Appendix 7 Internal and External Consultee Representations

Stakeholder	Comment	Response
INTERNAL		
Climate Change	**<u>Energy Assessment</u>** **Energy – Overall** The scheme delivers a 71.1% improvement on domestic detailed scheme, 61.8% improvement to the domestic outline scheme, and 35.7% improvement to the detailed non-domestic scheme, beyond Building Regulations 2013. The policy requirement is 100% improvement beyond Building Regulations 2013 to achieve a zero-carbon development on site. - The baseline Target Emission Rates (TER) and Building Emission Rates (BER) should be clearly set out by new build domestic/non-domestic for outline and full, refurbishment domestic. - Summary tables should be provided alongside bar graphs as per Tables 3, 5, 6 & 7 in section 6 of the GLA guidance (although this should split out by outline and detailed, and residential and non-residential uses). https://www.london.gov.uk/sites/default/files/energy_assessment_guidance_2018.pdf - At the end of every section the applicant should provide summary tables of TER, DER and regulated savings achieved. - The baseline for the refurbishment does not appear to follow the GLA's guidance in Section 7 of the document linked to above. - Please confirm which units the SAP reference numbers relate to, preferably shown on plan. - What heating system has been used for the TER sheets? - Please also submit the SAP Compliance Report. ***<u>Final comments following submission of revised documents</u>*** ***The scheme now only delivers a 67% improvement, instead of 71% for the domestic detailed element. The baseline of the domestic cumulative savings has changed from 120.9 tCO_2 pa to 81.3 tCO_2 pa. This has impacted on the Be Lean carbon reductions, resulting in only 0.3% reduction for the domestic new build element. What has changed?*** ***A revised Energy Strategy will need to be submitted before commencement of Blocks D, F and G to resolve the issues that have not been resolved and address the reduction in emissions since the initial submission.***	The applicant has submitted a revised Energy Statement and Overheating Note in response to original comments and those from GLA officers. The ***'final comments'*** are in response to these revised documents. Discussed within the report. Recommended s106 planning obligations and conditions securing mitigation.

Stakeholder	Comment	Response

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	Energy – Lean
	<u>Domestic and Non-Domestic New Build (Detailed)</u>
	The applicant has proposed an improvement of beyond Building Regulations by 16.2% through improved energy efficiency standards in the domestic and non-domestic elements of the detailed new build, which is welcomed.
	
	The following issues should be addressed prior to determination of the application:
	
	- In calculating the Dwelling Emission Rate (kWh/year and kgCO_2/year) in Table 5 on page 22, the hot water and auxiliary energy demands are higher in the Be Lean stage than the baseline. In Table 7 on page 23, the Be Lean auxiliary energy demand is also much higher than the baseline. Please correct or justify.
	- Infiltration rate for the retail unit is higher in the actual building (5 m^3/hm^2@50Pa) than the notional building (3 m^3/hm^2@50Pa), please justify. *Not clarified*
	- U-values are not consistent with SAP and BRDEM sheets: *Not clarified*
	  ○ SAP new domestic 1.23 windows; Energy Statement 1.30
	  ○ BRDEM 0.17 walls; Energy Statement 0.15
	  ○ BRDEM 0.00 walls; Energy Statement 0.10. Please confirm why there would be no heat loss through roof.
	- The Energy Statement does not refer to thermal bridging at all. Please add a section in accordingly, referring to the y-values and what measures will be undertaken to improve these from the notional.
	- Please add commentary about what type of insulation will be used.
	- Can SAP outputs for SAP ref no. 12 please be submitted to provide additional information on the SAP inputs and outputs?
	
	<u>Refurbishment (Detailed)</u>
	The Energy Strategy should include commentary on how the existing performance of the listed building has been estimated and what sources were used (including u-values, thermal bridging and air tightness). Page 18 refers to Appendix S where these values are supposed to be, but this is not included in the report.
	
	Furthermore, we expect to see detail on what measures will be undertaken to make the retained listed buildings more energy efficient (what type of insulation, how the building will be	

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	made more airtight, etc)? Clear indication on plans what type of insulation materials and thickness would be useful to understand these energy efficiency proposals in context, and why the insulation in the walls, floors and windows will not be improved at all. More emphasis needs to be placed on reducing the energy demand from control systems like lighting, ventilation, equipment and appliances. It is not clear whether lighting will be replaced, advanced lighting/space conditioning controls, smart metering is proposed for the listed building. Can SAP outputs for SAP ref no. 19 please be submitted to provide additional information on the SAP inputs and outputs? <u>Domestic (Outline)</u> The applicant has proposed an improvement of beyond Building Regulations by 10.4% through improved energy efficiency standards in the domestic outline elements. This could be improved. ***<u>Final comments following submission of revised documents</u>*** ***A revised Energy Strategy is required.*** ***As part of this we recommend the Be Lean calculation should assess the Actual Building with the same heating system as the Notional Building (this will allow the energy efficiency of the dwelling fabric to be properly understood – it is currently masked by the change in heating system).*** ***The revised energy strategy should also ensure Tables 5-9 are consistent (they are not currently).*** …… **<u>Energy Strategy</u>** • The carbon calculations appear to have been done incorrectly – according to table at end of Appendix E, xCO2 have used: o 95% of heat from DHN with CO2 factor of 0.09 o 5% of heat from local gas boiler o The figure of 0.09 already incorporated 5% from gas boilers and so should be	

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	applied to 100% of the heat. This change would act to improve the 'be green stage' and reduce 'initial offset payments' / increase 'deferred offset payments' ○ The applicant explains this is in part due to the limitations of the SAP software they are using. In a revised energy strategy, we would be happy to work with the applicant to undertake manual correction to the SAP calculations. <u>Active energy efficiency measures</u> • The strategy states the distribution system will be designed in accordance with CIBSE CoP1 which will address losses. This is welcome but we would expect design to be in accordance with LBH Generic Specification (attached – although it is recognised some areas will need discussion with the developer e.g. the specification is silent on boilers and states tall buildings [such as Block b] are special cases). The LBH Generic Specification requires the scheme to meet CIBSE CoP1 good practice standards for distribution losses. • We would expect the resulting distribution losses to be <350kWh/dwelling or c. 40W/dwelling. The overheating calculations should tie up with this level of losses – a quick cross-check suggests the corridor overheating estimate is based on the recommended maximum losses in the Domestic Building Services Compliance Guide; however, the overheating risk has assumed very small pipes (8mm diameter where 35mm diameter is more likely where losses almost double and appears to have ignored risers / failed to take into account actual designs). • It is also worth noting that the minimum requirements of British Standards for pipe insulation are somewhat lax compared to the recommended maximum heat loss per meter of pipe in the Domestic Building Services Compliance Guide hence the need for increased scrutiny in this area. • We would expect clear evidence of compliance with the design standards (CP1/ LBH Generic) at various points through the project up to completion. <u>Other comments</u> • The Energy Strategy is unclear on the location of the energy centre but it is understood a permanent location is proposed below Block B. This means phasing of heat supply (including use of temporary boilers) is unclear (e.g. the proposed basement drawing for Block F suggests boilers will be installed here? That is ok on temporary basis but would expect a single EC in the long run). • A clearer strategy for the location of energy centre and phasing of the site wide network needs to be provided. This should also identify the point of connection. The developer should:	

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	○ leave space in energy centre for a substation to connect the off-site (primary) network and on-site (secondary network); ○ install dry primary pipework from energy centre to an agreed point of connection (a manhole with isolating valves) near the edge of the site. This pipework to be installed to LBH standards and left sealed and dry for future connection. The AQ implications do not seem to have been provided either. Recommendations • To address the above, it is proposed to require a revised energy strategy to be submitted for approval prior to commencement (either by condition or s106). This strategy should: ○ Redo SAP2012 calcs with correct CO2 factor for DHN to calculate an initial offset requirement covering detailed, outline, refurb and non-domestic (all of which need to be zero carbon) ○ Identify the carbon saving from connecting to the DHN (i.e. the 'be green' saving) – a deferred offset amount should be calculated to reflect the benefit that connecting to the DHN will provide ○ Clarify the location of EC, phasing of heat supply during build-out and route of primary pipework to be installed by developer and point of connection • The development should be required to be in accordance with the approved revised energy strategy through either the s106 or decision notice. • An updated overheating strategy would also need to be provided once design of the heating system has progressed. <u>The s106 should</u>: • Require the developer to commit to designing the secondary network in accordance with LBH Generic Spec (which should be referenced in the s106 – in the past we have included a schedule of departures to address things like inclusion of boilers and tall buildings) and to submit details at design stage, construction stage and commissioning stage to allow LBH to verify this has been complied with – this shall allow for site inspections • Require the developer to commit to designing the primary network they will deliver on behalf of the DHN on their site in accordance with LBH Generic Spec and to submit details at design stage and construction stage to allow LBH to verify this has been complied with – this shall allow for site inspections • Require the developer to commit to using all reasonable endeavours to negotiate a supply and connection agreement with the DHN within a 10year window. Note LBH will engage	

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	separately with the developer on this connection. • Require the developer to pay the initial offset on commencement • Require the developer to pay the [index linked] deferred offset amount (see above) if no connection has been forthcoming after 10 years • Similar provisions have been included in other s106 agreements e.g. The Goods Yard and Tottenham Hale Centre (Argent-Related). ***<u>Final comments following submission of revised documents</u>*** ***A revised energy strategy is required prior to commencement of Blocks D, F and G to set out detailed design of the heat network within the blocks and how this complies with CIBSE CoP1 and the LBH Generic Specification.*** ***This should include detail of pips routes and lengths, pipe sizes (taking account of F&R temperatures and diversification) and insulation to determine heat loss from the pipes in W/dwelling in order to demonstrate losses have been minimised.*** ***Given the site-wide energy centre for the development is in the outline portion of the scheme, a strategy should be detailed for the supply of heat to any phases occupied before the site-wide energy centre is available.*** ***Further detail should also be provided of how the developer will ensure the performance of the system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.).*** ***The above is also in accordance with recommendations in the District Heating Manual for London.*** …….. **Energy – Green** The report includes a review of the installation of various renewable technologies. The Energy Statement proposes 130 m^2 of solar photovoltaic panels on Block D, with 19.5 kWp, and 200	

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	m^2 on Blocks B and E with 30 kWp. This will reduce the CO_2 emissions by a further 6.4% on the domestic detailed element, 0% on the non-domestic detailed element, 0% on the refurbishment domestic detailed element, and 4.6% on the domestic outline element. - Please provide some commentary on how the available roof space has been maximised to install solar PV. Has your feasibility shown that other roofs will not be viable / will they be used for other purposes? - Why has a SE/SW orientation been assumed for PV when the plan below shows that the blocks have a direct southern orientation? Air source heat pumps are proposed for the commercial unit. All units should be heated through a single energy centre across the site, including commercial and shared space heating. This must be designed to connect to the DEN. Individual heating sources should therefore not be proposed. Appropriate planning conditions will be worked up to secure the maximum feasible number of PVs, their maintenance and cleaning requirements, and appropriate end of life. ***<u>Final comments following submission of revised documents</u>*** ***The revised Energy Strategy should also revisit the renewable energy strategy to include PV on Block G (or justify why it is not possible to do so)*** ***The development currently only achieves 7.3% across the whole detailed application and 4.6% across outline application) when the target is 20%.*** …….. **Carbon Offsetting** The applicant has stated that a carbon offset contribution is due to offset the remaining regulated carbon emissions for the residential new build elements of the scheme to reach 'zero carbon' requirement only. The applicant has not complied with Haringey Policy SP4 for the non-domestic element, and only assumed a reduction in carbon emissions up to 35%. The policy requires all developments to be zero carbon, and the remaining emissions must therefore be offset to 100%. Block F has also not been included in the carbon offset calculation. As the building will undergo	

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substantial works it will require energy efficiency improvements to be undertaken as well. It is acknowledged that due to the listed nature of the buildings, a full retrofit to achieve zero carbon may not be realistic, however we do expect the remaining emissions should to be offset, where viable.

Our approach to calculating carbon emissions for applications proposing to connect to the DEN include two carbon offset contribution scenarios that need to be calculated and presented in the Energy Strategy:

(1) connection to the DEN scenario
(2) the communal heating and gas boilers scenario – please include this scenario.

The carbon offset contribution for scenario 1 will be due and the difference in the offset contribution between the first and second scenarios will be deferred for 10 years and indexed accordingly. If the connection to the DEN is realised, there will be no need to pay the difference in carbon offset, but the scheme will have to pay up to this amount as a connection charge. If the scheme is not connected, the difference will be due to be paid.

Following amendments to the Energy Strategy responding to the issues listed above, we will calculate an indicative carbon offset contribution for the detailed and outline elements of the scheme. The price per tonne of carbon is currently set at £60 over 30 years.

Current carbon offset for Scenario 1
<table>
<tr><th></th><th>Baseline (tonnes CO_2 per annum)</th><th>Residual CO_2 emissions after energy hierarchy</th><th>% saving over baseline</th></tr>
<tr><td>Detailed domestic</td><td>120.9</td><td>35.0</td><td>71.1%</td></tr>
<tr><td>Detailed non-domestic</td><td>24.0</td><td>15.4</td><td>35.7%</td></tr>
<tr><td>Refurb domestic</td><td>39.8</td><td>9.5</td><td>76.2%</td></tr>
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(detailed)			
Outline domestic	255.0	97.4	61.8%

<u>Final comments following submission of revised documents</u>
Carbon offset contributions must be paid to achieve 100% reduction on Building Regulations for non-domestic elements too, in line with Policy SP4 which states that from 2019, all non-domestic developments must be zero carbon.

Correction to initial comments; the application was submitted before 1st January 2020 and will therefore need to offset carbon emissions with the £60/tCO_2 pa over 30 years.

The offset contributions for the scheme will need to be determined in the revised energy strategy (and for the outline scheme will be determined at the reserved matters stage).

The revised (and reserved matters) Energy Strategies will also determine how the offsets will be split between 'initial offset' (100% of which to be paid on commencement) and 'deferred offset'.

Note the deferred offset contribution will be set initially by the energy strategies but is also subject to refinement using 'as built' SAP calculations via the s106.

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<u>Overheating</u>

- The future weather patterns cover timeframes and projected impacts over the time periods 2020s (2011-2040), 2050s (2041-2070) and 2080s (2071-2100). The development should be modelled in all three future time periods (and results included in the report), and the risks, impacts and mitigation strategy set out for each. The buildings should demonstrate full compliance in the 2020s and 2050s through passive and building design solutions, and requirements for cooling in the 2020s need to be fitted now. The 2080s should be modelled, but due to the challenging nature of the overheating risk 60 year from now, a mechanical cooling strategy is allowed. For 2050s and 2080s periods, if new measures are required, a "retrofit" plan should set out how they will be installed, reviewing visual impacts and

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	enabling future delivery.
	• How many habitable rooms out of the total rooms have been modelled (for the full application)?
	• Can the report please include floor plans highlighting all modelled units across the development (including the north arrow) and showing all rooms with unique reference numbers? We expect the following principles to be modelled, can the applicant please confirm that has roughly been achieved?
	  ○ At least 15% of all rooms in each building block or across the development site
	  ○ If looking at flatted development, all single aspect units facing west, east, and south
	  ○ At least 50% of rooms will be on the top floor
	  ○ 75% of all rooms to be modelled will face south or south-west
	• Confirm whether the urban dataset has been used.
	• The air permeability of 5.0 is inconsistent with the Energy Statement, which states 3.0 m3 / m2h. Please amend one of the two.
	• There is no distinction in the report between the refurb and new build elements; u-values of the refurb are different and have not been specified. Please confirm whether the refurb units have also been modelled.
	• How has the scheme addressed the Cooling Hierarchy?
	• Openable windows and doors are only allowed where there are no significant noise / air pollution sources close by and risks around crime will have been designed out (windows will have limited opening based on accessibility). The report should confirm that all these strategies are in conformity, and where they are not, how this is mitigated.
	• Will there be any single aspect units (apologies if I've missed this)?
	• It should include a statement on who will manage the risk of the overheating of units in the development, on-going maintenance of installed equipment, and who would manage the installation of future mitigation measures. If necessary, how occupiers can seek advice tackling the overheating issue from management if it occurs.
	• Full results for TM59 should be included within the (appendix of) the report, not just the summary although the table on p.6 is helpful.
	• Internal blinds should be avoided as it traps the heat within the units. Please use external shutters instead, or blinds that are integrated within window frames (and please remodel accordingly).
	• Significant amount of L/K/D fail with mitigation measures proposed, please explore passive design changes to improve the situation.
	
	Overheating issues should be sorted out before the application is decided to ensure it's	

Stakeholder	Comment	Response
	integrated within the design and overall decision making of the scheme. BREEAM - Happy with the applicants aiming to achieve BREEAM Excellent. ***Final comments following submission of revised documents*** ***Generally acceptable, but please respond to the following three actions:*** ***Consultants have not responded to the point about internal blinds trapping heat inside, and why external shutters/integrated blinds have not been assessed for the current design proposals. Please justify.*** ***What shading coefficient would be required for the internal blinds? Furthermore, where internal blinds are proposed, restrictions should be placed on the removal of these blinds through the underlease.*** ***Will it be possible to install mechanical cooling in the future (2080s)? NB: weather file for 2050s starts in 2040, so mitigation measures should commence from then.***	
Conservation Officer	The Conservation Area and the listed buildings Tottenham High Road Conservation Area is a linear conservation area within a densely built-up urban setting with an almost intact 19th century townscape incorporating notable surviving examples of earlier periods. The areas immediately to the east and west of the High Road have changed dramatically. Despite these changes the townscape retains a high degree of historical continuity, maintaining a contained linear street pattern forming a sequence of linked spaces and sub spaces, and with a notable variety and contrast in architectural styles and materials. The street width and alignment very much still follow the form established by the mid-19th century. There are good surviving examples of buildings dating from the 18th and 19th centuries including outstanding groups of Georgian houses and mid and late-Victorian shopping parades illustrating the changes to this building type in scale and style, together with examples of the inter-war style of the mid-20th century. The northern part of the Conservation Area is the best surviving townscape section of the High Road, containing some outstanding Georgian architectures as part of a built sequence reflecting changing patterns of development from the early/mid-18th century through the 19th to the 20th century. The buildings of varying ages contribute to a cohesive and contained streetscape due to the general conformity in scale, height and materials together with the	Recommended conditions secure the recommended details for the Listed Buildings. Other issues addressed within the report.

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	variation in silhouette or roofline. The section of the High Road between Brantwood Road and White Hart Lane, however, is the most complete part of the conservation area in terms of its surviving historic buildings and townscape form, retaining many Georgian and Victorian buildings with their consistency of scale, height and frontage width. The High Road's northern 'entrance' is defined on the west side by listed buildings Nos. 867-869, an imposing group of early-18th century of houses, and by the Coach and Horses public house opposite, of early-19th century origins, which announce the predominantly Georgian character of the northernmost stretch of the High Road. This short entry sequence terminates with a gap site fronting the timber yard (Nos. 855-863), enclosed by unsightly hoardings, and is marked by the mature street tree on the west side of the High Road. Buildings at Nos 867-869 High road were listed in 1949 because of their architectural interest, well preserved features and townscape value and have been variously used as offices and internally altered. These architectures offer an opportunity for preservation of their special features of interest and for enhancement of their character as well as use. At the northern end of the conservation area, views north and south from Brantwood Road illustrate the open character looking north, contrasting with the enclosed character of the High Road looking south. Views of the conservation area along the linear form of the High Street, in both directions are especially important to read the urban and architectural quality of the area. Views in and out of the conservation area from junctions with side roads and from some passageways and alleys also contribute to the experience and understanding of the character of the area. Views from the side streets such as Northumberland Park and White Hart Lane each illustrate a distinct change in scale and character from that along the High Road. Key features of the conservation area which need to be preserved and enhanced include its important and distinctive original architectures, the historic linear continuity of buildings either side of the High Road, the established character of the townscape and its sense of spatial sequence highlighted by the mix of Victorian and Georgian buildings that help to give the street its scale and sense of place. <u>Policy:</u> Development in Conservation Area should preserve the character or appearance of the area	

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	and development affecting a listed building should preserve the building or its setting or any features of special architectural or historic interest which it possesses. The proposed application should be assessed according to the NPPF and Haringey Development Plan policies SP11, SP12, DM1 and DM9 would apply. <u>Proposal:</u> Hybrid planning application (part Full/Part Outline) for the demolition of existing buildings & structures and redevelopment of the site for a residential led mixed-use scheme with up to 330 residential units (class C3), retail/café use (Use Class A1/A3), area of new public open space, landscaping and other associated works. Full permission is sought in respect of internal alterations and associated works to provide 6 x 2-bedroom flats at Block D, 867 and 869 High Road (Grade II listed) and proposed Block G to its rear. Outline permission is sought for the remainder of the site, with details of “scale”, “layout”, “appearance” and “landscaping” reserved in relation to proposed Blocks A, B and C and details of “appearance” and “landscaping” only reserved in relation to Block E.” <u>Comments:</u> Block F The proposed refurbishment of listed properties at Nos 867-869 High road, identified in the applicant’s wider site plan as block F, will positively bring these nationally important, yet neglected, buildings back into beneficial residential use and the proposed conservation-led approach appropriately aims to conserve their original features and special character. The proposed internal and external refurbishment works are supported in principle depending on approval of the necessary information, proportionate to the importance of the buildings as required by NPPF paragraph 189, so to fully understand the heritage impact of proposed works. The following details should be submitted to the Local Authority to allow full assessment of the applicant’s proposal: • Full external and internal condition survey to include structural assessment in relation to roof, walls, floors, doors, windows, stairs, fireplaces, decorative features and fixtures • Material specification for facade repair, repointing and replacement of brickwork, repairs and replacements to window cills, window surrounds, doorsteps, parapets. Material samples of these works to be approved on site. • Detail section drawings to scale 1:20 to record existing structures, make up of walls, floors, roof, windows, doors and decorative cornices	

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	• Detail section drawings to scale 1:20 and 1:10 as necessary to show proposed structures, walls, floors and finishes • Detail elevation and section drawings to scale 1:10 to show interfaces between new partitions and original cornices or historic fabric • Detail drawings to scale 1:10 and 1:5 plus material specification for new panelled doors, surrounds, shutters and ironmongery to match historic details • Schematic drawings in plan and section to scale 1:50 to show MEP services • Detail drawings to scale 1:10 showing penetrations within historic fabric • Method statements for installing MEP services • Method statements for proposed demolition works related to internal partitions, fixtures, fittings and new internal openings within load-bearing walls • Method statements for removal and making good of external gates, doors, windows, window bars, fixtures and fittings such as alarm boxes, vents, timber posts, lights • Method statements, material specification for proposed works to chimneys and roof. Material samples of replacement slates, bricks, repointing, chimney pots to be approved onsite • Method statements and material specification for both proposed repair and alteration works to retained cornices, staircases, fireplaces, doors, windows, panelling and all surviving C18 and C19 elements. Trial samples of cleaning and material samples of integrations and replacement works to be approved on site • Method statement and material specification for reinstatement of fireplaces The new Blocks The overall site layout whose backbone is Pickford Avenue, originating from the High Road, sensitively distributes increasing masses, heights, architectural language variations and green spaces in such a way that mitigates the impact of tall buildings on the settings of the heritage assets affected and respects the primacy and legibility of the listed buildings and of the Conservation Area. The wider site plan shows new blocks of increasingly greater height G,E,D, C, A, B to be progressively erected eastwards behind listed block F so to create a brand new quarter in Tottenham while bridging between the small scale, three storey listed buildings fronting the Conservation Area and the emerging high rise townscape of the White Hart lane development which will front Pretoria Road. The proposed buildings would range from 3 to 6 storey height for those in the immediate	

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	surroundings of listed block F, to achieve the 9 storey block C located in the north-west corner of the site and the exceptionally tall block B tower of up to 29 storey to be located in the southern west corner of the site, aligned at the very far back of the 3 storey listed block F. In its entirety, and despite the heritage sensitive stepped approach to height and masses, the proposed group of buildings will be largely visible in views of the Conservation Area and listed buildings at 867-869 High Road from various viewpoints, both along the High Road itself, Brantwood road and surroundings. The proposed development will bear have a non-negligible impact on these heritage assets. Submitted views of the proposed development, show that due to perspective height reduction, those buildings of 6 storey maximum would be perceived as akin to the low-rise townscape of the conservation area. However taller elements such as the 9-storey block C and the tower block B would appear as exceptionally higher than the buildings of the conservation area and its heritage assets and would be visible from various viewpoints within the North Tottenham Conservation Area. Especially those views of the Grade II Listed 867-869 High Road show the contrast in scale between the historic High Street frontage and the proposed taller buildings. These exceptionally tall buildings, which are unsympathetic to the height, scale, forms of the Conservation Area and its heritage assets, would project above the existing roofline, would dominate in street views of the CA and of the visual setting of listed buildings. Block G Proposed Block G will be sufficiently set-back from grade II listed block F so to preserve its façade legibility and architectural prominence along north-south views of the High Road and from Brantwood road. The proposed architectural language, roof form, simple and subtly articulated facades and materials successfully complement those of the listed 867-869 High Road while honestly expressing a contemporary character which belongs to the new development. With its staggered height spanning from 3 to 6 storeys and an 'L' shaped plan form contained within the full width of the listed buildings, block G clearly acknowledges the importance and established proportions, plan form, height, architectural language and original siting of the listing buildings while gradually departing from these special historic features which also form the historic frontage of the Conservation Area. The new building sensitively retains and unveils the architectural and spatial qualities of the	

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	heritage assets in whose setting has been designed, absorbs and reinterprets their distinctive features and moves on to create a new frontage on the north side of the listed buildings along the newly created Pickford Avenue. Here, the well - proportioned gap between the facades of Block G and the simple side elevation of the listed buildings retains their visual exposure and legibility, and softly bridges between old and new architecture, built and landscaped spaces. Block G will indeed frame a new communal landscaped garden, Pickford Yard, located at the back of block F. The new garden offers a modern interpretation of the original back-garden of the listed buildings, re-establishes the original spatial relationship between buildings and soft landscape and would constitute a substantial enhancement of the immediate surroundings of the listed buildings. Block G, by virtue of its carefully chosen location, plan form, articulation of masses and heights will appear as a discrete, non - competing background architecture behind the listed buildings in views from the High Road and Brantwood road. The elegant simplicity and material consistency of this block with the listed building succeeds to bring the architectural qualities of the listed buildings and some of the characteristic features of the conservation area in the development site. Block G is acceptable in principle from conservation grounds depending on approval of detail design, material specification and material samples. Block D The linear, 6 storey block D will be erected along the middle-north border of the development site. The building will be located to the north side of new Pickford Avenue, just behind the 1 to 6 storey block E which will more impactfully appear in views of the listed block F from the High Road. Block D with its well-set back location within the wider development site will be quite distant from the listed block F and from the High Road frontage in general. The height, mass and architectural language of the proposed building are consistent with the contemporary character of the new development at large and ai to create a new part of Tottenham with its own distinctive character which gradually departs from the established features of the Conservation Area and its original architectures. This block will be screened from same height block E in views of the surrounding heritage assets and will modestly impact on views of both listed building and conservation area. Block D is acceptable in principle from conservation grounds depending on approval of detail design, material specification and material samples. Conclusions and Recommendations Having considered the potential for enhancement offered by the development site and by the	

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	listed buildings at 867-869 High Road and by virtue of the careful design exploration to maximize retention of special features of interest and the significance of the listed building and of the Conservation Area, it is concluded that the proposed refurbishment of the listed buildings is acceptable in principle depending on approval of detailed design. The proposed erection of new mixed-use block G and D is acceptable in principle depending on detailed design. The outline proposal for mixed-use blocks A, B, C, E does not allow to fully assess the heritage impact of these buildings on the settings of the heritage assets they will affect. From the submitted views, it is however evident that the scale, height and bulk of the proposed taller buildings A and B, especially the tower block B would dominate in the townscape within and around the conservation area. This would affect the character and appearance of the conservation area and its heritage assets. Views of the conservation area's townscape and views of Grade II Listed Block F would be adversely impacted by the anomaly constituted by taller blocks A and B, however the intrinsic form and fabric of the heritage assets would not be affected, and the visually obtrusive new buildings, whilst failing to preserve the settings of North Tottenham Conservation Area and the contributing setting of its heritage assets including Grade II listed properties at 867-869 High Road, would lead to less than substantial harm to their heritage significance. The adverse impacts of the taller blocks on the settings of the heritage assets would be considerably mitigated by the enhancement of these settings through landscape design, laying out of public areas, by sensitively designed buildings G, D, by acceptably scaled block E and by the repairs and enhancements of the listed block F. The visibility, prominence and visual impact of the taller blocks will vary depending on the views into and out of the conservation area. It is recommended to test the visual impact of detailed design of blocks A and B by means of Accurate Visual Representations (AVR views) of the proposed buildings from key viewpoints within and surrounding the Conservation Area. However, any harm, especially to nationally important assets, is undesirable in principle and the test set out in the NPPF at paragraph 196 will apply.	
Design Officer	**Summary** These proposals are a well thought through and elegantly designed response to a significant site. The masterplan and layout represent an improvement on the existing adopted	

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	masterplan, with a clear, legible street network and an enlarged park. The propose mix of heights include a tall building at 29 storeys; this is successfully justified in accordance with Haringey policy. In particular, views of the development show it would generally not be any more detrimental than the existing and previously approved tall buildings, and by completing the intended row of tall buildings along the railway edge, be in accordance with the previously approved masterplan. The detailed designs for the one existing renovated and two proposed blocks are elegantly composed and promise high quality residential living requirements. All the Quality Review Panel (QRP) concerns raised with the proposals have been successfully resolved, save one very minor one, that in Block G having to wheel the commercial waste in front of the residential entrance door. The illustrative scheme, parameter plans and particularly the design code for the outline parts of the proposals show they too could be of similarly high quality. In particular, communal entrance doors are all now designed to be clear, legible and inviting, all flats have good aspects, outlooks and private amenity spaces, with balconies or terraces always available off living rooms and designed to provide privacy and hide residents' clutter. The proposals have also been successfully shown to not have any significant detrimental effect on existing neighbours, considering that this has long been planned for major change, with the high Road West Masterplan Framework developed in 2014. Daylight, sunlight and wind assessments show only minor effects compared to the expectation of development previously agreed. **Principle of Development, Masterplan and Design Code** 1. Notwithstanding the weight of council policy emphasising that only comprehensive development of the whole of this allocation site is sought, this is not the first application for a piecemeal development of a part of it. An application was submitted for the Goods Yard site that has a short common boundary to this site in its south-western corner, HGY/2018/0187 & 8 and appealed before being decided, with the inspector granting the appeal and granting planning permission. Importantly the inspector concluded that as the Goods Yard proposals were in accordance with the adopted Masterplan Framework, it could be permitted despite only being for a part of the site. The same principles are being followed in consideration of this scheme; provided it is sufficiently in accordance with the Masterplan Framework, it is not unacceptable that it is not a comprehensive scheme for the entire site allocation. 2. The applicants demonstrate the proposals broadly follow the layout and mix of uses of the Arup designed Masterplan Framework. Where diverges, they demonstrate how	

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	Masterplan Framework can reasonably be adapted to accommodate divergence. Also, the changes represent improvement in some respects, particularly in the enlarged park. It is welcomed that that property boundaries will run through the middle of the city blocks envisaged in the masterplan. **Height, especially Tall Buildings** 3. Builds up from existing 3-4 storey High Road frontage to amid rise of 6 to 8 storeys around central park to one high rise block at 29 storeys. 4. Considering each criterion from Haringey's tall building policy is set in SP11 of our Strategic Polices DPD (adopted 2013 (with alterations 2017) and DM6 of our Development Management DPD (adopted 2017), skipping the 3rd & 4th bullets from the Strategic Policies, that reference the other document and the document used in preparing DM6: • The site is within the areas of both the adopted Tottenham AAP and the adopted Masterplan Framework. Both support the principle of tall buildings in this location. The adopted Masterplan Framework established in 2014 a principle that it would be acceptable to have a row of five tall and taller buildings alongside the edge of the railway in the High Road West area of North Tottenham, with the height of those towers dropping away to prevailing existing heights two – four storeys) at White Hart Lane and rising in height north and south. The Masterplan Framework suggested the row of towers north of White Hart Lane should rise to a highest tower at the northern end of the redevelopment area the then Canon Rubber Factory site. As it happened, that site was built out first, being completed in 2015, with its highest block, River Apartments, at 22 storeys. Since then, housing targets, density expectations and public transport accessibility have improved and it is therefore suggested heights could increase, and that it would not be out of place for this, the second -northernmost of the row of five towers, to be the tallest; • We prepared a borough-wide Urban Characterisation Study in 2016, which supported tall buildings in this location, right beside the railway edge, well away from the High Road with its sensitive heritage, dropping in height closer to White Hart Lane. The Characterisation Study recognises that the railway forms a significant barrier and buffer between the two sides, with the west side a much quieter, and therefore lower rise neighbourhood than the east, as well as the railway corridor being at its widest beside this site, giving a much greater distance of 60-70m, with the broad, wooded embankments providing further buffering between the two areas; • Context and the polices contained in DM DPD Policy DM1, "Delivering High Quality	

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	Design", are covered elsewhere in this document; • High quality design especially of public realm is considered below in para. 11, as is the protection of views in para. 6. Heritage assets and their settings are covered by the Conservation Officer's comments; • It will be capable of being considered a "Landmark" by being a way finder or marker as it will work with the other towers proposed at the Goods Yard and built at River Apartments to mark the line of the railway. More importantly, and helping to justify being the tallest tower, it should eventually mark the location of a new pedestrian bridge over the railway; • It will also be capable of being considered a "Landmark" by being elegant, well-proportioned and visually interesting when viewed from any direction • It will also be capable of being considered a "Landmark" by positively engaging with the immediately surrounding street network by being sited on a key street corner, that is also at the north-western corner of the park; • Consideration of impact on ecology and microclimate encompasses daylight, sunlight and wind, examined in detail from para. 21 onwards, which explain the impact is not significant. Impact on ecology could also include impact on the flight of birds and other flying creatures, but this is only likely to be relevant adjacent to open countryside, a large open space or open waterway, which this is not; • The council's Tall Buildings and Views SPD is still unpublished and therefore not relevant; • The proposed tall building will be in *some* proximity to the built River Apartments and permitted Goods Yard towers, but this is by design to produce an intended effect of a row of tall buildings. They will be sufficiently far apart though, at over 50m from each other, to avoid detrimental effects of proximity and in any case are a line of aligned, north-south proportioned towers; there would be no canyon effect as their short sides would eb the ones facing each other, and they are well spaced apart anyway; • Cumulative effects are considered in all the relevant assessments and are not found to be generally detrimental; • And the urban design analysis and 3d model views of their proposal satisfactorily shows that the tower, Block B, could be a successful and elegant landmark,	

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	contributing to the planned row of tall buildings. 5. Therefore, the proposed tall building is considered acceptable in principle in this location, albeit that it is only in outline at this stage. Reserved Matters applications for the detailed design of the tower will need to be in accordance with the parameter Plans and Design Code of this application, if approved, but will also need to give further detail, including of the justification for the tall building. It is recommended that updated, generally rendered, 3d views, especially of the significant views identified, are produced at Reserved Matters. It is also recommended that further work is done to improve the elegance of the tower, compared to the illustrative scheme in this application. **Local, Wider & Strategic Views** 6. London and Borough Strategic View Corridors all happen to be distant from this development, and therefore are not considered to be affected by this development. 7. A series of nineteen locations for Local and Wider Views of the proposal were agreed between Council Officers and the Applicants team early in the pre-application process. The applicants have included images of all the views showing the scene now, the view with just this scheme added, the view also with other approved schemes (The Goods Yard and the Tottenham Hotspur Stadium and associated developments) and the view also with the adopted masterplan. It should be noted that both much of this scheme and the high-rise elements of both the Goods Yard and Spurs development are only submitted for or approved in outline. However, except for a couple of views where the blocks submitted for detailed approval (Blocks D and G) have been rendered, all the proposed blocks and cumulative neighbouring blocks are in wireframe only. 8. The views demonstrate that this proposal would not be visible in many sensitive views, and in those where it would be visible, it would be seen alongside the existing River Apartments tower and/or the approved Goods Yards towers. Its impact would therefore not be detrimental to views where other taller buildings can already be seen, except that it would help turn those into a coherent row of tall buildings, fulfilling the way finder or marker function mentioned as one of the advantages of the proposal in para. 4 above. It will be vital for the applicants to produced revised versions of these views when detailed planning permission (reserved matters) for the high-rise block (Block B) is submitted, at least some of which must show those parts of the proposed scheme being applied for reserved matters approval, and those other parts or this scheme or neighbouring schemes where that has already been applied for, rendered, as opposed to just in wireframe.	

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	Form, Bulk & Massing 9. Across the site, bulk and massing increases with height from the smallest, most fine grained and lowest rise buildings on the High Road at the eastern end of the site, the retained existing buildings, to the most dominant bulk of the highest rise block, embedded as it is into a shoulder lower rise wing facing the park, Block A. and similar matching bulk and mass of the corner block on the opposite side of the east -west street, Block C. Block D, facing the long length or the park as planned in the masterplan, the longer side of the park as would be implemented by this scheme, is 10. In bulk and massing the QRP considered the proposals to be broadly acceptable, including the tallest block, Block A, being of four storeys, noting that the gap to its side (a single storey element housing refuse storage linking Blocks A and B), would provide an important sense of openness to the central courtyard and mews spaces, as well as providing a view through the site, not currently available below the high ceilinged two storey existing structures, of the trees on the embankment behind. **Streetscape Character, Elevational Treatment & Approach to Dwellings** 11. The primary east west street would be a continuation of Brantwood Road, running perpendicular to the High Road, leading in a straight, direct alignment to the location of the potential bridge. A grid of streets and central park run off this, with the key corners of the streets celebrated with corner treatments to each, particularly of course the tallest building, the tower that is Block B, forming the most notable and visible corner, between the east-west street and the park and forming the north-west corner of the park. The two streets running from the north corners of the park form a connection to the former Cannon Rubber site to the north, with the southern corners of the park reserved as connections to potential permitted development on Goods Yard site to south-west and potential future connections to other developable sites, within the site allocation, immediately to the south. 12. The western end of the street terminates in a space designed to accommodate a potential bridge across the railway. This is a key aspiration of the council from the wider masterplan for High Road West, essential to reducing the severance caused by the railway, increasing permeability of the street network and encouraging pedestrians. It is unfortunate but understandable that no provision for the bridge apart from providing space, is made as part of this application. The site boundary at this point also includes an awkward “dog-leg” with the neighbouring “Goods Yard” site, where the same applicants have previously gained approval for a similar hybrid application. A footpath connection between the two sites is provided for, which is very important in providing a more direct connection from this site to	

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	the nearest station at White Hart Lane (Overground). However, it will become much clearer and more convenient when the full masterplan can be implemented. 13. A significant part of our discussions focussed on the character of the streets, ensuring a pedestrian friendly public realm day and night, a contrast between the parkland character of the central amenity space and that residents will have a clear, safe route to their front door. To achieve this, it is important that the street off which residents front doors open should have clear visibility, lack of obstruction, so that it can be well lit at night. Care has been taken to the design of block communal entrances, common circulation and shared private external amenity spaces, including particularly since the last Quality Review Panel (QRP) on 11th December. In the detailed scheme, the width of the entrance to Block G has been increased and windows looking onto that block's shared private podium amenity space have been added to the stairs of Block D. All blocks' communal entrances are onto the main east-west street, in doors of width appropriate to the size of the block, into reasonably generous communal entrance halls. Ground floor flats and maisonettes all have their own front door; these are all off the various public streets in the site, with each length of street having at least one front door opening off it. This is an excellent level of active streets in a high-density residential scheme. 14. Gaps between block ends and neighbouring sites are potentially problematic where in the masterplans (both adopted Arup Masterplan Framework and those modified masterplans produced for this application), it is intended the block will continue. It is very important to have coherent street networks, with as much as possible active frontage, above all avoiding blank walls to flank ends of blocks or to the sides of private rear gardens. Blocks A and B and F and G are intended to be parts of future city blocks when the full masterplan is implemented, with in both cases further blocks to the south being required to be built up to their boundary to complete the block. In consultation with the applicants we have secured their agreement that the internal courtyards of both blocks, designed as shared private communal amenity space, will also be shared with those blocks, and that the boundary treatments in the gaps between the blocks in this application and the boundary are robust, secure and elegant fences or brick walls. 15. The elevational treatment of the main façade of Block D is of particular importance, as it faces the park; in this scheme on its own, it will form the longest side of the park, as well as the sunny, north side of the park and the one visible form the main street approach. When the masterplan is completed it should form the end elevation termination of the longest view across the length of the park. It is therefore to be welcomed that this primary elevation has been further improved since the last QRP, by thickening up brickwork	

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	elements, especially balcony facias and the front faces of bays to give it greater solidity. This elevation is now elegantly composed, with a distinct two storey base, of a scale related to the street and the ground and first floor maisonettes, four middle storeys that express individual flats but are elegantly composed, with distinct symmetrical side and central bays, and a strong parapet forming a suitable capping top. The side and rear elevations of Block D follow the same composition in simpler forms. The QRP had no concerns with the design and elevational treatment of Block G. **Residential Quality (flat, room & private amenity space shape, size, quality and aspect)** 16. Within the detailed part all maisonette, flat and room sizes are designed to comply with or exceed minima defined in the Nationally Described Space Standards. In the outline part, the illustrative scheme shows flat and room sizes could easily also be designed to comply with or exceed minima defined in the Nationally Described Space Standards. This is as is to be routinely expected. 17. In the detailed part of the scheme, Blocks D, F and G, all dwellings in the new-build portion meet or exceed the private external amenity space in the London Plan, with private gardens, balconies or roof terraces. Privacy of amenity space is achieved by most balconies being recessed, and those that are not being at least partially solid balustraded. In a recent change in response to QRP comments, all flats now have balconies off their living rooms, although some also have second balconies off a bedroom. Many flats have larger roof terraces, exploiting the design which permits roof terraces in the steps in Block G and on the podium of Block D. The exception is Block F, the retained Listed Building, where in order to respect its heritage significance, no balconies or roof terraces could be added; these flats will have access to the private shared communal landscaped garden between Blocks F and G. 18. The illustrative scheme demonstrates that the same high standard of private amenity space could be provided in the outline portion. Private amenity space could be provided to the tower (Block B) either by recessed balconies or winter gardens; which solution was most appropriate could be decided in the reserved matters application. 19. There are no single aspect north facing flat in the whole proposed development, in the illustrative scheme and in the detailed proposals. There would be some single aspect south facing one bedroom flats in Blocks C (1 per floor), D, (2 per upper floor, excluding ground & 1st), E (1 per floor) and G (2 on 2nd, 1 on 3rd floor only), but no south facing larger single aspect flats; this is a reasonable outcome for a higher density urban scheme with blocks aligned to an east-west street, and they are designed with passive solar shading	

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	and natural ventilation showing in the applicants' assessment they would not suffer overheating. There is one 2-bedroom single aspect west facing flat on each floor (except ground) of Block G, facing the park, and the illustrative scheme shows one east facing single aspect 1-bed flat in Block A also facing the flat, with two single aspect west facing 1-bed flats in each floor of the tower; these all benefit from a good outlook and also are found not to suffer from overheating. All other flats and maisonettes are at least dual aspect, many triple aspect, an exemplary achievement in such a high-density urban development. 20. There is also access to doorstep private communal amenity space, including doorstep play space, within the development. Block B, the block with the deepest floor plan, benefits from a private roof terrace, set-in from the sides and screened from neighbouring existing dwellings but providing a large area of amenity space, including an area with informal play equipment. The rest of the development has access to the central courtyard/new mews, which will also contain incidental doorstep play, seating and planting. **Daylight, Sunlight and Wind Microclimate** 21. The applicants provided Daylight and Sunlight Reports on levels within their development and the effect of their proposals on relevant neighbouring buildings, prepared 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". A "light touch" assessment of the whole development including those blocks only in outline shows that good levels of daylight potential are generally seen throughout the development. Their full assessment of daylight and sunlight to dwellings looks just at Blocks D, F and G, those that are in detail, but both that and the assessment of effect on neighbours model the other blocks as if the full extent of their parameter plans was built out, although when detailed designs are produced, they will inevitably be a smaller building mass, to fit within those parameter plans. They also model the neighbouring "Goods Yard" site as if the full extent of that approved scheme were built out; the majority of this development is also only in outline approval and again the full extent of the parameter plans is assumed, although when built out they will be smaller. 22. Their assessment finds good levels of daylight and sunlight achieves throughout the detailed parts of the proposed development, with 81 and 80% of habitable rooms (177 out of 220 & 176 of 220 rooms) meeting the daylight levels recommended for average daylight factor (ADF) and daylight distribution respectively, and 89% of living rooms (57 out of 64) meeting sunlight levels. Those that fall short all fall marginally short, by a few fractions of a	

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	percent, for instance with all Living/Dining/Kitchens that do not meet the 2% recommended ADF for kitchens achieving 1.5% which is the recommendation for living rooms. It should be noted that further assessment of internal day and sunlight levels, hopefully showing good levels being achieved, will be needed as part of Reserved Matters applications for the blocks currently in outline. 23. Their assessment on neighbours tested both nearby dwellings, as our policy requires, and the neighbouring primary school, which has a reasonable expectation of good levels of daylight and sunlight. It finds that there would be some loss of daylight to some neighbouring properties, but that the loss to the building to the south-east (no 865 High Road) and west (nos. 44-67 Pretoria Road), they would still retain good levels of daylight above 20% vertical sky component (VSC). In the case of the former Canon Rubber Factory site to the north, where most of the loss of daylight and sunlight from the development would be experienced, there would be considerable loss of daylight and some loss of sunlight compared to their existing state, but they assert with good reason that the existing state, with just single storey buildings and open cap parks on the application site, could not be expected to be their permanent condition. When that development was built, it was already understood that this application site and the rest of the High Road West Masterplan Framework area was going to be developed. The applicants' consultants' reasonable adjustment to this is to assess their day and sunlight levels against a mirror development; they could equally acceptably have assessed it against an assumed full build-out of the Arup Masterplan, which was prepared at the same time as and in consultation with the proposals for the Canon Rubber Factory site. The fact that their mirror assessment shows only minor, isolated instances of windows receiving less day or sunlight with this proposal demonstrates its impact is reasonable. 24. In the case of higher density developments, it should be noted 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, full or near full compliance with the BRE Guide is not to be expected. 25. To assess the impact of the proposals on wind microclimate, the applicants carried out	

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	wind tunnel testing of a physical model and measured the findings against long term wind statistics applicable to the site, in accordance with the industry standard “Lawson” criteria. Their assessment finds that the proposed tower (Block B) will cause significant downdrafts and tunnelling of wind along the ground at the north-west corner of the building. The applicants have therefore designed their parameter plans to include a substantial area of landscaping at this corner, and their illustrative scheme includes dense landscaping and cut-outs to Blocks B and C that would mitigate this downdraft effect, and allow safe conditions in building entrances and pedestrian areas. Careful detailed design and further wind tunnel testing would be required with Reserved Matters applications for Blocks B and C. The north-west corner of Block G would experience lower wind effects, but above the level that would be suitable for outdoor seating. The applicants therefore have moved the proposed café outdoor seating away from this corner. They find that the effect of the proposals would only be very slight increase, still within tolerable levels, to neighbours.	
Education - School Place Planning	In terms of school place planning this location sits within our Planning Area 4. Currently we have spare capacity across our primary schools in this planning area and are not projected to see a deficit of places until 2024/25. Therefore, I have no immediate comments from a school place planning perspective.	
Planning Policy	<u>Key designations</u> • Tottenham Area Action Plan • Northumberland Park Growth Area • High Road West Site Allocation (Reference: NT5) • North Tottenham, Conservation Area (part) • Archaeological Priority Area (part) • Listed Buildings • Tall Building Growth Area • Ecological Corridor (part) <u>Principle of development</u>. The site is located within the Lea Valley Opportunity Area and North Tottenham Growth Area. Policy SP1 of the Local Plan Strategic Policies document sets out that the Council will promote development within the North Tottenham Growth Area. Haringey’s Growth Areas are areas with the greatest capacity for growth and it is expected that the majority of homes, jobs and infrastructure will be delivered in these areas over the plan period.	Policy considerations are addressed in the report.

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	The Tottenham Area Action Plan (AAP) gives effect to the Council's spatial strategy for Tottenham by identifying and allocating development sites. The site falls within the High Road West site allocation (reference NT5). The allocation covers the High Road West regeneration area of which 867-879 High Road is just a relatively small part. The allocation is expected to deliver a new residential neighbourhood and a new leisure destination for London comprising 1,200 new residential units (net). The Council adopted the High Road West Masterplan Framework in December 2014. In advance of the Tottenham AAP being finalised, this set out key principles for the redevelopment and regeneration of High Road West. 867-879 High Road is located within the northern part of High Road West which is identified for a new residential neighbourhood (Peacock Gardens) set around a large new community park. The proposal seeks to deliver a residential led mixed-use development scheme with up to 330 residential units and small retail/café unit. It will involve the loss of circa 5000sqm retail floorspace, however the existing retail use is within an out of centre location and does not have specific policy protection. The residential led mixed-use development of the site generally accords with the Local Plan Strategic Policies document, Tottenham AAP and High Road West Masterplan and the principle of the proposal is therefore considered acceptable. <u>Master planning</u>. Policy AAP1 of the Tottenham Area Action Plan expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. To ensure comprehensive and coordinated development is achieved, a masterplan will be required to accompany development proposals which form part of a Site Allocation. The Council adopted a comprehensive Masterplan Framework for the High Road West in 2014. It is not necessary therefore for the application to be accompanied by a masterplan, instead the application should accord with the principles within the Council's approved masterplan. The Tottenham High Road Masterplan framework envisages the creation of a new residential neighbourhood in the northern part of the High Road West area. The land uses proposed at the site (867-879 High Road) accord with the masterplan framework and in general terms will support the creation of such a neighbourhood. Detailed consideration will need to be given to the layout of development and vehicular, cycle and pedestrian routes to ensure that the regeneration opportunity is optimised and that the site integrates well with other sites which have already come forward (to the north) or are expected to come forward in the remainder of the plan period (to the south).	

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	Quantum of development. Policy SP1 of the Local Plan Strategic Policies document states that the Council expects development in Growth Areas to maximise site opportunities. The High Road West site allocation does not specify how many dwellings should be delivered at 867-879 High Road rather the site is expected to contribute to the overall target of 1,200 net residential units within the wider allocation. Policy SP2 of the Local Plan Strategic Policies document sets out that high quality new residential development in Haringey will be provided by ensuring that new development, amongst other things, meets the density levels set out in the Density Matrix of the London Plan. In December 2019 the Mayor published his Intend to Publish version of the new London Plan. This has been subject to examination and includes changes in response to the Inspectors' recommendations. It moves away from the use of a density matrix to a more holistic approach to making the best use of land and achieving sustainable densities. Regard should be had to policy D3 of the Intend to Publish London Plan when assessing the quantum of proposed development on the site. Policy D3 seeks to optimise site capacity through a design-led approach. This approach is consistent with policy DM11 of the Council's Development Management DPD which expects optimum housing potential of a site to be determined through a rigorous design-led approach. **Mix of housing**. Policy DM11 of the Development Management DPD requires that proposals for new residential development should provide a mix of housing. The application documentation indicates that only 14% of homes would be 3+ bed units. Consideration should be given as to whether it would be appropriate for the scheme to deliver more family sized housing as the proposed amount is low. **Affordable Housing**. The proposal provides 25% affordable housing by habitable room. An affordable housing viability appraisal has been provided to justify this level of provision which is short of the borough wide affordable housing target of 40% set out in Policy SP2 of the Local Plan Strategic Policies document. The viability appraisal should be scrutinised to ensure that the level proposed is the maximum reasonable amount of affordable housing provision. The Council's Housing team should be consulted in relation to the proposed tenure mix. **Transport & Access**. We note that detailed comments have been provided by the Transport team in connection with the application. It is important that the access and movement proposals support comprehensive development across the High Road West allocation.	

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	Parameter Plan 05 addresses potential future accesses to the site from the south. It should be demonstrated that these are deliverable and will facilitate the connections envisaged in the High Road West Masterplan Framework. **Tall building**. It is noted that a tall building is proposed within the site. Only outline planning permission is sought for the tall building as part of this application. North Tottenham has been identified as being potentially suitable for the delivery of tall buildings as set out on Figure 2.2 of the Development Management DPD. Regard should be had to policy AAP6 of the Tottenham Area Action Plan and policies DM1 and DM6 of the Development Management DPD when deciding if the proposed tall building is appropriate in this location. **Heritage**. The south eastern corner of the site falls within the North Tottenham Conservation Area. The part of the site falling within the Conservation Area contains a Grade II Listed Building (867-869 High Road). The proposal retains the Listed Building and seeks to convert it to residential use. The retention of the Listed Building is supported. Policy AAP8 of the Tottenham Area Action Plan sets out that the Council will encourage heritage-led regeneration and development on Tottenham High Road. Policy DM9 sets out development that conserves and enhance the significance of a heritage asset and its setting will be supported. The Council's Conservation Team should be consulted to ensure that the proposals will not have an unsatisfactory impact on the historic environment.	
Pollution	No objections subject to securing the mitigation referred to in Section 8 of the applicant's Air Quality Assessment and specific conditions (land contamination, management and control of dust, combustion and energy plant, gas boilers, Non-Road Mobile Machinery, impact piling method statement, Demolition/ Construction Management Plans, Electric Vehicle Charging Points) and specific informatives (asbestos and dust).	Some of the mitigation referred to in the Air Quality Assessment is embedded in the design. Other mitigation referred to is secured via conditions.
Public Health	Recommendations: • Public health would like more details on how the developer will address some of the health and wellbeing issues in the area particularly the High Road i.e. crime • More details on how the developer intends to contribute to the achievement of sustainable development: Economic, Social and Environmental (National Planning Policy Framework, Paragraph 7 and 9). • More details on the cycle design and parking in line with the 2016 London Cycle Design	Most of these issues are addressed in the supporting documents and are reflected in the officer report and the recommended conditions and s106

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	Standard **Housing** - Please clarify the plans where 3 and 4-bed house seem to have the same square footage? How does the development's design account for children and adults who may have special needs such as autism and other older adults who may have conditions such as dementia? Further information: A checklist of recommendations for designing dementia-friendly outdoor environments Neighbourhoods for life. **Access to open spaces** - Public Health is glad to see the open spaces will accommodate young people and the design elements of the park are all inclusive and aesthetically pleasing. The communal courtyards are well designed to allow residents to personalise and take care of their shared environment and foster new community groups and friendships. The developers must ensure the play area proposal is compliant with the GLA Shaping Neighbourhoods: Play and Informal Recreation SPG. **Crime reduction and community safety** - We are pleased to see the screening of the playground and would like to see more details of the screening. Planning applications should consider the new contextual safeguarding framework. Further information and resource can be found on the Contextual Safeguarding website. **Transport and Cycling** - According to the Ground Floor Plan (20) we would like to have more information on the design of the cycle store – we would like to see that it caters for different size bikes and the quality and security of the facility. The developers need to ensure the cycle parking infrastructure is in line with the 2016 London Cycle Design Standard. More clarity on access to pedestrian cycle (6.5 planning statement). **Health & Wellbeing** – In Northumberland Park more than one in five residents have a limiting long-term health problem or disability (21.4%). This is substantially higher than the rate seen in Haringey (16.7%) and London (16.4%) more widely. We are working to reduce health inequalities in Northumberland Park Ward, we would like the developer to address the following: • In the community consultation 9 and 12th March – how was health and wellbeing addressed?	obligations. The officer report addresses concerns relating to children's safeguarding

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	• How does this development improve the area for the existing residents? **Amendments on background information supplied on the location** • Meridian Water Station was not included. 2.9 • Remove 4.48 - Small local area no longer operating as an open access adventure playground. it is used as a private nursery for under 5s.	
Regeneration	In September 2017, the Council agreed the selection of Lendlease to enter into a development agreement to deliver the High Road West scheme. The successful bid progresses the proposals provided in the 2014 Arup masterplan, towards a site wide comprehensive scheme, which optimises the opportunities provided by the site so that it can deliver an extent of affordable homes, jobs, business opportunities and community spaces in a high quality sustainable neighbourhood that responds to a recognised local need in the area. Some of the most significant elements of the scheme include: a. Over 2,000 high-quality, sustainable homes. b. At least 750 affordable homes (a net increase of 539), which will meet the Council's housing strategy on affordability, ensuring that the homes will be affordable for local people. c. A minimum of 191 high quality, safe, replacement homes for council tenants and resident leaseholders which meet resident aspirations as set out in the Resident Charter and will be built to new fire and safety standards. d. Over £10m of funding for social and economic support for both businesses and residents, including a contribution of c.£8m for supporting the Tottenham People Priority overall commitments. e. A cutting-edge new Library and Learning Centre and a refurbished Grange Community Hub which will provide improved community facilities early in the scheme. f. Over 100,000sqft of green spaces for the community including a large new linear community park with an outdoor gym, children's play area and Grange Gardens; a safe, central green space for local people. g. A welcoming new civic square which will be an important focus of local events and activities, bringing the community together, promoting cultural activities and enhancing activity and safety at night. h. Over 130,000sqft of commercial, retail and leisure space throughout the scheme providing a wide range of leisure, employment space, shops, cafes and restaurants around a new civic square. i. £500k of investment in the town centre and also a £500k fund for events and activities, as	

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	well as meanwhile uses which will revitalise the local centre during construction and afterwards. j. Over 3,300 construction jobs and more than 500 end-user jobs once the development is complete. k. High quality new industrial and maker/artisan space to support local businesses. The Council are currently seeking ways to increase the number of Council-owned social rent homes as part of the scheme. A conclusion to this matter would permit the Council to undertake a ballot, currently scheduled for 2020, and progress towards a planning consent for the scheme.	
Transportation	a. Proposal is redevelopment of site for a residential led mixed-use development scheme with up to 330 residential units, retail/café, are of public open space, and other associated works. Detailed permission is sought for Blocks D and G. change of use at 867 and 869 High Road (Block F), and outline permission is sought for remainder. b. The site is currently occupied by B&M Home Store (4760sqm GEA), associated car parking (195) and five smaller units (319sqm GEA) and Sui generis (806 sqm GEA). c. The site has moderate/good public transport accessibility (PTAL3/4) and is located within a CPZ. i. The main access is gained from High Road with new pedestrian / cycle links to the Cannon Road development site to the north and to the rest of High Road West Masterplan area to the south, including the Good Yard development site. The existing vehicular access to the site from High Road is modified and will include provision of an advanced cycle stop line on the access arm of the junction. The design based on vehicular swept path for a refuse vehicle requires to be reviewed to allow for 300mm error margins. In addition, vehicular swept paths (with 300mm error margins) should be provided for all routes indicated on Image 5.3 – Vehicle connectivity Plan. ii. A s278 agreement will be required for all highway works. These works must be implemented prior to occupation of the development. iii. As106 agreement for a contribution of £115,700 for Highway and public realm improvements, (based on appeal for Good Yard site) will be required. d. A parking ratio of 0.16 is proposed for residential units (54 residents car park spaces). This	These issues are addressed in the report, with recommended conditions and planning obligations securing relevant issues. The applicant has submitted additional swept-path anlysis drawings (although not with a 300mm error of margin) and amended the detailed cycle parking layout for Blocks D, F and G.

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	will include provision of 33 spaces for disabled users and 2 spaces for Car Club vehicles). Active EVCP will be provided at 12 spaces with the rest enabled for passive EVCP provision. Two short stay and one disabled bay will be provided for commercial uses. Justification is required for provision of all parking other than for disabled users. The location of car club should be indicated on drawing and justification is required for how the proposed provision of two car club bays, was determined. e. The remaining standard car parking spaces should prioritise allocation to larger residential units through a Car Park Management Plan. The car Park Management Plan should include details of how the number of parking spaces available will correspond to the phased number of dwelling constructed, to maintain the 0.16 parking ratio. Details of arrangements for parking enforcement should be included. f. The Design Code (1.4.61) indicates that car parking will be provided within 100m of the residential dwelling. This should be amended to ensure that provision for disabled user car parking spaces is within 25m of the residential dwelling. g. A s106 (car capped) agreement is required to restrict eligibility of all occupiers from obtaining CPZ parking Permits. h. A s106 agreement is required for residents of all dwellings to be offered one free car club membership and £50 user voucher, for a period of two years. i. Cycle parking provision for 608 bicycles including 10 short stay spaces within the public realm is proposed and will meet draft London Plan standards. Cycle parking for the commercial use will include 2 long stay and 4 short stay spaces. In addition, 10 short stay cycle parking spaces will be provided for visitors to the park. The proposals should include 5% provision for larger bicycles as indicated in London Cycle Design Standards. j. Where two-tiered cycle parking is proposed, there should be an aisle width of 2.5m beyond the lowered, upper cycle parking stand – see London Cycle Design Standards. k. Transport Assessment: Trip generation has been based on TRICS sites used for the Good Yard application together with Census travel to work mode shares. The assessment indicate that the proposals will result in approximately 40 (two way) vehicular trips during the morning and evening peak periods.	

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	The development will result in an overall reduction in vehicular trips when compared to results of survey of existing use. The assessment also indicated that there is adequate capacity on buses and trains to accommodate the trips generated by the proposed development. l. Travel Plan – A s106 agreement for Travel Plan monitoring fee of £3000 is required. m. Servicing and Delivery vehicle movements are envisaged to very low and are proposed to be accommodated on-street within the site - using parking bays and with appropriate Road Traffic Orders along the access road. n. Construction Management Plan (CMP): A condition requiring submission of a CMP, for approval prior to start of construction, is required. o. TfL should be consulted regarding cumulative demand / implications for public transport. p. L.B. Enfield should be consulted.	
Waste	Both the planning and Listed Building Consent applications have been given a RAG traffic light status of AMBER for waste storage and collection. • There has been no provision made for food waste storage within the residential proposal. • We would also recommend that there is a bulky waste storage area within the provision. • The acceptance of a second collection charge would need to be confirmed. • It would need to be confirmed if waste storage and collection would be part of the wider development under planning application HGY/2019/2929 or as separate application with different service provision	The applicant has submitted a revised Operational Waste Management Plan and amended the proposals to improve the waste collection areas and include bulky waste storage areas for Blocks D and G.
EXTERNAL		
Cadent Gas	Cadent have identified operational gas apparatus within the application site boundary. This may include a legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent assets in private land. The Applicant must ensure that proposed works do not infringe on Cadent's legal rights and any details of such restrictions should be obtained	

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	from the landowner in the first instance. If buildings or structures are proposed directly above the gas apparatus then development should only take place following a diversion of this apparatus. The Applicant should contact Cadent's Plant Protection Team at the earliest opportunity to discuss proposed diversions of apparatus to avoid any unnecessary delays. If any construction traffic is likely to cross a Cadent pipeline then the Applicant must contact Cadent's Plant Protection Team to see if any protection measures are required. All developers are required to contact Cadent's Plant Protection Team for approval before carrying out any works on site and ensuring requirements are adhered to.	
Environment Agency	We have assessed this application as having a low environmental risk. We therefore have no comments to make. Although we have no comments on this planning application, the applicant may be required to apply for other consents directly from us. The term 'consent' covers consents, permissions or licenses for different activities (such as water abstraction or discharging to a stream), and we have a regulatory role in issuing and monitoring them.	
Historic England	On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.	
Historic England (GLAAS)	The planning application lies in an area of archaeological interest and potential for archaeological heritage is illustrated by Roman finds that have been made in the area immediately to the north of the site. Given this, it is recommended that field evaluation is undertaken at this stage to inform a planning decision. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.	
LB Enfield	In general terms London Borough of Enfield (LBE) support plans to improve this part of Tottenham, which has close links to Fore Street and Edmonton. Social Infrastructure. The impact of the changing density and housing will have implications on community and social infrastructure, in particular school places. It is acknowledged that an upgrade has been made to an existing school (Brooke House) and further improvements are planned to other existing schools in LBH. However, there are concerns the uplift may impact	

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	school provision within Enfield (St John and St James Primary School and Raynham Primary School). Justification should be provided there would be no adverse impact in terms of social infrastructure as a result of the development within Enfield. Transport and Traffic: Assessment. The site is currently commercial. Therefore, the overall vehicle trip generation to the new residential site will likely be reduced, which is reflected in the submitted TRICS data. It is noted from the submitted Transport Assessment that cycle parking for the proposed development is being provided in accordance with Draft London Plan standards, which is welcome. 20% of the car parking spaces being provided are being given active Electric Vehicle parking, and again in accordance with Draft London Plan standards, the remaining 80% will be equipped with passive provision for future EV spaces. With regards to the car parking, and quoting Haringey policy DM32, the TA states that car parking is being provided at levels "significantly less than 1 space per unit." It is noted that 54 car parking spaces are proposed for the 330 units, which works out as a parking ratio of 0.16 space per unit. The site is partially in PTAL 4 and partially PTAL 3. The main concern is that while the site is within the Tottenham North CPZ, that CPZ ends at the Haringey / Enfield boundary, which is within walking distance of the site; this has not been addressed at any point in the TA. LBE have significant concerns that this will result in overspill parking onto streets north of the site. As such, LBE object. Assessment of and appropriate mitigation, in the form of a contribution to a CPZ being established to cover streets such as Langhedge Close, Langhedge Lane and Snells Park is required. This would be in accordance with Enfield DMD 8, which requires that developments must provide adequate mitigation for any adverse effects. There is a general concern with the TA assessment, that despite the site being located in the northernmost part of Haringey, none of the assessments carry past the Haringey / Enfield border, for example the census output data only relates to Haringey and it would make more sense for the development to be the centre point and for data to be taken from a radius around that, which would encompass developments and data in Enfield. It is noted that the committed developments list or any other part of the TA does not consider any Enfield developments, such as the nearby Meridian Water development, which is	

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	significant and should be considered. While not yet committed development, it is also recommended that the applicant is aware of the Joyce Avenue and Snells Park Estate regen. Conservation and Design: Fore Street Conservation is in the vicinity of the proposal. The southern designated area is an informal cluster of buildings of varied form and use, numerically dominated by early 19th century survivals of suburban type but entered through the gateway of later buildings – the Phoenix public house and the County Court. The significance of this part of the Conservation Area can be summarised as a vibrant, varied shopping centre which dominates the historic dimension of the place, historic character established by the surviving early 19th century buildings, giving a strong sense of time depth and evolution and corners marked by landmark buildings, mostly of red brick of c1900, often with gables or turrets. Historic England Good Practice Advice note states, the contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset. Views should be taken into account in terms of the highest part of the development to establish harm to the designated heritage asset.	
Metropolitan Police (Designing Out Crime Officer)	We have met with the project Architects to discuss Crime Prevention or Secured by Design (SBD) for the overall site. The Architects have made a positive contribution with reference to design out crime or crime prevention and have positively engaged with police regarding the outline and layout of the development. They have also stated that “should it be required; consultation will take place with a Designing Out Crime Officer during the detailed design stage”. At this point it can be difficult to fully design out any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of 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 was to discuss this project in greater detail 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	

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	adhered to. 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. In summary we have site specific comments in relation to the following items. This list is not exhaustive and acts as initial observations based on the available plans from the local authority/ architect. Site specific advice may change depending on further information or site limitations as the project develops: • Boundary Treatments – Site specific recommendations for each block as and when the detailed plans are available for review. • Car Parking – Site specific recommendations for each block as and when the detailed plans are available for review • Door/Window Specifications – Site specific recommendations for each block as and when the detailed plans are available for review. • Balconies/Climbing Aids – Balconies should be designed so that they have flush fitting glazed balconies or a flush fitting trim around the base of the balconies so as to not create a climbing aid. Any external drainpipes should be of square design and fitted flush to the wall to reduce the opportunity to climb. The design should not provide opportunities to climb. If such examples cannot be designed out and climbing may be possible then vulnerable properties must have PAS 24:2016 doors and glazing. • Communal Entrance – Site specific recommendations for each block as and when the detailed plans are available for review. • Lobby/Airlock – Site specific recommendations for each block as and when the detailed plans are available for review • Access Control - Site specific recommendations for each block as and when the detailed	

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	plans are available for review • Compartmentation - Site specific recommendations for each block as and when the detailed plans are available for review. • CCTV – It is advised that CCTV is installed covering the main entrances, the hallway/airlock/post-boxes as minimum. This should be installed to BS EN 50132-7:2012+A1:2013 standard, co-ordinate with the planned lighting system, contained within vandal resistant housing, to record images of evidential quality (including at night time) that are stored for a minimum of 30 days on a locked and secure hard drive or a remote cloud system. Appropriate signage should also be included highlighting its use. • Postal strategy – It would be advised that all post is delivered into an airlock (preferred) or through the wall to reduce the likelihood of tailgating and postal theft. Through the wall letter plates should incorporate a sloping chute and anti-fishing attributes to mitigate against mail theft and meet TS008 standard. If post is to be delivered into an airlock then these should be securely surface mounted and meet TS009 standard. • Bike Storage – Site Specific Recommendations. We recommend that there should be 3 points of locking for the bikes and signage for residents advising to lock their bikes appropriately. The bike store should not be advertised from the outside to further deter opportunistic crime and access should only be provided to those who register with the Managing Agency. • Bin Storage – External entrance door should be to LPS 1175 SR2 standard incorporating self-closing hinges, a thumb turn on the inside of the door, PIR lighting and 358 close weld mesh reinforcement on the internal face of louvers, if they incorporate a slatted ventilation design. This should be data logged and fob controlled with 2 maglocks sited 1/3 from the top and bottom and able to withstand 1200lbs/500kg of pressure individually. • Lighting – A lux plan should be provided to encourage overall uniformity of lighting and reduce the likelihood of hiding places or dark spots. It is advised that this reaches a level of 40% uniformity and is compliant to BS 5489:2013. Dusk till dawn photoelectric cells with ambient white lighting is advised for best lighting practice. Bollard lighting as a primary light source is not recommended as it does not provide suitable illumination and creates an “up lighting effect” making it difficult to recognise facial features and thus increase the fear of crime. A level of competence must be shown to sign off the lighting scheme. • Management Plan - Site specific recommendations for each block as and when the detailed plans are available for review. • Landscaping - Site specific recommendations for each block as and when the detailed plans are available for review. • Boundary Treatment - Site specific recommendations for each block as and when the	

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	detailed plans are available for review. • Emergency services - Site specific recommendations for each block as and when the detailed plans are available for review. • Lighting – It is unclear what levels of illumination will be provided. A lux plan should be provided to encourage overall uniformity of lighting and reduce the likelihood of hiding places or dark spots. It is advised that this reaches a level of 40% uniformity and is to BS 5489:2013. Dusk till dawn photoelectric cells with ambient white lighting is advised for best lighting practice. Bollard lighting as a primary light source is not recommended as it does not provide suitable illumination and creates an "up lighting effect" making it difficult to recognise facial features and thus increase the fear of crime. A Certificate of Competence will be required to sign off the lighting scheme.	
Natural England	No objection.	
Network Rail	After reviewing the application, I would like to inform you that Network Rail have no objections to the proposals.	
Thames Water	*Waste Comments* Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. 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. 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. . Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.	

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	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. 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. 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. 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.	

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	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. 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 to serve 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" *Supplementary Comments* Waste: We confirm that there will be sufficient capacity in our sewerage network to accept the surface water discharge rate provided as part of the enquiry, however this does not preclude the requirement as set out by Policy 5.13 of the London Plan. Management of surface water from the site should follow policy 5.13 of the London Plan, development should 'aim to achieve greenfield run-off rates' utilising Sustainable Drainage and where this is not possible information explaining why it is not possible should be provided to both the LLFA and Thames Water.	