

From: Shreekant Patel

Sent: 21 August 2026 15:26

To: Kwaku Bossman-Gyamera

Subject: FW: HGY/2026/0754 – 11 High Cross Centre, Fountayne Road (Minor) - Carbon Comments

Kwaku,

Thank you for your email and attachments.

Transport comments as follows:

1. Updated L&B Plans: It is noted that the site 'red line' has been amended to include a strip pf carriageway along the site frontage. Please verify site ownership boundary with land registry records.
2. Transport Statement:
 - a. The application form indicated the following:

Please add details of the Gross Internal Area (GIA) for all current uses and how this will change based on the proposed development. Details of the floor area for any proposed new uses should also be added.

Use Class:

B8 - Storage or distribution

Existing gross internal floor area (square metres):

2774

Gross internal floor area lost (including by change of use) (square metres):

1470

Gross internal floor area gained (including change of use) (square metres):

0

Use Class:

E(g)(ii) - Research and development - Except where not suitable in a residential area

Existing gross internal floor area (square metres):

0

Gross internal floor area lost (including by change of use) (square metres):

0

Gross internal floor area gained (including change of use) (square metres):

1309

Use Class:

E(g)(iii) - Industrial processes - Except where not suitable in a residential area

Existing gross internal floor area (square metres):

0

Gross internal floor area lost (including by change of use) (square metres):

0

Gross internal floor area gained (including change of use) (square metres):

1309

Total	Existing gross internal floorspace (square metres)	Gross internal floor area lost (including by change of use) (square metres)	Gross internal floor area gained (including change of use) (square metres)
	2774	1470	2618

The Transport statement indicates:

i. The Site comprises of a Class B8 / E(g)(iii) warehouse that has a gross floor area of approximately 1,550sqm. The proposals associated with this application include extending the first floor along with the construction of a second floor to provide 30 units with a combined gross floor area of approximately 3,048sqm including ancillary accommodation as illustrated on the plans at **Appendix A**. Units 1-16 would be located on the first floor with Units 17-30 on the second floor.

ii. The proposals associated with the application include a reconfiguration of the ground floor along with extending the first floor and the construction of a second floor to provide 30 units increasing the overall floor area by 1,498sqm to 3,048sqm as illustrated on **Figures 4.1, 4.2 and 4.3** with a copy of the application plans in **Appendix A**.

iii. Trip Generation

4.6 The proposals include the reconfiguration of the ground floor along with extending the 1st floor and the construction of a new 2nd floor to create an additional 1,498sqm of flexible Class E employment floorspace, with a total of 30 units varying in size from 36sqm to nearly 80sqm.

Overall, it is estimated that the fully occupied Site (3,048sqm) could employ between 70 and 100 people.

I have not been able to reconcile the different floor areas indicated and therefore request clarification before commenting further on Trip generation assessment. Presently. My limited comments are as follows:

- that further consideration will be required regarding 'Census Travel to Work' car mode share of 36% applied to 100 employees and resulting in the demand for car parking exceeding the proposed provision of 11 car park spaces. Consequently, justification for proposed car parking and wider parking stress surveys and assessment are required to identify and quantify impacts.
 - The significant difference in size of proposal compared to significant range and sizes of selected of TRIC sites require further review. Please provide full details of trip rates vs size of development to assess whether the use of average trip rate is acceptable. Please provide full TRICS data for each selected site and analysis of the trip rate variability by size.
 - The reference to 'not all units being occupied' is not accepted in the absence of any corresponding details demonstrating that each selected Trics data site was either fully or partially occupied.
 - Please clarify use of Ground Floor – will this floor be occupied by a single separate tenant from those occupying 28 units on floors 1 and 2.
- b. Public Transport Accessibility: The assertion that the site should be consider as having very good public transport accessibility is not accepted because the proposed development would then have to be car free to comply with London Plan parking standards. Consequently, further consideration is required regarding suitability of site location for proposals in context of Policy DM31.
- c. Assessment of demand / accumulation for car parking is required – based on hourly arrival and departure of person trips and 36% car mode share for Travel to Work.
- d. Provision for 'Blue Badge' holder parking spaces should consider Census statistics for percentage of working age population with 'Blue Badge' and revised accordingly.
3. Parking Management Plan:
- a. There is very little detail regarding how car parking will be allocated other than it will be based on 'need'. It is not clear what that means and whether 'need' will be assessed daily or some other time period.
 - b. Given the initial indication from the Transport statement is that paring demand will exceed parking capacity – details of how that will be managed should be provided.

- c. Further details are required regarding the allocation and management of parking spaces to occupiers in context of proposed 28 individual units.
- d. Please clarify whether any parking permits issued would allow cars to be parked within the wider estate and/or area covered by CPZ.

4. Delivery Management Plan:

- a. There is very little detail regarding how the 5-6 deliveries / day has been determined – given the occupation of 28 separate units on site.
- b. Additional details should be provided regarding the combined demand and use of shared yard to the rear of 11 High Cross.

5. Travel Plan:

- a. Travel Plan Aim Target for reducing car mode share from 36% to 26% and correspondingly increasing walk/cycle mode share from 11% to 21%, is not considered practical without first demonstrating where the full car parking demands will be accommodated.
- b. Travel surveys and monitoring will require use of 'Modeshift'. A s106 agreement will be necessary to secure payment of £3000/year Travel Plan Monitoring fee.
- c. An explanatory Note / demonstration for how the survey questionnaire will be analysed and support identification of actional measures that the Travel Plan Coordinator will implement to meet 'travel plan targets', is required.

6. Parking and Cycling Storage.

- a. The layout of long-stay cycle storage does not provide acceptable aisle with for manoeuvring bicycles when the 'Sheffield' stands on both side of the aisle are occupied. Revised proposals are required.
- b. The plans illustrate existing car parking provision for 11 vehicles along the frontage of the building. The second plan illustrates the proposed parking layout for 11 vehicles including one 'Blue Badge' parking space. In both cases the parked vehicles encroach onto the adjacent carriageway and there is also no provision of footway for pedestrians. Revised layout is required that prioritises provision for pedestrians rather than for vehicles – (see NPPF 116). The application form indicated 14 existing and 13 proposed parking spaces – please correct as appropriate.
- c. Please consult Haringey Refuse Collection regarding adequacy of provision and layout of refuse storage provision.
- d. Details of supporting facilities for cyclists such as showers, lockers, changing room, should be provided.

7. Construction Management Plan: Submission of a construction logistic management plan for approval prior to start of works, is required and can be secured by condition.
8. Please summarise whether any off-site improvements are proposed to be funded and implemented - from the ATZ assessments.

The proposals are not supported for the transport reasons outlined above.

Regards,

Shreekant Patel.

Transport Planning Expert.

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