

### Appendix 3 Internal and external consultee representations

Stakeholder	Comment	Response
<b>INTERNAL</b>		
Policy	<p>Application reference: HGY/2020/0795</p> <p>Location: Former Petrol Filling Station 76 Mayes Road N22</p> <p>Proposal: Redevelopment of the site to provide a single building of between 4 and 9 storeys in height, comprising 75 residential units (C3) and 953 sqm of flexible commercial floorspace (Use Classes A1-A5, B1 and B8), with associated cycle parking, plant, refuse and recycling provision, landscaping and all necessary ancillary and enabling works (public consultation period pending).</p> <p><u>Key Designations</u></p> <p>Wood Green Library, Site Allocation (SA11) and The Mall West (SA9 of the emerging Wood Green AAP)            Wood Green Growth Area (SP1)            Wood Green Metropolitan Centre (SP10, SA3)            Wood Green Primary Shopping Area (SP10, SA3)            Article 4 Direction – HMOs, East of the Borough (DM17)            Family Housing Protection Zone, East Haringey (DM16)            Tall Building Growth Areas, Wood Green/Heartlands (DM6)</p> <p><u>Site and Proposal</u></p> <p>The site is located at Former Petrol Filling Station, 76 Mayes Road, London, N22. The proposal is for the redevelopment of the site to provide a single building of between four and nine storeys in height, comprising 75 residential units and 953 sqm of flexible commercial floorspace, with associated cycle parking, plant, refuse and recycling provision, landscaping and all necessary ancillary and enabling works.</p>	<p>Noted.</p> <p>It is recommended that a condition tying the B8 use to the B1 use be attached to the planning permission should it be granted.</p>

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	<p data-bbox="300 235 659 264"><u>Principle of Development</u></p> <p data-bbox="300 306 1539 553">The principle of a mixed use residential and commercial development is considered acceptable in a highly accessible town centre location which is within a designated Growth Area and identified as an Opportunity Area in the Intend to Publish London Plan (2020). Policy SD1 of the Intend to Publish London Plan states that development should be prioritised within Opportunity Areas, on brownfield land, on sites which are well-connected by existing or planned Tube and rail stations, and within town centres which this site is.</p> <p data-bbox="300 599 1499 959">The Site Allocations Development Plan Document (DPD) (2017) and the emerging Wood Green Area Action Plan (AAP) give effect to the Council’s spatial strategy for Wood Green by identifying and allocating development sites. The site falls within the Wood Green Library Site Allocation (reference SA11) and The Mall (West) (reference WG SA9) in the AAP. The adopted allocation covers the Wood Green Library and Shopping Centre, as well as the Asian Centre and the Former Petrol Filling Station. Both allocations seek to deliver a new urban square and improved east west connectivity, with residential and commercial floorspace. Whilst this site only forms a part of the overall allocation, the proposed uses and active frontages would aid in the delivery of the allocations objectives for the site overall and are generally supported.</p> <p data-bbox="300 1003 1528 1391">The site is also located within a Primary Shopping Area and a Metropolitan Town Centre. The introduction of flexible commercial units would therefore be appropriate at ground and first floor levels, and is welcomed. In this regard the proposed development therefore complies with DM Policy 41 and London Plan Policy SD6, which support new commercial development within existing town centres with the aim of bolstering their vitality and viability. Given the site is not currently designated frontage, and it is located away from the primary shopping frontages the proposed range of town centre uses proposed for the western frontage (A1-A5) is acceptable. The proposal to include B1 floorspace for SMEs to be located in the dual height western elevation (termed Caxton Mews) is also supported as appropriate town centre uses in line with Local Plan policies.</p>	

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	<p>However, the inclusion of B8 use class within the flexible uses proposed is generally not a use acceptable within town centres. In light of the submitted commercial strategy which highlights that the employment space will be for maker space / artists' studios, and given the difficult commercial market an aspect of storage associated with B1 uses could be acceptable in this instance. It is recommended that this is clearly tied to those units that would require this flexibility to be attractive to the local market for creative flexible employment space. This is highlighted in the commercial strategy as being units 4-7.</p> <p>The mixed-use development of the site generally accords with the Local Plan Strategic Policies document, the adopted Site Allocation, and emerging Wood Green AAP alongside the Intend to Publish London Plan, and thus the principle of the proposal is therefore considered acceptable.</p> <p><u>Quantum of Development</u></p> <p>Policy SP1 of the Local Plan Strategic Policies document states that the Council expects development in Growth Areas to maximise site opportunities. The Wood Green Library Site Allocation (reference SA11) does not specify how many dwellings or how much commercial floorspace should be delivered at the Former Petrol Filling Station, rather the site is expected to contribute to the overall target of 358 net residential units and 2,783 sqm of commercial floorspace within the wider allocation. It is noted that the Site Allocations quanta are minimums, and therefore in this highly accessible, town centre urban location the proposed quantum of development is considered acceptable from a land-use perspective.</p> <p><u>Mix of Housing</u></p> <p>Policy DM10 of the Development Management DPD states that Council will support proposals for new housing on sites allocated for residential development, including mixed use residential development.</p>	

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	<p>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 the majority of units will be 1 and two bed, with just 14% of homes being 3+ bed units. Whilst this is low, in the context of the sites location and surroundings, this mix is acceptable. In terms of the affordable housing component, 60% affordable rent and 40% intermediate are proposed, which complies with Policy.</p> <p><u>Affordable Housing</u></p> <p>Policy H4 of the Intend to Publish London Plan outlines that the Mayor will seek to maximise affordable housing provision, setting out a strategic target for 50 per cent of all new homes delivered across London to be genuinely affordable. Policy H5 of the Intend to Publish London Plan identifies a threshold approach to major development proposals which trigger affordable housing requirements. The threshold level of affordable housing on gross residential development is initially set at a minimum of 35 per cent. The affordable housing proposal for the site represents a provision of 37% by habitable room, which is in accordance with the Intend to Publish London Plan. The threshold approach includes the 'Fast Track Route' and 'Viability Tested Route'. Applications meet or exceed the 35 per cent of affordable housing without public subsidy can follow a 'Fast Track Route'. A detailed viability assessment is not required at the application stage.</p> <p>Policy SP2 of the Local Plan Strategic Policies document seeks to ensure that housing growth across the borough makes provision for an appropriate mix of high quality housing, including affordable housing. The policy sets out the borough wide affordable housing target of 40% over the Plan period, and further detail is provided in DM Policy 13 which emphasises that the amount of affordable housing to be provided should be the maximum reasonable, but taking into account other factors including viability. As the proposal provides 37% of affordable housing it does not fully meet the 40% target, but seen in the context of it being a borough wide plan period target, and the scheme delivers the appropriate mix of affordable housing, this slight shortfall can be accepted in this instance.</p>	

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	<p><u>Active Frontages and Town Square</u></p> <p>The proposed development includes 953 sqm of flexible commercial floorspace, which will be located on the ground floor of the building facing Mayes Road and Caxton Road, and extending up to the first floor along the eastern site elevation, along a new outdoor/yard space.</p> <p>Policy DM41 of the Development Management DPD states that proposals for new retail uses within Metropolitan and District Town centres will be supported where they are consistent with the size, role and function of the centre and its catchment; sustain and enhance the vitality and viability of the town centre network. The site is not currently identified on the Council's planning policy maps as having primary or secondary frontages, but it does fall within a primary shopping area.</p> <p>The space would activate the site elevations and provide a significant uplift in employment yield at the site. The new commercial units would contribute towards the regeneration of Wood Green Town Centre by enhancing its offer and providing high quality retail space and space for SME businesses. The provision of active frontages along the eastern frontages on the area termed Caxton Mews and in the form of SME workspace would also help in the delivery of new east-west connections through the site as sought within the relevant site allocations, although noting that this will only be realised once adjacent sites redevelop. Whilst not delivering a new town square, which could only be achieved through comprehensive redevelopment of the adjacent allocated sites, the proposed scheme does offer the potential for improved east west connectivity, and is therefore broadly in line with the development guidelines within SA11 and WG SA9 and can be supported</p>	
Design	<p>Design Officer Comments</p> <p>HGY/2020/0795</p> <p>Former Petrol Filling Station, 76 Mayes Road, London N22</p>	Noted.

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	<p>Redevelopment of the site to provide a single building of between 4 and 9 storeys in height, comprising 75 residential units (C3) and 953 sqm of flexible commercial floorspace (Use Classes A1-A5, B1 and B8), with associated cycle parking, plant, refuse and recycling provision, landscaping and all necessary ancillary and enabling works</p> <p>Applicant: Caxton Road LLP  Agent: DP9  Architects: PRP Architects</p> <p><u>Site Location and Context</u></p> <ol style="list-style-type: none"> <li>1. Centre of the borough, in the heart of Wood Green, just off the High Road, just outside the Heartlands / Cultural Quarter zone but in the heart of the Haringey Heartlands / Wood Green Growth area; indeed, at the “knuckle between the two “arms” of the growth area, along the High Road and the north-south spine of Heartlands.</li> <li>2. A roughly square site with its south-western edge fronting Mayes Road, north-western edge fronting Caxton Road, and its north-eastern and south-eastern edges fronting the access ramp to the main multi-storey carpark to The Mall shopping centre. So, the site is also immediately beside The Mall, formerly Wood Green Shopping City, and originally a petrol station attached to that 1970s “megastructure” development, containing a retail mall with anchor stores, high street shops, restaurants, cinema and, immediately next to this site, an indoor stalls market, as well as offices, some homes and also immediately next to this site, above the Market and other neighbouring retail units and multi-storey car park, with its access ramp. It is architecturally striking, in a mixture of sharp, industrial red brick, bare exposed and white painted concrete and dark brown, powder coated metal glazing and cladding, in a striking, brutalist, neo-Constructivist, composition building up from 4-5 storeys to 9-10 storeys.</li> </ol>	

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	<p>3. However, the main frontage to The Mall is onto, and indeed bridging over, Wood Green High Road, and the feeling of being the back. Where fronts onto Mayes Road, south-east of this site, it is largely as a blank wall with just a couple of small, low grade retail units, and although there is an Iceland store immediately opposite, Mayes Road is otherwise a mostly residential street, fronted by two to four storey, late nineteenth century houses, set behind front gardens, although it is a broad street, with fairly busy traffic. Caxton Road is a short and narrower street, with smaller two storey residential houses along the whole side facing the site, and with the side wall and side of the back garden of the next house on Mayes Road, the more important street, presenting a mostly blank face to the southern end of this side of the site. The other half of the same side of Caxton Road as the site, after the entrance to the carpark in the middle of its length, is the recent, three storey Islamic Cultural Centre; it is architecturally undistinguished, but significantly it is built up to the pavement edge, so its two sides contrast sharply already.</p> <p>4. Caxton Road ends in a right-angled corner for vehicles, where it becomes Park View Road, a similarly modest street with two-storey residential on the left also contrasting sharply with surface parking, the rear of shops on the High Road (particularly the Morrison's supermarket) and taller flatted blocks at its northern end. Opposite the end of Caxton Road, the vista is closed by the blank rear façade of the former Post Office, which since closing last year has been used temporarily as artists' display space. It forms part of a smaller mall than The Mall, also.</p> <p>5. Mayes Road, running south-east to north-west including along the south-western frontage of this application street, is a wider street than Caxton and forms the main frontage to the site as the street network is currently laid out. It opens out onto Wood Green Common 230m north-west, where it joins Station Road midway between Wood Green Underground and Alexandra Palace National Rail stations, which themselves are some 650m and 750m away from the site. To the south-east, Mayes Road turns to become Hornsey Park Road running south to Turnpike Lane, and together form a fairly busy local distributor street, as well as being mostly of residential character and lined with mostly late Victorian, 2 and 3 storey terraced and semi-detached houses with short front gardens.</p>	

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	<p data-bbox="300 269 1539 594">6. West of Mayes Road and Hornsey Park Road the character changes to more industrial, up to the embankment of the East Coast Main Line railway some 400m west of the site. This area is currently undergoing major transformation into a mixed residential and workspace neighbourhood with higher density, higher rise developments under construction and planned. Beyond the railway, and the New River infrastructure of reservoirs and water works, character changes dramatically again, with the large public open space of Alexandra Park topped by the Palace. The park is some 950m from the site and the council is improving access to it using funds generated by development in this area.</p> <p data-bbox="300 634 642 667"><u>Planning Policy Context</u></p> <p data-bbox="300 708 1545 1105">7. The application site is an adopted site in our Site Allocations DPD (SA DPD, adopted July 2017), and in the latest draft of the emerging Wood Green Area Action Plan DPD (WG AAP, consultation draft, February 2018). In the adopted SA DPD this site is part of “SA11: Wood Green Library”, along with the Library site itself and the neighbouring Islamic Cultural Centre site between this site and the library (it also contains that bit of the car park ramp between this site and the cultural centre). The site allocation is for:  <i>“Subject to reprovion of the existing library use, redevelopment to create enhanced town centre uses, a new library, residential development, and a new urban square with pedestrian and cycle route linking Wood Green High Road to Alexandra Palace.”</i></p> <p data-bbox="363 1146 1545 1398">The allocation notes that the site “incorporates a number of uses ... [and] will create an opportunity to deliver a new central public space with active uses to form a gateway to the redevelopment sites to the west and Alexandra Palace”. Relevant Site Requirements are: active frontages [generally], a new urban square with primary town centre uses, a new connection through the site establishing a clear, visible, link from Wood Green High Road, through the new urban square, to Wood Green’s western heartland, and ground and first floor town centre uses, with</p>	

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	<p>residential above. Relevant Development Guidelines are that; the new urban square be the new civic heart of Wood Green, development heights on parts of the site directly opposite residential buildings on Caxton and Mayes Roads respecting their residential amenity, providing an attractive, safe and generous east west pedestrian and cycling connection linking into the wider cycle network, The Mall can be used as a boundary wall to the south eastern edge of the site creating a development parcel south of the new east-west route, and parking should be minimised.</p> <p>8. In the draft WG AAP this site is part of “WG SA9: THE MALL (WEST)”, along with the half of The Mall west of the High Road (also containing all of the car park ramp). The site allocation is for:</p> <p style="padding-left: 40px;"><i>“Redevelopment of existing shopping city and surrounding properties to create a refreshed town centre focussed around a new Town Square, with new mixed use development comprising of town centre ground floor uses along a new street layout, with a mix of residential and office uses above.”</i></p> <p>The allocation focusses on the potential for redevelopment of The Mall, but noes its overprovision of parking and poor urban design outlook and permeability. Site Requirements and Development Guidelines are largely the same as in the SA DPD, but also require a masterplan, sand guide that development on Mayes Rd should be residential or employment, rather than establishing a single-sided retail street opposite retained residences, with Town Centre uses opposite the current commercial frontages expected.</p> <p>9. The planning policy context also of course includes all the policies of the borough-wide Local Plan (2017) and London-wide London Plan (2016).</p> <p>10. Existing neighbouring allocated sites include the Library and Islamic Cultural Centre site and The Mall itself, adjoining to the north-east and south-east of this site. There are no approved or committed emerging proposals for these sites, but</p>	

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	<p>confidential early discussions indicate proposals are likely to come forward shortly. Not far to the north, the Morrisons supermarket, including its' and neighbouring site's large areas of surface car parking is allocation site SA10 (WG SA7). Immediately across Mayes Road from this site, on the corner of Brook Road, the Iceland Store and its large surface car park behind it forms Site Allocation SA21 (WG SA11), which has planning permission, subject to signing their Section 106 Agreement, for mixed use development of retail, workspace and health centre on the ground and first floors, residential above, in a row of four adjoined mansion blocks rising from seven to nine storeys, the tallest being at the Mayes Road corner immediately opposite this application site. On the other side of Brook Road, behind the houses facing this application site on Mayes Road, the site known as Bittern Pace also part of Site Allocation SA21 (but in the draft AAP a separate allocation WG SA17) which is currently a low rise industrial estate but for which discussions have been had regarding a higher rise mixed use development. Beyond Iceland and Bittern Place is the Former Clarendon Gasworks site allocation SA22 (WG SA18), that has approval and is currently under construction, as "Clarendon Square", for a large mixed use development including residential, retail, workspace, community uses and public parkland and open space, in a new neighbourhood of medium rise blocks rising to 18 storeys.</p> <p>11. The Council has wider strategic ambitions that significantly concern this applications site, for these developments to contribute to a coherent expansion strengthening of Wood Green Metropolitan Centre, into the "Heartlands" area of mostly former industrial land between the centre and the East Coast Main Line railway. A crucial part of this is using developments to assist in creating a strong East-West link from the High Road to Heartlands, turning off the High Road at the Library, and using Caxton Road and/or Brook Road. This site is therefore in the middle of this intended East-West Link, but is a small site that cannot on its own create the link, which cannot be realised until development of the Islamic Cultural Centre, Library and most importantly The Mall, come forward. Nevertheless, it would be unreasonable to deny the possibility of a reasonable development on this site, provided the proposals include a masterplan showing how it can fit in with</p>	

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	<p>developments on those neighbouring blocks and their continued current use, whilst supporting different likely permutations of East-West Link.</p> <p><u>Masterplan &amp; Streetscape Character</u></p> <p>12. Their masterplan proposals are shown on pages 47 to 53 of their Design and Access Statement, and show how these proposals could fit into a likely redevelopment of the neighbouring Mall, Islamic Cultural Centre and Library sites in accordance with their Site Allocations from our adopted and latest draft policy, and the approved Iceland site. The key masterplanning aspirations are the East-West Link for the High Road to Heartlands, greater east-west permeability generally, and the new “Civic Heart” on the Library/Cultural Centre site.</p> <p>13. Earlier aspirations of The Council, described in the draft AAP, contemplated a broad, reasonably straight East-West Link that as well as using these development sites, would “plough through” some of the existing houses on Mayes and/or Caxton Road, but that aspect of the council’s vision is no longer being contemplated; instead the intentions are that no existing dwellings should need to be demolished. In particular, it is recognised that many of the existing houses, including most of those on Mayes and Caxton Roads close to this application site, are good quality examples of ordinary, nineteenth century domestic architecture, as well as being much loved homes. This officer’s view is not only that retention of the existing houses alongside new buildings on non-residential sites will contribute to a neighbourhood of rich and varied character but that a good East-West Link will still be achievable using the land available and existing streets, with the continuation west of Mayes Road more likely to be via Brook Road than Coburg Road, and the masterplan prepared as part of this development demonstrates a new east-west street along or close to the edge of The Mall, which the south west face of their development would face onto, would link well to such a continuation along Brook Road, with the approved scheme for the Iceland site and the 2 storey commercial units on the south-east side of their development giving the East-West Route a continuous, vibrant, active Town Centre frontage. It is also worth noting that whilst</p>	

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	<p>approval and implementation of this application scheme would contribute strongly to the realisation of that alignment of East-West Link, it would also incidentally most probably rule out the more destructive idea for an East-West Link ploughing through the existing houses on Mayes Road.</p> <p>14. At the same time the applicants' masterplan ideas need to show they can accommodate continued use of neighbouring identified potential development sites as they are at present, or with more modest change than a comprehensive redevelopment. The proposals for the Iceland site are known. The Library and Islamic Cultural Centre and Library site is in the Council's ownership, and early ideas are being developed for this as part of the Council's accommodation strategy for intensification with reprovision of enhanced council services with other uses as well as some sort of improved public space, possibly as a town or market square. But the owners of the most important site, The Mall, have now indicated to officers they do not envisage a comprehensive redevelopment in the short or medium term, rather to do smaller developments of underused car parking, service yards and other edges of their land, generally by remodelling existing structures rather than demolishing. This application site itself was in their ownership until recently sold after being identified as being surplus to their requirements.</p> <p>15. How these proposals can accommodate existing neighbouring existing uses is covered in detail further down this document. But it is worth noting in the context of masterplanning and streetscape character how the existing Mall could change. The immediate neighbour of this site, along its north-east and south-east sides, is the ramp with cars use to access a large multi-storey car park. There appear to be areas under the ramp that are open to the site, and potentially an opening under the corner of the ramp, through to their service yard behind the Islamic Cultural Centre, currently boarded up. The wall under the ramp to the south-east of this site is onto the indoor market area of The Mall, with a service corridor between the outside wall and the stalls. The service yard is apparently underused as retail increasingly moves to just in time daily small deliveries rather than large bulk deliveries for which this was designed. The indoor market is vibrant and a crucial</p>	

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	<p>part of the Wood Green economy, but suffers from lack of visibility and an unappealing appearance exacerbated by its low ceilings and absence of natural light.</p> <p>16. This opens several possibilities as to how modest infill and alteration projects by The Mall could work with this development and the Library / Cultural Centre development and create an East-West Link. The terms of the sale by the owners of The Mall to these applicants were apparently to define the boundary between their two respective properties at a small offset from the edge of the ramp. The applicant's masterplan allows for the indoor market within The Mall to be opened up onto the yard space along the south-eastern side of this proposal, either physically or visually, possibly to spill out into the yard space, and/or to use the "undercroft" area under the ramp. If and when an infill development on the service yard comes forward, this applicant's masterplan allows the yard space to be extended under the ramp into the service yard area, which could become a pedestrian street extending through to The High Road and opening onto the planned Civic Heart.</p> <p>17. Therefore the inevitable conclusion is their site be treated as an "island", with potentially a public street frontage, onto a vibrant town centre type street, is a distinct possibility on all four, or certainly three sides (the one that is least likely being the north-eastern side onto the lower part of the car park ramp. The present situation is that its Mayes Road frontage is the most important, and that is likely to remain a street of fairly high importance, with a mixture of residential, employment and town centre functions and a need to have an active frontage. The likely potential future outcome is that the south-eastern side of their site will become the main East-West Link, from Wood Green Town Centre to Heartlands and beyond, but in the short to medium term it will merely face the blank flank wall of The Mall. The proposed 2 storey workspaces, with double height frontages and windows, will mark and animate this frontage and be flexible enough to accommodate both immediate and various possible future settings. This East-West Link would continue across Mayes Road at this point and thence along Brook Road, and the southern corner of this development will partially close the vista along Brook Road.</p>	

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	<p>Hence the primary corner of the scheme is it's southern corner, which is treated as a high point, a local landmark, with a prominent two storey base, marking and turning the corner of Mayes Road and the future East-West Link.</p> <p><u>Form, Pattern of Development, Bulk &amp; Massing</u></p> <p>18. The proposals are for a courtyard, podium block, with the four blocks enclosing a central space at 1st floor level, with the whole of the site being built on at the ground floor. People in the courtyard can have glimpses out (and people in the street have glimpses into the courtyard) through two gaps between the block along the north-western side of the site and those along the north-eastern and south-western sides, and the four sides rise to different heights; the lowest, north-western side to 4 storeys (3 storeys from the courtyard, the north-east and south-west sides to 7 storeys (6 from the courtyard – with the north-east side losing another floor at its north-western end, to 5 storeys from the street), and the highest south-eastern side to 9 storeys (8 from the courtyard).</p> <p>19. This gives the proposals a modelled form from the outside, that responds to the differing nature of the surrounding context and reflects the transition from the 2 to 4 storey context to the north-west and the 8 storey plus context (with higher floor-ceiling heights in their commercial floors) of the existing Mall/Sky City and emerging proposals for other neighbouring major development sites. This is an appropriate response in this location with urban character that inevitably has low rise nineteenth century suburban housing cheek by jowl with a high intensity metropolitan town centre of a central character, as the London Plan defines character and as the council's Urban Character Study confirmed.</p> <p>20. The gaps along the north-east façade, onto the quieter, narrower, lower-rise and more residential Caxton Road streetscape, will break up the grain and rhythm of this street frontage, which will add to the lower height of the proposal along this street in giving it a lower impact here.</p>	

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	<p data-bbox="300 233 1306 264"><u>Elevational Treatment, Fenestration, including Balconies, and Materials</u></p> <p data-bbox="300 305 1537 594">21. The proposed modelling and massing concept is carried through into the proposed material choices, fenestration pattern and elevational composition. They propose a palette of three contrasting complimentary bricks, used on three contrasting elements, appropriate for their situations and chosen to compliment and reference existing local context. This is combined with window shape and proportions based on local precedent, with detailing such as window reveals and balcony balustrading appropriate to function as well as picking up on existing local and nearby detailing including the window patterns in the Great Rose Window of Alexandra Palace.</p> <p data-bbox="300 597 1537 886">22. Two different brick colours are proposed for the outside elevations; a darker brick based on colours of bricks typically found in the town centre, used to define the key corners of the development onto Mayes and Caxton Roads, and a lighter brick based on houses typically found in surrounding quieter streets, used to create variety and visually slim the tallest element. A third brick for the courtyard, which are contrasted further with an off white brick to the internal courtyard walls, which will reflect light into the courtyard and create an interesting, striking detail at corners, providing a hint of the courtyard from the street.</p> <p data-bbox="300 927 1524 958">Residential Quality (flat, room &amp; private amenity space shape, size, quality and aspect)</p> <p data-bbox="300 998 1486 1070">23. All maisonette, flat and room sizes comply with or exceed minima defined in the Nationally Described Space Standards, as is to be routinely expected.</p> <p data-bbox="300 1110 1533 1289">24. All dwellings meet or exceed the private external amenity space in the London Plan, with private balconies or roof terraces. Privacy of amenity space is achieved by many balconies being recessed, and those that are not being at least partially solid balustraded. Many flats have larger roof terraces, exploiting the design which permits roof terraces in the steps in the blocks.</p> <p data-bbox="300 1330 1520 1401">25. There are no single aspect flat in the whole development; this is a major benefit of the relatively tight courtyard layout with “deck access” chosen here. All flats are at</p>	

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	<p>least dual aspect, many triple aspect, an amazing and exemplary achievement in such a high density urban development (although perhaps more typical in high density, low rise mews type developments than in developments of large blocks).</p> <p>26. There is also access to doorstep private communal amenity space, including doorstep playspace, within the development. There are three private communal external amenity spaces; the 1st floor podium courtyard and two roof terraces, both at 7th floor, covering almost the whole of the roofs of the north-eastern and south western blocks (the former being slightly larger than the latter). The podium courtyard will be a busy space, with all circulation, all access to all dwellings, coming through it off the ground to first level single large generous entrance, stair and lift (which only go from street level to podium). It will not be a sunny space (see below), but will be vibrant and a good social mixing point, the ideal place for “on the way” incidental playable landscape.</p> <p>27. The two roof terraces are accessed off each of the two cores. They will both be very sunny, landscaped with a variety of destination leisure spaces including play space, and benefit from splendid views including of Alexandra Palace, whilst being well over the rooftops of existing neighbouring houses (therefore being of no privacy/disturbance concern). As they are laid out with one lift and stair core accessing each terrace, they could be managed separately, if each core is separately managed with separate entrance controls, or could both be accessible to all residents if both cores are accessible to all residents or if the access deck at this level are made to run through between both cores. Both arrangements, where all residents can use both terraces, or where only those residents off each core can use each terrace, would be policy compliant, since housing policy accommodates the request of many affordable housing providers to have separate cores for separate management issues.</p> <p><u>Privacy / Overlooking of Proposed Residents and Existing Neighbours</u></p>	

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	<p>28. There are only minor concerns at privacy or overlooking of existing neighbours directly facing windows in the development. All neighbours are on the other side of streets; there are no cases where this development is looking at the back gardens and rear elevations of houses, where residents would have a greater reasonable expectation of privacy, except in the case of the flank view of no 86 Mayes Road, across Caxton Road. In this one case, that rear elevation is already visible from Caxton Road itself, and benefits form significant screening from existing trees, which will also screen those dwellings from this development.</p> <p>29. Distance provides further privacy, given that the human face cannot be recognised over 18m away, so that a distance of 20m+ is considered to provide adequate privacy. The width of the surrounding streets provide additional privacy to existing neighbours from this development, as Mayes Road is well over 20m wide, with the existing houses set back further behind front gardens, and although Caxton Road is slightly under 20m wide, the existing houses are well set back behind long front gardens of a further 10m+ length.</p> <p>30. Within the development, most of the proposed habitable rooms face out, away from each other; only those that face into the central courtyard will be able to look at each other. These will inevitably loose privacy from neighbours using the access balconies, although the courtyard's width, at over 20m, and the placing of non-residential close to the internal corners on one side of each corner, means they will not overlook between residents' windows. Privacy is improved by moving the access balconies away from the face of the building, and adding planting beds, but it has to be recognised that the affected windows are in all cases kitchens or second bedrooms, never living rooms, and that people passing will always be transitory, not prolonged.</p> <p>31. With regards to privacy from the public realm, the whole of the residential accommodation s raised up at least 1st floor level, with on the southeast side, at least at 2nd floor level, so there will be no loss of privacy to residents from the street, or even from the ramp to the car park, which will always be below window cill</p>	

Stakeholder	Comment	Response
	<p>levels of adjacent flats, with flats facing the ramp at the lowest applicable levels being carefully designed to have their primary windows facing away from or being well above the ramp.</p> <p><u>Daylight and Sunlight</u></p> <p>32. Of relevance to this section, Haringey policy in the DM DPD DM1 requires that:  <i>“...D Development proposals must ensure a high standard of privacy and amenity for the development’s users and neighbours. The council will support proposals that:</i></p> <ul style="list-style-type: none"> <li><i>a. Provide appropriate sunlight, daylight and open aspects (including private amenity spaces where required) to all parts of the development and adjacent buildings and land;</i></li> <li><i>b. Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and residents of the development...”</i></li> </ul> <p>33. The applicants provided Daylight and Sunlight Report on their proposals and of the effect of their proposals on neighbouring dwellings. These have been prepared fully 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”.</p> <p>34. The assessment finds that the impact of the development on existing neighbouring residential properties is generally favourable for both daylight and sunlight, with only six neighbouring existing residential properties found to lose a noticeable amount of daylight, and no neighbours losing a noticeable amount of sunlight. The six properties that would lose a noticeable amount of daylight to any of their windows are no 3 Caxton Road (to one window), no. 1 Caxton (2 windows), no. 86 Mayes Road (to 3 windows; these 3 properties being opposite the site over Caxton</p>	

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	<p>Road), and to 63-67 Mayes (neighbouring houses opposite the site over Mayes Road; to 13 of 16 windows).</p> <p>35. In all cases these houses or flats are at least dual aspect (no 86 is triple aspect), with their other aspects unaffected, and they currently benefit from the highly unusual situation of having a vacant site opposite them. All the affected windows would retain Vertical Sky Components (VSC) of over 20%, where 27% is the recommended level in the BRE Guide, and levels over 20% are considered good the losses are generally only to 60 or 70% of their current value (where 80% is considered not noticeable), only one as low as 50%, and generally their No Sky Line (NSL) does still meet the BRE Guide recommended levels.</p> <p>36. The applicants' assessment also finds the proposals would achieve good levels of daylight to the proposed dwellings. They find that all the Living Rooms meet the standard recommended in the BRE Guide, including all the open plan Living/Dining/Kitchens meeting the higher kitchen standard, 90% of bedrooms meeting the bedroom standard, and only the separate kitchens not meeting the BRE daylight standard. For sunlight where the BRE Guide standard applies only to living rooms facing within 90° of due south; all those meet the standard, but they point out that 69% of living rooms do not face south. It is worth pointing out that in all flats where their living room does not face within 90° of due south, they will have other rooms that do face within 90° of due south, and that all residents have access to outdoor amenity spaces, some of which will get very large amounts of sunlight.</p> <p>37. In the case of the outdoor amenity spaces, two of the spaces, the two roof terraces, receive exceptionally high levels of sunlight, with just the central podium courtyard not meeting the BRE Guide standard. This space was never likely to be a sunny space, and it is not unreasonable in a development with a variety of external amenity spaces for one of the three to be a more shady space, especially as this space will have busy circulation crossing it; with all residents entering it before going into their flats or up to their floor, and it being likely to receive a lot of artificial light spillage (unlike the two roof terraces).</p>	

Stakeholder	Comment	Response
	<p>38. 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 and the fact that it is very nearly achieved here is considered an excellent performance.</p> <p><u>Conclusions</u></p> <p>39. This is a challenging site, with a number of constraints from existing neighbours and potential surrounding developments, and a certain uncertainty as to what its eventual neighbours to the east will be. However, the proposals have managed triumphantly to devise a scheme that could sit within the site as it is at present, provide an encouragement to improvements to the neighbours, especially the potential for opening up the dead and underused spaces and sides of The Mall and still accommodate longer term future plans.</p> <p>40. The proposed accommodation would provide good quality homes, with access to good quality private amenity space, and high levels of privacy, sunlight and daylight, which is impressive especially in the context of this becoming part of the town centre of Muswell Hill. At the same time, the proposals promise to provide good quality workspace and retail ground floor uses, including part 2 storey, and including the interesting and promising yard space idea for the potentially awkward space between the development and the space beside and underside of the ramp.</p>	

Stakeholder	Comment	Response
	<p>The architectural form, composition and materials also promised to be of a high quality and appropriate to the location and context.</p>	
Transport	<p><u>HGY/2020/0795 - Filling Station 76 Mayes Road London N22</u></p> <p><i>Redevelopment of the site to provide a single building of between 4 and 9 storeys in height, comprising 75 residential units (C3) and 953 sqm of flexible commercial floorspace (Use Classes A1-A5, B1 and B8), with associated cycle parking, plant, refuse and recycling provision, landscaping and all necessary ancillary and enabling works</i></p> <p><u>Application proposals</u></p> <p>This application seeks to redevelop the former petrol filling station site on the corner of Mayes Road and Caxton Road within Wood Green Town Centre.</p> <p>75 residential units are proposed and are to be located from the first floor up.</p> <p>The 952 sqm of commercial floor space will be located on the ground floor, with commercial units facing onto both Caxton and Mayes Roads.</p> <p>A gated outdoor 'yard' type space is also proposed, to the eastern and northern sides of the development adjacent to the western side of the Mall, where smaller commercial units are proposed. It is intended that these are available/accessible in the short term for residents and occupiers of the commercial units, and should later part redevelopment of the Mall take place, this space/passage could eventually become a route connecting to the town centre. This would align with the aspirations of the SA11 site allocation.</p> <p>It is also proposed to set the building line back by 1.8m from the current boundary/Highway boundary to enable a widening of the footway/public realm to the perimeter of the development.</p> <p>The development is proposed as a 'car free' development.</p>	<p>Noted.</p> <p>The recommended s106 obligations, s278 agreement and conditions will be included with any grant of planning permission.</p>

Stakeholder	Comment	Response
	<p><u>Location</u></p> <p>The site is located on the corner of Caxton Road and Mayes Road in Wood Green. It has a PTAL value of 5, considered 'very good' access to public transport services. 7 bus services are accessible between 6 to 8 minutes' walk away, Wood Green Underground Station is an 8 minute walk away, and Alexandra Palace National rail station an 11 minute walk away. The site is also located within the Wood Green Inner CPZ, which operates Monday to Sunday, between 0800 – 2200.</p> <p>This site is within the larger SA11 strategic site allocation.</p> <p>To the north and east sides of the site, the Site is bound by a vehicle ramp serving the Wood Green Mall main car park, with the main shopping centre located beyond, to the east. To the north, beyond the vehicle ramp, is a community centre and to the west the Site is bound by Caxton Road, with residential properties on the opposite side of the road. The Site is currently hoarded but is accessed from Mayes Road by way of two vehicular crossovers, with a further vehicular crossover also provided on Caxton Road</p> <p><u>Transportation considerations</u></p> <p>A Transport Assessment accompanies the application. From the transportation perspective, there are the following comments:</p> <p><u>Access arrangements</u></p> <p>Pedestrians and cyclists will be able to enter the building from Caxton Road, and the commercial units will be accessible from both Caxton and Mayes Roads. All vehicle related activity such as servicing and refuse/recycling collections will be taking place from Caxton Road.</p> <p><u>Trip generation and distribution</u></p>	

Stakeholder	Comment	Response
	<p>For the residential component, The TA details that 8 inbound and 39 outbound trips are predicted for the AM peak and 12 outbound/24 inbound for the PM peak. Given the car free nature of this development, the bulk of the residential trips are by public transport.</p> <p>Regarding the commercial/retail component, it is predicted that there will be 100 – 130 arrivals and departures in both peaks, and a 12 hour trip total of over 1500 arrivals and departures. The mode shares are predominantly for walking with the remainder being by public transport.</p> <p><u>Highway and public realm arrangements to access the site</u></p> <p>The applicant proposes to bring the building line back by 1.8m from the current edge of footway to enable a widening of the public realm to the perimeter of the development. It is however noted that the doors are all shown opening outward onto this ‘new’ area of public realm. Ideally these should not open outward into the areas where pedestrians will be walking and moving and this should be changed. It is expected that these new areas of public realm created by pulling back the building line will not be designated as public highway.</p> <p>In addition to this there are currently three highway crossovers servicing the site, two on Caxton Road and one on Mayes Road.</p> <p>In this application, the initial proposal was to reinstate the two crossovers on Caxton Road and retain a modified crossover off Mayes Road for servicing. Highways and Transportation officers however had considerable concerns with this proposed arrangement.</p> <p>There are, and will be, increasing pedestrian flows using Caxton and Mayes Roads and this part of the town centre, particularly from the development sites within the Haringey Heartlands area and other new developments in the locality as they get built out. The route for many pedestrians from these sites is along Brook Road then making a</p>	

Stakeholder	Comment	Response
	<p>diagonal crossing of Mayes Road to progress along Caxton Road, to get to the town centre.</p> <p>There is accident history relating to pedestrians using this route, particularly the diagonal crossing of Mayes Road made by pedestrians between Brook/Caxton, and there are sensitivities regarding this and the quality of the environment that should be delivered in the near future.</p> <p>The recent COVID19 situation and focus on improved pedestrian environments and public realm has further exacerbated these, given the need to provide a spacious and high quality pedestrian environment, and what is envisaged will be a flat top raised crossing at this location on Mayes Road to meet the desire lines between developments to the west and the town centre. The Highways Team are to be working up a scheme to meet these objectives, and the service demands for the PFS site development will have to be fully met kerbside from Caxton Road.</p> <p>As a result of discussions between Transportation officers and the applicant's transport consultant, the applicant's proposal has been amended to remove the proposed vehicle crossover from Mayes Road, so all delivery and servicing activity will be undertaken from kerbside in Caxton Road.</p> <p>Overall, the applicant will need to enter into a S278 Agreement under the Highways Act to cover the proposed changes to the highway arising from this development, It is expected that the S278 works will include the pedestrian crossing proposed for Mayes Road and the associated changes arising from the scheme in Caxton Road. At the time of drafting the response there is no outline estimate available for this scheme.</p> <p><u>Parking considerations</u></p> <p>The development is proposed as a car free development, taking into account the very good access to public transport services and town centre type location. In principle this</p>	

Stakeholder	Comment	Response
	<p>is both appropriate and acceptable, and accords with current transportation policies in the London Plan.</p> <p>The applicant has provided a Parking Stress Survey within the TA. This recorded parking conditions in the locality of the site during the traditional overnight period for considering residential parking demand and the daytime scenario.</p> <p>The overnight surveys recorded parking stresses in the formal CPZ bays at 60%, with 23 spaces available of the 58 CPZ bays. Occupancy for the pay and display bays was also recorded and overnight, there were 24 spaces available not taking into account single yellow line availability. The daytime surveys recorded a higher level of on street parking, however the main parking considerations relate to the overnight scenario for residential demands.</p> <p>Under the London Plan, there is a requirement for the provision of blue badge bays. The London Plan specifies for a minimum of 3% provision from the outset of a new development, which would be 3 spaces. There is a further requirement for a development to have the ability to provide 10% blue badge provision in total which would be 8 spaces. As submitted the development does not provide this. At present there is a single blue badge bay at the top end of Caxton Road.</p> <p>The applicant will need to propose locations for and meet the costs of locating and implementing three on street blue badge bays to be provided prior to occupation of the development, most likely to be achieved by converting existing standard bays or length of bay in close proximity to the development site. This will ensure that the London Plan minimum requirement of 3% is met from the outset with additional blue badge bay availability in the locality of the site. It should also be noted that blue badge holders are able to park within standard CPZ bays and on single yellow lines.</p> <p>It will also be necessary for the applicant to investigate and propose acceptable locations to provide the additional 5 blue badge bays to meet the 10% longer term requirement within the London Plan. This needs to be done for approval and agreement</p>	

Stakeholder	Comment	Response
	<p>prior to occupation of the development so that additional space locations to meet demand have been identified and agreed. Funding to deliver these will be required and included within the S106 Agreement.</p> <p>The parking stress surveys recorded 24 spaces available on the overnight surveys, which would indicate a reasonable amount of spare capacity in the locality of the site. Therefore, any likely demands from the 8 fully accessible units should be able to be met from new blue badge bays and additional demands from the residual spare capacity on the public highway in the locality of the development site.</p> <p>The development will of course be appropriate for formal designation as a car free/permit free development, and the applicant will need to enter into the appropriate Planning Agreement to cover this and meet all of the Council's administrative costs (£4000). In addition to this two of the new on street spaces should be provided with charging infrastructure to enable electric vehicle charging.</p> <p>Overall, it is considered that with the very good accessibility to public transport services, location close to the town centre, low provision of family sized units and permit free status, parking demands will be minimal, and that there will be appropriate on street provision of additional blue badge bays and residual parking capacity to meet the demands from blue badge holders in the fully accessible units.</p> <p><u>Cycle parking</u></p> <p>It is proposed to provide 138 long stay cycle parking spaces for residents, to be located within dedicated cycle stores on the ground floor of the building. It is proposed that these will be accessible via push pad entry type security arrangements or similar. The applicant also references electric socket provision for e-bike charging and space for a small number of inclusive bikes such as tricycles, handcycles and cargo bikes with at least 5 per cent of all spaces being capable of accommodating a larger cycle).</p>	

Stakeholder	Comment	Response
	<p>An additional 10 short stay spaces are proposed for the residential component, plus a further 9 cycle spaces are provided for the commercial element.</p> <p>The proposed provision does meet the numerical requirements of the draft/forthcoming London Plan. However full details of the proposed cycle parking will need to be provided for review and consideration. Given the development is proposed as a zero parking site, the cycle parking needs to be of the highest quality, with ease of use and convenience to encourage occupiers and visitors to use cycles. The details that will be needed include the manufacturer’s specifications for installation, spacing and headroom, and scaled drawings showing sufficient area and room height to accommodate the cycle parking systems when in full use. The same details are required for the visitor cycle parking including dimensions and layout.</p> <p>Ideally all of the above details should have been provided for review of this application. The details can however be covered by a condition, for approval prior to commencement of the works for the development.</p> <p><u>Delivery and servicing arrangements/ Refuse and recycling collection arrangements</u></p> <p>The TA details a typical daily regime of 16 arrivals and 16 departures for delivery and servicing movements to the site. It is proposed that 11 of these will be related to the residential component, and 5 to the commercial/retail.</p> <p>As commented above, the original proposal from the developer was for servicing to take place primarily from the Highway in Caxton Road, plus have a component of servicing taking place internally via a relocated crossover off Mayes Road. These proposals have now been revised as described earlier in this response.</p> <p>The applicant’s Transportation consultant has provided swept path details demonstrating that residual traffic along Caxton Road can pass a stationary refuse collection vehicle so this should work satisfactorily with respect to servicing. The reinstatement of redundant crossovers will enable longer kerbside to be provided and in</p>	

Stakeholder	Comment	Response
	<p>addition to this, the applicant will need to employ 'light touch' servicing where arrivals and departures take place outside of the AM/PM peaks and conventional working day so as to reduce impacts on the highway and public realm during the busier periods of the day . An updated Delivery and Servicing Plan will be required that reflects the above changes to the initially proposed regime and includes the agreed hours for development servicing.</p> <p><u>Active travel and site connectivity</u></p> <p>As detailed earlier in this response, the development will provide an improved streetscape and public realm to the perimeter of the site, either via the S278 process or by financial contribution for implementation of a later scheme.</p> <p>In addition to this, the development should contribute towards the provision of improved connectivity to promote and enable the uptake of active travel to and from the development, the town centre and public transport services, and the improvement of active travel mode shares to meet both travel plan targets and the aspirations of the Mayor's Transport Strategy.</p> <p>There are a number of schemes and interventions being developed by the Council to do this, including for Caxton Road and Caxton Mews, Mayes Road, Brook Road and Hornsey Park Road. A contribution of £30,000 towards these schemes is considered appropriate and can be covered by the S106 agreement.</p> <p><u>Car Club provision</u></p> <p>The applicant has proposed potential provision of an additional car club bay in the locality of the site. There are existing car club bays in Parkland Road. The applicant should engage with the local car club operator and obtain their written recommendations for car club provision at this development. It is expected that as a minimum, the recommendation will be for a couple of new car club spaces/vehicles on street to meet demands from this site and increasing area demands, along with car club membership</p>	

Stakeholder	Comment	Response
	<p>to be funded by the applicant for three years for each residential unit. This can be covered in the S106 agreement.</p> <p><u>Construction period</u></p> <p>A draft Construction Traffic Management Plan has been included in the application. This proposes the main topics to be included in a formal Construction Logistics Plan, for which a detailed draft will be required for review and approval prior to commencement of the works. The scoping for this will need to be agreed with Transportation and Highways/Network Management Officers, and it will need to discuss and detail the measures to be taken to minimise, manage and mitigate impacts on adjacent neighbours and the safe and smooth operation of the public highway in the locality of the development site.</p> <p>It is noted that it is expected to take 18 months to build out the development, and the outline plan references all of the appropriate topics and headings for a fully detailed CLP. It is suggested that the applicant engage directly with the Council's Network Managers to discuss any specific issues relating to routeing and any temporary measures on the highway considered necessary for the construction.</p> <p>A CLP monitoring fee of £3000 will be appropriate to cover the Council's costs in reviewing, administering and actively monitoring the transport and highways aspects of the build out of the development to ensure effective network management.</p> <p><u>Travel Plan statement</u></p> <p>The basis of a Travel Plan Statement has been included within the TA, this lists the proposed content of the statement. A worked up version can be delivered and covered via the S106 agreement, to meet the prescribed mode share target of 8% for cycling. More details of the requirements are at the end of this response.</p> <p><u>Summary</u></p>	

Stakeholder	Comment	Response
	<p>This application seeks to redevelop the former petrol filling station site on the corner of Mayes Road and Caxton Road within Wood Green Town Centre, to provide 75 residential units and 952 sqm of commercial floor space.</p> <p>The development is proposed as a 'car free/permit free' development and in principle this is appropriate and acceptable subject to formal designation as a permit free/car free development. No off highway blue badge parking is proposed, which does not meet the requirements of the London Plan, so it will be necessary for the applicant to provide 3 spaces on street to meet the lower 3% threshold required from occupation of the development, and propose and fund appropriate locations for another 5 spaces to meet the 10% London Plan target and potential future demands. The Parking Stress Survey recorded spare parking capacity available in the locality of the site, which should comfortably accommodate any parking demands arising from the standard units in the development however these are expected to be minimal.</p> <p>Cycle parking has been proposed to numerically meet the requirements of the forthcoming/draft London Plan, with the appropriate amounts of parking for larger cycles and the like. Subject to sight of full details, this will be acceptable. The servicing arrangements have evolved during the consideration of the application and all servicing will now take place from the kerbside in Mayes Road. A Delivery and Servicing Plan will be required to cover the changes including the permitted hours for loading activity.</p> <p>A number of changes to the public highway will result from the development, including the reinstatement of redundant crossovers, changes to on street waiting and loading restrictions, and the applicant will need to enter into a S278 agreement to cover these. It is also considered appropriate that this process includes provision of the improved pedestrian crossing facility proposed for Mayes Road and an improved public realm along Caxton Road. As an alternative to delivery via the S278 process, the applicant could make a financial contribution to the Highways works to deliver these measures.</p>	

Stakeholder	Comment	Response
	<p>Contributions towards other schemes and initiatives that are being developed to improve connectivity to and from the site and wider area to Wood Green Town Centre are also considered appropriate to contribute towards achieving travel plan and Mayoral Targets for active travel.</p> <p>In balance, Transportation support the application subject to the following;</p> <p><u>S106 requirements:</u></p> <p><u>1. Car-free Development</u></p> <p>The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as “car free” and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose.</p> <p><u>2. Travel Plan (Residential)</u></p> <p>Within six (6) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses shall have been submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of active travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan in order to maximise the use of active travel modes and public transport:</p> <p>a) The developer must appointment of a travel plan co-ordinator, working in collaboration with the development Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years.</p>	

Stakeholder	Comment	Response
	<p>b) Provision of welcome induction packs containing public transport and cycling/walking information like available bus/rail/tube services, map and timetables, to every new resident.</p> <p>c) Establishment or operate a car club scheme, which includes the provision of 2 car club bays and two cars with, two years' free membership for all residents and £50.00 (fifty pounds in credit) per year for the first 2 years. Car club operator to advise as required.</p> <p>d) The travel plan must include specific measures to achieve the 8% cycle mode share by the 5th year.</p> <p>e) The applicants are required to pay a sum of, £2,000 (two thousand pounds) per year for 5 years for monitoring of the travel plan initiatives.</p> <p>Reason: To enable residential occupiers to uptake active travel modes and sustainable transport options.</p> <p><u>3. Travel Plan (Work Place)</u></p> <p>A Work Place travel plan must be secured by the S.106 agreement. As part of the travel plan, the following measures must be included in order to maximise the use of active travel modes and public transport.</p> <p>The applicant submits a Works place Travel Plan for the commercial aspect of the Development and appoints a travel plan coordinator who must work in collaboration with the Facility Management Team to monitor the travel plan initiatives annually for a period of 5 years and must include the following measures:</p>	

Stakeholder	Comment	Response
	<p>a) The applicant will be required to provide, showers lockers and changing room facility for the work place element of the development.</p> <p>b) The developer is required to pay a sum of £1,000 (two thousand pounds) per year per travel plan for monitoring of the travel plan for a period of 5 years. This must be secured by S.106 agreement.</p> <p>Reason: To enable employees to uptake active travel modes and sustainable transport options.</p> <p><u>4. Sustainable and active travel contribution</u></p> <p>We will require the applicant to make a financial contribution of £30,000 by way of the S.106 agreement towards a package of measures to improve the walking and cycling conditions on the following key routes:</p> <ol style="list-style-type: none"> <li>1. Caxton Road/Caxton Mews</li> <li>2. Mayes Road</li> <li>3. Brook Road</li> <li>4. Hornsey Park Road</li> </ol> <p>Reason: To promote travel by active travel modes in line with the London Plan and the Council's Local Plan SP7 and the Development Management DMPD Policy DM 32.</p> <p><u>5. Section 278 Highway Act 1980</u></p> <p>The owner shall be required to enter into agreement with the Highway Authority under Section 278 of the Highways Act to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, reinstatement of redundant crossovers, alterations to carriageway arrangements, associated street furniture relocation, carriageway markings, and associated traffic regulation order</p>	

Stakeholder	Comment	Response
	<p>changes. Unavoidable works required to be undertaken by Statutory Services will not be included in the Highway Works Estimate or Payment.</p> <p>In addition, the developer will be required to provide details of any temporary highways scheme required to enable construction or occupation of each phase of the development, which will have to be costed and implemented independently of this cost estimate. The cost of the S.278 works have been estimated at £TBC and must be indexed linked and reviewed annually or before the implementation of each phase of the highway works.</p> <p>Reason: To implement the proposed highways works to facilitate future access to the development site.</p> <p><u>6. Construction Management Plan (CMP) and Construction Logistics Plan (CLP)</u></p> <p>The applicant/ Developer is required to submit a Construction Management Plan (CMP) and Construction Logistics Plan (CLP) for the local authority's approval 3 months (three months) prior to construction work commencing on site. The Plans should provide details on how construction work (Inc. demolition) would be undertaken in a manner that disruption to traffic and pedestrians on Brook Road, Western Road, and the roads surrounding the site is minimised. It is also requested that construction vehicle movements should be carefully planned and coordinated to avoid the AM and PM peak periods, the plans must take into consideration other site that are being developed locally and were possible coordinate movements to and implement also measures to safeguard and maintain the operation of the local highway network.</p> <p>A monitoring fee of £3000 will be required to meet the Council's costs in officer time for review of construction access proposals and management of the public highway during the build out period.</p> <p>Reason: to ensure that the impacts of the development proposal on the local highways network are minimised during construction.</p>	

Stakeholder	Comment	Response
	<p><u>7. Parking Management Plan</u></p> <p>The applicant will be required to provide a Parking Management Plan which must include details on the proposed locations for 3 blue badge space on the public highway in the locality of the site, that will be in place prior to occupation of the development.</p> <p>In addition to this the applicant must propose and agree locations for 5 further blue badge bays on the public highway and provide funding for their implementation to meet demands from the development as required.</p> <p>Reason: To ensure that the provision of on street car blue badge parking bays meets the requirements of the London Plan.</p> <p><u>Conditions</u></p> <p><u>1. Cycle parking Design and Layout</u></p> <p>The applicant will be required to provide full dimensional details of the proposed arrangements for cycle parking to ensure that the correct number of cycle parking spaces in line with the London Plan is provided and so that the cycle parking provided will be easy to access and use and meet manufacturer’s installation specifications. In addition to this the cycle parking spaces should be designed and implemented in line with the 2016 London Cycle Design Standard.</p> <p>Reason: To promote travel by sustainable modes of transport and to comply with the London Cycle Design Standard.</p> <p><u>2. Electric Charging Points</u></p> <p>The applicant will be required to provide a total of 2 on street blue badge car parking spaces with active electric charging points</p>	

Stakeholder	Comment	Response
	<p>Reason: To comply with the Further Alteration to the London Plan and the London, and reduce carbon emission in line with the Council's Local Plan Policy SP4.</p> <p><u>3. Delivery and Servicing Plan and Waste Management Plan</u></p> <p>The owner shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The service and deliver plan must also include a waste management plan which includes details of how refuse is to be collected from the site, the plan should be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying distances of a refuse truck on a waste collection day.</p> <p>Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway</p>	
Housing	<p>The quantum and layout of the affordable housing is acceptable to the Housing Team and we note the increase in intermediate homes to allow for the delivery of some social rented homes.</p> <p>It is also noted that the design is tenure neutral and that the Affordable Housing and Private Housing is located in different blocks. This is positive for housing management which is likely to be by a different organisations and should also make the rented and intermediate homes more affordable by managing the service charges.</p>	<p>Noted.</p> <p>S106 obligations will be included with any grant of planning permission to secure affordable housing provision.</p>
Energy and Carbon Management	<p>In preparing this consultation response, we have reviewed the Energy Strategy Report (dated 24 April 2020), Overheating Assessment (Version 02, dated 9th March 2020), BREEAM 2018 Pre-Assessment Report (dated 15th March 2020), and Sustainability Statement (dated 24th April 2020) all prepared by JAW Sustainability, and relevant supporting documents.</p>	<p>Noted.</p> <p>The recommended conditions and s106 obligations will be included</p>

Stakeholder	Comment	Response												
	<p><b>Summary</b></p> <p>The development does not meet the policy requirement to achieve a zero-carbon development on site. Further information needs to be provided in relation to the energy strategy, and concerns need to be addressed for the overheating assessment and sustainability report. This should be addressed prior to the determination of the application or should be addressed through planning conditions.</p> <p><b>Energy – Overall</b></p> <p>Policy SP4 of the Local Plan Strategic Policies requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013)). The Intention to Publish version of the New London Plan (2019) further confirms this in Policy SI2. As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.</p> <p>The overall predicted reduction in CO2 emissions for the development, from the Baseline development model (which is Part L 2013 compliant), shows an improvement of approximately 69% in residential carbon emissions and 39% improvement of commercial emissions. However, this is based on SAP10 factors and should be recalculated with SAP2012 carbon factors to take into account connection to the Decentralised Energy Network (DEN).</p> <table border="1" data-bbox="300 1109 1528 1416"> <thead> <tr> <th></th> <th>Residential</th> <th>Non-Residential</th> </tr> </thead> <tbody> <tr> <td><b>Baseline emissions</b></td> <td>77.16</td> <td>8.39</td> </tr> <tr> <td><b>Cumulative savings: Be Lean, Be Clean and Be Green</b></td> <td>53.1</td> <td>3.3</td> </tr> <tr> <td><b>% improvement</b></td> <td>69%</td> <td>39%</td> </tr> </tbody> </table>		Residential	Non-Residential	<b>Baseline emissions</b>	77.16	8.39	<b>Cumulative savings: Be Lean, Be Clean and Be Green</b>	53.1	3.3	<b>% improvement</b>	69%	39%	<p>with any grant of planning permission.</p>
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Stakeholder	Comment		Response	
	Carbon shortfall to offset	24.05	5.09	
<p>The remaining carbon emissions will need to be offset at £95/tCO<sub>2</sub>. A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built.</p>				
<p>The applicant should present two carbon reduction table scenarios:</p>				
<ul style="list-style-type: none"> <li>• Scenario 1: Connection to the DEN scenario (residual tCO<sub>2</sub> over 30 years)</li> <li>• Scenario 2: Communal heating and gas boilers (residual tCO<sub>2</sub> over 30 years)</li> </ul>				
<p>Two carbon offset payments will be calculated. The carbon offset contribution for scenario 1 will be due at the commencement of development and the difference in the offset contribution between the first and second scenarios will be deferred for 10 years and indexed accordingly.</p>				
<ol style="list-style-type: none"> <li>1. Payment for the residual emissions in the DEN scenario (Scenario 1) would be due at commencement of development.</li> <li>2. A deferred carbon offset contribution is calculated through the difference in the offset contribution: Scenario 2 – Scenario 1 = Deferred Payment.</li> <li>3. If, after 10 years the development has <u>not</u> connected to the DEN, the deferred payment (+indexation) is due.</li> <li>4. If, after 10 years the development has connected to the DEN, the deferred payment would not be due but this amount would be available as a connection charge to the DEN.</li> </ol>				
<p><b>Energy – Lean</b></p>				
<p>The applicant has proposed an improvement of beyond Building Regulations by 18.2% through improved energy efficiency standards in the residential element and 17% improvement for the commercial element. This goes beyond the minimum 10% and</p>				

Stakeholder	Comment	Response
	<p>15% reduction respectively set in Policy SI2 in the Intended to Publish London Plan, so this is supported. Some clarifications are requested below.</p> <p><b>Energy – Clean</b></p> <p>The Be Clean strategy to connect to the DEN in Wood Green is generally acceptable. Some evidence should be provided that the DEN system was inputted into the SAP model and that the plant room is adequately sized for a substation.</p> <p>The applicant will need to demonstrate that they will provide the following details prior to the commencement of construction:</p> <ul style="list-style-type: none"> <li>a) Buried pipe (dry and filled with nitrogen) to our specification from the GF plant room to a manhole at the boundary of their site and evidence of any obstructions in highway adjacent to connection point;</li> <li>b) A good quality network within the building – 60/40 F&amp;R, &lt;50W/dwelling losses from the network – ideally to an agreed standard in the S106;</li> <li>c) A clear plan for QA of the network post-design approval through to operation, based on CP1;</li> <li>d) A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set.</li> </ul> <p>Separate from planning, LBH would be interested to talk to them about adopting the heat network in their building and supplying heat to residents (which would help compliance with point d) above.</p> <p><b>Energy – Green</b></p> <p>The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) are the most viable for the commercial units and solar photovoltaic (PV) panels will deliver the Be Green requirement for the residential units. A total 7.24 tCO2 of emissions are proposed to be</p>	

Stakeholder	Comment	Response
	<p>reduced under Be Green measures. This represents a 6.95% reduction from the baseline for the residential and 22% reduction for the commercial elements.</p> <p>The solar array is proposed to be made up of 86 PV panels at a 30° angle facing SW/SE, with an efficiency of at least 20%. The peak output would be 28 kWp, which is estimated to produce around 23,005 kWh of renewable electricity per year. This equates to a yearly saving of 5.36 tCO<sub>2</sub>. The carbon savings from ASHPs are 2.8tCO<sub>2</sub>/year, with a Coefficient of Performance (COP) of 3.4.</p> <p><u>Energy Strategy Actions:</u></p> <ul style="list-style-type: none"> <li>- Report the unregulated energy demand.</li> <li>- Ensure all tables state the units for energy and emission figures.</li> <li>- Use SAP2012 carbon factors instead of SAP10.</li> <li>- Calculate Scenario 2 (communal gas boilers) for the deferred carbon offset payment.</li> <li>- Confirm that sub-metering will be installed for all dwellings and units.</li> <li>- Detail how thermal bridging factors of 0.08 will be achieved on site.</li> <li>- Provide details of the 97% efficient boiler [input 367a], this seems high. This should be gross efficiency which will be slightly worse.</li> <li>- Improving residential lighting energy demand by introducing daylight control and occupancy sensing for communal areas.</li> <li>- Confirm the DEN system has been inputted to SAP.</li> <li>- Confirm there is space for a DEN substation in the ground floor plant room and demonstrate this on a plan.</li> <li>- The BRUKL sheet does not specify any renewable energy generated for the commercial elements of the scheme, however, the Energy Strategy states that there will be a 1.88tCO<sub>2</sub> (22%) saving under Be Green. Please clarify/rectify.</li> <li>- Provide a roof plan setting the solar array layout.</li> </ul> <p><b>Overheating</b></p>	

Stakeholder	Comment	Response												
	<p>The overheating modelling has been undertaken for all rooms and in line with CIBSE TM59 with TM49 weather files: DSY1-3 for 2020s weather pattern and the 2050s and 2080s future weather patterns. A number of clarifications are requested.</p> <p><u>Action:</u></p> <ul style="list-style-type: none"> <li>- Has the overheating model included the estimated heat losses from the communal heating pipework? The questions below have not been answered:</li> </ul> <table border="1" data-bbox="415 511 1558 657"> <tr> <td data-bbox="415 511 682 544">Heating system</td> <td data-bbox="682 511 1375 544">Is communal heating present?</td> <td data-bbox="1375 511 1558 544">Yes</td> </tr> <tr> <td></td> <td data-bbox="682 544 1375 576">What is the flow/return temperature?</td> <td data-bbox="1375 544 1558 576"></td> </tr> <tr> <td></td> <td data-bbox="682 576 1375 609">Have horizontal pipe runs been minimised?</td> <td data-bbox="1375 576 1558 609"></td> </tr> <tr> <td></td> <td data-bbox="682 609 1375 657">Do the specifications include insulation levels in line with the London Heat Network Manual<sup>31</sup></td> <td data-bbox="1375 609 1558 657"></td> </tr> </table> <ul style="list-style-type: none"> <li>- What occupancy and equipment heat gains have been assumed for the model?</li> <li>- Have internal blinds been modelled for all design years? Can the applicant please submit a baseline without the blinds? Will the blinds be fixed within the windows?</li> <li>- Please confirm the floor to ceiling height.</li> <li>- Whether the development is relying on natural ventilation, and if so, which rooms will be subject to air pollution or noise impacts in which occupants may not want to open their windows?</li> <li>- Confirm that the proposed MVHR system has a summer by-pass function.</li> </ul> <p>The results for DSY2 and 3 (2020s), and 2050s and 2080s show a significant number of the rooms risk overheating under Criteria 2. It is acknowledged that overheating occurs mostly between 22:00 and 00:00, which is linked to thermal mass taking some time lose its heat through purge ventilation.</p> <p><b>Sustainability Assessment</b></p> <p>Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The Sustainability</p>	Heating system	Is communal heating present?	Yes		What is the flow/return temperature?			Have horizontal pipe runs been minimised?			Do the specifications include insulation levels in line with the London Heat Network Manual <sup>31</sup>		
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Stakeholder	Comment	Response
	<p>section in the report sets out the proposed measures to improve the sustainability of the scheme.</p> <p>The applicant has also prepared a BREEAM Pre-Assessment Report for the commercial units. Multiple assessments will be undertaken if multiple uses are delivered for the commercial areas. Based on this report, a score of 57.92% is expected to be achieved, equivalent to 'Very Good' rating. A potential score of 59.52% could be achieved. Targeting such a low score will risk not achieving 'Very Good' as a very minimum, and does not demonstrate the ambition to deliver a more sustainable development.</p> <p><u>Sustainability actions:</u></p> <ul style="list-style-type: none"> <li>- Under drought, the applicant has not set out how it will reduce the use of fresh water and utilise opportunities for rainwater harvesting and usage within the development. The SUDS should not be discharging into the Thames Water sewage if possible.</li> <li>- The pre-application response requested the application to set out how it will reduce its embodied energy, no evidence has been provided about this.</li> <li>- Confirmation that the amenity roof and podium slabs have allowed for a planted substrate depth of at least 250mm to allow landscaping to grow adequately.</li> <li>- Areas where we feel the BREEAM score could be improved have been outlined below: <ul style="list-style-type: none"> <li>o Man04 is essential in ensuring the development is of high quality, delivers the benefits that are secured at application stage and reduces maintenance and energy costs for tenants. This should form a key part of the BREEAM assessment.</li> <li>o In relation to TRA02, where will cycling facilities be provided (i.e. changing facilities, showers, lockers, drying areas)?</li> <li>o Why is Mat01 not targeted?</li> <li>o Under Wst01, the development can be more ambitious to limit construction waste.</li> <li>o Under Wst02, why are recycled aggregates not specified? This can be targeted.</li> </ul> </li> </ul>	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> <li>○ Full credits for LE04 can also be achieved by targeting a net gain of ecological value on the site.</li> <li>○ Again, the development should be more ambitious and should target to achieve LE05 to ensure that the proposed ecological benefits can be secured for the longer term.</li> </ul> <p>- Please also ensure the BREEAM Pre-Assessment Credit Summary is in the right order, it is currently confusing to follow.</p> <p><b>Carbon Management Comments 18/06/2020</b></p> <p>The applicant submitted further information on 07/06/2020, in response to the comments above: '200604 Energy Comment Response', Caxton Overheating Assessment V02 (dated 9 March 2020), Caxton Overheating Addendum, BREEAM Pre-Assessment Report V02 (dated 4 June 2020).</p> <p>A few further observations:</p> <ul style="list-style-type: none"> <li>- The carbon reductions based on the DEN and gas boiler scenario have different baselines. These must be revised and resubmitted as part of a planning condition to calculate the carbon offset payment (based on the gas boiler scenario) that will be due upon commencement.</li> <li>- Based on the revised BREEAM Pre-Assessment report, a score of 58.62% is expected to be achieved, equivalent to 'Very Good' rating. A potential score of 60.22% could be achieved.</li> </ul> <p>Based on the submitted responses and additional/amended information, the application can be supported in carbon management terms subject to the following planning conditions.</p> <p><u>Energy Plan</u></p> <p>(a) Prior to the commencement of development, an updated Energy Assessment should be submitted to the Local Planning Authority for approval. This should demonstrate that</p>	

Stakeholder	Comment	Response
	<p>the development will connect to the Decentralised Energy Network at Wood Green and provide the calculated deferred carbon offset contribution approach. A minimum carbon dioxide saving of 47.9% should be achieved against a Building Regulations 2013 Part L scheme for the domestic element and a 39% saving for the non-domestic element, in line with the fabric efficiencies set out in the Energy Strategy prepared by JAW Sustainability (dated 24 April 2020).</p> <p>(b) Prior to the commencement of construction, the following details must be submitted to demonstrate the scheme has made sufficient provisions to connect to the Wood Green Decentralised Energy Network:</p> <ul style="list-style-type: none"> <li>• Set out detailed design of the heat network and how this complies with CIBSE CoP1 and the LBH Generic Specification. This should include detail of pipe routes and lengths, pipe sizes (taking account of F&amp;R temperatures and diversification) and insulation to determine heat loss from the pipes in W/dwelling in order to demonstrate losses have been minimised;</li> <li>• Buried pipe (dry and filled with nitrogen) to LBH's approved specification from the ground floor plant room to a manhole at the boundary of their site and evidence of any obstructions in highway adjacent to connection point;</li> <li>• A clear plan for Quality Assurance of the network post-design approval through to operation, based on CP1;</li> <li>• A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set;</li> <li>• Determine how the offsets will be split between 'initial offset' (100% of which to be paid on commencement) and 'deferred offset'.</li> </ul> <p>(c) Within 6 months of completion, a final Energy Assessment must be submitted to the Local Planning Authority to demonstrate achieved carbon emission savings on site and calculate the carbon offset contribution, if required.</p> <p>(d) Two months prior to the first occupation of the development, confirmation shall be submitted of the maximum possible solar photovoltaic (PV) energy to be generated on the roof. The submission shall include: a roof plan; the number, angle, orientation, type,</p>	

Stakeholder	Comment	Response
	<p>and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp) and the final carbon reduction at the Be Green stage of the energy hierarchy. The proposed 28 kWp solar array should aim to generate at least 23,005 kWh of renewable electricity per year.</p> <p>The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained and cleaned at least annually thereafter.</p> <p>Reason: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2016 Policy 5.2, draft New London Plan (Intend to Publish) Policy SI2 and Local Plan Policy SP4.</p> <p><u>Overheating</u></p> <p>(a) Prior to occupation of the development, a revised Overheating Report for future weather files (2050s and 2080s) shall be submitted to and approved by the Local Planning Authority. This will be based on thermal dynamic modelling in line with CIBSE TM59, with TM49 weather files. This should include:</p> <ul style="list-style-type: none"> <li>- A retrofit plan setting out how future overheating risk will be mitigated, confirming these measures can be incorporated into the design of the development, prioritising passive design measures.</li> <li>- A statement who will manage and own the overheating risk going forward. They should be named report so that if residents have an issue, they can be signposted to the responsible / liable party.</li> <li>- A copy of the home guide that sets out measures to mitigate any overheating, providing guidance on how to use the MVHR, how night-time heat purging works in combination with thermal mass, etc.</li> </ul> <p>(b) Prior to occupation of the development, overheating measures must be installed to reduce the risk of overheating in habitable rooms in line with the Caxton Road Overheating Assessment V02 prepared by JAW Sustainability (dated 9th March 2020):</p> <ul style="list-style-type: none"> <li>- Internal blinds with a shading coefficient of 0.5 or better;</li> </ul>	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> <li>- Glazing g-value of 0.40;</li> <li>- Window openings of 45 degrees or better;</li> <li>- MVHR with a summer bypass function.</li> </ul> <p>Reason: To enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with Policy 5.9 of the London Plan, Draft Policy SI4 of the draft New London Plan, and Policies SP4 and DM21 of the Local Plan.</p> <p><u>MVHR</u></p> <p>Prior to installation, details of the Mechanical Ventilation and Heat Recovery (MVHR) system shall be submitted to the Local Planning Authority. Details should include the efficiency, location of the units to ensure easy access for servicing, plans showing the rigid ducting.</p> <p>Reason: To ensure the new homes are adequately ventilated as required by London Plan Policy 5.9.</p> <p><u>Living Roofs</u></p> <p>(a) No development shall commence above ground floor until details of Living Roofs and photovoltaic array have been submitted to and approved in writing by the Local Planning Authority. These details shall include:</p> <ul style="list-style-type: none"> <li>i) A roof plan identifying where the living roofs and solar panels will be located and what surface area they will cover;</li> <li>ii) Sections demonstrating substrate of no less than 120mm for extensive living roofs, and no less than 250mm for intensive living roofs;</li> <li>ii) Plans showing details on the diversity of substrate depths and types across the roof to provide contours of substrate, such as substrate mounds in areas with the greatest structural support to provide a variation in habitat;</li> </ul>	

Stakeholder	Comment	Response
	<p>iv) Details of the location of log piles / flat stones for invertebrates;  v) Details on the range of native species of wildflowers and herbs planted to benefit native wildlife. The living roof will not rely on one species of plant life such as Sedum (which are not native);  vi) Relationship with photovoltaic array;  vii) Irrigation, management and maintenance arrangements.</p> <p>(b) The approved Living Roofs and photovoltaic array shall be provided before 90% of the dwellings are first occupied and shall be managed thereafter in accordance with the approved management arrangements.</p> <p>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with regional policies 5.3, 5.9 and 5.11 of the London Plan (2016) and Policy SP4, SP5, SP11 and SP13 of the Haringey Local Plan (2017).</p> <p><u>BREEAM Accreditation</u></p> <p>(a) Prior to commencement on site, a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM 'Very Good' outcome (or equivalent) with a minimum score of 58.6%.</p> <p>(b) None of the flexible commercial/retail units shall be occupied for retail use (Use Class A1-A5) or business use (Use Class B1 or B8) until a final Certificate has been issued certifying that a BREEAM (or any such equivalent national measure of sustainable building which replaces that scheme) rating of 'Very Good' for that unit has been achieved. The Accreditation of 'Very Good' shall be maintained thereafter unless otherwise agreed in writing with the Local Planning Authority.</p> <p>Reason: To ensure sustainable development in accordance with London Plan 2016 Polices 5.1, 5.2, 5.3 and 5.9 and Local Plan Policy SP4.</p>	

Stakeholder	Comment	Response
<p>Carbon Management Team (Pollution)</p>	<p>Re: Planning Application HGY/2020/0795 at Former Petrol Filling Station 76 Mayes Road N22</p> <p>Thanks for contacting the Carbon Management Team (Pollution) regarding the above planning application for the redevelopment of the site to provide a single building of between 4 and 9 storeys in height, comprising 75 residential units (C3) and 953 sqm of flexible commercial floorspace (Use Classes A1-A5, B1 and B8), with associated cycle parking, plant, refuse and recycling provision, landscaping and all necessary ancillary and enabling works and I will like to comment as follows.</p> <p>Having considered all the submitted supportive information i.e. Design and Access Statement dated March 2020, Planning Statement dated March 2020, Energy Statement Report dated 10th March 2020 taken note of the applicant recommendation for the use of Air Source Heat Pumps or Solar Panels, Air Quality Assessment with reference 194760-04 prepared by Ardent Consulting Engineers dated 16th March 2020 taken note of medium dust emission during construction work, proposed heating centralised boilers, section 8 (Mitigation Measures), 8.10 (Provision of Mechanical Ventilations) and 9 (Summary &amp; Conclusions) and the Desk study/Preliminary Risk Assessment Report with reference P2254J1730/AMM prepared by JOMAS Ltd dated 17th July 2019 taken note of section 6 (Qualitative Risk Assessment), Tables 6.1 (Potential Sources, Pathways and Receptors) and 6.3 (Preliminary Risk Assessment for the site), <b>please be advised that we have no objection to the proposed development in relation to AQ and Land Contamination but the following planning conditions and informative are recommend should planning permission be granted.</b></p> <p>1. <u>Land Contamination</u></p> <p>Before development commences other than for investigative work:</p> <p>a. Using the information already actual from the submitted desk study/preliminary risk assessment, a diagrammatical representation (Conceptual Model) for the site</p>	<p>Noted.</p> <p>The recommended conditions will be included with any grant of planning permission.</p>

Stakeholder	Comment	Response
	<p>of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority.</p> <p>b. If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.</p> <p>c. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.</p> <p>d. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.</p> <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>2. <u>Unexpected Contamination</u></p> <p>If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this</p>	

Stakeholder	Comment	Response
	<p>contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <p>Reason: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.</p> <p>3. <u>NRMM</u></p> <p>a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <a href="http://nrmm.london/">http://nrmm.london/</a>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.</p> <p>b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ</p> <p>4. <u>Combustion and Energy Plant</u></p>	

Stakeholder	Comment	Response
	<p>Prior to installation considering the applicant proposal for the use of a centralised boilers as an energy source, details of the gas boilers to be provided for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh (0%).</p> <p>Reason: As required by The London Plan Policy 7.14.</p> <p>5. <u>Demolition/Construction Environmental Management Plans</u></p> <p>a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst</p> <p>b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.</p> <p>The following applies to both Parts a and b above:</p> <p>a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).</p> <p>b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:</p> <p>i. A construction method statement which identifies the stages and details how works will be undertaken;</p> <p>ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;</p> <p>iii. Details of plant and machinery to be used during demolition/construction works;</p>	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> <li>iv. Details of an Unexploded Ordnance Survey;</li> <li>v. Details of the waste management strategy;</li> <li>vi. Details of community engagement arrangements;</li> <li>vii. Details of any acoustic hoarding;</li> <li>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</li> <li>ix. Details of external lighting; and,</li> <li>x. Details of any other standard environmental management and control measures to be implemented.</li> </ul> <p>c) The CLP will be in accordance with Transport for London’s Construction Logistics Plan Guidance (July 2017) and shall provide details on:</p> <ul style="list-style-type: none"> <li>i. Monitoring and joint working arrangements, where appropriate;</li> <li>ii. Site access and car parking arrangements;</li> <li>iii. Delivery booking systems;</li> <li>iv. Agreed routes to/from the Plot;</li> <li>v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and</li> <li>vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and</li> <li>vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.</li> </ul> <p>d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:</p> <ul style="list-style-type: none"> <li>i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;</li> <li>ii. Details confirming the Plot has been registered at <a href="http://nrmm.london">http://nrmm.london</a>;</li> </ul>	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> <li>iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;</li> <li>iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);</li> <li>v. A Dust Risk Assessment for the works; and</li> <li>vi. Lorry Parking, in joint arrangement where appropriate.</li> </ul> <p>The development shall be carried out in accordance with the approved details as well as on the applicant submitted Air Quality Mitigation Measures in the Air Quality Report.</p> <p>Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.</p> <p>Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.</p>	
Environmental Health - Noise	<p><b>Commentary</b></p> <p>I have reviewed the information provided in respect of the above and particularly the Noise Assessment (Reference No 194760-02).</p> <p><b>Construction Phase</b></p> <p>We approve the control measures for noise proposed in Section 6.20 to 6.25. We would require the developer to conduct noise monitoring throughout the construction project in accordance with BS 5228 - 1 to ensure they remain within the Construction Noise Limits specified in section 4.4 of the report. We would seek to formalise this via provision of a Noise and Vibration Management Plan.</p> <p><b>Commercial Noise</b></p>	<p>Noted.</p> <p>The recommended conditions will be included with any grant of planning permission.</p>

Stakeholder	Comment	Response
	<p>We accept the provision of a cumulative rating level limit for noise impacts on the closest residential receptors in the absence of actual rating levels. We expect that this can be addressed by the conditional requirement that “any and all fixed plant and equipment associated with the development should not exceed 10dBA below the measured background sound level”.</p> <p>We expect the applicant to undertake an appropriate detailed assessment once the specification of noise-generating plant has been confirmed.</p> <p><b>Shopping Centre Plant Noise</b></p> <p>We accept the methodology use for this assessment and the rationale for the 5dBa reduction implemented.</p> <p><b>Noise Nuisance</b></p> <p>We will require the applicant to meet and comply with BS 8233:2014 and confirm the scheme of sound insulation for the proposed residential development prior to commencement of the development. Further verification testing should be required post completion and prior to occupation of the development for residential properties adjacent to the commercial units.</p> <p>The applicant will also need to ensure that any kitchen ventilation extractions do not adversely impact on future residents (from noise or odour) and they will need to ensure that the terminal point of any ducting is located to prevent odour nuisance.</p> <p>As specific details regarding potential future commercial tenants’ operations are unconfirmed at this stage, we recommend that the applicant consider the inclusion of the following clause in any future tenancy agreement for the commercial units - <i>‘Noise levels generated by commercial activity should not exceed NR 15dB Lmax in any adjoining residential property.’</i></p>	

Stakeholder	Comment	Response												
	<p><b>Conclusion</b></p> <p>There are no objections made in principle to this proposed development, but the following conditions are recommended for inclusion in any permission granted:</p> <p><b>Condition: Internal Noise Levels within Residential Units (in accordance with BS8233:2014)</b></p> <table border="1" data-bbox="302 522 1499 748"> <thead> <tr> <th data-bbox="302 522 701 560">Time</th> <th data-bbox="701 522 1073 560">Area</th> <th data-bbox="1073 522 1499 560">Maximum Noise level</th> </tr> </thead> <tbody> <tr> <td data-bbox="302 560 701 634">Daytime Noise 7am – 11pm</td> <td data-bbox="701 560 1073 634">Living rooms and Bedrooms</td> <td data-bbox="1073 560 1499 634">35dB(A)</td> </tr> <tr> <td data-bbox="302 634 701 672"></td> <td data-bbox="701 634 1073 672">Dining Room/Area</td> <td data-bbox="1073 634 1499 672">40dB(A)</td> </tr> <tr> <td data-bbox="302 672 701 748">Night Time Noise 11pm - 7am</td> <td data-bbox="701 672 1073 748">Bedrooms</td> <td data-bbox="1073 672 1499 748">30dB(A)</td> </tr> </tbody> </table> <p>With no individual noise events to exceed 45dB LAmax (measured with F time weighting) in bedrooms with windows closed between 23.00hrs - 07.00hrs.</p> <p><b>Condition: Sound Insulation between Residential and Commercial Properties.</b> Sound insulation between the commercial premises on the ground floor and residential units be provided and installed in the premises in accordance with a scheme submitted to and approved by the Local Planning Authority before the commencement of any building works.</p> <p>The applicant shall submit respective schemes of Sound Insulation (glazing and separating floor) to the Local Planning Authority for approval before the commencement of any building works.</p> <p><b>Condition: Plant Noise Design Criteria</b> Noise arising from the use of any plant and associated equipment shall not exceed the existing background noise level (LA90 15mins) when measured at 1 metre external (LAeq 15mins) from the nearest residential or noise sensitive premises.</p>	Time	Area	Maximum Noise level	Daytime Noise 7am – 11pm	Living rooms and Bedrooms	35dB(A)		Dining Room/Area	40dB(A)	Night Time Noise 11pm - 7am	Bedrooms	30dB(A)	
Time	Area	Maximum Noise level												
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Stakeholder	Comment	Response
	<p><b>Condition: Plant Noise Design Criteria (commercial)</b> Any extract ventilation equipment shall be installed, together with any associated ducting, so as to prevent the transmission of noise and vibration into any neighbouring premises.</p> <p>The noise level from any plant together with any associated ducting, shall be 10 dB(A) or greater below the measured background noise level at 1 metre from the façade of the nearest noise sensitive premises. The method of assessment should be carried in accordance with BS4142:2014 'Rating industrial noise affecting mixed residential and industrial areas'.</p> <p>Should the predicted levels exceed those specified in this condition, a scheme of insulation works to mitigate the noise shall be submitted to and approved by the local planning authority for consideration.</p> <p><b>Condition: Odour control equipment (commercial)</b> Details of fume extraction and odour control equipment, including any external ducting and flues shall be submitted to and approved in writing by the Local Planning Authority. Such equipment shall be installed in its entirety before the use hereby permitted is commenced. The equipment shall thereafter be maintained in accordance with the manufacturer's instructions and an approved Plant Management Plan which will detail arrangements for servicing, operation, and cleansing.</p> <p><b>Condition: Servicing and deliveries</b> Servicing and deliveries shall be undertaken in accordance with the Delivery and Servicing Plan which shall be submitted in writing and agreed by the Local Planning Authority prior to the occupation of the development.</p>	
Waste management	Subsequent to receipt of further information from the applicant, confirmed that it was sufficient to turn rag status to green.	Noted.

Stakeholder	Comment	Response
Drainage	<p>Redevelopment of the site to provide a single building of between 4 and 9 storeys in height, comprising 75 residential units (C3) and 953 sqm of flexible commercial floorspace (use classes A1-A5, B1 and B8), with associated cycle parking, plant, and recycling provision, landscaping and all necessary ancillary and enabling works.</p> <p>We met with the drainage consultant last September, to discuss their proposal for the above proposed development, and at the time we were satisfied to accept the strategy in principal subject to further details being provided. Please see the comments below.</p> <p>We have now reviewed the drainage strategy for the proposed development, due to the limited space available there are few opportunities to have SuDS solutions towards the top of the hierarchy.</p> <p>The chosen SuDS, are Green roofs, permeable paving, attenuation tank &amp; pumping station to manage the surface water before being discharged to the Thames Water, network subject to approval from Thames Water.</p> <p>Due to the existing site potentially being contaminated SuDS, infiltration techniques will not be permitted on this site.</p> <p>A management maintenance schedule has been provided for each SuDS, element, details of a backup system should be made available for the pumping station should the system fail. The management maintenance must be in place for the lifetime of the development.</p> <p>Based on the information provided the LLFA, can accept the drainage strategy for this proposed development, and now request a plan showing the overland flow path and final detailed drainage drawings.</p>	<p>Noted.</p> <p>The recommended conditions will be included with any grant of planning permission.</p>
<b>EXTERNAL</b>		
Environment Agency	Thank you for consulting us on the above planning application.	Noted.

Stakeholder	Comment	Response
	<p>The previous use of the proposed development site as a petrol filling station presents a high risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is within source protection zone 1 for public water drinking supply.</p> <p>We have reviewed the information submitted and believe the proposed development will be acceptable subject to the following <b>6 planning conditions</b> being included on any planning permission granted. Without these conditions we would object to the proposal due its adverse impact on the environment.</p> <p><b>EA Condition 1</b>  No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:</p> <ol style="list-style-type: none"> <li>1. A preliminary risk assessment which has identified: <ul style="list-style-type: none"> <li><input type="checkbox"/> all previous uses</li> <li><input type="checkbox"/> potential contaminants associated with those uses</li> <li><input type="checkbox"/> a conceptual model of the site indicating sources, pathways and receptors</li> <li><input type="checkbox"/> potentially unacceptable risks arising from contamination at the site</li> </ul> </li> <li>2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.</li> <li>3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.</li> </ol>	<p>The recommended conditions and informatives will be included with any grant of planning permission.</p>

Stakeholder	Comment	Response
	<p>4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.</p> <p>Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.</p> <p><b>Reason(s)</b> To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework.</p> <p>NB: The submitted phase 1 report is considered sufficient to address part (1) of this condition, however further information is required to address the remaining parts 2-4.</p> <p><b>EA Condition 2</b> Prior to any part of the permitted development being occupied, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.</p> <p><b>Reason(s)</b> To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 170 of the National Planning Policy Framework.</p> <p><b>EA Condition 3</b></p>	

Stakeholder	Comment	Response
	<p>The development hereby permitted shall not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the local planning authority, has been submitted to, and approved in writing by, the local planning authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the local planning authority.</p> <p><b>Reason(s)</b> To ensure that the site does not pose any further risk to human health or the water environment by managing any ongoing contamination issues and completing all necessary long-term remediation measures. This is in line with paragraph 170 of the National Planning Policy Framework.</p> <p>NB: The requirements of this condition need to be considered along with the potential for construction activities to mobilise contamination as well as any monitoring required as part of any remedial strategy.</p> <p><b>EA Condition 4</b> If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.</p> <p><b>Reason(s)</b> To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.</p> <p><b>EA Condition 5</b></p>	

Stakeholder	Comment	Response
	<p>Piling, deep foundations or other intrusive groundworks (investigation boreholes/tunnel shafts/ground source heating and cooling systems) using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.</p> <p><b>Reason(s)</b> To ensure that the proposed Piling, deep foundations or other intrusive groundworks (investigation boreholes/tunnel shafts/ground source heating and cooling systems) does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework.</p> <p>NB: Prior to any piling or other intrusive groundworks commencing it must be demonstrated that deterioration of controlled waters will not occur. This is likely to require the following aspects:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Pile design, particularly toe depth in relation to underlying aquifers.</li> <li><input type="checkbox"/> Where piles penetrate into the saturated zone (particularly within an SPZ1) monitoring of controlled waters receptors along with strategy to mitigate any observed impact are likely to be required.</li> </ul> <p><b>EA Condition 6</b> A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of any part of the permitted development.</p> <p><b>Reason(s)</b> To ensure that a sufficient monitoring network is maintained to allow for the completion any monitoring required as part of a verification plan, to demonstrate “betterment” or that no deterioration has occurred. Also, to ensure that redundant boreholes are safe</p>	

Stakeholder	Comment	Response
	<p>and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 170 of the National Planning Policy Framework.</p> <p><b>Additional Information</b>  The site is underlain by a significant thickness of London Clay which is likely to provided protection to the deeper aquifer from which potable water supplies are drawn. While superficial deposits are not mapped at the site, information within the submitted report suggests that perched groundwater (potentially contaminated) is present. In addition, there is uncertainty around remaining underground storage tanks and the installation of aspects of the ground source heat pump system which have the potential to penetrate the London Clay.</p> <p>We are in agreement with the recommendations made within the submitted contamination report to ensure that these gaps in the conceptual site model are addressed. Consideration also needs to be given to aspects of the development which might create preferential pathways into the deeper aquifer, such as investigation boreholes for geotechnical purposes etc and piled foundations.</p> <p>Having reviewed the drainage strategy, it is understood that all surface water will be disposed of too mains sewers. <b>Should there be any changes to this drainage proposal we need to be re-consulted.</b></p> <p><b>Advice to Applicant</b>  We recommend that developers should:</p> <ol style="list-style-type: none"> <li>1. Follow the risk management framework provided in LC:RM, Land Contamination: Risk Management when dealing with land affected by contamination.</li> <li>2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.</li> </ol>	

Stakeholder	Comment	Response
	<p>3. Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed.</p> <p>4. Refer to the contaminated land pages on GOV.UK for more information.</p> <p>We expect the site investigations to be carried out in accordance with best practice guidance for site investigations on land affected by land contamination. E.g. British Standards when investigating potentially contaminated sites and groundwater, and references with these documents:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> BS5930:2015 Code of practice for site investigations;</li> <li><input type="checkbox"/> BS 10175:2011+A1:2013 Code of practice for investigation of potentially contaminated sites;</li> <li><input type="checkbox"/> BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points;</li> <li><input type="checkbox"/> BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns and groundwater quality.)</li> <li><input type="checkbox"/> Use MCERTS accredited methods for testing contaminated soils at the site.</li> </ul> <p>A Detailed Quantitative Risk Assessment (DQRA) for controlled waters using the results of the site investigations with consideration of the hydrogeology of the site and the degree of any existing groundwater and surface water pollution should be carried out. This increased provision of information by the applicant reflects the potentially greater risk to the water environment. The DQRA report should be prepared by a “Competent person” E.g. a suitably qualified hydrogeologist. In the absence of any applicable on-site data, a range of values should be used to calculate the sensitivity of the input parameter on the outcome of the risk assessment.</p> <p>Further guidance on the setting of compliance points for DQRAs can be found here (<a href="https://www.gov.uk/guidance/land-contamination-groundwater-compliance-points-quantitative-risk-assessments">https://www.gov.uk/guidance/land-contamination-groundwater-compliance-points-quantitative-risk-assessments</a>).</p>	

Stakeholder	Comment	Response
	<p>Where groundwater has been impacted by contamination on site, the default compliance point for both Principal and Secondary aquifers is 50m.</p> <p>Where leaching tests are used it is strongly recommended that BS ISO 18772:2008 is followed as a logical process to aid the selection and justification of appropriate tests based on a conceptual understanding of soil and contaminant properties, likely and worst-case exposure conditions, leaching mechanisms, and study objectives. During risk assessment one should characterise the leaching behaviour of contaminated soils using an appropriate suite of tests. As a minimum these tests should be:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> upflow percolation column test, run to LS 2 – to derive kappa values;</li> <li><input type="checkbox"/> pH dependence test if pH shifts are realistically predicted with regard to soil properties and exposure scenario; and</li> <li><input type="checkbox"/> LS 2 batch test – to benchmark results of a simple compliance test against the final step of the column test.</li> </ul> <p>Following the DQRA, a Remediation Options Appraisal to determine the Remediation Strategy in accordance with CRL11.</p> <p>The verification plan should include proposals for a groundwater-monitoring programme to encompass regular monitoring for a period before, during and after ground works. (E.g. monthly monitoring before, during and for at least the first quarter after completion of ground works, and then quarterly for the remaining 9-month period.)</p> <p>Where SUDs are proposed; infiltration SUDs should not be located in unsuitable and unstable ground conditions such as land affected by contamination or solution features. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of groundwater. For the immediate drainage catchment areas used for handling and storage of chemicals and fuel, handling and storage of waste and lorry, bus and coach parking or turning areas, infiltration SuDS are not permitted without an environmental permit. Further advice is available in the updated CIRIA SUDs manual <a href="http://www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx">http://www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx</a></p>	

Stakeholder	Comment	Response
	<p><b>Final Comments</b> Thank you again for consulting us on this application. If you have any queries please don't hesitate to contact me on the details below.</p>	
Thames Water	<p><b>Waste Comments</b> Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices">https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices</a></p> <p>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. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes</a>.</p> <p>The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and 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.</p>	<p>Noted.</p> <p>The recommended conditions and informatives will be included with any grant of planning permission.</p>

Stakeholder	Comment	Response
	<p data-bbox="300 235 1312 302"><a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes</a>.</p> <p data-bbox="300 310 1545 451">Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p data-bbox="300 492 552 521">Water Comments</p> <p data-bbox="300 529 1520 777">On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p> <p data-bbox="300 818 1535 1289">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.</p> <p data-bbox="300 1297 1312 1364"><a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes</a>.</p>	

Stakeholder	Comment	Response
	<p>Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk</p> <p>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.</p> <p>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. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes</a>.</p> <p>Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk</p>	
Transport for London	<p>Re: HGY/2020/0795; Former Petrol Filling Station 76 Mayes Road London N22</p> <p>Redevelopment of the site to provide a single building of between 4 and 9 storeys in height, comprising 75 residential units (C3) and 953 sqm of flexible commercial floorspace (Use Classes A1-A5, B1 and B8), with associated cycle parking, plant, refuse and recycling provision, landscaping and all necessary ancillary and enabling works.</p> <p>With regards to the above mentioned site, TfL offers the following comments:</p>	<p>Noted.</p> <p>The recommended conditions and s106 obligations will be included with any grant of planning permission.</p>

Stakeholder	Comment	Response
	<ol style="list-style-type: none"> <li data-bbox="348 237 1503 375">1. The site is situated on a location with PTAL 5, which is of very good public transport accessibility; TfL also supports that the site would be 'car free', and therefore legal restrictions shall be place to prevent future residents' from local car parking permits.</li> <li data-bbox="348 415 1535 708">2. TfL supports that the proposed level of cycle parking provision, which meets the intend to publish London Plan cycle parking standards. The council shall ensure that all cycle parking facilities and access shall be designed in line with the London Cycle Design Standards (LCDS), including the provision of at least 5 % wider bike space; it should be noted that the currently submitted plan does not indicate this clearly, this should be clarified. Shower and changing facilities shall also be included for the commercial spaces. All these should be secured by planning condition.</li> <li data-bbox="348 748 1528 854">3. A residential and workplace travel plan should be secured by s106 agreement to encourage the uptake of sustainable travel modes, in particular walking and cycling.</li> <li data-bbox="348 894 1476 1000">4. A delivery &amp; servicing plan (DSP) should be secured by condition to regulate servicing activities for both the residential and commercial land use of the proposal.</li> <li data-bbox="348 1040 1457 1146">5. TfL encourages that Haringey Council to secure appropriate public realm, walking and cycle improvements from the proposal as well as all necessary highway work by legal agreement.</li> <li data-bbox="348 1203 1535 1390">6. A construction management plan and logistics plan shall be produced in line with TfL's latest CLP guidance, which ensure safety of road users as well as vulnerable users such as cyclists and pedestrians. It shall also commit that the applicant to employ suppliers/ contractors whom have achieved 'Silver' level membership of the Fleet Operator Recongition Schemes (FORS).</li> </ol>	

Stakeholder	Comment	Response
	<p>Subject to the above conditions being met, the proposal as it stands would not result in an unacceptable impact to the SRN (A106 High Road) located in the vicinity of the site.</p>	
<p>Metropolitan Police - Designing Out Crime</p>	<p>Proposal: Redevelopment of the site to provide a single building of between 4 and 9 storeys in height, comprising 75 residential units (C3) and 953 sqm of flexible commercial floorspace (Use Classes A1-A5, B1 and B8), with associated cycle parking, plant, refuse and recycling provision, landscaping and all necessary ancillary and enabling works.</p> <p><u>Section 1 - Introduction:</u></p> <p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference the above application we have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>I can confirm we have held a video meeting with the project Architects to discuss Crime Prevention and Secured by Design (SbD). The design team have supplied a DAS response for Planning in regard to the basic of SbD requirements which is acceptable for a stage 2 application.</p>	<p>Noted.</p> <p>The recommended conditions will be included with any grant of planning permission.</p>

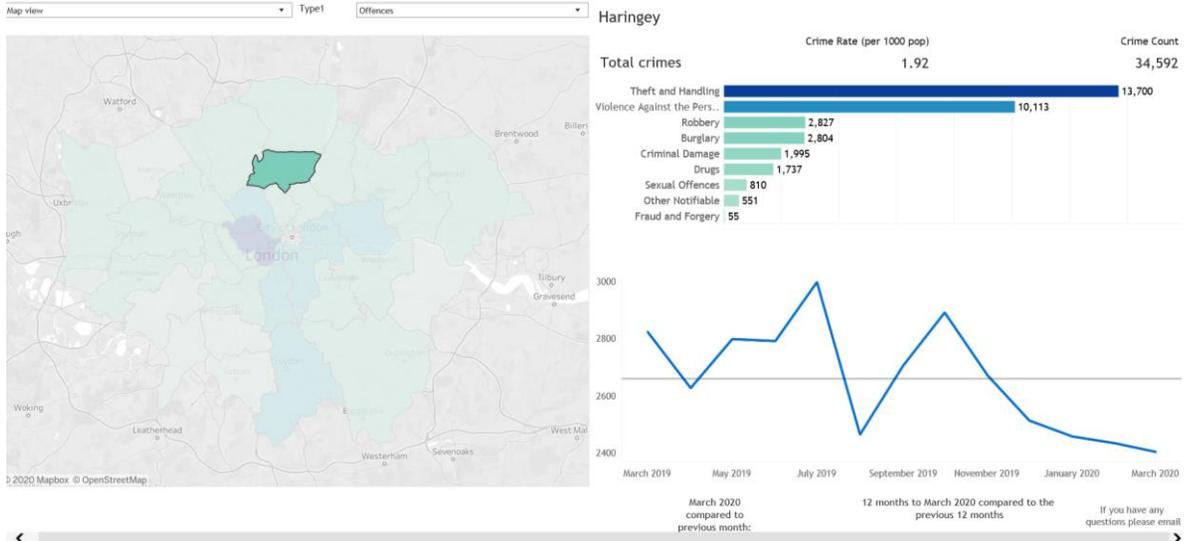
Stakeholder	Comment	Response
	<p>We discussed the perimeter treatments, external envelope, external lighting, façade curtain walling, access control, but have not completed the internal compartmentation as it was deemed too early in the project by the design team.</p> <p>Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can be easily mitigated early if the Architects or Managing Agency was to discuss this project prior to commencement, throughout its build and by following the advice given. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p><u>Section 2 - Secured by Design Conditions and Informative:</u></p> <p>In light of the information provided, we request the following Conditions and Informative:</p> <p>Conditions:</p> <ul style="list-style-type: none"> <li>a) Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. The development shall only be carried out in accordance with the approved details.</li> <li>b) Prior to the first occupation of each building or part of a building or use, 'Secured by Design' certification shall be obtained for such building or part of such building or use.</li> <li>c) The Commercial aspects of the development must achieve the relevant Secured by Design certification at the final fitting stage, prior to the commencement of</li> </ul>	

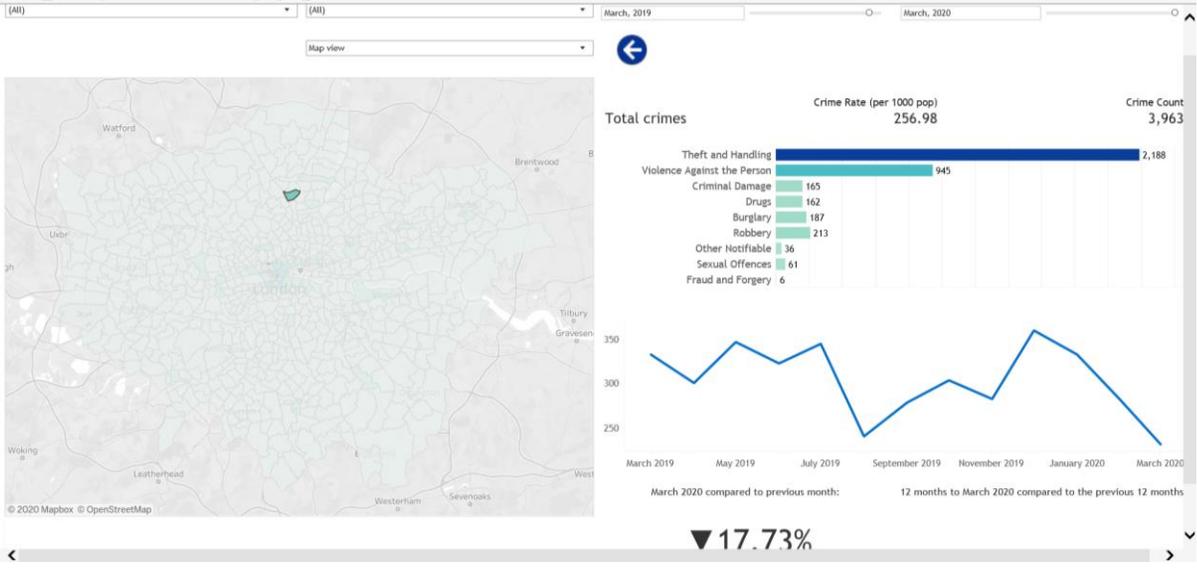
Stakeholder	Comment	Response
	<p>business and details shall be submitted to and approved, in writing, by the Local Planning Authority.</p> <p>Reason: In the interest of creating safer, sustainable communities.</p> <p>Informative:</p> <p>The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p> <p><u>Section 3 - Conclusion:</u></p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p> <p style="text-align: center;"><u>Appendix 1: Concerns and Comments</u></p> <p>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 LBoH planning portal. Site specific advice may change depending on further information or site limitations as the project develops:</p> <ul style="list-style-type: none"> <li>• Boundary Treatment – Site specific recommendations</li> <li>• Under-croft – The adjacent ramp provides a dark sheltered area that will support rough sleeping, anti-social behaviour, graffiti and street crime, this area must be lit to a minimum of BS 5489:2013</li> </ul>	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> <li>• Car Parking – It's not clear who will have access to park under the ramp area, this needs to be clarified</li> <li>• Door/Window Specifications – Site specific recommendations provided to design team</li> <li>• 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.</li> <li>• The perimeter treatment/gates - The design should not provide opportunities to climb. If such examples cannot be designed out and climbing may be possible then vulnerable properties must achieve a minimum of LPS 175 SR1.</li> <li>• Communal Entrance - Site specific recommendations provided to design team</li> <li>• Lobby/Airlock – Site specific recommendations provided to design team</li> <li>• CCTV – It is advised that CCTV is installed covering the main entrance, the hallway/airlock/postboxes 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.</li> <li>• 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</li> </ul>	

Stakeholder	Comment	Response
	<p>is to be delivered into an airlock then these should be securely surface mounted and meet TS009 standard.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Bin Storage – External entrance door should be a single LPS 1175 SR2 UKAS certified door-set 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.</li> <li>• 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.</li> </ul> <p style="text-align: center;"><u>Appendix 2: Planning Policy</u></p> <p>DMM4 (Policy DM2) Part A(d) <i>"Have regard to the principles set out in 'Secured by Design'"</i></p> <p>DMM5: Para 2.14 - <i>"Proposals will be assessed against the principles of secured by design'. The latest published guidance in this respect should be referred."</i></p>	

Stakeholder	Comment	Response
	<p>An Independent Sustainability report by AECOM on Tottenham area action plan states: <i>"Crime is high in Tottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly associated with Northumberland Park and Tottenham Hale"</i>.</p> <p>12.3 of same report states:</p> <ul style="list-style-type: none"> <li>• Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduce levels of crime, fear of crime and anti-social behaviour. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development.</li> <li>• There are no references to crime in the overarching policies, although it is recognised that housing and economic policies aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more stable communities. AAP 06 includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places.</li> <li>• There are no references to crime in the neighbourhood area sections; however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard. Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated.</li> <li>• In conclusion, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in</li> </ul>	

Stakeholder	Comment	Response																						
	<p>Tottenham, including particularly in Northumberland Park where crime levels are highest.</p> <p style="text-align: center;"><u>Appendix 3: Crime Figures</u></p> <p>The crime figures provided below are publicly available on the Internet at <a href="http://www.met.police.uk/">http://www.met.police.uk/</a>. The figures can at best be considered as indicative as they do not include the wide variety of calls for police assistance which do not result in a crime report. Many of these calls involve incidents of anti-social behaviour and disorder both of which have a negative impact on quality of life issues.</p> <p>Haringey is one of 32 London Boroughs policed by the Metropolitan Police Service. It currently has crime figures above average for the London Boroughs and suffers from high levels of crime and disorder to its residents and business communities.</p> <p>The following figures relate to recorded crime data from Police.uk for the below area:</p>  <p>The screenshot shows the following data for Haringey:</p> <table border="1"> <thead> <tr> <th>Crime Type</th> <th>Crime Count</th> </tr> </thead> <tbody> <tr> <td>Total crimes</td> <td>34,592</td> </tr> <tr> <td>Theft and Handling</td> <td>13,700</td> </tr> <tr> <td>Violence Against the Pers..</td> <td>10,113</td> </tr> <tr> <td>Robbery</td> <td>2,827</td> </tr> <tr> <td>Burglary</td> <td>2,804</td> </tr> <tr> <td>Criminal Damage</td> <td>1,995</td> </tr> <tr> <td>Drugs</td> <td>1,737</td> </tr> <tr> <td>Sexual Offences</td> <td>810</td> </tr> <tr> <td>Other Notifiable</td> <td>551</td> </tr> <tr> <td>Fraud and Forgery</td> <td>55</td> </tr> </tbody> </table> <p>The line graph shows the total crime rate (per 1000 pop) from March 2019 to March 2020. The rate starts at approximately 2800 in March 2019, drops to 2650 in May 2019, rises to 3000 in July 2019, falls to 2450 in September 2019, rises to 2850 in November 2019, and then gradually declines to approximately 2400 by March 2020. A horizontal line at 1.92 represents the current crime rate.</p>	Crime Type	Crime Count	Total crimes	34,592	Theft and Handling	13,700	Violence Against the Pers..	10,113	Robbery	2,827	Burglary	2,804	Criminal Damage	1,995	Drugs	1,737	Sexual Offences	810	Other Notifiable	551	Fraud and Forgery	55	
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	 <p>The screenshot shows a crime data dashboard for Epsom. It features a map on the left, a bar chart titled 'Total crimes' on the right, and a line chart below the bar chart. The bar chart lists the following categories and counts: Theft and Handling (2,188), Violence Against the Person (945), Criminal Damage (165), Drugs (162), Burglary (187), Robbery (213), Other Notifiable (36), Sexual Offences (61), and Fraud and Forgery (6). The line chart shows the crime rate per 1000 population from March 2019 to March 2020, with a total crime count of 3,963. A summary at the bottom indicates a 17.73% decrease in the crime rate per 1000 population compared to the previous 12 months.</p>	
London Fire Brigade	<p>The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London. The Commissioner has been consulted with regard to the above-mentioned premises and makes the following observations:</p> <p>The Applicant is advised to ensure the plans conform to Part B of Approved Document of the Building Regulations and that the application is submitted to Building Control/Approved Inspector who in some circumstances may be obliged to consult the Fire Authority.</p> <p>I also enclose Guidance note 29 on Fire Brigade Access similar to that in B5 of the Building Regulations, Particular attention should be made to paragraph 16, Water Mains and Hydrants, by the applicant.</p>	<p>Noted.</p> <p>Whilst a Building Regulations matter, it is recommended that the standard informative relating to the installation of sprinklers be attached to the planning permission should it be granted.</p>

Stakeholder	Comment	Response
	<p>The Commissioner strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers, and can reduce the risk to life. The Commissioner's opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupier. Please note that it is our policy to regularly advise our elected Members about how many cases there have been where we have recommended sprinklers and what the outcomes of those recommendations were. These quarterly reports to our Members are public documents which are available on our website.</p>	