

Appendix 1: Consultation Responses

Stakeholder	Comments	Response
INTERNAL		
Design Officer	<p>Not all development projects involve a building or buildings for which the quality of design is important. These proposals are functional and utilitarian, they will be fit for purpose, easily maintained, and will sit in the background. In form, siting, site layout, materials and colours, the proposals will not “shout loudly” but create the minimum impact and visibility, behind a strong landscaped edge, sinking into their more important surrounding nature. For this reason projects such as this need not be reviewed by the council’s Quality Review Policy (QRP) or undergo detailed design assessment.</p> <p>However, there is also a good reason, from a planning and design point of view, why an efficient depot facility, procured cost effectively, will be hugely beneficial, which is that it will enable the release of the existing depot site. This is at Ashley Road, on the north side of Down Lane Park, close to Tottenham Hale. This location, with excellent public transport links, access to parks and facilities, is being transformed into a new District Centre, and the Ashley road site would make an excellent site for new housing, as well as taking depot traffic off local residential roads. For this reason above all, this application is an important and beneficial proposal, for the opportunity it creates at a site where many more people can be benefitted, in significant additional housing created and in improving that busy, vibrant centre.</p>	<p>Comments noted. Materials to be controlled by condition.</p>
Transportation	<p>The proposed development is for the relocation of the Council’s depot that is currently located on Asley Road N17 to a new site at 85 Marsh Lane N17 which is some 0.8km to the north of the existing depot. A full transport assessment was prepared in August 2015 for the previous scheme, since the preparation of the transport assessment there has been a number of changes to; the proposed access arrangements to the depot which will now be via Water Mead Way and the level crossing which previously provided access via Marigold Road to Shelbourne Road has been stopped-up to vehicular traffic access, and is only accessible to pedestrians via the newly completed Northumberland Park station which also provide wheel chair access. The applicant has provided a supplementary</p>	<p>Comments have been taken into account. Conditions included.</p>

Stakeholder	Comments	Response
	<p data-bbox="528 236 1675 304">Design and Modelling report to support the creation of the new access which was reviewed as part of our assessment.</p> <p data-bbox="528 347 1800 675">The development proposal is located on Marsh Lane N17 and is accessed via Watermead Way A1005 via Marigold Road N17, the proposed development which when completed will include a pre-fabricated depot building, including workshop, a garage and office in addition some of the relocated facility will include a fuel store/ vehicle wash facility, salt store, parks storage facility and parking to support the depot activities. It is to be noted that the trips that are proposed to be generated by the proposed relocated facility are not new trips but simply trips that are been relocated on the highways network, we will therefore be assessing the impact of the proposed relocated trip in relation to access and agrees issue and any potential safety concerns.</p> <p data-bbox="528 718 1794 1007">The deport uses was surveyed to determine what trips where generated by the uses and will be relocated to the new site, it is to be noted that the depot operation will be over a 24 hour period , however the majority of the trips generated by the depot are outside of the networks peak operational hours (08:00-09:00 and 17:00-18:000 hours). The current depot generates most of its trips between 05:00-07:00 hours) with a total of 105 in vehicular tips and 85 out vehicular trips. During the peak period the am peak hour, the development proposal will generate a total of 40 in and 33 out vehicular trips during the AM peak period and 22in and 27 vehicular trips during the PM peak period.</p> <p data-bbox="528 1050 1800 1369">The application is proposing to change the means of access from Marsh Lane/ Marigold Road to provide a direct shared vehicle access with the neighbouring bus garage, the proposed access will lead directly onto Watermead Way and is supported by a design and modelling report that was undertaken in June 2018. The report concluded that of the two options that were assessed, Option 2 (the new depot access is located 70m north of the existing staggered pedestrian crossing, creating a 3-arm junction; removal of the staggered signalled crossing on Watermead Way; and signalling the new 3-arm junction with straight pedestrian crossing across two of the arms) was chose as providing the best option for the new depot access.</p>	

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	<p>The modelling completed to support the new access demonstrated that the junction will working within theoretical capacity with the exception on one arm Watermead Way Northbound in the PM peak period which has a degree of saturation of 92.3% which is slightly above the 90% theoretical degree of saturation, however the mean maximum queue length is some 31.8 PCU which is considered acceptable. The proposed new junction will be subject to further detailed design and modelling which is being progressed by the Council's Highways Department with the aid of external highway consultant engineers in line with the TfL modelling guidelines. The removal of the existing crossing and the relocation of the crossing to some 70 metres north of the existing crossing will require realignment of the existing cycle link into the Lee Valley, we will therefore require the applicant to extend the existing cycle route to safeguard cycle connectivity into the Lee Valley details design of the proposed scheme must be submitted for approval before the existing crossing is removed.</p> <p>In relation to pedestrian traffic an promoting travel by sustainable modes of transport the development is located in an area with a low public transport accessibility level however the site is within walking distance of Northumberland Park Rail and Bus station which provide good connectivity to Tottenham Hale underground station and the High Road bus corridor. We have therefore considered that employees will be able to travel to the site by sustainable modes of transport. The development proposal is located close to several strategic cycle routes which provides access to the wider cycling network both in Haringey and the neighbouring Borough of Enfield. The applicant will be required to provide cycle parking in line with the London Plan which required the applicant to provide a total of 34 cycle parking spaces.</p> <p>The applicant is proposing to provide replacement vehicle parking to accommodate the Council's fleet of refuse vehicles and on site staff and visitors car parking spaces, a total of 62 car parking spaces including 6 wheel chair accessible car parking space and 6 electric vehicle charging spaces for the public use and taxi's, 29 light goods vehicle parking space, and 26 small goods vehicle spaces including 14 electric vehicle charging</p>	

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	<p>spaces, 57 parking bays for refuse vehicles, 6 motorcycle parking spaces and 40 cycle parking space. We have considered that as the number of parking spaces provided is determined by the operational needs of the depot and the number of space proposed are similar to the number of spaces that currently exist as part of the existing site, we wouldn't object to level of parking proposed to support the development.</p> <p>The proposed development is located next to a public rights of way which links Watermead Way to Marsh Lane via Marigold Road, the construction of the development will impact on the path, we will require details of a measure to improve the path including resurfacing, lighting, details of surface water drainage must also be provide to ensure that no surface water runs off onto the existing path from the proposed new hard standing.</p> <p>On considering the development proposal we have considered that the proposal to relocate the depot from the current location in Ashely Road to Marsh Lane would not generate any significant increase in traffic and parking demand when compared to the existing use and would not object to this application subject to the following conditions:</p> <p>1. A Workplace travel plan must be secured by condition, as part of the travel plan, the following measures must be included in order to maximise the use of public transport.</p> <p>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 2 years and must include the following measures:</p> <p>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.</p> <p>c) The applicant will be required to provide, showers lockers and changing room facility for the workplace element of the development.</p> <p>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</p>	

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	<p>32.</p> <p>2. 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 Marsh Lane, Marigold Road, Watermead Way 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. Reason: to ensure that the impacts of the development proposal on the local highways network are minimised during construction.</p> <p>3. The proposed development is located next to a public rights of way which links Watermead Way to Marsh Lane via Marigold Road, the construction of the development will impact on the path, we will require details of a measure to improve the path including resurfacing, lighting, details of surface water drainage must also be provide to ensure that no surface water runs off onto the existing path from the proposed new hard standing. Reason: to ensure that the impacts of the development proposal on the local highways network are minimised and the public rights of way is safeguarded.</p> <p>4. The removal of the existing crossing and the relocation of the crossing to some 70 metres north of the existing crossing will require realignment of the existing cycle link into the Lee Valley, we will therefore require the applicant to extend the existing cycle route to safeguard cycle connectivity into the Lee Valley details design of the proposed scheme must be submitted for approval before the existing crossing pint is removed. Reason: to ensure that the impacts of the development proposal on the local highways</p>	

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	network are minimised and the public rights of way is safeguarded.	
SUDS Officer	<p>We've taken a look at the comments and we are satisfied there will be no infiltration on this site, mitigated by the drainage proposal.</p> <p>The LLFA, had previously agreed the discharge rates these remain acceptable.</p> <p>We accept the buildings will not have green roofs as the proposed buildings are unsuitable to support a green roof structure.</p> <p>We accept the proposal in principal, and feel an appropriately worded condition be imposed, please see the suggested condition below, we're happy to be guided on this.</p> <p>No development shall take place until a detailed surface water drainage scheme for the site, which is based on sustainable drainage principals and an assessment of the Hydrological and the Hydro-geological context of the development has been submitted to and approved in writing by the Local Planning Authority.</p> <p>The drainage strategy should demonstrate the surface water run-off generated up to and including the 1 in 100 year plus 30% CC critical storm will not exceed the run-off from the undeveloped site following corresponding rainfall event.</p> <p>The scheme shall include details of its management maintenance after completion and shall subsequently be implemented in accordance with the approved details before the site is occupied.</p> <p>Explanation: Mechanism for detailed drainage proposal to be approved as the scheme is developed.</p> <p><u>Additional</u></p>	<p>Comments noted. Condition included.</p>

Stakeholder	Comments	Response
	<p>Further to our telephone conversation, and the consultants challenge to having a condition imposed, I believe we have made progress and the key issue for the LLFA, was the initial potential that the surface water could permeate through the proposed sub-base that could potentially cause pollutants to be mobilised.</p> <p>The consultants have since confirmed the SuDS system proposed will be lined this will mitigate against infiltration happening. We are satisfied with this proposal and require a cover letter from the applicant confirming the proposed SuDS solution will be built as per the approved scheme, we believe this can avoid having a condition imposed to progress this application.</p>	
<p>Carbon Reduction</p>	<p>The energy strategy makes no mention or reference to:</p> <ul style="list-style-type: none"> • The risk of overheating <ul style="list-style-type: none"> ○ While I appreciate a full overheating strategy is too much for this site, I would expect some narrative in the report referencing how overheating will be mitigated (brise soleil, site greening (trees) etc.) ○ Due to the site location and function we cannot rely on natural ventilation from opening windows etc. • The BREEAM certification <ul style="list-style-type: none"> ○ Perhaps a full BREEAM certification cannot be achieved, but what credits can be achieved on site and how? ○ This should be explained in the Energy Strategy ○ No BREEAM pre-certificate was included in the application • The performance of the ASHP <p>In addition, the Ecology Report is limited in terms of recommendations for on-site biodiversity and greening. We need to clearly understand what will be delivered on this site.</p>	<p>Comments noted. Overheating was addressed in a revised energy statement.</p> <p>Condition included.</p>

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	<p><u>Additional</u></p> <p>For EVs:</p> <p>Suggested Condition You will deliver at least 6 public Electric Vehicle Charging Points (EVCP) and 14 facilities EVCP as set out in document Marsh Lane, Energy Usage and Sustainability Statement, April 2019, submitted by DDA.</p> <p>Details and location of the parking spaces equipped with Active electric Vehicle Charging Points (ECVPS) and the passive electric provision must be submitted 3 months prior to works commencing on site. The details shall include:</p> <ul style="list-style-type: none"> · Location of active and passive charge points · Specification of charging equipment · Operation/management strategy <p>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.</p> <p>Reason: To comply with London Plan Policy 6.13.</p> <p><u>Additional</u></p> <p>I agree that the Battery will improve performance and therefore deliver carbon reduction which is not captured by the Energy Assessment template. It is also true that the cost would be more than the offset.</p> <p>On balance I would take the battery over the offsetting.</p>	

Stakeholder	Comments	Response
<p>Pollution</p>	<p>Air Quality:</p> <p>The London Plan, Policy 7.14 states that new development should:</p> <ul style="list-style-type: none"> • minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans • promote sustainable design and construction to reduce emissions from the demolition and construction of buildings; • be at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)). • Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site. <p>An air quality assessment (Document referenced HML-MMD-XX-XX-RP-T-0001) dated June 2019 by Mott MacDonald was submitted with the application. the conclusions of the assessment are as follows:</p> <p>The proposed development also includes two small boilers (<300kW) which will be used to provide heating and hot water onsite.</p> <p>A qualitative assessment of construction dust effects has been undertaken for the proposed development.</p> <p>There is predicted to be a ‘Negligible to Low Risk’ of dust creating nuisance and/or loss of</p>	<p>Comments noted. Conditions attached</p>

Stakeholder	Comments	Response
	<p>amenity and of PM10 leading to adverse health effects (without mitigation).</p> <p>Following the appropriate implementation of the mitigation measures listed in the report (i.e. Section 6), impacts are predicted not to be significant.</p> <p>Modelled results of the operation phase show that changes in NO2, PM10 and PM2.5 concentrations at sensitive receptors will be 'negligible' in accordance with the EPUK/IAQM guidance adopted for this assessment. Therefore, the impact of the proposed development on air quality at existing receptors is 'not significant'.</p> <p>An assessment of the proposed development has also found that the development is expected to be air quality neutral.</p> <p>While no operation mitigation measures are required, the AQAP should be considered within design of the proposed development, especially with regards to helping facilitate the transition in the Council's fleet to vehicles with low emissions such as through the installation of electric vehicle charging points.</p> <p>The findings of the air quality assessment are generally acceptable.</p> <hr/> <p>Contamination:</p> <p>A Desk Study Report Reference: HML-MMD-XX-XX-RP-C-0001 by Mott MacDonald, dated February 2019 was submitted with the application. An outline of the findings is as follows:</p> <ul style="list-style-type: none"> • The north of the site is partially occupied by a salt depot and parking for Haringey Council, the remainder of the site is currently derelict with evidence of having been levelled and overgrown by vegetation in places. 	

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	<ul style="list-style-type: none"> <li data-bbox="577 236 1805 384">• On Site sources include Made Ground associated with historical use, Historical use of the site as an abrasive works, Infilled pond in the north-west, Spread and stockpiled crushed demolition rubble (potential asbestos containing material), Former storage tanks and Contaminated groundwater beneath the site. <li data-bbox="577 424 1805 533">• Off-Site sources include Tottenham Marshes Landfill, Contaminated groundwater from off-site activities, Former storage tanks, Railway depot adjacent to western boundary and Above ground storage tank to the north-east <li data-bbox="577 572 1805 643">• The site is on Source Protection Zone SPZ111 Inner Protection Zone and there is Groundwater Abstraction License onsite. <li data-bbox="577 683 1805 833">• A review has been undertaken of the available desk-based resources including previous desk studies, ground investigation reports, generic and detailed risk assessment, remediation strategy and correspondence with the Environment Agency. <li data-bbox="577 873 1805 1054">• Several phases of investigation have been undertaken since 2007 and have proven ground conditions beneath the site to comprise Made Ground (generally 0.2m and 0.8m thick, with an infilled pond in the north-west where the Made Ground is up to 4.2m thick) and Alluvium (encountered between 01.30m and 3.05m bgl); <li data-bbox="577 1094 1805 1203">• Visual and olfactory evidence of contamination was reported during all ground investigations, generally noting the presence of hydrocarbons in the soil and Made Ground in the west and north of the site. <li data-bbox="577 1243 1805 1393">• Geo-environmental testing at the site identified exceedances of lead, PAHs and petroleum hydrocarbons within soils as well as visual identification of asbestos containing material in the Made Ground. Petroleum hydrocarbons were also reported during groundwater monitoring and testing. 	

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	<ul style="list-style-type: none"> • Gas monitoring at the site reported conditions representative of Characteristics Situation CS2 (low hazard potential), requiring basic protection measures to be installed in all new structures. • The site has been significantly investigated, however there are still aspects that require further work and consideration and more investigation is recommended. The following limitation were outlined; <ol style="list-style-type: none"> 1. Investigation along the eastern site boundary is limited, due mainly to the presence of overgrown vegetation and ecological constraints. This presents an area of uncertainty that requires further investigation. 2. Characterisation of the stockpiles and bunds present across the site has not been undertaken. This material will need to be classified prior to disposal and/or reuse on site. 3. The current fate of contaminants under the site is not fully characterised; particularly regarding petroleum hydrocarbons in the perched groundwater of the Secondary A Aquifer of the River Terrace Deposits. 4. A further investigation and delineation of hydrocarbon contamination was proposed by ESG in 2016, however this, along with a remediation strategy, was not undertaken. Since 2016 no further ground investigation or remedial works have been completed at the site and the current state of the groundwater is unknown. 5. Since the most recent ground investigation in 2015 all monitoring wells have either been destroyed or decommissioned, preventing their use for addition monitoring. 6. Derivation of concrete design sulphate class considering total potential sulphate in accordance with BRE Special Digest 1: 2005. <p>I recommend the following conditions:</p>	

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	<p>Combustion and Energy Plant:</p> <ul style="list-style-type: none"> • 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%). <p>Reason: As required by The London Plan Policy 7.14.</p> <ul style="list-style-type: none"> • Prior to construction of the development details of all the chimney height calculations, diameters and locations must be submitted for approval by the LPA. <p>Reason: To protect local air quality and ensure effective dispersal of emissions.</p> <p>Contaminated land: (CON1 & CON2)</p> <p>CON1:</p> <p>Prior to the commencement of the development (other than for investigative work):</p> <p>a) Using the information obtained from the previous assessments, an additional site investigation, sampling and analysis shall be undertaken at the Plot as appropriate.</p> <p>The investigation must be comprehensive enough to enable: -</p> <ul style="list-style-type: none"> i) A risk assessment to be undertaken, ii) Refinement of the Conceptual Model, and iii) The development of a Method Statement detailing the remediation requirements. <p>The risk assessment and refined Conceptual Model shall be submitted, along with the site</p>	

Stakeholder	Comments	Response
	<p>investigation report, to the Local Planning Authority.</p> <p>b) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements in respect of the Plot, 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 the Plot.</p> <p>REASON: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>And CON2:</p> <ul style="list-style-type: none"> • Where remediation of contamination on the site is required completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>Management and Control of Dust:</p> <ul style="list-style-type: none"> • No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment. 	

Stakeholder	Comments	Response
	<p>Reason: To Comply with Policy 7.14 of the London Plan</p> <ul style="list-style-type: none"> • Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA. <p>Reason: To Comply with Policy 7.14 of the London Plan</p> <ul style="list-style-type: none"> • No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases meets Stage IIIA of EU Directive 97/68/EC for both NOx and PM and 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. <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</p> <ul style="list-style-type: none"> • An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion. <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</p> <p>As an informative:</p>	

Stakeholder	Comments	Response
	<p>Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
<p>Waste Management Officer</p>	<p>Any Commercial enterprise must make arrangements for a scheduled waste collection with a Commercial Waste Contractor.</p> <p>The business owner will need to ensure that they have a cleansing schedule in place and that all waste is always contained.</p> <p>Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</p>	<p>Comments noted.</p>
<p>Regeneration Officer</p>	<p>We are supportive of this application.</p>	<p>Comments noted.</p>
<p>Economic Development Officer</p>	<p>Thank you for giving us the opportunity to comment on this application.</p> <p>I welcome the proposals and write to confirm my support for this application.</p>	<p>Comments noted.</p>

Stakeholder	Comments	Response
<p>Tree and Nature Conservation Officer</p>	<p>Lighting Was concerned with the light spill at the north of the site but have since realised this is into the Go Ahead bus bit so won't impact on any nature bits.</p> <p>Invasive species Within the Planning, Design and Access Statement, it references: "5. Invasive Plant Species – Following previous identification of 'Japanese Knotweed', an Eradication programme is currently underway and will extend through Construction phase of works to ensure permanent treatment. Other invasive species including 'Cotoneaster Species' have also been identified and will be removed as part of the works."</p> <p>I think it would be good for a requirement to produce a method statement detailing the process of removal of invasive species, methods of control and subsequent monitoring to ensure that control has been effective. Guess this could be an element of the overall landscaping condition.</p> <p>Landscaping That's fine regarding consultation with the groups and yes, the standard landscaping condition should cover replacement (5 years?)</p> <p>So I guess overall happy from me, assuming as you say standard condition on landscaping is included.</p> <p><u>Additional</u></p> <p>Happy with the knotweed treatment as per the document and also pleased with the planting plan with the increase in native hedging, trees and shrubs.</p>	<p>Comments noted. Conditions included to control invasive species.</p>

Stakeholder	Comments	Response
	I therefore have no further comments on this application.	
Noise Specialist	<p>A visit to the above site was undertaken on 20th June 2019. The area is predominately commercial/industrial without any residential properties in proximity.</p> <p>I have read the Noise Impact Assessment (Ref: 12843.NIA.01. RevA) dated 6th June 2019 approved by Kyriakos Papanagiotou of KP Acoustics. With respect to the proposed development there are no adverse noise observations made.</p> <p>Light Pollution</p> <p>As part of the application, I have viewed the Marsh Lane Depot External Lighting Rev 2 drawing dated 1st April 2019 produced by Alan Nicholson. The drawing provides the predicted light spillage and Lux levels resulting from the use of the artificial luminaires installed at the proposed development. The drawing indicates that the lux levels are adequately controlled, and as there are no light sensitive or residential premises in the immediate vicinity, I have no objections in principle to this development with respect to light pollution.</p>	Comments noted.
Arboricultural Officer	No comments made.	Noted.
Emergency Planning	No comments made.	Noted.
Parks	No the parks service has no objection. We are part of the move from Ashley Road to Marsh Lane.	Comments noted.

Stakeholder	Comments	Response
	I don't think the proposals will have a detrimental effect on LVRP or our Allotments to the north of the site.	

EXTERNAL		
Environment Agency	<p>Thank you for consulting us on the above planning application.</p> <p>We have reviewed the information submitted and object to the proposals because the risks to groundwater from the development are unacceptable.</p> <p>The applicant has not supplied adequate information to demonstrate that the risks posed to groundwater can be satisfactorily managed. We recommend that planning permission is refused on this basis in line with paragraph 170 of the National Planning Policy Framework.</p> <p>Reason(s) Our approach to groundwater protection is set out in 'The Environment Agency's approach to groundwater protection'. In implementing the position statements in this guidance we will oppose development proposals that may pollute groundwater especially where the risks of pollution are high and the groundwater asset is of high value. In this case position statements apply:</p> <ul style="list-style-type: none"> • A5 - Adequate Supply of Information • F1 - No Landfill waste activities • G11 - Discharges from areas subject to contamination. <p>Groundwater is particularly sensitive in this location because the proposed development site:</p> <ul style="list-style-type: none"> • is within source protection zone 1 • is within 50 metres of a known borehole used for the supply of water for 	<p>Objection noted. Additional information has been provided and revised comments from the EA are expected shortly.</p>

human consumption

- Is located upon a Secondary Aquifer A which is underlain by a Principal Aquifer.

To ensure development is sustainable, applicants must provide adequate information to demonstrate that the risks posed by development to groundwater can be satisfactorily managed. In this instance the applicant has failed to provide this information and we consider that the proposed development may pose an unacceptable risk of causing a detrimental impact to groundwater quality because:

1. The proposal includes a 40,000l fuel tank. Currently, insufficient information has been submitted to demonstrate the risks posed from the storage of fuel within an SPZ1 and within close proximity to a groundwater abstraction, used for potable supplies, are understood and that suitable mitigation measures are in place.
2. It is unclear if infiltration drainage through ground affected by contamination or from areas where run off is likely to be subject to contamination (ie HGV parking and turning areas) will be included as part of the SuDs scheme. Such a discharge may be subject to requirement of an Environmental Permit.
3. The proposal includes a waste activity within an SPZ1. Currently, there is insufficient information to determine if this risk associated with the storage and handling of waste have been assessed can be mitigated or if there will be a requirement for an Environmental Permit.

Overcoming our objection In accordance with our approach to groundwater protection we will maintain our objection until we receive satisfactory risk assessments that demonstrates that the risks to groundwater posed by this development can be satisfactorily managed. The information submitted must be sufficient to address the 3 points underpinning our objection.

Where measures are identified to mitigate the risks posed, we will require a detailed scheme to demonstrate how these measures will be implemented. Additionally, where one or more of the site activities may be subject to the requirement for an Environmental Permit, it is recommend that this application is subject to parallel tracking. Further

	<p>information is available from: https://www.gov.uk/government/publications/developments-requiring-planning-permission-and-environmental-permits</p> <p>Final Comments Thank you again for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence.</p>	
Natural England	Natural England has no comments to make on this application.	Noted.
Lee Valley Regional Park Authority	<p>Whilst the retention of a landscaping strip along the frontage is appropriate given the inclusion of this area within the statutory boundary of the Regional Park it appears narrower than the previous scheme and the proposed parking spaces have an unacceptable impact. Revisions are required to reduce the extent of parking and to strengthen the landscape on this boundary.</p> <p>The Authority requests that it is consulted on any application requiring approval of details of a landscaping condition included in any permission.</p> <p><u>Additional</u></p> <p>As I explained there has been very little time for further consideration of the above planning application and I am not in a position to retract the comments Stephen formally sent, albeit they are officer level comments. I appreciate that the current scheme offers more in the way of a 'green frontage' on land that falls within the Park, fronting Watermead Way and this is welcomed. It appears however that the main access into the site is now taken from Watermead Way (compared to the previous plan that you attached) and this unfortunately breaks up the continuity of the landscaped corridor.</p>	<p>Comments noted. More landscaping and biodiversity improvements are proposed within the LVRP boundary than was the case in 2015 when the previous application was approved. As such, the landscaping proposals are considered</p>

	<p>In terms of the planting scheme there are concerns about the reliance on ornamental shrub planting to the frontage, although the proposed wildflower meadow is supported. Did the applicant consider moving the native hedgerow back to run alongside the car parking with the wildflower meadow to the road frontage? This might buffer views of the car parking and emphasise the green edge to the development. It may be that the current position of the native hedgerow has a function in 'holding back' litter which is a key issue in this area.</p> <p>A final comment relates to the management of the wildflower meadow – apologies if this is covered in the application documentation but a condition relating to management methods and responsibilities will be key to the long term success of this feature</p>	<p>acceptable.</p>
<p>Thames Water</p>	<p>Waste Comments</p> <p>Thames Water would advise that with regard to waste water network and waste water process infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't 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.</p> <p>https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes.</p> <p>With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.</p> <p>https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices</p>	<p>Comments noted. Informatives included.</p>

Water Comments

On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

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-near-or-diverting-our-pipes>

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

<p>Transport for London</p>	<p>Thank you for contacting TfL Spatial Planning on the above application. It is understood that London Underground Infrastructure Protection has provided separate comments.</p> <p>TfL acknowledges the role that this development will have, but have concerns in regards to the impact on the operation of the adjacent bus garage and adhering to recent policy approaches contained within the draft London Plan and the Mayors Transport Strategy (MTS).</p> <p><u>Transport Assessment</u></p> <ol style="list-style-type: none"> 1. The applicant has resubmitted the Transport Assessment (TA) that was submitted for previously approved planning application HGY/2015/2650. Since the granting of this planning application, the Mayor has published the draft London Plan and the MTS, which contains the strategic approach and policies for transport in London. The TA should be updated to reflect the aforementioned documents. TfL will accept an addendum to this document to address this matter. 2. We note the level of vehicle movements over the site is 1156 number associated with the existing depot, and it is assumed that this presents the worse-case scenario for the proposed site. The applicant should review within the TA the routing strategy for the site, taking into consideration Vision Zero and Active Travel Zone policies as outlined in the MTS. 3. The collision data included within the TA should be updated, and reviewed in line with Vision Zero and Active Travel Zone policies. <p><u>Site Entrance</u></p> <ol style="list-style-type: none"> 4. It is noted that “<i>The primary site access will be via a new traffic light controlled junction onto Watermead Way</i>”, which will replace existing accesses onto Marsh Lane. The current Council Access onto Marsh Lane will be retained with emergency use only. It is not clear whether the primary access of the site is in place, or will be coming forward with the proposed development. Please provide clarity on this matter. <p><u>Car Parking</u></p> <ol style="list-style-type: none"> 5. It is noted that 112 operational parking spaces are to be provided: 57 for HGV’s, 29 	<p>Comments noted. TfL were consulted as a courtesy as none of the roads affected by this application are under their control.</p>
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for large good vehicles and 26 for small good vehicles. It is proposed that 14 spaces of the small good vehicles will be electric vehicle charging bays.

6. Operational parking should be determined on a case-by-case basis. The applicant should therefore demonstrate that the above parking spaces are required to meet the operational needs of the business.
7. Furthermore, in line with the draft London Plan all operation parking should make provision for electric or other Ultra-Low Emission vehicles, including offering rapid charging.
8. 62 car parking spaces are proposed to serve staff and the public. This provision includes 6 disabled car parking spaces. This level of provision exceeds draft London Plan standards by 37 spaces. It is therefore requested that the level of provision is reduced in order to comply with draft London Plan standards.
9. In line with draft London Plan, where car parking is provided provision should be made fro infrastructure for electric or other Ultra-Low Emission vehicles. All operational parking should making this provision, including offering rapid charging.

Cycle Parking

10. 40 covered cycle parking spaces are proposed. This level of provision accords with draft London Plan standards, which is welcomed.

Bus Operations

11. The proposed site layout shows that a new gate will be installed. TfL are concerned that this will impact on the operation of the bus garage. Evidence must be provided that the proposed development will not impact on the operations of the adjoining Go-Ahead Bus Depot.

Construction

12. The operation of the adjoining bus depot should not be impacted during the construction phase of the development.
13. A full Construction Logistics Plan (CLP) should be secured as part of any planning permission for this site. The CLP should be prepared in line with TfL's guidance, which can be accessed using the following link: <http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf> . TfL requests to be consulted on the discharge of this

	<p>condition.</p> <p>To summarise, TfL requests further information on how the development will interact with the adjoining bus garage. The applicant should update the TA to reflect the policies and approaches included within the draft London Plan and the MTS.</p>	
<p>London Underground</p>	<p>Though we have no objection in principle to the above planning application there are a number of potential constraints on the redevelopment of a site situated close to railway infrastructure. Therefore, it will need to be demonstrated to the satisfaction of LUL engineers that:</p> <ul style="list-style-type: none"> • our right of support is not compromised • the development will not have any detrimental effect on our structures either in the short or long term • the design must be such that the loading imposed on our structures is not increased or removed • we offer no right of support to the development or land <p>Therefore we request that the grant of planning permission be subject to conditions to secure the following:</p> <p>The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:</p> <ul style="list-style-type: none"> • provide details on all structures facing LU elevation or adjacent to LU property boundary • provide details on the use of tall plant/scaffolding • accommodate the location of the existing London Underground structures • demonstrate access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering our land • demonstrate that there will at no time be any potential security risk to our railway, property or structures <p>The development shall thereafter be carried out in all respects in accordance with the</p>	<p>Comments noted. Condition included.</p>

	<p>approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.</p> <p>Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.</p> <p>We also ask that the following informative is added:</p> <p>The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; construction methods; tall plant: scaffolding and security;</p>	
<p>Network Rail</p>	<p>Thank you for consulting Network Rail about the above application. After examining the plans I would like to inform you that Network Rail have no comments to make.</p>	<p>Comments noted.</p>
<p>Historic England GLAAS</p>	<p>Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.</p> <p>In view of the lightweight nature of the proposed new build, I do not foresee archaeological impact. More comprehensive redevelopment in the future may require further assessment.</p>	<p>Comments noted.</p>

	No further assessment or conditions are therefore necessary.	
London Fire Service	<p>The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.</p> <p>The Commissioner has been consulted with regard to the above-mentioned premises and makes the following observations:</p> <p>The Commissioner is satisfied with the proposals.</p>	Comments noted.
Health and Safety Executive	<p>The proposed development site which you have identified does not currently lie within the consultation distance (CD) of a major hazard site or major accident hazard pipeline; therefore at present HSE does not need to be consulted on any developments on this site. However, should there be a delay submitting a planning application for the proposed development on this site, you may wish to approach HSE again to ensure that there have been no changes to CDs in this area in the intervening period.</p>	Comments noted.
Canal and River Trust	<p>I have just had a look at our GIS system and note that the site lies outside of our consultation buffer (50m from centre of asset for householder/minor apps and 150m for major apps), so we were not notified of the application. I have had a brief look at the proposal and don't have any concerns to raise given the distance from our nearest asset (the Lee Navigation).</p>	Comments noted.
London Wildlife Trust	No comments made.	Noted.

<p>Friends of the Earth</p>	<p>Thanks for that. I have looked at the ecology and energy sections. Three questions, before I submit a formal response:</p> <ol style="list-style-type: none"> 1. The northern perimeter fence faces SSW and so could also have PV panels to boost on-site renewable generation, without requiring additional overheads. On the other hand it might be too shaded by the main building. Has this issue been considered? The report didn't seem to look at other opportunities for renewables on site. 2. The Council's Zero 50 strategy includes the suggestion of a wind turbine in the Lee Valley. Has this site been considered as a possible location for that? 3. Would the renewable energy, planting and other environmental aspects be enforced through a planning condition? We have seen other developments proceed that then didn't include the environmental benefits suggested in the application, and the Council has not been able to require them subsequently. 	<p>Comments noted, solar panels are proposed on the roof of the building, the building delivers a 43% carbon reduction. Further panels have been considered to be unfeasible. The feasibility of a wind turbine for the area has been considered it would need to exceed 100m in height to avoid building turbulence and is being explored further but could not be provided on this site. Conditions</p>
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		included where appropriate.
North London Waste Authority	No comments made.	Noted.
Tree Trust for Haringey	No comments made.	Noted.
Metropolitan Police	<p>Section 1 - Introduction: Thank you for allowing us to comment on the above planning proposal.</p> <p>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 L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>We have met with the project Architects in February 2019 to discuss Crime Prevention and Secured by Design (SBD) for the overall site. The Architects have made mention in the Design and Access Statement with reference to design out crime or crime prevention and have specified what features of the design will reduce crime. They have also stated that should it be required, consultation will take place during the detailed design stage. At this point it can be difficult to design out any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of</p>	Comments noted. Condition and informative included.

offences.

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 continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.

	<p>Section 3 - Conclusion:</p> <p>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.</p> <p>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.</p>	
<p>London Borough of Waltham Forest</p>	<p>No comments made.</p>	<p>Noted.</p>

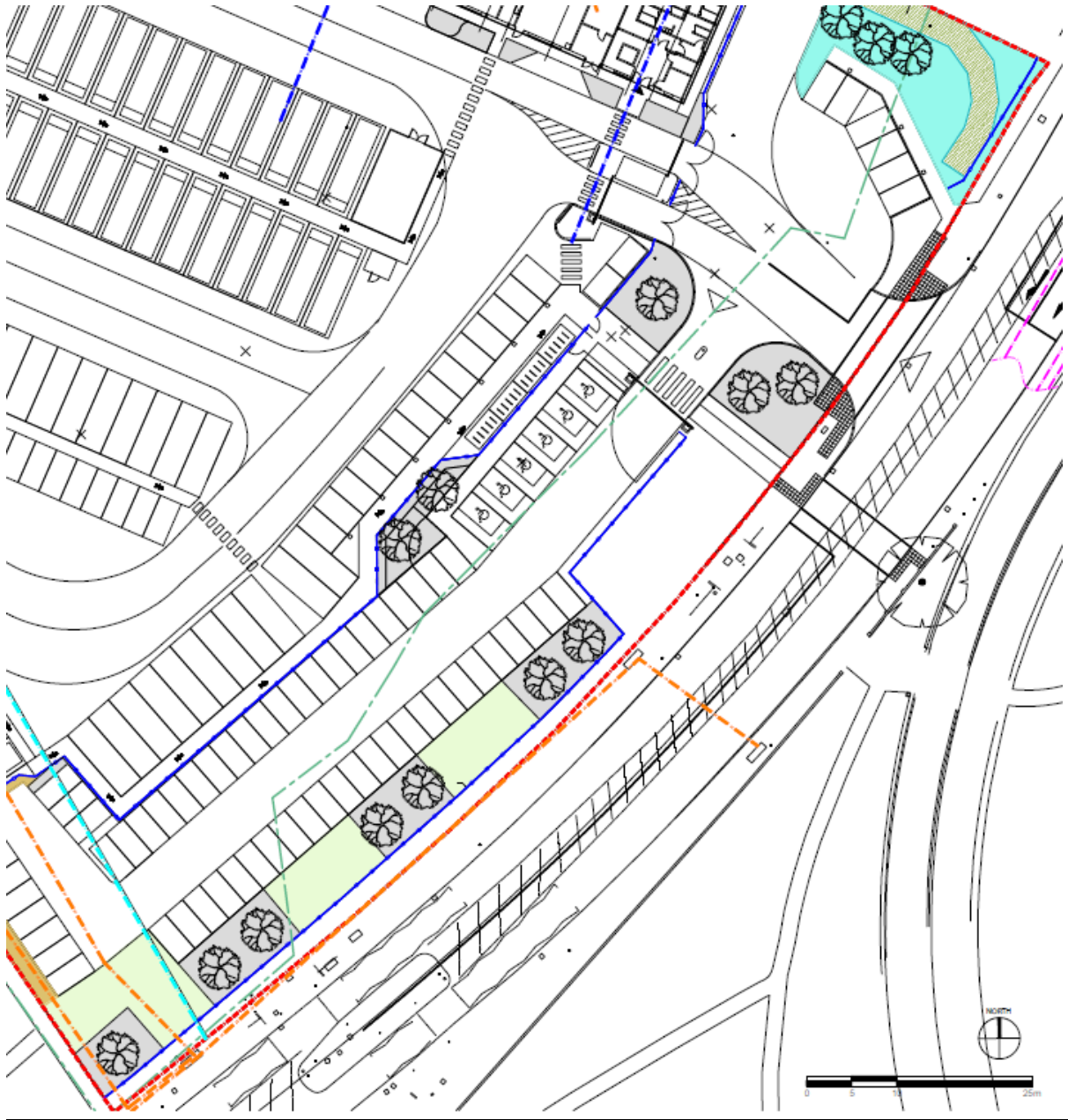
<p>LOCAL REPRESENTATIONS</p>	<p>No letters received.</p>	<p>N/A</p>
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Appendix 2: Plans and Images

Existing Site Location Plan



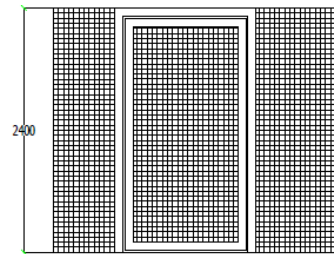
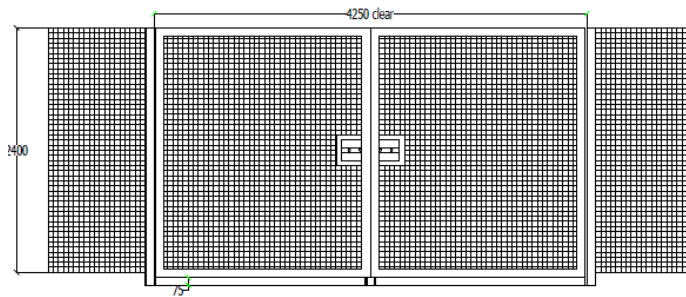
Landscaping



3D Image – View from East



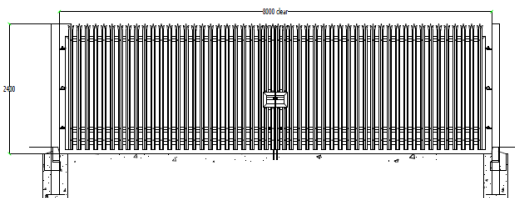
Entrance Gates



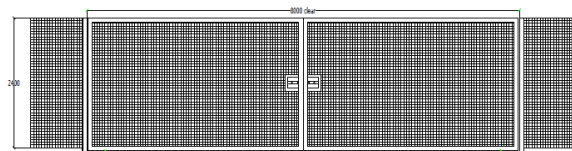
Access controlled with self closer, handle & intercom.

Main entrance gates
2 No pairs.

Pedestrian Access Gate

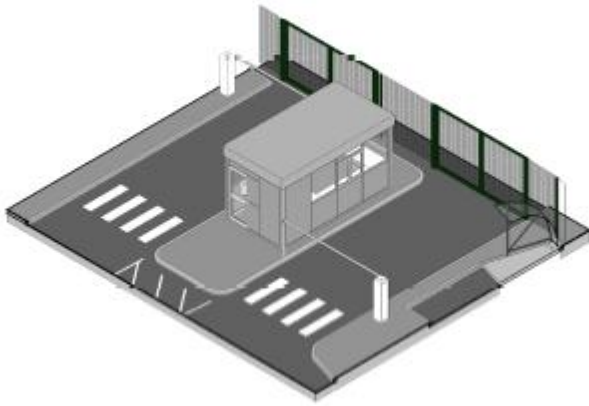


Go Ahead Gate



Marsh Lane Gate

Gate House



3D - Gatehouse Planning
