

Appendix 1: Consultation Responses from internal and external agencies

Stakeholder	Comments	Response
INTERNAL		
Design Officer	<p><u>Site Location and Context</u></p> <ol style="list-style-type: none"> 1. The site is a small “island” (or almost-an island), a thin slither of land between the Lee Navigation canal and the Pymme’s Brook, on the north side of Ferry Lane in Tottenham Hale, right beside Tottenham Locks on the canal and just north of the point where the canal and Pymme’s Brook joins the River Lee. This part of the Lee Valley has large areas of long standing and recent public open space, such as Tottenham Marshes which touch the northern edge of the site, a thin slither adjoins on the west bank of Pymme’s Brook and which widens out considerably and extends for several miles to the north, and Walthamstow Wetlands, just 350m east, with The Paddock, a small semi-wild park that is effectively an extension of the Wetlands closer still, and these are all part of the Lee Valley Regional Park. 2. However its immediate neighbours to the east, at the other side of Tottenham Lock, and west of Mash Lane on the other side of Pymme’s Brook (& the thin slither extension of Tottenham Marshes) are major, high rise, residentially led development sites, Hale Wharf and Hale Village respectively. Tottenham Hale Station is immediately west of Hale Village, 250m from this site, and immediately west of that is the emerging high rise development of Tottenham Hale District Centre. The site, although small, therefore has tremendous potential for development, with unparalleled doorstep access to services and amenities. 3. The site is part of the same Site Allocation as Hale Wharf (and a further plot of land, a former petrol station, east of Hale Wharf, as “TH9: Hale Wharf” in the Tottenham Area Action Plan (TAAP, adopted July 2017). The site allocation is for: 	<p>Comments noted. Materials to be controlled by condition.</p>

	<p><i>“Comprehensive redevelopment to provide a mix of uses, with replacement employment floorspace, new residential and a leisure destination linked to the Lee Valley Regional Park..”</i></p> <p>The allocation notes that the site “distinctive riverside development on this site, including an element of replacement employment floorspace, and a new link to the currently underused Paddocks and wider Lee Valley Regional Park from Tottenham Hale District Centre”. Relevant Site Requirements are: a site-wide masterplan (“...and the Lock Keepers Cottage to the east should be developed as part of a comprehensive proposal”), mixed-use employment-led development, accommodate part of the Green Grid (of pedestrian and cycle links to and between parks and green spaces), have regard to environmental, ecological interests in the locality, particularly relating to the water environment and habitat of the Lee Valley Regional Park. Relevant Development Guidelines are; enable the ongoing operation and maintenance of the lock gates, not adversely impact on ecological assets, include a range of unit sizes and types and take advantage of the site’s suitability for family housing, heights will have to respond to the site’s location within the Lee Valley Regional Park, be orientated to allow a continuous sight line from the Green Link into the Lee Valley Regional Park, be designed having regard to risks of flooding, ensure opportunities to enhance the ecological status of the rivers, reduce flood risk and ensure access for future maintenance and replacement of the river walls.</p> <p>4. These proposals are in a sense the second to last piece in the jigsaw of development opportunities along Ferry Lane where it enters the Lee Valley; the Hale Village development has been completed except for its last development plot, the tower currently under construction. And the Hale Wharf development was granted permission by the Mayor Of London (after Haringey had refused) and is now well under way, with its two towers and its bridges over Pymme’s Brook and the Lee Navigation, approaching completion. The masterplan requirements of the Site Allocation have in effect been negated by the Hale Wharf planning permission (that no development has yet come forward for the former petrol station is of no relevance to this application as they are separated by the far larger Hale Wharf), and their</p>	
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Stakeholder	Comments	Response
	<p>bridges, paths and spaces provide the connections and compatibility with the Regional Park required.</p> <p><u>Form, Pattern of Development, Bulk & Massing</u></p> <p>5. The proposals' form respond to the riverine island setting by moulding to the island plan with an almost boar-like plan with narrow ends widening in the middle, and reinforce that form with a sloping top rising gently from its southern end to a peak and dropping off more steeply at its northern end. This creates a series of roof terraces, planted with intense and climbing greenery, between glazed facades at its southern and northern ends, climbing up and over the roof, contrasting with two hard, monumental brick walls curving around the two longer sides. This is considered an appropriate response to the contrast between the park and river settings to the north and south, as it almost "carries the park over the building", with the large built mass to either side.</p> <p>6. Therefore within this sloping form, the proposals rise from 3 storeys on the Ferry Lane frontage, to six storeys at its maximum, at about $\frac{3}{4}$ of its length, before dropping more steeply to 3 storeys at its northern end. Albeit that the northern end ground floor height is taller the canal towpath ground level being almost half a storey below the Ferry lane pavement ground level, and that the steeper drop and shallower balconies at the northern end will make more of the height visible. However the maximum 6 storeys height is not excessive and will not be out of character with the context, given the taller height of neighbouring developments and the reason they were considered acceptable, that they are "islands" of development surrounded by large areas of open space (much of it water) applies equally or even more so to this modest proposal.</p> <p>7. That the proposals fill most of the site is also made acceptable by the large amounts of open space around them. The proposals also promise to bring lively active frontages to the short street frontage onto Ferry Lane and longer canal towpath side, and most of all to the short café patio to the northern end, a short distance south of the new pedestrian bridges. The least lively, most private, western side, where it will</p>	

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	<p>be built close to the Pymme's Brook, which is currently somewhat secretly concealed by the landscaped strip / extension of Tottenham Marshes on its western bank from the Ferry Lane street frontage, responds to that with a private, cantilevered walkway, primarily for servicing, and windows onto the more private residential circulation, whilst not harming the ecology of the river.</p> <p>8. Panoramic views up and down the waterways from the various bridges are listed in the Council's Locally Significant Views and Vistas under policy DM5 of the Development Management DPD (adopted 2017). Neither the precise viewpoint nor the precise viewed point are specified for these views, and indeed the description as a panorama indicates that no specific viewed point is required, so much as an expanse of openness. This scheme will protect those panoramas by presenting its narrow blade-like ends to the views and its broad sides across those views, and actually enhance them by adding further framing of those views.</p> <p><u>Elevational Treatment, Fenestration, including Balconies, and Materials</u></p> <p>9. Ground floor fenestration and how that brings active frontage is mentioned above and provides a fully public, fully active, shopfront style frontage to the northern and southern ends, as well as more distanced but still active office windows onto the canal towpath side.</p> <p>10. The mostly open glazed southern and northern end elevations respond to this public presence as the main entrances and café at ground level, and then, through one or two floors of primary office frontage, become more private main living room elevations to the proposed flats, where the terraces start stepping back, giving them privacy by being distanced behind terraces and, in the more busy, trafficked southern end, additional planted areas in front of terraces, as well as in both office and residential and office floors being partially screened behind areas of mesh up which climbing plants will be trained.</p> <p>11. The regular pattern of punched windows, interspersed with more occasional recessed balconies and projecting bays, of the two side elevations, respond strongly to the "warehouse vernacular" style of the Hale Wharf development, whilst the more</p>	

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	<p>modelled, streamlined shape respond more to the buildings of Hale Village. In particular the inscribed pitched form within the patterning of the brick flank elevations makes specific reference to Hale Wharf and give the proposed flank elevations an elegant, orderly composition which nevertheless expresses the difference between the workspace and residential functions of the lower and upper floors. A rhythm is imparted to the elevations via grooves cut into the brickwork, giving the longer flanks a grain of a more domestic scale.</p> <p>12. Two different brick colours are proposed for the elevations and brick patterning to further express the rhythm and functionality of the proposals, which will be complimentary to the context and a striking, attractive addition to the unfolding composition of distinctive buildings along Ferry lane and up and down the canal, whilst appearing as a modest yet striking landmark building in longer views up and down the wider riverine and parkland views.</p> <p><u>Residential Quality (flat, room & private amenity space shape, size, quality and aspect)</u></p> <p>13. 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>14. All dwellings meet or exceed the private external amenity space in the London Plan, with private balconies or, generally generous roof terraces. Privacy of amenity space is achieved by most amenity space being roof terraces, screened to their sides by the monumental brick flank walls, only visible from the north and south where they are often behind vegetation. The four flats who's outdoor amenity spaces are balconies on the eastern side are recessed to provide privacy, and the short glass balustrade will not significantly harm that privacy or expose their clutter, being partially screened by neighbouring projecting bay windows and mainly seen obliquely.</p> <p>15. There are no single aspect flat in the whole development, although four on the eastern side rely for their second aspect on side windows to their recessed balconies and projecting bay windows. Eastern aspect is not a bad single aspect, and their views will be onto the wide open spaces and vibrancy of the canal, with the</p>	

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	<p>interesting main public square of Hale Wharf beyond, with views from their bay windows up or down the canal. This is a major benefit of the relatively small, narrow footprint, block form. All flats are at least dual aspect, many triple aspect, an exemplary achievement in a higher density urban development.</p> <p>16. There is also plentiful public open space, including equipped playspace, in many public parks and communal amenity spaces in neighbouring developments nearby.</p> <p><u>Privacy / Overlooking of Proposed Residents and Existing Neighbours</u></p> <p>17. There are no neighbouring residential buildings within 40m of the proposed development, that being the approximate distance to Coppermill Heights , the nearest block of Hale Village, to the west, and to the southernmost tower of Hale Wharf to the east.</p> <p>18. There is also, thanks to the layout, no possibility of “intervisibility” between residents of the proposed development.</p> <p><u>Daylight and Sunlight</u></p> <p>19. Of relevance to this section, Haringey policy in the DM DPD DM1 requires that:</p> <p style="padding-left: 40px;"><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"> <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> <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> 	

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	<p>20. 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>21. The assessment finds that the impact of the development on existing neighbouring residential properties is completely favourable for both daylight and sunlight, with no neighbouring existing window to a habitable room found to lose a noticeable amount of daylight, no neighbours losing a noticeable amount of sunlight to living rooms, and no neighbouring external amenity spaces losing a noticeable and relevant amount of sun on the ground,. The applicants' assessment also finds the proposals would achieve good levels of daylight to the proposed dwellings and to the café courtyard, all in accordance with the levels of the full recommendations of the BRE Guide.</p> <p>22. 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 compliance with the BRE Guide is an achievement well in excess of what is normally expected.</p> <p><u>Conclusions</u></p> <p>23. This is an interesting site, a small site, but highly visible, in a notable location, almost literally an island, and now that has all the characteristics and appearances of being an island. The innovative and striking design responds well to this highly visible site,</p>	

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	<p>providing an interesting development that will enliven the ground level, with a café that will provide animation and vibrancy to the already lively canal towpath and lock side location, as well as providing a useful service, providing much needed and useful employment uses that will enliven the Ferry Lane frontage, and providing high quality residential accommodation.</p> <p>24. The proposals were reviewed by the councils' Quality Review Panel (QRP) in July 2019. The panel strongly supported the strategic approach to development, scale, massing, architectural expression, sense of rhythm created by the repeated elements, and mix of uses, describing it as potentially a "jewel" within the surrounding context, but asked for certain refinements, which it was confident could be resolved in consultation with officers. These were primarily that it should no longer be entered off the canal towpath, but from the southern end on Ferry Lane, which should also be "greened", along with greening Pymme's Brook, refinements to internal layouts to reduce corridor lengths and improve kitchens screening south facing roof terraces from traffic noise, checking there wouldn't be any concern of overhearing, and improvements to the canal locks themselves.</p> <p>25. Since QRP, all these issues have been addressed except improvements to the canal locks, which are outside the scope and capability of this developer. The entrance to the flats and offices has indeed been moved to the southern end of the block, at a greened forecourt on Ferry Lane which will also contain a lift to provide accessible access to the towpath alongside the retained, steep historic horse steps, the servicing access down the west side has been made a cantilevered deck to enable waterside plant growth, and internal layouts have been improved including to give most flats a direct view from their entrance door to their balcony. Further refinements have recently included confirmation of details of the dry riser system that will permit easier fire fighting, greater transparency to the entrances allowing passive surveillance, a toning down of some of the brick patterning and confirmation of the Canals and Rivers Trust's plans for improvements and landscaping to the locks.</p>	

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	<p>26. These further refinements confirm to officers that this proposal will indeed be a “jewel” in the emerging exemplary, accessible, inhabitable, sustainable, ecological landscape of the Lee Valley at Tottenham Hale.</p>	
<p>Transportation</p>	<p>This application is for redevelopment of the lock keeper’s cottage site north of Ferry Lane, to provide a mixed use development with commercial floor space, a café and 13 residential units. Overall in transportation terms, this is a small development and will not therefore create any adverse highway or public transport network or capacity issues. It has excellent accessibility to public transport services and is close by to local shops and services so is a well located development.</p> <p>Given the site’s unique location, without any vehicle access it is not possible to provide a blue badge parking space on the site, and it is proposed to locate an allocated space within the Hale Village development. This space is 150m walk away, so whilst some potential occupants of the full accessible unit would consider that acceptable it doesn’t meet the recommendations of BS8300. It is acknowledged that there is level/step free access to the space and that the site is very accessible with access to shops and services.</p> <p>Cycle parking is proposed to meet the requirements of the draft London Plan, however further details are required to demonstrate acceptability of the proposed arrangements, which can be covered by condition.</p> <p>The delivery and servicing demands are considered low, but will of course be an uplift from the present situation. It is unfortunate that to service the site requires stopping and dwelling in a mandatory cycle lane, however there is no real alternative. It is suggested that the draft delivery and servicing plan be updated as commented earlier to include a wider time period free of deliveries in the AM and PM peaks and for the applicant to provide a bi yearly update to review and recommend change to arrangements to minimise</p>	<p>Observations have been taken into account. The wheelchair accessible parking and delivery / servicing arrangements have been revised. Conditions will be included as appropriate.</p>

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	<p>the impact on highway users and in particular cyclists using Ferry Lane. This can be covered by condition.</p> <p>A draft CEMP has been submitted and a CLP will be developed up for submission and review prior to commencement of construction works. It is important that the applicant include in the CLP the details of the temporary highway arrangements required and that they liaise with and consult the Network Management Team to agree working practices.</p> <p>Finally, it is considered appropriate that this development makes a proportionate contribution towards improving access to and from the site and within the locality by active travel modes, to align with the Council's forthcoming Walking and cycling action plan, and to part mitigate the impacts on the cycling facilities along Ferry Lane.</p> <p>Subject to the above conditions (cycle parking details, D&S Plan, CLP) and an appropriate contribution towards improving facilities and connections by active travel, Transportation do not object to this application.</p>	
Housing	<p>In light of the negative viability and the fact that the scheme cannot support any affordable housing provision, the Housing Department has no comments or objections to the scheme.</p>	<p>Comments noted. Early and late stage viability reviews will be secured by legal agreement.</p>
Tottenham Hale Construction Co-Ordinator	<p>I've checked over the updated document – I'm happy with this and note the commitment now given by the scheme to consult with Highways on the timings / starting of works.</p>	<p>Comments noted.</p>

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SUDS (Drainage) Officer	<p>We've taken a look through the drainage strategy for this proposed development, as already identified there are few opportunities to have a broad range of SuDS solutions.</p> <p>The proposed SuDS, are Green roof and attenuation tank to manage surface water, consideration could be given to include permeable paving. There should be a management maintenance schedule for the chosen SuDS, that should include who will be responsible for this and this must be for the lifetime of the development. The Haringey, pro-forma will also need to be completed and returned to us for review once completed.</p> <p>The proposal for discharge of the surface water is to Pymmes Brook, the Environment Agency, would need to consent to this and issue the necessary permits for any construction of head walls that may impact the river.</p> <p>Please let me know if you require anything else from us at this stage.</p>	<p>Comments noted. Condition attached in respect of drainage management and maintenance. EA permit for works will need to be secured outside of planning process.</p>
Carbon Management	<hr/> <p>Carbon Management Comments 22/05/2020</p> <p>In preparing this consultation response, we have reviewed the Energy & Sustainability Statement (dated March 2020) prepared by XCO2, Design and Access Statement (dated April 2020) prepared by RM_A, and relevant supporting documents.</p> <p>Summary</p> <p>The development does not meet the policy requirements to achieve a zero-carbon development on site, particularly for the non-residential element of the scheme. It is requested that the applicant revisit the energy modelling to achieve further carbon reductions with a fabric first approach.</p>	<p>Comments noted. Conditions and legal agreement clauses included.</p>

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	<p>No information has been submitted for the overheating or non-domestic sustainability assessment, these have been requested and must be provided prior to the determination of the application. Detailed comments have been set out that should be addressed. Appropriate planning conditions will be recommended once this information has been provided.</p> <p>Energy – Overall</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 47.9% in residential carbon emissions and 14.8% improvement of commercial emissions. The report has been developed with SAP 2012 emission factors.</p> <p>The non-domestic element of the scheme does not even meet the minimum on-site carbon reductions as set out in the London Plan, let alone Haringey's 100% reduction requirement. The development needs to demonstrate that all measures have been incorporated on site before relying on a carbon offset payment.</p> <p>The remaining carbon emissions will need to be offset. The indicative carbon offset contribution due for this application, subject to the As Built SAP assessment, is £53,865. Please note the carbon offset is £95 not £90 per tonne of CO₂/year.</p> <table border="1"> <tr> <td></td><td>Domestic</td><td>Non-domestic</td></tr> <tr> <td>Baseline (tCO₂ per annum)</td><td>18.6</td><td>10.8</td></tr> </table>		Domestic	Non-domestic	Baseline (tCO₂ per annum)	18.6	10.8	
	Domestic	Non-domestic						
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	Saving in emissions (tCO ₂)	8.9	1.6	
	Residual CO ₂ emissions after energy hierarchy	9.7	9.2	
	% saving over baseline	47.9%	14.8%	
	Offset due (£95 x 30 years x residual emissions)	£95 x 30 x 9.7 = £27,645	£95 x 30 x 9.2 = £26,220	
	Total offset due	£53,865		
	<p>Energy – Lean</p> <p>The applicant has proposed an improvement of beyond Building Regulations by 1.2% through improved energy efficiency standards in the residential element and 8.4% improvement for the commercial element. This is far below the minimum 10% and 15% reduction respectively set in Policy SI2 in the Intended to Publish London Plan.</p> <p>A fabric-first approach is essential in reducing carbon emissions in the longer term. It will reduce heating costs for occupants and minimise the level of retrofit measures required to meet future energy efficiency standards. The applicant needs to revisit this section to get nearer to the Mayor’s 10% and 15% targets respectively.</p> <p>This could be achieved by improving u-values for the walls, reducing air permeability to below 3 m³/m²h @ 50Pa, proposing a MVHR system to recover ventilation heat loss (that will be more efficient with lower air permeability), improving the thermal bridging, and cooling demand can be reduced for the commercial units.</p> <p>Energy – Clean</p> <p>A 13.9% reduction is proposed for the residential element under Be Clean measures, and a 6.5% reduction for the commercial element. This is based on the proposal to connect to the Hale Village Energy Centre.</p>			

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	<p>The connection to Hale Village DEN has not been confirmed. The applicant should demonstrate that this connection will be commercially and technically viable and provide an indicative connection route. If not, the applicant should demonstrate alternative low carbon heat sources. Furthermore, Veolia say they can supply heat from biomass but probably will not. Have xCO2 included biomass within the assumptions?</p> <p>Energy – Green</p> <p>The application has reviewed the installation of various renewable technologies. A total 6.1 tCO₂ of emissions are proposed to be reduced under Be Green measures. This represents a 32.9% reduction from the baseline for the residential and 0% reduction for the commercial element. The report concludes that solar photovoltaic (PV) panels will deliver the Be Green requirement for the residential units.</p> <p>The solar array is proposed to be made up of a south-facing array on a 68m² roof area, with an efficiency of 19%. The peak output would be 12.9 kWp, which is estimated to produce around 11,783 kWh of renewable electricity per year. This equates to a yearly saving of 6.1 tCO₂.</p> <p>The office server room in the proposed development should be making use of renewable energy.</p> <p><u>Energy Strategy actions:</u></p> <ul style="list-style-type: none"> - Submit SAP output sheets. - Demonstrate the model is based on SAP2012 carbon factors. - Revisit the Be Lean energy demand reductions. E.g. the BRUKL sheets show that the actual energy consumption for heating and auxiliary is higher than the notional. - Confirm heating and cooling strategy for the non-residential units. - Confirm sub-metering will be installed for the commercial units. - Confirm there are no cooling requirements across the development at all. - What will the lighting specification be? 	

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	<ul style="list-style-type: none"> - Residential lighting energy demand can be reduced by introducing daylight control and occupancy sensing for communal areas. - No details around the thermal bridging have been included. The proposals should seek to reduce this as much as possible. - Have xCO2 included biomass within the DEN assumptions? - Confirm connection to Hale Village energy centre is possible, and through what connection route. <p>Overheating</p> <p>The overheating modelling has only been undertaken with SAP and SBEM software. The development must undertake dynamic thermal modelling to analyse overheating adequately.</p> <p>The development cannot rely on the installation of internal blinds to reduce overheating risk. This puts the onus on occupiers managing overheating, which is subject to clear instructions being provided when occupants move in and through a building guide. Internal blinds can also be removed. The development should use passive design measures to reduce overheating first.</p> <p>Using thermal mass to regulate temperatures relies on adequate night-time ventilation that does not allow the room to heat up when the thermal mass releases its heat. Details of this must be provided.</p> <p><u>Overheating actions:</u></p> <ul style="list-style-type: none"> - Submit a Dynamic Overheating Modelling report, with CIBSE TM49 weather files (DSY1-3 and 2020s, 2050s and 2080s weather patterns). This must be in line with TM59 for the residential dwellings and TM52 for the offices. - Mitigation for overheating must be integrated within the design for 2020s weather file. - The risks, impacts and mitigation strategy should be set out for the future weather patterns. Full compliance should be demonstrated for the 2020s and 2050s through 	

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	<p>passive and building design solutions, and requirements for cooling in the 2020s need to be fitted now. For 2050s and 2080s periods, if new measures are required, a "retrofit" plan should set out how they will be installed, reviewing visual impacts and enabling future delivery. This should ensure, for example, that the structure can accommodate the fitting of Brise Soleil or ceiling fans.</p> <ul style="list-style-type: none"> - We need a statement from the applicant that there is a named person who will manage and own the overheating risk going forward. They should be named in this report so that if residents have an issue, we can sign post them to the responsible / liable party. <p>Sustainability Assessment</p> <p>Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The Sustainability section in the report sets out the proposed measures to improve the wider sustainability of the scheme.</p> <p>The applicant has not submitted a BREEAM Pre-Assessment Report (or equivalent) for this application. Policy SP4 requires this.</p> <p><u>Sustainability actions:</u></p> <ul style="list-style-type: none"> - Submit a BREEAM Pre-Assessment. - Respond to the following: <ul style="list-style-type: none"> ○ How will the development reduce and avoid water pollution from runoff into Pymmes Brook and the River Lee Navigation? ○ Will there be any rainwater harvesting to help maintain the proposed landscaping? ○ There are existing buildings on the site. What materials will be reused on the site and what % of materials can be reused elsewhere? ○ Will the development be using a lower embodied energy concrete? 	

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	<ul style="list-style-type: none"> ○ Will the non-residential units have access to appropriate dry, food and other recycling facilities? ○ How will the double stack bike racks be accessed by residents, the configuration looks awkward and too crowded. ○ How will the stepped green roofs be accessed and maintained, and by who (e.g. on 2nd, 3rd and 4th floors)? We support green roofs, but to be effective they should be maintained properly. ○ What is the proposed substrate depth of the living roofs? ○ Please provide details on the proposed intensive living walls, how these will be established and planted. ○ How will the removal of three trees be compensated within the scheme and provide biodiversity net gain? <p>Carbon Management Comments 12/06/2020</p> <p>Further information has been provided on 12/06/2020 in response to the comments above: Response to Haringey Comments letter (dated 12/06/2020), SAP files (Be Lean, Clean, Green, thermal bridging), BREEAM 2018 Pre-Assessment (dated 12/06/2020), Veolia Calculations and correspondence (dated 24/10/2019), TM59 Overheating Design Note by XCO2 (dated 12/06/2020) and TM52 Overheating Design Note by XCO2 (dated 09/06/2020).</p> <p><u>Overheating</u></p> <p>This report assesses the overheating risk for the office spaces through dynamic thermal modelling in line with CIBSE TM52 and in line with TM59 for 5 residential dwellings (15 rooms). It models DSY1, 2 and 3 for the 2020s weather file, and the 2050s and 2080s future weather files for DSY1.</p> <p>Office spaces:</p>	

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	<ul style="list-style-type: none"> - DSY1 2020s high emissions 50% percentile weather file was passed through the use of energy efficient lighting, g-value of 0.4, and window openings of 50% for natural ventilation. - To pass the 2050s files, external fins, internal blinds, secure night-time ventilation and exposed thermal mass in the office ceilings would be required. <p>Dwellings:</p> <ul style="list-style-type: none"> - DSY1 2020s high emissions 50% percentile weather file was passed with the following mitigation measures: window opening areas of at least 50%, night-time ventilation, internal venetian blinds in kitchen/living rooms, and a g-value of 0.63. - To pass future weather files, the applicant proposes these mitigation measures are incorporated: external fins, internal blinds, solar control glazing (g-0.3), exposed thermal mass and active cooling. <p>A planning condition has been drafted to secure these mitigation measures within the design.</p> <p><u>BREEAM</u></p> <p>A BREEAM Score of 63.22% can be achieved on this development, which equates to a Rating of 'Very Good'. This is policy compliant and it demonstrates that it is targeting a higher score than the minimum requirement. The applicant is encouraged to aim for an 'Excellent' score during the detailed design stage.</p> <p>A planning condition has been drafted to secure the delivery of a 'Very Good' rating.</p> <p><u>Other Energy & Sustainability matters</u></p> <p>The clarifications and additional information provided by the applicant are sufficient to address the concerns.</p> <p><u>Conclusion</u></p>	

Stakeholder	Comments	Response
	Subject to the use of appropriate planning conditions, this scheme has demonstrated it is policy compliant and can be supported from a carbon management perspective.	
Pollution	<p>Having considered all the submitted supportive information i.e. Design and Access Statement dated April 2020, Planning Statement dated April 2020 taken note of the applicant submission that there will be no combustion emission from the site energy centre because it will be connected to Hale Village District Heating Scheme, Air Quality Assessment Report prepared by XCO2 dated March 2020 taken note of the proposed highly recommended mitigation measures in Table 11 and the Desk Study Report with reference GE18350-DSR-APRIL 20 prepared by Geo-Environmental Ltd dated 1st April 2020 taken note of the likelihood of the presence of an asbestos at the site, Table 3.6 (Possible Receptors of Contamination) and section 4 (Conclusions and Recommendation), please be advise 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.</p> <p><u>1. Land Contamination</u> Before development commences other than for investigative work:</p> <ol style="list-style-type: none"> Using the information already acquired from the submitted desk study/preliminary risk assessment, a diagrammatical representation (Conceptual Model) for the site 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. 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, 	Comments noted. Conditions included.

Stakeholder	Comments	Response
	<p>refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.</p> <ul style="list-style-type: none"> 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. 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><u>Reason:</u> To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p><u>2. 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 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><u>Reasons:</u> 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><u>3. NRMM</u></p> <ul style="list-style-type: none"> 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 	

Stakeholder	Comments	Response
	<p>EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.</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. Combined Heat and Power (CHP) Facility Prior to the commencement of the development, details of the Combined Heat and Power (CHP) facility and associated infrastructure shall be submitted in writing to and for approval by the Local Planning Authority. The details shall include:</p> <ul style="list-style-type: none"> a) location of the energy centre; b) specification of equipment; c) flue arrangement; d) operation/management strategy; and e) the method of how the facility and infrastructure shall be designed to allow for the future connection to any neighbouring heating network (including the proposed connectivity location, punch points through structure and route of the link) f) details of CHP engine efficiency 	

Stakeholder	Comments	Response
	<p>The Combined Heat and Power facility and infrastructure shall be constructed in accordance with the details approved, installed and operational prior to the first occupation of the development and shall be maintained as such thereafter.</p> <p><u>Reason:</u> To ensure the facility and associated infrastructure are provided and so that it is designed in a manner which allows for the future connection to a district system.</p> <p><u>5. Combustion and Energy Plant</u> 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><u>Reason:</u> As required by The London Plan Policy 7.14.</p> <p><u>6. Demolition/Construction Environmental Management Plans</u></p> <ul style="list-style-type: none"> 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 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>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>	

Stakeholder	Comments	Response
	<p>b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:</p> <ul style="list-style-type: none"> i. A construction method statement which identifies the stages and details how works will be undertaken; 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; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding; viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance); ix. Details of external lighting; and, x. Details of any other standard environmental management and control measures to be implemented. <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"> i. Monitoring and joint working arrangements, where appropriate; ii. Site access and car parking arrangements; iii. Delivery booking systems; iv. Agreed routes to/from the Plot; 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 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 vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching. 	

Stakeholder	Comments	Response
	<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"> i. Mitigation measures to manage and minimise demolition/construction dust emissions during works; ii. Details confirming the Plot has been registered at http://nrmm.london; iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection; 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); v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate. <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><u>Reason:</u> To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.”</p> <p><u>Informative:</u></p> <ul style="list-style-type: none"> 1. Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out. 	

Stakeholder	Comments	Response
Waste Management Officer	<p>Yes that looks like a workable solution in relation to storage and collection of residential waste.</p> <p>Please be advised we do not provide guidance of commercial waste requirements other than saying it cannot be stored or collected alongside residential waste. It is for the business owner to ensure they have a waste collection system in place to ensure that it does not end up on the public highway and become detrimental to the local amenity.</p>	<p>Comments noted.</p> <p>Commercial waste collection arrangements shall be secured privately.</p>
Tottenham Team	<p>I am currently delivering a scheme onsite along Ferry Lane (next to the lock keepers cottage site) that focuses on cycling and walking improvements; further details on the improvements being delivered currently on Ferry lane can be found in the attached presentation.</p> <p>Are open space improvements being sought from the applicant under the s106 heads of terms? -If yes, then the Paddock in Tottenham Hale (TH) which is the nearest open space to the applicant site has been earmarked for improvements and my colleague Nick cc'd in is leading on this along with Christopher Patterson from Parks Service. The Paddock is a major regen project requiring significant funding with c£0.5m collected to date from s106 contributions- that being from nearby Hale Wharf that is located next to the gate keepers cottage. It would be great if we could secure some open space s106 contributions from this applicant.</p>	<p>Cycling and walking improvements are currently being delivered. A contribution towards the paddock has been secured via legal agreement.</p>
Tree and Nature Conservation Manager	<p>I have reviewed it and been on site. The trees are categorised as B and C trees and are unlikely to meet the criteria for a TPO. I am happy that the Willow is to be retained as this has the highest amenity value. Protective measures have been specified in the AMS for this tree and if adhered to, should ensure there are no detrimental impact on this tree.</p>	<p>Comments noted.</p> <p>Conditions included for</p>

Stakeholder	Comments	Response
	<p>However, its disappointing there is a 'lack of space' on site for new trees. For this reason, can you please seek funding for Haringey to plant new trees nearby in the public realm. There are suitable locations in the footway on Ferry Lane, adjacent to Coppermill Heights and also within the Ferry Lane estate opposite.</p>	<p>new tree planting and landscaping.</p>
<p>Emergency Planning</p>	<p>It is very often the case that in order to attend an emergency incident, the emergency services have to close off a main arterial route. I would not object to a planning application on that basis.</p> <p>Looking more closely at the plans, I can see there is land to north of the site as well as access to Ferry Lane so I would not foresee an insurmountable problem with evacuation of the site.</p> <p>I therefore have no objections.</p>	<p>Comments noted.</p>
<p>Noise ASB Officer</p>	<p>Commentary I have reviewed the information provided in respect of the above and particularly the Noise Assessment (Reference No 1918965) and the Construction Environmental Management Plan, June 2020 (CEMP).</p> <p>CEMP and construction impacts. We note that the predominant sound likely to impact site end users is road traffic on Ferry Lane. The measures proposed in the CEMP to address vibration from the demolition / construction phases of the development is likely to be sufficient. and expect that the potential for nuisance from vibration is likely to be low for this development.</p> <p>Noise Nuisance We note and accept the following:</p>	<p>Comments noted. Conditions will be added to any planning permission.</p>

Stakeholder	Comments	Response
	<ul style="list-style-type: none"> - It may be difficult to achieve the WHO noise levels in amenity areas at the southern façade of the building, and that - it may be difficult to achieve the acoustic standards with windows open for this development (and accept that measures to mitigate against this have been suggested as the provision of solid balustrades and provision of background ventilation in compliance with Building Regulations Part F); <p>We will still require the applicant to meet and comply with BS 8233:2014 where practicable and confirm the actual impacts for site end users by undertaking pre- and post-completion testing to verify this. As a result the scheme of sound insulation for the proposed residential development will need to be submitted for approval prior to commencement of the development and further verification testing required post completion and prior to occupation of the development.</p> <p>We would also expect that any assessment of the local noise environment includes consideration of all mechanical plant, namely that serving to ventilate the residential properties as well as that serving the commercial element of the development.</p> <p>Commercial / Café End Use</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, it has been <u>recommended</u> that the following clause in any tenancy agreement is adopted;</p> <p><i>'Noise levels generated by commercial activity should not exceed NR 15dB Lmax in any adjoining residential property.'</i></p>	

Stakeholder	Comments	Response											
	<p>Conclusion</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>Internal Noise Levels within Residential Units (in accordance with BS8233:2014)</p> <table border="1"> <thead> <tr> <th>Time</th><th>Area</th><th>Maximum Noise level</th></tr> </thead> <tbody> <tr> <td rowspan="2">Daytime Noise 7am – 11pm</td><td>Living rooms and Bedrooms</td><td>35dB(A)</td></tr> <tr> <td>Dining Room/Area</td><td>40dB(A)</td></tr> <tr> <td>Night Time Noise 11pm - 7am</td><td>Bedrooms</td><td>30dB(A)</td></tr> </tbody> </table> <p>With no individual noise events to exceed 45dB L_{Amax} (measured with F time weighting) in bedrooms with windows closed between 23.00hrs - 07.00hrs.</p> <p>Condition: Sound Insulation between Residential and Commercial Properties. Sound insulation between the commercial premises on the ground floor and residential units on level 1 shall 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>Condition: Plant Noise Design Criteria</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	Comments	Response
	<p>Noise arising from the use of any plant and associated equipment <u>shall not exceed</u> the existing background noise level (LA90 15mins) when measured at 1 metre external (LAeq 15mins) from the nearest residential or noise sensitive premises.</p> <p>Condition: Plant Noise Design Criteria (commercial) <i>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. 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'.</i></p> <p><i>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.</i></p> <p>Condition: Odour control equipment (commercial) <i>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.</i></p>	

EXTERNAL		
	DVS Viability Conclusion	

Financial Viability Consultant	<p>Having regard to the hierarchy specified, it is the considered conclusion of the DVS valuer that this scheme cannot viably support the provision of Affordable Housing.</p> <p>Additional Comments</p> <ul style="list-style-type: none"> • DVS have used the residual appraisal methodology, as is established practice for viability assessments. In simple terms the residual appraisal formula is: • Gross Development Value less Gross Development Cost (inclusive of S106 obligations, abnormal development costs and finance) less Profit, equals the Residual Land Value. • The Residual Land Value is then compared to the Benchmark Land Value as defined in the Planning Policy Guidance on Viability. • Where the Residual Land Value produced from an appraisal of the proposed scheme is lower than the Benchmark Land Value, the scheme is financially not viable to support the provision of Affordable Housing and vice versa. • I have undertaken two appraisals to assess the Residual Land Value for the proposed policy compliant scheme and the All-Private scheme. • Once the Gross Development Costs for the proposed scheme, including finance and profit, are removed from the sum received for the total sales of all the proposed new-build units (Gross Development Value), the Residual Land Value does not exceed the site's Benchmark Land Value which is derived from the value of the houses on the site. • This is due to the fact that gross development costs exceed the sales revenue generated from the proposed scheme. 	<p>Comments noted. Early and late stage viability reviews will be secured through legal agreement.</p>
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	<ul style="list-style-type: none"> • The reason for high build costs is due to design complexities involved with construction on a narrow and constrained site situated next to a canal. This also includes the provision of a lower ground floor, which involves excavation and additional reinforcement. • I have therefore agreed to adopt BCIS upper quartile build costs to reflect the upper end of the range of build costs warranted by the restricted nature of the site and its location. • Based on the above, the Residual Land Value of the proposed All-Private scheme is -£57,065. The Residual Land Value for the policy compliant scheme is -£702,090. I have compared this with the Benchmark Land Value of the site. • The Benchmark Land Value of the site is £990,000 which is sum of the Existing Use Value of the site (£825,000-derived from the value of the houses) and a 20% premium (£165,000). • The Residual Land Value does not exceed the Benchmark Land Value of the site and the proposed scheme is therefore not considered viable enough to support the provision of Affordable Housing whilst maintaining the minimum required level of profit. 	
Thames Water	<p>Waste Comments</p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to 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 sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any</p>	<p>Observations have been taken into account and conditions and informatives included as appropriate.</p>

	<p>piling must be undertaken in accordance with the terms of the approved piling method statement.” Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p>As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p> <p>We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.</p>	
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	<p>Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.</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. https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices</p> <p>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>Water Comments</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or</p>	
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	<p>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>https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-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. https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk</p>	
London Fire Service	<p>The Commissioner is not satisfied with the proposals as fire fighting access not shown.</p> <p>Revised Comments</p> <p>The Commissioner is satisfied with the proposals for fire fighting access.</p>	Initial comments given in error. Revised comments noted.
Metropolitan Police	<p>Section 1 - Introduction:</p> <p>Thank you for allowing us to comment on the above planning proposal.</p>	Observations have been taken into account and

	<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>We have not met with the project Architects or Agents to discuss Crime Prevention or Secured by Design (SBD). The Architects have provided a separate Security & SbD Appraisal Document that is comforting to read but will still need to be enhanced but the intention to include SbD from the onset is welcomed by ourselves.</p> <p>We welcome the construction of the project and continue to require the attaching of suitably worded conditions and an informative. Any comments made can be easily mitigated early and we would seek your assistance in encouraging the design team 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 Gold/Silver Secured by Design Award & Accreditation if advice given is adhered to.</p> <p>Section 2 - Secured by Design Conditions and Informative:</p> <p>In light of the information provided, we request the following Conditions and Informative:</p> <p>Conditions:</p>	<p>amendments to the plans made where possible. Condition included.</p>
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	<p>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.</p> <p>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.</p> <p>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 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>Section 3 - Conclusion:</p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p> <p>Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.</p> <p>Yours sincerely, Leslie Gipps 707TP</p>	
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	Designing Out Crime Officer Metropolitan Police Service	
Transport for London	<p>The site of the proposals is located off the A503, Ferry Lane, approximately 400 metres east of the junction with Broad lane which forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN and is therefore concerned about any proposal that may affect the performance and/or safety of the TLRN.</p> <p>TfL object to the proposals as the servicing strategy currently proposed will have an unacceptable impact upon cyclist and pedestrian safety and amenity along Ferry Lane. Further details follow below.</p> <ul style="list-style-type: none"> Proposals to provide level access from Ferry Lane to building's front entrance and enhance the public realm adjacent to the towpath are welcomed in line with Intend to Publish (ItP) London Plan policies T2 and D8. TfL welcome proposals for a car-free scheme given the site's excellent public transport accessibility level. The location of one blue badge space on the nearby Waterside Way is considered acceptable. The quantum of residential long-stay cycle parking complies with ItP London Plan minimum standards which is welcomed. The applicant should provide the Gross External Area (GEA) for the commercial and café uses to enable assessment of the associated cycle parking quantum against the ItP London Plan minimum standards. <p>TfL hold concerns with the somewhat secluded location of commercial cycle parking within the servicing area at lower ground floor level, with limited surveillance and away from the pedestrian desire lines along Ferry Lane and the towpath. The applicant should clarify security measures in place for this external bike store.</p>	<p>Comments noted.</p> <p>Servicing arrangements were amended and are now acceptable.</p> <p>Conditions will secure detailed delivery and servicing plan and CEMP, amongst other measures.</p>

	<p>Further details on the design of cycle parking should be provided to demonstrate how this provision will be designed and laid out in accordance with the London Cycling Design Standards. This should include stand, corridor and aisle width dimensions.</p> <ul style="list-style-type: none"> • The trip generation associated with the proposals is considered acceptable. • A framework travel plan has been produced. Given the site's excellent accessibility and car-free nature, it is welcomed that travel plan targets and measures focus upon increasing the active travel mode share in line with the Mayor's Transport Strategy mode shift target. • The proposed servicing arrangement is not acceptable. There is a mandatory cycle lane on Ferry Lane and the only access is via a ramp. Stopping here wouldn't be acceptable as vehicles are not meant to drive in a cycle lane or park here. The primary issue is safety and impact on cyclists and pedestrians. <p>The applicant should demonstrate that all other potential routes from other roads have been assessed. For example, vehicles could stop on Mill Mead Road and use a trolley/ cargo bikes to transport deliveries through the park.</p> <p>If stopping on Ferry Lane is the only option, the applicant will need to provide a design for an off peak (say 10am-4pm only) loading box, and show how this incorporates the cycle lane. The would also need to make sure that unloading activity does not lead to bins and boxes blocking the use of the Ferry Lane footway or the ramp. Pedestrian footfall will increase along this route as a result of local growth.</p> <ul style="list-style-type: none"> • A draft CEMP has been produced for the proposals and it is welcomed that the scheme has outlined a commitment to using FORS silver and above accredited contractors. It is also welcomed that construction related deliveries will scheduled to avoid peak hours. 	
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	<p>An indicative figure for the number of daily vehicle movements associated with the construction should be provided.</p> <p>To support the Mayors Vision Zero objectives from October 26th 2020 all Heavy Goods Vehicles (HGV's) more than 12 tonnes entering or operating in Greater London will need to hold a valid HGV safety permit, granted if the vehicle meets the minimum Direct Vision Standard (DVS) star rating. TfL requests the applicant confirm that all HGV's in use at the site will meet the minimum DVS star rating.</p> <p>The scope for utilising river transport for waste removal and delivery of construction materials should be discussed further with Haringey Council given the site's proximity to the River Lee.</p> <p>Swept path analysis should be provided to demonstrate how the largest vehicles associated with the development enter and egress the proposed access point off Mill Mead Road.</p> <p>TfL note two routes onto Mill Mead Road are proposed. Given the location of cycle lanes along Ferry Lane, TfL's preference would be for construction vehicles to avoid left turns onto Mill mead Road and thus promote the route from the east.</p> <p>TfL recommends that construction operations are reviewed in accordance with national Site Operating Procedures issued in March 2020 by Government and that traffic marshalling and vehicle access arrangements are reviewed to enable pedestrians and cyclists to safely social distance, and take account of the Mayor's new Streetspace for London plan as details emerge.</p> <p>Contractors should promote walking and cycling to the site for all or part of their travel and shift working to reduce travel at peaks, as well as other national guidance. Consideration should be given to the supply of cycle parking, showers and lockers for construction workers to support sustainable travel to the site.</p>	
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	<p>Overall, based on the current servicing arrangement TfL object to the proposals. TfL also requires further information on cycle parking and construction logistics.</p> <p><u>Additional</u></p> <p>Both the servicing and waste strategies proposed are considered acceptable.</p> <p>In terms of the CEMP, it is welcomed that routing to the site will be solely from the east to avoid left turns across the cycle lane along Ferry Road into Mill Mead Road.</p> <p>Noted and welcomed that river transport options are being pursued further.</p> <p>Outstanding information:</p> <ul style="list-style-type: none"> - DVS compliant HGV use? - Indicative figure for number of construction vehicle trips to the site. - On site cycle parking provision for workers? <p>In term of site access, figure 8 shows swept paths and both the entrance and exit manoeuvres seem to show the 10m lorry oversailing the pavement. I assume this issue will be addressed through the temporary widening of the crossover?</p>	
Environment Agency	<p>Thank you for consulting us on the above planning application. Please accept my apologies for the late response and any inconvenience caused.</p> <p>Having reviewed the information submitted, the proposed development raises some concerns which we believe are reason to refuse planning permission. Specifically, the proposals are contrary to your Local Plan Policy DM28 on setting back development from a main river. Please see our commentary on this under 'Advice to LPA'.</p>	<p>Comments noted. Condition 2 is no longer required following further discussions.</p>

	<p>If you are minded to approve the proposal as it stands, it will only be acceptable if the following conditions are included on the planning permission decision notice. Without these conditions we would object to the proposal due to its adverse impact on the environment.</p> <p>Condition 1 No work on site shall take place until a detailed piling method statement and piling design, demonstrating that there will be no increased loading on the river wall during construction or from the final structure, has been submitted to and approved in writing by the local planning authority. Any piling must be undertaken in accordance with the terms of the approved piling method statement.</p> <p>Reason To ensure the structural integrity of the river wall will not be compromised and to prevent flood risk on site and elsewhere. This is in line with paragraph 163 of the National Planning Policy Framework (NPPF) and policy DM28 of the Haringey Development Management Development Plan Document (DPD).</p> <p>Condition 2 No work on site shall take place until a detailed design and method statement, which demonstrates the operation for the removable ramp and structural independence from the river wall, has been submitted to and approved in writing by the local planning authority.</p> <p>Reason To ensure the structural integrity of the river wall will not be compromised and to prevent flood risk on site and elsewhere. To ensure access to the flood wall is achievable for maintenance and repairs. This is in line with paragraph 163 of the NPPF and policy DM28 of the Haringey Development Management Development Plan Document (DPD).</p> <p>Condition 3 No development shall take place until a scheme for the provision and management of the buffer zone alongside the watercourse (as shown in Drawing: Boundary Sections, 1712_0225, Revision E) has been submitted to, and approved in writing by, the local planning authority. Thereafter, the development shall be carried out in accordance with the approved scheme. The buffer zone scheme shall be free from built</p>	<p>Other conditions shall be included.</p>
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	<p>development including lighting, domestic gardens and formal landscaping. The scheme shall include:</p> <ul style="list-style-type: none"> • plans showing the extent and layout of the buffer zone. • details of any proposed planting scheme (for example, native species). • details of any new habitat and enhancements created on site to align with Biodiversity Net Gain and site allocation TH9. • details demonstrating how the buffer zone will be protected during development and managed over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan. • details of any proposed footpaths, fencing, lighting, etc. • details of how the invasive species on site will be treated <p>Reason Land alongside watercourses is particularly valuable for wildlife and it is essential that this is protected. This approach is supported by paragraphs 170 and 175 of the NPPF which recognises that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.</p> <p>Development that encroaches on watercourses can have a potentially severe impact on their ecological value. Rivers and the associated riparian zone act as blue and green wildlife corridors, important for a wide range of protected species. Naturalised riparian zones or buffer zones also act as high biodiversity areas for a great range of flora and fauna. Within the footprint of this development there is existing natural vegetation that will be lost. The development will also cause the loss of a biodiversity refuge and potentially cause disturbance to animals commuting through this section of the watercourse.</p> <p>Flood Risk Activity Permit Informative The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:</p> <ul style="list-style-type: none"> • on or within 8 metres of a main river (16 metres if tidal) 	
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	<ul style="list-style-type: none"> • on or within 8 metres of a flood defence structure or culvert (16 metres if tidal) • on or within 16 metres of a sea defence <p>□ involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert</p> <ul style="list-style-type: none"> • in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission. <p>For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.</p> <p>Advice to LPA Development Setback</p> <p>The development is located in very close proximity to the Pymmes Brook, designated a main river. Drawing: Boundary Sections, 1712_0225, Revision E, shows a building setback between 1.9m and 2.2m from the Pymmes Brook, for the majority of the western boundary of the site. This is contrary to your Local Plan Policy DM28 which states that: A New development must be set back at a distance of 8 meters from a main river and 5 meters from an ordinary watercourse, or at an appropriate width as agreed by the Council and the Environment Agency, in order to provide an adequate undeveloped buffer zone. We therefore view this as a valid reason for refusal.</p> <p>However, we understand that this site is within the boundary of the Hale Wharf Site Allocation (TH9), as part of the Tottenham Hale Area Action Plan, and it is the ambition of the council that this site is developed as part a 'comprehensive proposal'. We also accept that this site is constrained given it is a narrow parcel of land located between two main rivers which impacts development options. That being said, we believe the proposals could do more to increase the setback from the Pymmes Brook than what is currently being proposed, and align the proposals with the development guidelines of the site allocation and also the ambition to create a comprehensive proposal.</p>	
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	<p>Outline approval was granted to the wider Hale Wharf development in 2017 (reference: HGY/2016/1719) and subsequent reserved matters have been approved. The Hale Wharf development is setting back development from its bounding main rivers by 3.8m and establishing this zone as a natural buffer with ecological enhancements which will be closed off to the public. These proposals are more closely aligned with the development guidelines of the site allocation. We would encourage you to consider if the current proposals for the Lock Keepers cottages are acceptable, or if more can be done to setback the development from the Pymmes Brook and enhance the blue ribbon network through Tottenham Hale. We would be happy to discuss this point further.</p> <p>Additional Information Flood Risk It appears that the reason the site is designated Flood Zone 2/3 is because it is within the historic outline from the 1947 flood event. In terms of the current risk the site is outside of all our modelled flood events and therefore could be classified Flood Zone 1. The FRA demonstrates that the site is safe in a flood event for both a 35% and 70% climate change allowance, therefore the application is considered acceptable from a flood risk perspective.</p> <p>If you have any queries please don't hesitate to contact me on the details below.</p>	
Natural England	<p>Apologies again for the delay in providing you a response.</p> <p>Lee Valley SPA- no objection</p> <p>With regards to Lee Valley SPA, it is good to see appropriate SUDS measures proposed alongside the application. The proposed green roof and controlled release of surface water from attenuation tanks etc. to approximately greenfield runoff rates should help ensure no increase in pollution or flood risk from surface water into adjacent watercourses that may be hydrologically linked to the Lee Valley SPA and its underpinning SSSIs, plus</p>	<p>Comments noted. Maintenance of SUDS will be secured by condition, as will biodiversity improvements. The site does</p>

	<p>the Walthamstow Marshes SSSI. The green roof will also have biodiversity benefits. Please ensure the provision of SUDS and in perpetuity maintenance are secured by condition.</p> <p>The only other concern with Lee Valley SPA might be the height of the building (6 storeys) due to the potential for birdstrike with the buildings. However, 6 storeys is not overly high and given the small scale nature of this application, we would not object on those grounds.</p> <p>Epping Forest SAC- no objection</p> <p>Protected Species With regards to protected species, Natural England has produced standing advice to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.</p> <p>Biodiversity Net Gain We have not reviewed the application with regards to biodiversity net gain. However please note is a requirement of all development to enhance the natural environment, as stated in the NPPF (2018 as amended), paragraphs 170(d), 174 and 175. Natural England recommend that an appropriate level of enhancement, such as the addition of bat boxes and/or bird boxes, are secured as part of this application.</p>	not affect the nearby SSSI or any other ecological designations.
Canal and River Trust	<p>We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring</p>	Comments are noted. CRT recommend a number of modifications to the

	<p>for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.</p> <p>The main issues relevant to the Trust as statutory consultee on this application are:</p> <ul style="list-style-type: none"> a) The impact on users of the River Lee Navigation towpath b) The impact on biodiversity of the River Lee Navigation corridor c) The impact on the structural integrity of the River Lee Navigation <p>Based on the information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended)) is to advise that suitably worded conditions are necessary to address these matters. Our advice and comments follow:</p> <p>The impact on users of the River Lee Navigation towpath</p> <p>The Trust considers that the scheme will have a positive impact on towpath users' perceptions of safety in this area by bringing a significantly greater sense of natural surveillance. The café should bring a welcome sense of activity to what will become an increasingly important access/egress point between the towpath and the highway network.</p> <p>The Trust welcomes the attempt to improve access down to the towpath from Ferry Lane for less mobile users. However, we question whether, based on the proposed frontage to Ferry Lane, the public lift will be visible and attractive to casual users, with the route to the lift entrance potentially obstructed by cycle parking. At towpath level, the interaction between people waiting for the lift, exiting it and people coming down the ramp will need careful consideration and management. It may be necessary to add a refuge to the entry/exit at towpath level. If this was to be necessary then it would need to be provided within the footprint of the proposed building rather than on the towpath, given the proximity of the access ramp. We suggest that, if possible, it may be better to move the lift further north within the development, away from the access ramp.</p>	<p>development which have all been considered adaptations made where possible. The lift will not open directly onto the towpath and the ramp to the west is needed for servicing. Balconies will be designed to prevent objections falling onto the towpath. Public realm improvements will be secured through on and off site landscaping, tree planting, wayfinding installations and biodiversity / ecology</p>
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	<p>We note that the developer proposes to take on the responsibility for managing and maintaining the lift to towpath level. The Council should not expect that the Trust will take on any maintenance or management responsibilities.</p> <p>By developing close to the bottom of the existing access ramp, the scheme is likely to preclude any improvements to this access in the future. We question whether more could be made of the service ramp to the west of the building, allowing this to provide accessible and cycle-friendly access to the towpath and the café. It may need to be wider to fulfil this role. However, this may provide a cheaper and more user-friendly solution than the lift, with fewer ambiguities over whether it is public/private or what types of users it is open to (cyclists for example).</p> <p>Whilst we welcome the inclusion of a café within the scheme, potential conflict between towpath users and café patrons will need to be carefully managed, including through good design. We suggest that building corners should be profiled to avoid abrupt corners, to allow a safe flow of people along the towpath. The public realm space around the café should be laid out to allow space for people to move along the towpath without obstructions from planting/chairs/tables. It may also be necessary to limit the opening of doors to the space to the north of the building or recessing them into the building with good visibility in both directions to allow people to emerge safely.</p> <p>The Trust will want to see the details of the proposed balconies to ensure that the design seeks to minimise the risk of objects falling from the balconies onto the towpath.</p> <p>We suggest that the development is highly likely to result in use of the towpath increasing, with more people visiting the café, commuting to the offices or new residents using the waterway corridor for recreation or commuting. We suggest that developer contributions, secured through CIL or planning obligations, should be put towards improving the under-bridge environment beneath Ferry Lane. We suggest that the surface beneath the bridge, which comprises square granite setts, should be smoothed in a manner that is sensitive to the historic character of the setts. Hiding corners that attract litter and anti-social behaviour should be removed. We would also like to see improvements to the ramp down</p>	<p>measures, as well as a financial contribution to the nearby Paddock. All other matters will be dealt with by appropriate conditions.</p>
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	<p>from Ferry Lane on the south side, some repairs to the towpath (which was surfaced for the London Olympics in 2012) and improved signage and wayfinding, given that the development may make the waterway less visible from Ferry Lane, when approaching from the west.</p> <p>The impact on biodiversity of the River Lee Navigation Corridor</p> <p>The Trust welcomes the intention to retain the trees to the north of the site and we have no objection to the removal of the remaining trees. However, in the interests of achieving a biodiversity net gain, which the NPPF (para 170) requires and the Environment Bill proposes to legislate for, we suggest that the council secures measures to improve on- and off-site habitats. We suggest that this should include filling gaps in the hedgerows adjacent to the canal in this area and working with the Trust (and partners such as the Stonebridge Coalition adoption group) to identify a suitable location for the installation of floating habitat within the River Lee Navigation.</p> <p>We suggest that bird & bat boxes and bug hotels should be included within the site.</p> <p>We suggest that further details of artificial external lighting should be required by condition. In the interests of the biodiversity of the River Lee Navigation corridor, particularly bats that use waterway corridors for foraging, lighting should be <5Lux, directional and warm white LEDs. Details of lighting, including a diagram displaying the expected ambient lighting spill and artificial external lighting in Lux units, should be required by condition.</p> <p>The impact on the structural integrity of the River Lee Navigation</p> <p>The lock adjacent to the proposed development was rebuilt in 1960 and the chamber wall is of a heavy duty concrete construction. The lock is currently out of use and the water level is held at the downstream (lower) level. The developer should satisfy itself that any works below the upstream (higher) water level would not result in water leaking from the lock structure into the development in the event that the lock was brought back into</p>	
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	<p>service. Whilst our assumption is that development below the water level is not proposed, the level of the plant room in relation to the lock is not clear from the submitted drawings.</p> <p>The Trust suggest that a risk assessment and method statement to assess and mitigate the risks of construction and demolition activities (such as vibration from piling) on waterway infrastructure, users and environment should be required by condition. In addition, the developer should review our Code of Practice for Works affecting the Canal & River Trust and ensure that the necessary consents are obtained.</p> <p>The Canal & River Trust as Landowner</p> <p>From the information available, we believe that at least one of the proposed balconies would oversail the Canal & River Trust s property. In addition, the proposed development will create new accesses on to the canal towpath. These items, along with any other uses of the Trust s property (including temporary use during development) will require the Trust s prior approval through a commercial agreement. Consent from Defra for the Trust to grant the required rights may also be required and should be factored in to the developer s plans for completing the development, if consented. These rights are not included in agreements relating to the Trust s sale of part of the site. The developer should contact Bernadette McNicholas (Bernadette.McNicholas@canalrivertrust.org.uk) regarding the necessary agreements.</p> <p>Planning Conditions, Obligations and Informatives</p> <p>Should planning permission be granted we request that the following conditions are applied:</p> <p>Balconies</p> <p>Prior to the first occupation of the development hereby permitted, full details of the appearance and materials of the balconies hereby permitted shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.</p>	
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	<p>Reason: In the interests of users of the Blue Ribbon Network and its visual amenity.</p> <p>Landscaping</p> <p>Prior to the first occupation of the development hereby permitted, full details of the proposed hard and soft landscaping and its management/maintenance shall be submitted to and approved in writing by the Local Planning Authority. The landscaping plan shall include on-site biodiversity enhancement measures. The landscaping shall be carried out, managed and maintained in accordance with the approved details.</p> <p>Reason: In the interests of visual amenity of the Blue Ribbon Network, its biodiversity and its users</p> <p>Lighting</p> <p>No external lighting related to development hereby permitted shall be installed unless it is in accordance with details which have previously been submitted to and approved in writing by the Local Planning Authority. Such details shall include location, height, type and direction of sources and intensity of illumination, demonstrated on a lux plan. Any lighting that is so installed shall not thereafter be altered.</p> <p>Reason: In the interests of the protection of the biodiversity of the Blue Ribbon Network .</p> <p>Risk Assessment and Method Statement</p> <p>Prior to the commencement of the development hereby permitted, a Risk Assessment and Method Statement shall be submitted to and approved in writing by the Local Planning Authority. The Risk Assessment and Method Statement shall identify risks to the stability of canal infrastructure, the waterway environment and the health, safety and enjoyment of canal users during demolition and construction phases. It shall demonstrate that such risks have been adequately avoided, mitigated or managed through the method statement. Once approved, development shall be carried out in accordance with the Risk Assessment and Method Statement.</p>	
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	<p>Reason: To ensure construction works do not have any adverse impact on the environment of the River Lee Navigation and its users. This condition seeks to prevent harm to the canal during the demolition and construction phases</p> <p>In addition, the Trust would welcome further discussions with the Council about the appropriate route for securing developer contributions (through CIL or s106) for local towpath and biodiversity enhancements, as identified above.</p> <p>Should planning permission be granted we request that the following informatives are appended to the decision notice:</p> <p>The applicant/developer is advised to review the Canal & River Trust's "Code of Practice for Works affecting the Canal & River Trust and contact the Trust's Works Engineer (steven.ellis@canalrivertrust.org.uk) in order to ensure that any necessary consents are obtained and that the works are compliant. (https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-our-propertyandour-code-ofpractice)".</p> <p>For us to monitor effectively our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.</p> <p>The applicant/developer is advised that any oversail, encroachment or access to the waterway requires written consent from the Canal & River Trust, and they should contact the Canal & River Trust regarding the required access agreement.</p>	
Lee Valley RPA	<p>I would be very interested to learn what is intended for the area immediately north of the café and how that could be secured as a public open space adjacent to the towpath.</p> <p>In advance I am sending you a extract from the report I am writing which sets out in draft the response that is likely to go up to Members; although it is officer level only at this stage. I will be discussing this further with colleagues shortly and I can of course revise if further detail is supplied by the applicants if you are able to pass this on?</p>	<p>These recommended measures have been taken on board. An indicative landscaping</p>

	<p>“Recommendation</p> <p>1) That the London Borough of Haringey be informed that whilst the Authority does not object to the principle of development proposed it has serious concerns about the lack of information in relation to, and seeks further detail regarding:</p> <p style="padding-left: 40px;">a) The landscape treatment of the development in relation to the Regional Park, namely the southern entrance to Tottenham Marshes which lies on the opposite side of the Pymmes Brook to the application site, the western waterside elevation overlooking Pymmes Brook, and land to the north of the application site, contiguous with the towpath that could provide an additional area of public open space of benefit to Park visitors</p> <p style="padding-left: 40px;">b) The ecological value of the site and adjoining waterways; further detailed survey work is required in order to assess the application for biodiversity impacts, particularly in relation to protected species; this should be a material consideration in this case</p> <p style="padding-left: 40px;">c) measures for habitat retention, enhancement, mitigation, and compensation, based on the findings of the ecological surveys to be incorporated within the proposed development</p> <p style="padding-left: 40px;">d) a lighting plan or strategy for the development both in operation and during the construction period, this should be informed by the ecological surveys and take particular account of the adjoining areas of the Regional Park and the habitats these contain</p> <p>2) That the London Borough of Haringey be informed that the Authority would wish to be consulted on this detail provided prior to any grant of consent</p> <p>3) That should the London Borough of Haringey be minded to approve the planning application then S 106 contributions should be sought for open space</p>	<p>plan has been provided for the land to the north, ecological protection measures and enhancements, and lighting arrangements will be secured by condition.</p>
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	<p>enhancements and habitat creation within the Regional Park to cater for the recreational needs of the new residents and to mitigate for habitat loss and disturbance along the waterway corridor in accordance with the findings of the ecological surveys and as specified in the schedule attached</p> <p>4) In addition, efforts should be made to secure, via conditions or planning obligations, the area immediately north of the application site as an area of public open space forming part of the towpath and to implement a comprehensive landscape and access plan in association with the new footbridge landing.</p> <p>Please email if you have any queries and also if you receive any updates from the applicant that you consider relevant to the points above. We may need a separate discussion about S106 matters.</p>	
Historic England (GLAAS)	<p>Recommend Pre-Determination Archaeological Assessment/Evaluation</p> <p>Thank you for your consultation received on 15 April 2020.</p> <p>The Greater London Archaeological Advisory Service (GLAAS) give advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.</p> <p>NPPF Section 16 and the London Plan (2017 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. A field evaluation may also be necessary.</p>	<p>The additional comments are noted and were provided following additional information provided by the applicant. These matters regarding archaeology will be secured by condition.</p>

	<p>I have looked at this proposal and at the Greater London Historic Environment Record but I need more information before I can advise you on the effects on archaeological interest and their implications for the planning decision. If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.</p> <p>The planning application lies in an area of archaeological interest.</p> <p>Recent work at the neighbouring Hale Wharf site (not yet on the GLHER) by Pre-Construct Archaeology excavated well-preserved remains of the seventeenth and eighteenth century milling on the Lea as well as earlier palaeoenvironmental evidence including Saxon period peat. Similar remains, of milling on the Pymmes Brook, as well as other riverside activity may be affected by the proposals. As a basement is proposed, there may not be scope for preservation in situ of important remains under a consented scheme.</p> <p>Because of this, I advise the applicant completes these studies to inform the application:</p> <p>I will need to agree the work beforehand and it should be carried out by an archaeological practice appointed by the applicant. The report on the work must set out the significance of the site and the impact of the proposed development. I will read the report and then advise you on the planning application.</p> <p>The planning application lies in an area of archaeological interest.</p> <p>Evaluation</p> <p>An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally</p>	
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	<p>include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.</p> <p>I will need to agree the work beforehand and it should be carried out by an archaeological practice appointed by the applicant. The report on the work must set out the significance of the site and the impact of the proposed development. I will read the report and then advise you on the planning application.</p> <p>NPPF paragraphs 193 - 194 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non- designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 197). Conservation can mean design changes to preserve remains where they are.</p> <p>NPPF paragraphs 185 and 192 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement opportunities.</p> <p>If preservation is not achievable then if you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms.</p> <p>You can find more information on archaeology and planning in Greater London on our website.</p> <p>This response only relates to archaeology. You should also consult Historic England's Development Advice team on statutory matters.</p> <p>Additional Comments</p>	
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	<p>GLAAS advise that the risk at the site is that policy-compliant management of well-preserved buried remains of a mediaeval mill (ones that would merit conservation as an designated archaeological heritage asset of national importance in NPPF terms) would not be compatible with a scheme with a basement. Well preserved remains would be likely found if the site had undergone past waterlogging, permitting timbers and other organic material to survive. Historical records show that milling on the site took place from at least the 13th century and given the recently uncovered Saxon settlement remains at Ferry Island recently, very possibly earlier.</p> <p>Unfortunately there is no ground survey information, including geotechnical data, submitted with the desk-based archaeological assessment to help inform on the presence of waterlogging here.</p> <p>We have gone back to the records of the excavation of Hale Wharf scheme next door. Those results did not indicate high levels of organic preservation. On this basis, we advise that the risk of well-preserved remains at the current site *may* be the same as at Hale Wharf. It goes without saying that working with this point is not without risk and that the hydrology on the west side of the Lea Navigation may well be very different from the hydrology on the east side where Hale Wharf stands.</p> <p>I should say that if significant, well preserved remains are present, then the appropriate level of archaeological work to investigate, record and interpret them will likely be time-consuming and expensive.</p> <p>The resulting destruction of archaeological remains by development impact would also warrant the developer following the NPPF's advice on including proposals for leveraging affected heritage assets to improve local character and distinctiveness, to contribute to sustainable communities including their economic vitality, and to enhance the significance and public understanding of the assets.</p>	
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	<p>With the above risks in mind, should the LPA be minded to grant this application, it should only do so with the following two (2) conditions in place on a consent:</p> <p>CONDITION 1 :</p> <p>No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</p> <p>If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p> <p>A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</p> <p>B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.</p> <p>Informative: Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London</p>	
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	<p>AND CONDITION 2:</p> <p>Condition: The development will not be occupied until applicant has secured the implementation of a scheme of public heritage display, interpretation and outreach which considers industrial heritage, connections with nearby historical sites and archaeological evidence. This shall be undertaken in accordance with written details submitted by the applicant and approved in advance by the local planning authority.</p> <p>Reason The planning authority wishes to secure the provision of historic interpretation and related public benefit from the heritage of the site, including from its mediaeval milling past, and from its connections with contemporary sites, as well as from remains found in archaeological work at the site.</p>		
London Borough of Waltham Forest	<p>I refer to your consultation under Article 16/17 of the Development Management Procedure (England) Order 2010 and this Council has the following views to make:</p> <p>The CEMP only contains details of the route and there is no information on vehicle numbers and sizes. There is an LBWF bridge with a weight limit on the proposed route, which would be passing several other construction sites and we therefore request to be consulted on the CLP when submitted.</p> <p>We trust that you will take the above into account when determining this application and I look forward to receiving a copy of the decision notice.</p>		<p>Comments noted. LBWF will be consulted as per the wording of the appropriate condition.</p>
LOCAL REPRESENTATIONS:	<p>Land Use and Housing</p> <ul style="list-style-type: none"> • Café use is not required in this area 	<ul style="list-style-type: none"> • This would be the only café unit in the area to directly provide refreshments to users of the towpath 	

<p>LETTERS FROM 38 INDIVIDUAL ADDRESSES</p> <p>36 IN OBJECTION</p> <p>2 COMMENTS</p>	<ul style="list-style-type: none"> • Lack of affordable housing • Loss of existing residential accommodation 	<ul style="list-style-type: none"> • Affordable housing provision is not financially viable for this development. This has been independently tested. • The existing dwellings are ageing and are now out of keeping with the developing surrounding area. This plot has been identified for employment-led regeneration as part of Site Allocation TH9 and therefore the loss of two dwellings is acceptable.
	<p>Size, Scale and Design</p> <ul style="list-style-type: none"> • Excessive height and scale • Poor design • Overdevelopment of the site and local area 	<ul style="list-style-type: none"> • The height and scale of the building provides an appropriate transition between the much larger Hale Village and Hale Wharf developments. • The design of the development has undergone several reviews, including by the Quality Review Panel, Pre-Application Committee and by the Council's Design Officers, amongst others. It is considered that the design is now of a high-quality, and is appropriate for the site, and can be accepted. • The Council is required by policy to support the optimisation of new developments. The proposal makes the most of the space within the site but does not constitute

	<ul style="list-style-type: none"> • Out of keeping with surrounding area • Negative impact on local character • Loss of historic character • Loss of openness on this plot • Impact on local and strategic protected views 	<p>overdevelopment, particularly given the size and scale of neighbouring developments.</p> <ul style="list-style-type: none"> • The detailed design would be unique within the local area, but the location and constraints of the site allow for this. The building would be finished in high-quality contemporary materials, and this will be secured by condition. • The local character to the east and west is one of high-quality contemporary developments of scale and this proposal accords with that character. • The existing properties are of no particular architectural merit and there are no heritage assets nearby that are listed or locally listed. Therefore, local heritage would be respected. • The plot already contains dwellings and boundary fencing and is therefore not particularly 'open'. Although some airspace above these dwellings would be lost this would be mitigated by the open air above the adjacent waterways. • The site is not a tall building (not ten storeys or greater in height) and therefore would not impact significantly on any local views.
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	<p>Parking, Transport and Highways</p> <ul style="list-style-type: none"> • Disruption from construction traffic and works • Increased local traffic • Lack of parking provision • Overcrowding of public transport • Inappropriate delivery/servicing arrangements • Inappropriate emergency access arrangements 	<ul style="list-style-type: none"> • Construction works would be carefully controlled through a construction management plan and a contribution will be provided towards a dedicated officer, who will manage construction and other works within the Tottenham Hale area. • This development would be car free, aside from a single wheelchair-accessible parking space. Therefore, traffic increases from the development would not be significant. • Car free development is supported in this area due to the excellent local transport connections. • There is capacity available on local public transport networks. • Delivery and servicing arrangements have been considered acceptable by Transport for London. • The Council's Emergency Planning team considers the emergency access acceptable
	<p>Residential Amenity</p> <ul style="list-style-type: none"> • Excessive overshadowing 	<ul style="list-style-type: none"> • The development would not overshadow residential properties to any significant extent

	<ul style="list-style-type: none"> • Loss of privacy • Loss of day/sunlight • Increased noise disturbance • Excessive disturbance from construction works • Lack of local amenities • Lack of fire safety 	<ul style="list-style-type: none"> • The development would be located at least 30 metres from any other residential property which is sufficient to prevent any significant impact on privacy. For the same reason, daylight and sunlight to neighbouring properties would not be affected. • The development would not provide significantly noise creating uses. • Disturbance from construction works are a temporary nuisance and are controlled by environmental health legislation. • There are numerous local amenities nearby including shops, restaurants, cafes and parks/open spaces. • Sprinklers are included within this development. Fire safety has been deemed suitable by the London Fire Brigade.
	<p>Environment and Public Heath</p> <ul style="list-style-type: none"> • Loss of open and green space • Loss of trees 	<ul style="list-style-type: none"> • The application site is not formally designated open space, and although it contains some green areas these are mostly private gardens. A contribution to the Paddock and green roofs/walls would mitigate for the loss of green planted areas. • The highest quality 'Willow' tree would be retained. Category B and C trees lost would

	<ul style="list-style-type: none"> • Negative impact on Lee Valley Regional Park, wetlands, river towpath and canal • Negative impact on ecology and biodiversity • Lack of public realm improvements 	<p>be replaced on street. This is secured by condition.</p> <ul style="list-style-type: none"> • The LVRPA raise no objections to this development subject to landscaping and ecology conditions. The towpath and canal would also be unaffected. The protected areas of the wetlands are too far away from this site to be affected by a development of this relatively modest scale. • Ecological and biodiversity improvements would be secured by conditions. • The public realm would be improved through greater surveillance from a high quality contemporary development that is occupied over 24 hours and provides new lighting and step-free access onto the towpath. New landscaping and tree planting is proposed in public areas. A contribution towards improvements to the Paddock is also provided by legal agreement.
	<p>Other</p> <ul style="list-style-type: none"> • Negative impact on local archaeology 	<ul style="list-style-type: none"> • Further archaeological surveys will take place prior to development taking place and any significant finds will be displayed publicly.