

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2023/0894

Ward: Northumberland Park

Address: 27-31 Garman Road N17 0UP

Proposal: Erection of two replacement units designed to match the original units following fire damage and demolition of the original units.

Applicant: Nachum Pshemish

Ownership: Private

Case Officer Contact: Sarah Madondo

Date received: 15/11/2023

Last amended date: 19/12/2024

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 employment space within a designated Strategic Industrial Location (SIL).
- The proposed scale and design of the development is appropriate within the context of the site and is considered of good quality, making a positive contribution to the visual amenity of the area.
- There would be no material adverse impacts on the amenity of surrounding residents.
- The development would provide a sufficient number of car and cycle parking spaces, which would encourage sustainable transport initiatives and include appropriate mitigation measures to minimise impacts upon the public highway.

2. RECOMMENDATION

2.1 That the Committee authorise the Head of Development Management & Planning Enforcement or the Assistant Director of Planning, Building Standards & Sustainability to **GRANT planning permission** subject to the conditions and informatives set out below and the completion of a legal agreement satisfactory to the Head of Development Management & Planning Enforcement or the Assistant Director of Planning, Building Standards & Sustainability, that secures the obligations set out in the Heads of Terms.

- 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 his 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 & Planning Enforcement or the Assistant Director for Planning, Building Standards and Sustainability, to make any alterations, additions or deletions to the recommended measures and/or recommended conditions 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.

Summary Lists of Conditions, Informatives and Heads of Terms

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

Conditions

1. Three-year time period limit
2. In accordance with approved plans
3. Materials
4. Land contamination
5. Unexpected contamination
6. NRMM
7. Construction Environmental Management Plan
8. Energy Strategy
9. Overheating
10. BREEAM Certificate
11. Secured by Design Accreditation
12. Secured by Design Certification
13. External lighting
14. Waste and recycling
15. Restriction of use
16. Drainage
17. Noise
18. Construction Management Plan
19. Delivery and Servicing Plan
20. Fire statement
21. Disabled Bays
22. Cycle Parking

Informatives

- 1) CIL liable
- 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 and;
- Carbon offset contribution - No Carbon Off-set Payment (and associated obligations) of £0, carbon offset contribution to be re-calculated at £2,850 per tCO2 plus a 10% management fee at the Energy Plan and Sustainability stages. (A mechanism to secure carbon offset contribution in case the development is no longer zero carbon)

2. Commercial Travel Plan

- The developer is required to pay a sum of £3,000 per year per unit (2 units), for the travel plans, for a period of 5 years at total of £30,000.

3. Employment Initiatives - participation and financial contribution towards Local Training and Employment Plan

- Apprenticeship support fees of £1,500; and
- Provision of financial contribution £13,094.51 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

- Provision of financial contribution of £15,000.

5. Highway Improvements

- S.278 Highways Works to include:
 - Reconstruction of the vehicle crossover;
 - Access to the Highways;
 - Measures for street furniture relocation;

- Carriageway markings;
- Access and visibility safety requirements; and
- Improved pedestrian and cycling infrastructure.

6. Monitoring Contribution

- 5% of total value contribution (not including monitoring);
- £500 per non-financial contribution; and
- 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 not 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 SI4 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, give 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 Garman 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 & Planning Enforcement (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 Assistant Director or Head of Development Management & Planning Enforcement 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.

CONTENTS

3. PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS
4. CONSULATION RESPONSES
5. LOCAL REPRESENTATIONS
6. MATERIAL PLANNING CONSIDERATIONS
7. CONCLUSION
8. COMMUNITY INFRASTRUCTURE LEVY
9. RECOMMENDATION

APPENDICES:

Appendix 1	Planning Conditions and Informatives
Appendix 2	Plans and Images
Appendix 3	Consultation Responses - Internal and External Consultees

3.0 PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS

3.1 Proposed development

- 3.1.1. This is an application for the erection of two replacement units designed to match the original units following fire damage and demolition of the original units.
- 3.1.2. The building would replace a previous structure on the site that was destroyed in a fire on 23rd May 2019, which affected the adjoining site nos. 21-25 Garman Road. The redevelopment of site would provide two separate commercial units. The units proposed are single-storey.

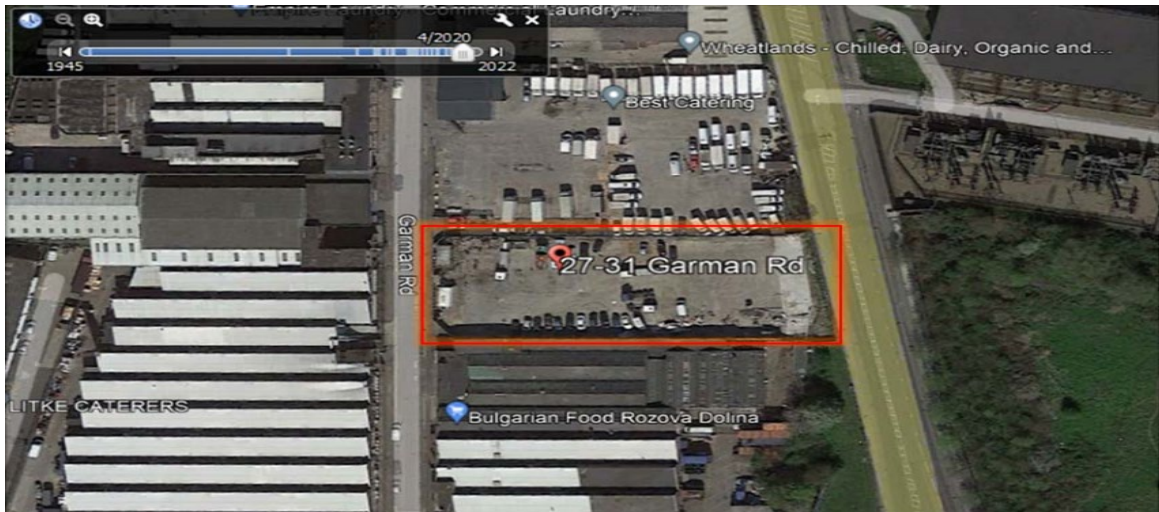


Image 1: Arial View - The site

3.2 Site and Surroundings

- 3.2.1 The application site consists of an empty site that was previously two commercial units; the immediate area is predominantly industrial in character. The site is not located within a conservation area and does not contain any statutorily or locally listed buildings. It is not located within proximity of any designated or non-designated heritage assets.
- 3.2.2 The site is within a designated Strategic Industrial Location (SIL) and within Flood Zone 2. The adjacent land to the east is within the Lea Valley Regional Park and designated as a SINCC (Site of Importance for Nature Conservation) Grade I land. The site lies within the Tottenham Area Action Plan and is within an Archaeological Priority Area.



Image 2: Birds Eye View of Existing Industrial Area

- 3.2.3 The site has a Public Transport Accessibility Level (PTAL) rating of 2 indicating that its access to public transport is poor suggesting that there will be a strong reliance on the private car for trips. The development site is located within the Tottenham Event Day CPZ, that restricts parking to permits holders only when events are on at the local Tottenham Hotspur Stadium to the following restrictions Monday to Friday 17:00 - 20:00, Saturday - with further restrictions in place at the weekend and bank holidays.



Image 3: Site location Plan

3.3 Relevant Planning History

- 3.3.1 HGY/2017/1046 - Change of Use of Unit A from Warehouse (B8/B2) to a bakery (B1/B2) including the erection of a first-floor extension to the front of the building. **Permission granted on 09/5/2017.**
- 3.3.2 HGY/2019/2843 Rear of Unit B - Reconstruction of the industrial unit (to replace that of a previously destroyed unit) for purposes of plastic recycling (B2) use. **Permission granted on 15/1/2020.**
- 3.3.3 HGY/2021/2248 - Erection of two replacement B1/B2/B8 units following fire damage and demolition of the original units. **Permission granted on 14/9/2022.**

Relevant adjoining sites:

- 3.3.5 HGY/2020/3186 - Erection of two-storey replacement light industrial unit. **Permission granted on 30/8/2022.**

4.0 CONSULTATION RESPONSES

4.1 Application Consultation

- 4.1.1 The following were consulted regarding the application:

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

INTERNAL:

- 1) LBH Transport: No objection, subject to conditions and obligations.
- 2) LBH Carbon Management: No objection, subject to conditions and obligations.
- 3) LBH Waste Management: No objection, subject to condition.
- 4) LBH Building Control: No comments received.
- 6) LBH Pollution Air Quality: No objection, subject to conditions.
- 11) LBH Inclusive Economy: No objection.
- 12) LBH Design: No objection
- 13) LBH Pollution: No objection
- 14) Cllr Bevan: submitted the following comments:
 - I note the uniformity of the design and materials / mainly brick that add to the attractiveness of this industrial estate. I would request that this uniformity is not negatively affected by any changes to the proposals / designs / pictures that have been submitted to me.

EXTERNAL

- 15) Thames Water: No objection, subject to informative/s regarding sequential approach, sewers, groundwater discharge etc.
- 16) London Fire Brigade: No objection.
- 17) Designing Out of Crime: No objection subject to conditions.

5.0 LOCAL REPRESENTATIONS

5.1 The following were consulted:

Neighbouring properties:

Site notices were erected in the vicinity for 21 days.

5.2 No representations were received from neighbours, local groups etc in response to notification and publicity of the application.

6.0 MATERIAL PLANNING CONSIDERATIONS

6.1.1 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 and Ecology/Biodiversity
7. Flood risk and drainage;
8. Air quality and Land contamination;
9. Waste and recycling;
10. Employment and Training;
11. Fire Safety and
12. Conclusion

6.2 Principle of the development

6.2.1 The site is designated as a Strategic Industrial Location (SIL) (DEA2) 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).

6.2.2 The National Planning Policy Framework (NPPF 2024) 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.

6.2.3 The London Plan (2021) Policy E5 states that development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis.

6.2.4 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.

6.2.5 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 of industrial uses. 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.

6.2.6 In addition, the Council will also:

- Support local employment and regeneration aims;
- Support environment policies 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.

6.2.7 Policy DM37 Part A of the Development Management DPD states that, within SIL 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;
- Allows for future flexibility for a range of business types and sizes;
- Provides adequate space for on-site servicing and vehicle waiting/ movements; and
- Improves and enhances the quality of the local environment and business area; and

- Demonstrably improves the functionality of the site for employment purposes 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.

6.2.8 The proposed development will provide 1,145 sqm replacement E/B2/B8 use. There is no increase on the amount of floorspace, which previously existed on the site (circa 1,145 sqm). The warehouse was previously divided into 2 units, which is also proposed in the scheme. The proposal has been designed to meet the needs of various types and sizes of occupiers and will secure the redevelopment of this vacant site and contribute to the delivery of good quality employment floorspace in Haringey.

6.2.9 Overall, the rebuilding of the site will regenerate this part of the estate and return employment opportunities to the site. The proposed development will therefore contribute to addressing the Council's employment needs for the local population, in accordance with the aforementioned policies. Given the policy support of the proposed use, which remains the same land use as the previous land use of the site, the proposed development is considered acceptable in principle.

Link to adjoining SINC

6.2.10 The site is adjacent to the designated Site of Importance for Nature Conservation (SINC) and the Lee Valley Regional Park areas however there is a buffer between the site and these designated sites by virtue of the highway. The height and scale of the proposed building would be the same as that which was destroyed by fire and the nature of the business would remain within the previous use class. As such, it is not considered to significantly impact these areas.

6.3 Design and Appearance

6.3.1 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.

6.3.2 Pre-demolition plans show this building had a similar bulk and similar saw-tooth design to those of the surrounding buildings, which have also been demolished.



Image 4: Photograph of Fire Damage Unit June 2019

- 6.3.3 The proposal is for the erection a single storey like for like building comprising of two units with office space and storage. The building would be 7 metres at its highest point similar to the previously existing building. The building would be finished in red brick at the front elevation to match the original buildings in surrounding area with a saw-tooth roof. The windows are proposed to be the same as the original, being white double glazed UPVC units. All shutters are to be finished in a raw aluminium finish. The window cill and ribbon running horizontally across the building located above the windows will also be finished in white to match the original design.
- 6.3.4 Overall, officers consider that the proposed development would be acceptable in design terms. This simple industrial design is considered in keeping with the style and character along this industrial estate.



Image 5: Appearance of buildings & materials

6.4 **Impact on amenity of neighbouring properties**

- 6.4.1 London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, specifically it sets out that proposals should provide sufficient daylight and sunlight to surrounding housing, while also minimising overshadowing. Furthermore, new noise generating development should put in place measures to

mitigate and manage noise impacts for neighbouring residents and businesses, in line with London Plan Policies D13 and D14.

- 6.4.2 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. DPD Policy DM1 also requires proposals to address issues of vibration, noise, fumes and odour.
- 6.4.3 The nearest residential property is some 200 metres from the site on Park Avenue Road, therefore there is no impact. The use of the site would not change from that of the previous use of the site and will be wholly compatible with the Strategic Industrial Location designation of the site. Given that the neighbouring sites are wholly industrial it is not considered they would be any adverse impact in terms of overlooking issues.

6.5 Parking and highway safety

- 6.5.1 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 car parking. The maximum parking standards, outlined in Table T6.2 of the London Plan, should be applied to this proposal. The standards for non-residential disabled persons parking are identified in Table 10.6 of the London Plan.
- 6.5.2 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'.
- 6.5.3 The site has a Public Transport Accessibility Level (PTAL) rating of 2 indicating that its access to public transport is poor suggesting that there will be a strong reliance on the private car for trip making. The development site is located within the Tottenham Event Day CPZ, that restricts parking to permit holders only when events are on at the local Tottenham Hotspur Stadium. The following restrictions apply: Monday to Friday 17:00 - 20:30, Saturday to Sunday 08:00 – 20:00 and bank holidays 12:00 – 20:00.

Parking and access

- 6.5.4 At present there are CPZ bays to both sides of Garman Road in the vicinity of the site access along with a length of double yellow lining across the existing site crossover. This is quite a wide crossover and the eventual appropriate highway arrangements including the site access are yet to be determined.

- 6.5.5 The proposal includes two blue badge parking spaces. The details of these will need to be secured by condition. The applicant also proposes internal long stay and external short stay cycle parking. Therefore, cycle parking is recommended to be conditioned. Roller shutters are designed to be set back 14m from the public highway which would enable delivery and service vehicles to access from the highway and be completely contained within the site for loading/unloading. The largest vehicle to visit the site according to the submission documents is a 7.2m long sprinter van. There are no proposals to alter the existing highway crossover and site access arrangements off Garman Road.
- 6.5.6 With regards to refuse and recycling storage and collection arrangements, the applicant will need to ensure they meet the requirements of Haringey's waste team and from the transportation perspective, it will need to be clarified if a private contractor will be utilised or whether the Council will collect. In any instance the applicant will need to provide full details including the location and predicted duration of any collection vehicle dwelling on the highway.
- 6.5.7 A Delivery and Servicing plan will be required and covered by pre commencement condition. This will need to include full layout details of the highway area that will be used for deliveries and servicing, and this will need to include swept path plots and demonstrate that all delivery and service vehicles can access, egress and manoeuvre within the site, and that the on site parking/dwell arrangements will be sufficient to meet all demands off of the public highway.

Trip generation

- 6.5.8 In overall transportation impact terms, it is noted that the floor area of replacement B1/B2/B8 in total will be lower than what existing previously on the site. It is also noted that it will be the same use class and that one of the future occupiers will be Finebake. Therefore, in overall transportation impact terms, this proposal is likely to have a slightly reduced transportation impact than the previous arrangements. So should not result in uplifts in trip numbers onto the highway and public transport networks.
- 6.5.9 Some trip generation information has been included, which references for the previous 1041 sqm building, 5 two ways trips in the AM and PM peaks, and between 30 to 40 on a daily basis. The conclusion is that there will be a slight reduction compared to this.
- 6.5.10 Subject to the conditions and obligations as indicated, officers consider that the proposed scheme would not have any undue impacts on the road network, and through the inclusion of cycle parking, would encourage the uptake of sustainable modes of transport.

6.6 Energy and Climate Change

- 6.6.1 The NPPF requires development to contribute to the transition to a low carbon future and to reduce energy consumption.

- 6.6.2 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 development to adopt sustainable design and construction techniques to minimise impacts on climate change and natural resources.

Carbon Reduction

- 6.6.3 The applicant has submitted an Energy & Sustainability Statement, which was reviewed by the Climate Change Officer. They note that the development achieves a reduction of 122% carbon dioxide emissions on site, which is supported in principle. The development is proposing solar panels and air source heat pumps to be secured via a condition.
- 6.6.4 In order to optimise carbon emission mitigation and sustainability, pre-commencement energy and sustainability plans are secured via a legal agreement. In addition, a carbon offsetting contribution has been agreed (and secured via legal agreement) to achieve a zero-carbon development.

BREEAM

- 6.6.5 The applicant has also prepared a BREEAM Pre-Assessment Report for the development. Based on this report, a score of 61.4% is expected to be achieved, equivalent to 'Very Good' rating. It is recommended to aim for "Excellent" rating and this is supported subject to a condition.

Overheating

- 6.6.6 In terms of overheating, the applicant has submitted a revised report, which has been reviewed by the Council's Climate Change Officer. Officers note, that the revised overheating statement now includes both modelling with and without active cooling to passive mitigation measures have been maximised to reduce the risks of overheating before introducing any mechanical form of cooling. A condition would be attached to secure overheating mitigation measures.
- 6.6.7 The proposal satisfies development plan policies and the Council's Climate Change Officer supports this application subject to the conditions and obligations. As such, the application is considered acceptable in terms of its sustainability.

6.7 Urban Greening and Ecology/Biodiversity

- 6.7.1 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.

- 6.7.2 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.
- 6.7.3 Policy DM1 of the local plan requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to respond to trees on or close to a site. Policy DM21 of the local plan expects proposals to maximise opportunities to enhance biodiversity on-site.
- 6.7.4 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.
- 6.7.5 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 on the land of the previous development and covered by a concrete hard standing (sealed surface) that is now used as a car park. 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. Furthermore, the application was submitted before BNG came into effect for major applications on the 12th February 2024.

6.8 Flood Risk and drainage

- 6.8.1 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 local plan seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage.
- 6.8.2 The site is located within Flood Risk Zone 2 as defined by the Environment Agency. As the proposal is for Commercial industrial use, the development will be classified as a 'less vulnerable' development by the Flood Risk Vulnerability Classification (Annex 3) in the National Planning Policy Framework (NPPF 2024). The applicant has submitted a Flood Risk Assessment and drainage strategy.
- 6.8.3 The DPD Policy DM24 seeks that "All proposals for new development within Flood Zone 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." The site is Flood Risk Zone 2.
- 6.8.4 In this instance, the site is previously developed, and no further hardstanding is proposed. As such, no flood risk assessment was considered to be required in this instance. Accordingly, a condition to secure a drainage system and its details is recommended.
- 6.8.5 The site is within a critical drainage area but the area of hardstanding does not increase. DPD Policy DM26 states that *'All proposals for new development within a Critical Drainage Area (CDA) will be required to incorporate measures to reduce the overall level*

of flood risk in the CDA. A condition is recommended in order to secure future adequate levels beyond those existing.

6.8.6 Thames Water raises no objection; however, require further information on drainage arrangements for this property, which has been noted. A condition will be attached for the applicant to submit a drainage strategy prior to commencement of works.

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

6.9 Air Quality and Contamination

Air Quality

6.9.1 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.

6.9.2 The Carbon Management/Pollution Team has been consulted and raise no objection on these grounds.

Land Contamination

6.9.3 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.

6.9.4 The Council's 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.

6.10 Waste and Recycling

6.10.1 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, requires development proposals make adequate provision for waste and recycling storage and collection.

6.10.2 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 will be attached.

6.11 Employment and Training

6.11.1 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 a support towards recruitment costs for apprenticeships and one full time apprenticeship per development. All these requirements would be secured by agreement.

6.11.2 The applicant has indicated that the development would provide 1,145sqm of employment floor space for flexible E, B2 and B8 use. The development of site would be like for like, therefore, the numbers of jobs would not increase, but rather the 10 jobs that were lost would be re-provided.

6.11.3 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. The applicant has agreed to provide employment opportunities during the construction of the development, and this would be secured by legal agreement. As such, the development is acceptable in terms of employment provision.

6.12 Fire Safety

6.12.1 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.

6.12.2 The applicant has not provided a Fire Statement; however, officers consider that this can be conditioned and recommend the provision of this prior to occupation and in line with secure-by-design comments and London Fire Brigade Informatives.

7.0 CONCLUSION

The proposal in accordance with relevant land use and employment policy and has the potential to re-provide lost jobs, following the fire. The provision of good quality industrial space is supported. In all other respects the development is considered acceptable subject to mitigation provided by recommended conditions and S106 obligations. All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION.

8.0 COMMUNITY INFRASTRUCTURE LEVY (CIL)

Based on the information given on the plans, the Mayoral CIL charge will be £81.398.05 (1,145 x £71.09) and the Haringey CIL charge would be £0 as the use is subject to a Nil Rate.

9.0 RECOMMENDATION

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

APPENDIX 1 - Planning Conditions and Informatives

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.
2. The development hereby authorised shall be carried out in accordance with the following approved plans and specifications:

PR-L001	Proposed OS Map
PR-E-001	Proposed West Elevation
PR-E002	Proposed North Elevation
PR-E003	Proposed South Elevation
PR-S00	Proposed Long Section
PR-S002	Short Section
PR-P001	Ground Floor Plan
PR-P002	Proposed Roof Plan
PEX-L001	Pre-Existing OS Map
PEX-E001	Pre-Existing West Elevation
PEX-E002	Pre Existing North Elevation
PEX-E003	Pre Existing South Elevation
PEX-P001	Pre Existing Ground Floor Plan
PEX-P002	Pre Existing Roof Plan

Materials

3. Samples of materials to be used for the external surfaces, rainwater goods 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 should 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 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:
 - a. A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information.
 - b. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The

desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority.

- c. If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.
- d. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.
- e. Where remediation of contamination on the site is required, completion of the remediation detailed in the 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 the development can be implemented and occupied with adequate regard for environmental and public safety.

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 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.

NRMM

- 6.
 - a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NO_x and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <http://nrmm.london/>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.
 - b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details

proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.

Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.

Construction Environmental Management Plan

7. Development shall not commence 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 above:

a) The CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).

b) The CEMP shall provide details of how construction works are to be undertaken respectively and shall include:

- i. A 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 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.

c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:

- i. Monitoring and joint working arrangements, where appropriate;
- ii. Site access and car parking arrangements;
- iii. Delivery booking systems;
- iv. Agreed routes to/from the Plot;
- v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and
- vi. Travel plans for staff/personnel involved in construction works to detail the measures to encourage sustainable travel to the Plot during the construction phase; and
- vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.

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 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 must be sent to the Local Planning Authority prior to any 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.”

Energy Strategy

8. The development hereby approved shall be constructed in accordance with the Energy Statement version 3 prepared by Archieve Green (dated 26 June 2024) delivering a minimum 135% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, air source heat pumps (ASHP) and a minimum 56 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 fabric efficiencies will meet the proposed targets:
- Floor u-value - 0.10 W/m²K
- External wall - 0.24 W/m²K
- Pitched roof – 0.16 W/m²K
- Flat roof – 0.15 W/m²K
- Vehicle Access door – 1.3 W/m²K
- Windows - 1.40 W/m²K
- g-value of 0.40, LT – 0.60
- Air permeability rate of 3 m³/hm² @50Pa
- Detailed BRUKL calculations for the non-residential element of the development, demonstrating how it will exceed the 15% improvement on Building Regulations under Be Lean;
- Details to reduce thermal bridging;
- 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;
- 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;
- 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 relevant block. Six months following the first occupation of that block, 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

9. Prior to occupation of the development, details of external/internal blinds to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the blinds, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development or replace the blinds with equivalent or better shading coefficient specifications.

The following overheating measures must be installed prior to occupation and be retained for the lifetime of the development to reduce the risk of overheating in habitable rooms in line with the Thermal Comfort BREEAM Hea 04 prepared by Archieve Green (dated 15 Oct 2024):

- Floor u-value - 0.10 W/m²K
- External wall - 0.24 W/m²K
- Pitched roof – 0.16 W/m²K
- Flat roof – 0.15 W/m²K
- Vehicle Access door – 1.3 W/m²K
- Natural ventilation, with 100% openable windows and 50% openable doors.

- Glazing u-value of 1.40 W/m²K and g-value of 0.40, LT – 0.60
- Mechanical Extract ventilation of 1l/s/m²
- Active Cooling

If the design is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.

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.

BREEAM Certificate

10. a) Prior to commencement on site for the relevant non-residential unit, 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 “Very Good” outcome (or equivalent), aiming for “Excellent”. 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 “Very Good” outcome (or equivalent), aiming for “Excellent”, 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.

Secured by Design Accreditation

11. 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 guidelines 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.

Reason: In the interest of creating safer, sustainable communities.

Secure by design certification

12. 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.

External Lighting

13. Prior to the commencement of above ground works on site full details of the all proposed external lighting 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 additional shielding to minimise obtrusive effects.

The approved scheme is to be fully completed and shall be permanently maintained thereafter.

Reason: In the interest of design quality, residential amenity and public and highway safety.

Waste and recycling

14. Prior to occupation of the development, a detailed scheme for the provision of refuse and waste storage and recycling facilities has been submitted to and approved in writing by the Local Planning Authority. Such a scheme as approved shall be implemented and permanently retained thereafter.

Reason: In order to protect the amenities of the locality and to comply with Policy DM4 of The Development Management DPD 2017 and Policy SI7 of the London Plan 2021.

Restriction of use

15. Notwithstanding the provisions of the Town & Country Planning (Use Classes) Order 1987, or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the premises shall be restricted to industrial (Use Class B2);

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.

Drainage

16. Prior to commencement of development on site a plan for sustainable drainage and improvements for the flood risk of the area and safe disposal and sustainable use of water on site. The development shall be provided as approved and retained as such thereafter.

Reason: To ensure the critical drainage and flood risk is improved in accordance with policies DM26 and DM27 of the DPD (2017).

Noise

17. 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 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.

Construction Management Plan

18. Prior to the commencement of development, a Construction Management Plan (including a 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 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 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. To protect of the amenity of neighbour properties and to main traffic safety.

Delivery and Servicing Plan

19. Prior to the commencement of development, a Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority. The document shall include the following matters:

- a) Identifying where safe and legal loading and unloading can take place;
- b) Ensuring delivery activities do not hinder the flow of traffic on the public highway;
- c) Managing deliveries to reduce the number of trips, particularly during peak hours;
- d) Minimising vehicles waiting or parking at loading areas so that there would be a continuous availability for approaching vehicles; and
- e) Using delivery companies who can demonstrate their commitment to best practice through the Fleet Operator Recognition Scheme (FORS).

Reason: To set out the proposed delivery and servicing strategy for the development, including the predicted impact of the development upon the local highway network and both physical infrastructure and day-to-day policy and management mitigation measures. To ensure that delivery and servicing activities are adequately managed such that the local community, the pedestrian, cycle and highway networks and other highway users experience minimal disruption and disturbance. To enable safe, clean and efficient deliveries and servicing.

Fire Statement

20. Prior to commencement of development on site, a plan for fire safety statement shall be submitted and approved by Council. The development shall be provided as approved and retained as such thereafter.

Reason: in the interest of safety and protection of amenities in accordance with London Plan Policy D12.

Disabled parking bays

21. Prior to occupation the applicant will be required to submit and provide plans showing 2 disabled bays for the commercial units having access to a wheelchair accessible car parking spaces 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.

Cycle Parking

22. No development shall take place until details of the type and location of secure and covered cycle parking facilities have been submitted to and approved in writing by the

Local Planning Authority. The development shall not be occupied until the all cycle parking spaces for users of the development (10 no. short-stay, 10 no. long-stay cycle, including 4 cargo bike parking spaces) have been installed in accordance with the approved details. Such spaces shall be retained thereafter for this use only.

Reason: To promote sustainable modes of transport in accordance with policy T5 of the London Plan 2021 and Policy SP7 of the Haringey Local Plan 2017.

INFOMATIVES

INFORMATIVE: COMMUNITY INFRASTRUCURE LEVY (CIL)

Based on the information given on the plans, the Mayoral CIL charge will be £81.398.05 (1,145 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.

INFORMATIVE: 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.

INFORMATIVE: 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.

INFORMATIVE: 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.

INFORMATIVE: 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.

INFORMATIVE: 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 occupier.

INFORMATIVE: 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.

INFORMATIVE: 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.

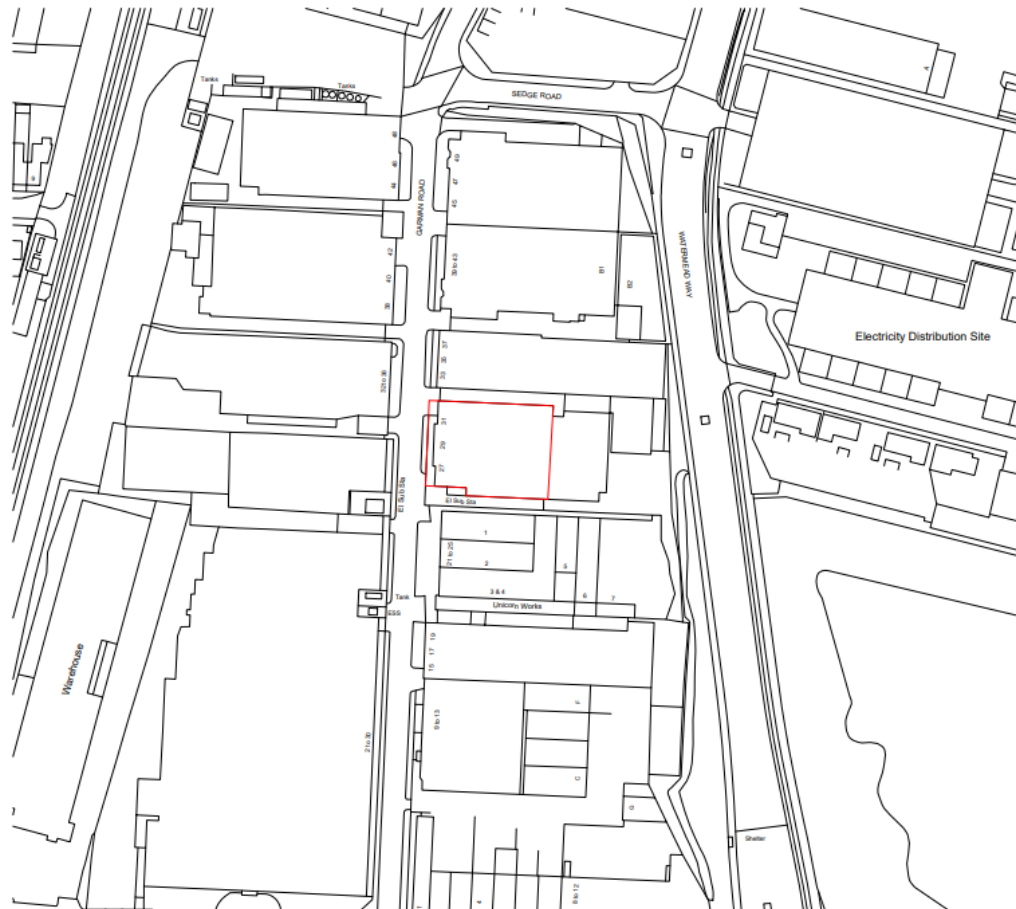
INFORMATIVE: Secure by Design

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.

INFORMATIVE: Street Numbering

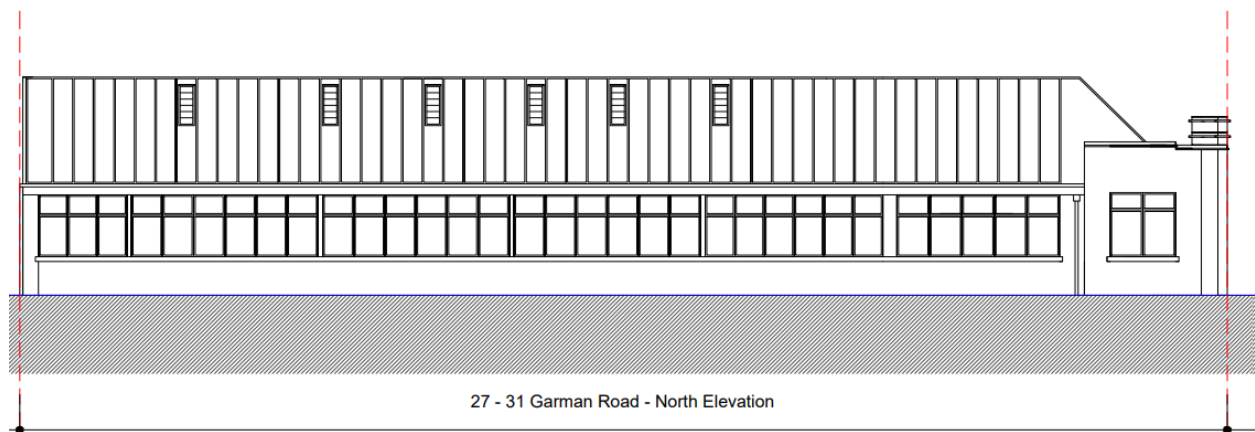
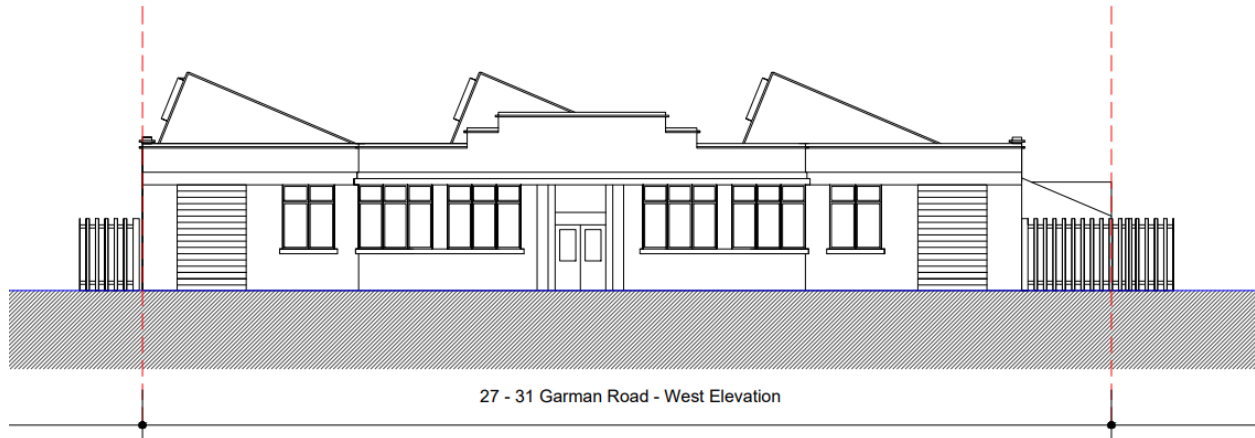
The new development will require numbering. The applicant should contact the Local Land Charges at least six weeks before the development is occupied (tel. 020 8489 3472) to arrange for the allocation of a suitable address.

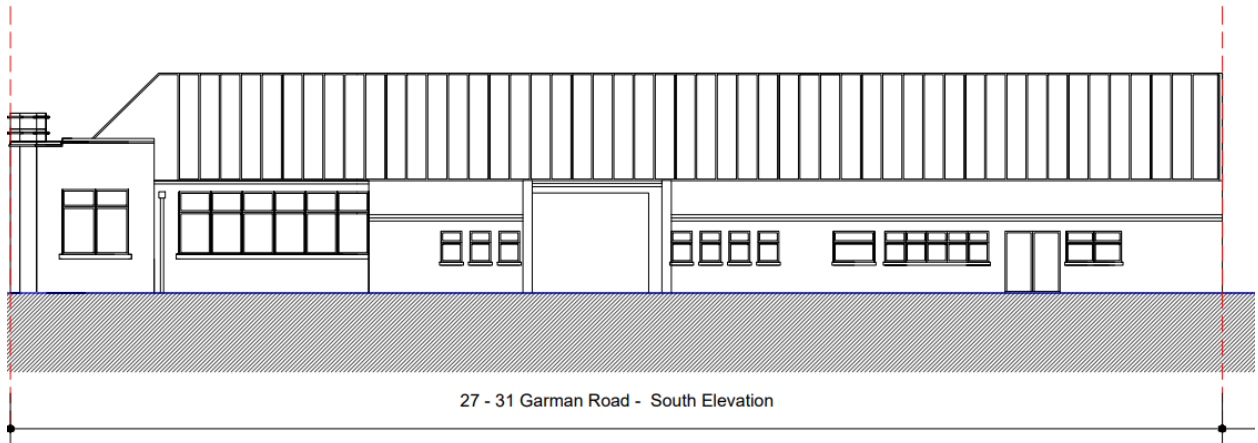
Appendix 2 - Plans and images



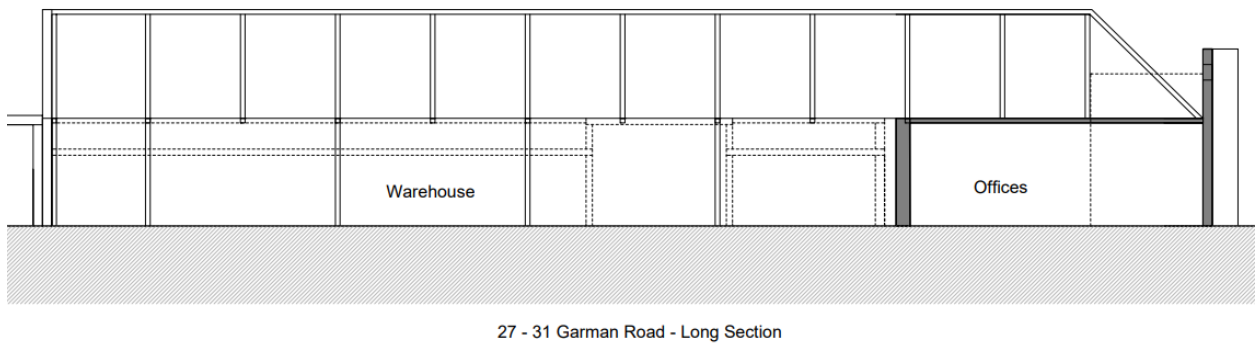
Site location plan

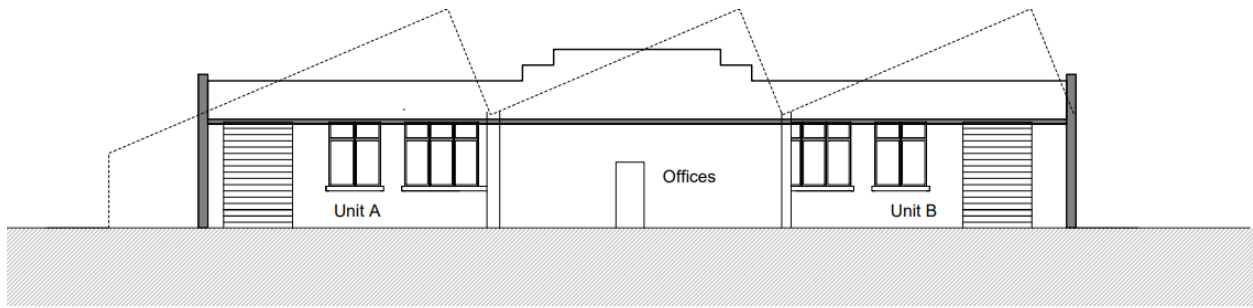
Elevations & Sections





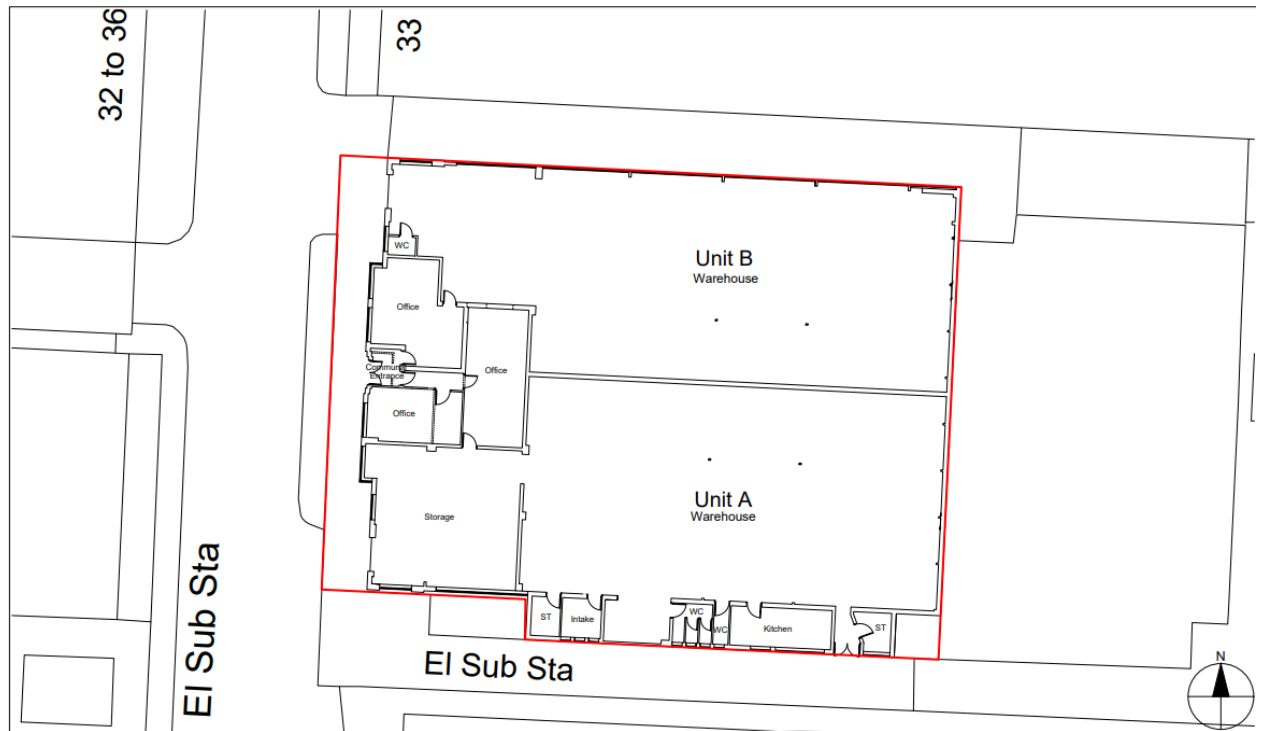
SECTIONS



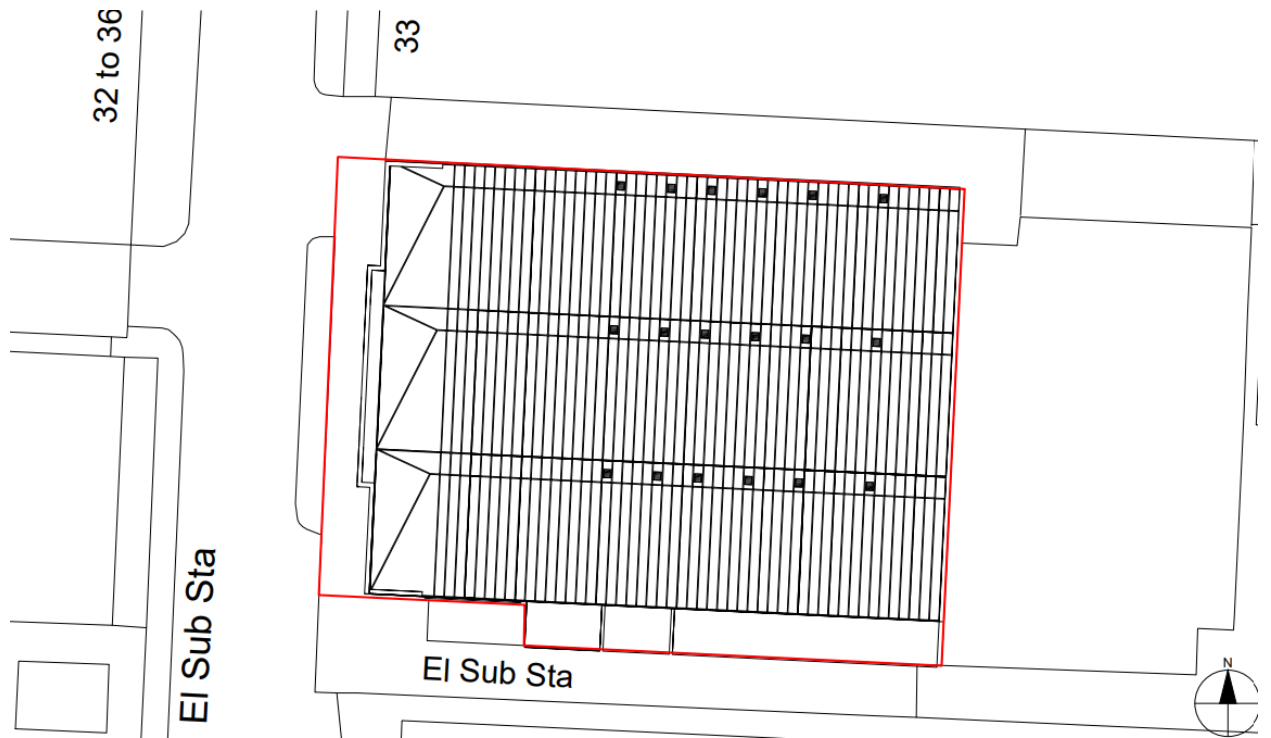


27 - 31 Garman Road - Short Section

Ground Floor Plan



Roof Plan



Photographs of site



Photograph of pre-existing building



Appendix: 3 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Design Officer	This is replacement for like for like, therefore no design comments required.	Support noted.
Transportation		Support noted. Conditions 18, 19, 21 & 22 S106 obligations.

Stakeholder	Question/Comment	Response				
Carbon Management	Carbon Management Response 21/03/2024 In preparing this consultation response, we have reviewed: • Energy Statement prepared by Archieve Green (dated 20 June 2023) • Relevant supporting documents. 1. Summary The development achieves a reduction of 122% carbon dioxide emissions on site, which is supported in principle. However, the Carbon Management cannot currently support this application. The development does not currently meet: • London Plan Policy SI4 and Local Plan DM21: no dynamic thermal modelling was undertaken to reduce the overheating risk and reduce the impact on the urban heat island. • Local Plan Policy SP4: no submission of a BREEAM Pre-Assessment, demonstrating that at least a rating of ‘Very Good’ can be achieved, aiming for ‘Excellent’. • London Plan Policies G5, G6 and Local Plan DM21: no urban greening or biodiversity net gain. Further information needs to be provided to address this objection. This should be addressed prior to the determination of the application. 2. 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 CO2 emissions for the development shows an improvement of approximately 122% in carbon emissions with SAP10 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 1.0 tonnes of CO2 from a baseline of 0.8 tCO2/year. London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. Non-residential (SAP10.2 emission factors) <table><tr><td>Total regulated emissions</td><td></td></tr><tr><td>(Tonnes CO2 / year)</td><td>CO2 savings</td></tr></table>	Total regulated emissions		(Tonnes CO2 / year)	CO2 savings	Support noted. Condition 8,9,10 attached and S106 mitigations.
Total regulated emissions						
(Tonnes CO2 / year)	CO2 savings					

Stakeholder	Question/Comment	Response
	(Tonnes CO2 / year) Percentage savings (%) Part L 2021 baseline 0.8 Be Lean 0.6 0.2 25% Be Clean 0.6 0.0 0% Be Green -0.2 0.8 97% Cumulative savings 1.0 122% Carbon shortfall to offset (tCO2) No shortfall Carbon offset contribution 10% management fee Actions: - Please submit the GLA's Carbon Emission Reporting Spreadsheet. - Please submit BRUKL sheets for a representative selection of the development for the Be Lean and Be Green scenarios. Energy Use Intensity / Space Heating Demand Applications are required to report on the total Energy Use Intensity and Space Heating Demand, 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. Building type EUI (kWh/m2/year) Space Heating Demand (kWh/m2/year) Methodology used Actions: - What is the calculated Energy Use Intensity (excluding renewable energy)? How does this perform against GLA benchmarks, i.e. at 55 kWh/m2/year? Please submit the information in line with the GLA's reporting template. - What is the calculated space heating demand? How does this perform against the GLA benchmark of 15 kWh/m2/year? Please submit the information in line with the GLA's reporting template. Energy – Lean	

Stakeholder	Question/Comment	Response
	The applicant has proposed a saving of 0.2 tCO₂ in carbon emissions (25%) through improved energy efficiency standards in key elements of the build, based on SAP10.2 carbon factors. This goes beyond the minimum 15% reduction respectively set in London Plan Policy SI2, so this is supported. The following u-values, g-values and air tightness are proposed: Floor u-value 0.10 W/m²K External wall u-value 0.24 W/m²K Roof u-value 0.15/16 W/m²K Door u-value 1.30 W/m²K Window u-value 1.40 W/m²K G-value 0.60 Air permeability rate 3 m³/hm² @ 50Pa Ventilation strategy TBC Waste Water Heat recovery? TBC Thermal bridging Accredited Construction Details Low energy lighting 100% Heating system (efficiency / emitter) ASHP with SCOP 4.35/SEER 5.50 Thermal mass TBC Actions: - Please specify the heating strategy and ventilation system assumed under the Baseline and Be Lean scenarios (including the gross efficiency figure(s)). For non-residential applications the baseline should align with the proposed heating system, i.e. if proposing an air source heat pump, this should be specified with the efficiency values set out in Part L 2021 for that system under Be Lean. - If proposed, please identify on a plan where the MVHR units will be located within the buildings. The units should be less than 2m away from external walls. This detail can also be conditioned. - How is lighting energy demand improved? Should consider daylight control and occupancy sensors for communal areas. - What is the proportion of glazed area? Consider following the LETI Climate Emergency Design Guide principles in façade design. - The fabric efficiencies and thermal bridging should be improved upon to reduce heat losses. - If the air tightness of the scheme is improved, mechanical ventilation with heat recovery could be proposed to further reduce heat losses.	

Stakeholder	Question/Comment	Response
	- Set out how the scheme's thermal bridging will be reduced. [if below 0.15, check how/why. No measures are proposed to reduce heat loss from junction details, and it does not set out the what the proposed Psi (Ψ) value is. - Submit the individual end use BER for specific end users in line w CIBSE Guide F. 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 applicant is not proposing any Be Clean measures. The site is not within reasonable distance of a proposed Decentralised Energy Network (DEN). A Combined Heat and Power (CHP) plant would not be appropriate for this site. 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 0.80 tCO₂ (97%) reduction of emissions are proposed under Be Green measures. The solar array peak output would be 21kWp. The air-to-water ASHP systems (min. SCOP of 4.35 and SEER of 5.50) will provide hot water and heating to the development. Actions:	

Stakeholder	Question/Comment	Response
	- Please provide some commentary on how the available roof space has been maximised to install solar PV. Has your feasibility shown that other roofs will not be viable / will they be used for other purposes? Only XX% of the roof space has been used. - How much of the roof area will be covered approximately, what is the assumed efficiency, angle and orientation of the panels? - How will the solar energy be used on site (before surplus is exported onto the grid)? - A living roof should be installed under the solar PV, or if this is not feasible, the roof should be light coloured to reduce solar heat gains and the improve efficiency of the solar panels. - Please identify on the plans where the air source heat pumps will be located and how the units will be mitigated in terms of visual and noise impact. - How much of the heating/hot water demand will be met by the proposed types of heat pumps? If this cannot be met fully, how will this be supplemented? 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 applicant should install metering equipment on site, with sub-metering by non-residential unit. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents/businesses. - What are the unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters, battery storage? - 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) 3. Carbon Offset Contribution No carbon shortfall remains. 4. Overheating	

Stakeholder	Question/Comment	Response
	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. No thermal dynamic overheating assessment has been done. The SAP methodology is not sufficient to assess overheating risk. Actions: - Demonstrate the cooling hierarchy has been followed - o Internal heat generation, i.e. heat distribution infrastructure - o Heat entering building, i.e. shutters, trees, vegetation, blinds - o Manage heat through thermal mass and high ceilings - o Passive ventilation, i.e. openable windows, shallow floorplates, dual aspect, stack effect - o Mechanical ventilation, i.e. free cooling from outside air in shade, by-pass summer mode - Undertake a Thermal Dynamic Overheating Assessment to demonstrate any potential overheating risk has been mitigated. This must be done in line with CIBSE TM52 with TM49 LWC weather files. - The assumptions and inputs should be clearly reported within the overheating assessment. - Model the following most likely to overheat rooms: - o All office spaces - o Communal spaces; - o Heat losses from pipework and heat interface units for community heating systems - Model all three Design Summer Years 1-3 (DSY), in the urban dataset; - Model all future weather patterns to projected impacts over the time periods 2020s, 2050s and 2080s, the risks, impacts and mitigation strategy set out for each; - Implement mitigation measures and demonstrate compliance with DSY1 for 2020s weather file (high emissions, 50% percentile); - Set out a retrofit plan for future weather files, demonstrating how these measures can be installed and who will be responsible for overheating risk. 5. Sustainability Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. No sustainability statement is submitted.	

Stakeholder	Question/Comment	Response
	The sustainability section should set out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design. Action: - Set out what urban greening and biodiversity enhancement measures will be proposed (e.g. green infrastructure, bird boxes, bat boxes etc to connect to the green spaces around the site, living roofs, living walls, etc.) - How will the development increase staff uptake of active travelling (through cycle facilities). Demonstrate what safe, dry and accessible cycle parking is proposed. - What electric vehicle charging points are proposed? This allows the future-proofing of the development by ensuring the required power has been installed. - A target (%) for responsible sourced, low-impact materials used during construction. - Set out how any demolition materials can be reused. - Set out how water demand will be reduced, e.g. rainwater harvesting, grey water system. - Set out how surface water runoff will be reduced, that it will be separated from wastewater and not discharged into the sewer. - Climate change mitigation should also be considered for the external spaces (shading, etc) and the impact of the increase in severity and frequency of weather events on the building structures. 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. BREEAM Pre-Assessment Report is not submitted. Actions: - Submit the BREEAM Pre-Assessment report. - A table should be submitted to demonstrate which credits will be met, how many are met out of the total available, under which category, which could be achieved and which will not be met. This needs to include justification where targets are not met or ‘potential’ credits (where they are available under the Shell and Core assessment). This will enable better assessment of which credits. Urban Greening / Biodiversity	

Stakeholder	Question/Comment	Response
	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. No UGF statement and BNG calculation submitted. Actions: - Please submit the Urban Greening Factor - Please provide the biodiversity net-gain calculation. It is recommended to use the Biodiversity Metric 4.0. The calculation tools and user guide for the biodiversity metric are published on Natural England's Access to Evidence website. The user guide describes how to gather the information needed for the metric calculations. https://nepubprod.appspot.com/publication/6049804846366720 6. Planning Conditions To be secured (with detailed wording TBC) Energy strategy - Overheating - BREEAM Certificate - Living roof(s) - Biodiversity 7. Planning Obligations Heads of Terms - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - If relevant, Estimated carbon offset contribution (and associated obligations), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO₂ at the Energy Plan and Sustainability stages.	

Stakeholder	Question/Comment	Response																																
	Carbon Management Response 05/06/2024 In preparing this consultation response, we have reviewed: • Energy Statement prepared by Archieve Green (dated 20 June 2023) • Thermal Comfort BREEAM Hea 04 prepared by Archieve Green (dated 22 May 2024) • Relevant supporting documents. 1. Summary The revised energy statement now shows that the development achieves a reduction of 122% carbon dioxide emissions on site, with 16% reduction under Be Lean scenario. However, the Carbon Management cannot currently support this application. The development does not currently meet: • London Plan Policy SI4 and Local Plan DM21: the development does not fully minimise adverse impacts on the urban heat island through design, layout, orientation, and materials. The proposal instead adds on the urban heat island effect through the use of active cooling without sufficient justification and without fully following the cooling hierarchy. Further information needs to be provided to address this objection in regards to energy and overheating strategy. This should be addressed prior to the determination of the application. 2. Energy Strategy The overall predicted reduction in CO2 emissions remains the same as previously reported. The Be Lean savings have been amended, now showing a reduction of 16% against Part L 2021. Non-residential (SAP10.2 emission factors) <table><tr><td colspan="4">Total regulated emissions</td></tr><tr><td>(Tonnes CO2 / year)</td><td colspan="3">CO2 savings</td></tr><tr><td>(Tonnes CO2 / year)</td><td colspan="3">Percentage savings</td></tr><tr><td>(%)</td><td colspan="3"></td></tr><tr><td>Part L 2021 baseline</td><td>0.8</td><td colspan="2"></td></tr><tr><td>Be Lean</td><td>0.6</td><td>0.1</td><td>16%</td></tr><tr><td>Be Clean</td><td>0.6</td><td>0.0</td><td>0%</td></tr><tr><td>Be Green</td><td>-0.2</td><td>0.9</td><td>106%</td></tr></table>	Total regulated emissions				(Tonnes CO2 / year)	CO2 savings			(Tonnes CO2 / year)	Percentage savings			(%)				Part L 2021 baseline	0.8			Be Lean	0.6	0.1	16%	Be Clean	0.6	0.0	0%	Be Green	-0.2	0.9	106%	
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Be Green	-0.2	0.9	106%																															

Stakeholder	Question/Comment	Response
	Cumulative savings 1.0 122% Carbon shortfall to offset (tCO2) No shortfall Energy Use Intensity / Space Heating Demand The Energy Use Intensity and the space heating demand is within the GLA benchmark. As per the applicant's email response date 8 April 2024, the warehouse is unheated and forms a significant proportion of floor area, this results in low space heating demand. Building type EUI (kWh/m2/year) Space Heating Demand (kWh/m2/year) Methodology used Non- residential 40.79 2.58 Part L2 – SBEM Actions: - Please model all parts of the industrial floorspace as heated. - Please provide the revised BRUKL sheets, and GLA carbon emission reporting spreadsheet. Energy – Lean The revised energy statement now proposed a saving of 0.1 tCO2 in carbon emissions (16%) through improved energy efficiency standards in key elements of the build, based on SAP10.2 carbon factors. The building fabric specifications remain the same as previously proposed. Actions: - Please specify the heating strategy and ventilation system assumed under the Baseline and Be Lean scenarios (including the gross efficiency figure(s)). For non-residential applications the baseline should align with the proposed heating system, i.e. for an air source heat pump, this should be specified with the efficiency values set out in Part L 2021 for that system under Be Lean. - If proposed, please identify on a plan where the MVHR units will be located within the buildings. The units should be less than 2m away from external walls. This detail can also be conditioned. Overheating is dealt with in more detail below. Energy – Clean No further comments. Energy – Green	

Stakeholder	Question/Comment	Response
	The proposed location of the 21kWp Solar PV system is as follows: Actions: - How much of the roof area will be covered approximately, what is the assumed efficiency, angle, and orientation of the panels? - How will the solar energy be used on site (before surplus is exported onto the grid)? - A living roof should be installed under the solar PV, or if this is not feasible, the roof should be light coloured to reduce solar heat gains and the improve efficiency of the solar panels. - Please identify on the plans where the air source heat pumps will be located and how the units will be mitigated in terms of visual and noise impact. Energy – Be Seen The applicant has provided the evidence of submission of the planning stage energy performance data to the GLA webform. It is recommended to comply with the additional reporting requirements at upcoming development stages. 3. Carbon Offset Contribution No carbon shortfall remains. 4. 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 London Heathrow weather files. The applicant has not properly followed the London Plan’s cooling hierarchy. The report has modelled office and warehouse spaces. The development is in high climate risk zone (ref: GLA climate risk map), with high risk of extreme land surface temperature, and high social vulnerability. Therefore, the London Weather Centre files should be used for modelling. Also, the use of air conditioning adds to the urban heat island effect which is not supported. It is required to properly following the London Plan’s cooling hierarchy and explore all the passive overheating mitigation measures to eliminate or reduce the cooling need. Any cooling proposed thereafter must be justified and supported by the most efficient option.	

Stakeholder	Question/Comment	Response
	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 2/2 DSY2 2020s 1/2 DSY3 2020s 0/2 DSY1 2050s DSY1 2080s The two warehouse units pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built: - Natural ventilation, with 100% openable windows and 50% openable doors. - Glazing g-value of 0.60, LT – 0.70 - Active Cooling Actions: - Redo the overheating modelling with the Central London weather file, which will more accurately represent the urban heat island effect. Please follow Haringey’s key overheating requirements (please follow this link to the summary document). - Demonstrate the development has followed the London Plan’s Cooling Hierarchy to design the development and to introduce mitigation measures, providing proper justification where measures have not been found feasible. - Specify the shading strategy, including technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, external shutters), elevations and sections showing where these measures are proposed. Internal blinds cannot be used to pass the weather files but can form part of the delivered strategy to reduce overheating risk for occupants (as long as it does not compromise any ventilation requirements). - Specify the ventilation strategy, including floorplans showing which habitable spaces will be predominantly naturally ventilated or mechanically ventilated, specification of the proposed mechanical ventilation (efficiency and air changes), window opening areas.	

Stakeholder	Question/Comment	Response
	- Include images indicating which sample spaces were modelled and floorplans showing the modelled internal layout of buildings. - Undertake further modelling: - o Model the 2020s DSY 2 and 3 and DSY1 for the 2050s and 20280s. Ensure the design has incorporated as many mitigation measures to pass these more extreme and future weather files as far as feasible. Any remaining overheating risk should inform the future retrofit plan. - o Any commercial/office areas, particularly where they will be occupied for a longer period of time. Assuming that active cooling will be provided is not sufficient. If the proposed uses are not yet clear, this aspect can be conditioned to ensure that the modelling is based on the potential future occupiers.; - Specify the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m2 and MY/year? Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point / any renewable sources. 5. Sustainability No sustainability statement is submitted. The sustainability section should set out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design. Action: - Set out what urban greening and biodiversity enhancement measures will be proposed (e.g. green infrastructure, bird boxes, bat boxes etc to connect to the green spaces around the site, living roofs, living walls, etc.) - How will the development increase staff uptake of active travelling (through cycle facilities). Demonstrate what safe, dry and accessible cycle parking is proposed. - A target (%) for responsible sourced, low-impact materials used during construction. - Set out how any demolition materials can be reused. - Set out how surface water runoff will be reduced, that it will be separated from wastewater and not discharged into the sewer. Non-Domestic BREEAM Requirement The applicant has also prepared a BREEAM Pre-Assessment Report for the development. Based on this report, a score of 61.4% is expected to be achieved, equivalent to 'Very Good' rating. It is recommended to aim for "Excellent" rating.	

Stakeholder	Question/Comment	Response
	Urban Greening / Biodiversity The development achieves an Urban Greening Factor of 0.00625. 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 on the land of the previous development and thus on a concrete hard standing (sealed surface) that is now used as a car park. Thus, the development would be exempted 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. However, it is recommended to explore biodiversity enhancement measures that would yield benefits for wellbeing of the users and measures such as tree plantation would improve the UGF and help with climate change adaptation. 8. Planning Conditions To be secured (with detailed wording TBC) Energy strategy - Overheating - BREEAM Certificate - Living roof(s) - Biodiversity 9. Planning Obligations Heads of Terms - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - If relevant, estimated carbon offset contribution (and associated obligations), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO₂ at the Energy Plan and Sustainability stages. <u>Carbon Management Response 15/08/2024</u> In preparing this consultation response, we have reviewed: • Energy Statement version 3 prepared by Achieve Green (dated 26 June 2024) • Thermal Comfort BREEAM Hea 04 prepared by Achieve Green (dated 22 May 2024) • Relevant supporting documents.	

Stakeholder	Question/Comment	Response								
	1. Summary The revised energy statement now shows that the development achieves a reduction of 135% carbon dioxide emissions on site, with efficient fabric, ASHP and 56kWp Solar PV system. However, the Carbon Management cannot currently support this application. The development does not currently meet: - London Plan Policy SI4 and Local Plan DM21: the development does not fully minimise adverse impacts on the urban heat island through design, layout, orientation, and materials. The proposal instead adds on the urban heat island effect through the use of active cooling without sufficient justification and without correctly following the cooling hierarchy. Further information needs to be provided to address this objection in regard to sustainability and overheating strategy. This should be addressed prior to the determination of the application. 2. Energy Strategy Energy Use Intensity / Space Heating Demand <table><tr><td>Building type</td><td>EUI (kWh/m2/year)</td><td>Space Heating Demand (kWh/m2/year)</td><td>Methodology used</td></tr><tr><td>Non- residential</td><td>69.72</td><td>14.91</td><td>Part L2 – SBEM</td></tr></table> Action: - The calculated Energy Use Intensity is higher than the GLA benchmark. Please explore measures to minimise this in line with the GLA benchmark, if not please provide justification. Energy – Green A 56kWp Solar PV system is now proposed which will cover 40% of the available roof space which will be positioned on the south facing roof side. This is highly supported. The proposed location of the 56kWp Solar PV system is as follows: 3. Carbon Offset Contribution No carbon shortfall remains. 4. Overheating	Building type	EUI (kWh/m2/year)	Space Heating Demand (kWh/m2/year)	Methodology used	Non- residential	69.72	14.91	Part L2 – SBEM	
Building type	EUI (kWh/m2/year)	Space Heating Demand (kWh/m2/year)	Methodology used							
Non- residential	69.72	14.91	Part L2 – SBEM							

Stakeholder	Question/Comment	Response
	The applicant has revised the dynamic thermal modelling assessment in line with CIBSE TM52 with London Weather Centre files. It is still not clear how the London Plan's cooling hierarchy is followed correctly. The applicant is proposing air conditioning which adds to the urban heat island effect and is not supported. It is currently unclear whether air condition has been modelled to pass the DSY1 2020s weather file. The report should model baseline scenario and introduce passive mitigation measures step by step in line with the cooling hierarchy. 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 2/2 DSY2 2020s 2/2 DSY3 2020s 2/2 DSY1 2050s DSY1 2080s The two warehouse units pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built: - Floor u-value - 0.10 W/m2K - External wall - 0.24 W/m2K - Pitched roof – 0.16 W/m2K - Flat roof – 0.15 W/m2K - Vehicle Access door – 1.3 W/m2K - Natural ventilation, with 100% openable windows and 50% openable doors. - Glazing g-value of 0.60, LT – 0.70 - Active Cooling Actions:	

Stakeholder	Question/Comment	Response
	- Demonstrate the development has followed the London Plan's Cooling Hierarchy to design the development and to introduce mitigation measures, providing proper justification where measures have not been found feasible. - Report results of the dynamic modelling in line with TM52 compliance criteria, clearly setting out the baseline scenario and additional modelled scenarios to test mitigation measures required to pass the overheating assessment. Mitigation measure should be in line with the London Plan Cooling Hierarchy. - o Baseline scenario - o Baseline + mitigation measure 1 - o Baseline + mitigation measures 1 + measure 2, etc - Specify the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m2 and MY/year? Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point / any renewable sources. 5. Sustainability No sustainability statement is submitted. The sustainability section should set out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design. Action: - How will the development increase staff uptake of active travelling (through cycle facilities). Demonstrate what safe, dry and accessible cycle parking is proposed. - A target (%) for responsible sourced, low-impact materials used during construction. - Set out how any demolition materials can be reused. - Set out how surface water runoff will be reduced, that it will be separated from wastewater and not discharged into the sewer. 6. Planning Conditions To be secured (with detailed wording TBC) - Energy strategy - Overheating - BREEAM Certificate - Living roof(s) - Biodiversity	

Stakeholder	Question/Comment	Response
	7. Planning Obligations Heads of Terms - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - If relevant, estimated carbon offset contribution (and associated obligations), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages. Carbon Management Response 28/10/24 In preparing this consultation response, we have reviewed: • Thermal Comfort BREEAM Hea 04 prepared by Archieve Green (dated 15 Oct 2024) • Relevant supporting documents. 1. Summary The revised overheating statement now includes both modelling with and without active cooling to passive mitigation measures have been maximised to reduce the risks of overheating before introducing any mechanical form of cooling. Appropriate conditions have been recommended to secure the benefit of this scheme. 2. Overheating The revised overheating modelling has modelled two officers without active cooling and one office with active cooling which is fully enclosed. The future weather files have also been modelled and the 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 2/2 DSY2 2020s 2/2 DSY3 2020s 2/2 DSY1 2050s 2/2	

Stakeholder	Question/Comment	Response
	DSY1 2080s 1/2 The two warehouse units pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built: - Floor u-value - 0.10 W/m2K - External wall - 0.24 W/m2K - Pitched roof – 0.16 W/m2K - Flat roof – 0.15 W/m2K - Vehicle Access door – 1.3 W/m2K - Natural ventilation, with 100% openable windows and 50% openable doors. - Glazing u-value of 1.40 W/m2K and g-value of 0.40, LT – 0.60 - Mechanical Extract ventilation of 1l/s/m2 - Active Cooling 3. Planning Conditions To be secured: Energy strategy The development hereby approved shall be constructed in accordance with the Energy Statement version 3 prepared by Archieve Green (dated 26 June 2024) delivering a minimum 135% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, air source heat pumps (ASHP) and a minimum 56 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 fabric efficiencies will meet the proposed targets: • Floor u-value - 0.10 W/m2K • External wall - 0.24 W/m2K • Pitched roof – 0.16 W/m2K • Flat roof – 0.15 W/m2K • Vehicle Access door – 1.3 W/m2K • Windows - 1.40 W/m2K • g-value of 0.40, LT – 0.60	

Stakeholder	Question/Comment	Response
	• Air permeability rate of 3 m3/hm2 @50Pa - Detailed BRUKL calculations for the non-residential element of the development, demonstrating how it will exceed the 15% improvement on Building Regulations under Be Lean; - Details to reduce thermal bridging; - 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; - 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; - 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 relevant block. Six months following the first occupation of that block, 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 Prior to occupation of the development, details of external/internal blinds to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism,	

Stakeholder	Question/Comment	Response
	specification of the blinds, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development or replace the blinds with equivalent or better shading coefficient specifications. The following overheating measures must be installed prior to occupation and be retained for the lifetime of the development to reduce the risk of overheating in habitable rooms in line with the Thermal Comfort BREEAM Hea 04 prepared by Archieve Green (dated 15 Oct 2024) • Floor u-value - 0.10 W/m2K • External wall - 0.24 W/m2K • Pitched roof – 0.16 W/m2K • Flat roof – 0.15 W/m2K • Vehicle Access door – 1.3 W/m2K • Natural ventilation, with 100% openable windows and 50% openable doors. • Glazing u-value of 1.40 W/m2K and g-value of 0.40, LT – 0.60 • Mechanical Extract ventilation of 1l/s/m2 • Active Cooling If the design is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application. Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21. BREEAM Certificate a) Prior to commencement on site for the relevant non-residential unit, 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 “Very Good” outcome (or equivalent), aiming for “Excellent”. 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.	

Stakeholder	Question/Comment	Response
	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 “Very Good” outcome (or equivalent), aiming for “Excellent”, 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. 4. Planning Obligations Heads of Terms - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - If relevant, estimated carbon offset contribution (and associated obligations) of £0, plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages.	
Inclusive Economy	Thanks. Makes sense. From an inclusive economy perspective, it's encouraging that it's being retained as space for accommodating jobs. It appears that the application is to replace like for like the commercial units that were subject to fire damage.	Support noted. contribution via s106 obligation.

Stakeholder	Question/Comment	Response
	In light of this, I'm unsure on what grounds the Council could object to it without knowing wider planning policy. From an inclusive economy perspective, perhaps employment space intensification would be encouraged, in order words, seeking more employment space at the site through additional floors?	
Pollution	Thank you for contacting the Carbon Management Team (Pollution) regarding the above planning application for the erection of two replacement units designed to match the original units following fire damage and demolition of the original units at 27-31 Garman Road, London, N17 0UP and I would like to comment as follows. Having considered the applicant submitted information including; Design and Access Statement prepared by SAM Planning Services, dated December 2023; Energy Statement prepared by Achieve Green, dated 20th June 2023 and taken note of the proposal to install a 21 kWp photovoltaic system on the roof of the building; please be advised that we have no objection to the proposed development in relation to AQ and Land Contamination but the following planning conditions are recommend should planning permission be granted. 1. Land Contamination Before development commences other than for investigative work: a. A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. b. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority. c. If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements. d. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.	Support noted and 4,5 & 6 attached.

Stakeholder	Question/Comment	Response
	e. Where remediation of contamination on the site is required, completion of the remediation detailed in the 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 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. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site. b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion. Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ	

Stakeholder	Question/Comment	Response
	4. Construction Environmental Management Plans a. Development shall not commence 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 above: a) The CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP). b) The CEMP shall provide details of how construction works are to be undertaken respectively and shall include: i. A 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 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. c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on: i. Monitoring and joint working arrangements, where appropriate; ii. Site access and car parking arrangements; iii. Delivery booking systems; iv. Agreed routes to/from the Plot; v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and vi. Travel plans for staff/personnel involved in construction works to detail the measures to encourage sustainable travel to the Plot during the construction phase; and	

Stakeholder	Question/Comment	Response
	vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching. 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 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 must be sent to the Local Planning Authority prior to any 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.”	

Stakeholder	Question/Comment	Response
Cllr John 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 20 years as a Cllr for this ward and as the Design Champion for Haringey. I note the uniformity of the design and materials / mainly brick that add to the attractiveness of this industrial estate. I would request that this uniformity is not negatively affected by any changes to the proposals / designs / pictures that have been submitted to me.	Support noted. Condition 3 attached.
EXTERNAL		
Thames Water	Thames Water has reviewed this H4 consultation. As we don't have confirmation of the exact drainage arrangements for this property, we will require further information from the applicant or agent. A build over agreement will be required if the work is within three metres of a public sewer or one metre of a lateral drain. This could be an approved build over agreement or, if the property owner meets all the criteria required in our online questionnaire, a self certified agreement. Your client can find out more and apply on our website . Please also advise your client, if applicable, that Thames Water do not permit driven piles within 15m of a public sewer. Our technical guidance can be found here . We would really appreciate your support on this matter in order to protect the local environment for all.	Concern addressed and attached condition 16.

Stakeholder	Question/Comment	Response
Greater London Archaeological Advisory Service	Thank you for your consultation of 27/11/2024 regarding the above application for Planning Permission. On the basis of the information provided, we do not consider that it is necessary for this application to be notified to Historic England's Greater London Archaeological Advisory Service under their consultation criteria, details of which are on our webpage at the following link: https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice If you consider that this application does fall within one of the relevant categories, or you have other reasons for seeking our advice, please contact us to discuss your request. If we do not hear from you within five working days we will assume this application should not have been sent to us. This response relates to undesignated archaeological assets only. If necessary, Historic England's Development Management or Historic Places teams should be consulted separately regarding statutory matters.	Noted.
Designing Out Crime Office (Met Police)	Our ref: NE 7826 Section 1 - Introduction: Thank you for allowing us to comment on the above planning proposal. 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). I can confirm we have not met with the project design team to review Safety, Security or Crime Prevention. We have concerns around some aspects of the design and layout of the development. 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. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early.	Supported and noted and attached condition 11 & 12.

Stakeholder	Question/Comment	Response
	Whilst in principle we have no objections to the site, 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. There has been no consultation with our department or subsequent mention of how the development intends to prevent crime when complete. There is no mention of crime prevention or Secured by Design in the Design and Access Statement referencing design out crime. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to. Please provide my details to the applicant so we can discuss and address our concerns. Section 2 - Secured by Design Conditions and Informative: Should planning consent be granted for this application, we would request the following conditions and informative. Conditions: A. Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained. Accreditation must be achieved according to current and relevant Secured by Design guidelines at the time of above grade works of each building or phase of said 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. B. The commercial aspects of the development must achieve the relevant Secured by Design certification at the final fitting stage, prior to the commencement of business and details shall be submitted to and approved, in writing, by the Local Planning Authority. 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. Section 3 - Conclusion:	

Stakeholder	Question/Comment	Response
	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 the recommendations/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. 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. Site specific advice may change depending on further information or site limitations as the project develops: To be utilised in further discussions with the appointed developer at a later stage. Boundary Treatment Ideally side and rear boundary onto the public realm should be 2.4m (potentially 1.8m with 600mm trellis or 2.1m with a 300mm trellis). Any vertical transom (support) should be inward facing Metal fabrication, should be robust, have an unfinished top rail (exposed tops), to deter loitering, sitting and climbing. We recommend 358 gauge weld mesh fence panels If fencing is constructed of wood material, ensure panels are vertical with no support beams allowing climbing opportunities. Panels to be mechanically secured in place to prevent lift removal	

Stakeholder	Question/Comment	Response
	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. Any perimeter boundary treatment (railings) should be between 1. 8m - ideally designed to provide visual permeability Gates to be 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 Where possible building lines should be flush to allow natural surveillance, any recesses should not exceed 600mm If anti-climbing measures are introduced then signage should be used to comply with occupier's liability Act 1984 Any boundary treatments should be UKAS certified as recommended by a DOCO All low defensive wall/railings to be designed to deter sitting, loitering and climbing. Access Control Key fob access control with a data logging system is recommended as this is more efficient to deactivate/replace lost/stolen keys. It can also assist with identifying any misuse Data to be stored for one calendar month before being over written Access control panels to have audio/visual capability. Primary camera on panel to capture all visitors No Trade Button on control panel Emergency Exit (push to release) primary egress routes that are required to have an emergency escape mechanism should be self-resetting, shrouded and in best practice be alarmed Plant/Service room door set/s accessible by public realm are required to be one of the following UKAS certified products: - o LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or - o STS202 Issue 3:2011 BR 2+ or - o LPS2081 SR2 B+ or Equivalent certification Consideration required regarding the security/risk management to Internet Of Things (IOT) Note: Service/plant door/s should be self-closing, self-locking single doors. ACB (Access Control Box) / Fire Access An external fire over ride switch (FOS) should be protected with the use of an accredited security product such as a Gerda Box. Consideration to other suppliers of	

Stakeholder	Question/Comment	Response
	this type of fire switch protection method should be given, check SbD web site. In addition to the use of an ACB see below re Premises Information Box (PIB). https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/accesscontrol-box-(acb).aspx Premises information box (PIB) typically used to store site specific documentation such as communal access routes, fire risers etc. PIB is generally located behind the primary security layer and is intended for LFB use only (Refer to current Homes guidance) 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-lockingsystem/drop-key-protection-box-(dpb).aspx. Doors o Communal door set/s should be flush with the building line to prevent any recesses and should be certified to: o LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or o STS202 Issue 3:2011 BR 2+ or o LPS2081 SRB or Equivalent certification o We recommend that customer entrances have a secure lobby area to provide adequate security for staff and customers. The secondary lobby door set/s that are required to be dual certified to the following minimum standards: o LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or o STS202 Issue 3:2011 BR 2+ or o LPS2081 SRB or Equivalent certification Fabricator 3rd party UKAS certification Note: Communal door/s should be self-closing, self-locking single doors Windows All easily accessible windows (anything under 2m from another surface treatment) should be certificated to either: o PAS24:2022 with BS EN356:2000 min.P4A glazing o STS204 Issue 6:2016, o STS202 Issue 7:2016 Burglary Rating 1 o LPS1175 Issue 7.2:2014 Security Rating 1 or o LPS1175 Issue 8:2018 A1 Security Rating 1 or o LPS 2081 Issue 1.1:2016 Security Rating A. Accessible windows includes any glass reached by climbing any number of floors via rain water	

Stakeholder	Question/Comment	Response
	pipes, balconies or via communal walkways (whether walkway accessed through secure door or not) 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 Where curtain walling systems are proposed these should be certificated to either: - o LPS1175 SR2 - o BS EN1627 RC3. (With minimum of BS EN356:2000 P4A Glazing) - o PAS24:2022 Note: Curtain wall systems are non-structural cladding systems for the external walls of buildings. Typically curtain wall systems comprise a lightweight aluminium frame onto which glazed or opaque infill panels can be fixed. These infill panels are often described as 'glazing' whether or not they are made of glass. Vehicle gates Vehicle gates should be UKAS accredited to LPS 1175 B3 or LPS 2081 SRB or equivalent, with video and audio access control. Refuse Storage Ideally should not allow access into the building from the refuse store Street access doors to be single leaf and either - o LPS1175 SR2 or - o STS202 BR2/B3 Doors to be single leaf, self-closing and self-locking with access control, ideally using magnetic locks to the previous documented standard. (2 x 500kg resistance (1200lbs/psi) positioned 1/3 from the top and 1/3 from bottom) If louvre doors are used, these should be of robust construction (ideally steel) supported with a layer of steel mesh to the rear to prevent unauthorised access to the locking mechanism and prevent general misuse A suitable level of lighting to be present within store, ideally low level at times of inactivity and full level illumination when in use. To compliment any CCTV. External lighting to be Dusk to Dawn covering door set No external signage identifying the refuse store CCTV should cover the refuse store and avoid positions that would restrict coverage. Note: Single leaf doors are available up to approx. 1500mm to and will facilitate 1100cc bins in LPS and STS. This will eliminate the weakness of the passive leaf manually operated	

Stakeholder	Question/Comment	Response
	locking system which leaves double doors more vulnerable. Cycle storage Internal access doors to be ether: - o LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or - o STS202 Issue 3:2011 BR 2+ or - o LPS2081 SRB or Equivalent certification Must be single leaf, self-closing and self-locking with access control ideally using magnetic locks 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 No external signage CCTV must be installed in cycle stores. Should have unhindered views of the racking at all times and should be vandal resistant There should be 3 locking points for cycles on the racks/stands provided. Cycle racking should be secured with anti-tamper fixings 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 should ideally be placed inside the store to reinforce importance of securing cycles If timber storage/sheds are to be used, then these must be of robust construction and designed to the SbD guidance (Sec 56). Requires at least 2 points of locking on the main door. If items of value are to be stored within the shed then a security anchor should be certificated to 'Sold Secure' Silver Standard LPS 1175 Issue 7.2:2014 Security Rating 1 or LPS 1175 Issue 8:2018 Security Rating A1. Alarm System The proposed site should benefit from an alarm system to meet BS EN 50131 (as minimum) which can include wireless systems. CCTV The development should be supported with HD CCTV in all areas that the public have access to and any valuable equipment such as entrances, lobby areas, post box, refuse store, cycle stores parking areas and stair cores. The footage must be of evidential values and stored for a minimum of 31 days. All footage to be time and date stamped and recorded in a format that is accessible to the local authority	

Stakeholder	Question/Comment	Response
	and police. CCTV systems should conform to BS EN 62676: 2014 - video surveillance systems. Postal Strategy Mailboxes should be covered by CCTV and meet TS009 standards or MPS robust mailbox specification below: A minimum of 1.5mm thick galvanized steel construction. Its depth and width must allow mail to fall below the fishing plate unrestricted Fitted with a 3-point locking mechanism supported with a minimum five pin cam lock BS EN 1303:2005 (Inc corrigendum Aug 2009) compliant five/six pin camlock must have anti-drill, anti-bump and anti-pick lock attributes Gap restricting aperture (anti-fishing max 260mmx40mm) The anti-fishing plate must be fabricated as part of the post box construction and extend into and across the full length of the letterbox opening to defend against the interference of mail, anti-leverage surrounding trim, welded claw on retrieval door to negate the ability to gain a leverage point and compromise the security of the mailbox Unit to have a minimum of 13Ltrs storage. 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. https://theilp.org.uk/ 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 nonactivity, higher level once movement is detected) 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: - o Office interior (security) 05 Lux - o Private car parks 10 Lux - o Exterior Rural location 10 Lux - o Exterior Urban location 20 Lux - o Walkways 30 Lux - o Loading bays 50 Lux	

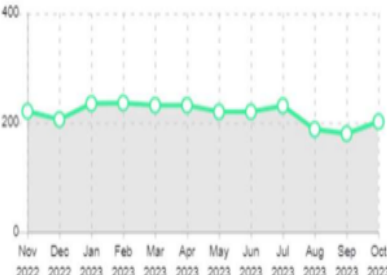
Stakeholder	Question/Comment	Response
	Further guidance is available in the “Lighting against crime” manual The even distribution of light across the area being illuminated. A good lighting system is one designed to distribute an appropriate amount of light evenly with uniformity and should include the following: - o Values of between 0.25 and 0.40 - o Using lamps with a rating of at least 60 (minimum) on the Colour Rendering Index. - o Good lighting will use energy efficient lamps in suitable luminaries Dusk-Till-Dawn 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 Bollard lighting shall be avoided due to its history of vandalism and ease of covering. 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 Climbing Aids It is recommended that any climbing aids such as balconies, canopies, protruding brickwork/cladding etc., should not be positioned near any windows/doors and fixed flush with the building/boundary. This will mitigate against burglaries and domestic violence perpetrators. Canopies above entrances should be avoided to deter rough sleepers or the concealment of any perpetrators from misusing this area. If canopies are used then the depth must be below 600mm and they must be non-load bearing. If any canopy is robust enough to withstand a person standing on top, all nearby windows will be classed as vulnerable and therefore will be required to be PAS24 P2A. Any drain/rain pipes should ideally be internally installed. External drain/rain pipes should be of square design and sit flush against the building to prevent them being used as a climbing aid. They should be located away from any windows or balconies. Roof Access AOV's should not be restricted from working, however can be reinforced potentially with fixed grille or railing (LPS 1175 SR1) to prevent unauthorised access Easily accessible roof lights should be a one of the following standards: - o PAS24:2016 or - o STS 204 (issue 6: 2016) or - o LPS1175 (issue 7: 2014) SR1 or	

Stakeholder	Question/Comment	Response
	- o LPS1175 (issue 8: 2018) SR1 / A1 or - o STS202 (issue 7: 2016) BR1 or - o LPS2081 (issue 1.1: 2016) SR A If roof door access is required for “maintenance only” the door should be PAS24:2016 as a minimum. This door should be secured ideally with a key. However, access control can be used in conjunction with a recommended locking mechanism and must be restricted to maintenance staff only. CCTV / Alarm Any alarm installed should meet BS EN 50131 (as minimum) CCTV should complement other security measures, not replace them. As a minimum police recommend coverage of the following areas: - o Entrance & exit points including secondary coverage of call points - o Foyer / Lobby areas - o Post boxes and Postal rooms - o Cycle stores - o Refuse stores - o Top of stair cores Image quality should be able to provide facial recognition and colour HD quality during daylight and night time CCTV housing to be anti-vandal and potentially shrouded. Signage highlighting use of CCTV should displayed throughout the development 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. Note - There are further concerns that need to be discussed with the applicant regarding the following and the implication to their design which may affect the outcome of SBD accreditation. Early consultation will address these concerns Access control strategy – how staff and the visitor moves throughout the building Door security – which layers are required to ensure the safety and security of users and how this effects the fire strategy Building use – Is the building to be solely occupied by a single or several companies etc.	

Stakeholder	Question/Comment	Response
	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	

Stakeholder	Question/Comment	Response
	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'" 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 reduce levels of crime, fear of crime and anti-social 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 policies 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.	

Stakeholder	Question/Comment	Response
	The Supplementary Planning Documents ‘Designing Safer Places’ and ‘Landscaping’ provide further additional guidance supporting the recommendations. Section 17 of the Crime and Disorder Act 1988 states “It shall be the duty of each Authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on and the need to do all it reasonably can to prevent Crime and Disorder in its area”, as clarified by PINS953. The National Planning Policy Framework (NPPF) “Planning policies and decisions should aim to ensure that developments create: Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.” 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: South Tottenham ward	

Stakeholder	Question/Comment	Response																																		
	South Tottenham ward Top reported crimes Most commonly reported crimes during Oct 2023 <table><tbody><tr><td>Violence and sexual offences</td><td>58</td></tr><tr><td>Anti-social behaviour</td><td>48</td></tr><tr><td>Vehicle crime</td><td>29</td></tr><tr><td>Other theft</td><td>18</td></tr></tbody></table> Get crime prevention advice Crime levels overview Crime for last year Crime per Month <table><thead><tr><th>Month</th><th>Crime</th></tr></thead><tbody><tr><td>Nov 2022</td><td>220</td></tr><tr><td>Dec 2022</td><td>200</td></tr><tr><td>Jan 2023</td><td>230</td></tr><tr><td>Feb 2023</td><td>230</td></tr><tr><td>Mar 2023</td><td>220</td></tr><tr><td>Apr 2023</td><td>220</td></tr><tr><td>May 2023</td><td>210</td></tr><tr><td>Jun 2023</td><td>210</td></tr><tr><td>Jul 2023</td><td>230</td></tr><tr><td>Aug 2023</td><td>180</td></tr><tr><td>Sep 2023</td><td>170</td></tr><tr><td>Oct 2023</td><td>200</td></tr></tbody></table> View as a list	Violence and sexual offences	58	Anti-social behaviour	48	Vehicle crime	29	Other theft	18	Month	Crime	Nov 2022	220	Dec 2022	200	Jan 2023	230	Feb 2023	230	Mar 2023	220	Apr 2023	220	May 2023	210	Jun 2023	210	Jul 2023	230	Aug 2023	180	Sep 2023	170	Oct 2023	200	
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Stakeholder	Question/Comment	Response
	202 crimes were reported here in October 2023 Violence and sexual offences 58 Anti-social behaviour 48 Vehicle crime 29 All other crime 67 View crime definitions Download area crime data 180 crimes were reported here in September 2023 Anti-social behaviour 46 Violence and sexual offences 41 Vehicle crime 29 All other crime 64 View crime definitions Download area crime data The most commonly reported crimes on this ward during October 2023 are: Violence, Anti-Social behaviour, Vehicle crime and Theft. The crime levels over the last few months have remained at a similar levels but appear to be rising. These crime types are also the most commonly reported crimes over the last 12 months.	

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Stakeholder	Question/Comment	Response
	Police.Uk provides open source crime data, please see the Home Office crime classifications below as depicted on the Police.uk web site keeping in mind that not all crime takes place in the public realm. All crime: Total for all categories. Anti-social behaviour: Includes personal, environmental and nuisance anti-social behaviour. Bicycle theft: Includes the taking without consent or theft of a pedal cycle. Burglary: Includes offences where a person enters a house or other building with the intention of stealing. Criminal damage and arson: Includes damage to buildings and vehicles and deliberate damage by fire. Drugs: Includes offences related to possession, supply and production. Other crime: Includes forgery, perjury and other miscellaneous crime. Other theft: Includes theft by an employee, blackmail and making off without payment. Possession of weapons: Includes possession of a weapon, such as a firearm or knife. Public order: Includes offences which cause fear, alarm or distress. Robbery: Includes offences where a person uses force or threat of force to steal. Shoplifting: Includes theft from shops or stalls. Theft from the person: Includes crimes that involve theft directly from the victim (including handbag, wallet, cash, mobile phones) but without the use or threat of physical force. Vehicle crime: Includes theft from or of a vehicle or interference with a vehicle. Violence and sexual offences: Includes offences against the person such as common assaults, Grievous Bodily Harm and sexual offences. 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. We strongly advise that independent third party certification is obtained from a manufacturer to ensure the fire performance of any of their door sets in relation to your needs and to ensure compliance with both current Building Regulations and the advice issued by the Department for Communities and Local Government on 22nd June 2017 following the Grenfell Tower Fire.	

