Appendix 4: Internal and External Consultee Representations

Stakeholder	Comment	Response
INTERNAL		
Carbon Management	Energy – Overall. The overall predicted reduction in CO_2 emissions for the development, from the Baseline development model (which is Part L 2013 compliant), shows an improvement of approximately 74.8% in carbon emissions with SAP10 carbon factors. This represents an annual saving of approximately 8.33 tonnes of CO2 from a baseline of 10.46 tCO2/year. A total carbon shortfall of 3.38 tCO_2/year remains. The carbon offset contribution would therefore be around £9,633 subject to detailed design and confirmation of the measures below. Energy – Lean. The applicant has proposed an improvement of beyond Building Regulations by 15.14% through improved energy efficiency standards for the entire development. It is not clear how the different elements of the build perform against the minimum 10% and 15% reduction set in Policy SI2 in the Intended to Publish London Plan for residential and non-residential elements respectively, so this is not supported. Phenolic foam is proposed as an insulation material. This is a synthetic material, based on plastic foam, which is not considered acceptable. The applicant needs to review natural, breathable insulation materials which are recommended by Historic England for the use in listed buildings and extensions to listed buildings. Furthermore, this material should also be used in the new build to ensure the building performs better in terms of moisture buffering properties, indoor air quality and embodied carbon. Energy – Clean. The applicant is proposing to make it possible to connect the site to a DEN in the future. The site is within the Tottenham North DEN connection area and must therefore make these provisions. The plant room is situated in the middle of the site, which would make future connection more difficult. Pipework to the edge of the site, with a connection point and HIU. No energy reductions have been proposed based on connecting to the DEN. Energy – Green. The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total saving of regulated emissions would be 74.80%. The solar PV array peak output would be 6.93 kWp (21 panels), which is estimated to produce around 5,985 kWh of renewable electricity per year. This would represent a carbon saving of 3.11 tCO_2/year.	The recommended conditions address the comments, including the need for an updated energy strategy, overheating, MVHR and BREEAM accreditation. Recommended s106 planning obligations to facilitated connection to a future DEN.

Stakeholder	Comment	Response
	The proposed ASHPs with a COP of 4.6 (heating) and 6.7 (cooling) will individually provide hot water and heating to the dwellings and commercial units. This seems high. It is not clear what the carbon reduction saving would be for ASHPs. Be Seen. The applicant will be required to sign up to the GLA's Energy Monitoring platform once this has been opened. Overheating. An overheating assessment has been done in line with CIBSE TM52 and TM59 (dated February 2020). Further detail is required to demonstrate it is policy compliant. Sustainability. No BREEAM Pre-Assessment has been undertaken for the commercial element of the scheme. The applicant is aiming for 'Excellent' but has stated that it currently only achieves a 'Very Good' rating. Some explanation is provided but without a Pre-Assessment it cannot be determined whether this is policy compliant **Updated comments** It was not clear from the previous energy report that the existing building was not being retained, as was previously discussed during the pre-application stage. Therefore, many of the comments above are not applicable. **Carbon Factor** The applicant has used SAP10 carbon factors. However, for applications connecting to the DEN should be using SAP2012 carbon factors. This will therefore impact the % reduction under Be Lean requirements and the carbon offset contribution that would be due under the deferred contribution approach. **Interim heating strategy** For applications connecting to the DEN, we do not accept air source heat pumps as an interim heating technology. Proposing ASHPs undermines the viability for connection for all other sites and the connection to the Energy from Waste heat source. The acceptable interim solution is the installation of gas boilers. The scheme could be future proofed by installing ASHPs in the future if the site does not connect to the DEN. A revised Energy Strategy will need to be submitted to revise its interim heating strategy. It would be preferable for this to be submitted prior to determination, but the detailed revised strategy can also be submitted prior to commencement of development through planning conditions/s106 obligations. **Overheating**	

Stakeholder	Comment	Response
	The applicant submitted an Overheating Assessment (dated August 2020) by eb7, this has been done in line with CIBSE TM59. Design parameters include openable windows to 25°, fully openable glazed doors fully openable and a g-value 0.3. The results demonstrate: - All habitable rooms meet DSY1 criteria 1 and 2 in the 2020s weather file, which is policy compliant. - Under DSY2. Flat 8 living/dining room (L/D) fails. - Under DSY3, the following rooms failed: Flat 1 both double bedrooms and L/D, Flat 3 double bedroom and L/D, Flat 4 double bedroom and L/D, Flat 6 double bedroom and Flat 8 L/D. - Under the 2050s weather file, the L/Ds of Flats 1, 3, 4, 7 and 8 fail, and the bedroom for Flat 4. Under the 2080s weather file, all habitable rooms significantly exceed the criteria. The report sets out that retrofit options include: sun control window film to reduce solar gains by a further 50%, providing residents with a user guide, internal blinds (white backing). Although it is not mandatory to comply with DSY2 and 3, they could be significant indicators of future heat waves. The proposed flats should be further mitigated against under DSY 2 and 2 as far as possible within the proposed development. A planning condition has been recommended below to secure further potential mitigation measures. **Sustainability** The BREEAM Accredited Professional Stage 2 – Concept Design report by EB7 (dated 11 August 2020) demonstrates that schemes intends to achieve BREEAM 'Excellent'. It sets out a score of 72.41 for the retail unit, with a further potential of 6.85 credits. This is strongly supported. **Planning conditions** *<u>Energy Plan</u>* *(a) Prior to the commencement of development, an updated Energy Assessment should be submitted to the Local Planning Authority for approval. This should demonstrate that the development will connect to the Decentralised Energy Network (DEN) at North Tottenham, with an interim gas boiler heating solution and SAP2012 carbon factors. This report shall also set out the calculated deferred carbon offset contribution and plans showing how the development will be future proofed in case it does not connect to the DEN.* *(b) Prior to the commencement of development, the following details must be submitted to demonstrate the scheme has made sufficient provisions to connect to the North Tottenham DEN:* • *A plan to show the required layout of infrastructure (including conduit space, pipes and plant room) to connect to the future DEN;*	

Stakeholder	Comment	Response
	• *Set out detailed design of the heat network and how this complies with CIBSE CoP1 and the LBH Generic Specification. This should include detail of pipe routes and lengths, pipe sizes (taking account of F&R temperatures and diversification) and insulation to determine heat loss from the pipes in W/dwelling in order to demonstrate losses have been minimised;* • *Buried pipe (dry and filled with nitrogen) to LBH's approved specification from the ground floor plant room to a manhole at the boundary of their site and evidence of any obstructions in highway adjacent to connection point;* • *A clear plan for Quality Assurance of the network post-design approval through to operation, based on CP1;* • *A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set;* • *Determine how the offsets will be split between 'initial offset' (100% of which to be paid on commencement) and 'deferred offset'.* *(c) Prior to occupation, evidence shall be submitted that the proposed solar photovoltaic array of at least 6.93 kWp and associated monitoring equipment has been installed correctly. The solar PV array shall be maintained and cleaned at least annually thereafter.* *(d) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.* ***Reason**: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2016 Policy 5.2, draft New London Plan (Intend to Publish) Policy SI2 and Local Plan Policy SP4.* *<u>Overheating</u>* *(a) Prior to the commencement of development, evidence shall be submitted to demonstrate how the detailed design stage has explored and implemented further mitigation measures, where feasible, to reduce the risk of overheating for the development under Design Summer Years 2 and 3 for London under TM59. The submission should also outline who will own the risk of overheating and what the home user guide for future residents will include.* *(b) The development shall be built in accordance with the Overheating Assessment (dated August 2020) by eb7 and any further necessary mitigation measures identified in point (a).* ***Reason**: To enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with Policy 5.9 of the London Plan, Draft Policy SI4 of the draft New London Plan, and Policies SP4 and DM21 of the Local Plan.*	

Stakeholder	Comment	Response
	<u>MVHR</u> *Prior to installation, details of the Mechanical Ventilation and Heat Recovery (MVHR) systems shall be submitted to the Local Planning Authority. Details should include the efficiency, location of the units to ensure easy access for servicing, plans showing the rigid ducting.* ***Reason**: To ensure the new homes are adequately ventilated as required by London Plan Policy 5.9.* *<u>Living Roofs</u>* *(a) No development shall commence above ground floor until details of Living Roof have been submitted to and approved in writing by the Local Planning Authority.* *These details shall include:* *i) A roof plan identifying where the living roof will be located and what surface area it will cover;* *ii) Sections demonstrating substrate of no less than 250mm for the intensive living roofs;* *ii) Plans showing the inclusion of biodiversity measures for the living roof, such as details of diversity of substrate depths and types across the roof to provide contours of substrate to provide a variation in habitat, or details of log piles / flat stones for invertebrates;* *iv) Details on the range of native species of planting and herbs planted to benefit native wildlife;* *v) Irrigation, management and maintenance arrangements.* *(b) The approved living roof shall be provided before the buildings are first occupied and shall be managed thereafter in accordance with the approved management arrangements.* ***Reason**: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with regional policies 5.3, 5.9 and 5.11 of the London Plan (2016) and Policy SP4, SP5, SP11 and SP13 of the Haringey Local Plan (2017).* *<u>BREEAM Accreditation</u>* *(a) Prior to commencement on site, a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM 'Excellent' outcome (or equivalent).* *(b) The retail/commercial units shall be not be occupied (Use Class A1/B1 or D1) until a final Certificate has been issued certifying that a BREEAM (or any such equivalent national measure of sustainable building which replaces that scheme) rating of 'Excellent' for that unit has been achieved. The Accreditation of 'Excellent' shall be maintained thereafter unless otherwise agreed in writing with the Local Planning Authority.* ***Reason**: To ensure sustainable development in accordance with London Plan 2016 Polices 5.1, 5.2, 5.3 and 5.9 and Local Plan Policy SP4.*	

Stakeholder	Comment	Response
Conservation Officer	The proposed scheme would replace an undesignated building dating from the late 1940s and would infill its back land, thus seizing the opportunity to improve the quality of the conservation area through good design and a better use of its spaces. The existing building forms part of the historic frontage of North Tottenham Conservation Area, here characterised by a number of locally listed buildings immediately flanking the development site, but No 807 is deemed to be a much altered and bland Victorian pastiche whose material qualities have contributed to its inoffensive insertion within the historic frontage of the conservation area. However, this is one of the most heritage-sensitive stretches of the Conservation Area, being just opposite the highly significant Georgian townhouses of Northumberland Terrace and being characterised by a high concentration of listed and locally listed buildings and there is an opportunity to unveil its qualities and to declutter its back land through well- designed buildings and spaces. The proposed scheme stems from a careful analysis of the context and extensive discussion with the council and in its finalised iteration appears very respectful of its adjacent buildings, clearly influenced by the Georgian architecture of the most important buildings in the area and seems also very consistent with its wider context and relevant building by providing a well-proportioned contemporary reinterpretation of a classical townhouse characterised by symmetry, well-detailed windows and an elegant shopfront to ground floor. The development to the rear is more markedly contemporary and includes a well-integrated landscape design which helps maximizing the quality of the constrained land to the rear of No 807. Detailed design to include façade treatment, windows detailing and materials, especially in relation to the building fronting the High Road are fundamental to ensure a seamless insertion of the new buildings within the existing townscape. The proposed development is fully supported from conservation grounds and detailed design covering both buildings and landscape should be approved by the local authority.	The recommended conditions would enable officers to scrutinise detailed design and external material choices.
Design Officer	The proposals are well designed and promise to be a polite insertion into the Conservation Area and High Road frontage, including an active frontage through a well-designed shopfront, to the High Road and appropriate more private frontage to the Percival Court mews street. Above there will be decent quality residential accommodation, in a mix of smaller flat sizes appropriate to this high street and back of high street location, with a good podium level private amenity area, as well as private balconies to all flats and good outlooks and privacy. Conditions should ensure high quality brickwork and roof covering as well as sound detailing to the shopfront, windows (especially cills and lintels), parapet and gable.	Noted. Discussed in body of the report.
Drainage	The site is in CDA _61, the majority of the proposed development is in Flood Zone 1, which has a low risk of flooding, however, there is a small area that borders Flood Zone 2, which has a medium risk of flooding, with flood water level potentially reaching 0.4 to 1.0m. this would affect the non-residential	Noted

Stakeholder	Comment	Response
	parts of the proposed development. The applicant has mitigated the risk by proposing to raise sockets above the flood level as mentioned. The site offers few opportunities to have SuDS, solutions towards the top of the hierarchy due to the space that's available. The chosen SuDS, will include Blue roofs, attenuation tank, rain water butts on the podium level so the rain water can be re-used and the possibility of the inclusion of green roofs that would contribute to biodiversity and a treatment to improve the water quality, so there is a good balance of SuDS features and the site is being maximised for the space available. The proposed drainage strategy will achieve a betterment of approximately 77% on the existing drainage, with the run off rate close to green field rate, the drainage system will be gravity fed and will discharge to the public sewer subject to agreement with Thames Water, at the time of reviewing the strategy the applicant was waiting for Thames Water, to respond. A management maintenance plan has been provided within the strategy that will be in place for the lifetime of the development, the system will be maintained by a private company to ensure the system is maintained and functions effectively. The Haringey, pro-forma hasn't been provided this will need to be completed and returned to the LLFA, for review, this shouldn't delay the progress of the application. Based on the flood risk assessment and the drainage strategy that is being proposed the LLFA, can accept the strategy in principle.	
Economic Development	We have no adverse comments to make. We note the redevelopment would have 215sqm of non-residential space, and are generally supportive of this application.	Noted.
Pollution	No objection to the proposed development in relation to air quality and land contamination, subject to conditions and an informative addressing the following: Land Contamination, Unexpected Contamination, Non-Road Mobile Machinery, Combustion and Energy Plan, Demolition/Construction Environmental Management Plan and Asbestos Survey (informative)	The recommended planning conditions and informatives pick up on these issues.
Public Health	Housing quality and design. Public Health is pleased to see the design will be fitted with appropriate security measures (such as CCTV and secure access) and will create safe living conditions for our residents.	Noted.

Stakeholder	Comment	Response
	We note the accessible unit (Flat 8) is located on the third floor, which is the top floor of a four-storey building. The size of Flat 8 is 66.17 m2 and there is limited access to private amenity space compared to other flats. There could be an issue of safety and accessibility for the vulnerable to enter and leave the building. We are aware there is a lift and it can be frustrating for wheelchair users if this is broken down. As stated in the fire safety plans: “Disabled persons can access the First Floor using the lift, therefore there should be a disabled refuge in the stair. It should measure 900mm x 1400mm and not impede on the flow of persons escaping. A disabled refuge and lobby have been provided.” There is a disabled refuge in the stairs provided as well as lift to access the first floor. For accessibility and safety reasons we suggest the accessible unit in Flat 8 to substituted with Flat 2 located on first floor with a floor space of 65.15m2, approx 1.02m2 difference and with more private amenity space, in order to protect the vulnerable and enhance their mental health and wellbeing. Key things we would like to ensure: • The development build is Disability Discrimination Act (DDA) compliant • The community outdoor space is dementia friendly. A checklist of recommendations for designing dementia-friendly outdoor environments Neighbourhoods for life. <u>Air quality, noise and neighbourhood amenity</u>. Public Health were happy to see there is a shared green space proposed in this development and the resident unit as well as commercial units have their own amenity space. Key things we would like to see: • Due to the close proximity to the existing residents we would like to ensure there is a stringent construction management plan are attached to lessen construction impacts, particularly dust, noise levels and including the hours of working. • The Community Liaison Manager builds a strong relationship with local businesses and residents prior to the demolition and they feel confident to contact the manager. Also, to ensure there is a feedback and complaint procedure in place for residents and businesses open after working hours. <u>Accessibility and active travel</u>. We are pleased to see sufficient bicycle storage being proposed for 20 bicycles. We are reserved in our view of a shared cycling parking with residents and	

Stakeholder	Comment	Response
	businesses. We believe this needs further discussion. As this will be a shared space for residents and commercial users and located at the back corner of the ground floor, we need to ensure safety measures are in place and residents feel safe to use the cycle storage. Key points we would like to see: • Consideration of 'secured by design' principles should help to inform the design of the cycle storage. • Details on the design of the secure cycle storage/parking spaces including the lighting used and safety measures (in line with 2016 London Cycle Design Standard, Haringey Transport Strategy) • Easy access to the cycle storage; single semi-transparent door and light sensors. Layout of the cycle racks. Safe and well-lit walking routes and keeping entrances in open sight lines (avoid entrances located at the back of the building) • Promote cycling and walking by connecting routes to wider networks Climate change. Public Health were pleased to see an increase in planting on-site within the resident's amenity deck, which will also improve the Site's biodiversity value, satisfying the London Plan. Key point we would like to ensure: • The design proposal ensures that new housing and public realm can adapt to changes in temperature Summary. Overall, this is potentially a good development with open space and private amenity space for the occupants. Shared cycle space should be reviewed with planning for safeguarding. No room measurements limit our response.	
Transportation	Access Arrangements. The site is located to the western side of the High Road, and there will be level access for visitors from there and also via Percival Court to the side (northern) of the building. This is not public highway and is privately owned and appears to be an access shared with other adjacent properties. Percival Court can accommodate pedestrians, cyclists and vehicles. Commercial floor space access is proposed off the High Street, and residential off both the High Street and Percival Court. It is also proposed for a gated entrance to be provided to the northern side of the site off Percival Court, to enable access to a single blue badge parking bay.	The recommended planning conditions and informatives pick up on these issues.

Stakeholder	Comment	Response
	Swept path plots have now been provided by the applicant that detail the manoeuvres made to enter and leave by both hearses accessing the yard space at the rear off Percival Court, and also for a car parking in the on-site blue badge parking space. These appear satisfactory although they do not appear to have a 300mm safety buffer shown (this should be clarified and resubmitted of not the case). Also, the commercial floor space visitor cycle parking does look very close to one of the parked hearses. This needs to be revisited to display the dimensions of the yard and parking area, and also to show how close manoeuvring hearses get to parked cycles in the adjacent Sheffield Stands, and whether doors can be opened with impeding the ability to park cycles or vice versa. This can be covered by condition for review and approval prior to commencement of the development, to ensure that the proposed arrangements are workable and do not compromise the ability of visits to easily park cycles or vehicles. There are also swept path plots provided for a hearse entering and leaving Percival Court. It is noted that the hearse would need to sweep out to lane 2 to make the manoeuvre, this is likely to be similar to a longer wheelbase van or similar making the same manoeuvre. The TA references this manoeuvre only being made off peak, however that does not sound realistic or practical as these vehicles could be required to access or leave the premises at any time. In any situation, similar to a longer wheelbase vehicle, any hearse accessing the site via Percival Court will need to take the appropriate caution and opportunity to access Percival Court. It is noted that 3/5 tonne Luton Vans access the site at present and these are slightly larger than hearses. <u>Parking</u>. There is a single blue badge parking bay which is proposed for the commercial component of the development. Otherwise, the development is proposed as a car free development with respect to the residential component, and it is also proposed as a permit free development. Overall, it will be appropriate for the residential units proposed to be car free/permit free, with the applicant entering into the appropriate Planning Agreement to cover this and to meet the Council's Costs £4000). This can be covered by the S106. <u>Cycle Parking</u>. The TA includes a table detailing the cycle parking required to meet the requirements of the London Plan.	

Stakeholder	Comment	Response

Use & Floorspace (GEA)	London Plan Minimum Standard	London Plan Requirement	Proposed No. of Spaces
Residential (long stay) (9 units)	1.5 spaces/1b2p unit 2 spaces/all other	15.5	**16**
Residential (short stay) (9 units)	5-40 dwellings, 2 spaces	2 spaces	**2**
A1 (long stay) (155.3sqm)	1 space per 250sqm	0.6 spaces	**1**
A1 (short stay) (155.3sqm)	1 space per 125sqm	1.2 spaces	**1**
B1/D1 (long stay) (87.8sqm)	1 space per 150sqm, 0.6, min 2	2 spaces	**2**
B1/D1 (short stay) (87.8sqm)	1 space per 500sqm, 0.2 min 2	2 spaces	**2**
Total			**24**

Table 4.1 Cycle Parking Allocations

To meet forthcoming London Plan requirements, 16 long stay cycle parking spaces and 2 No. short stay visitor spaces are required for the residential units, and a total of 6 short/long stay spaces for the commercial floor space.

An internal cycle parking store is proposed to the back of the ground floor area, accessible from both cores. This will be able to accommodate 20 cycles, and includes provision for 5% of the cycles to be larger cycles.

Ideally there should be physical separation between the long stay residential cycle parking and commercial cycle parking, they should be in separate areas/containers/stores for security purposes.

For the commercial cycle parking, both long stay and short stay (4 spaces for each) are proposed for location within the service yard area, the long stay within a cycle parking store, and short stay on two Sheffield Stands. The numerical provision is correct to meet the requirements of the London Plan, and separation between the residential and commercial cycle parking is now provided so in principle this will be acceptable.

We will require sight of scaled drawings showing and confirming the store dimensions and the manufacturer's installation specifications for the cycle parking to ensure the proposed

Stakeholder	Comment	Response
	arrangements will be easily useable and attractive to residents and employees/visitors. This can be covered by a pre commencement condition. Deliveries and servicing. There is a loading pad provided within the footway very close to the site, allowing 40-minute loading between 0700- 2030. The absolute demands arising from the development are likely to be small in terms of total numbers of movements for both the residential and commercial uses. It is expected that the loading pad on the high road will be utilised most of the time foe visiting service vehicles and some service vehicles (of appropriate size) may take the opportunity to access Percival Court. Refuse and Recycling collection arrangements. The TA intimates refuse and recycling collections will be made from the street which is expected. The Council's Waste Team has indicated a 'flats above shops' type service will be required with waste and recycling left for collection from The High Road. Ultimately the proposed arrangements will need to accord with the Council's Waste and recycling collection team. Construction Phase. Given the site's location in a busy High Road, with a restricted access, close to a loading bay and adjacent to other commercial and residential neighbours, it will be necessary for a detailed draft of a Construction Logistics Plan to be submitted for review and approval prior to commencement of the physical works for the development. This document will need to fully detail how it is intended to build out the development, and what measures will be utilised to manage the build out to minimise and mitigate any potential impacts on the safe and smooth operation of the public highway, and on adjacent neighbours. In particular details of how materials will be moved into and out of the site and how the free and safe flow of pedestrians, cyclists and motor vehicles will be maintained. The CLP can be covered by condition. Summary. Given the very good accessibility to public transport services and local shops, it will be appropriate for it to be a car free/permit free development, apart from the provision of a blue badge bay for the accessible residential unit, so the applicant will need to enter into the appropriate planning agreement and meet the Council's costs (£4,000). Clarification of the proposed arrangements for cycle parking and waste/recycling collections will also be required, this can be covered by pre-commencement condition.	

Stakeholder	Comment	Response
	Finally, given the site's location, it will be appropriate for a detailed CLP to be submitted for review and approval prior to commencement of the construction work for the development. Overall, subject to satisfactory receipt and review of conditions relating to the cycle parking and waste/recycling collection arrangements, plus a Construction Logistics Plan, Transportation do not object to this application.	
Tree Officer	The tree is of limited value, having been subject to poor management previously. If the tree was retained and permission was granted for the new development, it would require pruning on an annual basis. In my opinion, it would be more appropriate to remove it and plant a more suitable species further away from the wall. Although I am unsure how you would get the tree owner to agree to this, would the developer fund the removal and replacement tree?	Addressed in report and recommended conditions.
Waste	• It is not possible for a waste collection vehicle to enter and exit Percival Court using forward motion gears. • Waste collection vehicle cannot stop at entrance of Percival Court due to traffic lights (they would need to stop outside No. 803 High Road) • It is not possible for waste receptacles should be within 10 metres of collection vehicle. • Currently the council provide a timed banded collection whereby flats above shops residents can present waste for collection in sacks during specific banded times. This is an option to be considered, however this service could be altered in the future. The above planning application has been given a RAG traffic light status of RED for waste storage and collection, based on the waste strategy outlined in the application. Following revisions which locate the proposed waste store in a different location, revised comments have been received: • The occupants should present and collect their bin within a reasonable time from of it being serviced. We would expect this to be put out at 6am and bring back in by 2pm. • If for any reason collections did not take place meaning bins still being on street at a later time then enforcement would check with us/Veolia before taking any action. • If a further discussion could be had with highways through the planning process to actually mark out an area for presentation of bins that would also be helpful. • Residents would be prohibited from using the sack service. • There shouldn't be a conflict between collection days and match days as collection would be between Monday to Friday when matches are in the evening.	It is recommended that a waste management plan be secured by planning condition, to allow the Council to approve management responsibilities.

Stakeholder	Comment	Response
EXTERNAL		
Cadent Gas	No response.	
Environment Agency	No response.	
Historic England	**Comment 1**: We note that the building is considered by the Council to make a neutral contribution to the Conservation Area, and whilst we may disagree on this, we agree that it could be replaced subject to the design of the replacement. This is particularly important given that the existing building represents a highly contextual response to the historic townscape and contributes to local character, and so sets a high bar for any replacement building. We do not consider that the proposals would meet the statutory test of preserving (or enhancing) the character and appearance of the Conservation Area; there would be some harm arising and this would be 'less than substantial' under the terms of the NPPF. The overall design may have beginnings of a sympathetic response, but we consider that it requires further refinement in order for the harm to be appropriately minimised. We recommend that a more thorough assessment of the visual impact of the proposals is undertaken, which should be informed by a detailed contextual analysis of their immediate built environment. Our primary concerns lie in the detailed design and composition of the elevation. The junction with the neighbouring historic buildings requires careful consideration and the drawings do not suggest that this has been successfully resolved, particularly to the north. The submitted drawings also generally lack detail. We strongly recommend that detailed drawings should be required at the planning stage in order to be able to assess whether the new development would match up to the subtle qualities of the existing building, and not left to condition as the design quality should inform the decision. For example, it would be desirable to use an English or Flemish bond alongside flat headed arches with gauged brickwork, which are both positive elements of the existing building, and are commonplace throughout this part of the Conservation Area. Stretcher bond and soldier-course lintels are not felt to be an appropriate substitute. We also question whether a buff or pale brick is an appropriate choice given the prevalence of darker soot-stained brickwork, as a new brick will not darken in the same way. With Paragraph 200 of the NPPF in mind, which encourages opportunities to be taken to enhance or better reveal the significance of conservation areas and the setting of listed	Discussed in the body of the report.

Stakeholder	Comment	Response
	buildings, the history of the site could further inform the design. The probable early-nineteenth century weather-boarded building, which existed on the site until the late-1930s, featured a carriage way leading to a yard known as Chapel Place. The submitted Archaeological Assessment supposes that the site was once that of a royal house, and later a coaching inn known as 'The Horns', a complex which was likely clustered around the yard. Since the carriageway and yard were historically of high importance, it could be worth exploring the possibility of subtly expressing their presence (or the historic urban grain) in the elevation design. This could enhance the understanding of, and better reveal, the significance of the Conservation Area. It could also give a certain logic to the street fronting block which would serve as the entry point to the development at the rear of the site. Recommendation. Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 193 and 194 of the NPPF. **Comment 2 (following revisions):** The submitted amendments relate to changes to the detailed design, including the incorporation of some of the more positive elements of the existing building. A greater level of detail on the drawings has also been provided and further 3D views have been submitted. These are all welcome changes which go some way in addressing our initial concerns. A specific brick blend is also now proposed. The use of a textured brick is likely to be work well in the context of the surrounding historic buildings. However, we remain of the view that the brickwork would be too pale, and that a dark brown brick would likely be more successful in mitigating the impact on the character and appearance of the Conservation Area. Should you be minded to recommend approval, you may wish to reserve the materials by condition to ensure that there is an opportunity to get this right. We also query whether the use of a different red brick for the gauged brick arches, closely mimicking surrounding historic buildings, is the right approach. We originally suggested that the elevational design could be further refined and better respond to the history of the site. We continue feel that more work could be done in this respect, but we are broadly content that the harm to the Conservation Area has been reduced (subject to the choice of brick). We would be happy to participate in any future discussions regarding the	

Stakeholder	Comment	Response
	design if further advice is sought, but we are happy to defer to your specialist conservation and design colleagues in this regard at this stage. Recommendation: Historic England has no objection to the application on heritage grounds. However, we consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 193 and 194 of the NPPF. In determining this application, you should bear in mind the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.	
Historic England (GLAAS)	**Comment 1:** I welcome the submitted archaeological assessment which notes that until 1812, the site was that of The Horns, a roadside inn with very early roots and possible royal connections. The site has certainly been occupied since at least the early seventeenth century and its historical significance could be beneficially articulated in any consented scheme. Because of the above, I recommend that any planning decision be informed by the results of archaeological field evaluation. This work should also feed into design and public realm elements of an acceptable scheme, if the fieldwork results are significant. Because of this, I advise the applicant completes these studies to inform the application: 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 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.	Discussed in the body of the report.

Stakeholder	Comment	Response
	Comment 2 (following revisions): Note that the drawings have been updated since my earlier letter recommending archaeological fieldwork in advance of determination. As these do not respond on that point, I maintain my original comments from June as to impact on remains of the roadside inn. **Comment 3 (further comments)**: If the LPA strongly wishes to grant permission in advance of archaeological investigation, two detailed conditions are recommended (Written Scheme of Investigation prior to demolition and foundation design).	
London Fire Brigade	The London Fire Commissioner would only be satisfied with the proposals if the comments within the Fire Strategy Report below are complied with to meet the requirements of Approved Document B B5 for access and facilities for the fire service. For the front flats, the total distance is 53m to the furthest point on the Third Floor, and for the rear flats it is 49m. Both stair cores therefore require dry risers to be installed. Inlets should be located on the external wall of the building within 18m of the parked pump appliance. There should be outlets on each floor within the stair, the Ground Floor outlet no more than 18m from the inlet is satisfied with the proposals for access and facilities for the fire service Other comments: As per Approved Document B B5 for access and facilities for the fire service. The Commissioner strongly recommends that sprinklers are considered for new development and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers, and can reduce the risk to life. The Commissioner's opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupier. Please note that it is our policy to regularly advise our elected Members about how many cases there have been where we have recommended sprinklers and what the outcomes of those recommendations were. These quarterly reports to our Members are public documents which are available on our website.	Discussed in the body of the report.
Metropolitan Police (DOCO)	No objection in principle, subject to suitably worded planning conditions.	See recommended planning condition.
National Grid	No response.	

Stakeholder	Comment	Response
Thames Water	No response.	
Transport for London	**Comment 1**: The proposed development is car-free in line with policy T6.1 (Residential parking) of the Intend to Publish London Plan, which is welcomed. One accessible disabled parking bay is proposed for the commercial section of the development which complies with policy T6.5 (Non-residential disabled persons parking) of the Intend to Publish London Plan. To comply with the minimum standards of the Intend to Publish London Plan 16 long stay cycle parking spaces should be provided for the residential dwellings proposed. 2 Long stay cycle parking space each should be provided for the B1/D1 uses proposed and 1 long stay cycle parking space for the A1 use should be provided. A covered cycle parking store accessed from Percival Street with capacity for 20 cycles is proposed. This complies with the quantum required by policy T5 (Cycling) of the Intend to Publish London Plan This, and the commitment for the aisle width in the cycle store to be 2.5m beyond the lowered upper stand is welcomed however TfL requests 2 separate long stay cycle parking facilities are provided in order for residential cycle parking access to be exclusive for residents in line with section 8.5.3 (Residential cycle parking) of TfL's London Cycling Design Standard (LCDS) guidance. A separate long stay cycle parking facility should be provided for the retail uses proposed. The aisle width of the corridor required to access the cycle parking storage needs to be clarified and must comply with the standards set out in section 8.2.1 (Cycle parking for all) of TfL's LCDS guidance TfL requests the applicant clarifies how conflicts between cyclists accessing the cycle store and vehicles using the disabled parking bay will be minimised so the application clearly complies with Vision Zero; the Mayor's ambition for all road deaths and serious injuries to be eliminated from London by 2041. TfL is satisfied with the short stay cycle parking proposed and will need to enter a S278 agreement with LB Haringey for these to be installed on High Road. An outline Construction Management Plan (CMP) and Construction Logistics Plan (CLP) have been submitted in support of the application. TfL requests a full CLP is secured via condition and discharged in consultation with TfL prior to construction commencing in line with policy T7 (Deliveries, servicing and construction) of the Intend to Publish London Plan.	Revisions address most of the issues raised. Others are addressed by recommended planning conditions.

Stakeholder	Comment	Response
	TfL is satisfied with the delivery and servicing arrangement proposed. A full DSP should be secured by condition. Overall, subject to clarifications on cycle parking and the full CLP and DSP being secured by condition, TfL has no objections **Comment 2**: Whist it is welcomed that long-stay cycle parking for the commercial and residential uses has been separated in line with Section 8.5.3 of the London Cycling Design Standards (LCDS), TfL hold concerns with the level of security provided for the long-stay commercial cycle parking, seemingly directly accessible from Percival Court. Whilst TfL understands from the swept path analysis provided in figure 2 of the cycle storage diagram that risk of conflicts between cyclists accessing the cycle store and vehicles using the disabled parking bay will be low, TfL hold the view that additional precautions in the form of signage or markings on the parking surface should be provided to clearly indicate that the route will be shared by both cyclists and vehicles.	