Appendix 1: Consultation Responses from internal and external agencies

Stakeholder	Comments	Response
INTERNAL		
Design Officer	**Summary** This proposal is a well-designed redevelopment of an important part of an allocated site within the Wood Green Metropolitan Centre. The proposals would provide better quality, modern retail units in this important primary frontage and to an architectural design that would repair an important part of the High Road frontage comparable to the high quality Victorian and Edwardian retail parades nearby. Above this it would provide a significant amount of good quality new housing, designed to compliant space and amenity standards, notably including no north or south facing single aspect flats, very high daylight and sunlight levels for a higher density scheme, designed to appear as a sculptural cluster, well set back from street frontages, and despite being a taller building, having no detrimental impact on local views and microclimate. The proposals also include new townhouses fronting Bury Road, providing well designed new family sized affordable housing with private amenity space and reinstating a calm, convivial residential character to this section of this street. Finally, these proposals have been masterplanned and engaged in collaborative design with immediate neighbours to ensure it would complement and be coordinated with future developments, as part of improvements to Wood Green as a vibrant town centre that people can live, work and shop in safely, comfortably and amidst architectural delight. **Site Location and Context** 1. The site of this application is currently occupied by a single, large floorplate retail building, of mostly three storeys, with some four storeys. It was probably built in the early Post-War years of the mid-twentieth century, purpose-built for the Marks & Spencer's retail chain that vacated the site some two to three years ago. The existing building is not considered to have any architectural merit. The site sits the centre of the Borough of Haringey, in the heart of Wood Green town centre, right on Wood Green High Road, which connects Turnpike Lane tube station 200m to the south of the site with Wood Green Tube Station,	Comments noted. Materials to be controlled by condition.

Stakeholder	Comments	Response
	600m to its north. The High Road that runs along the south-western boundary of the site is a busy, vibrant shopping street that forms the heart of the Wood Green Metropolitan Shopping Centre. 2. Bury Road runs parallel to the High Road and forms the north-eastern boundary to the site; this is a schizophrenic street with low rised residential properties on its north-eastern side, including opposite the site, and larger scaled backs of shops and entrances to service yards on its south-eastern site, including this site as existing. The housing opposite was originally built as part of the Noel Park Estate by the "Artizans, labourers and Industrial Dwellings Company", a philanthropic housing company, in the late nineteenth century, in a distinctive, well designed and built decorative style that has lead the larger part of the estate to be designated a Conservation Area. However, some of those immediately opposite appear to be immediate post-war bomb damage two and three storey flatted block replacements, albeit in similar brick and slate pitched roofs. The 8-9 storey high 1970's Page High housing sits atop service yards and the Bury Road multi-storey car park at the northern end of the street. 3. The other sides of this application site, the south-eastern and north-western sides, are party wall boundaries to adjoining buildings. The whole north-western boundary adjoins no. 48-50, another large floorplate retail building, of two storeys height with a three storey High Road facade, occupied by "Peacocks" and (mostly) "Sainsbury's". Beyond Sainsbury's on the High Road frontage is a pair of late nineteenth century terraces, either side of Dovecote Avenue, a short "stub" of a street that terminates in the façade of the Page High/Bury Road Carpark building mentioned above; these two terraces were originally built as part of the Noel Park Estate mentioned above, with Dovecote Avenue continuing through to Bury Road, but this was severed by the construction of Page High/Bury Road Carpark. Beyond these is "Cheapside" a long and elaborately ornate late nineteenth century three storey retail parade; Page High/Bury Road Carpark extends along the back of both terraces. 4. The south-eastern boundary of the application site adjoins a pair of small retail buildings on the High Road frontage, nos. 42 & 42a, with two storeys of flats above. Beyond that is a "Brutalist" 1960s block containing a former BHS and a number of medium sized, two storey	

Stakeholder	Comments	Response
	retail units with blank bush-hammered concrete first floor facades. Beyond that and a couple more disparate smaller retail units, leading to Turnpike Lane underground station, at the crossroads formed by the meeting of Wood Green High Road, Westbury Avenue, Green Lanes and Turnpike Lane. 5. The opposite, south-western side of the High Road, is more consistent than this side, consisting of a mostly late nineteenth century, three storey, red brick retail parade, usually with flats above. The wider context is generally of low rise, two and three storey, red brick and slate pitched roofed terraced housing, but the High Road frontage and Wood Green Metropolitan Centre forms a focus of intensity, with several existing higher rise and larger floorplate buildings, such as the up-to-8 storey former Shopping City (now The Mall) and up to 12 storey office towers by Wood Green Station about 0.5km beyond to the north-west. **<u>Planning Policy Context</u>** 6. Wood Green, including the location of the site, is identified in the London Plan as a Metropolitan and is one of the Growth Areas identified in the Council's Local Plan 2013. 7. Haringey's Local Plan; Site Allocations Development Plan Document (DPD) contains detailed provisions on the Growth Area / Area of Intensification, and specific site allocations for a number of sites in the area, "Sites in Wood Green Metropolitan Centre", including this application site, which forms part of SA14: 16-54 Wood Green High Rd.. This has been further developed in the Wood Green Area Action Plan (AAP) DPD, which contains twelve AAP area wide policies and further site allocations including once again this application site, as WG SA14: 16-54 Wood Green High Rd.. The two documents are at different stages; the Site Allocations DPD has been adopted (July 2017); the Wood Green AAP was recently consulted for a second Preferred Options Consultation (February – March 2018); a report is currently being prepared. The Site Allocations DPD has the full weight of a recently adopted document, although the version in the emerging AAP is the most recently published site allocation and has some weight. 8. The adopted DPD Site Allocation SA14 reads:	

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	Comprehensive redevelopment of current High Road frontages for mixed use development consisting of town centre uses at ground and first floor level, with residential above, and a potential new CrossRail 2 station entrance onto Wood Green High Road. Site Requirements include an allocation site wide masterplan that also shows it does not compromise coordinated development of neighbouring sites, provide one or more "laneways" across the allocation site, heights and building lines that respond to context and the potential for a taller building beside Turnpike Lane station and ground and first floor town centre uses and a wider pavement along the High Road frontage. 9. The emerging AAP Site Allocation WG SA14 reads: *Comprehensive redevelopment of current buildings for mixed use development consisting of town centre uses at ground and first floor level, with residential and employment uses above.* The draft AAP introduces a requirement for new employment floorspace but is otherwise similar. 10. The Noel Park Conservation Area is nearby but not immediately adjacent to the application site; its significance and the impact of this proposal is dealt with by the Conservation Officer's report. The immediately adjacent housing on the opposite side of Bury Road and retail parade just up the High Road that were originally built as part of the Noel Park Estate are not part of the conservation area as they are detached by a former railway (the Palace Gates Line, closed in the 1960s) and other later developments. They do however form a significant part of the local context. 11. Ducketts Common is a large local park only a short walk from the application site, opposite Turnpike Lane Station, along the south-western side of Green Lanes, the southern continuation of the High Road. It contains sports and children's play facilities, café, seating, planting, grasslands and mature trees. There is also a children's playground at the north-eastern end of Whymark Avenue about 250m from the site. However the site lacks existing immediate doorstep play facilities. There are some street trees along both	

Stakeholder	Comments	Response
	The High Road and Bury Road but otherwise there is little local greenery in the setting of the site. **<u>Principal of Development & Masterplan</u>** 12. The principle of development with the uses proposed is established by the Site Allocations. 13. In accordance with those allocations, the applicants include a **Masterplan Approach [section "4.5" of their Design & Access Statement]** for the rest of the allocation site (that is the Sainsbury's etc. site to the north-east and the BHS etc. site plus smaller retail units to the south west of this application site). This shows how these proposals for this site can fit in with the actual real proposals for the neighbouring site to the south-east (the "BHS Site"), that a similar pattern of development to this proposal could successfully develop the rest of the Allocation Site to the north-west (the "Sainsbury's Site"). 14. The applicant's Design and Access Statement also explains how their masterplan has evolved in tandem with the masterplan for the "BHS Site", which has been going through its own pre-application process for much of the same time as this application. The architects of the two sites started with different approaches; this application a "podium" of similar height to existing surrounding heights, with blocks of greater height set back from the site edges, the BHS site with taller blocks along the street edges, as well as creating a new route through and public space within their site. Both contrasting approaches reasonable responses to contrasting site conditions within their respective sites, but that also both proposals have evolved, in a collaborative Masterplanning exercise, to accommodate their differences. 15. One difference is that the BHS Site will propose a "Laneway" crossing the site, in accordance with one of the site requirements of the Site Allocations, but that this application does not include a Laneway. The most obvious difference in site characteristics is that the BHS Site is over 2x as large as this site, so has more room to accommodate a Laneway. It is also important that the currently severed stump of Dovecote Avenue is repaired and somehow turned into a Laneway as part of either a development on the Page High/Bury Road Carpark site or by modifications to the existing building (possibly to open up parts of the undercrofts). The applicants for this application,	

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	and those of the BHS Site, have also shown that one Laneway (plus potentially Dovecote) would be sufficient to improve access to the Bury Road houses, and reduce their isolation. This application site has only just enough High Road frontage to provide a large retail frontage, suitable for one or two of the larger, modern retail units that the Metropolitan Centre needs, alongside a narrow residential entrance. The layout of the residential access within this proposal can be seen as a "proto-Laneway", but the site constraints make a full Laneway difficult in this site, and that the SA requirement can be considered to be satisfactorily delivered by neighbouring sites. 16. The other major difference in approach is between the two approaches is that between "podium-and-blocks" here and "taller-blocks-on-the-street" model on the BHS Site. I believe the podium & blocks model is more suited to this application site as it is important to respond to the established parapet line of the existing retail parades that should be retained in perpetuity, to the north-west of the site. The proposals for the BHS site respond to that line in their elevational treatment but propose continuing up to eight storeys on that building line. However the buildings to the north have not only a strong parapet line but also a strongly modelled roof, with gables, domed turrets and an elaborately decorated crowned pyramid (the latter two in the centre of the Cheapside block); it is therefore important that the upper floors of the proposal on this site pull away from the building line. 17. Towards the back of this proposal, the set-back block leaves a three storey residential elevation along Bury Road, creating a much better relationship to the houses opposite on Bury Road, whilst also relating in height to the set-back highest floors of Page High. The BHS Site proposals also would have a three storey street frontage to Bury Road, and the two applicants have used the cooperative Masterplanning process to align their height and building lines here. Only on their south-eastern and south-western (Whymark Avenue & the High Road) frontages, they propose taller blocks on the street frontage, and this is more appropriate on their site, where the Council have agreed that the southernmost end of the High Road, beside the tube station, could be an acceptable site for a tall (10 storeys and above) building. 18. Where the two sites meet on the High Road frontage, they are separated by a small retail unit, not part of any development and therefore likely to remain; this has a higher parapet	

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	line than proposed for this application site, so represents a modest attempt at transition between their two parapet height, but the main work of transition here is in the end flank elevation of the BHS Site proposals, which will be dealt with in that application. 19. Between the blocks, both sides propose podium landscaped courtyards, and a further fruit of the collaborative Masterplanning is that the designs of these have become complimentary, with the potential to connect between them, have complimentary landscaping and fenestration onto them, despite it not being possible to align their levels. **Pattern of Development & Streetscape Character** 20. As noted above, the pattern of development of the proposal can be described as a podium development with taller blocks rising out of that podium. A podium development contains a lower block that spreads widely towards the edges of the site with taller blocks sitting *on* the podium, well set back from all its edges. It is a well-established building form that helps permit taller buildings fit in with a lower rise context. The lower podium can enclose and contain street frontages, maintaining a lively and legible street pattern, whilst the podium level space around the taller buildings allows day and sunlight access, views and a greater sense of spaciousness to the taller housing. Wind downdraft and funnelling is kept above street level, avoiding harming pedestrian public spaces. 21. In particular in this proposal, the two main street frontages of the application site, whilst streets of very different character, are proposed to be both treated with what can be considered to be an appropriate, street friendly, pedestrian friendly and neighbour friendly manner. The High Road frontage is proposed to continue, indeed to reinforce, the strong retail parade frontage established by Cheapside, the short terraces either side of Dovecote Avenue and the longer terraces on the opposite side of the High Road, with a lofty retail ground floor, and two floors of residential above, albeit that the residential would be more screened, with the street elevation being formed of brick balustrades and screens to deep balconies to 1st and 2nd floor flats. 22. The more residential character of Bury Road would be repaired with this development, replacing the existing four storey, blocky, bland and relatively blank building on the site with an active residential frontage, with front gardens, residential front doors and a stepped	

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	two and three storey residential frontage. This will give active frontage and passive surveillance to this currently ill-overlooked section of street (directly opposite is a row as garages and the back of a flatted block), instead, extending the best character of the existing Bury Road, that of the surviving stretches of the Noel Park Estate, onto the other side of the street. It would also cunningly hide the ugly service elements of the development; the refuse stores, disabled and bicycle parking. 23. This application also includes provision to pay for the council to improve the public realm of Bury Road. The plan is that improvements to the entirety of Bury Road, from its junctions with Lymington Avenue to the north-west to its junction with Whymark Avenue to the south-east, would be jointly paid for by developments on the whole of the two site allocations, the one that this forms a part of and Bury Road Carpark/Page High, but would be delivered in phases as developments are completed. Improvements would include traffic calming, new surface materials, widened pavement, street trees and other soft landscaping 24. At the centre of the site, there would be a raised podium courtyard garden, with the main residential blocks facing across this garden on either street side, roughly parallel and of 18m minimum distance apart. This podium garden is at a floor lower than the too street frontages, so that all the residential accommodation (except the houses on the Bury Road frontage) have access to this as a communal garden. This courtyard garden extends to the south-eastern boundary, where, as mentioned above, it would be open to a similar podium garden in the current design for the BHS Site. On the north-east side it is separated from the site boundary with the "slot" down to the main residential access passageway, which therefore becomes open to the sky here and contains an external staircase to the courtyard garden. **<u>Overall Height, Tall Buildings, Impact on Views</u>** 25. This section considers the design of the taller elements that sit on the "podium". As mentioned above, the podium intrinsically resolves some of the most intractable problems of taller buildings; by removing the taller elements from the street frontage, a human scale and contextual relationship to neighbouring existing buildings is maintained in the streets and public spaces immediately next to the site, wind downdraft and funnelling is avoided	

Stakeholder	Comments	Response
	and daylight and sunlight access is enabled. 26. The height of the taller elements of this proposal itself falls just below the normal threshold of *tall buildings*, 10 floors; the highest elements are of 9 storeys. However the taller elements vary in height, with elements at nine, eight, seven and six storeys. This is enhanced in the modelling and elevational treatment of the lower floors of the higher blocks, with step backs and forwards, along with deep grooves between, to break up the higher elements into what would appear to be three or four separate adjacent blocks. This will give the taller elements an appealing sculptural form that breaks up the overall mass and apparent height and gives them an appealing proportion and modelling. Taller elements are also positioned where their impact will be least, away from street frontages. The images and renderings produced demonstrate that the taller elements would be less visible (often invisible) from immediately surrounding streets. 27. The application site falls within the identified viewing corridor of the Locally Significant View no. 21, from Downhills Park Road to Alexandra Palace. The applicants have successfully demonstrated in their Townscape and Visual Impact Assessment (TVIA) does not rise high enough to appear in this view; from the viewpoint the proposal would not be visible over the roofs of houses in the foreground, whilst Alexandra Palace would remain visible. 28. The TVIA also assesses a number of local views of the proposal, from local streets, as well as from Ducketts Common park and including from within the Noel Park Conservation Area. Many of these show the proposal would not be visible or only barely visible, obstructed by foreground buildings and trees. Close up views from Bury Road generally show the proposal would have a better or no worse impact than the existing building on the site. It is fair to say that the only viewpoints from which the proposal would have a significant impact are those from the High Road itself or from some places on the street that runs off the High Road directly opposite the site, Courcy Road. These views will honestly express the importance of the High Road. The height of the proposal will be visible, but will not be out of character with other buildings along the High Road; it will be of a comparable height to the long length of buildings around The Mall, and also of Page High. The plans for the BHS Site will also be of a similar height, and the council has	

Stakeholder	Comments	Response
	agreed that there could be a taller building beside Turnpike Lane. **<u>Elevational Treatment, Materials and Fenestration, including Balconies</u>** 29. The applicants' architects have chosen a brick based palette which is welcome as a durable appealing and contextual material. In particular, the two lower facades, facing right onto the High Road and Bury Road, are proposed to be in materials of rich, varied, red colours, tones and textures. The High Road elevation is characterised by a composition of horizontal banding and vertical piers, in contrast to the Bury Road elevation's composition of more solid planes of brick, with alternate panels of textured brick and a residential rhythm. Contrasting with both, the above-podium higher-rise elements are proposed in a lighter, greyer, more "washed-out" colour palette, in a more framed elevational composition also including vertical bands as well as floor to ceiling windows. 30. These three contrasting elevational composition and material strategies contain common elements to provide a unity across the proposal and tie into successful precedents from the surrounding areas. In particular, the red tones and varied textures of the High Road and Bury Road elevations to match and fit in with those of the better quality Victorian and Edwardian retail parades along the High Road and residential streets of Noel Park, whilst the greyer tones of the higher elements reference some of the alternate brick colours found in Noel Park, particularly the blue-grey glazed bricks. The textured brick of Bury Road references the chevron patterned gables of Noel Park, yet in a contemporary detail. The horizontal bands of both the High Road and higher elements, and the vertical bands of the higher elements, are both proposed to be in reconstituted stone, tinted to compliment the brick colour with which they are associated, and reference the rich pattern of banding and projecting parapets of Noel Park. 31. Fenestration and balconies are integrated into a tight coordinated system. At the lower levels, facing the High Road and Bury Road, balconies are wholly recessed to separate them as much as possible from the street. On the High Road, the lowest residential level, at "1st Floor" that is in reality comparable to a traditional 2nd floor level, above the double height retail units high enough to accommodate aa mezzanine floor and therefore above the roof of a double decker bus anyway, flats have continuous, deep, recessed balconies,	

Stakeholder	Comments	Response
	set behind a broad parapet interspersed with regularly spaced broad brick piers to give a significant amount of privacy and screening from the street, whilst the soffit is detailed to bring in extra higher level light, with a raised planting bed setting "2nd Floor" (podium level) balconies/roof terraces even further back and even more screened as the brick screen becomes one of narrower brick piers much more closely spaced. This is an impressive, coherent and sophisticated response to the issue of how residential accommodation can coexist close to a busy road and vibrant high street. 32. Private external amenity space for the houses on Bury Road is also well separated and screened from the street, despite the traditional solution of providing back gardens not being available due to the layout being that they back onto the "podium"; instead they have two-level roof terraces at their 2st and 2nd floor (that act as the mezzanine and 1st floor levels in the rest of the development). The 2st floor terrace would be very private, an internal courtyard only open to the sky, with light coming also from the 2nd floor terrace that also overlooks the street, albeit set behind a planting bed to provide some screening and privacy, and benefiting from sun for most of the day. These roof terraces also provide a way to bring daylight deep into the back of the ground floor living-dining–kitchen space, which would also have a generous patio door onto a small front garden, screened from the street by opportunities for planting, yet providing good passive surveillance. 33. Finally the higher floors benefit from generous levels of daylight due to large floor to ceiling windows. Balconies to either street side are always detailed as fully recessed, with openings in lieu of windows within the tartan gridded elevational pattern. Balconies are frequently placed at the corners, bringing in extra light and helping to avoid single aspect flats. Only on the "inside" elevations, onto the internal courtyard, are balconies projecting; here this allows residents to get longer oblique views "up" sand "down" the interior of the block, into and beyond the neighbouring blocks, benefiting also form longer access to sun. Privacy and screening is less of a concern as they would not be visible from the street, but the balustrade detail used throughout of deep vertical balusters, should further control visibility. **Residential Quality (flat, room & private amenity space shape, size and quality)**	

Stakeholder	Comments	Response
	34. All flat and room sizes comply with or exceed minima defined in the Nationally Described Space Standards, as is to be routinely expected. 35. Similarly, all residential units are provided with private amenity space in compliance with or batter than London Plan and Mayoral Housing SPG requirements. All flats would also be able to use a variety of private communal external amenity spaces; the large central courtyard incorporating children's playspace and quieter, sunlit roof terraces to each block. The houses on Bury Road would not access these but they have their own front doors off the street, front gardens and private, split-level roof terraces. 36. The alignment of the site is fortunate for developers, with the two bounding streets, Wood Green High Road and Bury Road, running at close to exactly 45˚ of due north. Therefore provided flats are aligned with or perpendicular to the street, they will not have a face close to due north facing. There are single aspect flats within the scheme but these are a small proportion of the total (none with purely north or purely south aspects). Those flats on the Bury Road side that are theoretical single aspect, three per floor on a typical floor, whilst the other three per floor have a corner and second aspect, have deep recessed balconies with a second living room window (as well as their bedroom window) onto this balcony, so the living room will get cross ventilation and varied daylight. Those single aspect flats facing into the courtyard all benefit from projecting balconies, allowing long north-west and south-east views, day and sunlight. 37. Thought has also been given to providing daylight, sunlight and fresh air to communal circulation space. The primary entrances from both the high Road and Bury Road are generous double height spaces that lead onto an open air courtyard space, connecting the two sides together and providing an outdoor stair to the central courtyard, as well as access to lifts and stairs to both blocks. At upper floors, all the corridors on the Bury Road block have windows at either end, providing very good daylight to circulation. This is not possible on the High Road block except on the top two floors, where it opens onto their roof terrace, but this is so the corridor can be shorter, to allow simpler fire protection. **Daylight, Sunlight and Privacy / Overlooking of Neighbours**	

Stakeholder	Comments	Response
	38. Of relevance to this section, Haringey policy in the DM DPD DM1 requires that: *"…D Development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours. The council will support proposals that:* *a. Provide appropriate sunlight, daylight and open aspects (including private amenity spaces where required) to all parts of the development and adjacent buildings and land;* *b. Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and residents of the development…"* 39. The applicants provided Daylight and Sunlight Report on their proposals and of the effect of their proposals on neighbouring dwellings. These have been prepared broadly in accordance with council policy following the methods explained in the Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (2nd Edition, Littlefair, 2011) , known as "The BRE Guide". 40. The assessment finds that the impact of the development on existing neighbouring residential properties is remarkably and impressively favourable, with virtually no noticeable detrimental effects on windows. In particular, the assessment finds one window in 42a High Road (immediate neighbour to the south-west) would marginally noticeable loss of daylight from the *cumulative impact* of both this proposal and that on the BHS Site (not from this development alone) to 0.7x its current levels, which considering the amount of development envisaged is a very acceptable outcome. Three rooms at no 55 would be the only ones affected of the properties opposite, and whilst they would experience a noticeable loss of No Sky Contour (NSC), but would retain adequate Vertical Sky Component (VSC) which makes the effect acceptable; in the cumulative assessment 4 additional rooms also get the same result. No other neighbouring properties are found to have noticeable detrimental loss of daylight and no noticeable detrimental loss of sunlight to neighbouring properties have been found.	

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	41. Daylight and sunlight levels to the proposed residential accommodation within this proposal generally meet the BRE standard, a surprisingly good result for a higher density scheme. In particular, only two of 319 rooms do not meet the BRE daylight standard, with 4 more in the cumulative assessment; 99% & 98% respectively. The two are both secondary bedrooms. The additional four living rooms situated below balconies where that could be mitigated if the balcony design could be modified at the detailed design stage. Ten of 39 living rooms (25%) fail to meet the BRE sunlight standard, but nine of those only fail on the total standard but only marginally, and meet the winter target; in all cases it may be possible to mitigate the performance in detailed design of balcony positions. All those flats would also benefit from access to external amenity space receiving good levels of sunlight. 42. Good levels of sunlight access to the proposed amenity spaces, in full compliance with the standards of the BRE Guide, is found. 43. Normally in the case of higher density developments it is necessary to note that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London, the Mayor of London's Housing SPG acknowledges. In particular, the 27% VSC recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Therefore it is normally explained that full or near full compliance with the BRE Guide is not to be expected. However in this case, the proposals, even when cumulative impact of those with the neighbouring BHS Site are taken into account, *do achieve* near full compliance with the BRE Guide. This proposal therefore achieved a high quality of day and sunlight access. 44. There are no concerns with overlooking and privacy with respect to neighbouring dwellings as at present there are none close enough to be affected. **Conclusions**	

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	45. This proposal is a well-designed redevelopment of an important part of an allocated site within the Wood Green Metropolitan Centre. The proposals would provide better quality, modern retail units in this important primary frontage and to an architectural design that would repair an important part of the High Road frontage comparable to the high quality Victorian and Edwardian retail parades nearby. 46. Above this it would provide a significant amount of good quality new housing, designed to compliant space and amenity standards, notably including no north or south facing single aspect flats, very high daylight and sunlight levels for a higher density scheme, designed to appear as a sculptural cluster, well set back from street frontages, and despite being a taller building, having no detrimental impact on local views and microclimate. The proposals also include new townhouses fronting Bury Road, providing well designed new family sized affordable housing with private amenity space and reinstating a calm, convivial residential character to this section of this street. Finally, these proposals have been masterplanned and engaged in collaborative design with immediate neighbours to ensure it would complement and be coordinated with future developments, as part of improvements to Wood Green as a vibrant town centre that people can live, work and shop in safely, comfortably and amidst architectural delight.	
Principal Conservation Officer	Assessment of significance: The site does not contain any Listed or Locally Listed Buildings, and is not within a conservation area. Given the scale of the proposed development, it is appropriate to consider the impact it would have on the following nearby heritage assets and their settings: • Noel Park Conservation Area is located to the north east of the site. It is a late Victorian planned housing estate comprising residential streets of terraced houses of generally modest scale, a school, community hall, and St Mark's Church. The church and adjacent hall are Listed at Grade II. The proposed development would not be visible from most of the conservation area, but would be visible in some views from south-west of the	Comments noted.

Stakeholder	Comments	Response
	conservation area (nearest to the site). It would also be visible in some views of St Mark's church, which is located at the south-west corner of the conservation area. • Cheapside parade (on the High Road to the north of the site) and the Victorian houses on Bury Road and Westbeech Road (to the east of the site) were originally part of the Noel Park estate and have some heritage interest. However, these are not designated heritage assets and are not identified on the Council's Local List as having sufficient heritage interest to warrant consideration in the planning process. These buildings do contribute to the setting of the conservation area. Both are separated from the conservation area by later development and there are no direct visual connections, but they do have historical and aesthetic connections with the conservation area and contribute to our appreciation of the history of the estate and its connections to the surrounding area. • Turnpike Lane underground station (Grade II Listed) and bus station (Locally Listed), and Gaumont Cinema (Grade II* Listed) are located on the High Road at some distance from the site. The proposed development may be visible in views of and from these buildings, and it is appropriate to consider whether there would be an adverse impact on their settings. • There is potential for the development to have an impact on the strategic view (identified in the London Plan) from Alexandra Palace towards Central London and St Paul's, which could affect the setting Grade II Listed Alexandra Palace, and Grade I Listed St Paul's Cathedral. The proposed building could also affect the view of Alexandra Palace from Downhill Park Road, which is one of Haringey's locally significant views (identified in the Borough's Local Plan). Comments on proposals: The applicants have identified key viewpoints in consultation with the Council. The impacts of the proposed development on those viewpoints is analysed in their Townscape and Views Impact Assessment. I agree that the identified viewpoint from Noel Park Conservation Area	

Stakeholder	Comments	Response
	(view 13, adjacent to St Mark's Church) is the most likely to be adversely affected. The development would be visible from this viewpoint in behind foreground buildings, but would not be particularly prominent, and would appear similar in scale to existing High Rd buildings that form part of the view. Any adverse impact on the setting of the conservation area or St Mark's Church would be negligible. The development would have considerable visual impact on both the High Rd and Bury Rd, affecting Cheapside Parade and the Victorian houses on Bury Rd. The proposed building would be considerably higher than much of the surrounding context and would not be in keeping with the scale of the historic buildings. However, the higher parts of the building are set back so that both street frontages are in keeping with the existing street context. The design of the proposed building at street level responds to the character, materials and proportions of the Noel Park Estate. The proposed design would be an improvement over the existing frontages. This is particularly true of Bury Rd, as the existing building frontage is out of scale and detracts from the street scene. I also note that there are a number of existing buildings in the area that are out of scale – most notably Shopping City. Any adverse impact on the street scene would be largely outweighed by the benefits of the proposed design. There would be no direct impact on either Cheapside Parade or the Bury Rd houses that would affect their historical connection with the Noel Park estate. The views analysis indicates that the proposed building would not be visible in the locally identified view of Alexandra Palace from Downhill Park. The building would be visible in wide views from Alexandra Palace, but it would not appear out of scale with surrounding buildings, or be particularly noticeable. The location offers panoramic views of the area in which buildings of various types and scales are visible. There would be no adverse impact on the view, or the setting of Alexandra Palace. The new building would sit outside of the specific view corridor identified in the London Plan, and so would not affect the setting of St Paul's. The views analysis indicates that the proposed development would be visible in views of Turnpike Lane station, and would be noticeably larger than the existing building on the site. However, any adverse impact on the setting of the station would be negligible. It is some	

Stakeholder	Comments	Response
	distance from the development site. The wider streetscape is already quite mixed, and the proposed building would not appear incongruous. The setting of the Gaumont Cinema would not be affected. Conclusions: The proposed development would not cause any adverse impacts on the significance of the heritage assets identified above. It would preserve the identified Listed Buildings and their settings, and the character and appearance of the Noel Park Conservation Area. Recommendations: There is no objection to the proposed development on conservation grounds. Details of the external materials to be used in the development should be secured by condition.	
Transportation	**Proposal** The proposal entails the demolition of the existing building and erection of buildings of 3-9 story's in height to provide residential accommodation (Use Class C3) of 128 units and 1,582sqm of flexible retail use (Use Classes A1/ A2/ A3/ A4/ A5) plus associated site access, car and cycle parking, landscaping works and ancillary development. **Site Location and Context** The development site is located at 44 and 46 High Road, formerly occupied by Marks and Spencer. The site has frontages on both High Road Wood Green and Bury Road. High Road is a busy classified road, with high volumes of traffic and accommodates several bus routes. High Road is characterised by relatively wide footways and includes several pedestrian crossings positioned along its length. In contrast to High Road, Bury Road is a back street and is not a very welcoming environment for pedestrians and cyclists, the reason being that it is not a destination on its own right, and is lacking in pedestrian crossing facilities and cycle facilities. It is noted that there is an existing raised table located at the northern end of the Bury road, which	Observations have been taken into account. The recommended legal agreement clauses, conditions and informatives will be included with any grant of planning permission as

Stakeholder	Comments	Response
	facilitates pedestrian movements. In terms of the parking situation, the adjoining streets are included within the 'Wood Green Inner Zone' controlled parking zone (CPZ) with parking controls operating Monday to Sunday 8AM to 10PM. The site has good access by rail/ underground and bus. It is served by 13 bus routes (230, 444, 231, 217, 67, 184, 221, W4, 123, 141, 29, 41 and 144) with very good frequencies. The rail/ underground service in close proximity consists of London Underground Piccadilly Line services, running through Turnpike Lane station. Consequently, the site achieves a public transport accessibility level (PTAL) of 6a (with 0 being the worst and 6b being the best). The PTAL rates amongst the highest in London and is considered as 'excellent'. **Policy Context** Policy 6.13, of the London Plan sets out 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 on the map 2.2, as part of the outer London. 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. 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. With regards to employment land uses, addendum necessitates that disable car parking provision is provided for disabled employee, and provision for disabled visitors.	appropriate.

Stakeholder	Comments	Response
	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. 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 DM 32 on parking standards, part of the London Borough of Haringey Development Management DPD- January 2016, indicates that London Plan policies are valid when planning proposals are assessed. PolicyT6 Car parking of the emerging draft London Plan, indicates that car-free is the starting point for all developments, which are (or planned to be) well connected. Table 10.3 has the maximum parking standards based on location and PTAL score, for Outer London (PTAL4) Opportunity Areas the maximum parking provision is 0.5 parking spaces per unit. **Trip Generation and Impacts** The principles and methodologies for assessment the residual highway and transportation impacts of the development is considered to be acceptable. The TRICS sites used to derive the trips rates for calculation the trip generation of the proposed development were approved by the Council. The baseline trip generation of the site found a person trip generation of 1,485 and 1,290 two-way trips in the AM and PM peaks respectively. In terms of vehicles trips, the baseline trip generation calculations shows that the existing site generates a total of 94 two-way vehicle trips (71 arrivals and 24 departures) and 183 two-way vehicle trips (57 arrivals and 126 departures) in the AM and PM peak periods. The table below shows how the existing development trips break down. The baseline trip generation calculations shows a high volume of trips by public transport and walking.	

Stakeholder	Comments	Response
	Table 1: Existing Trip Generation	

Mode	AM Peak (0800 – 0900)			PM Peak (1700 – 1800)			Daily (0700 – 2200)		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way	Arrive	Depart	Two-way
Vehicles	71	24	94	57	126	183	1,172	1,182	2,353
Bus	498	339	836	558	700	1,257	7,682	7,702	15,384
National Rail/ London Underground	1,017	468	1485	506	784	1290	9122	7859	16981
Bicycle	37	21	59	37	41	78	442	437	879
Walk	607	1301	1908	1816	1156	2972	19071	20554	39626
OGVs	0	0	0	0	0	0	9	8	17
Total	**2,241**	**2,159**	**4,400**	**2,983**	**2,819**	**58,02**	**37,652**	**37,950**	**75,602**

The proposed trip generation for the development, which includes both the retail and residential trip generation are presented below in Table 2. The predicted trip generation for vehicles are 21 two-way trips and 36 two-way trips in the AM and PM peak periods respectively.

Table 2: Proposed Development Trip Generation

Mode	AM Peak (0800 – 0900)			PM Peak (1700 – 1800)			Daily (0700 – 2200)		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way	Arrive	Depart	Two-way
Vehicles	14	8	21	12	24	36	269	275	543
Bus	92	71	163	111	130	241	1464	1468	2931
National Rail/ London Underground	192	114	306	110	147	257	1768	1532	3303
Bicycle	7	12	19	11	8	18	96	97	191
Walk	116	258	374	345	222	569	3620	3903	7523

Stakeholder	Comments	Response

OGVs	0	0	0	0	0	0	5	5	8
Total	**424**	**467**	**890**	**591**	**534**	**1125**	**7250**	**7325**	**14573**

In terms of the net trip generation (comparison of the existing with the proposed) the assessment finds a reduction in trips across all modes. With respect to the highway network, the proposal will generate fewer vehicle trips in the order of 73 two-way and 102 two-way trips in the AM and PM peak periods respectively. Additionally, the assessment shows a considerable reduction in public transport trips and indicate that the proposal will have a positive impact.

Table 3: Proposed Development Net Trip Generation

Mode	**AM Peak (0800 – 0900)**			**PM Peak (1700 – 1800)**			**Daily (0700 – 2200)**		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way	Arrive	Depart	Two-way
Vehicles	-57	-16	-73	-45	-102	-147	-903	-907	-1810
Bus	-306	-225	-531	-448	-553	-1001	-5,914	-6,170	-12084
National Rail/ London Underground	-925	-397	-1322	-395	-654	-1049	-7658	-6391	-14049
Bicycle	-30	-9	-39	-26	-33	-59	-346	-340	-686
Total	**-1318**	**-647**	**-1965**	**-914**	**-1342**	**-2256**	**-14823**	**-13808**	**-28631**

Pedestrian/cycle and public realm environment
The development is proximate to three (3) local cycle routes consisting of routes 54, 79 and 56. The Council's aspiration is to improve the cycle environment in Wood Green, in support of the anticipated intensification of Wood Green, as set out in the Wood Green Area Action Plan. Improve cycle and pedestrian routes and linkages within the Wood Green area is a key transport priority.

Stakeholder	Comments	Response
	The Council is seeking to develop a shared surface scheme for Bury Road, in line with its objectives to enhance the public realm and provide improve pedestrian routes and cycle route linkages through Wood Green. A concept design is in development but improvements on Bury Road, under this proposal, will focus along the section fronting the site. The Council will be looking to deliver a standalone scheme for Bury Road but will develop the detailed design for a scheme encompassing the entire length of Bury Road. Such a scheme for Bury Road will be delivered in phases, depending on the timing of developments that would fund the scheme. **Access arrangements** The pedestrian accesses for the commercial use is from the High Road, whereas access for the residential component of the development is a split between the High Road and Bury Road. The Council has identified the need for Modifications to the public highways to enable this proposal. Those modifications consists of the removal of the redundant vehicle crossover and reinstatement of footway and creation of a new vehicle crossover in Bury Road. These highway modifications will be secured and implemented as part of the highway improvements work to be secured through a Section 278 agreement. It should be noted that the applicant will need to commission a road safety audit on the final design of a highway scheme for Bury Road. Further changes in Bury Road include amendments to the existing on-street parking, in order to enable the development. Accordingly, the existing traffic management order (TMO) will be amended. **Car parking provision** The proposal includes a total of 7 accessible car parking spaces on-site. All spaces are for the residential part of this development, leaving other land uses with no dedicated parking spaces. The car parking provision for the family size units are below the car parking provision required to support the Councils Development Management DMPD which require all three plus bed units to have access to an off street car parking space. However we have considered that, given the site has a good public transport accessibility level an enhance car club membership should be provided for the three plus bed units. Provided this is secured as part of the S.106 agreement, we have considered that the car parking provision proposed is acceptable as the area	

Stakeholder	Comments	Response
	surrounding the site is located in the Wood Green Control Parking Zone and has not been identified as an area currently suffering from high on street car parking pressures. We have also considered that the sites has good public transport accessibility level. This is in line with the Council's Local Plan Policy SP7: Transport, which focuses on promoting travel by sustainable modes of transport, maximum car parking standards and car free developments. Car free developments are further supported by Haringey Development Management DPD, Policy DM32 which support car-free development where: a) There are alternative and accessible means of transport available; b) Public transport is good; and c) A controlled parking zone exists or will be provided prior to occupation of the development This development proposal will be dedicated as a car free/ car-capped development the Council will prohibit the issuing of car parking permits to the future occupiers of the residential element of this development in any current or future control parking zone, residents will be eligible for visitors parking permits. In accordance with Policy 3.8, the proposed development should include a total of **13** residential units which are 'wheelchair accessible' at the point of construction, or easily adaptable afters. It has been accepted that not all of the 10% units included, will be wheelchair accessible residential units at the start of occupation, or at all times. Therefore, the percentage (%) of the wheelchair accessible units is subject to demand, and is likely to be varied over time. The 'Housing Supplementary Planning Guidance', (March 2016)-London Plan 2016 Implementation Framework, sets up standards and indicating that each designated wheelchair accessible unit, should have a car parking space. To comply with the guidance above, if all assigned wheelchair accessible units are in use, parking provision for this proposal should be a total of 13 spaces. Nevertheless, 3 additional car parking spaces for disabled users are planned to be included on the public highway, and located along Bury Road. Those spaces will not be allocated to residents of this development, but can be used by other Blue badge holders. These additional on-street disabled car parking spaces will be included within the design and scope of	

Stakeholder	Comments	Response
	the highway scheme for Bury Road, which will be the subject of a Section 278 agreement. Considering that not all disabled users who are residing in the wheelchair accessible units will have cars, it is accepted that there is no need for each unit to have an initial allocated car parking space, at all times, because the demand for parking spaces is expected to change over time, we will therefore require and obligation of the developer to submit a parking management plan. In addition as the development is a car free development it is not expected that the car parking demand generated by the development will overspill on- street, thus it is not expected to increase on street car parking stress on Bury Road. There are some roads to the south and east of the site which are subjected to lesser parking controls hours than the Wood Green Inner CPZ and may suffer from some residual car parking pressures, to that end we will be request that the developer contributes a sum of £15,000 (fifteen thousand pounds) towards the design and consultation on parking control measure in these locations. The Council would generally require the provision of an adequate number of disabled parking spaces for non-residential use. However, we noted that the site has constraints that would preclude such provisions. Furthermore, the occupiers of the commercial uses are not known at this time. It is therefore recommended that the applicant produces a Car Parking Management Plan (CPMP) for the site, detailing how parking will be allocated for the proposed uses, management of the car park and other appropriate provisions relating to the use of the proposed car parking. Additionally, the development must include Electric Vehicle Charging Points (EVCP) in accordance with London Plan requirements – a minimum of 20% active and 20% passive EV charging points from the outset. **Cycle Parking** This proposal includes a total of 223 cycle parking spaces. Out of total, 9 are allocated for the commercial uses contained in this proposal, and the rest are assigned for residential use, split	

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	as: 192 for residential use (180 spaces for flats which are located at the first floor; 12 Mews Houses at the ground floor), and 22 short stay spaces located on the High Street. 5% of the total spaces are proposed to accommodate larger cycles. Cycle parking standards for new developments are set out within the London Plan. The proposed provision is above the minimum requirements. Thus, cycle parking provision is acceptable. The locations of the proposed cycle parking spaces are shown on the submitted drawing however there are some issues with spaces proposed to be placed on the public highway, i.e. how easy is to get to and use the proposed cycle parking spaces. It is therefore recommended that the applicant submit further details of the type of parking proposed and details on how these spaces will be accessed. **Refuse/recycling** Refuse and recycling for the commercial units is proposed to be undertaken using the High Road. Further details are required on the proposed timings when this operation takes place. For limited number of pick-ups (frequency), this will be supported, however further details that presents the trip generation for refuse vehicle is requested. Recommendations are to avoid AM peaks, in the interest of minimising traffic impacts along High Road. For the residential element of this proposal collection for refuse and recycling is proposed to be done via Bury Road. Further details are required on: pick-up point and frequency of collections. The proposed includes a statement saying that the management company will bring the bins to the kerbside. However, due to the amount of bins required the Council will need to be convinced that this is workable solution, this must be included in the service and deliver plan. **Delivery and Servicing Plan** Details of some information related to delivery and servicing was included on the TA. The commercial units are proposed to be serviced and take deliveries, from the High Road. The	

Stakeholder	Comments	Response
	timing of this operation must be controlled at all times. In addition, at mezzanine level above the parking spaces would provide the commercial units with a dedicated plant area. Details such as, how deliveries/servicing are planned once the development is occupied and required. Matters such as: access to parts of the site to enable servicing, for deliveries; measures to encourage better coordination with suppliers, aiming to make fewer trips, servicing bays, ongoing management and monitoring of deliveries (trips per day), there are details which are required, and will be dealt with. A condition requiring the submission of a detailed DSP is recommended. **Construction Logistic Plan (CLP)** The 'Construction Logistics Plan' (CLP), is recommended to be secured by pre-commencement condition. The applicant can refer to the TfL's guidance document through this link when compiling this document. TfL has expressed opinion that they should be consulted upon submission of the final CLP. The applicant/ Developer is required to submit a Construction Management Plan (CMP) and Construction Logistics Plan (CLP) for the local authority's approval 3 months (three months) prior to construction work commencing on site. The Plans should provide details on how construction work (Inc. demolition) would be undertaken in a manner that disruption to traffic and pedestrians on Bury Road, the High Road, and the roads surrounding the site is minimised. It is also requested that construction vehicle movements should be carefully planned and coordinated to avoid the AM and PM peak periods, the plans must take into consideration other site that are being developed locally and were possible coordinate movements to and implement also measures to safeguard and maintain the operation of the local highway network. Given the sensitivity of this location the CMP will require monitoring. The developer will be required to pay £3,000 (there thousand pounds) per year towards monitoring of the CMP.	

Stakeholder	Comments	Response
	Travel Plans The Council welcomes the submission of a Framework Travel Plan (TP) for residential part of this development was included. The document is consistent with the content of a standard travel plan, but will need to include the final targets and measures appropriate for the development. Therefore a detailed Residential Travel Plan will need to be submitted to the Council for approval in writing, within six (6) months of first occupation of the development. There is a lack of information on other land uses included in this proposal, a Travel Plan for the non-residential use will need to be submitted to the Council for its approval in writing. On assessing this application, we have concluded that subject to the following S.106 obligation and conditions the transportation planning and highways authority would not object to this application 1. <u>Car-free Development</u> The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as "car free" and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose. 2. <u>Travel Plan (Residential)</u> Within six (6) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses shall have been submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring and review to be agreed in writing by the Local Planning Authority, we will require the flowing measure to be included as part of the travel plan in order to maximise the use of public	

Stakeholder	Comments	Response
	transport: a) The developer must appointment of a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years. b) Provision of welcome induction packs containing public transport and cycling/walking information like available bus/rail/tube services, map and time-tables, to every new resident. c) Establishment or operate a car club scheme, which includes the provision of 2 car club bays and two cars with, two years' free membership for all residents and £50.00 (fifty pounds in credit) per year for the first 2 years. And enhanced car club membership for the family sized units (3 plus bed units) including 3 years membership £100 (one hundred pounds) per year from membership for 3 years. d) We will also like to see Travel Information Terminals erected at strategic points within the development, which provides real time travel information e) the travel plan must include specific measured to achieve the 8% cycle mode share by the 5th year. f) The applicants are required to pay a sum of, £2,000 (two thousand pounds) per year per travel plan for monitoring of the travel plan initiatives. Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements. 3. A Work Place travel plan must be secured by the S.106 agreement. As part of the travel plan, the following measures must be included in order to maximise the use of public transport. a) The applicant submits a Works place Travel Plan for the commercial aspect of the Development and appoints a travel plan coordinator who must work in collaboration with the Facility Management Team to monitor the travel plan initiatives annually for a period of 5 years and must include the following measures: a) Provision of welcome residential induction packs containing public transport and cycling/walking information, available bus/rail/tube services, map and timetables to all new	

Stakeholder	Comments	Response
	residents, travel pack to be approved by the Councils transportation planning team. c) The applicant will be required to provide, showers lockers and changing room facility for the work place element of the development. d) The developer is required to pay a sum of £2,000 (two thousand pounds) per year per travel plan for monitoring of the travel plan for a period of 5 years. This must be secured by S.106 agreement. Reason: To promote travel by sustainable modes of transport in line with the London Plan and the Council's Local Plan SP7 and the Development Management DMPD Policy DM 32. 4. <u>Control Parking Zone consultation CPZ</u> The applicant developer will require to contribute byway of a Section 106 agreement a sum of £15,000 (Fifteen thousand pounds) towards the design and consultation on the implementing parking management measures to the south and east of the site, which may suffer from displaced parking as a result of residual parking generated by the development proposal. Reason: To mitigate the impact of the residual parking demand generated by the proposed development on existing residents on the roads to the south east of the site. Reason: To ensure that any residual car parking demand generated by the development proposal will not have any adverse impact on the local highway network and the residential amenity of the existing local residents. 5. <u>Section 278 Highway Act 1980</u> The owner shall be required to enter into agreement with the Highway Authority under Section 278 of the Highways Act to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements. Unavoidable works required to be undertaken by Statutory Services will not be included in the Highway Works Estimate or Payment. In addition, the cost estimate is based on current highways rates of the permanent highways scheme. The developer will be required to provide	

Stakeholder	Comments	Response
	details of any temporary highways scheme required to enable the occupation of each phase of the development, which will have to be costed and implemented independently of this cost estimate. The cost of the S.278 works have been estimated at £313,055 (three hundred and thirteen thousand and fifty five pounds) and must be indexed linked and reviewed annually or before the implementation of each phase of the highway works. Reason: To implement the proposed highways works to facilitate future access to the development site. 6. <u>Construction Management Plan.</u> The applicant/ Developer is required to submit a Construction Management Plan (CMP) and Construction Logistics Plan (CLP) for the local authority's approval 3 months (three months) prior to construction work commencing on site. The Plans should provide details on how construction work (Inc. demolition) would be undertaken in a manner that disruption to traffic and pedestrians on the High Road, Bury Road and the roads surrounding the site is minimised. It is also requested that construction vehicle movements should be carefully planned and coordinated to avoid the AM and PM peak periods, the plans must take into consideration other site that are being developed locally and were possible coordinate movements to and implement also measures to safeguard and maintain the operation of the local highway network. Give the sensitivity of this location combined with the other developments proposed in the local are the CMP will require monitoring the developer will be require to pay £3,000 (three thousand pounds) per year toward the monitoring of the CMP. Reason: to ensure that the impacts of the development proposal on the local highways network are minimised during construction, and to coordinate construction activities in key regeneration areas which will have increased construction activities.	

Stakeholder	Comments	Response
	7. Parking Management Plan The applicant will be required to provide a Parking Management Plan which must include details on the allocation and management of the on-site car parking spaces including the wheel chair accessible car parking spaces to the front of the building and the 5 commercial car parking spaces. The residential car parking spaces must be allocated in order of the following priorities regardless of tenure (Private/ affordable): 1. Parking for the disable residential units 10% of the total number of units proposed (10/13)- wheel chair accessible car parking spaces) 2. A minimum of 1-wheel chair accessible car parking space for the commercial element of the development. 3. Family sized units 3+ bed units 4. Two bed 4 four person units 5. Two bed units 6. One-bed and studios units. Reason: To ensure that the allocation of the off street car parking spaces is in line with the Council's development management DMPD Policy DM 32 which seeks to priorities parking to family sized units. **Conditions:** 1. Cycle parking Design and Layout The applicant will be required to provide accessible cycle parking space in line with the Local Cycle design standard including details of how residents/staff will gain access to the cycle parking areas, and maintenance arrangements of the areas reserved for cycle parking 5% of all cycle parking spaces must be able to accommodate larger cycles. Cycle parking spaces must be available before the occupation, with all spaces retained thereafter.	

Stakeholder	Comments	Response
	Reason: To promote travel by sustainable modes of transport and to comply with the London Cycle Design Standard. 2. <u>Electric Charging Points</u> The applicant will be required to provide a total of 20% of the total number of car parking spaces with active electric charging points, with a further 20% passive provision for future conversion. Reason: To comply with the Further Alteration to the London Plan and the London, and reduce carbon emission in line with the Council's Local Plan Policy SP4. 3. <u>Delivery and Servicing Plan and Waste Management Plan.</u> The owner shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The service and deliver plan must also include a waste management plan which includes details of how refuse is to be collected from the site, the plan should be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying distances of a refuse truck on a waste collection day. Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway.	
Financial Viability Consultant	We have undertaken an assessment of the proposed Development with 9.1% affordable housing by units (6 x three bedroom mews houses) as offered by the Applicant. Taking into account the recommended amendments stated within paragraph 5.2 of this report, we have concluded that the proposed Development with the offer proposed by the Applicant of	Comments noted. Additional affordable

Stakeholder	Comments	Response
	9.1% affordable housing generates a deficit of £1,493,750 is in comparison to the deficit of £6,556,000 concluded in the Savills appraisal. For the reasons identified in paragraph 5.3 we recommend the Council include a review mechanism within the Section 106 Agreement.	housing has been requested and provided.
Housing	Affordable Housing Provision 1.1 The proposed development comprises of 121 residential units. The applicant has proposed to deliver a mixed used development with 25% affordable housing 6 mews houses (5x4 and 1x3) London Affordable Rent and 16 London Living Rent (6x1b, 4x2b and 6x3beds) total of 22 units 78 habitable rooms . This level of affordable units will contribute to Haringey's Strategic Policies of 40% Borough wide target. 1.2 Further, this does not comply with the adopted London Plan strategic policy 3A.10 which seeks the maximum amount of affordable housing. 1.3 The scheme is below our desired affordable housing requirement and subject to viability considerations as set in the Local Plan and NPPF. 2. Dwelling mix and Tenure 2.1 The Council will seek 40% affordable housing, includes 60% Social Rent/London Affordable Rent mix-11% 1beds, 45% 2beds, 33% 3beds and 11% 4beds and 40% intermediate housing- Intermediate rent at London Living Rent levels, mix 30% 1 beds, 60%2beds, 10% 3beds. 2.2 This site sits within the Wood Green AAP (emerging policy) this is a	Comments noted.

Stakeholder	Comments	Response
	designated growth Area & potential Opportunity area with levels of increased density. policy requires a suitable mix of tenures and unit size to be provided that are genuinely affordable. A portfolio approach is to be adopted within the AAP to ensure that any reduction in the percentage of family size units in the Town Centre locations should be offset by increased family units in other specified site locations. This actively ensures overall dwelling mix targets are met. 2.3 The council requires 10% of new residential developments to be fully wheelchair accessible to ensure housing choice for disabled residents. 2.4 The applicant will need to have regards to the benchmark rent levels as set out in in the Mayor's affordable homes programme 2016-2021 funding guidance. Active consideration should be given to including the London Affordable Rent (LAR) and London Living Rent (LLR) this will be based on 1/3 of the ward median. 2.5 The applicant will need to give careful attention to the new Intermediate Housing Policy adopted February 2018 3. Consultation 3.1 Negotiations for the transfer of the affordable housing units must take place with Council in the first instance where agreement cannot be reached, then units to be transferred to a preferred partner agreed by both the developer and the Council.	

Stakeholder	Comments	Response
	3.2 The Affordable Housing units to be transferred at the values stated in the viability assessment dated June 2018 that is £128 psf for the affordable rent, the value of the intermediate units has not been provided . CONCLUSION: A viability assessment has been undertaken and accepted that 9.1% affordable housing by units is delivered on this site. The applicant's has increase their original offer from 9.1% to 25% affordable housing by habitual rooms. This level of affordable housing is accepted provided the above tenure is delivered on site.	
Drainage Engineer	We have now reviewed the drainage strategy for 44 – 46 High Road, Wood Green. We can confirm our initial queries have now been addressed and this revised surface water drainage strategy meets Haringey's criteria, the LLFA, are satisfied that this application can proceed to the next stage.	Comments noted, condition attached.
Carbon Management	**Energy** Overall the scheme delivers an on-site carbon reduction of 35% against Building Regulations 2013. The energy efficiency measures that are to be installed on development will save 2% of the total carbon emissions. Savings from the community heating and hot water systems (CHP) are 28%. Carbon savings from renewable technologies (Solar PV) is 8%.	Comments noted, conditions and legal agreement clauses attached.

Stakeholder	Comments	Response
	This means that the development gives a saving of 35% against Building Regulations 2013 on regulated energy. In line with Policy 5.2 of the London Plan the remaining 65% will be offset. They have offered this value of the offsetting at £245,880. These measures, including the site wide energy network, makes the scheme policy compliant and should be secured through conditions and legal agreement. The Council believe that the number of residential units does not warrant a CHP system. And is at risk of putting future residents in economic disadvantage. The developer should reassess the need of implementing one as high operational costs could leave some residents in fuel poverty. **Suggesting Condition (1)** You must deliver the Energy standards as set out in Energy and Sustainability Statement, by Silcock Dawson and Partners Energy & Sustainability Design Group, dated April 2018. The development shall be constructed in strict accordance of the details so approved, and shall achieve the agreed carbon reduction of 35% reduction beyond BR 2013. This shall include: - The U-values as set out in 4.1.1. and 4.2.1. of the Energy and Sustainability Statement; - A 37 kWp solar PV installation of mono-crystalline PV panels. Covering at least 232 m^2 of flat roof area to accommodate the estimated PV capacity. The equipment and materials to deliver this standard shall then be maintained as such thereafter.	

Stakeholder	Comments	Response
	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. 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. Should the agreed target not be able to be achieved on site through energy measures as set out in the afore mentioned strategy, then any shortfall should be offset at the cost of £4,000 in total (per tonne of carbon for 30 years) or by delivering a solar PV installation on a nearby school. **Reason:** To comply with London Plan Policy 5.2. and Local Plan Policy SP:04. **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: a) Confirmation that the heat network serves all domestic and non-domestic units on the site. Providing all hot water and space heating loads. b) 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; and c) 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	

Stakeholder	Comments	Response
	then be continued for the life of the heating and hot water network on the site, unless a regulatory scheme takes its place. **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. **Suggested Condition (3)** **Overheating Risk in Dwellings** There is risk of overheating in new development, and on this mixed-use development (with sources of noise and air quality) may mean that and simple passive cooling (opening the windows) may not be a viable option. The applicant will need undertake a London weather pattern dynamic thermal model using future weather patterns (2050 medium emissions scenario). They will need to pick most likely to overheat units (south-west corner) to model. If the units do overheat, design measures and technologies should be installed to minimise this risk (such as Brise soleil). If they only overheat in the future, a strategy should be designed as to how measures can easily be retrofitted when the weather patterns increase temperature. This takes on greater importance on this site, due to local noise and air quality pollution sources which may limit openable windows. **Reason:** To ensure the design of places and spaces avoid overheating and excessive heat generation, and to reduce overheating due to the impacts of climate change, in line with London Plan Policy 5.9**.** **Suggested Condition (4)** **Noise**	

Stakeholder	Comments	Response
	The site is close to several noise sources (industrial building yard, over ground train line, and road junctions all with 50m of the units) which will affect the liveability of the dwellings. The scheme should be designed to ensure that these external noise sources do not affect internal living. This should be designed in through sound insulation measures on this site. This can be demonstrated through achieving at least three out the four credits under HEA 05 (Residential) under BREEAM New Construction 2018. **Reason:** to Support the London Plan Policy 7.15 and local plan DM23. **Suggested Legal Agreement** The Owner agrees to pay the Carbon Offset Contribution of £245,880.00 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. **Biodiversity and Green Roofs** A green roof is considered within the submitted Surface Water Management Report Part 1. We recommend that this is conditioned to be delivered. **Suggested Condition** That prior to commencement on site details on the living roof shall submitted to the local authority for approval. This will include the following: • A roof(s) plan identifying where the living roofs will be located; • Confirmation that the substrates depth range of between 100mm and 150mm across all the roof(s);	

Stakeholder	Comments	Response
	• Details on the diversity of substrate depths across the roof to provide contours of substrate. This could include substrate mounds in areas with the greatest structural support to provide a variation in habitat; • Details on the diversity of substrate types and sizes; • Details on bare areas of substrate to allow for self colonisation of local windblown seeds and invertebrates; • Details on the range of native species of wildflowers and herbs planted to benefit native wildlife. The living roof will not rely on one species of plant life such as Sedum (which are not native); • Details of the location of log piles / flat stones for invertebrates; The living roof will not be used for amenity or sitting out space of any kind. Access will only be permitted for maintenance, repair or escape in an emergency. The living roof shall then be carried out strictly in accordance with the details approved by the Council. And shall be maintained as such thereafter. **Reason:** To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with regional Policies 5.3, 5.9 and 5.11 of the London Plan (2011) and Local Policy SP:05 and SP:13. **Sustainability** There is no assessment proposed on the sustainability of either the residential or retail aspects of the development. Due to the mixed use of this scheme many benefits would be shared. This standard should be conditioned to be delivered. **Suggested Condition**	

Stakeholder	Comments	Response
	The development shall be constructed in strict accordance of the details so approved, and shall achieve the rating of Home Quality Mark Level 4 for all units on the site, and shall be maintained as such thereafter. A post construction certificate 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. In the event that the development fails to achieve the agreed rating for the whole 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 authorities 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 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. **Parking and EVs** There are 7 disabled parking bays as part of this development. These are only for residents. The Wood Green Area Action plan seeks to have 100% active and smart charging infrastructure of bays. While the emerging London Plan requires 40% active provision. If only 40% of the bays are electric, then unless a management strategy is outlined to show how the electric bays will be allocated to residents, the Council recommend all bays to be electric. The Ultra Low Emission Zone (ULEZ) has been confirmed by the GLA on June 8th	

Stakeholder	Comments	Response
	2018 that the ULEZ will expand to North and South Circular roads – affecting all residents in Haringey. Therefore, in upcoming years, we expect to see a significant shift to plug-in vehicles. We recommend a rapid charging unit is installed to provide a charging solution for delivery services for the retail unit. **Suggested Condition** The applicant will deliver electric recharging infrastructure in at least 40% disabled parking bays on site. These shall be maintained and fully operable thereafter. The applicant will deliver recharging infrastructure in 100% of the disabled parking bays on site. This shall be maintained and fully operable thereafter. The applicant shall install a rapid recharging point to serve the delivery bays on site. This shall be maintained and fully operable thereafter. **Reason:** To comply with London Plan Policy 6.13 and Wood Green Area Action Plan Policy WG11, respectively. Additional comments: The applicant has responded on 5 points and these are: **1) Carbon reduction.** They have redone the Energy Assessment. This has now altered the building design for improved energy efficiency. The Energy Assessment has also removed the CHP for communal boilers. Due to this the applicant has re-worded the condition to take this on board. We agree to the following condition.	

Stakeholder	Comments	Response
	Action: To add on the following condition to the development. You must deliver the Energy standards as set out in Energy and Sustainability Statement, by Silcock Dawson and Partners Energy & Sustainability Design Group, (version 2) dated 21/08/2018. The development shall be constructed in strict accordance of the details so approved, and shall achieve the agreed carbon reduction of 20% reduction beyond BR 2013. This shall include: - The U-values as set out in 4.1.1. and 4.2.1. of the Energy and Sustainability Statement; - A solar PV installation of mono-crystalline PV panels with an output of at least 37 kWp or covering at least 232 m2 of flat roof area. The equipment and materials to deliver this standard shall then be maintained as such thereafter. 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. 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. Should the agreed target not be able to be achieved on site through energy measures as set out in the aforementioned strategy, then any shortfall should be offset at the cost of £4,000 in total (per tonne of carbon for 30 years) or by delivering a solar PV installation on a nearby school.	

Stakeholder	Comments	Response
	Reason: To comply with London Plan Policy 5.2. and Local Plan Policy SP:04. **Action:** The applicant has agreed to offset the remaining carbon emissions and offered the Council a total payment of £323,100.00 (covering retail and residential). This should be secured through s106 and paid on completion. 2) Heat Trust The Applicant has accepted the suggested condition but ruled out the Heat Trust requirement. The Heat Trust is designed to protect future residents. No other suggested accountable and auditable system of customer protection has been proposed. The emerging London Plan (SI3) makes reference to this expectation as does the Energy Strategy Guidance issued by the GLA in March 2018. They have asked for the Council to alter the condition to say "The installation shall be in accordance with general rules of the Heat Trust scheme to allow an operator to and manage the installation without need to install any additional equipment". The terminology of "general rules" are too vague. And with the addition of "without the need for any additional equipment" may not protect residents or offer best services to them. Therefore we cannot accept this alteration and suggest the following condition is added: 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:- a) Confirmation that the heat network serves all domestic and non-domestic units on the site. Providing all hot water and space heating loads.	

Stakeholder	Comments	Response
	b) 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; and c) Confirmation that the operator of the heating and hot water network shall achieve the standards set out in the Heat Trust Scheme (an equivalent industry approved, auditable and accountable customer protection scheme can be suggested). And that the developer will sign up to this standard to ensure that users have transparency of costs for customer protection. These standards shall then be continued for the life of the heating and hot water network on the site, unless a regulatory scheme takes its place. 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. **3) Sustainability Assessment** The applicant has rejected the requirement for a Sustainability Assessment for the residential units (Home Quality Mark). But they have highlighted the retail units will be designed to a BREEAM Standard "Very Good". The retail unit should therefore be conditioned as such: You must deliver the sustainability measures as set out in Energy and Sustainability Statement, by Silcock Dawson and Partners Energy & Sustainability Design Group, (version 2) dated 21/08/2018. The retail part of the development shall then be constructed in strict accordance of the details so approved, and shall achieve the agreed rating of "Very good" under BREEAM New Construction (2018) and shall be maintained as such thereafter. A post construction certificate or evidence shall then be issued by an independent	

Stakeholder	Comments	Response
	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. 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. **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. **4) Over Heating Assessment** They have agreed to the Condition on the overheating assessment. This was: The applicant will undertake a London weather pattern dynamic thermal model for the residential units (TM59) using London future weather patterns (TM49). And future weather scenarios - 2020 and 2050 (high emissions scenario) shall be modelled. 5% of units will be modelled and these will be the units most likely to overheat units (south-west corner). If the units do overheat in the current scenarios (2020), passive design measures and technologies should be installed to remove this risk. If the units only overheat in the future weather patterns (2050), a strategy should be designed as to how measures can easily be retrofitted when the weather patterns increase temperature. This takes on greater importance on this site, due to local noise and air quality	

Stakeholder	Comments	Response
	pollution sources which may limit openable windows. Reason: To ensure the design of places and spaces avoid overheating and excessive heat generation, and to reduce overheating due to the impacts of climate change, in line with London Plan Policy 5.9.	
	5) Electric Vehicle Recharging Points They have not answered the requirement of a parking strategy that answer who gets / how the 20% of recharging bays will be managed by residents. And what the design of passive provision looks like. They have rejected the need for rapid recharging points for the freight deliveries. This is found in T7 of the emerging London Plan. And D1 (10) of the current London Plan. **Action**: To require a management strategy of residential Electric Vehicle Charging Points and a Freight Rapid Point in the Parking Management Plan. They did not comment on the condition on the Biodiversity Roof. Therefore I assume that these will be included. This is: **Suggested Condition** That prior to commencement on site details on the living roof shall submitted to the local authority for approval. This will include the following: • A roof(s) plan identifying where the living roofs will be located; • Confirmation that the substrates depth range of between 100mm and 150mm across all the roof(s); • Details on the diversity of substrate depths across the roof to provide contours	

Stakeholder	Comments	Response
	of substrate. This could include substrate mounds in areas with the greatest structural support to provide a variation in habitat; • Details on the diversity of substrate types and sizes; • Details on bare areas of substrate to allow for self-colonisation of local windblown seeds and invertebrates; • Details on the range of native species of wildflowers and herbs planted to benefit native wildlife. The living roof will not rely on one species of plant life such as Sedum (which are not native); • Details of the location of log piles / flat stones for invertebrates; The living roof will not be used for amenity or sitting out space of any kind. Access will only be permitted for maintenance, repair or escape in an emergency. The living roof shall then be carried out strictly in accordance with the details approved by the Council. And shall be maintained as such thereafter. **Reason:** To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with regional Policies 5.3, 5.9 and 5.11 of the London Plan (2011) and Local Policy SP:05 and SP:13.	
Pollution	<u>Air Quality</u> The London Plan, Policy 7.14 states that new development should: • 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)	Comments noted and conditions attached

Stakeholder	Comments	Response
	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. An Air Quality Impact Assessment Report referenced 11295 and dated March 2018, compiled by ITPEnergised was submitted with this application. The proposals include a centralised energy centre comprising a gas-fired Combined Heat and Power (CHP) plant and gas-fired boilers for domestic heating and hot water which details have been presented in the report. The assessment revealed that the proposed development will have a negligible effect on local air quality and is considered suitable for future residential and commercial development. The proposed development was assessed to be air quality neutral. Find below my comments: • Was the development-generated traffic estimate by the Transport Consultants (Transport Planning Associates) agreed with TFL; the assessment made a conclusion that the number of daily HGV construction vehicle movements during peak construction	

Stakeholder	Comments	Response
	has been estimated to be between 10-50 HGV movements and will therefore not exceed the EPUK criteria. The additional number of vehicle movements is not considered to be high enough to have the potential to cause a significant adverse effect at any local air quality sensitive receptor. The effect on local air quality sensitive receptors will be not significant and construction phase road traffic emissions are therefore not considered further in this assessment. • Details of the centralised energy centre comprising a gas-fired CHP plant (2 x 49.5kW SAV Systems XRGI-15 units) and two gas-fired boilers (up to 533kW output Hoval Ultra-Gas Condensing boilers) for domestic heating and hot water should be provided to the local authority • The 2016 data for LBH monitoring sites are suitable for model verification within the study area. The following conditions are recommended: **<u>Air Quality Assessment</u>** • An updated Air Quality Assessment, taking into account emissions from boilers and combustion plant, road transport sources and the 2016 data for LBH monitoring sites must be undertaken and submitted for approval. *Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction*. **<u>Contaminated land:</u>**	

Stakeholder	Comments	Response
	A Phase I Geo-Environmental Assessment Report 44-46 High Road, Wood Green, London, N22 6BU referenced LS 3193 (V1.1) and dated April 2018 and compiled by Land Science was submitted with the application. The Geo-Environmental Assessment Report plus maps referenced LS 3193 (V1.1), dated April 2018 was submitted at the application stage. This report presents amongst other issues a preliminary conceptual site model of contamination, identifying possible pollutant linkages. The conceptual model indicates potential pollutant linkages with a risk of low to medium from the potential historical use of heating oil, made ground and off- site former railway land. The report recommends that an intrusive investigation should be conducted including: • *Shallow boreholes, or trial pits, to assess the composition and depth of any Made Ground and any field evidence of contamination into the underlying soils.* • *Selected samples (including materials bearing field evidence of contamination) should be sent for laboratory analysis. The main analytical suite is identified below.* • *If Made Ground or alluvial deposits is proven to be >1m thick, several shallow standpipes should be installed in boreholes with different response zones, to assess the potential for ground gas generation on site, along with return monitoring.* ***The analytical suite, based on the known site history and walkover survey, should include:*** • *General parameters: Acidity (pH), fraction of organic carbon.* • *Metals; Arsenic, Cadmium, Chromium (total), Lead, Mercury, Selenium, Boron, Copper,* • *Nickel and Zinc.* • *Organic Compounds; TPH, BTEX, Speciated PAHs and PCBs (to be targeted so that they are close to the electrical substation).* • *All samples of Made Ground should be laboratory screened for the presence of asbestos.*	

Stakeholder	Comments	Response
	• *Where possible asbestos fibres or ACMs are identified, these should be examined under a microscope to determine type.* *Further positions may be required, additional samples analysed or additional determinands added to the analysis, as appropriate, based on any field evidence of possible contamination encountered.* *Water is not anticipated at the site but if encountered it should be sampled and tested.* *In addition, the requirement for Waste Acceptance Criteria (WAC) testing should be considered to categorise soils in terms of disposal.* *It would be prudent to confirm the scope of ground investigation works with the Local Authority and other stakeholders before carrying out these works.* The proposed works are generally acceptable. **Contaminated land: (CON1 & CON2)** **CON1:** Before development commences, other than for investigative work and demolition: a) Using information obtained from the Geo-Environmental Assessment Report plus maps an intrusive site investigation, sampling and analysis shall be undertaken. The 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. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.	

Stakeholder	Comments	Response
	b) If the approved risk assessment and approved 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. *Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.* And **CON2:** • 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*. **Combustion and Energy Plant:** • 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 domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh.	

Stakeholder	Comments	Response
	<u>Reason:</u> To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction **<u>Management and Control of Dust:</u>** • 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. *<u>Reason</u>: To Comply with Policy 7.14 of the London Plan* • 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. *<u>Reason</u>: To Comply with Policy 7.14 of the London Plan* <u>NRMM</u> • 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. *<u>Reason:</u> To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ*	

Stakeholder	Comments	Response
	• 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* **As an informative**: 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.	
Waste Management Officer	**1 x 3 bed Mews House & 5 x 4 bed Mews House:** Required: 1 x 240L refuse, 1 x 240L recycling, 1 x 25L food waste. 5 x 360L refuse, 5 x 360L recycling, 5 x 25L food waste. Pulling distance within 25m Green garden waste is now an opt in paid service. RAG traffic light status of GREEN **82 x 1 bed, 33 x 2 bed, 7 x 3 bed flats:** Required: 14 x 1100L refuse, 6 x 1100L recycling, 7 x 240L food waste Pulling distance within 10m	Comments noted. Condition attached.

Stakeholder	Comments	Response
	1280L bins and 340L food waste bins are not used in Haringey due to the operational problems they produce in weights and dimensions. BS calculation was incorrect and it is only guidance. The calculations are not robust enough we are however aware that the application did make some additional calculations. The above requirements are what's needed to be assured. There needs to be assurances that gradients will be within the 1:20 Haringey requirements and dropped kerbs installed. Application has stated management service to be in place to ensure receptacles are within 10m of Vehicle: ACCEPTED RAG traffic light status of AMBER **Commercial Waste:** Commercial waste must be stored and collected separately from residential waste. Arrangements for a scheduled waste collection with a Commercial Waste Contractor will be required. The business owner will need to ensure that they have a cleansing schedule in place and that all waste is contained at all times. 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. RAG traffic light status not applicable	

Stakeholder	Comments	Response
	Total overall rating AMBER Additional comments: I agree that based on the attached notification the status can be moved from Amber to Green	
Building Control	This department has no objection to this application. This type of work will require a Building Regulation application to be made after Planning permission has been granted. You may also contact Haringey Building Control for Free Application advice/meeting to discuss the scheme further in particular B5 - fire brigade Access. Please contact us with ant queries you may have at: Building.control@haringey.gov.uk	Comments noted.
Arboricultural Officer	There are no existing trees within this new development site. It is proposed to plant 5 new 'street trees' at the rear in planters adjacent to Bury Road. The Landscaping Statement also proposes a number of additional new trees within the central communal area. I have concerns about the new street trees being installed in planters. Careful consideration must be given to this as there are a number of problems that would seriously impact the trees ability to grow successfully. The container must have adequate space to accommodate both the growing tree and its roots. The soil used must maintain sufficient aeration and drainage while retaining suitable amounts of moisture. Good container soil retains adequate levels of water without becoming waterlogged. Trees in containers require constant maintenance throughout their lifespan, particularly irrigation. Containers are very prone to drying out. The soil	Comments noted. Conditions included for tree protection and landscaping.

Stakeholder	Comments	Response
	will also have to be enriched annually as the existing nutrients in the soil at the time of planting will soon diminish. Tree roots in containers may also die during summer if the soil temperature becomes too hot, exceeding air temperatures. The heat from pavement can quickly cause the soil in containers to become excessively hot, burning the roots and drying out the soil. It would always be preferable to create tree pits in the existing ground to enable the planting of new trees. There is an existing street tree to the right at the front of 44-46 High Road, N22. This tree must be adequately protected with hoarding to prevent any damage during the demolition and construction phases.	
Noise Specialist	I have read the acoustic planning report produced by Acoustic Logic doc reference no 20170025.1-BG-APR.01 dated 3rd April 2018. There are no objections made in principle to this proposed development however the following conditions shall apply; **External Plant Noise Design Criteria** Noise arising from the use of any plant or any associated equipment shall be set at 5dB below the existing background noise level ($LA_{90\ 15mins}$) when measured ($LA_{eq\ 15mins}$) 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 any plant equipment does not cause noise nuisance within any residential or noise sensitive premises. An assessment of the expected noise levels shall be carried out in accordance with BS4142:2014 and any mitigation measures necessary to achieve the required noise level shall be submitted to the Local Authority Planning Authority in writing, for approval. The plant shall be installed and maintained in accordance with the approved details. *REASON: to ensure high quality residential development and protect the amenity of the locality* **Internal Noise Criteria in Habitable Rooms** Section 4 of the report assessed the existing environmental noise level and predicted the	Comments noted. Conditions included.

<table>
<tr><th>Stakeholder</th><th>Comments</th><th>Response</th></tr>
<tr><td></td><td>glazing requirement for the proposed development at the North-east, North-west and South-east elevations. The report predicts that with the installation of the specified recommended glazing inclusive of a fully, or partially mechanically ventilated system the following internal noise levels in accordance with BS8233:2014 below will be achieved within the proposed residential units (with the windows closed);

<table>
<tr><th>Time</th><th>Area</th><th>Maximum Noise level</th></tr>
<tr><td rowspan="2">Daytime Noise 7am – 11pm</td><td>Living rooms and Bedrooms</td><td>35dB(A)</td></tr>
<tr><td>Dining Room/Area</td><td>40dB(A)</td></tr>
<tr><td>Night Time Noise 11pm - 7am</td><td>Bedrooms</td><td>30dB(A)</td></tr>
</table>

A test shall be carried out prior to the discharge of this condition to show that the required noise levels have been met and the results submitted to the Local Planning Authority for approval.
REASON: To ensure high quality residential development

Scheme of Sound Insulation
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 Council’s Noise Team about the end user. The scheme shall be installed as approved prior to any commercial occupation of the site, including the music studio, and shall be maintained thereafter.
REASON: to protect the amenity of the locality.

Advisory – Construction and Demolition
Contractors/Developers undertaking noisy construction works within the London Borough of Haringey are restricted to the following dates and times;</td><td></td></tr>
</table>

Stakeholder	Comments	Response
	Monday – Friday *08.00 – 18.00hrs* *Saturday* *08.00 - 13.00hrs* *Sundays & Bank Holidays* *No Noisy Works* *(Major developments are encouraged to apply for prior consent under section 61 of the Control of Pollution Act 1974)*	
School Places	Thanks for your latest planning application. Having looked through the plans we feel that although the development may result in some additional need for local school places there is enough existing surplus capacity in Planning Area 5 (Noel Pak, West Green, Woodside, South half of Bounds Green and north half of Harringay wards) to cope with the likely additional yield. We therefore have no comments on this application from a school place planning perspective.	Comments noted.
Emergency Planning	No immediate concerns with this application from me.	Comments noted.
Licensing	No objections raised.	Comments noted.
Regeneration	No objections raised.	Comments noted.

EXTERNAL		
Environment	Thank you for consulting us on the above planning application. We have reviewed the	Comments are

Agency	information submitted and have **no objections** to the proposals subject to the conditions listed below being invoked on any planning permission granted. This site is in a source protection zone 1 for public water supply and without these conditions the proposed development poses an unacceptable risk to the environment. **Condition 1** 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 of water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework. **Condition 2** No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details. **Reasons** To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 109 of the National Planning Policy Framework. **Condition 3** Piling, deep foundations and other groundworks (investigation boreholes, tunnel shafts, ground source heating and cooling systems) using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details. **Reasons** To ensure that any proposed piling, deep foundations or other groundworks using penetrative methods does not harm groundwater resources in line with paragraph 109 of the National Planning Policy Framework. Some piling techniques can cause preferential pathways for contaminants to migrate to groundwater and cause pollution. A piling risk assessment and appropriate mitigation	noted. Conditions included.

	measures should be submitted with consideration of the EA guidance. **Condition 4** A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of any part of the permitted development. **Reasons** To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 109 of the National Planning Policy Framework **Informative** **Surface water drainage informative** Infiltration of surface water has the potential to mobilise contamination present within the soil. Where the proposal involves the discharge of anything other than clean roof water via sealed drainage, within sensitive groundwater locations, a risk assessment and suitable level of treatment may be required. In certain circumstances the discharge may be classified as a groundwater activity and require an environmental permit. **Piling informative** During piling works (especially if the piles extend to the Chalk within SPZ1 saturated zone) due to the proximity of nearby potable abstractions the weekly groundwater monitoring for insitu parameters and turbidity should be considered. http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/scho0202bisw-e-e.pdf	
Thames Water	Waste Comments Thames Water would advise that with regard to waste water network and waste water	Observations have been

	process infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes. The proposed development is located within 15m of our underground waste water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://developers.thameswater.co.uk/Developing-alarge-site/Planning-your-development/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB Water Comments Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a water strategy but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows from the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure	taken into account and conditions and informatives included

	phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval. The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains and have contacted the developer in an attempt to agree how the, asset will be diverted / development will be aligned. We have been unable to agree a position in the time available and as such Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.	

	Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk. The proposed development is located within 15m of a strategic water main. Thames Water have contacted the developer in an attempt to agree a piling methodology, but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water 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 water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes. Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk	
Metropolitan Police	Thank you for allowing us to comment on the above planning proposal.	Observations have been

	With reference to the above application I have now had an opportunity to examine the details submitted on the local authority website under ref number HGY/2018/1472 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. 1.0 It is my professional opinion that crime prevention and community safety are material considerations for any developer, because of the proposed use, design, layout and location of the development proposed. 2.0 I can confirm that at this point in time I have met favourably with the project architects to discuss their intentions around security or Secured by Design (SbD). 2.1 I have reviewed the planning application and have areas of concern that we believe presently exist with the proposed development (As detailed in Appendix 3.2). As such the police would ask that a condition is added by the local authority, as laid out in section 3.2.The inclusion of any such condition would assist to reassure police concerns . **Community Safety – Secured by Design Conditions:** 3.0 Crime prevention and community safety are material considerations. If the L.B Haringey, are to consider granting consent, I would ask that the recommendations 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. 3.2 **The development shall only be carried out in accordance with the approved details.** **(1) 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**	taken into account and amendments to the plans made where possible. Condition included.

	such building or use and thereafter all features are to be permanently retained. **(2) 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.** The services of MPS DOCOs are available free of charge and can be contacted via ***docomailbox.ne@met.police.uk*** or 0208 217 3813. **Crime Figures:** 4.0 Crime and disorder is a factor for consideration with this application. Crime data affecting this application is highlighted in appendix 2 below. **Legislation & SBD Guidance:** 5.0 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: ▪ 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; 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 both for residential and non residential developments. 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** . **Conclusion:** I would ask that my interest in this planning application is noted and that I am kept appraised of developments. Additionally, I would welcome the opportunity of sitting in on any meeting you might have concerning this proposal.	
London Fire Service	The Brigade is satisfied with the proposals. This Authority 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. Please note that it is our policy to regularly advise our elected Members about how many cases there have been where we have recommended sprinklers and what the outcomes of those recommendations were. These quarterly reports to our Members are public documents which are available on our website.	Comments noted.
Transport for London	TfL Reference: 18/2036 Planning Application: HGY/2018/1472 44-46 High Road, N22 6BX	Comments noted and will be dealt with

	Demolition of the existing building and erection of 3-9 storey buildings providing residential accommodation (Use Class C3) and retail use (Use Classes A1-A5) plus associated site access, car and cycle parking, landscaping and ancillary development Thank you for consulting Transport for London with regard to the above planning application. TfL has the following comments: The site is located on the A105 High Road which forms part of the Strategic Road Network (SRN). TfL have a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The site is also adjacent to the Crossrail 2 safeguarding area. 1. The footway and carriageway on the A105 High Road should not be blocked during the works. Temporary obstructions during the conversions should be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians or obstruct the flow of traffic on the A105 High Road. All vehicles should only park/stop at permitted locations and within the time periods permitted by existing on-street restrictions. 2. The development is proposed to be car-free apart from disabled spaces, which is welcome given the excellent public transport links that the site benefits from. 3. A total of 7 disabled parking bays are proposed on-site. A further 3 public disabled parking bays are available on Bury Road. TfL finds this acceptable from the outset. In line with draft New London Plan Policy T6.1, a Car Parking Design and Management Plan should be secured by condition. This should outline how the remaining disabled bays up to a total of one per dwelling for 10% of dwellings can be requested and provided as disabled parking in the future. 4. In line with draft New London Plan Policy T6.5, the applicant should explore the provision of a disabled bay for the commercial element of the development. 5. The applicant proposes to provide Electric Vehicle Charging Points (EVCPs) in line with the current London Plan for the disabled car parking spaces (20% active EVCPs and 20% passive EVCPs). The applicant is strongly encouraged to increase this to meet draft New London Plan standards – 20% active and the	by conditions and legal agreement as appropriate.

	remaining spaces all being provided with passive provision (80%). 6. With regard to trip generation, TfL would have preferred the use of surveys for the existing site as they provide a more accurate representation of the current use than selecting sites from TRICS. It is also unclear why local Census data has not been used to derive mode shares, as this is likely to provide a more accurate forecast than TRICS. The applicant should provide a response on this. 7. The applicant has provided a PERS and CLoS assessment, which is welcome. In line with draft New London Plan Policy T2, Haringey Council are encouraged to use the results of this to secure improvements to the local walking and cycling environment. 8. Residential cycle parking exceeds current London Plan standards which is welcome. 9. The commercial cycle parking quantity has been calculated using Gross Internal Area (GIA). The current London Plan and draft New London Plan both require Gross External Area (GEA) to be used to calculate cycle parking standards. The applicant should therefore provide the GEA of the commercial floorspace so TfL can assess the required cycle parking quantity. 10. Residential cycle parking is located on the first floor and is accessed via a lift. In line with London Cycle Design Standards (LCDS) guidance the lift should be at least 1.2mx2.3m. It is understood that residential short-stay cycle parking is proposed to be included as part of the secure internal facility. TfL's preference would be for this to be provided in the public realm/on-street if possible. 11. The applicant is reminded that in line with LCDS guidance, at least 5% of spaces should be enlarged, to provide space for larger or adapted cycles. This should be provided. 12. Details of cycle parking in accordance with LCDS guidance should be secured by condition. The applicant should consider the type of cycle parking proposed; if two-tier racks are used they should be fitted with a mechanically or pneumatically operated system for accessing the upper levels. 13. A Construction Logistics Plan should be secured by pre-commencement condition, which TfL should be consulted on. This should follow TfL guidance, available here: http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-	

	developers.pdf 14. Details on delivery and servicing have been provided in the Transport Assessment. The applicant proposes that the existing loading bay on High Road will be used for retail servicing and refuse collection. TfL will need to be reassured that this bay can cope with the amount of vehicles that will service the site. A Delivery and Servicing Plan should be secured by condition which TfL should be consulted on. This should follow TfL guidance, available here: http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf 15. Framework Travel Plans have been provided for the residential and retail use. TfL finds the content of these acceptable. The Full Travel Plan should be secured, monitored and reviewed through the section 106 agreement. 16. The site is in close proximity to London Underground infrastructure. Therefore London Underground Infrastructure Protection have responded to this application and requested certain condition are secured. TfL requires the above to be addressed before we can be supportive of this application. Additional comments: We have no objection to the proposals.	
London Underground Infrastructure Provision	Though we have no objection in principle to the above planning application there are a number of potential constraints on the redevelopment of a site situated close to underground tunnels and infrastructure. Therefore, it will need to be demonstrated to the satisfaction of LUL engineers that: • the development will not have any detrimental effect on our tunnels and structures either in the short or long term • the design must be such that the loading imposed on our tunnels or structures is not increased or removed • we offer no right of support to the development or land	Comments noted. Condition included.

	Therefore we request that the grant of planning permission be subject to conditions to secure the following: The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for demolition, all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which: • provide details on all structures • provide load calculations • accommodate the location of the existing London Underground structures and tunnels • accommodate ground movement arising from the construction thereof • and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels. The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied. **Reason:** To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012. We also ask that the following informative is added: The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular	

	with regard to: demolition; excavation and construction methods;	
Crossrail 2 Safeguarding	Thank you for your letter dated 22 May 2018, requesting the views of the Crossrail 2 Project Team on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction. I have no comment on this application.	Comments noted.

LOCAL REPRESENTATIONS: ***68 LETTERS FROM RESIDENTS – 7 IN OBJECTION, 59 IN SUPPORT & 2 COMMENTS*** ***1 OBJECTION FROM LONDON ASSEMBLY MEMBER*** ***1 OBJECTION FROM MEMBER OF PARLIAMENT***	**Land Use** • Loss of commercial uses • Residential use is inappropriate for this location	A large retail unit would be provided fronting onto High Road. The site is allocated for housing as part of the Council's Development Plan.
	Housing • Insufficient provision of affordable housing • Overcrowding • Flats are too expensive • Lack of affordable rent units	Affordable housing provided is above the maximum level viable as indicated by the Financial Viability Appraisal. Density is only marginally above the indicative levels in the London Plan matrix. 22 discount rental properties would be provided. All affordable units would be provided at discounted rental levels.
	Design • Poor design	The design is appropriate for the area and is supported by the Council's Design Officer.

	• Excessive height • Excessive size and scale • Overbearing appearance • Out of keeping with local character	The proposed height is of a similar scale to other buildings in the area, including Page High. The height is similar to other properties, whilst set back from street and articulation would minimise massing of the buildings. Upwardly projecting elements are set back behind a ground floor podium. The materials, size and scale take cues from buildings in the surrounding area.
	Heritage • Lack of consideration of retail heritage	Building is dated, not listed in any form, and not fit for current retail demands.
	Residential Amenity • Loss of day/sunlight; • Loss of outlook;	Impact on daylight and sunlight to nearby properties would be almost entirely within BRE guidelines. The separation distance of the proposed building from neighbouring properties would

		be significant enough to prevent loss of outlook.
	• Loss of privacy	See above.
	• Increased overlooking	See above.
	• Increased air pollution	Expected vehicle movements from this site would decrease as the result of the development, improving air quality. No other significant air quality impacts.
	• Increased light pollution	Light from properties would not affect nearby dwellings.
	• Increased pollution (general)	Street pollution is not anticipated to increase by an excessive level.
	• Increased noise disturbance from vehicles and servicing	Anticipated number of vehicles would reduce compared to the existing activities. Servicing would be from High Road, where traffic is already common.
	• Disturbance from building works;	Building works cannot be avoided for new developments and are controlled by non-planning legislation.

	Highways and Transport • Insufficient local parking availability • Loss of pedestrian safety • Insufficient local transport infrastructure • Impact on Crossrail 2 route	 Very good public transport connections mean that car ownership levels for this development would be low. Pedestrian activities would not be impacted by this development. Local transport infrastructure is very good, and due to improve in coming years. The Crossrail 2 Safeguarding threshold is located outside of this site.
	Health and Social Facilities • Insufficient local social care infrastructure • Lack of space in local schools	 No anticipated increase in demand for social care infrastructure. Council's School Places Planning team have stated that there is adequate space in local schools.

	Other • Damage to Bury Road from additional traffic	Expected number of vehicle movements from this development would reduce overall. Bury Road would see physical improvements resulting from this and adjacent developments.
	• Impact on television and internet reception	No impact is anticipated.
	• Council should not sell public land	The application site is in private ownership.
	• Developer cannot be trusted	This is not a material planning consideration.