Appendix 1 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Building Control	No objection.	Noted.
Conservation	**Site and surroundings:** 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, there is the possibility that the development would affect the settings of several heritage assets nearby. The significance of each and the impact of the proposed development on that significance is assessed below. **Legislation, Policy and Guidance** Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 gives rise to a statutory duty to pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas in the exercise of planning functions. Section 66 (1) contains a similar duty, when considering planning applications that would affect a listed building or its setting, to have special regard to the desirability of preserving the building or its setting. Recent Court of Appeal decisions in the cases of The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council, and the Queen (on the application of The Forge Field Society) v Sevenoaks District Council emphasis that these considerations should be given considerable importance and weight. The NPPF states that great weight should be given to the conservation of designated heritage assets when considering the impact of proposed developments (paragraph 193), and that any harm to the significance of a designated heritage asset should require clear and convincing justification (paragraph 194). It also states that the effect on the significance of non-designated heritage assets should be taken in to account. London Plan Policy 7.8 requires that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. (Draft London Plan Policy HC1 continues this approach.) Haringey Local Plan Policy SP12	Noted and conditioned.

	seeks to conserve the significance of Haringey's heritage assets and their setting (including conservation areas, Statutory Listed Buildings and Locally Listed Buildings). Local Plan Policy DM9: Management of the historic environment continues this approach. The setting of a heritage asset is defined in the NPPF as 'The surroundings in which an asset is experienced'. The Government's Planning Practice Guidance gives further detail on how settings should be taken in to account, highlighting the importance of views and visual considerations, and noting that other factors such as our understanding of the historic relationship between places may also play a role. Historic England's Historic Environment Good Practice Advice Note 3: The setting of heritage assets offers detailed guidance on the assessment of setting in decision taking. I have also had regard to Historic England's GPA 2: Managing Significance in Decision-Taking in the Historic Environment, and Conservation Principles (2008). **Assessment of proposals:** The applicants have provided enough information to understand the impacts of the proposal on the significance of various heritage assets, including an adequate Townscape and Visual Impact Assessment (TVIA). Key viewpoints in the TVIA were identified in consultation with Council officers. Noel Park Conservation Area: Noel Park Conservation Area is located to the north east of the site. It is a late Victorian planned estate comprising various streets of terraced houses, a school, community hall, and Church. It is significant as an example of a Victorian philanthropic housing development aimed at improving living conditions for tenants, and because of its carefully composed layout, townscape qualities, and architectural character. St Mark's Church and adjacent church hall are listed at Grade II. Both are set on a planned island site near the south-west boundary of the CA, which is an important townscape feature. The proposed buildings would not be visible from most of the conservation area, but would be visible in some views from its south-west extremity (nearest to the development site) where St Mark's Church is Located. The viewpoint within the CA that is most likely to be adversely affected is assessed in the TVIA (View 13). The proposed building would be visible in the background of the view, but would be largely concealed behind foreground buildings. It would not be prominent, and would appear similar in scale to existing High Road buildings. Any impact on the setting of the conservation area or St Mark's Church and Church Hall would be negligible.	

	Bury Road and Westbeech Road were originally part of the Noel Park Estate, which spanned the railway when first built. Surviving original houses on these streets are in the same style as the rest of the estate. (Bury Road was originally a residential street with houses on both sides.) Later development following the closure of the railway separated these streets from the rest of the estate, and it is not part of the CA. However, this area does contribute to the setting of the Conservation Area. There is no direct visual connection, but it has a clear historical and aesthetic relationship with the estate, and contributes to our appreciation of its history. The impact of WW2 bomb damage and large developments along the High Road in the 1970s affected both the character of these streets, and the setting of the conservation area. This is noted in the Council's Noel Park Conservation Area Appraisal and Management Plan (2016) section 7, which specifically highlights the adverse impact of service access to large commercial premises. None of the houses on Bury Road would be directly affected, but the proposed development would have a transformative impact on the character of the street. Large-scale commercial buildings serviced from Bury Road have severely compromised its original residential character. While the proposed replacement buildings would be larger still, their height and massing would step down towards Bury Road and would be articulated to relate more appropriately to the existing houses. Featureless rear walls and servicing entrances would be replaced by new maisonettes with entrances on the street - a considerable improvement that would restore some of the street's original layout and residential character. The detailing and materiality of the new building would complement the historic houses opposite, and in the nearby CA, and the new layout would reinstate a connection to the High Road that was lost when Dovecote Avenue was built over in the 1970s. Overall, this would provide a considerable improvement that would enhance and better reveal the historic character of these streets and their connection to the Noel Park Conservation Area. The improvements are in line with Local Plan Policy DM9 C, which states that the Council will have regard to the desirability of preserving or reinstating the original historic form, fabric, function or character of heritage assets and their setting. Cheapside Parade: Cheapside Parade (on the High Road to the north of the site) was also built as part of the Noel Park Estate, and contributes to its setting. Its richly decorated facade includes the surviving frontage of the former Wood Green Empire Theatre by Frank Matcham, and makes a	

	positive contribution to the street scene. Although it is not currently included on the Council's published Local List, the terrace has sufficient heritage interest to warrant consideration in the planning process, and should be treated as a 'non-designated heritage asset'. The proposed buildings would front on to the same stretch of High Road, but some distance south of Cheapside Parade, which would not be directly affected by the development. Any adverse impact on its setting would be caused by the increase in height on the development site: the existing buildings on the site (while completely different in character) are a similar height to the historic terraces. The TVIA analysis (view 2) shows that the visual impact would be minor because of the intervening distance. I also note that there are a number of existing buildings in the area of a larger scale – most notably Shopping City. Any adverse impact on the significance of the terrace would be negligible. Turnpike Lane Station Complex: Turnpike Lane underground station (Grade II Listed) and bus station (Locally Listed) are located at the junction of Turnpike Lane and the High Road, south of the site. The station was built in 1932 as part of the Piccadilly Line extension to the design of Charles Holden, and is of considerable architectural interest. It is prominently located on an open island site opposite Duckett's Common. The group's layout, modernist architectural style, and low, horizontally articulated form set it apart from earlier buildings in the immediate area. The TVIA analysis shows that the proposed new buildings would not be visible from the station, but would be visible in views of the station complex from Duckett's Common (View 7) and from Green Lanes (view 6). There would be a minor to moderate visual impact, with the new buildings appearing noticeably larger. However, they would be in the background of both views and would not impinge upon the open setting of the station or obscure it from view. The distinctive square towers with Underground signage would still be clearly visible. The wider streetscape is already quite mixed, and the proposed buildings would not look incongruous. The interior of the partially sunken station entrance hall is dramatically lit by large rectangular areas of glazing to the north, west and east facades. The proposed development would not have any impact on the level of daylight or sunlight illuminating the space, and so would not affect this feature of the interior. Alexandra Palace and views: There are wide panoramic views from Grade II Listed Alexandra Palace and its surrounding park (contained within Alexandra Palace and Park Conservation Area).	

	There is a strategic view (identified in the London Plan) from Alexandra Palace towards Central London and St Paul's Cathedral. The proposed buildings would be visible in wide views from Alexandra Palace, but would not appear out of scale with surrounding buildings, or be particularly noticeable: the location offers panoramic views of the whole city, in which buildings of various types and scales are visible. The new buildings would sit a long way outside of the specific view corridor identified in the London Plan, and so would not affect the setting of Grade I Listed St Paul's. The proposed development also sits within the view corridor of a locally identified view of Alexandra Palace from Downhill Park. The TVIA indicates that the upper parts of the proposed buildings would be just visible above foreground buildings in this view, but would not obscure any part of Alexandra Palace itself. I am satisfied that there would be no adverse effect on the setting of Alexandra Palace through impact on this view. **Summary and Conclusions:** The development has the potential to affect the settings of various nearby heritage assets including the Noel Park Conservation Area and several Listed and locally listed buildings. I have assessed the likely impact of the proposed development on each of these, having regard to relevant legislation, policy and guidance. I am satisfied that there would be no harm to the significance of any designated (or non-designated) heritage asset. The proposed development would also improve the setting of Noel Park Conservation Area somewhat, through improvements in the Bury Road area that would enhance and better reveal the historic character of the streets and their connection with the Noel Park Estate. Decision makers should give considerable importance and weight to the desirability of preserving or enhancing the significance of designated heritage assets, as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. The objective would be met in this case. The proposed development would also comply with the requirements of National and Local Policy relating to the historic environment. **Recommendations:** There is no objection to the proposed development on conservation grounds. Further details of the proposed development should be secured by condition in line with the design officer's specific advice. This could include external materials, landscaping materials, and boundary treatments and	

	waste storage on Bury Road. The site is not within an Archaeological Priority area, but is 0.8 hectares in area. GLAAS request that they are consulted on all major developments over 0.5 hectares, whether in an APA or not. GLAAS's published archaeological risk model indicates that there is a low (but not negligible) risk of a development of this size and location having archaeological implications. <u>Supplementary comments:</u> I was aware of that [*comments raised by Historic England*]. We've always taken the view that it doesn't have sufficient heritage interest to be treated as a non-designated heritage asset (although it does have some). This would have been considered when the site was allocated. At that time it was decided that 'no buildings need to be retained'. We also just reviewed our local list of NDHAs and didn't include it. If we did treat it as a non-designated asset, we would have to take a balanced approach having regard to the level of significance. Retention would seem to be incompatible with redevelopment of the site in line with the Local Plan (and the various public benefits associated with that), so loss of the building would most likely be justified in any case. (In that scenario, we might be looking for some recording/mitigation).	
Design Officer	**Summary** This proposal is a well-designed redevelopment of a large and 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. The proposed blocks in the development are all well designed and proportioned, in distinctive, contrasting yet appropriate complimentary and contextual materials. In what is probably the stand-out, impressive, innovative contribution, the proposals include a hugely convincing solution to the site allocation requirement for a "laneway", in the form of an animated, landscaped public courtyard providing a connection from residential streets behind to the High Road, a transition between the hustle and bustle of the High Road and those quieter residential streets,	Noted and conditioned

	secondary frontage suitable for employment uses and a “dwell-space” providing outdoor seating and playspace for shoppers’, workers’ and residents’ rest, recreation and social interaction. As well as retail and employment, the proposals include a convincing and attractively designed hotel, providing employment, secondary frontage and transition on the other street connecting the High Road to the residential hinterland. The main bulk of the development over the retail and employment use contains a significant quantum of new housing in a mixture of sizes, tenures and affordability, yet all to good amenity standards. 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 potential 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 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 100m to the south of the site with Wood Green Tube Station, 700m 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. Whymark Avenue forms the south-eastern boundary, Bury Road the north-eastern and neighbouring existing buildings the north-western boundary. 2. The site of this application is currently occupied by a single, large floorplate retail building, and a row of adjoining medium floorplate retail buildings, with a service yard behind. The buildings are of mostly two storeys, probably built in the 1960s and probably purpose-built for the British Home Stores retail chain that vacated the site some two to three years ago. These ugly existing buildings are not considered to have any architectural merit; above their continuous ground floor retail frontage, their first floor is a blank façade of “brutalist” bush-hammered, pre-cast concrete panels, sometimes with high level “slit” windows, and have an alienating face to the High Road. 3. The site also includes the adjoining “Mothercare” & “Bonmarché” building, a similar larger-floorplate retail unit with a crème & green tiled 2nd storey onto the High Road. It stretches back to Bury Road, as does the former BHS unit, with the smaller units in between being less deep in plan,	

	leaving a roughly square service yard on the Bury Road frontage between them. Where the former BHS fronts Whymark Ave., its façade is the same bush hammered concrete, albeit with a blank white tiled ground floor, whilst both facades to Bury Road are of utilitarian blank brickwork. Part of the former BHS rises to 3 storeys here, with 4 storey stair cores. 4. Between the former BHS and the corner of Whymark Avenue are three smaller modern retail units that are not part of this development, nos. 16 – 20 High Road. The building containing them is modern, of three storeys, glass clad to both streets and containing a restaurant across both upper floors of all three shops. There is a small service yard behind, between it and the return side of this application site onto Whymark Ave. Between no. 20 and the former BHS store, there are two more small retail units that do form part of the application site. Both are long single storey retail extensions to the pavement line from the original 19th century 2 or 3 storey house, who's upper floors incongruously survive, well set back between blank party walls and severed from their context. 5. Whymark Avenue runs off the High Road and forms part of the south-eastern boundary of the site. This street transitions from retail frontage to the High Road, through secondary retail, service access for retail and, opposite the site two modest, fairly recent flatted blocks; Whymark House, with blank non-residential / retail-servicing ground floor and 2 floors of flats over; and York House, with part residential, part retail ground floor and resi above. At the corner of Bury Road and opposite, Whymark transitions to residential, two storey, terraced houses, Edwardian, of red brick and with prominent bay windows. 6. Bury Road runs off Whymark Avenue and parallel to the High Road, forming the north-eastern boundary to the site; this is a schizophrenic street, with low rise residential properties on most of 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. Most of 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 (but not this separated section) to be designated a Conservation Area. However, some of the housing on Bury Road further north of the site appear to be immediate post-war, post-bomb-damage, two and three storey flatted block replacements, albeit in similar brick and slate pitched roofs. Westbeech Road forms a T-junction with Bury Road opposite the site; this street was also laid out as part of the estate and the house on the corner of Bury and Westbeech is an excellent example of how corners were elaborated in distinctive, interesting ways with turrets and bays to address both street frontages	

	and treat the corner as special. Westbeech also forms the boundary of the estate, and the north-east side of Bury Road opposite the side becomes, from there, the fences and outbuildings of back gardens of the houses on Whymark Road. 7. Beyond the application site to the north-west, there are further to retail properties, with frontage to the High Road and generally service access from Bury Road. Immediately adjacent is no. 42a, a small retail unit with two storeys of flats above. Beyond that is another large floorplate retail unit, the former Marks & Spencer's at no. 44-46; it's rear is immediately adjacent to the application site, large scaled and of four storeys. The current Sainsbury's is beyond that. The character of this side of the High Road then changes to older, more traditional Edwardian retail parades of 3-4 storeys, although with the 8-9 storey high 1970's Page High housing atop service yards and multi-storey car park at the northern end of the Bury Road, behind. 8. 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. Planning Policy Context 9. Wood Green, including the location of the site, is identified in the London Plan as a Metropolitan Town Centre and is one of the Growth Areas identified in the Council's Local Plan 2013. 10. 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 on the consultation and revisions to the draft AAP 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. 11. The adopted DPD Site Allocation SA14 reads: 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, the potential for a taller building beside Turnpike Lane station, ground and first floor town centre uses and a wider pavement along the High Road frontage. 12. 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. 13. There has been a previous application for the former M&S site part of this site allocation, adjoining this application site. The application, ref. no. HGY/2018/1472, was for a similar mix of development, albeit containing no non-residential use apart from (part) ground floor retail filling their High Road frontage. The design approach had similarities but also crucial differences to this application. It also proposed a lower proportion of affordable housing. That application was refused at committee 23/10/2018, and is now subject of an appeal, yet to be decided. The rest of the Allocation Site comprises Sainsbury's (nos. 50-56), no. 42a & nos. 16-20, three units with a restaurant over that forms the rest of the block where Whymark Ave. meets the High Road. 14. Other neighbouring allocated sites include the block on the immediate opposite side of Whymark Avenue, "SA15 (Land Between) Westbury and Whymark Avenues" in both the adopted Site All0ocations DPD and most recent draft Wood Green AAP. The almost identical allocations identify the site for redeveloped town centre uses and residential, but with a "landmark" (SA) or "gateway" (AAP), with an acceptance that this could be the site for a tall building, although dropping down in height to retained neighbouring buildings. The allocation site covers the Whymark Avenue frontage up to opposite the Bury Road corner and envisages all the existing buildings on the site could be redeveloped. In the opposite direction, beyond Sainsbury's, Allocation Site SA13 (draft WG SA12) "Bury Road Car Park" sits behind but does not include the retail frontage; this allocation is	

	also similar, but commits to retaining to higher quality original late 19th century / early 20th century retail parades; a pair of short terraces originally built as part of the Noel Park estate, either side of the stub of Dovecote Avenue, and Cheapside Parade beyond. Under this allocation, Dovecote Avenue's severed connection to Bury Road would be reinstated as a further "laneway", with complimentary development to that on SA14, improving its relationship to retained High Road frontage, on the remainder. Following the last Wood Green AAP public consultation, changes to WG SA12 (but not to WG SA 14) are being contemplated, potentially including retention of some existing buildings on that site. 15. 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. 16. 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 The High Road and Bury Road but otherwise there is little local greenery in the setting of the site. Principal of Development & Masterplan 17. The principle of development with the uses proposed is established by the Site Allocations. 18. In accordance with those allocations, the applicants include a Masterplan Approach [section 4 of their Design & Access Statement] for the rest of the allocation site (that is the Sainsbury's etc. site and the former M&S site to the north-east and the smaller retail units to the south west of this application site), as well as the SA15 "Westbury & Whymark Aves." allocated site on the opposite side of Whymark Ave., connecting the site to Turnpike Lane Station. This shows how these proposals for this site can fit in with the actual real proposals for the neighbouring site to the north-west (the "M&S Site", subject to a previous application as mentioned above), that a similar pattern of development to this proposal could successfully develop the rest of this and neighbouring Allocation Sites.	

	19. The applicant's Design and Access Statement also explains how their masterplan has evolved in tandem with the masterplan for the "M&S Site", which had 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 with taller blocks along the street edges, as well as creating a new route through and public space within their site, the proposals for the neighbouring site being a "podium" of similar height to existing surrounding heights, with blocks of greater height set back from the site edges. Both contrasting approaches are reasonable but contrasting responses to contrasting site conditions within their respective sites, but both proposals have evolved, in a collaborative Masterplanning exercise, to accommodate their differences. 20. One difference is that this site will propose a "Laneway" crossing the site, in accordance with the Site Allocations requirement, unlike the M&S site proposals. The site is over 2x as large as M&S, so has more room to accommodate a Laneway. The applicants for this application, and those of the M&S 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. It is also important that the currently severed stump of Dovecote Avenue is repaired and 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). This application site is nevertheless an improvement to the M&S site application in including the laneway, in accordance with the allocation site requirement. It would be highly regrettable and a huge missed opportunity for both sites to be redeveloped without at least one laneway being created, and this proposal would appear to be the most viable proposal to create such a laneway. 21. The other major difference in approach is between the two approaches is that between "podium-and-blocks" in the M+S site and "taller-blocks-on-the-street" model here. The two proposals represent alternative but equally viable development patterns. Both sites and the whole of the site allocation could be developed in either a podium-and-blocks or a taller-blocks-on-the-street pattern, but as is made clear in the allocations, towards the northern end, height of blocks on the High Road would have to drop down to the existing 3 storey retail parades further north. The use of different approaches provides this transition in the allocation and the different approaches can be accommodated in the designs of the two. If the M+S Site and Sainsbury's Site followed the same design approach as this scheme, the block on their parts of the High Road frontage would have to step down in height gradually across their frontage form probably a floor lower than this site at its southern boundary, 7 storeys, to a floor higher than their northern neighbour at the northern end of	

	the Sainsbury's site, 4 storeys. Corners and end elevations in both schemes, including fenestration, have been designed to accommodate the neighbouring proposal. 22. Towards the back of this proposal, set-back upper floors leave a three-storey residential elevation along Bury Road, creating a much better relationship to the houses opposite on Bury Road than the existing blank service elevations and service yard. The proposal rises two floors set back from the street elevation, and the ends of the blocks either side of the laneway rise another two floors, considerably further set back. This would match closely with the proposals for the M+S site, which has almost identical three storey townhouses on the frontage, but with much taller blocks further set back. 23. 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 building will be something of a transition from the seven-storey frontage of this proposal to the three-storey frontages of the buildings further up, including the existing former M+S and if it is redeveloped in line with the current appeal proposal, it's intended three-storey frontage and well set-back higher residential block. 24. To the south-east, the masterplan for this proposal includes a potential complimentary development for the corner site at the junction of the High Road and Whymark Avenue, which would be a simple continuation of their High Road fronting block, which could also turn the corner and join up with the proposed hotel in this application. They then also show the potential for a higher block on the corner site, allocation site SA15. This shows how the proposal successfully integrates with and sets a design pattern, form, height and quality benchmark for intended development to the south. Pattern of Development & Streetscape Character 25. As noted above, the pattern of development of the proposal can be described as of larger scaled blocks lining and defining streets and spaces of an urban scale. They propose buildings of an urban scale on the High Road frontage, with a tall retail ground floor, six floors of residential middle and a set-back attic floor. The context opposite is of retained older retail parades, but these are of a consistent good quality, whereas the application site and the rest of the allocated sites along this north-eastern side of the High Road are of no great quality. They will also be sunny and not block day and sunlight from the High Road except early in the morning. 26. The three main street frontages of the application site, whilst streets of very different character, are all designed in an appropriate, street, pedestrian and neighbour friendly manner. The High Road frontage would extend the strong retail parade 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, equivalent to a two storey height, with residential maisonettes, set behind large recessed balconies, over three doubled floors above, with a set-back 7th floor. The Site Allocation requests that the building lie be set-back to create a wider pavement, but as this site is between two smaller properties that are unlikely to be redeveloped, it is considered more appropriate that these proposals continue the existing building line, with widened pavement around the entrance to the laneway and the main contribution of additional public space being the generous public courtyard. 27. The more residential character of Bury Road would be repaired with this development, replacing the existing service yards and blank facades with an active residential frontage, with front gardens, residential front doors and a stepped 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. 28. The hotel frontage onto Whymark has a taller and predominantly glazed, active ground floor (opening onto the hotel reception / bar / restaurant), with bedroom accommodation on 6 floors above, dropping two floors to a five storey all residential elevation onto Bury Road. The bedroom floors are arranged as groups of two floors, with the top two, which face only onto Whymark, as a sharply contrasting, roof-like structure, set back, in contrasting light-weight metal cladding and zig-zag profile. This will have a distinctive form, as befits a hotel, which should seek to stand out from surrounding residential and commercial blocks, whilst mediating to some degree between the High Road and residential side streets. 29. At the centre of the site, the proposed new “laneway” and new public square provides the fourth streetscape contribution of the development and a new piece of public realm potentially of tremendous public benefit. The laneway, consisting of the passageway from the High Road to the square, the square itself, and the passageway from the square through to Bury Road, would make a significant contribution to improving the interconnectivity and permeability of the local street network, providing a useful, more direct route from the residential “hinterland” to the facilities of the town centre, a more gradual transition from the busy, anonymous High Road to the quieter residential hinterland, secondary town centre frontage suitable for less retail focussed town centre uses which	

	often create more, better jobs and provide additional services and a “breathing space” with seating and greenery off the busy primary frontage. Heights around the square drop from seven storeys on the High Road side to five on the Bury Road side, with three storeys only immediately either side of the passageway through to Bury Road. Overall Height, Tall Buildings, Impact on Views 30. This section considers the design of the taller elements. The height of the taller elements of this proposal itself falls below the normal threshold of tall buildings, which is adopted in the councils’ Local Plan Strategic Policies (2013) as 10 floors or over; the highest elements of this proposal are of 8 storeys. 31. The tallest height is only located within the centre of proposed blocks; on the High Road and square facing blocks (Blocks A, B, D & E), the only places where there is a 7th floor, that top floor is set in from the sides of by 1-2m, and substantially set back at the ends, by at least 6m, creating large roof terraces. Height further drops to the Bury Road side in two steps of two storeys each to five and then three storeys. The images and renderings produced demonstrate that the taller elements would be less visible (often invisible) from immediately surrounding streets. 32. 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) barely rises high enough to be visible in this view; from the viewpoint the proposal would just be visible over the roofs of houses in the foreground, whilst the whole of the existing view of Alexandra Palace would remain visible, and no more obstructed than at present. 33. 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 neighbouring 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, Coleraine Road (D&AS p92). 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.	

	34. The proposals would replace existing buildings of a poor architectural quality, that are of an exceptionally low height, lower than the better 3-4 storey Victorian / Edwardian buildings of the parts of the High Road that will not change, and of an unsustainable low height and lack of site intensity given the need for housing and improved town centre opportunities, with taller buildings of a much better quality of design that are still of a human scale. The proposals represent a step up in scale compared to existing buildings on the site and its immediate vicinity, but this is to be expected on a busy high street, in a site identified as suitable for comprehensive development, in a designated Metropolitan Centre. The plans for the M&S Site will also be of a similar height, and the council has previously agreed, in the adopted Site Allocation DPD (2017), that there could be buildings of this height on the site and that heights could step up to a taller building on the High Road / Westbury Avenue corner, beside Turnpike Lane. Elevational Treatment, Materials and Fenestration, including Balconies 35. The applicants overall elevational treatment strategy, including materials, fenestration and balcony distribution, has been determined by a specific response to different contexts, with distinct strategies for the High Road, the public courtyard, Whymark Avenue (the hotel) and the Bury Road blocks. Each is treated with a distinct character in itself, and elements that meet the ground or the sky, turn corners and form links are further distinguished, with distinct bases, tops and links. Functions are also expressed in this way, with, for instance, a distinct elevational treatment and material palette for retail and commercial units and the hotel. 36. As the applicants explain, this approach has advantages in creating a unity across the development along with a contextual approach to specific locations, such as using a complimentary brick palette and fenestration pattern to the existing houses opposite along Bury Road. Specifically here, the ground floor maisonettes form a distinct townhouse form, with front doors off the street behind front gardens, domestic scaled fenestration, repeated bays and a darker red brick palette, complemented by green glazed brick highlights, all picking up on characteristic elements of the Noel Park Estate housing opposite. The palette varies with a lighter brick where the elevation line steps back from 2nd floor up; balconies and roof terraces for the flats of these levels appear here, behind either solid brick parapets or dark painted metal balustrades. 37. The hotel forms a transition between the residential architectural treatment along Bury Road and the town centre treatment of the High Road. The brick materials palette and scale of fenestration relates to the domestic context of the Noel Park Estate and the speculative Edwardian terraced houses further down Whymark Avenue, whilst the repetition of identical windows, largely	

	glass ground floor base and block scale elevational composition expresses the hotel function and relates more to the scale and monumentality of a town centre location. The small number of ground floor bedrooms, all around the corner into Bury Road, have raised window cills to give them privacy from passers-by, whilst the corner is marked by a larger window onto the hotel managers' office. There are no balconies in the hotel block. 38. The High Road elevations are designed to have a strong urban identity of their own, as befits a major transformation of a large stretch of town centre frontage, part of a longer stretch of anticipated redevelopment. The design also goes with the site allocation and AAP acceptance that the north-east side of the High Road at the Turnpike Lane end will be transformed into a modern, higher density urban town centre, whilst the opposite, south-western side of the High Road will have little change. Therefore, contextualism is less important than accommodating functions, elegantly and effectively, and in this the elevational treatment of this part of the proposal is exemplary. Retail frontage is distinct, creating a lofty, highly transparent shopfront base, with a strong frame that clearly provides and distinguishes a signage zone that also acts as a clear separation of retail from residential above. The residential floors then clearly express the duplex flat layout, and set accommodation back from the street frontage of recessed balconies, bay windows behind a screen. Elevationally this forms a gridded façade, of an urban scale and orderly repetition, containing within the frame richer, more varied, more domestically scaled elements contained by the frame. These comprise a projecting bay window, with an upper level balcony behind, screened by a "curtain" of aluminium fins, a central panel of pigmented, textured concrete and balancing floor to ceiling windows, with access to the main lower level balcony from both sides. The concrete panel provides warmth and colour to the overall elevation and for residents using their balcony, whilst the screen in front of the bay/upper balcony and the fins that from the sides of the frame provide privacy from neighbouring flats and from the street, unless they are directly opposite. 39. Of equal significance to the main elevations, the way the two High Road blocks turn corners is significant and carefully composed in both the entrance to the laneway and where it meets neighbours. A corner element of tall thin windows establishes a scale and softens each corner, whilst the light pigmented concrete of the High Road framing elements is carried through as floor height panels of tall, thin proportions, with a dignified, stone-like appearance. These flank elevations accommodate occasional windows onto the laneway, giving passive surveillance and a third aspect to those flats, whilst avoiding overlooking by off-setting, whilst to the two end flanks, these elevations will look high quality if left with no neighbours built up against them, but could equally be built up to.	

	40. The courtyard / square at the heart of the development also forms a tradition between residential Bury Road and the commercial High Road, but also importantly forms a distinct space in its own right, as a place to stop and sit and that it accommodates workspace units. The elevations of the blocks otherwise facing Bury Road and The High Road follow the elevational compositions of those blocks, but the "link blocks" to the north-west and south-east of the courtyard have a distinct identity of their own, of light coloured metal cladding with alternating solid metal and clear glass balustrades to balconies. Around the square, this sits over a concrete walled base housing business units and residential entrances, taking the town centre identity and materials palette from the High Road into the courtyard, intended to be a lively extension to the town centre. The residential elevations above will form a transition between those facing the High Road and the brick architecture of those facing Bury Road. The alternating clear and solid balcony materials will provide each flat with contrasting balconies; one with more light, but more visible, the other providing greater privacy and hiding of clutter. Elevations onto the two private communal podium gardens follow the same pattern as those onto the central square, only without the ground floor concrete base as there is no public access to these. Residential Quality (flat, room & private amenity space shape, size and quality) 41. All flat and room sizes comply with or exceed minima defined in the Nationally Described Space Standards, as is to be routinely expected. 42. Similarly, all residential units are provided with private amenity space in compliance with or better than London Plan and Mayoral Housing SPG requirements, in the form of balconies or roof terraces. All the flats in Blocks A & D, lining the High Road, have one balcony overlooking the High Road and another on the more private side overlooking the central square or one of the private podium gardens; they have either solid masonry or aluminium fin balustrades, giving them privacy and hiding clutter. Flats in blocks B & D have two balconies onto the central space or podium gardens, with privacy provided by a solid lower part to the balustrade. Flats in Blocks C and E have either inset balconies off the Bury Road street side or projecting balconies onto the interior spaces like those of B & D. The townhouses on Bury Road have private front gardens, and most have a 1st floor private terrace onto the courtyard or one of the podium gardens. The flats on the top floors of all blocks have larger roof terraces. 43. All flats would also be able to use a variety of private communal external amenity spaces; the two large central podium courtyards incorporating children's playspace will be accessible to all residents of Blocks A and D and quieter, sunlit roof terraces of a more "adult" appeal to Blocks B, C,	

	E and F. The houses on Bury Road would not access these but they have their own front doors off the street, accessed through small front gardens. All flats and townhouses, and indeed the rest of the general public, neighbouring residents, workers and visitors, would have access to the amenity space, including doorstep children's playspace, in the courtyard. 44. 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 these streets, they will not have a face close to due north facing. There are single aspect flats within the scheme; 70 of the 197 units, but that is a small proportion of the total and includes none with purely north or purely south aspects. Those single aspect flats facing into the courtyard and podium gardens all benefit from projecting balconies, allowing angular views in a different direction, and greater quantities and variety of day and sunlight, whilst their single aspects are north-westerly or south-easterly, which will provide good day and sunlight outlook with protection from the greatest danger of overheating. 45. In general, the quality of residential accommodation proposed is consistently high, and notably with no external visual distinction or difference in quality between housing of different tenure or affordability. Daylight, Sunlight and Privacy / Overlooking of Neighbours 46. 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…" 47. 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". 48. 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 of the houses on the opposite side of Bury Road, the only affected windows are mostly ground floor, and only those directly opposite; they would lose a noticeable amount of daylight, to below the 27% Vertical Sky Component (VSC) recommended in the BRE Guide, but mostly to the 18-21% range, which is considered good by London standards. They would nearly all retain adequate sunlight access and as these houses are dual aspect with unaffected rear, will not be significantly adversely affected. The houses on Whymark are all unaffected (except one window), but the flats, which all face the development would lose noticeable amounts of daylight. However, these are part of another Allocated Site and can be expected to be redeveloped soon. Upper floor windows on the High Road facing the proposed development (generally of unknown current use but all in principle suitable to be residential) would lose noticeable amounts of daylight, but they currently receive very high amounts (well over 27% NSL) and would retain very good levels in the 20-24% range. 49. 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, 501 of 597 rooms (84%) would receive daylight of or over the BRE Guide recommended levels. Of the rooms that do not meet the daylight levels recommended in the BRE Guide, 24 are bedrooms, 72 living/dining/kitchens, of which 43 would meet the recommended levels for living/dining rooms. 50. The one area where these proposals fail to meet the BRE Guide recommendations from a day or sunlight point of view is regarding sunlight to open spaces. The Guide recommends that external amenity space should be sunny, and defines that as at least 50% of their area receiving at least 2hours of sunlight at the equinoxes. The central public courtyard and two first floor private communal podium fall below that recommendation, which is not surprising as they are nearly surrounded by 5-7 storeys of building; the central space having just the two narrow laneways to the north-east and south-west, the south-eastern podium having a narrow gap at its southern corner and the north-western podium a wide but north-west facing gap to the neighbouring M&S site. However, they will all receive some sunlight; the applicants' architects and landscape architects have carefully designed the central courtyard around the late afternoon and evening sun it will receive, the southern podium will receive a "burst" of mid-day sun, ideal for young families, and they are designed with planting to cope. The applicants' consultants also show that all three will receive generous amounts of sunlight in the summer, covering the 4 months either side of the solstice, when the sun is higher in	

	the sky and people are more likely to be outdoors for longer. There are also four private communal roof terraces that will receive year-round generous sun, as will most of the residents' private balconies. 51. 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. 52. 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 53. This proposal is a well-designed redevelopment of a large and 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. The proposed blocks in the development are all well designed and proportioned, in distinctive, contrasting yet appropriate complimentary and contextual materials. 54. In what is probably the stand-out, impressive, innovative contribution, the proposals include a hugely convincing solution to the site allocation requirement for a "laneway", in the form of an animated, landscaped public courtyard providing a connection from the residential streets behind to the High Road, a transition between the hustle and bustle of the High Road and those quieter residential streets, secondary frontage suitable for employment uses and a "dwell-space" providing outdoor seating and playspace for shoppers, workers and residents rest, recreation and social interaction. 55. As well as retail and employment, the proposals include a convincing and attractively	

	designed hotel, providing employment, secondary frontage and transition on the other street connecting the High Road to the residential hinterland. The main bulk of the development over the retail and employment use contains a significant quantum of new housing in a mixture of sizes, tenures and affordability, yet all to good amenity standards. 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. 56. Finally, these proposals have been masterplanned and engaged in collaborative design with immediate neighbours to ensure it would complement and be coordinated with potential 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.	
Transportation Officer	Site Location and Context The development site is located at 22-42 High Road, formerly occupied by BHS. 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 in 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 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, and national rail services available from Hornsey 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'.	Included in S106 and conditions

	It should be noted that the site is currently subject to Crossrail 2 safeguarding, and has been identified as a proposed worksite for the Turnpike Lane route alignment option. 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, the addendum necessitates that disable car parking provision is provided for disabled employee, and provision for disabled visitors. 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 of the residual highway and transportation impacts of the development is considered to be acceptable. The TRICS sites used to derive the trips rates for calculating the trip generation of the proposed development were approved by the Council a part of the Transport Assessment Scoping Report.

The baseline (existing) vehicle trip generation of the site is 52 two-way trips daily. The baseline AM and PM peak vehicle trip generation are 6 and 4 two-way trips respectively. The Transport Assessment explains that the nature of the existing retail use is such that it is not a primary trip generator to the town centre, and that people are likely to do so as part of an existing trip. It could be argued that some public transport trips would be generated by the existing site but included this would not materially affect the overall net public transport trip generation for the site. In fact, omitting the baseline public transport trip generation would show a higher net public transport trip generation for the proposal, and thus presents a more robust assessment.

The proposed trip generation of the site, including the residential, hotel and retail use is presented in the table below. The assessment finds a proposed vehicle trip generation of 7 and 9 two-way movements in the AM and PM peaks respectively. The predicted trip generation for public transport is 94 and 69 two-way trips in the in the respective AM and PM peak periods, which breaks down as 71 and 45 two-way underground trips in the AM and PM peaks respectively, and bus trips of 23 and 22 two-way trips for the AM and PM respective peak periods.

Table 1: 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	2	4	7	4	4	9	86	91	176	
	Walk	14	44	58	28	21	48	298	312	608	
	Public Transport		23	71	94	47	21	69	306	296	603
	Train/Underground		17	55	71	31	15	46	208	200	407
	Bus/Tram/Coach		6	17	23	16	6	22	97	96	187
	Cycle	1	14	15	7	1	8	22	26	50	
	Total	63	205	268	133	68	201	1,017	1,021	2,031	

In terms of the net trip generation (i.e. comparison of the existing with the proposed) the assessment shows a net vehicle trip generation of nil two-way trips in the AM peak period and 5 two-way trips in the PM peak period. There is a net increase in the daily vehicle trip generation of the proposal but these trips occur outside of the peak traffic periods and therefore will have no significant consequences for the highway network. There is a predicted net increase in rail/underground trips, equating to 71 and 46 two-way trips in the AM and PM peak periods. The consequence to capacity on Piccadilly Line services through Turnpike Lane station is minimal. The net underground trip generation is 62 and 40 additional passengers in the AM and PM peak periods respectively, which in proportional terms equates to a respective 0.20% and 0.12% of total capacity (30,780 during the AM peak and 32,148 during the PM peak) of services during the AM and PM periods. The impacts to rail services at Hornsey Station is minimal, with 9 additional passengers through the station during the AM peak and 6 additional trips during the PM peak. The impact on bus services is an additional 23 and 22 two-way trips in the respective AM and PM. The total capacity of bus services is 5,952 (93 buses) during the AM and PM peak periods. The net development bus trip generation represents 0.0038% and 0.0037%. The impact on bus capacity is therefore insignificant.

Table 2: 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	-4	4	0	3	2	5	67	69	136
Walk	14	44	58	27	21	49	296	312	608
Public Transport		23	71	94	47	21	68	306	296	603

Train/Underground		17	55	71	31	15	45	208	200	407	
Bus/Tram/Coach		6	17	23	16	6	22	97	96	187	
Cycle	1	14	15	7	1	8	22	26	50		
Total	63	205	268	133	68	201	1,017	1,021	2,031		

In summary, the Transport Assessment has demonstrated to the transport officer's satisfaction that the additional trips generated by the development can be accommodated within the capacity of the local public transport services with no detriment. No material impacts on the highway impacts will be created.

Pedestrian/cycle and public realm environment
There are three (3) local cycle routes consisting of routes 54, 79 and 56, in the proximity of the development. 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.

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 improved pedestrian and cycle routes and 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 comprehensive scheme encompassing the entire length of Bury Road. Such a scheme for Bury Road will need to be delivered in phases, and will depend on the timing of developments and the level of funding that can be secured.

Access arrangements
The principal pedestrian accesses to the commercial use will be from the High Road, with access also being afforded via the new pedestrian route through the development. The residential and hotel element will be accessed mainly from Bury Road but the new pedestrian and cycle link through the site makes it possible to access these uses from High 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 need to be amended. Car parking provision The proposal includes a total of 14 accessible car parking spaces on-site. These spaces will be allocated thus: 11 no. spaces to the residential use and 3 no. spaces foe the hotel use. No dedicated parking spaces are provided for the retail use. The car parking provision for the family size units are below the 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 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 and 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 controlled parking zone, residents will be eligible for visitors parking permits. In accordance with Policy 3.8, the proposed development should include a total of 19 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 19 spaces. For the reasons set out in the Transport Assessment, i.e. the ground floor is limited due to the provision of a pedestrian route that permeates the site and public realm space. Moreover, the flexible workspace and retail units further constrain the amount of space available for car parking. 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 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 Car Parking Management Plan (CPMP). 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 control	

	hours than the Wood Green Inner CPZ and may suffer from some residual car parking pressures, to that end we will 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 note 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 350 long-stay secure cycle parking spaces and 38 short-stay spaces visitors to the proposed uses. The short-stay cycle parking spaces are in the form of Sheffield cycle stands and located in the courtyard on the ground floor. These are publicly accessible. Long-stay cycle parking for the residential use are located within the core of each block but are predominantly at ground floor level and basement level. A small number of cycles will be accommodated at floors 1, 3, 5 and 7. It is intended that cycle parking for the retail use will be provided in the back of house areas within each unit. Cycle parking for the hotel is provided in a secure cycle store to the rear of the hotel. It is noted that the 5% of the total cycle parking provision will be suitable for non-standard bicycles. The cycle parking provision accords with the London Plan in terms of quantum. However, details of all cycle will need to be submitted to the Council for approval prior to implementation of development and a condition to that effect is sought. Delivery and Servicing It is proposed that all refuse and recycling associated with the development will be undertaken from Bury Road, which is part of the existing refuse collection route. This will be undertaken via the proposed loading bays in Bury Road or within the existing parking restrictions. It should be noted that	

	the Council is not approving the loading bay in Bury Road as proposed. This provision will be considered more closely as part of the design of a public realm scheme in Bury Road. The Council is keen to avoid Bury Road from becoming a service road. The Transport Assessment states that the management company will bring the bins to the kerbside in advance of collection. However, due to the amount of bins required the Council will need to be convinced that this is workable solution, and as such the Council is requesting the details of this arrangement to be set out in a delivery and service plan. The principle is generally acceptable but details of the pick-up, timings and frequency of refuse/recycling collection should be detailed in a Delivery and Servicing Plan (DSP). Deliveries to the commercial use and the hotel will be principally from the existing loadings bays (northern and southern bay) in High Road, with ad hoc deliveries from Bury Road. Concerns as to whether the capacity of the loading bays would accommodate the demand created by the development were raised with the applicant at the pre-application stage. This has been addressed through a survey and analysis of the loading bays, which shows that the loading bays (northern and southern loading bay) are currently operating at 22% and 33% respectively and therefore there is ample capacity to accommodate delivery for this development. Nevertheless, the arrangements for deliveries must be detailed in a Delivery and Serving Plan, to include 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). 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. Travel Plans The Council welcomes the submission of a Framework Travel Plan (TP) for the proposed development, incorporating the residential and non-residential elements of the scheme. 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 Travel Plan will need to be submitted to the Council for approval in writing, within six (6) months of first occupation of the development. S.106 Planning Obligations 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. Car-free Development 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. Travel Plan (Residential)	

	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 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 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. Control Parking Zone consultation CPZ 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. Section 278 Highway Act 1980 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 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 £772,821 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. Construction Management Plan. 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. 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. Reason: To promote travel by sustainable modes of transport and to comply with the London Cycle Design Standard. 2. Electric Charging Points 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. Delivery and Servicing Plan and Waste Management Plan.	

	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. <u>Additional comments:</u> As discussed, we can advise the applicant to have another think about how they might configure the parking differently to meet the uplift in cycle parking required by the GLA. I had a look at the plans and struggled to identify a location where these additional spaces can be accommodated. I note that the cycle parking provision includes a provision for non-standard bicycles such as cargo, adapted, bike with trailers and tricycles. The text at Para. 10.5.4 sets out that facilities for non-standard bicycles should be considered but Policy T5 does not specify the percentage. So one possible solution would be to remove some of the space provided for non-standard bicycles and convert these to standard spaces – in order to accommodate the 28 long-stay spaces required. As non-standard cycle parking takes us more space than standard, it might be possible to accommodate these additional 28 cycle parking spaces in the cycle stores at basement and ground level. The other solution, which I discussed with you earlier, is to provide the level proposed from outset but secure a provision as part of the "Parking Management Plan" and as a "Travel Plan" measure that the cycle parking utilization / demand be reviewed on an annual basis and where additional cycle parking (up to the draft London Plan level) is required, the space provided for non-standard bicycles can then be converted to accommodate these additional spaces. In any case, the applicant will need to produce a plan that shows where these additional 28 long-stay spaces can be accommodated. In regards to short-stay cycle parking, this could be a combination of spaces within the curtilage or in	

	the vicinity of the development. I imagine that some spaces can be incorporated into the public realm scheme for Bury Road but perhaps some of the short-stay spaces can be accommodated in the residential car park? There appears to be some space between the disabled car parking spaces (Block E, D and F) and the external wall of the retail unit where a cycle sheltered can be provided. There seems to be sufficient space along the Whymark Avenue frontage to accommodate some short-stay spaces. We will need to seek appropriate contributions to pay for cycle parking on the public highway. I am happy for the applicant to contact me directly to discuss the above or other options that would address the GLA's requirements. <u>Final comments on cycle parking amendment:</u> This is ok. As long as they are confident that they can accommodate the additional cycle parking space we can secure the number required by condition. They seem to be indicating that all cycle parking – short and long stay is being accommodate within the curtilage of the site. If this is the case, we can ignore the option to look at included some in the public realm.	
SuDS Officer	We've taken a look through the drainage strategy for this proposed development and in general the site doesn't offer too much in the way of above ground SuDS solutions, therefore a below ground attenuation system is proposed. We can't seem to locate any drainage drawings to get a feel for the layout of the proposed drainage design, can we request drawings be made available to include overland flow routes across the site. We welcome the inclusion of Green Roofs across the development and permeable paving; we would prefer to see a deep substrate roof against the Sedum mat method, unless it can be justified. Other than those couple of points, the proposed drainage strategy looks Okay. <u>Second Comments:</u> We are satisfied with the additional information that has now been provided to support the drainage strategy for this proposed development.	Noted, amended and conditioned.

	There is a good balance of above ground and below ground SuDS solutions across the site, the strategy appears to be robust enough and can see no reason why this application cannot progress. <u>Final Comments (following comments from GLA):</u> Thank you for your email, we (LLFA) have reviewed the drainage strategy and the additional information that was provided by the applicant, the additional information has now addressed the comments raised in relation to SuDS selection from the hierarchy, climate change and storage, we are satisfied the criteria has been met. The site has been sensitivity tested for a 40% climate change, can we request another Haringey, pro-forma be completed to show the update from 30% to 40% CC. There will be the inclusion of deep substrate Green roof for control & Blue roofs that will provide storage, we accept there will be further development with regards to the SuDS solutions that will tie in with the architects and landscape architects plans for this proposal. We have no objection to this application progressing.	
Carbon Management	Energy Overall the scheme delivers an on-site carbon reduction of 37.70% against Building Regulations 2013. The energy efficiency measures that are to be installed on development will save 6.2% of the total carbon emissions. Savings from the community heating and hot water systems (CHP) are 30%. Carbon savings from renewable technologies (Solar PV) is 4%. In line with Policy 5.2 of the London Plan the remaining 63% will be offset. They have offered this value of the offsetting at £276,372.00 These measures, including the site wide heat network, makes the scheme policy compliant and should be secured through conditions and legal agreement. Heating Network 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 due to heating costs. The developer should reassess the need of implementing one as high operational costs could leave some residents in fuel poverty.	Noted, conditioned and S106

	But the Council should talk to the developers at the neighbouring site (44-48 High Road) to see if there are oppertunities to share the energy centre and the heat loads. This would give occupiers cheaper heating costs. And is expected in London Plan Policy 5.6. IT would also reduce operational costs for the occupiers. Action: To review the CHP solution. And if still demonstrated as an acceptable technology, that the system will be run at the cost equivalent of (to the resident) of a communal boiler system. And that the system will be operated in line with the Heat Trust accreditation. Action: To engage with the neighbouring development to see if an energy centre can be shared, and therefore greater carbon savings be delivered. To demonstrate that this option has been exhausted. Action: Include a planning obligation for the heating arrangements on the scheme to meet the Heat Trust standard (or equivalent) Action: Include a planning obligation for the heating arrangements on the scheme to be designed and constructed following the CIBSE / ADE Heat Networks Code of Practice Renewable Technologies While renewable energies have been installed (through the use of ASHP for the commercial units and solar PV) there is still roof space that has not been used to maximize the impact. And the policy objective (Local Plan - SP:04) has not been reached yet. Action: To review the solar installations on the site including numbers and locations. And to maximize the number of PV installations on the roof. Offsetting In line with Policy 5.2 of the London Plan the remaining 63% will be offset. They have offered this value of the offsetting at £276,372.00 It should be noted that offsetting is not secured through CIL, it is payable under s106	

	Action: To secure £276,372.00 through s106 for carbon reduction. Overheating Analysis The dynamic simulation has been undertaken. For both weather scenarios (current and 2020 weather scenarios) and found: Under the Current weather files • Residential: 6% habitable rooms fail to meet the requirement of CIBSE TM59 criteria • Communal Corridors: All pass the requirement Future climate 2020s • Residential: 53% habitable rooms fail to meet the requirement of CIBSE TM59 criteria • Communal Corridors: All pass the requirement Mitigation measures where then added to the scheme to address the overheating risk. These are: • Night cooling to failed bedrooms • Blinds are installed • Windows, with low-emissivity G-Value 40% • Mechanical Ventilation with Heat Recovery • Purge ventilation via opening windows/doors The model was then rerun and found: Current weather • Residential: 1% habitable rooms fail to meet the requirement of CIBSE TM59 criteria • Communal Corridors: All pass the requirement Future climate 2020s • Residential: 4% habitable rooms fail to meet the requirement Based on these simulations Carbon Management has the following points and actions:	

	Action: To confirm the locations in the scheme of the modelled units in the overheating assessment. This should be through drawings of each floor showing location and orientation. Action: To re-run the simulations but removing blinds. Blinds should only be included if they are fitted (and cannot be removed) to the development. Action: To demonstrate that the air quality (pollution) from the High Road will not impact on the internal air quality / spaces during openable windows on to the High Road. Action: To model the internal spaces for Nosie from High Road, to ensure that during the summer months when residents have to open the windows, that they are not impacted on by noise from the High Road and the shops and services located there. Action: To confirm the insulation standard being used on the community heating network throughout the building. Action: To demonstrate that the openable windows will get enough through flow of air. As single aspect units will not get any through flow. Action: Once all remodeled, to demonstrate that none of the units do not over heat. Sustainability The applicant has proposed to undertake a BREEAM Assessment and secure a “very good” outcome, in line with policy. But the applicant has undertaken this assessment under the 2014 edition, but the Council expects a BREEAM assessment under 2018 – which is the more recent version. There is no assessment proposed on the sustainability of either the residential units. But due to the mixed use of this scheme many benefits would be shared. This standard should be conditioned to be delivered.	

	Suggested Condition The development shall be constructed in strict accordance of the details so approved, and shall achieve the rating of BREEAM Very Good (New Construction 2018) 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. Biodiversity There are limited biodiversity benefits offered by this development. Living roofs and living walls, greening of public realm, or bird / invertebrate boxes should be considered. Green infrastructure offers health and welling benefits, improvements in air quality, and climate change adaption alongside biodiversity improvements. Action: In line with Policy SP:13 the Council should secure biodiversity improvements through the design of the scheme. Sustainable Transport More can be done on this, and the travel plan proposals need to improve. I am sure Travel Planning will be very constructive on this.	

	Parking and EVs There are 14 disabled parking bays as part of this development. 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 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 a) The applicant will deliver recharging infrastructure in 100% of the residential parking bays on site. This shall be maintained and fully operable thereafter. b) 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. <u>Second Comments:</u> Requests further information <u>Additional Comments:</u> Issues that will picked up the conditions: - Overheating model in Block A to demonstrate that the units do not overheat in current weather patterns, and have a plan (if needed) if they do overheat in the future:	

	- Management Plan to ensure that in the future if the retrofitting of cooling measures are required. That the residents have a pathway to ensure swift installation of measures; - Standard of the Living Roofs; - Post Construction BREEAM (2014) certificate for the non-domestic part of the development; and - Management Plan for who gets access to the 20% EV charging points. Overall The scheme overall delivers a 36% carbon reduction beyond Building Regulation (2013) which in line with the policy expectation. This is achieved through lean (energy efficiency) measures, clean (energy generation), and green (renewables) measures. Under Lean Measures The scheme will use greater energy efficiency standards, such as improvements in glazing energy efficiency, thicker wall and roof insulation. These measures deliver a 6.6% improvement which is in line with similar buildings. Under Clean Measures The scheme will house a single energy centre that has a Combined Heat and Power (CHP) Unit that serves the whole development with all its hot water needs. This will work due to the hotel complex which will require hot water throughout the day. The site network will be conditioned to show the operating parameters of the network, and how at a future date it could be connected into the wider Wood Green District Energy Network. This wider network will deliver further efficiencies and carbon reduction. This site wide network will deliver a further 30% reduction in carbon. The design of the connection to the Wood Green network will be secured via condition, and the scheme will be required to use best endeavors to connect. Under Green Measures The scheme will deploy a number of PV Solar Panels on the scheme. Ensuring that all appropriate roofs are used to generate power. This will generate at least a further 4% reduction in carbon. The final figure will be known at final design stage and this will be confirmed to the Council and secured	

	by condition to ensure that maximum opportunities for Green energy generation are secured. The rest A remaining 153.54 tonnes of Carbon which will emitted by the residential units will be offset by the developer. And a contribution of £276,372 will be secured by the legal agreement to deliver carbon reduction projects in the borough. <u>Final Comments:</u> I think that I missed this point in my comments. We focused on the: “talk to the developers at the neighbouring site (44-48 High Road) to see if there are opportunities to share the energy centre and the heat loads. This would give occupiers cheaper heating costs. And is expected in London Plan Policy 5.6. It would also reduce operational costs for the occupiers.” But this was pushed back by both developers. You are right though that the future design and connection of their system should be done in a way to allow for future connectivity if the business case can be made. Therefore. to capture this I suggest the following is added to the conditions / legal agreement (it is based on a tweaked existing condition). : Condition Details of the hot water facility and associated infrastructure, which will serve heat and hot water loads for all the units on the site. This shall provide for no less than 28% total C02 reduction (from Building Regulations 2013) shall be submitted to and approved in writing by the Local Planning Authority 6 months prior to any works commencing on site. The details shall include: a) location of the energy centre; b) specification of equipment and heat loads across the site; c) flue arrangement and gas dispersal; d) operation specifications (in line with CIBSE ADE Code of Practise and London Heat Manual); e) management strategy for the community heating system (delivery plan for equipment,	

	maintenance and renewal, and heat and power sales arrangement, consumer protection); f) the method of how the facility and infrastructure shall be designed to allow for the future connection to any neighbouring heating network (including the proposed connectivity route to the edge of the site, space in energy centre of heat exchangers and pumps, reserved conduit space through structure to deliver the pipework etc) Once these details are approved 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. The hot water facility and associated agreed infrastructure shall be delivered in accordance with the details so approved, installed and operational prior to the first occupation. And shall be maintained as such thereafter. REASON: To ensure the facility and associated infrastructure are provided and so that it is designed in a manner which allows for the future connection to a district system in line with London Plan policy 5.7 and local plan SP:04 and DM 22.	
Housing	With regard to the podium gardens it depends on the management of them and what the design / spec / management strategy are. If the Council negotiates acquisition with them, then like previous schemes we will resolve this and tie it up in the Heads of Terms for the acquisition. I suspect if they think it might affect long term sales / marketing then they may want to manage it and outsource the contract, in which case the final design will be a bigger issue but that isn't something I would expect them to finalise at this stage. Peter The other two things (sort of three things) they would expect us to explore are: • can the rented homes be social rent? • can the LLR be with no sale, just rent? • could the LLR be changed to rented (social)	Noted and the affordable housing has been adjusted accordingly.

	I assume the s106 will give us first refusal, then I suppose if members and senior officers are prepared to have a discussion then we should explore this option with the developer.	
Pollution	Air Quality 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) 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. The following documents have been submitted with the application: • An Air Quality Impact Assessment Report, 22-42 High Road, Wood Green, London referenced 7669 AQ final rev3 and dated September 2018, compiled by Phlorum Ltd and • The Transport Assessment referenced WHIT/16/3508/TA01, for 22-42 High Road, Wood Green Proposed Mixed Use Development by RGP dated September 2018. The comments from TfL were generally positive and the principle of the development and servicing strategy were accepted. However, it was requested that a loading bay survey should be undertaken to confirm sufficient capacity is available within the existing loading bays on High Road to serve the retail aspect of the	Noted and conditioned accordingly

	development. Air Quality Impact Assessment: Owing to the highly accessible location the proposals would be predominantly car free, except for disabled parking associated with the residential and hotel uses. Delivery and servicing activity would be accommodated from existing loading bays on High Road and a repositioned loading area on Bury Road. The main pollution sources in the vicinity of the application site are vehicles travelling on the local road network, primarily High Road (A105). The residential energy centre includes 3 CHP units (SAV XRGi20) and 2 Boilers (Wessex Modumax MK3 254/508V), whilst the hotel energy centre includes 2 water heaters (Andrews SupaFlo SF63 EVO). The residential energy centre will meet the residential heating and hot water demand as well as the preheating demand for the Hotel Water Plant. The estimated annual energy use is 1076.1MWh/year. The estimated annual energy use for the Hotel Hot Water Plant is 476MWh/year. The proposed development will achieve air quality neutrality with respect to building emissions and transport emissions. 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. Find below my comments: • Choosing a dispersion model: it is stated in the Defra guidance LAQM.TG (03) that “the model chosen should be capable of taking into account all relevant emission sources within London, for example; line (major road) and area (minor road, domestic heating, individual boilers, commercial	

	etc.) sources. The application should also be able to include point sources (i.e., chimney stacks) from nearby industrial sources. Where relevant the model should be able to determine the effect of height on air pollutant concentrations, if relevant for the planning application under consideration". The cumulative effect of emissions from the proposed and nearby industrial sources has not been considered or discussed in the report. • Details of the centralised energy centre for domestic heating and hot water should be provided to the local authority. Providing further details on actual installed combustion plant and emissions performance prior to full operation of the development is a requirement. • Please note that the 2017 data for LBH monitoring sites is now available for consultation. The report shall have regard to the most recent air quality predictions and monitoring results from the Authority's Review and Assessment process, the London Air Quality Network and London Atmospheric Emissions Inventory. Contaminated land: A Site Investigation Report 22-42 High Road, Wood Green, London, N22 referenced C14174A and dated September 2018 and compiled by ads Consultancy was submitted with the application. 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 from the potential historical use of electricity sub-station, made ground and off- site historical usage. The desktop search revealed that there is one (1) recorded potentially contaminative use recorded for the site, and a further twenty (20) within 250m of the site. Identified potential contaminant sources include: • The existing buildings may include asbestos containing materials (ACMs). The existing electricity sub-station in the service yard may be a source of polychlorinated biphenyl (PCB) contamination.	

	• Effluent from leaking drains/sewers would provide a contaminant source. • Contamination may be present within made ground including any remnant demolition rubble of the former buildings within the site. • Potential soil gas generated from made ground or natural organic soils. • Ground contamination migrating from adjoining sites. The proposals comprise the demolition of existing retail buildings and the construction of new commercial and residential units. Potential receptors including Human Receptors and Surface Water/Watercourses. The site lies within a Source Protection Zone 1 (Inner Catchment). A Source Protection Zone 2 (Outer Catchment) is also located 6m to the north-east of the site. The record for the site comprises the electricity sub-station in the northern corner of the service yard. An intrusive investigation work was undertaken within a service yard near centrally within the site (to the rear of Nos. 28 & 30), whereas areas of the retail buildings (occupied at the time of investigation) are be investigated separately at a later date. The results of the laboratory analysis (Table 5) indicate that one of the four samples of made ground tested contained an elevated concentration of benzo[a]pyrene that exceeded the respective screening values for the residential end uses. None of the results exceeded the respective soil screening criteria for a commercial/industrial end use. No asbestos containing material (ACM) was found during sample preparation prior to chemical analysis and visual evidence of ACM was not recorded during this investigation. Some evidence of hydrocarbon contamination was locally noted as dark grey staining and a hydrocarbon odour within the made ground in TP2, in addition to an iridescent sheen on the surface of the 'perched' groundwater standing at 1.10m depth in this pit on completion. No evidence of hydrocarbon contamination was encountered in the underlying practically impervious London Clay in TP2. No visual or olfactory evidence of hydrocarbon contamination was encountered in the remaining exploratory holes. Three return visits to monitor gas levels at this site were made in July and August 2017 to record the	

	concentrations of landfill type gases (methane, carbon dioxide, oxygen) in the standpipe installed within BH1A. Assuming a positive flow rate of 0.1l/hr, the results give a Gas Screening Value (GSV) of 0.00061l/hr. This GSV falls within the modified Wilson and Card Characteristic Situation 1, as defined by the Construction Industry Research and Information Association, CIRIA Report C665, 'Assessing risks posed by hazardous ground gasses to buildings This investigation may not have revealed the full extent of contamination on the site and appropriate professional advice should be sought if subsequent site works reveal materials that may appear to be contaminated. The report recommends that an intrusive investigation should be conducted including: The boreholes and trial pits of this investigation were restricted to the service yard in the northern quarter of the southern side of the site, and further ground investigation is yet to be undertaken across the remaining south and north sides of the site. It is recommended that the further ground investigation work should include TPH and PCB testing on the near surface soils and 'perched' groundwater in order to further characterise the site contamination. If water is encountered during the additional works, it should be sampled and tested. I recommend the following conditions: Contaminated land: (CON1 & CON2) CON1: Before development commences, other than for investigative work and demolition: a) Using information obtained from the Site Investigation 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.	

	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. Management and Control of Dust: 1. Prior to installation details of the gas boilers to be provided 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 (0%). Reason: As required by The London Plan Policy 7.14. 2. Prior to construction of the development details of all the chimney height calculations, diameters and locations must be submitted for approval by the LPA. Reason: To protect local air quality and ensure effective dispersal of emissions.	

	3. Prior to commencement of the development, details of the CHP must be submitted to a. evidence that the unit to be installed complies with the emissions standards as set out in the GLA SPG Sustainable Design and Construction. A CHP Information form must be submitted to and approved by the LPA. Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction. NRMM • 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. Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ • 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. <u>Additional Comment:</u> In theory, the side access to the balcony at lower level and a fully screened (using aluminum fins) upper floor is preferable to having openable windows directly on to the street. The Investigation of air quality with height and Air quality monitoring could be carried out to confirm that air quality improve with height as this is not always the case. Balconies and communal relaxation areas should be placed preferably away from polluted areas. If these options are to be progressed, mitigation measures should be considered including the adoption of non-openable windows to the polluted façade.	
Licensing	In terms of restaurant we have Tarshish on the High road which has the following hours: Live Music and Recorded Music Sunday to Thursday 1000 to 0100 Friday to Saturday 1000 to 0200 Late Night Refreshment Monday to Sunday 2300 to 0200 Supply of Alcohol Monday to 1000 to 2330 Sunday 1000 to 0100 The opening hours of the premises: Monday to Sunday 1000 to 0230 The problem for the Hotel is going to be noise intrusion for its customers from any late operating venue.	Noted and conditioned

	<u>Second comments:</u> Yes definitely, I would say the outside area should cease being used by 10pm at the latest.	
Noise Team	I have read the Noise Assessment Report produced by Cahill Design Consultants dated September 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 10dB below the existing background noise level (LA90 15mins) when measured (LAeq 15mins) 1 metre external from the nearest residential or noise sensitive premises. The applicant shall also ensure that vibration/structure borne noise derived from the use of 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 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); Time Area Maximum Noise level Daytime Noise 7am – 11pm Living rooms and Bedrooms 35dB(A) Dining Room/Area 40dB(A)	Noted and conditioned

	Night Time Noise 11pm -7am Bedrooms 30dB(A) With individual noise events not to exceed 45 dB LAmax (measured with F time weighting) more than 10-15 times in bedrooms between 23:00hrs – 07:00hrs.' 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 Vibration Whilst the vibration measurements were compliant with the requirements under BS6472, ground borne noise from the Piccadilly Line was re-radiated within the building as airborne noise. As this will be applicable to the proposed development the following condition shall apply; The building shall be so designed to ensure that the re-radiated noise is attenuated to 10dB below the recommended internal noise criteria outlined in BS8233:2014 for residential units and 5dB in commercial /retail premises. 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; 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)	
EXTERNAL		
Greater London Authority	**Strategic issues summary** **Principle of Land Use:** The proposal conflicts with the future ability to deliver a Crossrail 2 and is contrary to Policy 6.4 of the London Plan and Policy T3 of the draft London Plan. The redevelopment of this safeguarded site is not supported until such time as a decision is made by the Secretary of State on the Crossrail 2 alignment, or binding planning obligations are secured that prevent development of the site until the safeguarding direction is lifted, alongside an extended consent period. (paragraphs 16-20). **Housing:** 35% affordable housing by habitable room without public subsidy, which is uplifted to 40% through grant funding, including a 64LAR/36LLR tenure split in favour of affordable rent. This offer meets the Fast Track Route, provided that the rents and eligibility criteria accord with the London Plan and draft London Plan. An early review mechanism must be secured. (paragraphs 21-27). **Urban design and heritage:** Changes to the high road frontage, and to better activate the ground floor frontage of the hotel are required, as is a reduction in the number of units per core in buildings fronting the High Road, and improvements to the outlook of some flats are required. Conditions regarding accessible and inclusive design must be applied. (paragraphs 28-43). **Sustainable Development:** Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified. (paragraphs 44-49). **Transport:** The Council must secure a section 106 obligation to ensure the scheme does not conflict with the Crossrail safeguarding. Issues regarding the protection of London Underground assets, the availability of blue badge car parking, and an improvement of cycle parking must be addressed. (paragraphs 50-61). **Recommendation** That London Borough of Harringay be advised that the scheme does not comply with the London Plan for the reasons set out in paragraph 65 of this report.	Covered in S106 and conditions, or responded to accordingly.

Context

1 On 10 December 2018, the Mayor of London received documents from Harringay Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor will provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A and 1B(c) of the of the Schedule to the 2008 Order:

• *1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats"*

• *1B(c): "Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings – outside Central London and with a total floorspace of more than 15,000 square metres"*

3 Once Harringay Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site is situated at 22-42 High Road in Wood Green, and is occupied by a terrace of buildings ranging from 1-3 storeys in height fronting the High Road, and increasing to 3-4 storeys in height adjoining the sites rear (north-eastern) boundary shared with Bury Road. The site adjoins Whymark Avenue along a portion of its south-eastern boundary, and is bounded by three storey terrace buildings containing ground floor retail fronting High Road to its immediate north-west.

6 The site is located within the Wood Green Metropolitan Town Centre, Noel Park Regeneration Area and Haringey Heartlands/Wood Green Opportunity Area. The site is subject to a 2015 safeguarding direction, and identified as an area of surface interest for the future delivery of Crossrail 2 via the Alexandra Park/Turnpike Lane alignment.

	7 The application site is situated on the southern portion of the High Road, which is characterised by Victorian terraces of 2-3 storeys in height on its western side, and later developed retail units along its eastern side. The character of the high road is predominately that of established retail at ground floor, with residential and other uses situated above. To the south-east and north-east of the site, along Whymark Avenue and Bury Road, development is characterised by consistent groups of two storey Victorian terraced homes. 8 The adjacent A105 High Road forms part of the Strategic Road Network. The nearest section of the Transport for London Road Network is the A10 Great Cambridge Road which is located approximately 1.75 kilometres to the east of the site. The nearest station is Turnpike Lane which is located around 150 metres to the south and served by the Piccadilly Line. Wood Green Station, also served by the Piccadilly line, is located 700 metres to the north. The nearest national rail station is Hornsey, which is located approximately 700 metres to the west of the site. There are bus stops located directly outside the site on High Road, which provide access to bus routes 67, 121, 123, 184, 221, 230, 232 and 329. A further three bus routes can be accessed on Westbury Avenue within 150 metres of the site. Due to the ready availability of a variety transport connections, the site achieves a Public Transport Accessibility Level (PTAL) of 6b (on a scale of 0-6b where 6b is the highest). **Details of the proposal** 9 The proposal comprises the demolition of existing buildings, and the redevelopment of the site to provide mixed use development in a series of buildings ranging from three to eight storeys in height. The development will comprise: • 197 new residential units; • A new 134 room hotel, including public restaurant at ground floor; • 3,450 sq.m (GEA) of A1 retail floorspace fronting High Road; • 525 sq.m (GEA) of flexible workspace. 10 The proposed buildings are situated in a perimeter formation around a new internal courtyard, which provides a new ground level pedestrian linkage between High Road and Bury Road across the site. **Case history** 11 The scheme has been subject to pre-application advice, with an advice note (GLA4601) issued in August 2018. The pre application advice confirmed that, until such time as a decision is	

	made by the Secretary of State on the Crossrail 2 alignment, the redevelopment of the site is contrary to Policy 6.4 of the London Plan and Policy T3 of the draft London Plan and ought to be refused. 12 There is no other relevant planning history for the site. **Strategic planning issues and relevant policies and guidance** 13 The relevant issues and corresponding policies are as follows: • Principle of development *London Plan; Wood Green/Heartlands Opportunity Area Planning Framework* • Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG;* • Affordable Housing *London Plan; Housing SPG; Housing Strategy; Mayor's Affordable Housing and Viability SPG;* • Urban Design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;* • Inclusive Design *London Plan; Accessible London: Achieving an Inclusive Environment SPG;* • Sustainable Development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy;* • Transport *London Plan; The Mayor's Transport Strategy* 14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Haringey Development Management Policies DPD (2017), Haringey Local Plan: Strategic Policies DPD 2013 (as amended 2017), Haringey Local Plan: Site Allocations DPD (2017), and the 2016 London Plan (Consolidated with Alterations since 2011). 15 The following are also relevant material considerations: • The draft Haringey Wood Green Area Action Plan • The National Planning Policy Framework; • National Planning Practice Guidance; and • Draft London Plan (consultation draft August 2018, including suggested minor changes) which	

	should be taken into account on the basis explained in the NPPF. **Principle of development** Crossrail 2 safeguarding 16 The proposal has been reviewed against the latest Crossrail 2 project proposals and 2015 safeguarding directions. As advised at the pre-application stage, the scheme conflicts with the future ability to deliver a Crossrail 2 alignment via Alexandra Palace as well as the provision of a new Crossrail 2 Station and associated infrastructure at Turnpike Lane. The nature of the proposal does not lend itself to any form of temporary permission which could overcome that conflict. The proposal is contrary to Policy 6.4 of the London Plan and Policy T3 of the draft London Plan, which require development to provide adequate protection for transport schemes with priority given to securing the delivery of Crossrail 2. In the absence of binding planning obligations being secured that would prevent development of the site until or unless the safeguarding direction is lifted, alongside an extended consent period, the proposal cannot be supported until such time as a decision is made by the Secretary of State on the Crossrail 2 alignment. GLA officers would welcome further discussion with the Council and applicant on suitable planning obligations to overcome this issue. 17 Notwithstanding this significant in-principle matter, the following comments on the proposals are made for considerations should the safeguarding direction over the site be lifted. Land use 18 The site is located in the Haringey Heartlands/Wood Green Opportunity Area. Policy 2.13 and Table A1.2 of the London Plan identify this area as having a capacity to accommodate a minimum 1,000 new homes and 2,000 jobs, with scope for intensification in Wood Green Town Centre and improved transport linkages. London Plan Policies 2.15, 4.7 and 4.8 provide support for the improvement and enhancement of Town Centres within London as well as mixed use development. These principles are similarly reflected in the policies of the draft London Plan. Policy 2.3 of the London Plan recognises the pressing need for more homes in London and sets an annual target for Haringey of 1,502 additional homes per year between 2015 and 2025, which subsequently increases to an annual target of 1,958 homes in Policy H1 of the draft London Plan. 19 Policy 4.5 of the London Plan and Policy E10 of the draft London Plan support the provision of high quality serviced accommodation within opportunity areas and town centres in outer London outside of the Central Activities Zone. 20 Given the above policy context, the proposal for a residential-led mixed use development	

	incorporating the provision of active ground floor retail, flexible workspace and a 134 room hotel is consistent with London Plan and draft London Plan Policy. **Housing** Affordable housing 21 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing, having regard to its own overall target for the amount of affordable housing provision. In this instance, Policy SP2 of the Haringey Strategic Policies Document (March 2013) sets a borough wide target of 40% of new housing developed in the borough to be affordable. Policies 3.11 and 3.12 of the London Plan and policies H5 and H6 of the draft London Plan seek to maximise the delivery of affordable housing, setting a strategic target of 50% of all new housing being affordable. 22 The Mayor's Affordable Housing and Viability SPG, sets out a 'threshold approach' to planning applications, whereby schemes meeting or exceeding a specific threshold of affordable housing (in this case 35%) by habitable room without public subsidy, and which meet the Mayor's preferred tenure mix, are not required to submit viability information or be subject to late stage viability review mechanisms. 23 The scheme proposes 40% affordable housing on a habitable room basis, which equates to a total 74 units. Of these, 64% (45 units) will be offered at London Affordable Rent Levels, and the remaining 36% (29 units) will be offered at London Living Rent levels. The affordable housing statement submitted with the application has quantified that the scheme would provide a minimum of 35% affordable housing by habitable room without public subsidy, with an uplift in provision to 40% being achieved through the application of grant funding obtained through a Registered Provider partner under the developer-led route in the Affordable Homes Programme 2016-21. 24 The applicant's affordable housing offer meets the Fast Track Route requirements in terms of quantum, and the tenure split meets the minimum 30%/ 30% low cost rent/intermediate (it should be noted that the remaining 40% tenure split should be at the instruction of the Council). Therefore, the GLA would not require a viability assessment or a late stage viability review in this case; however, the Section 106 agreement should secure an early review mechanism, to be triggered if an agreed level of progress is not made within 2 years of permission being granted, with other requirements as stated for the Fast Track Route as set out in the Mayor's Affordable Housing and Viability SPG	

	Residential tenure and unit size mix 25 London Plan policies 3.8 and 3.11, as well as draft London Plan policy H12, encourage a choice of housing based on local needs with affordable family housing stated as a strategic priority. The scheme proposes 197 residential units of which 14% are 1 bed units, 57% are 2 bed units, 24% are 3 bed units and 5% are 4 bed units. The mixture of unit sizes is considered acceptable, noting the relatively high provision of 30% family sized units (3 or more bedrooms). Children's playspace 26 London Plan Policy 3.6 and draft London Plan Policy S4 set out the expectation that housing proposals should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Using the methodology within the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG, it is anticipated that there will be approximately 81 children within the development based on current housing mix. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 year olds playspace provided on-site as a minimum. As such the development should make provision for 810 sq.m. of playspace. 27 The scheme incorporates roof terraces and a central courtyard at ground floor, which will collectively provide 495 sq.m of designated play space for under 5's. Whilst the quantum of on-site provision for 0-5 year olds is accepted, the overall quantum of playspace provided falls below that required by the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG, therefore offsite contribution towards the upgrade of community play facilities in the surrounding area should be investigated with the Borough. The on-site provision of suitable play equipment for 0-5 year olds and any contributions to off-site play areas deemed appropriate, must be secured via planning conditions and the s106 agreement. **Urban Design** 28 The design principles of chapter seven in the London Plan and chapter three of the draft London Plan outline that all developments should achieve a high standard of design which responds to local character, enhances the public realm and provides architecture of the highest quality. Density 29 London Plan Policy 3.4 seeks to optimise the potential of sites having regard to local context, design principles and public transport accessibility. The application proposes a gross residential	

	density of 246 units per hectare and 741 habitable rooms per hectare. This partially exceeds the desired range outlined within Table 3.2 of the London Plan, which indicates an appropriate density of 45-260 units per hectare and 200-700 habitable rooms per hectare on schemes in an urban context. However, the London Plan notes that preferred density ranges should not be applied mechanistically. 30 Draft London Plan Policy D6 outlines that the higher the density of a scheme, the greater the level of scrutiny is expected, particularly of the qualitative aspects of design set out in draft London Plan Policy D4. Where development proposals exceed a residential density of 405 units/ha in areas of PTAL 4 to 6, the scheme must be subject to particular design scrutiny in respect to draft London Plan Policy D2, and must include a proposed management plan. 31 29 Given that the site has excellent transport links resulting in a PTAL rating of 6b (on a scale where 0 is worst and 6b is best), and is also within an Opportunity Area, the proposed residential density is supported, subject to satisfactory resolution of the outstanding design concerns raised in the following paragraphs. Massing and scale 32 The architectural approach is generally well considered. However, further work on the High Road frontage is required to better integrate with the surrounding low-rise streetscape and shop fronts. The applicant should investigate omitting vertical fins to balconies at higher levels on the high road frontage, and explore a range of materials and solid to void ratios on the façade, in order to soften the appearance of the development. 33 As requested at pre-application stage, a Townscape and Visual Impact Assessment (TVIA) has been provided which demonstrates an acceptable impact on the listed Turnpike Station building in the surrounding context. Design, layout and public realm 34 The concept of a new public courtyard at the heart of the scheme is strongly supported, and the overall layout and design of the scheme would provide an improvement to both the public realm and permeability of the site. 35 The ground floor layout of the proposed hotel in the eastern corner of the scheme should be amended to create a more active frontage at the corner of Bury Road and Whymark Avenue, through replacement of the proposed office with a more active use such as the proposed restaurant.	

	36 As advised at the pre application stage, standard 12 of the Mayor's Housing SPG outlines that each residential core should be accessible to no more than eight units on each floor. The proposed scheme contains 13 residential units per core in the phase 2 affordable housing component, which is unacceptable. It is acknowledged that there are some constraints imposed by the ground floor retail space limit the opportunity to provide a second core. However, the applicant should explore options to stagger access to these units from alternate floors, thereby achieving a maximum of 8 units per core. 37 Several units within the two residential blocks fronting High Road have very narrow separation distances to the adjacent units, which will result in poor daylight, outlook and potential overlooking issues. The applicant should seek to address this through changes to the scheme. 38 As advised at the pre-application stage, several units within the two residential blocks fronting High Road (blocks A and D) have very narrow separation distances to the adjacent units, which will result in poor daylight, outlook and potential overlooking issues. The applicant must address this through changes to the scheme. Inclusive design 39 The design and access statement submitted with the application addresses key points regarding inclusive access, including the building entrances and circulation spaces. Conditions of approval should be included with any consent to ensure the development will be delivered to meet the highest standards of accessible and inclusive design, in accordance with Policy 7.2 of the London Plan and Policy D3 of the draft London Plan. **Heritage** 40 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *'should have special regard to the desirability of preserving the building or its setting* *or any features of special architectural or historic interest which it possesses'* and in relation to conservation areas, special attention must be paid to *'the desirability of preserving or enhancing the character or appearance of that area'.* 41 The NPPF states that when considering the impact of the proposal on the significance of the designated heritage asset, great weight should be given to the assets conservation. Significance can	

	be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Policy HC1 'Heritage conservation and growth' of the draft London Plan, as well as London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. 42 The application site does not fall within a conservation area, nor does it contain any listed buildings. Notwithstanding this, the site is located broadly in the locality of the Noel Park Conservation Area as well as in relative proximity to the Grade II listed Turnpike Underground Station Building which is situated approximately 110 metres south east of the site. 43 As requested at pre-application stage, a Townscape and Visual Impact Assessment (TVIA) has been provided which demonstrates less than substantial impact on the listed Turnpike Station building in the surrounding context. Having regard to the statutory duty in respect to listed buildings in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the relevant paragraphs in the NPPF, it is acknowledged that there would be some harm to the setting of heritage assets caused by reason of larger buildings becoming visible in the backdrop to nearby listed buildings and conservation areas. Notwithstanding this, GLA officers consider the resulting harm to be less than substantial and decisively outweighed by the public benefits of the scheme, which include the further optimisation of the site within the designated Opportunity Area, the provision of new public realm and the improved permeability of the site. The scheme therefore complies with Policy 7.8 of the London Plan and Policy HC1 of the draft London Plan and is supported. **Sustainable Development** Energy 44 An on-site reduction of 222 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected for the non-domestic buildings,	

	equivalent to an overall saving of 41%. An on-site reduction of 93 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected for the domestic buildings, equivalent to an overall saving of 38%. 45 Given the scale of the development, and in line with the GLA guidance, a CHP-led strategy is not considered the optimal for the site. The applicant must review their heating strategy and investigate all other heating technologies for their suitability to supply the heating loads. 46 Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified. Detailed comments have been forwarded to the applicant under separate cover in this regard. Flooding and drainage 47 Detailed comments regarding flood risk and drainage have been forwarded to the LPA and applicant under separate cover. The applicant must provide a Flood Risk Assessment (FRA) as required under the NPPF for sites in Flood Zone 1 larger than 1 hectare. 48 The surface water drainage strategy for the proposed development does not comply with Policy 5.13 of the London Plan Policy SI.13 of the draft London Plan, as it does not give appropriate regard to the drainage hierarchy. Further details on how SuDS measures at the top of the drainage hierarchy will be included in the development, particularly blue/green roofs, must be provided. Revised attenuation storage volume calculations that account for 40% climate change, and exceedance pathway information should also be provided. Attenuation Storage layout should be shown on a plan of the development. 49 The scheme does not meet the water consumption targets for residential components of the development, and this must be addressed in accordance with Policy 5.15 of the London Plan and SI.5 of the draft London Plan. **Transport** Crossrail 2 safeguarding 50 The application site is covered by the 2015 safeguarding directions relating to delivery of Crossrail 2. As discussed previously under the principle of development section of this report, and as the applicant was advised at pre-application stage, the scheme therefore conflicts with Policy 6.4 of the London Plan and Policy T3 of the draft London Plan, which require development to provide adequate protection for transport schemes with priority given to securing the delivery of Crossrail 2.	

	Until such time as a decision is made by the Secretary of State on the Crossrail 2 alignment, a binding planning obligation would need to be secured to prevent development of the site until the safeguarding direction is lifted (alongside an extended consent period). GLA officers would welcome further discussion with the Council and applicant on the wording of this planning obligation. 51 There are a number of potential constraints on the redevelopment of a site situated close to underground tunnels and infrastructure. In order to safeguard the integrity of the underground the applicant must liase with London Underground and TfL, and the Council should incorporate appropriate conditions as required. Car parking- residential 52 The residential components of the proposed development will be car free in line with draft London Plan policy T6. The applicant is proposing a total of 11 on-site blue badge spaces from the outset, which equates to one per dwelling for 6% of dwellings, which is draft London Plan compliant. The draft London Plan states that 10% of residential units should have access to disabled parking should demand be increased in future. The applicant must therefore demonstrate on plan and as part of the Car Parking Design and Management Plan, how the remaining disabled parking bays to a total of one per dwelling for 10% of dwellings can be requested and provided when required. Four parking spaces should also be equipped with electrical charging facilities, with passive provision for the remainder of parking spaces. Car parking - hotel 53 The proposed hotel element of the development will be car free in line with draft London Plan policy. The applicant is proposing 3 blue badge parking spaces for the hotel element of the development, which is in line with draft London Plan requirements and is therefore welcome. At least one of these spaces should be provided with electric charging facilities with passive provision for the remaining spaces, and this should be secured by condition. The lack of coach parking provision on site, and the measures proposed to ensure coach bookings to the site are not made, are also welcomed. Car parking – retail and flexible workspace 54 The applicant is proposing no general car parking for either the retail or flexible workspace elements of the development, this is in line with both London Plan and draft London Plan standards	

	and is therefore welcome. Both the retail and flexible workspace elements of the development should each have their own disabled parking bay to adhere to draft London Plan standards. Cycle parking 55 A total of 406 cycle parking spaces are proposed (368 long stay and 38 short stay) which satisfies the standards of the London Plan. However, in order to comply with the renewed standards of the draft London Plan, the following elements of the provision should be uplifted: residential long stay; residential short stay; retail long stay; and retail short stay (where higher minimum standards are applicable in a Metropolitan Centre). 56 The provision of cycle parking at basement and ground floor level and close to the core of the building enabling easy access to/ from residential units is welcomed. Also welcomed is the provision of short-stay cycle parking spaces in the public realm. Cycle parking provision should be guided by the London Cycling Design Standards. The scheme must ensure that 5% of cycle parking spaces are able to accommodate larger models of bicycle. Lockers and changing rooms should be provided for the commercial element of the development. Healthy streets and walking 57 An assessment must be provided which reviews the proposal and surrounding site vicinity against the healthy streets indicators and principles of the draft London Plan. 58 The improved pedestrian permeability of the site is supported. A pedestrian comfort level assessment must be undertaken at three locations along the High Road for the current and proposed conditions, and any mitigation measures identified secured by condition as appropriate. Other matters 59 A Framework Travel Plan has been submitted and the measures outlined within it must be secured and monitored through the section 106 agreement. A detailed Construction Logistics Plan in line with TfL Guidance must be secured by condition, along with a full Delivery and Servicing Plan which includes the commitments provided in the draft document submitted with the application. 60 The full delivery and servicing plan should show how deliveries will be restricted during peak hours. The applicant should also undertake an observation survey of stopping and loading on High Road and Bury Road to inform both their approach to taxi pick-up/ drop off and on-street loading. The proposals must be aligned to the Mayor's Vision Zero approach to road safety and not cause	

	congestion on the High Road. **Local planning authority's position** 61 Council Officer's from the London Borough of Haringey are still currently assessing the application. The proposal is intended to be presented to Council Committee in February 2019. 62 Haringey Officer's have expressed a desire to include a Grampian condition which prohibits the development in the event that the safeguarding of the site for Crossrail 2 remains in place. This approach is supported by both Transport for London and GLA Officers, subject to a separate s106 obligation also being secured to restrict development in these circumstances. **Legal considerations** 63 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments. **Financial considerations** 64 There are no financial considerations at this stage. **Conclusion** 65 London Plan policies on principle, housing, urban design, sustainable development and transport are relevant to this application. The below issues must be addressed to ensure the proposal complies with the London Plan: • **Principle of Land Use:** The proposal conflicts with the future ability to deliver a Crossrail 2	

	and is contrary to Policy 6.4 of the London Plan and Policy T3 of the draft London Plan. The redevelopment of this safeguarded site is not supported until such time as a decision is made by the Secretary of State on the Crossrail 2 alignment, or binding planning obligations are secured that prevent development of the site until the safeguarding direction is lifted, alongside an extended consent period.. • **Housing:** 35% affordable housing without public subsidy, which is uplifted to 40% by habitable room through grant funding, including a 64LAR/36LLR tenure split in favour of affordable rent. This offer meets the Fast Track Route, provided that the rents and eligibility criteria accord with the London Plan and draft London Plan. An early review mechanism must be secured. • **Urban design and heritage:** Changes to the high road frontage, and to better activate the ground floor frontage of the hotel are required, as is a reduction in the number of units per core in buildings fronting the High Road, and improvements to the outlook of some flats are required. Conditions regarding accessible and inclusive design must be applied. • **Sustainable Development:** Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified. • **Transport:** The application conflicts with the 2015 safeguarding directions relating to delivery of Crossrail 2, Policy 6.4 of the London Plan and Policy T3 of the draft London Plan and is not supported. Binding planning obligations are required to prevent development of the site until safeguarding direction is lifted, alongside an extended consent period. Alternatively, the application should be refused. Notwithstanding this, issues regarding the protection of London Underground assets, the availability of blue badge car parking, and an improvement of cycle parking must be addressed.	
Metropolitan Police (Secure by Design)	Section 1 - Introduction: Thank you for allowing us to comment on the above planning proposal. With reference the above application we have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.	

	It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with London Borough Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1). We have met with the project Architects Shephard Robson to discuss Crime Prevention and the Secured by Design (SbD). The Architects have made mention in the Design and Access Statement with reference to design out crime or crime prevention and have specified some features of the consultation. They have also stated that further consultation will be required to review the strategy for Partition walling, Access Control Strategy, CCTV Strategy, Lighting Strategy, We would appreciate your intervention in maintaining the dialogue between the design team and ourselves and I await sight of the SbD Homes & Commercial application forms along with the proof of Certified Test Standard's for proposed physical security products. Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can be easily mitigated early if the Architects or Managing Agency was to discuss this project prior to commencement, throughout its build and by following the advice given. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to. Section 2 - Secured by Design Conditions and Informative: In light of the information provided, we request the following Conditions and Informative: Conditions: (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 such building or use and thereafter all features are to be permanently retained. (2) 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.	

	Informative: The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813. Section 3 - Conclusion: We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind. Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office. <u>Comments on gating the courtyard:</u> In respect of the gate I would most defiantly support the gate strategy and would seek for the location to as close to the building line as possible, the gate/frame should be UKAS certified to LPS 1175 SR1 as a minimum, if there was an issue regarding size that prevented the LPS certification the we would need to review the design to ensure there are no climbing aids and that any fob readers were located so as to not assist climbing, ant press to exit or break glass would need to be protected so they couldn't be interfered with from the public realm side. In regard to the communal stair cores we would welcome a access strategy that would include full access to the podium and permitted access to each stair core, potentially there will need to be additional CCTV surveillance on the vulnerable communal corridor routes and some form of rule setting on the podium deck itself. Many thanks for the initial response on this as it is all too common for us to not be spoken too on these matters.	
Archaeology	Rear of Massoro Menswear may have fragments of Dovecote Villas. Conservation officer view	Conservation

	should be sought.	officer is aware and accepts that this is acceptable.
Cadent National Grid	Low or medium pressure gas pipes – highly likely there are gas pipes in vicinity. Read guidance associated and establish actual position of mains, pipes, cables etc.	Conditioned
Environment Agency	The previous use of the proposed development site presents a high risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is within Source Protection Zone 1. The *Site Investigation Report by Ground Engineering dated September 2018 (ref: C14174A)* submitted in support of this planning application provides us with confidence that it will be possible to suitably manage the risk posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. It is our opinion that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the Local Planning Authority. In light of the above, we believe that the proposed development will be acceptable if **planning conditions** as set out below are invoked on any planning permission granted. Without these conditions we would object to the proposal in line with paragraph 170 of the National Planning Policy Framework because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution. **Condition EA 1** The development hereby permitted may not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to, and approved in writing by, the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the Local Planning Authority. Cont/d.. 2	Noted and conditioned

	Reasons To ensure that the site does not pose any further risk to human health or the water environment by managing any on-going contamination issues and completing all necessary long-term mitigation measures. This is in line with paragraph 170 of the National Planning Policy Framework. The proposed development will include piling which may penetrate the thickness of the London Clay and introduce a preferential pathway to the underlying principal aquifer. Note: The long-term groundwater monitoring will need to target the deeper aquifer and demonstrate that the proposed development is not impacting the underlying Lambeth Group, Thanet Sand and Chalk (the groundwater bodies are in hydraulic continuity with each other). **Condition EA 2** If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved. **Reasons** To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 170 of the National Planning Policy Framework. No investigation can completely characterise a site. The condition may be appropriate where some parts of the site are less well characterised than others, or in areas where contamination was not expected. **Condition EA 3** No infiltration of surface water drainage into the ground at 22-42 High Road, London, N22 6BX is permitted 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 the development is not put at unacceptable risk from, or adversely affected by,	

	unacceptable levels water pollution caused by mobilised contaminants in line with paragraph 170 of the National Planning Policy Framework. Additional comment This is supported in Section 7 of the *'Sustainable Drainage Strategy by ads consultancy dated September 2018'* submitted in support of the application where it states *'The surface water from the site will initially be intercepted via green roofs and similar landscaping features before it is ultimately intercepted by attenuation tank system. The surface water is then gradually released into the existing public surface water sewer system '.* Additionally, Section 6 of the *'Sustainable Drainage Strategy'* confirms *'Due to the existing low permeable sub soils on site and high perched water tables, the infiltration rate will be very slow and would result in very large soakaways that could be susceptible to flooding (i.e. once the sub-soil is waterlogged the soakaways will keep overflowing).* Cont/d.. 3 **Condition EA 4** Piling, deep foundations and other intrusive groundworks 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. **Reason** To ensure that the proposed piling, deep foundations and other intrusive groundworks does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework and the Environment Agency's approach to groundwater protection, February 2018 Version 1.2 https://www.gov.uk/government/publications/groundwater-protection-position-statements Some piling techniques can cause preferential pathways for contaminants to migrate to groundwater and cause pollution. A piling risk assessment and appropriate mitigation measures should be submitted with consideration of the EA guidance. 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 in-situ parameters and turbidity should be considered. The monitoring wells will need to be a minimum 5m deeper than the deepest pile in this area. **Condition EA5** 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. **Reason** To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 170 of the National Planning Policy Framework and The Environment Agency's approach to groundwater protection March 2017 Version 1.0 https://www.gov.uk/government/publications/groundwater-protection-position-statements **Additional Information** **Site Investigation and groundwater monitoring** The results of the preliminary intrusive investigation presented in the '*Site Investigation Report by Ground Engineering (dated September 2018)'* suggest that made ground and perched water are impacted by hydrocarbon contamination. The site is located within a SPZ1 with the underlying Mid-Chilterns Chalk (Principal Aquifer) overlaid by London Clay. The results of the intrusive investigation completed to date on site and nearby developments confirm that the thickness of London Clay in this area ranges around 25-29m below ground level. The proposed scheme includes buildings up to 8-storeys high with a basement and will require piling, *'The ground conditions are considered suitable for bored of CFA, but not driven piles as the vibrations during installation of driven piles could damage the existing adjoining building'.* Depending on the termination depths of the piles these works may penetrate the full thickness of the London Clay, introduce Cont/d.. 4 preferential pathways and impact the underlying principal aquifer. We therefore require the installation of deep wells to monitor groundwater quality in the deeper aquifer and demonstrate that the development is not impacting controlled waters. The monitoring wells will need to terminate a minimum of 5m deeper than the deepest pile in the area. We note the recommendation in the '*Site Investigation Report'* to undertaker further intrusive investigation across the northern and southern parts of the site. However, any intrusive investigation	

	works based on the proposal *'It is recommended that the further ground investigation work should include TPH and PCB testing of the near surface soils and perched groundwater in order to further characterise the site contamination'* is not sufficient to characterise the underlying aquifer and assess impacts of the proposed development to the deeper aquifer. **Model Procedures and good practice** We recommend that developers should: 1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination. 2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health. 3. Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed. 4. Refer to the contaminated land pages on GOV.UK for more information. We expect the site investigations to be carried out in accordance with best practice guidance for site investigations on land affected by land contamination. E.g. British Standards when investigating potentially contaminated sites and groundwater, and references with these documents: □ BS5930:2015 Code of practice for site investigations; □ BS 10175:2011 A2: 2017 Code of practice for investigation of potentially contaminated sites; □ BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points; □ BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns but more may be required to establish the conceptual site model and groundwater quality. See RTM 2006 and MNA guidance for further details). □ Use MCERTS accredited methods for testing contaminated soils at the site. A Detailed Quantitative Risk Assessment (DQRA) for controlled waters using the results of the site investigations with consideration of the hydrogeology of the site and the degree of any existing groundwater and surface water pollution should be carried out. This increased provision of	

	information by the applicant reflects the potentially greater risk to the water environment. The DQRA report should be prepared by a “Competent person” E.g. a suitably qualified hydrogeologist. In the absence of any applicable on-site data, a range of values should be used to calculate the sensitivity of the input parameter on the outcome of the risk assessment. Document ‘Groundwater Protection 3’ version 1.1 August 2013 provided further guidance on setting compliance points in DQRAs. This is now available as online End 5 guidance: https://www.gov.uk/guidance/land-contamination-groundwater-compliance-points-quantitative-risk-assessments Where groundwater has been impacted by contamination on site, the default compliance point for both Principal and Secondary aquifers is 50m. Where leaching tests are used it is strongly recommended that BS ISO 18772:2008 is followed as a logical process to aid the selection and justification of appropriate tests based on a conceptual understanding of soil and contaminant properties, likely and worst-case exposure conditions, leaching mechanisms, and study objectives. During risk assessment one should characterise the leaching behaviour of contaminated soils using an appropriate suite of tests. As a minimum these tests should be: □ upflow percolation column test, run to LS 2 – to derive kappa values; □ pH dependence test if pH shifts are realistically predicted with regard to soil properties and exposure scenario; and □ LS 2 batch test – to benchmark results of a simple compliance test against the final step of the column test. Following the DQRA, a Remediation Options Appraisal to determine the Remediation Strategy in accordance with CRL11. The verification plan should include proposals for a groundwater-monitoring programme to encompass regular monitoring for a period before, during and after ground works. E.g. monthly monitoring before, during and for at least the first quarter after completion of ground works, and then quarterly for the remaining 9-month period.	
Transport for	Transport for London administers the Crossrail 2 Safeguarding Direction made by the Secretary of	Noted and the

London (CR2 Safeguarding Team)	State for Transport on 24 March 2015. I confirm that the application relates to land within the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction. That London Borough of Haringey be advised that application ref: HGY/2018/3145 be refused on the basis that TfL / Crossrail 2 has reviewed the application against the latest project proposals and 2015 Safeguarding Directions and considers they conflict with the future ability to deliver a Crossrail 2 alignment via Alexandra Palace and the provision of a new Crossrail 2 Station and its associated infrastructure at Turnpike Lane. The nature of the proposals do not lend themselves to any form of temporary permission. The applicant has indicated a wish to continue discussions with TfL and the Greater London Authority (GLA) to explore a possible solution. One option open to TfL/Crossrail 2 in the event that the application, but for the Crossrail 2 Safeguarding Directions, is supported in principle by the Local Planning Authority and the Mayor, is to require that any grant of planning permission be subject to a section 106 obligation (to which TfL would be a signatory) restricting development on any land subject to the Crossrail 2 Safeguarding Directions until such time as the land is no longer subject to the Safeguarding Directions, or unless otherwise agreed with TfL and the Local Planning Authority. In addition, any decision to grant planning permission by the Local Planning Authority should be subject to the following Crossrail 2 condition C1. None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling and any other temporary or permanent installations and for ground investigations, have been submitted to and approved in writing by the Local Planning Authority which:- (i) Accommodate the proposed location of the Crossrail 2 structures including temporary works, (ii) Accommodate ground movement arising from the construction thereof, Transport for London Crossrail 2 Safeguarding Manager 4th Floor, North Wing 55 Broadway London	agreement shall be included within the S106 Legal Agreement.

	SW1H 0BD Phone: 020 3054 7018 www.TfL.gov.uk (iii) Mitigate the effects of noise and vibration arising from the operation of Crossrail 2 within its tunnels and other structures. The development shall be carried out in all respects in accordance with the approved design and method statements. All structures and works comprised within the development hereby permitted which are required by paragraphs C1(i), 1(ii) and 1(iii) of this condition shall be completed, in their entirety, before any part of the building[s] hereby permitted is/are occupied. No alteration to these aspects of the development shall take place without the approval of the Local Planning Authority in consultation with Crossrail 2. Informative: Transport for London is prepared to provide to information about the proposed location of the Crossrail 2 tunnels and structures. It will supply guidelines about the design and location of third party structures in relation to the proposed tunnels, ground movement arising from the construction of the tunnels and noise and vibration arising from the construction and use of the tunnels. Applicants are encouraged to discuss these guidelines with the Crossrail 2 engineer in the course of preparing detailed design and method statements. In addition, the latest project developments can be found on the Crossrail 2 website www.crossrail2.co.uk , which is updated on a regular basis. <u>Final Comments:</u> Following a borough liaison between LBH and some TfL colleagues, it is my understanding the applicant is happy to accept the s106 condition, which CR2 will be a signatory to, as well as the Grampian condition. This is great news for us and I just wanted to thank you for liaising with the applicant and us to help resolve the issue. Your help is much appreciated.	
TfL Stage 1 Comments	**Crossrail 2 Safeguarding** You will be aware that Transport for London (Crossrail 2) has advised the Council that this planning	Accepted that the S106 / Grampian

	application should be refused as the proposals would conflict with the future ability to deliver a Crossrail 2 alignment via Alexandra Park and the provision of a new station and associated infrastructure at Turnpike Lane. This objection is set out in the TfL, Crossrail 2 letter to the Council dated 9 November 2018. You will also note that Crossrail are willing to explore possible solutions with the developer, indicating possible section 106 obligations as well as conditions. Haringey Council are therefore urged to consider these options and convene further discussions as necessary. The comments below are therefore without prejudice to the advice about Crossrail 2 conflicts. **Proposed development** We understand the development to be made up of: □ Land use C3: 197 residential units □ Lad use C1: 134 bedroom hotel □ Land use A1: 3,454sqm □ Land use B1/D1: 527sqm **Site description** The site is bounded by the A105 High Road to the west; Whymark Avenue to the south; and Bury Road to the east. The adjacent A105 High Road forms part of the Strategic Road Network (SRN). The nearest section of the Transport for London Road Network (TLRN) is the A10 Great Cambridge Road which is located approximately 1.75 kilometres to the east of the site. The nearest station is Turnpike Lane, located around 150m to the south, which is served by the Piccadilly Line. Wood Green station, also served by the Piccadilly line, is located around 700m to the north. The nearest national rail station is Hornsey, which is located approximately 700 metres to the west of the site. There are bus stops located directly outside the site on the High Road. These provide access to bus routes 67, 121, 123, 184, 221, 230, 232 and 329. A further 3 bus routes can be accessed on Westbury Avenue within 150m of the site. Due to the aforementioned public transport connections, the site achieves a Public Transport Accessibility Level (PTAL) of 6b (on a scale of 0-6b where 6b is the highest).	condition can be used to overcome the safeguarding issue. Other suggestions conditioned and included in S106 or addressed in report.

	Trip generation The applicant has provided a multi modal assessment of trips which is in accordance with TfL guidance and therefore accepted. **Car Parking** Residential TfL welcomes that the proposed development will be car free in line with draft London Plan policy T6 as this is a Metropolitan Town Centre. The applicant is proposing a total of 11 on-site blue badge spaces from the outset, which equates to one per dwelling for 6% of dwellings, which is draft London Plan compliant. The draft London Plan states that 10% of residential units should have access to disabled parking should demand be there. The applicant must therefore demonstrate on plan and as part of the Car Parking Design and Management Plan, how the remaining disabled parking bays to a total of one per dwelling for 10% of dwellings can be requested and provided when required. 20% of parking spaces should be equipped with electrical charging facilities, with passive provision for the remaining. Hotel TfL welcomes that the proposed C1 hotel element of the development will be car free in line with draft London Plan policy. The applicant is proposing 3 blue badge parking spaces for the hotel element of the development, which is in line with draft London Plan requirements and is therefore welcome. TfL request that at least one of these spaces is provided with electric charging facilities with passive provision for the remaining spaces. TfL welcomes no coach parking provision on site and the measures proposed to ensure coach bookings to the site are not made. Retail & flexible workspace The applicant is proposing no general car parking for either the retail or flexible workspace elements of the development, in line with draft London Plan standards and is therefore welcome. Both the retail and flexible workspace elements of the development should each have their own disabled parking bay to adhere to draft London Plan standards. **Taxis** TfL advise the applicant to enter discussions with the Council to convert the pay and display residential parking on Whymark Avenue for taxi use relating to the hotel, taking into account ramp	

	deployment for accessible access. In line with the Mayor's Transport Strategy, electric charging facilities for taxis should be considered. **Cycle Parking** 350 cycle parking spaces (345 long stay plus 5 short stay) are proposed for the residential element of the development, in line with current London Plan standards. The long stay provision should increase by 25 spaces and short stay by 1 space to adhere to draft London Plan requirements. A total of 10 cycle parking spaces (7 long stay plus 3 short stay) is proposed for the C1 hotel element of the development, which is in line with draft London Plan standards and is therefore welcome. The applicant is proposing a total of 43 cycle parking spaces (13 long stay plus 30 short stay) for the retail element of the development. The applicant should increase long stay provision by 1 space and short stay provision by 32 spaces to adhere to draft London Plan standards. The applicant is proposing a total of 5 cycle parking spaces (4 long stay plus 1 short stay) for the commercial element of the development, in line with draft London Plan standards and is therefore welcome. In total, the applicant should increase long stay cycle parking by 26 spaces and short stay by 2 spaces, as shown in the table below, to adhere to draft London Plan standards. Table comparing cycle parking proposals to draft London Plan standards	

Table comparing cycle parking proposals to draft London Plan standards

Land use		Draft London Plan min standards		Development proposal	Draft London Plan min requirement		Development proposal	
		LS* spaces	SS** spaces		LS spaces	SS spaces	LS spaces	SS spaces
C3/C4	1 bed unit	1.5 per unit	1 per 40 units	49 units	74	6	345	5
C3/C4	2 + bed unit	2 per unit		148 units	296			
C1	Hotel	1 per 20 bedrooms	1 per 50 bedrooms	134 bedrooms	7	3	7	3
B1	business offices (outer Lon)	1 per 150 sqm	1 per 500 sqm	525 sqm	4	1	4	1
A1	Food retail	1 per 175 sqm	1 per 20 sqm for first 750 sqm; thereafter 1 space per 150 sqm	1,430 sqm	8	42	7	20
A1	Non-food retail	1 per 250 sqm	1 per 60 sqm for first 1000 sqm; thereafter 1 space per 500 sqm	2,024 sqm	5	19	5	9
Total					394	71	368	38

*LS = long stay; **SS = short stay. Note: all floorspace figures are GEA.

We welcome the provision of cycle parking at basement and ground floor level and close to the core of the building enabling easy access to/ from residential units. TfL also welcome the provision of short-stay cycle parking spaces in the public realm. Cycle parking provision should be guided by the London Cycling Design Standards (LCDS). The applicant should ensure that 5% of cycle parking spaces are able to accommodate larger models of bicycle. Lockers and changing rooms should be provided for the commercial element of the development.

Healthy Streets & Walking

In line with the Healthy Streets principles of the draft London plan, the applicant should review their proposals and surrounding site vicinity against TfL's healthy streets indicators that can be found at: http://content.tfl.gov.uk/guide-to-the-healthy-streets-indicators.pdf. This should focus on the on-site

	public realm created by the scheme and the frontages of the site onto the highway network, as well as connectivity to Turnpike Lane station and the Coleraine Road bus stop, which is located outside the site on High Road. The nearest street crossings on High Road should also be assessed. TfL request the applicant undertakes Pedestrian Comfort Level Assessments at 3 locations along their High Road frontage for the current and proposed conditions (pedestrian numbers, footway width). TfL guidance can be found at: http://content.tfl.gov.uk/pedestrian-comfort-guidance-technical-guide.pdf Please contact TfL if further advice is required. **London Underground Infrastructure** There is no objection in principle to the above planning application. However, there are a number of potential constraints on the redevelopment of a site situated close to underground tunnels and infrastructure. Therefore, the planning application will need to demonstrate to the satisfaction of London Underground engineers that: □ the development will not have any detrimental effect on London Underground tunnels and structures either in the short or long term □ the design must be such that the loading imposed on London Underground tunnels or structures is not increased or removed □ London Underground offer no right of support to the development or land Therefore TfL requests that the grant of planning permission be subject to conditions. Further details of the conditions required have already been submitted in a letter from London Underground to the Council. **Travel Plan** TfL welcomes the submission of a Framework Travel Plan and the measures outlined within it. The Council should secure, enforce, monitor, review and ensure the funding of the Full Travel Plan through the Section 106 agreement to ensure conformity with draft London Plan policy T4. **Freight** Construction The access points and site layout shown on the construction logistics diagrams are acceptable. The	

	Council should ensure the applicant provide a detailed CLP in line with TfL guidance, which can be found at: http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf **Deliveries** The commitments in the draft Delivery and Servicing Plan (DSP) should be included in the full DSP. The full DSP should show how deliveries will be restricted during peak hours. The applicant should undertake an observation survey of stopping and loading on High Road and Bury Road to inform both their approach to taxi pick-up/ drop off and on-street loading. TfL require assurance that the proposals are aligned to the Mayor's Vision Zero approach to road safety and that they do not cause congestion on the High Road. **Summary** I trust that the above provides you with a better understanding of TfL's current position on the document. Please do not hesitate to contact me if you have any questions or need clarification on any of the points raised.	
GLA - Carbon / Sustainability	**Overview of proposals** 1. The Energy Hierarchy has broadly been followed; the applicant should submit additional information to ensure compliance with the London Plan policies. **BE LEAN** 2. A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. **CO2 and Energy Performance** **Domestic** 3. The domestic element development is estimated to achieve a reduction of 16 tonnes per annum (7%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development. 4. The applicant has provided the 'be lean' DER and TER output sheets from the modelling software. **Non-domestic Carbon Saving**	Noted. These were referred to LBH Low Carbon Officer and have been fed into the comments.

	5. The non-domestic element of the proposed development is estimated to achieve a reduction of 25 tonnes per annum (5%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development. 6. The applicant has provided the 'be lean' BRUKL sheets from the modelling software. **Energy Demand and Fabric Energy Efficiency** 7. In line with the latest GLA guidance (Table 8) the applicant should report the energy demand following the energy efficiency measures. 8. In line with the latest GLA guidance the applicant should report the overall Part L Fabric Energy Efficiency (FEE) performance of the development for both the baseline and the 'be lean' stages of the energy hierarchy in MWh/year and kWh/m2. The percentage of improvement (%) should also be provided. **Cooling and Overheating** 9. The demand for cooling and the overheating risk will be minimised through purge ventilation, a window g-value of 0.4 and MVHR units. **Domestic** 10. A Dynamic Overheating Analysis has been undertaken to assess the overheating risk within the dwellings using the CIBSE TM59 methodology and the London Design Summer Year 1 (DSY1) weather file: 2020s, High emission, 50% percentile scenario. 11. The results show that the design proposals are not anticipated to meet the CIBSE recommendations for comfort for 6% of the habitable spaces. However, with the introduction of blinds, compliance is achieved. The applicant should confirm that the blinds will be included in the base build and demonstrate that they do not interfere with the effective opening area of windows. 12. The applicant is also required to investigate and adopt further passive measures, such as external shading, to avoid the risk of overheating now and in future climate.	

	13. The applicant should also investigate the risk of overheating using the DSY 2 & 3 weather files. **Non-domestic** 14. The area weighted average (MJ/m2) and total (MJ/year) cooling demand for the actual and notional building should be provided and the applicant should demonstrate that the actual building's cooling demand is lower than the notional. **BE CLEAN** **District heating** 15. The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. However, given the site's location in a DH opportunity area and the number of potential DH networks in the vicinity, the applicant is required to provide evidence of correspondence with the borough where they clearly demonstrate that they have fully investigated any potential to connect to a DH network. 16. The applicant should provide a commitment to ensure that the development is designed to allow future connection to a district heating network. Drawings demonstrating how the site is to be future-proofed for a connection to a district heating network should be provided; these should include space provision for heat exchangers in the plant room, isolation valves, safe-guarded pipe route to the site boundary etc. 17. The applicant is proposing to install a site-wide heat network where all apartments and non-domestic building uses will be connected. A heating schematic showing the route of the heat network linking all buildings and uses on the site has been provided. 18. The site-wide heat network will be supplied from a single energy centre located in the Block B basement. An internal layout plan has been provided. **Combined Heat and Power** 19. The applicant is proposing to install a 100kWe gas fired CHP unit sized to provide circa 55% of the residential site's heat loads and 65% of the hotel's hot water demand.	

	20. A reduction in regulated CO2 emissions of 161 tonnes per annum (21%) will be achieved through this second part of the energy hierarchy. 21. The applicant should confirm that the plant efficiencies used when modelling carbon savings are based on the gross fuel input for gas rather than the net values often provided by manufacturers. 22. The applicant is required to confirm that the NOx emission standards set out in the SPG on Sustainable Design and Construction will be met. The applicant should also outline any mitigation measures required to meet the NOx emission standards and demonstrate that the additional spatial requirements can be accommodated on site. 23. The applicant should also include a commitment that the CHP operator will be required to monitor and provide evidence on a yearly basis, in the form of an annual maintenance report, to demonstrate continued compliance with the air quality emission limits. 24. The anticipated distribution losses for the proposed network should be calculated based on the length of distribution pipes and the network's operating temperatures. 25. However, and most importantly, given the scale of the development (<500 units) and in line with the GLA guidance, a CHP-led strategy is not considered the optimal for the site. The applicant should review their heating strategy and investigate all other heating technologies for their suitability to supply the heating loads. **BE GREEN** 26. The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install Photovoltaic (PV) panels and Air Source Heat Pumps (ASHPs). 27. A reduction in regulated CO2 emissions of 113 tonnes per annum (14%) will be achieved through this third element of the energy hierarchy. **Heat pumps** 28. The ASHPs will be supplying the space heating and cooling demand of the hotel, the retail	

and the flexible workspace areas. Further information on the heat pumps should be provided including: a. An estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of contribution to the site's heat loads.

b. Details of how the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER) has been calculated for the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water).

c. Manufacturer datasheets showing performance under test conditions for the specific source and sink temperatures of the proposed development and assumptions for hours spent under changing source temperatures. Whether any additional technology is required for hot water top up and how this has been incorporated into the energy modelling assumptions.

PVs

29. 34 kWp of PV is being proposed; the net proposed PV area (m2) should also be confirmed. A roof layout has been provided, however, it shows that there is additional space for a further PV installation. The applicant is required to maximise the on-site savings from renewable energy technologies, regardless of the London Plan targets having been met, and therefore the PV proposals should be reviewed.

DOMESTIC CARBON SAVINGS

Based on the energy assessment submitted at stage I, the table below shows the residual CO2 emissions after each stage of the energy hierarchy and the CO2 emission reductions at each stage of the energy hierarchy for the domestic buildings.

Table: CO2 emission reductions from application of the energy hierarchy

	Total residual regulated CO2 emissions (tonnes per annum)	**Regulated CO2 emissions reductions (tonnes per annum)**	**(per cent)**
Baseline i.e. 2013 Building Regulations		246	
Energy Efficiency	230	16	7%
CHP	161	69	28%
Renewable energy	154	7	3%

	Total **93** **38%**	
Thames Water	Waste Comments Following initial investigations, Thames Water has identified an inability of the existing foul water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position for foul water networks 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 wastewater 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 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 sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents." The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. 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. Thames Water would advise that with regard to surface water network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. The proposed development is located within 15m of a strategic sewer. 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	Noted and conditioned

	prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. 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. As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, 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. Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing a positive pumped device (or equivalent reflecting technological advances) to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions. Fitting only a non-return valve could result in flooding to the property should there be prolonged surcharge in the public sewer. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality 'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site	

	remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: “A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.” Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Water Comments 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 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-largesite/ Planning-your-development/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk 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 position on water networks 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 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 at thameswater.co.uk/preplanning. 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 15m of our underground 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-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, 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 Supplementary Comments	

	Please supply foul water existing and proposed points of connection to the public sewer system as well as connection method into any proposed connection point. If pump connection, please supply discharge pump rate. This data can then be used to determine the impact of the proposed development on the existing sewer system.	
NEIGHBOURING PROPERTIES	<u>Response 1 – Objection:</u> The height of the proposed building and closeness will cause unreasonable overcrowding to the area. The proposed storeys and significant people who will eventually live in and park around the building will impact on our road safety and create an enormous amount of traffic to an already congested High Road. Significant raising of numbers of shoppers and residents who will use and live in the building will overpopulate an already busy neighbourhood and complicate parking for the residents. <u>Response 2 – Support:</u> I think this sounds like a great idea. It will bring new homes and businesses to the area and improve a tired and run down high street. Fingers crossed it is approved! Response 3 – Support: The Future Wood Green Business Improvement BID supports this planning application. The lower end of the High Road needs significant investment to attract businesses back into some of the vacant shop units.	Noted