Form, Bulk, Height, and Massing	

	The height of the proposal is considered acceptable in design terms, as the council want to see intensification of protected industrial areas such as this, commensurate with intensification and increased height in major residential and associated redevelopment areas such as the nearby Spurs Stadium and High Road West developments. The site for this development is well away from any existing residential areas and will therefore not have any detrimental impact from loss of daylight or sunlight, impact on microclimate or of views of the proposal. The proposed bulk is a full and frank expression of its size, with no attempt to disguise that. This is also acceptable from a design point of view, as an expression of the council's willingness and expectation to see further intensification of the industrial estate, especially on blocks such as this where there is no detrimental impact on residential neighbours. Furthermore, although the prevailing surrounding height and bulk of the industrial estate is currently predominantly low-rise, this is not the 1st higher and more bulky proposed development, especially for the logistics sector, with the recently completed logistics units at 175 Willoughby Lane a short distance to the north-east and recently approved, currently under construction, Valor logistics developments at two sites on West Road opposite but a short distance to the north and south of this site. Other taller, more intensive recent or current developments in industrial estates nearby include a very recently granted 4-storey workshop on Tarif Road, the next street to the west and a recently completed 7-storey, "Shurgard" self-storage development short distance further away to the east. Notwithstanding the frank expression of the bulk of the proposal, it is to be clearly split into two elements, with the main bulk of the main warehouse volume distinguished from the more slender volume of the entrance & office wing, by means of a slender, full height, glazed slot looking onto the main entrance and each floor's lift/stair lobby and a subtle off-set in the plane of the facade. This responds to two of the recommendations of the Quality Review Panel (QRP), who were overall supportive of this proposal, albeit with a few detailed design suggestions that have all been taken up or responded to by the applicants. Elevational Treatment, Fenestration, Materials & Detailing	

	The architectural character and strategy for elevational treatment of the proposals are contemporary, featuring long ribbon windows in a balanced composition of either vertical or horizontal alignment on the main façade facing the street. These will provide passive surveillance and activate the street frontage with visible activity and overlooking. The whole of the main street frontage, wrapping around the south-eastern corner into the front-most part of the south side elevation, as well as the whole of the office wing and western, are composed of two materials; brick to the ground floor, to reference neighbouring older brick neighbours and provide a robust, weather-proof, impact-proof and vandalism-proof façade where it is closest to pedestrian and vehicular activity, with timber cladding above in accordance with the developer's consistent branding, with high-quality, maintainable, timber cladding featuring as the primary cladding material across all of Goya's developments. On the south side, a full height vertical ribbon window ending in a maintenance/emergency door marks the end of the brick/timber element, whilst to the north, it ends in the internal corner between the office wing and main block. The remainder of the facades of the main block are to be externally finished in profiled metal cladding in a silver-grey finish. This is typical of contemporary industrial architecture, and is compatible with integrated loading bay doors. Junctions between timber/brick and profiled metal are neatly made at full height slot windows or internal corners. High parapets to both wall materials will hide the shallow pitched roofs. Detailing of junctions, parapets, bases (meetings with the ground), windows and doors are robust and will be common details for these different materials, to be confirmed, along with final materials choices including selection of a suitable, interesting brick of varied appearance and buff, red or mixed colour compatible with existing neighbours, in conditions. Landscape and Boundaries The proposals will contain a reasonable area of both staff parking and vehicle delivery, with modern delivery docks suitable for different sized vehicles, for maximum logistics delivery, screened from the street by their proposed office wing.	

	The staff / customer entrance will be directly onto the street, encouraging pedestrian visitors and prioritising them over those arriving by vehicle, with vehicles required to pass through an archway containing overlooked access-controlled gates to get to car parking and delivery bays. In one of the most notable benefits of the scheme compared to typical other industrial, logistics and warehousing developments, the whole of the building frontage onto the street will not be fenced off from the street, but will instead contain a richly planted landscape feature, considerably improving the quality of the public realm along this part of the street. The set-back of the building from the street has also been set-out to ensure the retention of the single existing street tree in the pavement outside of the development site, and potentially allow the planting by the council of additional street trees along this stretch of pavement. Landscaping proposed in the courtyard includes trees around the car park, a modest area of outdoor amenity for staff and cycle parking to improve the greening of the site and its contribution to the public realm, including new landscaping along the street frontage and protection of existing and provision of new street trees. Means of enclosure to other boundaries, to neighbouring properties, including the alleyway along the northern boundary of this site that provides access to a couple of otherwise land-locked industrial buildings behind the application site, and to the south-eastern corner of the street frontage, will be via contemporary, low-visual-impact fencing, to be confirmed in conditions. Conclusions Overall, the proposals for this development are simple, clean and elegant, with high quality landscape designed in, and should encourage the attraction of much needed logistics businesses to this suitable accessible location. They have received on balance general support of the QRP, and similarly receive on balance the support of the design officer	

Stakeholder	Question/Comment	Response
Cllr Bevan	As a Cllr of long standing, I am responding to this application. I have visited the above address, and my comments are below and are based on my observations and local knowledge during my 22 years as a Cllr for this ward and as the Design Champion for Haringey. In addition, I now refer to the MAYOR of London's Planning Guidance 2021. I note that this is a very complex application, so I have reserved my comments to the QRP observations, in particular their many observations concerning materials. I am requesting that all their observations on this issue are implemented. The industrial estates in this area are to put it bluntly a disgrace in their detrimental aspect that they add to the local streetscape, so our policy of improved design etc for all future such projects, very profitable projects in the current environment, is to be enhanced by the input of our QRP and implementation of their recommendations. A final submission to the QRP panel ?	QRP comments have been noted and addressed by the applicant. QRP comments have been attached to the appendix of the report.

Stakeholder/External	Question/Comment	Response
Transport for London	Thank you for consulting TfL Spatial Planning Given the location of the scheme away from TfL highways and assets we have no significant comments to make. We welcome that the Healthy Streets Transport Assessment has undertaken an Active Travel Zone assessment. We note that landscaping and amenity seating will be included to the eastern boundary, fronting West Road, to improve the development's relationship with the public realm and adding a enhancement to green infrastructure, and to increased West Road pavement width Haringey Council will need to assess whether the distance from the highway to the gates across the service yard is satisfactory to avoid vehicles waiting to enter the site obstructing the pavement, and also to assess sightlines for drivers and pedestrians the covered entrance where it adjoins the pavement. 2Any physical or information mitigation measures will be required to be delivered. A S278 Agreement will be required with Haringey Council for all highway works to remove and replace highway accesses. In line with the Active Travel Zone assessment, TfL would support Haringey Council to secure measures and a financial contribution to improve access and footways immediately around the sites, and on access routes to the site, and improving on street waiting and loading restrictions. This would continue Haringey Council's management of existing highway and parking issues occurring along West Road and Brantwood Road. Please feel free to contact me if you have any queries with which I can assist. Otherwise TfL would not object to permission being granted.	Supported Noted. Condition and obligations attached.

Stakeholder	Question/Comment	Response
Environment Agency	Thank you for consulting us on the above application on 26 March, 2025. Environment Agency position: Whilst we have no objections to this application, we would like to draw your and the applicant's attention to the following advisory comments. Advice to Local Planning Authority: Flood risk standing advice The proposed development falls within Flood Zone 2, which is land defined in the Planning Practice Guidance as being at risk of flooding. We have produced a series of standard comments for local planning authorities and planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. Your proposal falls within this category. These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at https://www.gov.uk/guidance/flood-risk-assessment-for-planningapplications#when-to-follow-standing-advice We recommend that you view our standing advice in full before making a decision on this application. We do not need to be consulted. Flood mitigation Although we have no objections to the proposed development, the developer may wish to include measures to mitigate the impact of more extreme future flood events. Measures could include raising ground or finished floor levels and/or incorporating flood proofing measures. Further guidance on preparing properties for flooding can be found at https://www.gov.uk/government/publications/prepare-your-property-forflooding. Sequential Test What is the sequential test, and does it apply to this application? In accordance with the National Planning Policy Framework (paragraph 174), development in flood risk areas should not be permitted if there are reasonably available alternative sites, appropriate for the proposed development, in areas with a lower risk of flooding. The sequential test establishes if this is the case. Development is in a flood risk area if it is in Flood Zone 2 or 3, or it is within Flood Zone 1 and your strategic flood risk assessment shows it to be at future flood risk or at risk from other sources of flooding such as surface water or groundwater.	Support Noted. Pollution Team has been consulted condition 4,5 and 6 attached.

	The only developments exempt from the sequential test in flood risk areas are: • Householder developments such as residential extensions, conservatories, or loft conversions • Small non-residential extensions with a footprint of less than 250sqm • Changes of use (except changes of use to a caravan, camping or chalet site, or to a mobile home or park home site) • Applications for development on sites allocated in the development plan through the sequential test and: o the proposed development is consistent with the use for which the site was allocated; and o there have been no significant changes to the known level of flood risk to the site, now or in the future, which would have affected the outcome of the test Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures such as flood defences, flood warnings and property level resilience. Who undertakes the sequential test? It is for you, as the Local Planning Authority, to determine an appropriate area of search and to decide whether the sequential test has been passed, with reference to the information you hold on land availability. You may also ask the applicant to identify any other 'reasonably available' sites which are on the open market and to check on the current status of identified sites to determine if they can be considered 'reasonably available'. Further guidance on the area of search can be found in paragraphs 027-030 of the Planning Practice Guidance here. What is our role in the sequential test? We can advise on the relative flood risk between the proposed site and any alternative sites identified - although your strategic flood risk assessment should allow you to do this yourself in most cases. We won't advise on whether alternative sites are reasonably available or whether they would be suitable for the proposed development. We also won't advise on whether there are sustainable development objectives that mean steering the development to any alternative sites would be inappropriate. Further guidance on how to apply the sequential test to site specific applications can be found in the planning practice guidance here. Contaminated Land	

	This development site appears to have been the subject of past industrial activity which poses a risk of pollution to controlled waters. However, we are unable to provide site-specific advice relating to land contamination as we have recently revised our priorities so that we can focus on: • Protecting and improving the groundwater that supports existing drinking water supplies • Groundwater within important aquifers for future supply of drinking water or other environmental use. We recommend that you refer to our published 'Guiding Principles for Land Contamination' which outlines the approach which should be adopted when managing this site's risks to the water environment. We also advise that you consult with your Environmental Health/Environmental Protection Department for advice on generic aspects of land contamination management. Where planning controls are considered necessary, we recommend that the environmental protection of controlled waters is considered alongside any human health protection requirements. This approach is supported by paragraph 187 of the National Planning Policy Framework. The control of emissions from Non-Road Going Mobile Machinery (NRMM) at major residential, commercial or industrial sites Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority. This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support Local Planning Authorities and developers in improving and maintaining local air quality standards and support their net zero objectives.	

	We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority. The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit. Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied. Advice to applicant: Water resources Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants. Commercial/Industrial developments We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. ‘major’ developments) should achieve the BREEAM ‘excellent’ standard for water consumption (category ‘WAT 01’), or equivalent. This standard	

	may already be a requirement of the local planning authority. We also recommend you contact your Local Planning Authority for more information. Signing up for flood warnings The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning or visit https://www.gov.uk/sign-up-for-flood-warnings. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email, or text message. Anyone can sign up. Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families, and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities. For practical advice on preparing for a flood, visit https://www.gov.uk/prepare-forflooding To get help during a flood, visit https://www.gov.uk/help-during-flood For advice on what do after a flood, visit https://www.gov.uk/after-flood Final comments Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence.	

Stakeholder	Question/Comment	Response
Secure by Design	Thank you for allowing us to comment on the above planning proposal, please find our representation for the above application to London Borough of Haringey Section 1 - Introduction: With reference to the above application, we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1). At this stage we have not met with the original project Architects to discuss Crime Prevention and Secured by Design at pre-application stage to discuss our concerns regarding the design and layout of the development. There is however a Security Needs Assessment that references Designing out crime and CPTED principles. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at the earliest opportunity . At this point it can be difficult to design out fully any issues identified, at best crime can only be mitigated against, as it does not fully reduce the opportunity of offences. Whilst in principle we have no objections to the site, in light of the changes to the original design we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.	Support Noted. Condition 11 attached.

	This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to Section 2 - Secured by Design Conditions and Informative: In light of the information provided, we request the following Conditions and Informative: Conditions: A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development. The development shall only be carried out in accordance with the approved details. B. Prior to the first occupation of each building, or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained. Reason: In the interest of creating safer, sustainable communities. Informative: The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813. Section 3 - Conclusion:	

	We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind. Should the Planning Authority require clarification of any of there commendations/comments given in the appendices please do not hesitate to contact us at the above office. This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to Appendix 1: Concerns and Comments In summary we have overall site specific comments in relation to the following items. This list is not exhaustive and acts as initial observations based on the available plans from the architect and local authority planning portal. It has been noted that there have been several meetings with minutes and recommendations documented by the architects which facilitate early pre-application advice given by our department. Should this advice be taken, then SBD accreditation will be achieved. Site specific advice may change depending on further information provided or site limitations as the project develops: This list is not exhaustive and acts as concerns raised during consultation with the architects preapplication. Note - That the pre-application phase concentrated on the design of the layout of the development, the following also provides the material aspect of the physical target hardening requirements to achieve Secured by Design accreditation and this has not been discussed in detail with the architects or developers. Site specific advice may change depending on further information or site limitations as the project develops:	

	A- Boundary Treatment Height Ideally side and rear boundary onto the public realm should be 2.4m with weldmesh fencing Fencing Material Metal Metal fabrication, should be robust, have an unfinished top rail (exposed tops), to deter loitering, sitting and climbing. Railing Fencing All perimeter railings to have a maximum 50mm spacing centre to centre, be set flush to the front of any wall. If strengthened with mid rail must be designed to deter climbing and mid rail to be inward facing. Gating Designed level to the front building line, any locking mechanism, hinges to be anti-climb and fitted with a dampened stop. Gating to be inclusive of a self-closer and the same height as the perimeter treatment including any trellising. Recess Where possible building lines should be flush to allow natural surveillance, any recesses should not exceed 600mm. Anti- Climb If anti-climbing measures are introduced then signage should be used to comply with Occupiers Liability Act 1984. Fencing Type Any boundary treatments should be UKAS certified as recommended by a DOCO Low Height boundaries All low defensive wall/railings to be designed to deter sitting, loitering and climbing. Access Control This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to Access Control Access control at the vehicle and pedestrian entrances is required to maintain security in communal areas and the courtyard. All panels to have audio/visual capability.	

	Access Panel Access control panels (anti-vandal) should achieve the Secured by Design required standard – UL293. Trades Button No Trades Button on control panel Audio/Visual Entry (Camera) DDA (Part M) compliant camera alone is insufficient for first entry door. Primary camera location on access control panel to be considered to capture all visitors. Secondary camera will be required to the side/height that provides the resident a clear image of the visitor. Data Retention Fob Access Data retention of access control activations should be utilised throughout the site with the facility to store data for one calendar month before over writing. This data should be available to Police within 24 hours for evidential purposes should it be required. *Consideration to be given to appropriate and sufficient hard drive storage* Integrated (Part B/ ADQ) Compliance Access control systems should be Integrated to utilise both fire and security systems. Emergency Release (Push To Exit) Vehicle gate should be fob both ways with no induction plate and pedestrian gate should be access controlled for both residents and visitors. Plant Room/ Service Rooms All service/plant door set/s accessible by public realm are required to be one of the following UKAS certified products subject to a crime risk assessment by a DOCO: LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or STS202 Issue 3:2011 BR 2+ or LPS2081 SR2 B+ or	

	Equivalent certification * Service/plant door/s should be self-closing, self-locking single doors* Pedestrian & Vehicular Gates Access controlled external pedestrian and vehicular gates that provide entry to the development should be accredited to LPS1175 SR2 or equivalent and include Magnetic locks - 2 x 500kg (minimum) resistance (1200lbs/psi) placed a third from the top and a third from the bottom. Vehicle gate to the undercroft should be full height Designed level to the front building line, be anti-climb and fitted with a dampened stop. Internet Of Things (IoT) Due consideration to be given to the security/risk management to access control systems dependent upon how they interact with IoT. Fire Access - Gates DropKey Protection Box(DPB) If the cause and effect of a fire over ride switch (FOS) activation poses a crime risk consideration to a Drop Key Protection Box should be made. The project fire consultant should be made aware of any Part B Security v's Safety conflicts https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/drop-key-protectionbox-(dpb).aspx This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to Doors	

	Recessed Areas Any recesses should not exceed 600mm, but consideration can be given to the Disability Discrimination Act (DDA) requirements. Be advised further by borough occupational therapist. All external door set/s accessible by public realm are required to be one of the following UKAS certified products subject to a crime risk assessment by a DOCO: LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or STS202 Issue 3:2011 BR 2+ or LPS2081 SR2 B+ or Equivalent certification * Door/s should be self-closing, self-locking single doors* Postal Strategy Mailboxes Mail is normally delivered into the main lobby of a commercial buildings during operating hours. If external boxes are to be used then is should preferably be fixed to the external face of the building. External post boxes should be covered by CCTV and meet TS009 standards or MPS robust mailbox specification. Windows Accessible Windows & Roof Lights All easily accessible windows (anything under 2m from another surface treatment) should be certificated to either: *PAS24:2016 with BS EN356:2000 min. P2A glazing (consider P3A) *STS204 Issue 6:2016, *STS202 Issue 7:2016 Burglary Rating 1 *LPS1175 Issue 7.2:2014 Security Rating 1 or *LPS1175 Issue 8:2018 A1 Security Rating 1 or *LPS 2081 Issue 1.1:2016 Security Rating A.	

	Accessible windows includes any glass reached by climbing any number of floors via rain water pipes, balconies or via communal walkways (whether walkway accessed through secure door or not) Glazed Apertures All glazing in and adjacent to: *Residential, communal, front, back doors and ground floor windows *Communal windows that are easily accessible above ground floor level Should incorporate security glazing to the equal standard of the agreed door specification. Lockable Window Handles Any window within 2m of an accessible surface should have key operated locks. Where windows form an escape route, Part B (Fire) compliance should be adhered to. All ground floor, vulnerable and accessible windows must have a lockable window restrictor to prevent unauthorised access. Access control Access Control Layers Vehicle gate – Access controlled entry via reception or the main office Pedestrian Gate – Fob access for staff Main entrance door – Access control via Audio visual access control with fob entry for employees Secondary communal doors (off stair cores) – fob access control for employees with either audio visual access control or “meet and Greet” for visitors CCTV CCTV can be used to support access control measures where access is gained into communal areas such as the rear courtyard and the undercroft This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to	

	Cycle Stores External Cycle and Bulk Storage Positioned as not to provide climbing aids to other vulnerable areas such as accessible window/s, door/s, balconies, flat roofs and podiums. Cycle Storage Lighting Cycle storage lighting is required in all stores. In areas of no natural light or hours of darkness, a constant level of lighting is required for illumination. Connected lighting to provide low level lighting during inactivity and higher light levels when motion is detected. CCTV CCTV must be installed around in cycle stores in public areas. Should have unhindered views of the racking at all times and should be vandal resistant. Locking Points There should be 3 locking points for cycles on the racks/stands provided. Cycle racking should be secured with anti-tamper fixings Viewing Panel Cycle store doors should allow light spill from with-in, either a small obscured viewing panel or robust louvre (as part of the door set). Internal Signage Ideally signage should be placed inside the store to reinforce importance of securing cycles by residents. Lighting Public Realm lighting Whether adopted highways/footpaths/private estate roads or car parks should meet BS 5489:2020 standard. Declaration of Conformity Should be overseen by an independent and competent lighting engineer. They should be qualified to at least ILP Level 3 or 4 in line with the latest SBD guidance. Internal lighting	

	Communal elements of any scheme, ideally should be a controlled by a photo electric sensor. This to ensure suitable levels of lighting at all times. Where no natural light is available two phased lighting can be used (low level for non-activity, higher level once movement is detected) Lux levels Lux is the measurement of light reaching a surface (1 lux is the light emitted from one candle that is 1m away from a surface 1sqm). Examples of suitable Lux levels are listed below: • Office interior (security) 05 Lux • Private car parks 10 Lux • Exterior Rural location 10 Lux • Exterior Urban location 20 Lux • Walkways 30 Lux • Loading bays 50 Lux Further guidance is available in the “Lighting against crime” manual. This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to Uniformity (Uo) The even distribution of light across the area being illuminated. A good lighting system is one designed to distribute an appropriate amount of light evenly with uniformity and should include the following: • Values of between 0.25 and 0.40 • Using lamps with a rating of at least 60 (minimum) on the Colour Rendering Index. • Good lighting will use energy efficient lamps in suitable luminaries. Dusk-Till-Dawn Lighting Lighting, where possible should consist of white light which is evenly distributed In Communal areas:	

	• All entrances should have dusk till dawn lighting supported via a photo electric cell. Allowing lighting to controlled automatically. On Residential units: • All residential entrances (front, back, side doors) should also have dusk till dawn lighting, via a photo electric cell with a manual override. Allowing residents/the user local control. Bollard lighting Shall be avoided due to its history of vandalism and ease of been covered over. Up lighters and decorative lighting can be used but only in unison with columns providing the required standards of light for good clear facial recognition illumination. Directional lighting Can be used to support pedestrian routes. Should robust and vandal resistant and be part of n overall lighting strategy (as shown above) Directional lighting should not be a standalone solution to illumination. Gates Gate/s Ideally gated full height or with infill panels above. Access control and gate/s to be as close to the forward building line as possible. There should be minimal gap beneath the gate. Designed to deter or prevent climbing. Any gate design to be submitted and approved by DOCO Ironmongery All gates should be fitted using anti tamper proof hinges. All hinges and brackets must be fitted in such a way so as not to create a climbing aid. Push to Exit Egress button to be minimum of 1.5 metres away from gate and fully shrouded. Any associated cabling to be out of sight. Pedestrian Gate/s Designed to deter or prevent climbing. All pedestrian gates to have a minimum of 2 x 500kg resistance magnetic locks. Ideally positioned 1/3 from top and 1/3 from bottom. To be single leaf, self-closing and self-locking. Climbing Points Rain Water Pipes External rain water pipes should be square/rectangular, flush to the wall or recessed – if	

	round they should be shrouded up to 3m minimum from ground level and have close/flush fitting brackets. Balcony to Balcony Vulnerabilities Consideration should also be given for opportunities to climb balcony to balcony both up and across Balustrade should be secured to the floor of the balcony and flush to the front removing any vulnerable grip points. This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to Balconies and adjacent features Consider vulnerability of balconies by boundary walls along with • Trees. • Door canopies. • Street furniture. • Neighbouring properties. • ACB and utility meters. • Any outbuildings such as cycle and refuse store. • Vehicles in parking areas. Utility Meters Utility Meters All utility meters should be positioned where possible in external risers or cupboards removing the requirement for an official to enter the building to read them. Smart meters should be the default requirement for all developments. Management Plan If utility meter is to be located within residential unit representatives must have a scheduled appointment made with the concierge or Management Company to gain access to the building. Car Parking Location Positioned as close as possible to buildings and overlooked by active windows. Should not be located close to boundary walls allowing vehicles to be used	

	to climb into properties. Lighting Should be well lit to the latest standard of BS5489 (consider Park Mark guidance) https://www.britishparking.co.uk/write/Documents/safer%20parking/SPS%20New%20Build%20Guidelines%20-%20web%20version.pdf Alarm / C.C.T.V Alarm Consideration If an alarm is to be installed should meet BS EN 50131 (as minimum) which can include wireless systems. If an alarm is not fitted installers should provide a labelled 13amp fused spur on consumer unit for future use. https://www.policesecuritysystems.com/ This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to CCTV Installation Please note where a development requires CCTV, this facility is to compliment other security measures, not to replace them. As a minimum police recommend coverage of the following areas: • Entrance & exit points including secondary coverage of call points, • Foyer / Lobby areas, • Post boxes and Postal rooms, • Cycle stores, • Refuse stores, • Underground or covered parking areas, • Top of stair cores	

	Due consideration to be given to other areas suitable for CCTV throughout the development as part of a site specific risk assessment. Quality Should be of good facial recognition and colour HD quality in both daylight and night vision. Storage & Access • Footage should be preserved for a minimum of 31 days. • Any CCTV system that captures footage of public areas must comply with the regulations outlined by the Information Commissioner's Office. • To be stored securely on a remote cloud system, or on a locked and secured hard drive i.e. within a secure area behind a PAS24:2016 door or SR1 lockable steel cabinet. • Police access to footage must be within a minimum of 24 hours and a maximum of 48 hours for evidential purposes. Party Walling Communal to Apartment Walling Preferred System Light weight framed walls either side of a secure door set (including 600mm around the whole door set) and partitioned walls between two dwellings or communal space shall meet the requirements below: • LPS1175 (Issue 7.2) SR1 • LPS1175 (Issue 8) SR1/A1 • STS202 Issue 7 BR1 Apartment to Apartment Party Walling Alternative All avenues must be explored to meet the standards above, however the following are potential alternatives if the above cannot be achieved. To be agreed by DOCO.	

	• E-WT-2 Timber Wall • E-WS-3 Light Steel Wall • E-WM-20 Masonry Wall Installation of 9mm (min) timber sheathing or expanding metal in the areas concerned. Wherever possible C-Studs should have 300mm staggered centres. Public Realm & Landscaping Landscaping Scheme A full landscaping scheme plan should be submitted and discussed with the DOCO. Sight lines • Bushes and shrubs maximum 1m high. • Trees should a canopy height of 2m minimum and maintained to allow clear sight lines. • Landscaping and trees, should be designed to complement CCTV or lighting plans with long term maturity a consideration. This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to Defensive Planting Used to create distance from vulnerable areas such as patios, balconies and windows. The usage of defensive planting can complement perimeter boundaries. Defensive planting recommendations: • Plants with flowers for aesthetics and to deflect harsh appearance. • To be mature planting from installation and reach a maximum height of 1m where sight lines need to maintained. Depth of planting will be site specific recommendations. • Positioned beneath windows and next to fences to deter potential offenders. • Require regular maintenance to prevent getting overgrown.	

	• May require signage to warn of risk of injury (Occupiers Liability Act). Appendix 2: Planning Policy London Plan 2021 Policy D11: Safety, Security and Resilience to Emergency This policy links design out crime, counter terrorism prevention measures and acknowledges fire safety issues. Section B of policy D11 Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans. Section C of policy D11 These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. The policy considers not just crime, but also a wide range of hazards, such as fire, flood, extreme weather and terrorism. New buildings should therefore be resilient to all of these threats. Paragraph 3.11.3 Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police…. This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one. Paragraph 3.11.4	

	The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised. Paragraph 3.12.10 Fire safety and security measures should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and means of escape or access of the fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues. DMM4 (Policy DM2) Part A(d) "Have regard to the principles set out in 'Secured by Design'"This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to DMM5: Para 2.14 - "Proposals will be assessed against the principles of secured by design'. The latest published guidance in this respect should be referred." An Independent Sustainability report by AECOM on Tottenham area action plan states: "Crime is high in Tottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly associated with Northumberland Park and Tottenham Hale". 12.3 of same report states: • Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduces levels of crime, fear of crime and antisocial behaviour. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development. • There are no references to crime in the overarching policies, although it is recognised that housing and economic polices aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality	

	environments and more stable communities. AAP 06 includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places. • There are no references to crime in the neighbourhood area sections; however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard. Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated. • In conclusion, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest. Appendix 3 : Crime Figures The crime figures provided below are publicly available on the Internet at http://www.met.police.uk/. The figures can at best be considered as indicative as they do not include the wide variety of calls for police assistance which do not result in a crime report. Many of these calls involve incidents of anti-social behaviour and disorder both of which have a negative impact on quality of life issues. Haringey is one of 32 London Boroughs policed by the Metropolitan Police Service. It currently has crime figures above average for the London Boroughs and suffers from high levels of crime and disorder to its residents and business communities. The following figures relate to recorded crime data from Police.uk for the below area:	

Whilst we cannot provide information down to street area the above information does indicate the level of ASB and associated crime that is typical for the ward, which should be a consideration when designing a development to ensure the reduction in fear of crime as well as crime itself.

Anti-Social Behaviour (ASB)
Particular attention must be drawn to the most prevalent type of incident that will be experienced – Anti-Social Behaviour (ASB). This category covers a multitude of types of incident that can range from what appears quite trivial annoyance to serious criminal acts. Often victims are able to shrug off the minor incidents and do not have the time or energy to report every occurrence, however en mass these create a significant problem.
Research by Ward, Thompson and Tseloni (2017) which was quoted in the victim commissioners report on
ASB in 2019 stated:
Less than a third of ASB incidents were reported to the three main reporting agencies - According to the 2015/16 CSEW, approximately 31% of ASB incidents were

	reported to the police, local authority or housing association/private landlord. Of those reported, most were reported to the police (of all agencies). It is therefore reasonable to assume that the statistics regarding ASB misrepresents the true scale of the problem – the actual figure of incidents is likely to be well over 32 incidents of ASB per month. Incidents of robbery (cash theft from customers) have occurred in this area with local cash and carry warehouses and must be taken into consideration as a crime risk when implementing the designs for this development.	

Stakeholder	Question/Comment	Response
Thames Water	EXTERNAL Thames Water With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Noted informative attached. Stakeholder Question/Comment Response Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/ working-near-our-pipes The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes Should you require further information please contact Thames Water.	Support Noted and Informatives attached

	Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance Stakeholder Question/Comment Response activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Water Comments There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9	

	litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.	

APPENDIX 4 QRP REPORT 22ND JANUARY 2025

CONFIDENTIAL

Haringey Quality Review Panel

Report of Intermediate Site Review: 37-39 West Road

Wednesday 22 January 2025
Alexandra House, 10 Station Road, London N22 7TY

Panel

Esther Everett (chair)
Lucas Lawrence
Neil Mathew

Attendees

Sarah Madondo	London Borough of Haringey
John McRory	London Borough of Haringey
Saloni Parekh	London Borough of Haringey
Tania Skelli	London Borough of Haringey
Catherine Smyth	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Tom Bolton	Frame Projects
Bonnie Russell	Frame Projects

Apologies / copied to

Suzanne Kimman	London Borough of Haringey
Rob Krzyszowski	London Borough of Haringey
Elizabetta Tonazzi	London Borough of Haringey
Bryce Tudball	London Borough of Haringey
Kirsty McMullan	Frame Projects

Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation, Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

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1. Project name and site address

37-39 West Road, Tottenham, London N17 0RE

2. Presenting team

Aaron McCaffrey	PRC
Chris Malone	PRC
Jim Bryan	Goya Developments

3. Planning authority briefing

The site is approximately 0.71 hectares, situated in an established industrial area. It is occupied by the F&J Arpino Wholesale building on the western side of West Road, used for storage and commercial purposes, and is surrounded by large-scale employment buildings, primarily with industrial and commercial uses. The site and surrounding area are designated as a strategic industrial location in Haringey's Local Plan and the London Plan.

The proposal is for the demolition of the existing building and redevelopment of the site to create approximately 6,273 m² of employment floorspace. The development would include a single standalone building, with ancillary office space and associated service yards, car parking and landscape.

Officers asked for the panel's views in particular on greening and amenity space; choice of materials; how activation can deliver a more pedestrian-friendly street frontage; how fencing can be reduced to a minimum, and designed to be attractive; and whether recent innovations in multi-storey factories and stacking warehousing could be implemented.

4. Quality Review Panel's views

Summary

The panel thinks that the proposals have the potential to create a building of an appropriate quality, but makes recommendations on key issues including massing, architecture, materials, landscape and access.

A clearer distinction between the warehouse and the offices is needed to simplify the overly complex West Road façade, including moving the warehouse element back from the offices, and expressing the different functions more clearly in the façade. Work is needed to develop important corner elevations. A more varied roof profile could be considered. The panel also encourages thinking on how the building can relate and respond to surrounding and forthcoming development. The window above the main entrance should be reduced in size, and the position of the entrance reassessed. More design work is needed to ensure the ground floor experience showcases public functions, with larger windows and more design detail. Signage should be designed into the façade. Materials should be simplified, with brick potentially framing entrances and larger areas of timber. The cladding appears too dark, and a lighter shade is recommended. The appearance of weathered timber should be tested.

The panel asks for adjustments to the building line to create a more generous pavement space. All opportunities should be taken to green the site, with climate-resilient planting. Discussions should be held with Haringey officers on how extra street trees can be planted as part of the scheme. The area around the rear entrance should be more pedestrian and cyclist friendly, with planting, and trees in the yard area. Steps should be removed from the front entrance to provide equitable access. Tests are needed to ensure the vehicle entrance is safe for pedestrians.

These comments are expanded below.

Overall approach

- The panel thinks that the proposals include a number of positive strategic decisions. These include using a high proportion of the site; designing the building with an office fronting onto the street; avoiding palisade fencing; and the design of vehicle access route to the yard at the rear. However, it thinks aspects of the proposals should be improved to ensure the building achieves the high level of design quality required.

Massing and architecture

- The panel thinks the junction between the warehouse and offices is uncomfortable, and that the two should parts of the building should be distinguished more clearly from one another. The warehouse could be moved back a couple of metres from West Road, so its massing appears subservient to that of the office building.

- The panel also thinks that the design of the main façade fronting onto West Road is overly complicated, and should be simplified. It asks the design team to consider how the architecture can achieve this by express the building's two different functions more clearly. Architectural treatment could follow the building form more closely, fully representing the warehouse space in the West Road frontage, potentially using the entrance as a vertical strip to separate it visually from the offices.

- The building would also benefit from more thinking on how to express the corner elevations. Corners are important in views along West Road, and more design development is needed to consider how they will appear, and ensure they make a positive contribution to the street.

- The panel also notes that the character study of surrounding buildings reveals a range of different roof profiles. However, the design team has chosen a continuous flat roof. This decision could be revisited to add extra character and interest to the building with a more distinctive design.

- The panel asks for thinking on how the new building will appear as part of the streetscape. Designs should be developed in the context of the surrounding buildings, and should respond to the new buildings under construction opposite, so they read well together.

Main façade

- The panel suggests that the large central window above the main West Road entrance seems overpowering, because it is much larger than pedestrian scale. It encourages the design team to break down the scale of the entrance, potentially considering locating on the corner of the building instead.

- The panel recommends putting more investment into design detail on the main façade at ground floor level, as this will be the part of the building most people interact with. The office windows seem small and could be increased in size. More texture could be introduced through design detail at ground floor level, with a simpler above higher up the building.

- If the ground floor could be a showroom, the façade treatment should reflect this potential use. The treatment could be closer to the entrance windows , offering more to the street than the current domestic-sized windows, which also complicate the architecture by introducing an additional style.

- The panel recommends designing space signage into the treatment of the main elevation, to provide more control over how it is delivered when tenants move in.

Materials

- The use of four different materials compares unfavourably with previous industrial buildings commissioned by Goya Developments using fewer

materials, which are simpler and more successful. As part of simplifying the main façade, the panel asks for thinking on how the material approach can be simplified by reducing the number of different materials.

- The use of timber in small strips is also less successful than previous buildings which have incorporated larger timber areas. Smaller areas appear more residential than industrial.

- The panel likes the use of brickwork as a London-specific design reference, which also provides robust protection around the vehicle entrance. Opportunities should be examined to use brickwork more extensively to frame entrances, for example the vehicle entrance.

- The panel suggests that RAL 7016 cladding is too dark a shade of grey. Silver cladding could be considered instead, which would help the brickwork to stand out more.

- The panel also asks for more information to be provided to officers showing how timber has weathered on previous buildings, to help them understand how its colour will sit alongside the cladding as part of a coherent palette.

Landscape and public realm

- The existing building is set back from West Road, as are other buildings on the street. The proposals place the new building closer to the pavement, making it a more prominent feature in the streetscape and reducing space for pedestrians. The panel asks for thinking on how the position of the building can be adjusted to a create more generous pavement space – without necessarily removing the proposed planting, which is welcome. This will be particularly important to accommodate match day foot traffic to the Tottenham Hotspur Stadium.

- The panel welcomes the proposed green roof, but asks for more work to develop landscape proposals. It thinks the current proposals are too limited given the size of the site, which provides extensive opportunities for greening. It encourages further thinking on what can be done to maximised greenery.

- Planting should be carefully selected to ensure it is climate resilient, and drought-proof.

- Opportunities include more street greening. Planting more large trees in addition to retaining the existing street tree would be particularly beneficial. The panel encourages discussions with Haringey officers on how street trees could be delivered, and coordinated with the trees planned as part of the development opposite.

- The panel thinks the area outside the rear entrance should be designed as a more pedestrian and cycle-friendly space. A buffer of planting could be used to differentiate it from the parking area.

- The panel also suggests that the rear entrance could be more generous, with a larger, less domestic door more in keeping with the front door.

- There is also scope to plant trees in the rear yard area, helping to provide views of greenery for offices in the building to both front and back.

Access

- The panel emphasises the importance of ensuring equitable disabled access to the building. The steps leading to the main entrance should be removed to ensure level access to the main entrance.

- It is important to ensure there is enough intervisibility between pedestrians and vehicles to ensure the entrance to the service yard is safe. Designs should be tested and adjustments made if needed to minimise risk where vehicles cross the pavement.

Next steps

The panel is confident that its comments can be addressed in discussion with officers.

Appendix: Haringey Development Management DPD

Policy DM1: Delivering high quality design

Haringey Development Charter

An 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. The Council will support design-led development proposals which meet the following criteria:

a Relate positively to neighbouring structures, new or old, to create a harmonious whole;
b Make a positive contribution to a place, improving the character and quality of an area;
c Confidently address feedback from local consultation;
d Demonstrate how the quality of the development will be secured when it is built; and
e Are inclusive and incorporate sustainable design and construction principles.

Design Standards

Character of development

B Development proposals should relate positively to their locality, having regard to:

a Building heights;
b Form, scale & massing prevailing around the site;
c Urban grain, and the framework of routes and spaces connecting locally and more widely;
d Maintaining a sense of enclosure and, where appropriate, following existing building lines;
e Rhythm of any neighbouring or local regular plot and building widths;
f Active, lively frontages to the public realm; and
g Distinctive local architectural styles, detailing and materials.