Planning Statement

Block H, Tottenham Commercial Park, Leeside Road, London, N17

November 2026

Turley

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01416

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1. Introduction

1.1 This Planning Statement (hereafter: "the Statement") has been prepared on behalf of Goodman Logistics Tottenham Unit Trust ("the Applicant"), in support of an application for full planning permission for the redevelopment of the site known as Block H, Tottenham Commercial Park, Leeside Road, London, N17 ("the site") to create a substation. The site falls within the jurisdiction of London Borough of Haringey ("LB Haringey"; "the Council"), who are the Local Planning Authority ("LPA").

1.2 The site comprises three connected commercial units in a terrace located on the south side of Leeside Road and accessed via an estate road which runs through Tottenham Commercial Park (formerly known as *Mowlem Trading Estate*). The wider site accommodates a mix of industrial, storage and distribution uses falling within Use Classes E(g)(iii), B2 and B8. The site is designated as Strategic Industrial Land ("SIL").

1.3 The proposal involves the demolition of the three connected existing Block H units, the principle of which has been approved via Prior Approval in November 2025 (LPA ref. **HGY/2025/3215**), and the construction of a new electrical substation, which will provide power to the wider Tottenham Commercial Park and beyond.

1.4 The description of development for this application is:

> *"Full planning application for the demolition of existing buildings and construction of a new substation."*

1.5 The proposed substation is required to provide additional electricity capacity to support the wider Tottenham Commercial Park and the future operation of other industrial land in north London.

1.6 This Statement sets out the justification for the proposed development and demonstrates why planning permission should be granted.

1.7 This application for full planning permission is supported by a suite of technical documents and drawings that are referred to throughout this statement. The full list of submission material is as follows:

- Cover Letter and Planning Statement, prepared by Turley;
- Community Infrastructure Levy Form, prepared by Turley;
- Application Fee - £34,099.00 (including £149.00 planning portal admin fee);
- Design and Access Statement, prepared by UMC Architects;
- Flood Risk Assessment, prepared by BWB;
- Sustainability Statement, prepared by CPWP;
- Pre-Demolition Audit, prepared by L.C.D. Consulting;

- Ecology Statement, prepared by FPCR;
- Fire Statement, prepared by Goodman;
- Noise Impact Assessment, prepared by Sharps Acoustics;
- Transport Statement, prepared by KMC Transport;
- Contamination Report, prepared by Applied Geology; and
- Accompanying Drawings, prepared by UMC Architects;
  - Site Location Plan;
  - Block Plan;
  - Demolition Plan;
  - Existing Elevations and Sections;
  - Proposed Site Plan;
  - Proposed Elevation and Sections;
  - Proposed Ground Floor Plan;
  - Proposed First Floor Plan; and
  - Proposed Roof Plan.
- Accompanying Drawings, prepared by Link Engineering;
  - Proposed Drainage Layout Plan;
  - Proposed Drainage Details Plan.

1.8 In accordance with *The Biodiversity Gain Requirements (Exemptions) Regulations 2024*, the proposed development/site boundary is considered exempt from biodiversity net gain as it does not impact more than 25 sqm of on-site habitat or 5 m of linear habitat. No surrounding landscaping or habitats are affected by the proposed development.

1.9 This Planning Statement is structured as follows:

- Chapter 1 – Introduction
- Chapter 2 – Site and Surrounding
- Chapter 3 – Planning Background
- Chapter 4 – Development Proposals
- Chapter 5 – Planning Policy Context

- Chapter 6 – Planning Assessment
- Chapter 7 – Conclusions

2. Site and Surrounding

2.1 The site is rectangular in shape and comprises three connected commercial units to the south of Leeside Road, located in the wider *Tottenham Commercial Park*. The site is accessed via an estate road which connects to Leeside Road and runs through Tottenham Commercial Park which is in the Applicant's ownership, as are wider employment sites in north London as further discussed below. **Figure 2.1** below shows an aerial photo of the approx. site boundary and the Applicant's surrounding land ownership.

2.2 The site is designated as SIL in the London Plan (2021)[1], the Council's adopted Local Plan Proposals Map (2017) and the Tottenham Area Action Plan (2017). The site is not allocated for a specific use or form of development in the Council's adopted Site Allocations DPD (2017).

2.3 The units on site benefit from a lawful use falling within use Classes E(g)(iii), B2 and B8, as per planning permission ref. HGY/2019/1283.

2.4 The site forms part of a wider established industrial estate and accommodates a range of employment-generating (predominantly industrial and storage & distribution) uses. The estate operates on a 24-hour basis. The character of the estate is predominantly functional and industrial, with contemporary buildings characterised by clean built forms, profiled metal cladding and a predominantly grey colour palette.

2.5 External areas are largely hard surfaced and comprise tarmac access roads, concrete service yards and areas used for vehicle parking and the storage of goods, with plot boundaries generally defined by palisade fencing.

2.6 The nearest existing residential properties are approximately 500m to the west of the site on Willoughby Lane, and new residential development is under construction at the Meridian Water regeneration area located to the north. Approximately 200m to the east are Wild Marsh West, the River Lea and Banbury Reservoir, which form part of the Lee Valley Ecological Corridor.

2.7 The site has good access to the Strategic Road Network, with connections to the A406 via the A1055. The site has a PTAL of 1b, on a scale of 0 to 6b, where 6b represents the highest level of accessibility.

2.8 The nearest railway station is Meridian Water Station on the Lea Valley Line, approximately 0.6km northwest of the site. The station is served by Greater Anglia services between Stratford and Hertford / Bishop's Stortford. Local bus services include Routes 192, which operates between Tottenham Hale and Enfield via Edmonton, and 341, which operates between Waterloo and Meridian Water via Harringay Green Lanes and Tottenham Hale. Route 192 also has a stop on Watermead Way immediately west of the site (Bus Stop NP), although this is only served in the Enfield-bound direction.

[1] Forming part of the cross-LPA-boundary Central Leaside Business Area SIL.

2.9 The site is neither statutorily or locally listed nor located within a Conservation Area. There are no designated heritage assets in the immediate surroundings of the site.

2.10 There are no Tree Preservation Orders ("TPOs") on or around the site. The site is previously developed land comprising industrial units and hard surfacing. There is no existing landscaping or biodiversity value within the application boundary.

2.11 The site is located within Flood Zone 2, which indicates a medium probability of flooding from rivers or the sea.

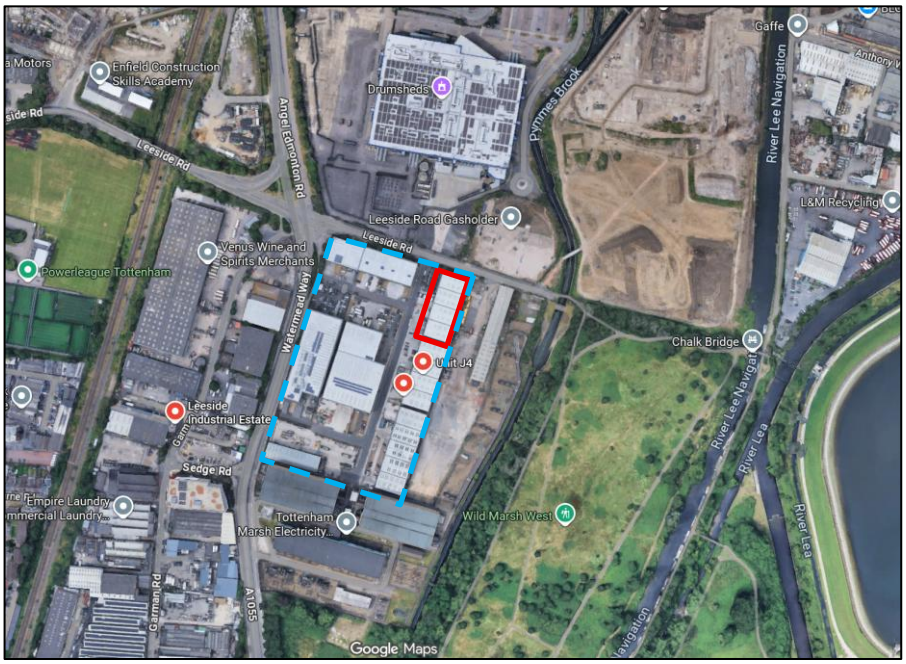

Figure 2.1 Aeriel photo with approximate application boundary outlined in red and land under the Applicant's control in blue (Source Google Maps)

3. Planning Background

3.1 A review of LB Haringey online planning records has been undertaken with the relevant planning history set out below. The selected planning history focuses on applications relating to change of use, substantial development and infrastructure on the site and surrounding Commercial Park. Minor applications, such as advertisement consent or condition discharges, have been omitted as they are not considered relevant to the current proposal.

Site Specific

- **HGY/2025/3215** | Demolition of all outlined existing buildings *(Application for prior approval: Demolition) (Prior Approval Granted, 20/11/2025).*
- **HGY/2020/2660** | Non-material amendment to HGY/2018/0400 involving changes to signage, lighting, building numerals and fenestration (Approved, 29/10/2020).
- **HGY/2020/2337** | Erection of internal security fencing to Units D3-D6, and Units in Blocks H, J and K, with new bollards and Green Palisade Fence fronting Leeside Road *(Approved, 27/10/2020).*
- **HGY/2019/1283** | Continued use of existing industrial and warehouse units (Blocks H1-4, J1-4 and K1-5) for use classes falling within B1c, B2 and/or B8 *(Approved, 07/06/2019).*
- **HGY/2018/3566** | Non-material amendment to HGY/2018/0400 involving changes to fenestration (Blocks H, J and K) (Approved 07/12/2018).

Wider Tottenham Commercial Park

- **HGY/2018/0400** | Refurbishment of Units 12-22 involving installation of steel cladding to all elevations, creation of new parapet frame, and replacement doors and windows *(Approved, 02/05/2018)*
- **HGY/2016/3489** |Redevelopment in the form of new industrial / warehousing units (Use Class B1(c), B2 and B8) together with relocated electricity substation *(Approved, 17/03/2017).*
- **HGY/2016/2176** | Erection of Single Storey Entrance Lobby, reconfiguration of existing vehicle parking areas to increase number of existing car parking bays, alterations to existing building facades to provide new Entrance lobby, vehicle access door, additional window, extension / alterations to mezzanine level and the provision of wash bay within curtilage of site in association with the existing class B2 use of the building as a vehicle Service and MOT centre (Class B2) (Unit C) *(Approved, 14/10/2016).*
- **HGY/2016/0790** | Installation of new electricity sub-station and associated fencing *(Approved, 10/05/2016).*

- **HGY/2015/1321** | Development of small-scale standby electricity generation plant in an existing portal framed building *(Approved, 18/12/2015).*

- **HGY/2014/2638** | Change of use from B1 (light industrial) to B3 (power station) use class to develop a standby electricity generation plant *(Approved, 19/11/2014).*

- **HGY/2013/1792** | The demolition of Unit 11 and construction of new builders' merchants (Class B8), and industrial and warehousing (former Use Class B1(c) (i.e. current Class E(g)(iii)), Class B2 and Class B8) units *(Approved, 13/12/2013).*

3.2 The planning history demonstrates that the site and wider Tottenham Commercial Park benefits from an established industrial and employment use. Of particular relevance to the current proposal are the previous approvals for electricity infrastructure, including the installation of a new substation under application ref. HGY/2016/0790 and the provision of a relocated substation as part of the redevelopment approved under ref. HGY/2016/3489.

3.3 These planning applications demonstrate that electricity infrastructure is a well-established and accepted component of the wider estate's use, lending support to the principle of the proposed redevelopment for a new strategic substation facility which supports the continued operation and future needs of the employment-generating uses in this location and beyond.

3.4 Similarly, and as noted above, **the principle of the demolition of the existing units within the site was deemed acceptable by the Council** and **benefits from prior approval granted in November 2025 under ref. HGY/2025/3215**.

Other relevant schemes in the surrounding area

3.5 The wider estate and land beyond is undergoing substantial change, in terms of redevelopment (involving changes to build form/height/context) and the mix of surrounding uses. Notably, areas north of the site are subject to the phased residential-led mixed use Meridian Water regeneration scheme. Meridian Water Phase 1 is located northwest of the site on land west of Angel Edmonton Road and north of Leeside Road. Outline permission for the phase was granted by LB Enfield under ref. 16/01197/RE3 on 10 July 2017, and an associated Reserved Matters application (approved 24 May 2021, ref. 20/03821/RM) provided details for sub-phase 1a, comprising, *inter alia*, 300 residential units across buildings of 3-12 storeys.

3.6 Phase 1b was subject to a fresh full application under ref. 21/04742/FUL, approved on 24 August 2023. The full planning application received approval of increased numbers of residential units than those permitted under the original outline permission for Phase 1 as a whole. Cumulatively, the Reserved Matters application for Phase 1a and the full application for Phase 1b are expected to provide 977 residential units along with a mix of non-residential uses.

3.7 Phase 2 of the Meridian Water regeneration scheme relates to land adjacent to the east of Pymmes Brook. The Phase 2 outline application was approved under ref. 19/02718/RE3 on 31 March 2022 for up to 2,300 residential units, up to 18,000sqm of

purpose-built student accommodation (PBSA) or purpose-built shared living (PBSL), as well as a range of other non-residential uses. An associated Reserved Matters application for sub-phase 2a was approved under ref. 22/02098/RM on 2 November 2022, relating just to a former gasholder site adjacent to the north of the site. This the only Reserved Matters submitted pursuant to the Meridian Water Phase 2 Outline Planning permission, to date. The indicative timescale for the completion of the whole of Phase 2 is 2031.

3.8 Drumsheds (former Ikea site) currently benefits from a temporary permission (ref. 23/02199/FUL, approved 14 March 2024) for sui generis multi-purpose use as a cultural, creative and entertainment space. From a review of the decision notice, this temporary permission expires on 16 August 2026, at which point the site's lawful use will revert to the former Class E retail use. The temporary permission was subsequently varied to extend the period of use until 20 December 2026 under application ref. 25/03859/VAR, which was approved on 2 July 2026. A further Section 73 application (ref. 26/03163/VAR) was validated on 24 July 2026 and is currently undergoing the determination process, seeking to extend the temporary use until January 2027.

3.9 Overall, the planning history and emerging development proposals within the surrounding area demonstrate that the site sits within a rapidly evolving part of north London, characterised by significant regeneration to the north alongside the retention and redevelopment of strategic employment and infrastructure uses. While large-scale mixed-use redevelopment is principally focused within the Meridian Water Opportunity Area, more localised and piecemeal redevelopment continues to occur within the established industrial areas surrounding the site. This context indicates an area of transition, where substantial new investment and infrastructure upgrades are anticipated, and provides important background to the consideration of the proposed development.

4. Development Proposal

4.1 This Planning Statement should be read in conjunction with the proposed drawings and the Design and Access Statement ("DAS") accompanying this submission which provides further detail on the proposals.

4.2 Planning permission is sought for the following development:

> "*Full planning application for the demolition of existing buildings and construction of a new substation*."

4.3 The proposal comprises the demolition of three-connected existing units, specifically, Units H1, H2 and H3, and the construction of a new enclosed electrical substation. The substation would provide additional electricity capacity to support the wider Tottenham Commercial Park and the Applicant's other industrial land holdings in north London, including Martinbridge Industrial Estate in LB Enfield and Staples Corner Business Park in the LB Brent. It is further necessary to support the continued operation and future growth of the industrial estates and their existing and future occupiers.

4.4 The proposed substation will connect to the existing National Grid Tottenham Marsh 275kV substation infrastructure through two independent high voltage connections. Electricity is proposed to be transformed from 275kV to 132kV through two power transformers and distributed through a 132kV Gas Insulated Switchgear ("GIS") system. The voltage would be further reduced to 20kV for businesses and the substation also provides capacity for future outgoing connections.

4.5 The GIS equipment would be contained within enclosed metal compartments, reducing the overall footprint of the substation. The proposed building would be arranged over two storeys, accommodating the principal electrical infrastructure together with control, telecommunications, battery and ancillary operational facilities. The proposed floorspace is summarised in the following table:

Table 4.1: Proposed floorspace (GIA)

	Gross Internal Area (GIA) (sqm)	Gross External Area (GEA) (sqm)
Ground Floor	3,366	3,478
First Floor	734	751
Total	**4,100**	**4,229**

4.6 The proposed substation building has a footprint of 71m x 47m, with a ridge height of 15.2m and eaves heights of 12.4m. The size and massing of the building are driven by the technical and operational requirements of the electrical infrastructure it is designed to accommodate, including the required clear internal heights for transformers, switchgear and associated equipment.

4.7 The substation will be fully enclosed and adopt a contemporary industrial design that reflects its operational function and the established character of Tottenham Commercial Park. The building is proposed to be finished in a palette of grey metal cladding and roofing materials, incorporating a combination of horizontal and vertical cladding elements to provide visual articulation across the elevations. The enclosure will screen the electrical equipment, create a cohesive built form and assist in integrating the development within the surrounding industrial townscape.

4.8 The development has been designed to retain the existing landscaped boundary treatments, particularly along the Leeside Road frontage, outside the application boundary. The retained landscaping would continue to soften views of the site and contribute to local townscape character.

4.9 The use of a muted grey cladding palette, together with the retention of existing landscaping and boundary vegetation, would assist in reducing the visual prominence of the building when viewed from surrounding public vantage points.

4.10 Access to the substation will remain as existing and be provided from the existing private estate road, which is accessed from Leeside Road. The site will be unmanned and operated via remote monitoring, with no dedicated staff parking proposed. As set out in the submitted Transport Statement, visits to the site will be infrequent and limited to activities such as monthly meter readings, annual equipment inspections and occasional maintenance works. Where maintenance or servicing visits are required, vehicles will utilise the existing communal estate car park located to the south-west of the site, approximately 85m from the site, and will park there only on a temporary basis whilst works are undertaken. No changes to the existing access arrangements are proposed and the development will not generate regular staff or customer trips.



Figure 4.1 Proposed Site Plan

5. Planning Policy Context

5.1 Section 38(6) of *The Planning and Compulsory Purchase Act (2004)* states that any determination under the Planning Acts should be made in accordance with the development plan, unless material considerations indicate otherwise. Consideration of compliance with the Development Plan is required for all applications, and it is the responsibility of the decision maker as to how much weight is applied, or to any other material considerations.

Development Plan

5.2 The current adopted Development Plan for LB Haringey comprises of the following planning policy documents:

- The London Plan (2021);
- Haringey Strategic Policies DPD (2013, with alterations 2017);
- Haringey Development Management DPD (2017);
- Haringey Site Allocations DPD (2017);
- Tottenham Area Action Plan (2017); and
- Haringey Local Plan Policies Map.

Other Material Considerations

National Planning Policy Framework (2026)

5.3 The National Planning Policy Framework sets out the government's policies for plan making and for making decisions on development proposals in England. It is a material consideration of critical importance in both contexts. This version replaces the previous National Planning Policy Framework published in December 2024. Supporting the NPPF is the online National Planning Practice Guidance ('PPG' or 'NPPG') (2024), and the National Design Guide (2019).

Supplementary Planning Guidance (SPGs) and Documents (SPDs)

- LB Haringey Sustainable Design and Construction SPD (March 2013).

Emerging London Plan

5.4 The GLA is currently preparing for the publication of a new London Plan. In May 2025, the Mayor of London launched consultation on the Towards a New London Plan document, setting out the key considerations and issues that will shape the next iteration of the capital's strategic planning framework.

5.5 Following this, the draft London Plan was published on 16 July 2026 and has been subject to a public consultation, with examination anticipated in 2027, and adoption in early 2028.

5.6 The Draft London Plan does not yet form part of the statutory development plan. However, it is a material consideration in the determination of planning applications. The weight given to its policies should reflect the stage of preparation, any unresolved objections and their consistency with the NPPF, and is considered to be very minimal at this stage.

Emerging Local Plan

5.7 The Council is preparing a new Local Plan to guide development in the borough to 2041. The Council is currently reviewing and analysing comments received during the consultation held between 10 October and 19 December 2025, ahead of preparing a Proposed Submission Local Plan (Regulation 19), which is expected to be published for consultation in the second half of 2026.

5.8 The Regulation 19 Local Plan has not yet been published and therefore the emerging policies can only be given limited weight at this stage.

Planning Policies

5.9 The most relevant policies applicable to the Proposed Development are listed below:

The London Plan (2021);

- Policy D3 – Optimising Site Capacity Through the Design-Led Approach
- Policy D4 – Delivering Good Design
- Policy E4 – Land for Industry, Logistics and Services to Support London's Economic Function
- Policy E5 – Strategic Industrial Locations
- Policy E7 – Industrial Intensification, Co-location and Substitution
- Policy SI1 – Improving Air Quality
- Policy SI2 – Minimising Greenhouse Gas Emissions
- Policy SI3 – Energy Infrastructure
- Policy SI12 – Flood Risk Management
- Policy SI13 – Sustainable Drainage
- Policy T4 – Assessing and Mitigating Transport Impacts

Haringey Development Management DPD (2017)

- Policy SP4 – Working Towards a Low Carbon Haringey
- Policy SP8 – Employment
- Policy SP11 – Design
- Policy SP14 – Water Management and Flooding
- Policy DM1 – Delivering High Quality Design
- Policy DM21 – Sustainable Design and Construction
- Policy DM22 – Decentralised Energy
- Policy DM23 – Environmental Protection
- Policy DM24 – Management of Flood Risk and Surface Water Runoff
- Policy DM37 – Maximising the Use of Employment Land and Floorspace
- Policy NT2 – Strategic Industrial Land in North East Tottenham

Planning designations

5.10 A review of LB Haringey Policy Map (2017) and the London Plan (2021) shows that the site is subject to the following designations:

- Strategic Industrial Location ("SIL");
- Archaeological Priority Area; and
- Flood Zone 2.

6. Planning Assessment

6.1 This section of the Planning Statement provides an assessment of the relevant planning considerations against the adopted Development Plan and relevant material considerations, and the site's applicable planning designations.

6.2 This section will address the following key planning matters related to the Proposed Development:

- Principle of development;
- Design;
- Impact on neighbour amenity;
- Air quality;
- Transport;
- Energy and sustainability;
- Flood Risk and Drainage;
- Fire;
- Contamination;
- Ecology; and
- Biodiversity.

Principle of Development

6.3 **London Plan Policy E4 (Land for industry, logistics and services to support London's economic function)** seeks to ensure the retention, enhancement and provision of industrial capacity across London. **Part A** recognises that SIL should make provision for the varied operational requirements of a wide range of land uses including light/general industry, storage and distribution, but also *"utilities infrastructure (such as energy and water)"*[2].

6.4 **Policy E5 (Strategic Industrial Locations)** seeks to protect the function of Strategic Industrial Locations and their capacity for industrial and related uses including those set out in Policy E4(A), whilst **Policy E7 (Industrial intensification, co-location and substitution)** promotes the efficient use of industrial land and seeks to ensure that industrial activities and their continued operation are not compromised.

6.5 **Haringey Strategic Policy SP8 (Employment)** seeks to protect the Borough's employment land hierarchy, including Strategic Industrial Locations. The supporting text

[2] Note: Utility infrastructure is also supported in-principle in SIL under **Draft Policy GLE2(F)(3)** of the Draft London Plan 2026.

goes on to note that change of use outside the traditional B Use Class that are not consistent with or complimentary to traditional B Use Classes will not allowed, therefore, indicating that uses complimentary to employment-generating uses, such as new utilities infrastructure, will be supported where they support the function of the traditional B Use Classes. **Policy DM37 (Maximising the use of employment land and floorspace)** supports the intensification, renewal and modernisation of employment land within SILs.

6.6 **Tottenham AAP Policy NT2 (Strategic Industrial Land in North East Tottenham)** similarly seeks to safeguard the strategic industrial function of North East Tottenham and ensure that these areas can adapt to changing economic needs whilst maintaining their overall function.

6.7 In **Policy E2(1)**, the **new NPPF** further sets out that to *"support business growth, substantial weight should be given to:*

a. The economic benefits of proposals for commercial development which allow businesses to invest, expand and/or adapt; especially where this would support the economic vision and strategy for the area".

6.8 The proposal would result in the demolition of the existing units within Block H. The demolition already benefits from Prior Approval granted by the LPA in November 2025, which established the principle of demolition[3]. Furthermore, the proposed development of energy infrastructure is supported as an acceptable land use within SIL, as set out in **Policy E4(A)** of the London Plan. The principle of redeveloping the site to provide an electricity substation is therefore in accordance with the Development Plan.

6.9 The proposed use constitutes strategic utility infrastructure that directly supports the continued operation, growth and resilience of the wider Tottenham Commercial Park, surrounding SIL and wider sites within the Applicant's ownership subject to strategic employment and economic growth[4]. In particular, the development would provide additional electricity capacity necessary to accommodate existing occupiers and facilitate future industrial and economic growth across north London and **Lea Valley (and Park Royal / A40 / Heathrow) Industrial Property Market Area(s)[5]**. The increasing energy demands of modern industrial; logistics and technology-based occupiers mean that additional electricity infrastructure is required to ensure Strategic Industrial Locations remain capable of accommodating future business growth and investment.

6.10 This is an important consideration in the application of relevant Development Plan policies (i.e. London Plan Policies E4, E5 and E7) which recognise the need to ensure that SILs continue to perform their economic function and are supported by the infrastructure necessary to enable their operation. Indeed, Policy E4[6] identifies utilities

[3] This constitutes the Fall-Back Position.

[4] For instance, in August 2026, the Applicant obtained Outline Planning Permission for the redevelopment of its site at Martinbridge Industrial Estate in LB Enfield to provide up to 68,000 sqm of new employment-generating floorspace in the Great Cambridge Road and Martinbridge SIL (see LB Enfield ref. 25/02093/OUT). Similarly, Staples Corner Business Park is allocated in the LB Brent Local Plan (February 2022) and Staples Corner Growth Area Masterplan and Design Code SPD (November 2024) for significant employment-led regeneration and redevelopment.

[5] As set out in Fig. 4.1 of the Draft London Plan (2026).

[6] Also see Paragraph 6.4.1 of the London Plan (2021).

and infrastructure as appropriate uses within SILs, recognising their role in supporting London's industrial economy, whilst Policy E5(C) specifically supports industrial-type activities within SIL. In this regard, the proposed development is not merely compatible with the continued operation of the SIL; it is infrastructure that underpins its long-term function, resilience and growth.

6.11 For the avoidance of doubt, the proposal does not result in the release of industrial land for residential, retail, leisure or other non-industrial purposes. Instead, the site would remain in a *sui generis* use that directly supports industrial activity and employment across the wider SIL. Whilst the existing units make a modest contribution to industrial floorspace provision, the replacement infrastructure will result in additional floorspace and also support the potential for future intensification both within Tottenham Commercial Park and across the wider electricity network served by the facility.

6.12 Furthermore, the proposed development aligns with the objectives of **Policy DM37**, which seeks to maximise the effectiveness and productivity of employment land within SIL. In this case, the proposal will deliver essential infrastructure required to support the continued occupation, intensification and modernisation of industrial premises across the wider area. The strategic benefits arising from the enhanced electricity capacity that would be provided will support both existing occupiers and future investment within Tottenham Commercial Park and other industrial areas served by the network and are therefore a key material consideration.

6.13 The proposed substation therefore performs an enabling function that supports the delivery of the wider objectives of London Plan Policies E4, E5 and E7, Strategic Policy SP8 and Policy NT2.

6.14 Overall, it is considered that the principle of development is acceptable as:

- The demolition of the existing buildings on site benefits from Prior Approval which established the acceptability of these works and remains implementable;
- The provision of energy-related utility infrastructure within SIL is in accordance with Policies E4 and E5 of the London Plan; and
- The development of a new substation and electricity infrastructure in this location is necessary to support the continued operation, resilience and future economic growth and investment in Tottenham Commercial Park, the wider SIL and the Applicant's wider existing landholdings in north London which benefit from outline planning permission (Martinbridge Industrial Estate) and/or site allocations (Staples Corner Business Park) for redevelopment and intensification.

Design

6.15 **London Plan Policy D3 (Optimising site capacity through the design-led approach)** sets out the requirement to ensure that development is of the most appropriate form for the site. The policy additionally requires proposals to positively respond to local

distinctiveness through their layout, orientation, scale, appearance and shape, as well as the existing and emerging street hierarchy, building types, forms and proportions.

6.16 **Policy DM1 (Delivering high-quality design)** of the Local Plan requires proposals to relate positively and have regard to their locality, including, inter alia, in terms of building heights; the prevailing surrounding form, scale and massing; urban grain; and surrounding plot and building widths. It also requires development proposals to have regard to the prevailing form, scale and massing around the site in order to relate positively to the locality. However, it is noted that **Paragraph 2.7** of the **Development Management DPD** states that it is recognised that design includes both aesthetics and functionality, which is relevant for a SIL designated site where its intended purpose is predominantly functional.

6.17 The proposed substation has been designed to respond to its industrial context and the functional requirements of the proposed energy infrastructure, as set out in the accompanying Design and Access Statement. The development comprises a single enclosed substation building with associated electrical equipment, access and maintenance infrastructure. The scale and form of the building are appropriate to the established industrial character of Tottenham Commercial Park and would not appear inappropriate within the wider SIL. The proposed height has been driven by the operational requirements of the substation equipment it is designed to accommodate. Notwithstanding this functional requirement, the building's height is consistent with the established industrial townscape of Tottenham Commercial Park, where large-format buildings, plant and infrastructure are characteristic features, ensuring that it sits comfortably within the wider SIL context.

6.18 The proposed building adopts a contemporary industrial form and a restrained material palette, with grey cladding reflecting the functional appearance of the surrounding estate. The substation and associated equipment will be enclosed to provide an appropriate visual treatment whilst screening the operational parts of the infrastructure, including from views from Meridian Water.

6.19 The proposal retains the existing access arrangement from the private estate road and the existing soft landscaping and boundary treatment along Leeside Road (which sits outside the application boundary), limiting changes to the relationship between the site and the surrounding industrial estate. The proposed development will therefore integrate with the existing site layout and urban grain.

6.20 Given the site's location within a SIL and the functional nature of the proposed infrastructure, the design appropriately prioritises functionality whilst responding positively to the surrounding context. The proposal is therefore considered to accord with London Plan Policy D3 and Haringey Policy DM1 and would provide a suitably designed addition to the established industrial environment.

Impact on neighbour amenity

6.21 **London Plan Policy D3 (Optimising site capacity through the design-led approach)** requires development proposals to consider their environmental impacts and ensure that development does not adversely affect the comfort and enjoyment of surrounding areas.

6.22 **London Plan Policy D13 (Agent of Change)** requires new noise-generating development to identify and mitigate potential noise and other nuisance impacts on neighbouring residents and businesses. It also seeks to ensure that established noise-generating uses are able to continue operating without unreasonable restrictions.

6.23 **London Plan Policy D14 (Noise)** seeks to avoid significant adverse noise impacts and requires the potential adverse effects of noise from new development to be mitigated and minimised. The policy also requires regard to be given to existing noise-generating uses and their potential for continued operation and intensification

6.24 **Policy DM23 (Environmental Protection)** of the Local Plan requires potentially noisy development to demonstrate that appropriate measures will be implemented to mitigate its impact. The policy also requires consideration of air quality and, where relevant, external lighting.

6.25 The nearest existing residential properties are approximately 500m west of the application site on Willoughby Lane. The site is otherwise located within an established industrial area, with the surrounding land predominantly comprising industrial and commercial uses. The proposal would therefore be situated within an environment where industrial activity is already established.

6.26 Notwithstanding the above, it is important to consider future developments of the surrounding area, particularly the wider Meridian Water regeneration area to the north includes existing and consented residential development. The planning applications (notably ref. 21/04742/FUL and 22/02098/RM) for these schemes have considered the established industrial context of the SIL area and incorporated mitigation measures where required, including enhanced glazing, mechanical ventilation and associated building design measures to achieve acceptable internal noise levels. The relevant assessments concluded that acceptable residential amenity could be achieved notwithstanding the presence of existing industrial premises, plant and HGV movements in the surrounding area. Consistent with the *Agent of Change* principle, it is the responsibility of new sensitive receptors to incorporate appropriate mitigation measures in response to the established industrial environment, rather than employment-generating developments coming forward within SIL areas.

6.27 The proposed substation would be unmanned and remotely monitored, with no dedicated staff accommodation or associated regular customer activity. Routine maintenance would be limited to periodic inspections and meter readings, and the development would not increase vehicle movements or general activity at the site.

6.28 The principal potential impact on neighbouring amenity is therefore associated with noise generated by the operation of the electrical equipment, including the transformers. The substation would be enclosed, which would contain operational noise. In addition, the substantial separation between the site and the nearest residential properties, together with the existing industrial context, would further limit the potential for noise impacts on residential amenity.

6.29 The proposal would also support the continued operation of the wider industrial estate and would not introduce a noise-sensitive use which could constrain existing or future industrial activities within the SIL. The proposal is therefore consistent with the Agent of

Change principle and would not be expected to result in unacceptable impacts on surrounding occupiers.

6.30 The submitted Noise Impact Assessment demonstrates that the operation of the proposed substation will not result in unacceptable noise effects on surrounding receptors. The assessment establishes that, with appropriate plant specification and noise control measures secured through conditions, operational noise can be controlled to levels that accord with BS4142 guidance and avoid significant adverse effects on amenity. Having regard to the enclosed nature of the development, the substantial distance to the nearest residential properties and the prevailing industrial noise environment, the proposal is not expected to result in any material noise impacts. The development is therefore considered acceptable from a noise and amenity perspective and compliant with London Plan Policies D3, D13 and D14 and Haringey Policy DM23.

Air quality

6.31 **London Plan Policy SI 1 (Improving Air Quality)** seeks to ensure development does not worsen existing air quality or create unacceptable exposure to air pollution. Development should be at least Air Quality Neutral and incorporate measures to minimise emissions and exposure to pollution. The policy also requires appropriate measures to minimise dust and emissions during demolition and construction.

6.32 Haringey Development Management **Policy DM23 (Environmental Protection)** requires development proposals to consider air quality and be designed to improve or mitigate impacts on air quality within the Borough and for occupiers or users of the development. Where appropriate, air quality assessments and mitigation measures should be provided.

6.33 The proposal does not include energy generation and therefore the installation will not generate emissions during its operation. Moreover, vehicle movements are limited to occasional maintenance and inspection visits. Therefore, no significant air quality effects are forecast.

6.34 The demolition and construction phases would be temporary, and appropriate mitigation measures will be implemented to minimise dust and emissions during the works, i.e. in the form of a Demolition & Construction Management Plan.

6.35 Given the nature of the proposed development, it is not anticipated that the proposal will result in a significant impact on local air quality. The development is therefore considered to accord with London Plan Policy SI 1 and Haringey Policy DM23.

Transport

6.36 **London Plan Policy T6.2 (Office Parking)** seeks to encourage car-free development in locations that are well connected by public transport and car-lite development elsewhere. The supporting text recognises that the parking requirements associated with industrial uses vary considerably depending on the location, nature of the development and operational requirements. Parking provision for industrial development is therefore expected to be considered on a case-by-case basis.

6.37 The starting point is a max. of 1 space per 100 sqm of floorspace (GIA) in outer London settings and 1 space per 600 sqm of floorspace (GIA) in opportunity areas (in line with the office parking standards set out in the London Plan Table 10.4).

6.38 **London Plan Policy T5 (Cycling)** seeks to remove barriers to cycling and requires development proposals to provide appropriate, secure and fit-for-purpose cycle parking in accordance with the standards set out in the London Plan.

6.39 **Haringey Development Management Policy DM32 (Parking)** requires development proposals to be assessed against the relevant parking standards set out in the London Plan. The policy seeks to ensure that parking provision is appropriate to the needs of the development and does not result in unacceptable impacts on the surrounding area.

6.40 The proposed development will utilise the existing access from the private estate road and does not require any changes to the existing access onto Leeside Road.

6.41 As abovementioned, the proposed substation will be unmanned and remotely monitored, with no permanent staff or customer activity. Operational trips will therefore be limited to occasional maintenance and inspection visits including monthly meter readings and annual equipment checks. No dedicated parking provision is required. Maintenance and servicing vehicles will make use of the existing communal estate car park located approximately 85m to the south-west of the site, where vehicles can park temporarily whilst inspection, meter reading or maintenance activities are undertaken. As such, the development will not require on-site staff or customer car parking.

6.42 No dedicated car parking is therefore proposed as part of the development. This is considered appropriate given the operational characteristics of the proposed substation and is consistent with the approach in London Plan Policy T6.2, which recognises that parking requirements for industrial-related development should reflect the specific operational requirements of the use.

6.43 The nature of the proposed use also means that there will be no regular staff or visitor requirement for cycle parking. Dedicated cycle parking is therefore not proposed, but any engineer arriving on site by bicycle could leave it securely within the building for the duration of their visit.

6.44 Overall, the proposal will make use of the existing access arrangements, generate very limited vehicle movements and not give rise to a requirement for dedicated car or cycle parking. The proposal is therefore considered to accord with London Plan Policies T5 and T6.2 and Haringey Policy DM32.

Energy and sustainability

6.45 **London Plan Policy SI2 (Minimising Greenhouse Gas Emissions)** requires major development proposals to contribute towards achieving net zero-carbon development through the energy hierarchy of being lean, clean, green and seen. Proposals should be supported by an energy strategy demonstrating how carbon emissions will be minimised through energy efficiency and low- and zero-carbon measures.

6.46 **London Plan Policy SI4 (Managing Heat Risk)** requires development proposals to minimise overheating and reduce the impact of the urban heat island effect through appropriate design measures.

6.47 **Haringey Strategic Policy SP4 (Working towards a Low Carbon Haringey)** promotes energy efficiency and low- and zero-carbon energy generation. The policy requires non-residential development to achieve high standards of sustainable design and encourages the incorporation of decentralised and renewable energy technologies where feasible.

6.48 This application is accompanied by a Sustainability Statement prepared by CPWP. It confirms that the building is inherently low energy as it does not require fixed heating, cooling, ventilation or domestic hot water systems and, as such, operational energy demand is limited principally to internal and external lighting. Energy efficient LED lighting with a minimum efficacy of 120 lumens per circuit watt is proposed throughout the development, supplemented by zoning, switching controls and absence detection to minimise unnecessary energy consumption. External lighting would also be controlled through photocells and time clocks to ensure operation only when required.

6.49 The Sustainability Statement confirms that the feasibility of low and zero-carbon technologies has been assessed in accordance with relevant planning policy requirements. Solar photovoltaic panels and stand-alone wind generation were considered; however, neither technology was found to be viable given the exceptionally low operational energy demand of the building, the absence of a meaningful base electrical load, and site-specific operational constraints. The proposal therefore adopts a fabric-first and energy-efficiency-led approach that is proportionate to the nature and operational characteristics of the development.

6.50 A pre-demolition audit has been undertaken to maximise opportunities for the retention, reuse and recycling of materials arising from the demolition of the existing buildings. As set out in the pre-demolition audit, a retrofit of the existing building is not feasible due to spatial requirements of the proposed substation equipment. With regards to existing materials, concrete (the most predominant material on site by weight) would be crushed and reused, whilst steel and other recyclable materials would be recovered and diverted from landfill. The Sustainability Statement anticipates that at least 95% of non-hazardous construction waste could be reused or recycled, with all timber sourced from certified sustainable forestry sources.

6.51 The building has also been designed in accordance with circular economy principles. Durable, low-maintenance materials, including robust grey cladding, would provide resilience to future climate conditions and reduce long-term maintenance requirements. The enclosure would incorporate removable elevation panels to facilitate the replacement or upgrading of transformer equipment as operational requirements evolve, thereby extending the useful life of the development and supporting future adaptability. Furthermore, the development would have no operational water demand, as the building does not require plumbing, water supply infrastructure or sanitary facilities.

6.52 In addition, the Sustainability Statement confirms that alternative synthetic gas mixtures with a lower global warming potential will be pursued in place of traditional SF_6-based

equipment, thereby reducing the environmental impacts associated with electrical infrastructure.

6.53 Taken together, these above measures demonstrate that the proposal has been designed to minimise operational energy demand, reduce embodied carbon, promote resource efficiency and support long-term climate resilience. The proposal therefore accords with the objectives of London Plan Policies SI2 and SI4, Haringey Strategic Policy SP4 and has had regard to the requirements of Policy DM22.

Flood Risk and Drainage

6.54 **London Plan Policy SI12 (Flood Risk Management)** requires development proposals to manage flood risk from all sources in a sustainable and effective manner. Development should minimise and mitigate flood risk, address residual risks, and where appropriate incorporate measures that make space for water and improve flood resilience.

6.55 **London Plan Policy SI13 (Sustainable Drainage)** promotes the drainage hierarchy, encouraging surface water to be managed as close to its source as possible and prioritising green infrastructure measures that deliver wider environmental and amenity benefits.

6.56 **Haringey Strategic Policy SP5 (Water Management and Flooding)** seeks to reduce flood risk within the borough and requires development to manage surface water effectively, incorporate sustainable drainage measures, and avoid increasing flood risk on-site or elsewhere. The policy also promotes efficient water management and resilience to the impacts of climate change.

6.57 **Haringey Policy DM24 (Flood Risk and Protection)** requires development proposals to demonstrate that they appropriately assess and manage flood risk, taking account of all sources of flooding. Development must be safe for its lifetime, avoid increasing flood risk elsewhere, and where necessary incorporate mitigation and resilience measures.

6.58 **Haringey Policy DM25 (Sustainable Drainage Systems)** requires development proposals to incorporate SuDS in accordance with the drainage hierarchy and demonstrate that surface water run-off will be managed appropriately. The policy promotes measures that reduce run-off rates and volumes whilst delivering wider environmental and biodiversity benefits where practicable.

6.59 The Flood Risk and Drainage Strategy concludes that the proposed development is at a low risk of flooding from all sources and can be delivered safely for its lifetime. Whilst the site is identified within Flood Zone 2, updated Environment Agency hydraulic modelling demonstrates that it lies outside the defended 1 in 1,000-year flood extent, including an allowance for climate change. The majority of the site is also outside areas at risk of surface water flooding, with any localised risk confined to the site boundary and surrounding highway areas. The proposal will utilise the existing positively drained site and a new drainage system designed to modern standards, with no increase in impermeable area or runoff rates. The drainage strategy demonstrates that surface water can be managed effectively, with capacity provided for up to and including the 1 in 100-year rainfall event with an allowance for climate change, whilst ensuring that flood risk is not increased elsewhere

6.60 The proposed flood risk mitigation and drainage measures demonstrate that the development will be safe for its lifetime, will not increase flood risk elsewhere, and will manage surface water runoff in a sustainable manner through the incorporation of sustainable drainage principles. The proposal therefore accords with the objectives of London Plan Policies SI12 and SI13 and Haringey Strategic Policy SP5, and has had regard to the requirements of Policies DM24 and DM25.

Fire

6.61 **London Plan Policy D12 (Fire Safety)** requires all development proposals to achieve the highest standards of fire safety and to ensure the safety of all building users. The policy requires development to incorporate appropriate fire safety measures, minimise the risk of fire spread, provide suitable means of escape and evacuation, and ensure adequate access and facilities for firefighting. Major development proposals should be accompanied by a Fire Statement demonstrating how the proposal satisfies the requirements of the policy.

6.62 **Haringey Strategic Policy SP11 (Design)** and the Council's wider design policies seek to ensure that development delivers safe, accessible and inclusive environments. In this regard, development proposals should be designed to safeguard the amenity and wellbeing of future occupiers and visitors, including through the provision of safe access, circulation and building design.

6.63 The Fire Statement submitted in support of this application sets out principal fire-safety considerations and confirms that the proposal includes appropriate fire prevention, containment, emergency access and operational measures.

6.64 The fire safety measures incorporated within the development demonstrate that the proposal has been designed to achieve a high standard of fire safety, provide appropriate means of escape, and ensure suitable access for firefighting and emergency response. The proposal therefore accords with the objectives of London Plan Policy D12 and the wider design and safety objectives of Haringey Strategic Policy SP11. If required, a Final Fire Safety Statement can be requested under a suitably worded planning condition.

Contamination

6.65 **Haringey Policy DM23 (Environmental Protection)** requires development to appropriately assess and mitigate land contamination and pollution risks, ensuring sites are suitable for their proposed use and do not result in unacceptable impacts on human health, controlled waters or the wider environment.

6.66 This application is accompanied by a Site Preparation Report prepared by Applied Geology Ltd. The report reviews the site's historical development, surrounding land uses and available geo-environmental information and provides an assessment of potential contamination risks associated with the proposed development.

6.67 The report highlights that the site forms has a long history of industrial activity. Historical uses within and surrounding the estate have included civil engineering works, concrete production, fuel storage, warehousing, gasworks, gasholders, chemical works and

electricity infrastructure. As a consequence, there is the potential for contamination to be present within areas of underlying Made Ground.

6.68 Previous geo-environmental investigations undertaken across the wider Commercial Park identified localised contamination associated with historical industrial activities, including elevated concentrations of hydrocarbons, polycyclic aromatic hydrocarbons (PAHs), metals and isolated occurrences of asbestos within Made Ground. Elevated concentrations of certain contaminants were also identified within groundwater. However, previous assessments concluded that contamination levels were generally compatible with commercial and industrial land uses and no elevated ground gas concentrations were recorded.

6.69 The report notes that contamination planning conditions relating to surrounding developments within Tottenham Commercial Park have been discharged by the LPA. Furthermore, a Detailed Quantitative Risk Assessment undertaken in relation to controlled waters concluded that additional remediation measures to protect groundwater receptors were not required.

6.70 Whilst investigations have been undertaken across the wider estate, no intrusive geo-environmental investigation has previously been carried out within the footprint of the application site itself. The report therefore recommends that a targeted intrusive investigation is undertaken following demolition works and the removal of the existing floor slab. This would comprise trial pits together with laboratory testing of soil samples, where appropriate, to confirm ground conditions and assess the presence of any contaminants.

6.71 The findings of the investigation would be assessed against appropriate commercial and industrial end-use criteria reflecting the proposed use of the site. Should any localised contamination be encountered, the report recommends proportionate remediation measures, including the excavation and disposal of affected materials where necessary.

6.72 The report also sets out a Discovery Strategy to be implemented during demolition and construction works. This would ensure that any previously unidentified contamination encountered during development is appropriately assessed and managed, with suitable mitigation and remediation measures implemented where required. Procedures for the handling, storage and disposal of contaminated materials and asbestos-containing materials are also identified.

6.73 Subject to the implementation of the recommendations contained within the Site Preparation Report, including the proposed intrusive investigation, Discovery Strategy and any remediation measures identified through future testing, the development can be safely delivered without unacceptable risks to human health, controlled waters or the wider environment. The proposal therefore accords with the objectives of Local Plan Policy DM23.

6.74 To note, a similar approach has been deemed acceptable as part of the Prior Approval for the demolition of the existing buildings on site.

Ecology

6.75 **London Plan Policy G6 (Biodiversity and Access to Nature)** seeks to protect and enhance biodiversity across London. The policy requires development proposals to avoid adverse impacts on designated ecological sites, habitats and species, and to manage ecological impacts through the mitigation hierarchy. Development should be informed by appropriate ecological information and seek opportunities to enhance biodiversity and access to nature where possible.

6.76 **London Plan Policy G7 (Trees and Woodlands)** seeks to protect and maintain London's urban forest and requires development proposals to retain existing trees of value wherever possible. Where tree removal is justified, appropriate replacement planting should be provided, and opportunities for additional tree planting should be incorporated into development proposals.

6.77 **Haringey Policy DM19 (Nature Conservation)** seeks to protect and enhance biodiversity, ecological networks and nature conservation interests across the borough. The policy requires development proposals to avoid harm to habitats and protected species and to demonstrate that any ecological impacts have been appropriately assessed and mitigated.

6.78 **Haringey Policy DM20 (Open Space and Green Grid)** seeks to protect and enhance the borough's green infrastructure network and encourages development proposals to contribute positively to biodiversity, habitat connectivity and the wider green grid.

6.79 The Preliminary Ecological Appraisal submitted in support of this application sets out that there is no on-site ecological habitat/value within the application boundary and that there is no impact on nearby ecological designations. It also confirms that enhancements to improve biodiversity value could include the installation of bird boxes and bug houses in the retained landscaping area to the north of the site.

6.80 The development will appropriately protect existing ecological interests, avoid unacceptable impacts on habitats and species, and contribute positively to the site's ecological value. The proposal therefore accords with the objectives of London Plan Policies G6 and G7 and Haringey Policies DM19 and DM20.

Biodiversity

6.81 Biodiversity Net Gain ("BNG") is a statutory requirement for any development permitted within England, subject to limited exemptions. The relevant legislation came into force on 12 February 2024 and are set out in Schedule 7A of The Town and Country Planning Act 1990, as inserted by Schedule 14 of the **Environment Act 2021**.

6.82 Under the Environment Act 2021, planning applications are required to achieve a BNG of 10 per cent since April 2024. However, there is a *de minimis* exemption for a development that does not impact a priority habitat and impacts less than:

- 25 square metres (5m by 5m) of on-site habitat; and
- 5 metres of on-site linear habitats such as hedgerows.

6.83 Paragraph 4 of *The Biodiversity Gain Requirements (Exemptions) Regulations 2024* is clear that a habitat is impacted where the habitat is lost or degraded such that there is a decrease in the biodiversity value of that habitat (4)(b). This is not considered to be the case.

6.84 As such, the proposed development is considered exempt from the provision of BNG.

7. Conclusion

7.1 This Planning Statement has been prepared on behalf of the Applicant in support of a full planning application submitted to the London Borough of Haringey for the following proposed development:

> *"Full planning application for the demolition of existing buildings and construction of a new substation."*

7.2 The site is located within the established Tottenham Commercial Park and designated as SIL. The proposed development comprises the demolition of existing buildings on site and the construction of a new substation to provide additional electricity capacity to support the continued operation, resilience, future requirements and intensification of the wider SIL and linked industrial sites across north London (including in the Lea Valley Property Market Area). Its development is considered to constitute the delivery of electricity infrastructure necessary to support future economic growth.

7.3 The demolition of the existing buildings has been approved under Prior Approval in November 2025 and the provision of new energy utilities infrastructure is an acceptable land use within SIL and in accordance with the Development Plan.

7.4 The substation has been designed to respond appropriately to its industrial setting and retains the existing access arrangements. Given its unmanned nature and limited operational activity, the proposal would not give rise to significant transport, traffic or other amenity-related impacts affecting the surrounding road network or any sensitive receptors.

7.5 The technical assessments accompanying the application demonstrate that the proposal is acceptable in respect of ecology, flood risk, drainage, noise and sustainability. The proposed development would incorporate energy efficient design measures, resource-efficient construction practices and climate resilience measures appropriate to the operational requirements of its future use. The pre-demolition audit confirms that the re-use and recycling of existing materials will be maximised.

7.6 Overall, the proposal continues to make effective use of an established industrial site and deliver strategic electricity infrastructure necessary to support the continued operation, resilience and future economic growth of the SIL and wider Property Market Area.

7.7 Taking these considerations into account, the proposal is considered to accord with the relevant national, regional and local planning policies and represents sustainable development. In accordance with **NPPF Policies DM3 and S4,** planning permission should therefore be granted without delay.

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