

BERNARD WORKS - INTERNAL AND EXTERNAL CONSULTEES

INTERNAL CONSULTEE	COMMENT	OFFICER RESPONSE
LBH Waste Management	<p>Further to your request concerning the above planning application I have the following comments to make:</p> <ul style="list-style-type: none"> - Wheelie bins or bulk waste containers must be provided for household collections. - Bulk waste containers must be located no further than 10 metres from the point of collection. - Route from waste storage points to collection point must be as straight as possible with no kerbs or steps. Gradients should be no greater than 1:20 and surfaces should be smooth and sound, concrete rather than flexible. Dropped kerbs should be installed as necessary. - If waste containers are housed, housings must be big enough to fit as many containers as are necessary to facilitate once per week collection and be high enough for lids to be open and closed where lidded containers are installed. Internal housing layouts must allow all containers to be accessed by users. Applicants can seek further advice about housings from Waste Management if required. - Waste container housings may need to be lit so as to be safe for residents and collectors to use and service during darkness hours. - All doors and pathways need to be 200mm wider than any bins that are required to pass through or over them. - If access through security gates/doors is required for household waste collection, codes, keys, transponders or any other type of access equipment must be provided to the council. No charges will be accepted by the council for equipment required to gain access. - Waste collection vehicles require height clearance of at least 4.75 metres. Roads required for access by waste collection vehicles must be constructed to withstand load bearing of up to 26 tonnes. - Adequate waste storage arrangements must be made so that waste does not need to be placed on the public highway other than immediately before it is due to be collected. Further detailed advice can be given on this where required. <p>Other comments as follows:</p> <p>This proposed application will require adequate provision for refuse and recycling off street at the front of the property. I would like to confirm that space must be provided for this</p>	<p>Comments Noted. Waste issues are addressed in Section 6 of the report.</p>

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	<p>property. The information indicated above and below provides some detail about accessibility, design and space requirements.</p> <p>Guidance for this application has been highlighted above and below.</p> <ul style="list-style-type: none"> • 17 x 1100L bin for refuse • 10 x 1100L bin for recycling • 99 x food waste kitchen caddy • 7 x 140L food waste exterior box <p>Arrangements will need to be made to ensure waste is contained at all times.</p> <p>Waste collection vehicles would be expected to enter and exit the development using forward motions.</p> <p>A management plan may need to be in place to ensure that waste receptacles are within the 10m guidance on day of collection.</p> <p>Provision will need to be made for storage of receptacles within the property boundary not on the public highway.</p> <p>Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</p> <p>The above planning application has been given a RAG traffic light status of GREEN for waste storage and collection</p>	
LBH Tottenham Regeneration Team	The Tottenham Area Action Plan (AAP) sets out an ambitious vision for economic and employment growth in Tottenham Hale. In order to achieve this, it is imperative that local employment land is fully maximized and that sites are appropriately positioned to support the existing and emerging business sectors.	Comment Noted.

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	<p>The Tottenham Area Action Plan (AAP) has a number of site designations which are designed to see the area thrive and intensify as a location for businesses and jobs. The proposed development site is designated in the Tottenham AAP under development site TH12, 'Herbert Road'. Aligning with the status of the wider Designated Employment Area, the key aim for the TH12 site is to maximise and rationalise employment generating uses. The site also permits residential use in order to cross-subsidise the development of new employment provision.</p> <p>The proposed development will see a workspace-led, mixed use scheme come forward, providing much needed affordable workspace for local entrepreneurs, start-ups and creative industries.</p>	
<p>LBH Principal Conservation Officer</p>	<p>The development would not have an impact on the Page Green/Seven Sisters Conservation area or the listed Old Bank or Markfield Beam Engine. The proposal is of high quality and has been sensitively designed to transition between the terraced streetscape and taller elements. The proposal, in my opinion, would enhance the townscape of this part of Tottenham and would enhance the setting of the heritage assets within the wider area.</p>	<p>Comment Noted.</p>
<p>LBH Principal Transportation Officer</p>	<p>1.0 Public Transport Accessibility Level</p> <p>The development site is highly accessible with a score of Public Transport Accessibility Level (PTAL) 6A, however there is a section which falls within PTAL 3. PTAL ranges from 1 (described as 'very poor') to 6B (described as 'excellent'). Bus routes included in the PTAL calculations are: 349;259;279;243;318;476;149;76;41;W4, including London underground Seven Sisters and two rail stations Seven Sisters and South Tottenham;</p> <p>2.0 Changes to the public highway</p> <p>There are some major changes proposed to public highways to enable this development. Proposed changes are: fusing of the Ashby Road and Herbert Road where they run in parallel, and Norman Road to connect with Bernard works to improve connections for commercial vehicles.</p> <p>As existing, Herbert Road which follows to Bernard Road in a semicircle and encloses three sides of this development is currently open to all traffic movements. Norman Road which is located mid-way to the west of development site is currently a no through road for vehicle movements.</p>	<p>Comments noted. Transportation issues are addressed in the Transport and Highways section of the report.</p>

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	<p>Part of Bernard road runs parallel to Ashby Road, with an existing 2 m high wall separating the two public roads. Access from Ashby Road to Herbert Road was closed off in the past, thus creating no through road. Turnings of the refuse/recycling vehicles were assumed to be done using the existing turning head.</p> <p>Three options were considered and presented to the consultees. These were: Option A, included utilizing of the parallel roads and road closure between Herbert Road and Ashby Road, but allowing access to emergency and refuse/recycling vehicles. This option would retain the cul-de sac, for most of the time. However, under this option Herbert Road would become a dead end road and turning circle is required.</p> <p>Option B, proposed the closure to be at corner of Page Green Road and Ashby Road. One of the advantages of this option was the direct access created from Ashby Road to Broad Lane.</p> <p>Option C, proposed creating the homezone. This option would retain benefits of the other options, while keeping all traffic movements.</p> <p>Having considered the feedback from residents, it was decided to proceed to develop detailed design of Option A.</p> <p>The drawing with ref: 00118 contained within the Transport Assessment, shows indicative stopping-up areas, areas to be offered for adoption, and works on retained public highways.</p> <p>The applicant to follow appropriate sections of the Highways Act and processes for the necessary works.</p> <p>Using the submitted drawing, the area highlighted in red to be stopped-up, following the process of stopping up and diversion of highways under Section 247 and 248 of the Town and Country Planning Act 1990. This may be subject to change after considering the ownership implications. The area stopped up will then be used to construct this development and the other part is proposed to become Bernard Road shared surface area.</p> <ul style="list-style-type: none">• The shared areas that have been created to be maintained by the applicant for the foreseeable future. <p>The drawing with ref: 00113 rev P1, shows bollards in two places, which aim to stop traffic movements from Page Green Road to Bernard Road.</p>	
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	<ul style="list-style-type: none">• Further details to be agreed with HA <p>Flag 1: (still undecided on how it will be maintained/ and who owns it after is stopped-up and understand why bollards are needed ? and proposed as best solution to create restrictions).</p> <p>Works on the existing public highway, areas highlighted in brown on the drawing ref: 00118, to be done through Highways Act 1980 under S 278-(agreements as to execution of works on the public highway). The extent of works to be agreed as part of the process.</p> <ul style="list-style-type: none">• The applicant is required to follow S278 process, submit a safety audit report including details and specifications of all public areas proposed to be modified. <p>Particular attention to be given to the following matters:</p> <ul style="list-style-type: none">-all proposed parking spaces to have Active Electric Vehicle Charging Points-(type to be agreed).-swept paths for corner parking spaces on Ashby Road are required to ensure that vehicles can maneuver without hindering the shared new turning head at the top of the new Ashby Road. <p>Thereafter works must be implemented in accordance with this agreement and prior to occupation of this development.</p> <p>The drawing with ref: 00113 rev P1, has two areas highlighted in green which are proposed to be offered for adoption to the HA. They must be constructed to adoptable standards and the applicant to follow the process of S38 (power of highway authorities to adopt by agreement)</p> <p>Flag 2 To check if top area in green needs to be stopped up first. ownership??? Maybe using the S118 Stopping up of footpaths and bridleways.</p> <h3>3.0 Car Parking</h3> <p>Policy 6.13, of the London Plan sets out the car parking standards and strategic direction to facilitate new developments with appropriate levels of parking. It indicates that, maximum car parking standards for residential developments in the outer London with a high PTAL, is up to 1 space per unit. LBH is identified in map 2.2, of the London Plan, as part of the outer London.</p>	
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	<p>Parking addendum to Chapter 6, has recommendations for blue badge holders indicating that: for residential developments, requirement is a provision for at least one accessible on or off-street parking space. It is also stated that when off-street parking is provided then at least two parking spaces should be for blue badge holders.</p> <p>In addition, Policy 6A.1, of the addendum includes parking standards for blue badge holders for non-residential uses, indicating that, at least one on or off street car parking should be provided, and designated for blue badge holders, even if no other parking is provided.</p> <p>With regards to employment land uses the addendum necessitates parking provision for each disabled employee, and provision for disabled visitors.</p> <p>Policy 2.8 of the outer London Transport outlines strategic direction and recognises car parking requirements for outer London areas to be higher in comparison with central areas, although a flexible approach is encouraged in applying standards of the Policy 6.13 and Table 6.2.</p> <p>Policy 3.8 of the London Plan recommends are that 10% of new housing should be, either designed to be wheelchair accessible from the start, or easily adaptable for residents who are wheelchair users. Policy DM32 on parking standards, part of the LBH Development Management DPD- January 2016, indicates that London Plan policies are valid when planning proposals are assessed.</p> <p>When applying policy 3.8, this development should include 11 residential units which are Wheelchair User Dwellings (WUD) at the point of construction, or easily adaptable afters.</p> <p>The Housing Supplementary Planning Guidance (March 2016)-London Plan 2016 Implementation Framework, set up standards indicating that each designated wheelchair accessible unit, should have a car parking space. If all of the assigned WUD are in use as wheelchair accessible units, and each have access to a car parking space at the same time, then parking provision for this proposal should be 11 spaces.</p> <p>A total of 18 car parking spaces are included in this proposal, 3 of which are relocated on-street standard parking from Ashby Road to Herbert Road.</p> <p>13 residential car parking spaces are included (10 parking bays for blue badge users are provided along Ashby Road, whereas the other 3 standard bays are proposed along the Herbert Road). All residential</p>	
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	<p>parking spaces created on this proposal will be part of the CPZ and would be utilized by other blue badge holders residing or visiting this area.</p> <p>5 commercial parking bays are proposed (3 standard bays,2 for blue badge users).</p> <p>Proposed development can be argued that is car free because all residents (other than blue badge holders), are not entitled to purchase on-street parking permits. The applicant has agreed to this approach and securing it through S106.</p> <ul style="list-style-type: none">• S106: 'car free development'- secured through s106. <p>Having considered all of the above policies, it was concluded that, residential car parking provision is acceptable, if the following is attained and secured through S106.</p> <p>The outstanding matters to be covered through,</p> <p>Condition: Car Parking Management Strategy (CPMS) containing all parking matters, such as:</p> <ol style="list-style-type: none">1. All parking spaces must be made available before the occupation, and retained thereafter.2. visibility splays3. submit details on facilitating/managing disabled parking for the commercial part of this development4. submit details on controlling the servicing/ delivery area, parking enforcement,5. swept paths for delivery vans, ramp details (if any proposed), <p>4.0 Cycle parking</p> <p>There are 183 cycle parking spaces included in this development. For the residential part this consists of: 158 (long stay) and 3(short stay), whereas for B1 commercial and sui generis uses included in this proposal, 17 (long stay) and 5(short stay) cycle parking spaces.</p> <p>The London Plan standards for minimum cycle parking for residential are: C3-C4 dwellings (all); long stay_ 1 space per studio and 1 bedroom unit; 2 spaces per all other dwellings and Short stay 1 space per</p>	
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	<p>40 units</p> <p>When applying these requirements the minimum cycle parking for this development is a provision of 158 long stay cycle parking spaces and 3 short stay cycle parking spaces.</p> <p>Requirement for A3 café is based on the proposed floorspace is one space per 175 sqm. (starts from 100sqm). Having considered that proposed café is 85.8 sqm , it does not reach the threshold to provide cycle parking.</p> <p>There are 25 Commercial Units (B1/B2) included in this proposal as well as other sui generis planinig land uses. The requirement for minimum cycle parking for B1/B2 (including sui generis) are: 17 long stay and 5 short stay spaces.</p> <p>Location of the cycle parking spaces were included in the TA drawing with reference: 00113 rev P1. For residential part of this development, (cores 1-3 have cycle parking located at ground level, core 4 has spaces located at basement level and accessed through a lift, core 5 has both cycle parking at ground and basement level.) whereas for the commercial uses parking spaces are accessed directly from the courtyard, with shower facilities provided within the pavilion service.</p> <p>Although cycle parking areas are shown and number of spaces have been indicated, other details are missing.</p> <p>Outstanding matters regarding the Cycle parking to be covered by a Condition.</p> <p>Condition: further details to be submitted, each cycle parking space to be shown on the drawing, parking spaces must be of suitable quality, information request on maintenance arrangements of areas and cycle parking spaces, secured access for residents, visitors and staff is required. Cycle parking should be available from the first occupation, with all spaces retained thereafter.</p> <p>5.0 Parking restrictions on the public highways</p> <p>The development site is within the Seven Sisters (7S), Controlled Parking Zone (CPZ) restricting on-street parking, Monday to Saturday, from 8am to 6.30pm. There are some nearby road which are not within the CPZ, which could be effected when this proposal is occupied.</p>	
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	<p>In order to monitor potential parking displacement following the occupation of proposed development, S106 contributions are sought. Contributions will be used to assess and analyse parking stress in the vicinity. First, to establish base data which is parking stress prior to occupation. Then, monitoring to continue when level of occupation is at 50% and over 75%.</p> <p>If findings suggest an increase in parking stress, affecting areas which are not within the CPZ, or existing timings of parking restrictions are not appropriate, then changes to the CPZ would be proposed by the local HA, which are subject to public consultations and its outcome cannot be predicted. Nevertheless, S106 contribution are required to enable to proceed and mitigate possible impact.</p> <ul style="list-style-type: none">• S106 contributions_ parking stress review, including all costs associated with revision of the CPZ. <p>6.0 Travel Plan</p> <p>A Travel Plan (TP) for residential and commercial land uses of this proposal is required, to be drafted in consideration with the latest TfL's guidance. The guidance can be found using this link: https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans</p> <p>The developer is responsible for creating a sustainable development and achieving the TP targets. The TPs must contain an action plan, which includes a range of measures which support the sustainable modes of transport, each with timescales for implementation.</p> <ul style="list-style-type: none">• Travel plans to be secured through S106, with heads of terms containing actions to promote the use of sustainable modes of transport. <p>For example: appointment of a travel plan coordinator, personalised travel plans for residents, initial contributions to residents to purchase bikes, provision of areas with equipment for cycle maintenance, contributions towards the first year membership of a car club or vouchers for residents to purchase bikes, etc. are some actions which could be included in the action plan.</p> <p>Furthermore, in order to monitor the submitted TP the developer must contribute towards monitoring fee. Thus,</p> <ul style="list-style-type: none">• S106 is sought to cover the local HA costs for reviewing the submitted Travel Plans, annual amount of £1,000 per travel plan, until such time when targets of the travel plans are met.	
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	<p>7.0 Refuse/recycling</p> <p>The TA contains a section on Waste Strategy. The storage requirements are shown on for the residential and the commercial. The commercial waste will be collected using the private provider.</p> <p>Swept path analysis were submitted on the drawings with ref: 00116 rev P1 however this shows that refuse vehicles entering the private area, which may not be possible. Further details are required.</p> <p>Condition: Further details to be submitted on agreeing the refuse collection areas.</p> <p>With regards to recycling there is a lack of information, hence</p> <p>Condition: Further details to be submitted on recycling (storage areas, collection point, agreeing with the service provider)</p> <p>8.0 Delivery/Serviceing</p> <p>Section D of the TA includes a delivery and servicing plan. It contains targets and responsibilities on reducing the deliveries associated with this development.</p> <p>Resultant Trip generation associated with delivery and servicing activities was split into residential and commercial and presented as: AM peak a total of 4 additional trips, (2 and 2 respectively), whereas for PM peak a total of 2 additional trips, (0 and 2).</p> <p>Two loading bays have been included in this proposal a number which was derived using the servicing database of the transport consultant under certain measures. Servicing bays are shown to be located within the courtyard.</p> <p>A drawing ref: 00116 rev P1 contained on the shows tracking of the 9m refuse vehicle using the loading / servicing area in the courtyard.</p> <p>This has not been agreed with refuse/ recycling service providers, hence recommend</p> <p>Condition (include parts: a,b,c)</p>	
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	<p>a) showing that the applicant has consulted and agreed with the appropriate departments.</p> <p>This area must be constructed to withstand the vehicle loads and maintained by the developer, thereafter.</p> <p>b) courtyard area used for servicing deliveries to be constructed as such that it does withstand the highest vehicle load</p> <p>One assumption made was that vehicle management /booking system was in place. In order for this assumption to be accepted as valid, it must be secured through a Condition.</p> <p>c) details and implementation of booking system and vehicle management.</p> <p>9.0 Construction Logistic Plan</p> <p>In order to manage construction of this proposal the Construction Logistic Plan (CLP) should be submitted. This could be covered by a condition.</p> <p>Condition: Further details to be submitted and agreed, prior to start of the construction phase. Highways Authority(HA) must be notified before the construction phase has started. The construction traffic must be co-ordinated with other approved proposals in the area. Temporary access points may be required during the construction phase.</p> <p>Managing of the deliveries is proposed via booking system, with pre-arranged slots and allowing sufficient time to carry loading/unloading.</p> <p>Construction traffic to/from the site must avoid highway network peak times. All routes and n timings should be agreed in advance with the local HA.</p> <p>Reason: to co-ordinate the construction traffic routes, generated to/from the site.</p> <p>Also,</p> <ol style="list-style-type: none">1. vehicles involved in construction should be part of Fleet Operator Recognition Scheme (FORS)2. include swept paths of the largest vehicle that will enter/exit the site, and turnings3. No temporary car parking for staff and personnel involved in the construction of this development. <p>The developer and/or their appointed contractor, must:</p>	
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	<p>-display contact details of the project manager at all times. - have a communication plan to contain: first point of contact, how the developer will inform residents and others affected, for example: informing about road closures, alternative route/s, duration of works etc.</p> <p>The developer is responsible in promoting the use of public transport to, all staff and personnel involved in the construction of this development. Staff/personnel should be aware of public transport provisions in the area, and aim to use sustainable modes of transport.</p> <p>A travel plan for personnel involved in the construction, showing routes to and from site, is considered a part of the CLP. Other travel plan measures should be included and reported to the LBH , as part of monitoring process. The applicant to agree the method of working with local HA prior to the start of construction.</p> <p>In addition:</p> <ul style="list-style-type: none"> •Please include Informative(s) about Highways licences. The applicant must check and follow the processes and apply direct to the HA <p>Recommendation</p> <p>On behalf of Highway Authority, I recommend this proposal for approval, subject to including Conditions sought contributions for the S106.</p>	
<p>LBH Environmental Health</p>	<p>The following comments are made with consideration of the environmental information that has been submitted.</p> <p>Air Quality:</p> <p>The application site is located back from the nearest main road Seven Sisters High Road, a major route for which modelling indicates likely exceedences of the Government's air quality objectives for nitrogen dioxide (NO2) and PM2.5. The proposed development is adjacent an air quality NO2 hotspot location. The whole of the borough of Haringey is a designated Air Quality Management Area (AQMQ) and is committed to being a 'Cleaner Air Borough' and working towards improving air quality and to minimise the</p>	<p>Comments Noted. Air Quality, Land Contamination, Energy are addressed in Section 6 of the report.</p>

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	<p>risk of poor air quality to human health and quality of life for all residents.</p> <p>The main air polluting operations associated with the proposed development include 18 car parking spaces and associated traffic movements and a total of 183 cycle spaces. With regard to Energy use, the development is considered too small for CHP and instead a 'community gas boiler for dwellings and commercial units 'will be installed and photovoltaics.'</p> <p>An air quality assessment (XCO2 , December 2017, ref: 9.006) has been submitted along with the planning application to assess the air pollution impact of the proposed development. This assessment states that '...it is considered that redevelopment of the site would not cause a significant impact on local air quality.'</p> <p>The London Plan, Policy 7.14 states that new development should:</p> <ul style="list-style-type: none">• minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans• promote sustainable design and construction to reduce emissions from the demolition and construction of buildings;• be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).• Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site. <p>I recommend the following conditions:</p> <p>Combustion and Energy Plant:</p> <ul style="list-style-type: none">• Prior to installation, details of the Ultra Low NOx boilers for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and	
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	<p>domestic hot water shall have dry NOx emissions not exceeding 20 mg/kWh.</p> <p>Reason: To protect local air quality.</p> <ul style="list-style-type: none">• Prior to commencement of the development, details of the CHP must be submitted to evidence that the unit to be installed complies with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for Band B. A CHP Information form must be submitted to and approved by the LPA. <p>Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction.</p> <p>Contaminated land: (CON1 & CON2)</p> <p>CON1:</p> <p>Before development commences other than for investigative work:</p> <p>a) Using the information within the Phase 1 Desk-top study, (Soils Ltd, Reference: 16176/DS Rev1.03. dated April 2017), a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. This shall be submitted to, and approved in writing by the Local Planning Authority prior to that investigation being carried out on site. The investigation must be comprehensive enough to enable:-</p> <ul style="list-style-type: none"><input type="checkbox"/> a risk assessment to be undertaken,<input type="checkbox"/> refinement of the Conceptual Model, and<input type="checkbox"/> the development of a Method Statement detailing the remediation requirements. <p>The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.</p> <p>b) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.</p>	
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	<p>□ CON 2</p> <p>Before development is occupied:</p> <p>c) 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.</p> <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>Management and Control of Dust:</p> <ul style="list-style-type: none">No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment. <p>Reason: To Comply with Policy 7.14 of the London Plan</p> <ul style="list-style-type: none">Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA. <p>Reason: To Comply with Policy 7.14 of the London Plan</p> <ul style="list-style-type: none">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 IIIA 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.	
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	<p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</p> <ul style="list-style-type: none"> 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. <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</p> <p>As an informative:</p> <p>Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
<p>LBH Environmental Health – Noise</p>	<p>I have read the Environmental Noise Survey Report (dated 3rd October 2017- ref: 17391-R01-A) and Planning Noise Report (dated 27th November 2017- ref: 17391-R02-B) produced by Mr Nicolas Lum and Mr Andrew Long respectively of Sandy Brown Consultants in Acoustics, Noise & Vibration. There is no objections made in principle to this proposed development, however the following conditions shall apply,</p> <p>1) Internal Noise Levels within Residential Units – Design (LBH Environmental Health – Noise)</p> <p>The constructed development shall be in accordance with Section 7.3 of the approved document Planning Noise Report detailing a façade sound insulation performance of Rw+Ctr 27 dB or greater (inclusive of acoustic Standard hermetically sealed thermal double glazing and acoustic trickle vents).</p> <p>REASON: to ensure high quality residential development</p> <p>2) Internal Noise Levels within Residential Units – Maximum Noise (LBH Environmental Health – Noise)</p>	<p>Comments noted. Noise issues are addressed in the Amenity and Residential Quality sections of the report.</p>

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	<p>The internal noise levels within the proposed residential units (with the windows closed) shall be in accordance with BS8233:2014 as detailed below:</p> <table border="0"> <tr> <td>Time</td> <td>Area</td> <td>Maximum Noise level</td> </tr> <tr> <td>Daytime Noise</td> <td>7am – 11pm</td> <td>Living rooms & Bedrooms 35dB(A)</td> </tr> <tr> <td></td> <td>Outdoor Amenity</td> <td>55dB(A)</td> </tr> <tr> <td>Night Time Noise</td> <td>11pm -7am</td> <td>Bedrooms 30dB(A)</td> </tr> </table> <p>With no more than 10 individual events to exceed 45dB LAmax (measured with F time weighting) between 23.00hrs – 07.00hrs.</p> <p>REASON: To ensure high quality residential development</p> <p>3) Plant Noise (LBH Environmental Health – Noise)</p> <p>Noise arising from the use of any plant and associated equipment shall not increase the existing background noise level (LA90 15mins) when measured (LAeq 15mins) 1 metre external from the nearest residential or noise sensitive premises. The applicant shall also ensure that vibration/structure borne noise derived from the use of the extractor fan does not cause nuisance within any residential unit or noise sensitive premises, for as long as the developer hereby approved endures.</p> <p>REASON: to ensure high quality residential development and protect the amenity of the locality.</p> <p>4) Commercial Music Studio Design (LBH Environmental Health – Noise)</p> <p>The Commercial Music Studio located in the basement of the proposed development shall be so designed that amplified or non-amplified sound generated from within shall not increase the background noise level (LA90 15mins) in any one-third octave centre frequency band, when measured (LAeq 15mins) within any residential or noise sensitive premises.</p> <p>REASON: to protect the amenity of the locality.</p>	Time	Area	Maximum Noise level	Daytime Noise	7am – 11pm	Living rooms & Bedrooms 35dB(A)		Outdoor Amenity	55dB(A)	Night Time Noise	11pm -7am	Bedrooms 30dB(A)	
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	<p>5) Scheme of Sound Insulation (LBH Environmental Health – Noise)</p> <p>Prior to the commencement of the development, details of a sound insulation scheme to be installed between the commercial premises on the ground floor and residential premises on the first floor shall be submitted in writing to and for approval by the Local Planning Authority. The scheme shall be submitted following consultation with the Environmental Health Officer. The scheme shall be installed as approved prior to any commercial occupation of the site, including the music studio, and shall be maintained thereafter.</p> <p>REASON: to protect the amenity of the locality.</p> <p>6) Construction and Demolition Noise</p> <p>Prior to the commencement of the development, a Site Environmental Management Plan (SEMP) pertaining to the control of noise and vibration (in general conformity with the approved document Construction Management Plan produced by Haig dated 6th December 2017) shall be submitted in writing to and for approval by the Local Planning Authority. The SEMP shall be implemented as approved and endure for the duration of the construction phase of the development.</p> <p>REASON: to protect the amenity of the locality.</p>	
<p>LBH Local Lead Flood Authority</p>	<p>Further to my previous email, I've now looked through the file that we have on the site and reviewed the information that was supplied to us, we held several meetings with the drainage consultants and worked through a few issues that came up at the Pre-App.</p> <p>We agreed and approved the runoff rates along with the underground drainage proposal. We now want to see final detailed drawings if they haven't already been supplied and a maintenance management plan for the system, this must be for the lifetime of the development and who will be responsible for the maintenance.</p> <p>Overall, the drainage strategy that is proposed is acceptable and can be approved subject to the above.</p>	<p>Comment noted. Conditions imposed.</p>
<p>LBH Tree & Nature Conservation Manager</p>	<p>The proposed new development at the Bernard works site will result in the loss of the existing open space on Herbert Road and all of the 12 trees currently present. The majority of these trees are either in a poor condition or are of low quality and value and should not be an impediment to development. Two trees (T1:</p>	<p>Comments noted. Trees and ecology are addressed</p>

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	<p>Lime and T8: Norway maple) are of moderate quality and value. They have been assessed for a TPO and meet the criteria.</p> <p>In my opinion, the loss of T1 and T8 would be mitigated by the planting of new trees in and around the new development. The New Tree and Specimen Shrub Plan (Drawing SP00) shows the location of over 50 new trees in highway locations and within a new public space. It includes 9 new trees in Herbert Road, 7 of which would be in front of the proposed new homes. There are also 25 additional specimen shrubs to be planted in residential gardens. The proposed new trees are appropriate for such a scheme and include a mixture of different species in various sizes. Many of the new trees are native species, which will greatly increase local biodiversity. The number and variety of new trees will help to mitigate the loss of the existing trees, improve screening of the site and local air quality, while also enhancing the quality of life for existing and future residents and visitors to the area.</p>	<p>in Section 6 in the report.</p>
<p>LBH Carbon Management</p>	<p>Due to the unique nature of this development, the energy efficiency measures that are to be installed on development will not save any carbon emissions. And there are no proposed savings from the community heating and hot water systems, but it is confirmed that a single heating and hot water system will be installed across all units. The carbon savings from renewable technologies (Solar PV) is 7.9%</p> <p>This means that the development gives an overall saving of 3.4% against building regulation 2013 on regulated energy and the applicant has agreed to offset the remaining emissions. While this is low, the buildings design and mixed used element explains this. And the developer has offered to offsetting the remaining emissions at a cost of £382,305.00.</p> <p>These measures, alongside the site wide energy network, makes the scheme policy compliant and should be secured through conditions and legal agreement.</p> <p>Suggesting condition (1) You must deliver the Energy measures as set out in Energy Strategy Report - Bernard Works by Renewable Environmental Services, dated the 8th December 2017.</p> <p>The development shall be constructed in strict accordance of the details so approved, and shall achieve the agreed carbon reduction of 3.4% reduction beyond BR 2013. This shall include:</p> <ul style="list-style-type: none"> - A single heating and hot water system, powered by a single energy centre and serving all units (residential and non-domestic) on the site; 	<p>Comment noted. Energy issues are addressed in Section 6 in the report.</p>

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	<p>- A 30 kWp of PV system covering 150m² of flat roof area (including access) to accommodate the estimated PV capacity</p> <p>The equipment and materials to deliver this standard shall then be maintained as such thereafter.</p> <p>Confirmation of these measures and standards being achieved must be submitted to the local authority at least 6 months of completion on site for approval and the applicant must allow for site access if required to verify delivery.</p> <p>The Council should be notified if the applicant alters any of the measures and standards set out in the submitted strategy (as referenced above). Any alterations should be presented with justification and new standards for approval by the Council.</p> <p>Should the agreed target not be able to be achieved on site set out in the afore mentioned strategy, then any shortfall should be offset at the cost of £2,700 per tonne of carbon plus 10% management fee.</p> <p>Reason: To comply with London Plan Policy 5.2. and local plan policy SP:04</p> <p>Suggested Condition (2) Details of the construction standard of the site wide energy network and its ongoing operation shall be confirmed to the Council 3 months prior to any works commencing on site. These details shall include:</p> <ul style="list-style-type: none">a) Confirmation that the site wide heating and hot water network has been designed and shall be constructed following the CIBSE / ADE Heat Networks Code of Practise; andb) Confirmation that the operator of the heating and hot water network shall achieve the standards set out in the Heat Trust Scheme. And that the developer will sign up to this standard to ensure that users have transparency of costs for customer protection. The Heat Trust Scheme standards and membership shall then be continued for the life of the heating and hot water network on the site, unless a regulatory scheme takes its place. <p>REASON: To ensure the facility and associated infrastructure are provided in line with London Plan policy 5.7 and local plan SP:04 and DM 22.</p>	
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	<p>Suggested Legal Agreement The Owner agrees to pay the Carbon Offset Contribution of £382,305.00 to the Council upon commencement on site. This contribution will be used to deliver carbon reduction projects and programmes across the borough in line with Policy 5.2 of the London Plan.</p> <p>Sustainability The scheme has submitted a sustainability statement on the sustainability measures that will be incorporated into the construction of the residential building and the non-domestic units on the scheme. These show policy compliance and should be conditioned to be delivered during the construction of the scheme.</p> <p>Suggested Condition You must deliver the sustainability measures for the residential development as set out in the Bernard Works, Home Quality Mark (HQM) Assessment by Renewable Environmental Services, dated the 7th December 2017.</p> <p>The residential part of the development shall be constructed in accordance of the details so approved, and shall achieve the agreed rating of Home Quality Mark level 3 and shall be maintained as such thereafter. A post construction certificate or evidence shall then be issued by an independent certification body, confirming this standard has been achieved. This must be submitted to the local authority at least 6 months of completion on site for approval.</p> <p>In the event that the development fails to deliver the agreed measures on 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.</p> <p>Reasons: In the interest of addressing climate change and to secure sustainable development in accordance with London Plan (2011) polices 5.1, 5.2,5.3 and 5.9 and policy SP:04 of the Local Plan.</p> <p>Suggested Condition</p>	
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	<p>The non-domestic parts of the development shall be constructed following the BREEAM New Construction (2014 ed). Assessment methodology and shall achieve the agreed rating of “very good”. These measures shall then be maintained as such thereafter.</p> <p>A post construction certificate or equivalent evidence, shall then be issued by an independent certification body, confirming this standard has been achieved. This must be submitted to the local authority at least 6 months of completion on site for approval.</p> <p>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.</p> <p>Reasons: In the interest of addressing climate change and to secure sustainable development in accordance with London Plan (2011) polices 5.1, 5.2,5.3 and 5.9 and policy SP:04 of the Local Plan.</p> <p>Biodiversity The applicant has undertaken an Ecological Assessment of the site, which recommends the integration of in bird and bat boxes across the site for enhancing the current biodiversity on the site. This should be conditioned and delivered on site.</p> <p>Suggested Condition You must deliver the Biodiversity features as set out in the submitted report “Preliminary Ecological Appraisal” by MKA Ecology (dated July 2017)</p> <p>This will include:</p> <ul style="list-style-type: none">- 4 bat boxes on new buildings facing between south and east orientations- 4 Swift boxes facing between the north and east orientations of the buildings- 4 Sparrow boxes facing between the north and east orientations of the buildings- 4 starling boxes facing between the north and east orientations of the buildings- New vegetation on the site that supports foraging and commuting for bats and breeding and foraging for birds	
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	<p>The development shall then be constructed in accordance of the details so approved, and shall provide evidence of these measures to the local planning authority no more than 3 month after construction.</p> <p>Once installed these measures shall be maintained as such thereafter.</p> <p>In the event that these measures are not installed a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 4 months of completion on site. 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.</p> <p>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity. In accordance with regional policies 5.3, 5.9 and 5.11 of the London Plan (2011) and local policy SP:05 and SP:13.</p>	
EXTERNAL CONSULTEE		
Transport for London	Many thanks for consulting TfL on the above application, as the site is not on or is not in close proximity to the Transport for London Road Network or the Strategic Road Network, TfL has no comments to make on the application.	Noted
Thames Water	<p>Waste Comments</p> <p>Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.</p> <p>There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit thameswater.co.uk/buildover</p>	Noted. Conditions and Informatives Attached.

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	<p>No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement. Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.</p>	
<p>Metropolitan Police Design Out Crime</p>	<p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference to the above application I have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on available information, including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>1.0 It is my professional opinion that crime prevention and community safety are material considerations, because of the proposed use, design, layout and location of the development proposed.</p> <p>1.1 To ensure the delivery of a safer development in line with Local Development Framework policies CP17, DC33 and DC63 (See Appendix for details of these policies), I have highlighted some of my main areas of concern in Section 3 and in section 4 have recommended the attaching of a suitably worded condition.</p> <p>Recommendations:</p> <p>2.0 I can confirm that I have met favourably with the project architects and their consultant in September 2017 in order to discuss the aspirations for the site. I have reviewed the planning application and due to specific areas of concern (See 3.0 below) the Metropolitan Police request a specific condition requiring the developer to</p>	<p>Noted. Condition attached.</p>

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	<p>achieve Secure by Design accreditation for the entire proposed development.</p> <p>Concerns:</p> <p>3.0 In summary, officers from the design out crime team have a number of site specific concerns in relation to this application and these are outlined in Appendix 3. However a condition requiring the developer to engage with both the police and the local authority to achieve 'secured by design' accreditation/status, would reassure police and mitigate a many of these concerns.</p> <p>Community Safety – Secured by Design Conditions:</p> <p>4.0 Crime prevention and community safety are material considerations. If the L.B. Haringey are to consider granting consent, I would ask that the conditions detailed below be attached. This is to mitigate the impact and deliver a safer development in line with national, regional and local planning policies. I would also like to draw your attention to Section 17 CDA 1988 and the NPPF, (See appendix) in supporting my recommendations.</p> <p>4.1 (1) I request that prior to carrying out above grade 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 full Secured by Design' Accreditation.</p> <p>The development shall only be carried out in accordance with the approved details.</p> <p>(2) 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.</p> <p>(3) The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) for each building or phase of the development and accreditation must be achieved according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development.</p> <p>The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p> <p>Crime Figures:</p> <p>5.0 Crime and disorder is a factor for consideration with this application. Crime data</p>	
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	<p>affecting this application are highlighted in appendix 2 below. Legislation & SBD Guidance:</p> <p>6.0 SP11: Design 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. To achieve this all development shall:</p> <ul style="list-style-type: none">▪ Incorporate solutions to reduce crime and the fear of crime, such as promoting social inclusion; creating well-connected and high quality public realm that is easy and safe to use; and by applying the principles set out in 'Secured by Design' and Safer Places;▪ Seek the highest standards of access in all buildings and places; <p>6.1 Whilst I accept that with the introduction of Approved Document Q of the Building Regulations from 1st October it is no longer appropriate for local authorities to attach planning conditions relating to technical door and window standards. I would encourage the planning authority to note the experience gained by the UK Police Service over the past 26 years in this specific subject area. That experience has led to the provision of a physical security requirement considered to be more consistent than that set out within Approved Document Q of the Building Regulations (England); specifically the recognition of products that have been tested to the relevant security standards but crucially are also fully certificated by an independent third party, accredited by UKAS (Notified Body). This provides assurance that products have been produced under a controlled manufacturing environment in accordance with the specifiers aims and minimises misrepresentation of the products by unscrupulous manufacturers/suppliers and leads to the delivery, on site, of a more secure product. I would therefore request that the benefits of certified products be pointed out to applicants and that the Local Authority encourages assessment for this application. For a complete explanation of certified products please refer to the Secured by Design guidance documents which can be found on the website. www.securedbydesign.com .</p> <p>Conclusion: I would ask that my interest in this planning application is noted and that I am kept apprised of developments.</p> <p>Additionally, I would welcome the opportunity of sitting in on any meeting you might have</p>	
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	<p>concerning this proposal. Should the Planning Authority require clarification of any of the above comments please do not hesitate to contact me at the above office.</p> <p>Yours sincerely, PC Lee Warwick 463TP Designing Out Crime Officer Metropolitan Police Service</p> <p>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.</p> <p>Appendix 1 SP11: Design 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. To achieve this all development shall:</p> <ul style="list-style-type: none">▪ Incorporate solutions to reduce crime and the fear of crime, such as promoting social inclusion; creating well-connected and high quality public realm that is easy and safe to use; and by applying the principles set out in 'Secured by Design' and Safer Places;▪ Seek the highest standards of access in all buildings and places; <p>DC63 DELIVERING SAFER PLACES from the Development Control Policies DPD sets out that planning permission will only be granted for proposals which suitably address a set of aims that reflects the seven attributes of sustainable communities linked to crime prevention, as set out in the Communities and Local Government publication 'Safer Places – The Planning System and Crime Prevention'. Applicants are required to adopt the principles and practices of the 'Secured by Design' scheme in the application of this policy.</p> <p>DC33 CAR PARKING from the Development Control Policies DPD sets out that private off-street car parking in new developments needs to achieve Secured by Design standard (or equivalent methodology).</p> <p>The Supplementary Planning Documents 'Designing Safer Places' and 'Landscaping' provide further additional guidance supporting the recommendations.</p> <p>Section 17 of the Crime and Disorder Act 1988 states "It shall be the duty of each Authority to</p>	
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	<p>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 it's area", as clarified by PINS953.</p> <p>The National Planning Policy Framework (NPPF) states that "Planning policies and decisions should aim to ensure that developments create:</p> <ul style="list-style-type: none">□ Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion <p>Appendix 2</p> <p>Crime Figures: The crime figures provided below are publicly available on the Internet at http://www.met.police.uk/crimefigures/ . 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 behavior and disorder both of which have a negative impact on quality of life issues.</p> <p>Havering is one of 32 London Boroughs policed by the Metropolitan Police Service. It is promoted as one of the safer boroughs, but nonetheless crime and disorder are still a major issue for its residents.</p> <p>The following figures relate to recorded crime data from Police.uk</p>	
	<p>Appendix 3</p> <p>Consultation was held with the architect in Sept 2017 and the following additional issues with the devleopment were highlighted in regards to antisocial behaviour and crime. They explained their vision to enhance the area through architectural design and agreed to participate in the SbD scheme. The discussion points have been incorporated into the recommendations.</p> <p>1.0 General recommendations Residential</p> <p>1.1 Public Realm</p> <p>Routes for pedestrians, cyclist and vehicles should be open, direct and not segregated from each another.</p> <p>Public footpaths should not run to the rear of, and provide access to gardens, rear yards or dwellings.</p> <p>Communal areas, such as playgrounds, seating or drying areas should be designed to allow</p>	

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	<p>supervision from nearby dwellings with safe routes for users to come and go. Windowless gable end walls adjacent to spaces for which the public have access should be avoided, as this prevents natural surveillance.</p> <p>1.2 Boundaries/Gates Side and rear boundaries should be 2.1m in height (minimum), be positioned where possible at the front of the building line (if a recess is necessary, then not to exceed 600mm) and designed to avoid climbing aids. This can be achieved in a variety of different ways, i.e. close board, panel, etc. but if a trellis topping is to be used, this should be diamond style trellis. Fencing between rear gardens should be 1.8m in height (minimum) and designed to avoid climbing aids.</p> <p>Side gates should provide vision, be positioned where possible at the front of the building line, (if a recess is necessary, then not to exceed 600mm) 2.1m in height (minimum) and designed to avoid climbing aids, particularly around the hinges and locking mechanism.</p> <p>1.3 Communal doors/entrances Recessed doorways should not exceed 600mm. Communal doorsets should be certificated to LPS 1175 Issue 7:2010 Security Rating 2 or STS 202 Issue 3:2011 Burglary Rating 2. To mitigate against additional usage expected. All glazing in and adjacent to communal, front, back and doors and ground floor windows and windows that are easily accessible above ground floor level, should incorporate one pane of laminated glass meeting the requirements of BS EN 356:2000 class P3A. Communal entrance doors should have vandal resistant audio, visual access control panels, with electronic lock release - tradesperson release buttons are not permitted. Electronic access control proximity 'keys' and readers should be security encrypted to protect against unauthorised copying.</p> <p>Communal doorsets should incorporate an automatic closing mechanism, automatic deadlock, with internal thumb turn, knob or handle - external entry should be restricted by key, key code, key fob, proximity reader or combination thereof. Communal doorsets should be single leaf, self-locking, self-closing with two maglocks, positioned one third from the top and bottom.</p> <p>A communal entrance requires protection from unauthorised entry (tailgating). To reduce the</p>	
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	<p>risk of “tailgating” a certified secondary door will be fitted which creates an airlock or residential lobby. The secondary doorset must be fob accessed and provide vandal resistant audio access control for visitors. The doorset must be self-locking, self-closing, with two maglocks positioned one third from the top and bottom</p> <p>Communal Lobby to incorporate mail delivery system and be compliant with DHF TS009</p> <p>CCTV – An additional camera is to be installed in the lobby area to protect the communal entrance and the mail delivery system.</p> <p>1.4 Access control</p> <p>Lifts and stairwells must incorporate access control for residential use with fob access control on the stairs to each floor and push button release into the stair core to escape (check with fire strategy)</p> <p>Lifts to be access controlled (smart lifts) to prevent unwanted visitors gaining access to upper floors</p> <p>Fire brigade access control box to be located in the lobby area utilising GERDA key system</p> <p>1.5 Residential doors/windows</p> <p>All easily accessible doorsets, including front, back, French, patio and balcony doors, should be certificated to either PAS 24:2016, LPS 1175 Issue 7:2010 Security Rating 2, STS 201 Issue 4:2012, STS 202 Issue 3:2011 Burglary Rating 2, or LPS 2081 Issue 1:2014 Security Rating B.</p> <p>Due to crime problems associated with letter plate apertures, such as arson, hate crime, lock manipulation and 'fishing', Secured by Design strongly recommends, where possible, mail delivery via a secure external letter box within the “lobby area” or delivery ‘through the wall’ into a secure area of the building.</p> <p>All sliding and bi-fold doorsets not designated as the primary access/egress route should meet the same physical attributes as above.</p> <p>A door chain or opening limiter and internal letterbox shield should be fitted to all individual dwelling front doors.</p> <p>A door viewer should be fitted at a height of between 1200mm to 1500mm from the bottom of all front doors (not required with adjacent unobscured glazing).</p>	
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	<p>All easily accessible windows should be certificated to either PAS 24:2016, LPS 1175 Issue 7:2010 Security Rating 1, STS 204 Issue 3:2012, or LPS 2081 Issue 1 Security Rating A.</p> <p>All easily accessible windows should have key operated locks. Where windows are required under Building Regulations to act as a fire escape route, the opening window must not have key operated locks.</p> <p>Windows that form an integral part of the doorframe should be shown to be part of the manufacturer's certificated range of doorsets. Alternatively where windows are manufactured separately from the doorframes, they should be certificated to either PAS 24:2014, LPS 1175 Issue 7:2010 Security Rating 1, STS 204 Issue 3:2012 or LPS 2081 Issue 1:2014. In such cases the window should be securely fixed to the doorset in accordance with the manufacturer's requirements.</p> <p>Secure external mailboxes to serve each property should be fixed to the external face of the building or within the communal entrance void. Mailboxes to conform TS009:202 accreditation</p> <p>1.6 Balconies / Terraces</p> <p>Enclosures to balconies at all levels should be designed to exclude handholds and to eliminate the opportunity for climbing up, down or across between balconies.</p> <p>Drainpipes/soil pipes that provide access to flat roofs or balconies will require metal shrouds to prevent climbing (regardless of whether they are PVC'u or not).</p> <p>1.7 Parking</p> <p>Car parking areas should be close to the properties they serve, with good natural surveillance from regularly habitable rooms of adjacent properties, i.e. living rooms and kitchens.</p> <p>1.8 Refuse Storage – Residential only</p> <p>There are two forms of refuse storage within the development, single access from inside building perimeter and dual access which includes access from outside of the building perimeter. These require different levels of security appropriate to the risk attached.</p> <p>Single Access - Bin storage areas should be enclosed and incorporate a self-closing, self-locking mechanism, with dual maglock (one third top and bottom) with push button release. Slam-shut BS 8621 lock with internal thumb turn may be utilised as an alternative, but this relies on all residents having possession of an additional key (Note - dual certification is required for fire and security)</p> <p>Access into the refuse area should be via fob access for residents only, with push button release,</p>	
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	<p>for electronic dual maglocks Door should be certificated to either PAS 24:2016 or LPS 2081 Issue 1:2014 Security Rating B. (Note - dual certification is required for fire and security) Dual Access - Doors entering into the refuse store from the outside of the building perimeter should be single leaf, self-locking, self-closing and certificated to LPS 1175 Issue 7:2010 Security Rating 2 (Note - dual certification is required for fire and security) Door entering into the store via the fabric of the building to be certified to be certificated to either PAS 24:2016 or LPS 2081 Issue 1:2014 Security Rating B. (Note - dual certification is required for fire and security) Access and Egress into the dual access refuse store requires fob access in and out of the store for residents only via the internal door and fire exit is via the external door. (Exit strategy to be confirmed by LFB)</p> <p>1.9 Cycle Storage – Residential only Cycle storage areas should, ideally be enclosed and built into the fabric of the building, be visibly permeable, incorporating a self-closing, self-locking, single-leaf door mechanism with dual maglock fob control access into the cycle store and push button release to exit. Doors entering into the cycle store from the fabric of the building should be certificated to either PAS 24:2016, LPS 2081 Issue 1:2014 Security Rating B. (Note - dual certification is required for fire and security)</p> <p>1.9 External Lighting / Alarm Systems, etc. All street lighting for both adopted highways and footpaths, private estate roads, footpaths and car parks, should comply with BS 5489. The overall uniformity of light is expected to achieve 40% and should never fall below 25%. The colour rendering qualities should achieve 60 (minimum) on the Colour Rendition Index - certification will be required. External lighting should be switched using a photoelectric cell (dusk to dawn) with a manual override. Utility meters should, where possible, be sited outside the front of the dwelling - alternatively they should be sited on the ground floor, between access-controlled doors (air lock system). A 13amp non-switched fuse spur, suitable for an alarm system, should be provided - if a full alarm system is provided, it should comply with: BS EN 50131 & PD6662 (wired system) BS 6799 (wire free system)</p>	
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	<p>2.0 Commercial</p> <p>Whilst it is appreciated that commercial properties primarily focus on BREEAM accreditation, the commercial units within this development are part of a tethered tenancy which links the resident directly to a commercial unit below where they live. This brings many advantages (ownership, constant capable guardian etc), it may also bring additional risk of crime due to the fact that the commercial units will be seen as part of the living space of the resident.</p> <p>2.10 Glazed curtain walling and window walls</p> <p>SBD recognises four distinct types of glazed wall systems. These are:</p> <ol style="list-style-type: none">i. Large glazed units connected by a spider clamp system;ii. Glazed units directly retained within a framing system (usually aluminium);iii. Framed windows installed within a separate framing system;iv. Framed windows connected to other framed windows to create a 'window wall'. <p>Glazed curtain walling (i and ii above) must be installed using a secure glazing retention system. The method of retaining the glass must include one or more of the following:</p> <ul style="list-style-type: none"><input type="checkbox"/> Security glazing tape;<input type="checkbox"/> Dedicated security sealant or gasket;<input type="checkbox"/> A secure mechanical fixing system (evidence will be required to prove the system is secure. This may be achieved by utilising the specific glazing retention test within PAS 24:2012, PAS 24:2016 or by an indicative test on the retention system to LPS 1175: Issue 7 SR1, LPS 2081 Security Rating A or STS 202: Issue 3, BR1). <p>Framed windows (iii and iv above) used within the construction of a 'window wall' must meet the requirements in Section 2, paragraphs 64.</p> <p>Attack resistant glazing, as defined in Section 2, paragraphs 61 to 61.3, is required where the glazing is easily accessible (see glossary of terms).</p> <p>The following British Standard 'Codes of Practice' are relevant:</p> <ul style="list-style-type: none"><input type="checkbox"/> BS 5516-1: 2004 Patent glazing and sloping glazing for buildings. Code of practice for design and installation of sloping and vertical patent glazing;<input type="checkbox"/> BS 5516-2: 2004 Patent glazing and sloping glazing for buildings. Code of practice for sloping glazing. <p>2.20 Roof design and access and aids to climbing</p>	
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	<p>Preventing easy access to roofs should be considered at the design stage of the building.</p> <p>External rainwater pipes can be used for climbing and should be either square or rectangular in section, flush fitted against the wall or contained within a wall cavity or covered recess. Bends in pipes and horizontal runs should be minimised. Physical barriers should be used to prevent access to an existing roof. Pipes should be made of fire-resistant material.</p> <p>Flat roofs, particularly those at a low level, may be more easily accessed and, depending on their construction materials, may be more vulnerable to intrusion either by cutting through the deck or forcing open roof lights and other openings</p> <p>Note 24.3: Attention is drawn to relevant legislation (including the Occupier's Liability Act 1984) concerning the responsibilities and liabilities of building owners/occupiers for the safe use of roof areas and relevant signage.</p> <p>2.30 Front Access – doors</p> <p>Doors providing access and egress into the commercial premises via the courtyard should be single leaf, self-locking, self-closing and certificated to LPS 1175 Issue 7:2010 Security Rating 2 (Note - dual certification is required for fire and security)</p> <p>2.31 Front Access – roller shutters</p> <p>If roller shutters are to be utilised behind the glass wall/entrance doors to mitigate against the size of the doors, then these must conform to</p> <ul style="list-style-type: none"><input type="checkbox"/> LPS 1175 Issue 7:2010 Security Rating 1;<input type="checkbox"/> LPS 2081 Issue 1:2014 Security Rating A. <p>3.0 Lighting general</p> <p>A good lighting scheme is one that has been designed to be energy efficient, distributing an appropriate amount of light uniformly, whilst minimising light pollution.</p> <p>The objective of security lighting is to deter criminals by providing an environment that will deny them the opportunity of the cover of darkness and maximise the potential for them to be observed. The lighting scheme should be designed to achieve the following criteria.</p> <ul style="list-style-type: none"><input type="checkbox"/> 10 Lux	
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	<ul style="list-style-type: none"><input type="checkbox"/> 25% minimum uniformity<input type="checkbox"/> A minimum of 60 on the CRI<input type="checkbox"/> Controlled via dusk till dawn photoelectric cell<input type="checkbox"/> A minimum of 40 Lumens per Watt<input type="checkbox"/> Does not pollute. <p>4.0 External lighting</p> <p>Adequate, uniform lighting should cover the entire property. The emphasis should be on installing low glare/high uniformity lighting levels in line with British Standard 5489-1 of 2013. Licensed premises with their own dedicated car parking facilities should take due regard to the lighting requirement set out in BS 5489-1.</p> <p>The Colour rendering qualities of lamps used in an SBD development should achieve a minimum of at least 60Ra on the Colour Rendering Index (Note 4.2).</p> <p>Note 4.2: The Colour Rendering Index, scaled from 0 to 100 indicates the colour rendering qualities of lamps. 0 is a non-existent ability to render colour under illumination, such as low pressure sodium lamps (SOX) (not allowed under BS5489:2013), and 100 is the colour rendering qualities of daylight. The higher the RA the better the colour rendition qualities. Properly optically controlled white light (higher than RA60) will enable humans to see more clearly and improves facial recognition than if the light has an RA of lower than 60 such as High Pressure Sodium (SON). This is because it falls into the Mesopic range of vision and therefore the eye uses both rods and cones to determine the image. The British Standard has different levels of lighting as part of its P classes which now take into account the Mesopic properties of each type of lamp and its effect on the human eye. This is called an S/P ratio and will be an additional factor when the designer is choosing the lighting class. Please note that C classes and M classes are not affected by this and do not have the scope to lower lighting levels due to the use of white light.</p> <p>The DOCO should always be provided with a 'Lux Plan' which shows both contour lines and lux points in order that the lighting system can be assessed. Additionally a risk and environmental assessment for the Construction Design Management (CDM) designer compliance requirements must be included. The plan should be compiled by a 'competent' independent designer with at least level 3 or 4 competency under the Institute of Lighting Professionals (ILP) guidance notes. The designer should be MILP and either IEng or CEng to be deemed competent to be able to design under CDM</p>	
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	<p>regulations. Manufacturer designed schemes without risk or environmental assessments will not be accepted as they do not cover the CDM designer risk elements which are required (Note 4.3).</p> <p>Note 4.3: The details on the plan must include the maximum average, minimum and average lux levels proposed. The plan must also show the Uniformity (Uo) and colour rendering (Ra) values for the scheme. Light pollution must be minimised.</p> <p>All living things adjust their behaviour according to natural light. The application of artificial light has done much to improve our experience of the night-time environment, but if this light is not properly controlled both physiological and ecological problems may occur. Minimising light emitted in directions where it is neither necessary nor desirable is extremely important. Obtrusive lighting from the private elements of the scheme is deemed a statutory nuisance (public lighting is not covered) and illuminating areas unintentionally is wasteful. SBD requires that only luminaires with suitable photometry serving to reduce light spill and upward light may be used.</p> <p>In terms of sustainability, consideration must be given to the consequences of turning off street lights. Such a measure may be counterproductive in terms of CO2 emissions and lead to the greater use of motor vehicles because residents are too afraid to use unlit streets. Crime levels, and in particular fear of crime levels, must also be carefully monitored to see what impact such an action has made to the community. The alternatives to switching off are Central Management Systems (CMS) which allow varying lighting levels for different times of the night and are centrally controlled by a Web based system. Also stand-alone dimming equipment can be pre-set to dim after an agreed time when most residents are asleep. Both systems are preferable to switching off. Some light sources are more controllable than others and these should be considered where possible. The most controllable light source with the correct RA is LED, it also has no UV or IR so therefore does not impact as heavily as other light sources on wildlife and birdlife.</p> <p>Presence sensing should not be considered unless in bin stores or rarely used areas as it can produce nuisance switching and become a problem to residents. Varying light levels via a CMS or stand-alone system reduces CO2, energy consumption and light pollution so</p>	
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	<p>is preferable where cost is not prohibitive and where the Council specification allows. Glare is also an issue and is defined by direct view of the light source. Luminaires without good optical or lens control should not be used in residential areas.</p> <p>Preferred external lighting should be of a 'white light' source. Note that low pressure sodium generates an orange glow and is not compatible with quality CCTV systems. It is advised that all lighting sources should be compatible with requirements of any CCTV system installed (see Section 2, paragraph 46.8)</p> <p>Lighting to all external doors and common entrances should be operated by photoelectric cell.</p> <p>Ensure adequate lighting of external storage areas, such as barrel stores.</p> <p>Where applicable, footpaths and parking areas, including bicycle and two-wheeled motor vehicle parking should also be illuminated in line with the above recommendations.</p> <p>5.0 Courtyard area – entrance</p> <p>The entrance into the courtyard requires additional protection to ensure that crime is kept to a minimum outside of working hours. Gated entrance was considered, but due to the locality of the commercial units and the access from the main road, this is not a feasible option.</p> <p>To mitigate against vehicle born intrusion raising bollards should be implemented to prevent uninvited vehicles entering the courtyard.</p> <ul style="list-style-type: none"><input type="checkbox"/> Gap between the bollards should be 1200mm maximum.<input type="checkbox"/> Bollards are to be a minimum of 600mm high.<input type="checkbox"/> Bollards are to be of 100mm minimum diameter.<input type="checkbox"/> Bollards will be controlled by fob access and visitor access will be controlled by audio visual access control. <p>To reduce/monitor pedestrian trespass outside of working hours a CCTV camera requires installation opposite the vehicle pedestrian entrance. The camera should provide images the full width of the entry point throughout both day and night, plus provide images to an evidential quality that achieve identification standard (with enhancement).</p> <p>Lighting scheme as specified in point 3.0 must be designed to complement the CCTV Strategy.</p> <p>6.0 Courtyard area – other considerations</p>	
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	<p>Refuse Storage - should be single leaf, self-locking, self-closing and certificated to LPS 1175 Issue 7:2010 Security Rating 2 with fob access into the cycle store and push button to exit (Note - dual certification is required for fire and security)</p> <p>Cycle Storage - Cycle racks must comply with either Sold Secure Bronze accreditation or graded as a BREEAM compliant product and must have two points of locking. should be single leaf, self-locking, self-closing and certificated to LPS 1175 Issue 7:2010 Security Rating 2 with fob access into the cycle store and push button to exit (Note - dual certification is required for fire and security)</p> <p>Mail delivery – via individual commercial unit during hours of operation. Is separate mail strategy desired then additional consultation should be made to ensure safe delivery.</p> <p>Intruder Alarm - A 13amp non-switched fuse spur, suitable for an alarm system, should be provided - if a full alarm system is provided, it should comply with: BS EN 50131 & PD6662 (wired system) BS 6799 (wire free system)</p>	
<p>Environment Agency</p>	<p>Thank you for consulting us on the above application. We have no objections to the proposals but would like to offer the following advice.</p> <p>Groundwater & Contaminated Land We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals.</p> <p>We recommend however that the requirements of the National Planning Policy Framework and National Planning Policy Guidance (NPPG) are still followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be additional to the risk to human health that your Environmental Health Department will be looking at.</p> <p>We expect reports and Risk Assessments to be prepared in line with our guidance available: https://www.gov.uk/government/collections/groundwater-protection .</p> <p>In order to protect groundwater quality from further deterioration: - No infiltration based sustainable drainage systems should be constructed on land affected by contamination as contaminants can remobilise and cause groundwater pollution.</p>	<p>Comments noted.</p>

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	<ul style="list-style-type: none"> - Piling or any other foundation designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution. - Decommission of investigative boreholes to ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water <p>End 2</p> <p>supplies in line with paragraph 109 of the National Planning Policy Framework.</p> <p>The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:</p> <ul style="list-style-type: none"> - From www.gov.uk: <ul style="list-style-type: none"> <input type="checkbox"/> Our Technical Guidance Pages, which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency’s Guiding Principles for Land Contamination) in the ‘overarching documents’ section <input type="checkbox"/> Use MCERTS accredited methods for testing contaminated soils at the site - From the National Planning Practice Guidance: <ul style="list-style-type: none"> <input type="checkbox"/> Land affected by contamination - British Standards when investigating potentially contaminated sites and groundwater: <ul style="list-style-type: none"> - BS5930:2015 Code of practice for site investigations; - BS 10175:2011+A1:2013 Code of practice for investigation of potentially contaminated sites; - BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points; - BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns and groundwater quality.) <p>All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. The competent person would normally be expected to be a chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.</p> <p>You may wish to consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed.</p> <p>If you have any queries please feel free to contact me on the details below.</p>	