

Appendix 3 Internal and external consultee representations

Stakeholder	Comment	Response
INTERNAL		
Design	<p>Much better with the height now – the building addresses its context and mediates between its 3 storey and 4 storey neighbours. The proposed building has been pushed back to realign with the frontages of no 30 and the Beaumaris apartment block. The 3D views demonstrate how these changes allow the building to sit more harmoniously into the context of the street. The distance between the proposed and no30 has remained the same but the impact of that proximity has been reduced by the changes they have made in alignment and scale – it’s not an option to bring the building any closer to the neighbouring apartment block’s windows.</p> <p>There is still the issue of the single aspect flats on each floor, which are avoidable on this site. A window on the west elevation of the north facing flat looking out onto the sedum roof terrace would not overlook its neighbours’ windows and there are some large trees on the boundary which could help with privacy to the garden - seems an easy fix.</p> <p>Good to see they’ve switched the glass balustrades to metal railings too.</p> <p>I’m convinced and happy with the changes they’ve made, some necessary compromises have been made to improve the architectural and urban design qualities of the scheme. Not bad in my view.</p>	<p>Noted.</p> <p>A condition requiring material samples be submitted and approved will be included with any grant of planning permission.</p>
Transport	<p>HGY/2020/1615 - 26-28 Brownlow Road London N11 2DE</p> <p>Demolition of existing buildings; erection of a part-3 and part-4 storey building comprising 23 flats; erection of 1 detached dwelling to the rear with 2 parking spaces, provision of 3 disabled parking spaces at the front; cycle, refuse and recycling storage; provision of new access onto Brownlow Road and accessway to the rear.</p> <p>UPDATED COMMENTS 7/2/21 FOLLOWING UPDATED PROPOSALS</p>	<p>Noted.</p> <p>The recommended s106 obligations, s278 agreement and conditions will be included with any grant of planning permission.</p>

Stakeholder	Comment	Response
	<p>This application seeks to redevelop the existing site at 26 to 28 Brownlow Road in Bounds Green. It currently accommodates two separate houses. It is proposed to construct a four-storey new-build block comprising 23 flats at the front end of the site, and a detached residential dwelling to the rear of the site which would be in addition to two detached houses consented under HGY/2016/3130.</p> <p>The breakdown of the residential units with the proposal is as follows;</p> <ul style="list-style-type: none"> • 7 No. 1 bedroom flats • 14 No. 2 bedroom flats • 2 No. 3 bedroom flats • 1 No. 3 bedroom house <p>A parking space is proposed for the three bedroom house towards the rear of the site and three blue badge bays to the front forecourt for the flats. 44 cycle parking spaces are proposed in total for the development.</p> <p><u>Location and access</u></p> <p>This site is located to the eastern side of Brownlow Road, north of the junction with Maidstone Road. It has a PTAL value of 6a which is considered 'excellent' access to public transport services. 6 different bus services are close by, accessible within 2 to 6 minutes' walk of the site, Bounds Green Underground station is 3 minutes' walk away, and Bowes Park National Rail station is 7 minutes away on foot.</p> <p>It is located within the Bounds Green CPZ which has operating hours of 10.00 – 12.00 Monday to Friday. This CPZ arrangement is primarily for preventing rail heading at the two stations in the locality.</p> <p>At present the site has a double width crossover servicing both no. 26 and no. 28, the earlier consent includes a crossover to the southern side of the site, and this application includes an additional crossover towards the north side which will enable the site to be served by both crossovers providing a carriage drive type arrangement. At this location</p>	

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	<p>along Brownlow Road there are single yellow line waiting and loading restrictions in place, no formal CPZ bays are there so no on street parking bays would be lost by the altered crossover proposals. The applicant would need to enter into the appropriate Highways Act Agreement with the Highway Authority to cover the costs of altering the crossovers and reinstating kerb lines and footways as required.</p> <p>Vehicle tracking plots have been provided with respect to accessing and egressing the disabled parking spaces at the front of the development plus the other spaces and the passing bay along the access to the units at the rear. These appear satisfactory.</p> <p><u>Car Parking considerations</u></p> <p>As commented earlier in this response, it is proposed for the flatted element of the development to be essentially car free except for three blue badge spaces, and to provide a space for the detached three bedroom dwelling. This is a revision from the initial submission which proposed two spaces.</p> <p>Given the excellent public transport accessibility (6A) and local shops and services a short walk away, it is appropriate for the development to be designated as permit/car free, with the applicant entering into the appropriate planning agreement to formalise this. The Council's administrative costs to do this will need to be paid by the applicant and this will be £4,000.</p> <p>Provision of a single car parking space for the detached three bedroom dwelling follows the arrangements with the previously consented detached dwellings that are adjacent which were also consented with a single parking space. The forthcoming/draft London Plan details that for all areas of PTAL 5 to 6, all residential development should be car free. In this instance, Transportation consider provision of one parking space for the detached three bedroom house will be appropriate, to match the previously consented houses adjacent and given the house will be a family sized house.</p>	

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	<p>Considering potential parking impacts in the locality of the site, a Parking Stress Survey was undertaken in accordance with the Lambeth Methodology, and this recorded a parking stress of 67% on the busier of the two survey nights, with 29 spaces free within the 88 available within the 2300m walk survey area.</p> <p>There may be some additional on street parking demands generated by the flats, however given the excellent PTAL and close location to shops and services, it is not expected these will be of any magnitude and should not be problematical in terms of creating a nuisance for existing residents. Designation as 'permit free' should reduce potential new parking demands.</p> <p><u>Cycle parking</u></p> <p>It is proposed to provide a total of 44 cycle parking spaces at the development. 2 spaces for each of the ground floor flats with private outdoor amenity space, plus the three bedroom detached dwelling, and the remainder (36 spaces) being located within an internal cycle parking store for the remaining flats within the block. In terms of the quantum for long stay cycle parking, this meets the requirements of the forthcoming London Plan, however two visitor cycle parking spaces should be provided as well and these are not shown on the drawings.</p> <p>It was noted initially that the proposed cycle parking arrangements included both vertical and wall mounted cycle parking with the internal cycle parking for the flats. The applicant is now proposing in correspondence that all cycle parking within the internal cycle store for the flats will be utilising a two level stacking system with no wall mounted/vertical cycle parking to be used. However the most recent drawings still reference the use of vertical cycle parking within the internal store, and there is still no visitor cycle parking shown (two spaces are required). Also, the drawings indicate 32 cycle parking spaces in the internal store, not 36.</p> <p>As well as meeting the numerical requirements of the London Plan for long stay and short stay cycle parking provision, the applicant will also need to demonstrate the</p>	

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	<p>proposed arrangements accord with TfL's London Cycle Design Standards chapter 8 for cycle parking, and ensure that there is sufficient space for residents to easily use the proposed cycle parking and to meet the requirements for headroom and manoeuvring space (2.5m is required behind two tier parking). There should be 5% provision for larger cycles and clarity over the proposed wall mounted cycle parking should be provided.</p> <p>With respect to the external cycle parking for the detached house and ground floor flats, it will need to be demonstrated that the proposed arrangements will be sufficiently secure and weatherproof.</p> <p>Full details of the proposed arrangements, including scaled drawings showing the proposed layout/arrangements and how the standards of chapter 8 of the London Cycle Design Standards are met, can be covered by condition, with a requirement that the proposed arrangements are approved prior to commencement of the works.</p> <p><u>Delivery and Servicing Access and arrangements</u></p> <p>It is proposed that any visiting delivery and servicing vehicles dwell on the single yellow line at the site or alternatively they can use the formal CPZ bays opposite for short dwell stays associated with service/delivery visits to the development.</p> <p>With regards to waste and recycling, a communal facility is proposed which is about 40m from the highway frontage of the site. It is proposed that the building management team will move bins to a suitable collection point adjacent to the public highway on collection days.</p> <p>It is suggested that a condition be required to detail the arrangements for collection, given the numbers of bins that will be assembled and collected, with details and dimensions of the proposed location for the bins on collection days. Again, this should be clarified prior to commencement of the works to ensure a workable arrangement can be achieved.</p>	

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	<p><u>Sustainable transport initiatives</u></p> <p>The applicant proposes that a 'Home Users Guide' will be issued to each of the residential properties that includes a range of information relating to travel options available to residents. The pack will include details of the on-site car parking strategy, allocating the blue badge spaces to the fully accessible units, how to use the cycle storage facilities, as well as a map identifying cycle paths and routes in the area, a map identifying local public transport routes in and through the area (bus and rail), and timetables for these public transport services. This is welcomed as an initiative.</p> <p>In addition to the 'users guide' the applicant proposes the following to encourage the uptake of sustainable transport modes;</p> <ul style="list-style-type: none"> • provide reimbursement of up to £200 per household within the first year of occupation in relation to purchases made at a number of cycling and sportswear outlets in the borough; • provide London Transport Monthly Travelcards for Zones 1 to 6, totalling no more than two per household within the first year of occupation, but which can be made available to any resident within each household during that period; • fund car club membership for each household, with the funding for each to cover a two-year period at any time within three years from initial occupation of the unit. <p>Transportation are supportive of these proposals and it is suggested that they be covered within the S106 agreement for the development/application.</p> <p><u>Construction Phase</u></p> <p>A construction phase plan has been submitted with the application, this does provide some useful information with respect to the build out of the development, it does reference the use of banksmen to oversee vehicle arrivals, departures and manoeuvres into and around the site, and the scheduling of arrivals and departures by construction</p>	

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	<p>related vehicles to avoid the AM and PM peak periods, and the location and utilisation of a wheel wash.</p> <p>It is suggested that a more worked up version of a construction method statement or similar is conditioned, for submission and approval prior to commencement of the works, this should include information on the construction programme, and provide details of the vehicles that will be visiting the site, such as vehicle sizes, the numbers attending the site on a weekly basis and the like, and clarify/detail how all visiting vehicles will enter and leave the site in a forward gear.</p> <p><u>Summary</u></p> <p>This application seeks to redevelop most of the site at 26 to 28 Brownlow Road in Bounds Green, to construct a four-storey new-build block comprising 23 flats at the front end of the site, and a detached residential dwelling to the rear of the site which would be in addition to two detached houses consented under HGY/2016/3130.</p> <p>Three blue badge spaces will be provided for the block of flats and the fully accessible units within it, and a parking space is proposed for the new three bedroom dwelling to the rear of the site.</p> <p>Given the site's location close to shops and services, and with excellent accessibility to public transport services, it is appropriate that the development be formally designated as car free/permit free, and the applicant will need to meet the Council's costs to do this via the S106 agreement.</p> <p>Otherwise, the applicant is proposing that a number of sustainable transportation initiatives are provided and arranged, including car club membership, vouchers for cycling equipment and clothing, travelcards for the first year of occupation plus local transport information for new residents. These are welcomed and can be covered by the S106 agreement for the development.</p>	

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	<p>Further detail is also required in relation to the proposed arrangements for cycle parking, the construction phase and the refuse/recycling collection arrangements. These items can be covered by pre commencement conditions.</p> <p>Subject to the S106 contributions and conditions referenced above, Transportation do not object to this application.</p> <p><u>Conditions</u></p> <ul style="list-style-type: none"> • Cycle parking • Refuse and recycling collection arrangements • Construction method statement <p><u>S106</u></p> <ul style="list-style-type: none"> • S278 agreement • Formal designation as a permit free/car free development (£4000) • Car club membership provision for two years <p>CONFIRMED 07/03/2021 AMENDED CYCLE STORAGE WAS ACCEPTABLE</p>	
Housing	<p>The Council would not be interested in acquiring two affordable homes of different tenures within this scheme and I suspect that RP's won't be either. I would suggest that the Council accepts a commuted s106 contribution in this case which can be used against the Housing Delivery Programme to support the delivery of larger family homes which are difficult to make viable with grant.</p>	<p>Noted.</p> <p>S106 obligations to secure the affordable housing contribution along with review mechanisms will be included with any grant of planning permission.</p>
Carbon Management (Climate Change)	<p>Carbon Management Response 19/08/2020</p>	<p>Noted.</p> <p>The recommended conditions and s106</p>

Stakeholder	Comment	Response
	<p>In preparing this consultation response, we have reviewed Sustainability and Energy Statement (dated 5 May 2020), prepared by Bluesky Unlimited and relevant supporting documents.</p> <p>Summary The development does not meet the London and Haringey policy requirements. Only a reduction of 24.91% carbon dioxide emissions is achieved on site, which is not supported. Improvements must be made to meet Haringey's requirement to reduce 100% of emissions on site, or at the very minimum, exceed the London Plan minimum of 35% emissions. This should be based on SAP10 carbon factors. Further information needs to be provided in relation to the energy strategy, overheating and sustainability assessments. This should be addressed prior to the determination of the application to remove our objection to the scheme.</p> <p>Energy – Overall 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 24.91% in carbon emissions with SAP10 carbon factors. This represents an annual saving of approximately 5.19 tonnes of CO2 from a baseline of 20.84 tCO2/year.</p> <p>The applicant has also set out carbon reductions based on SAP10.1 carbon factors, however these were only published for consultation and the GLA has set out that SAP10 carbon factors should be used for schemes such as the proposed scheme.</p> <p><u>Actions:</u></p>	<p>obligations will be included with any grant of planning permission.</p>

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	<ul style="list-style-type: none"> - Resubmit the report with SAP10 factors only. - Provide summary tables alongside bar graphs as per Tables 3, 5, 6 & 7 in section 6 of the GLA guidance: https://www.london.gov.uk/sites/default/files/energy_assessment_guidance_2018.pdf - Submit SAP worksheets for a representative selection of dwellings, for those set out in the report. <p>Energy – Lean</p> <p>It is not clear what the % improvement of emissions is through improved energy efficiency standards in key elements of the build. The minimum is 10%, set in Policy SI2 in the Intended to Publish London Plan. The following u-values, g-values and air tightness are proposed:</p> <table border="1" data-bbox="302 740 1016 1081"> <tbody> <tr> <td>Floor u-value</td> <td>0.13 W/m²K</td> </tr> <tr> <td>External wall u-value</td> <td>0.17 W/m²K</td> </tr> <tr> <td>Roof u-value</td> <td>0.13 W/m²K</td> </tr> <tr> <td>Door u-value</td> <td>1.60 W/m²K</td> </tr> <tr> <td>Window u-value</td> <td>1.40 W/m²K</td> </tr> <tr> <td>Air permeability rate</td> <td>4 m³/hm² @ 50Pa</td> </tr> <tr> <td>Mechanical ventilation with heat recovery</td> <td>Efficiency not disclosed</td> </tr> </tbody> </table> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - More units should be designed to be dual or triple aspect to allow for more daylight and better natural ventilation, especially in warm weather. 43.5% of homes will be single aspect. - The u-values can be improved further to achieve higher reductions under Be Lean, in particular the doors and walls. 	Floor u-value	0.13 W/m ² K	External wall u-value	0.17 W/m ² K	Roof u-value	0.13 W/m ² K	Door u-value	1.60 W/m ² K	Window u-value	1.40 W/m ² K	Air permeability rate	4 m ³ /hm ² @ 50Pa	Mechanical ventilation with heat recovery	Efficiency not disclosed	
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	<ul style="list-style-type: none"> - An air permeability rate of 3 m³/hm² @ 50Pa or lower should be achieved on site so that the MVHR and air source heat pumps (ASHPs) can work more efficiently and use less electricity. - Please set out the efficiency of the MVHR - The Be Lean SAP calculations must be done with communal gas boilers, not with the proposed ASHP. Please revise the energy strategy to split out the carbon reduction in line with the GLA's Energy Assessment Guidance (2018). - Confirm that sub-metering will be installed for all dwellings. - What is the proposed g-value of the windows? - Improve lighting energy demand: daylight control and occupancy sensors for communal areas. - Unregulated emissions and demand side response to reducing energy: smart grids, smart meters, battery storage - Set out the energy demand summary, delivered energy requirement at point of use – MWh/year - What is the improvement in the fabric energy efficiency? <p>Energy – Clean The applicant is not proposing any Be Clean measures. The site is not within reasonable distance of a proposed Decentralised Energy Network (DEN). A Combined Heat and Power (CHP) plant would not be appropriate for this site. The report does not assess whether there would be any nearby heat sources to connect to.</p> <p>Energy – Green The application has reviewed the installation of various renewable technologies, but it does not provide sufficiently evidenced reasons why ground source heat pumps, solar thermal or solar photovoltaic panels are not proposed. The report only proposes air source heat pumps (ASHPs) to deliver the Be Green requirement. The ASHPs system will provide hot water and heating to the dwellings through a wet system. It is not clear what % reduction of emissions are proposed under Be Green measures and whether it meets the 20% minimum.</p>	

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	<p>As the on-site carbon reductions are so low, there are opportunities to reduce emissions after further fabric improvements have been made to introduce further renewable energy generation.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - Please clarify where the air source heat pumps will be located, whether this will be a communal or individual system, what their SCOP will be and how the units will be mitigated in terms of visual and noise impact. - Consider additional renewable energy generation. <p>Carbon Offset Contribution</p> <p>A carbon shortfall of 15.65 tCO₂/year remains. The applicant first needs to reduce more carbon emissions on site before a carbon offset contribution can be considered. This will then be calculated at £95/tCO₂ over 30 years.</p> <table border="1" data-bbox="302 781 1205 1008"> <tbody> <tr> <td></td> <td>Residential</td> </tr> <tr> <td>Baseline emissions (tCO₂)</td> <td>20.84</td> </tr> <tr> <td>Cumulative savings: Be Lean, Be Clean and Be Green (tCO₂)</td> <td>5.19</td> </tr> <tr> <td>% improvement</td> <td>24.91%</td> </tr> <tr> <td>Carbon shortfall to offset (tCO₂)</td> <td>15.65</td> </tr> </tbody> </table> <p>Overheating</p> <p>No thermal dynamic overheating assessment has been done. The SAP methodology is not sufficient to assess overheating risk.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - Demonstrate the cooling hierarchy has been followed <ul style="list-style-type: none"> ○ Internal heat generation, i.e. heat distribution infrastructure ○ Heat entering building, i.e. shutters, trees, vegetation, blinds ○ Manage heat through thermal mass and high ceilings 		Residential	Baseline emissions (tCO ₂)	20.84	Cumulative savings: Be Lean, Be Clean and Be Green (tCO ₂)	5.19	% improvement	24.91%	Carbon shortfall to offset (tCO ₂)	15.65	
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	<ul style="list-style-type: none"> ○ Passive ventilation, i.e. openable windows, shallow floorplates, dual aspect, stack effect ○ Mechanical ventilation, i.e. free cooling from outside air in shade, by-pass summer mode - Undertake a Thermal Dynamic Overheating Assessment to demonstrate any potential overheating risk has been mitigated. This must be done in line with CIBSE TM59 with TM49 weather files. - The assumptions and inputs should be clearly reported within the overheating assessment. - Model the following most likely to overheat rooms: <ul style="list-style-type: none"> ○ At least 15% of all rooms across the development site; ○ All single-aspect dwellings facing west, east, and south; ○ At least 50% of rooms on the top floor; ○ 75% of all modelled rooms will face South or South/western facing; ○ Rooms closest to any significant noise and / or air pollution source, with windows closed at all times (unless they do not need to be opened and confirmed in the Noise and the Air Quality Assessments); ○ Communal spaces; ○ Heat losses from pipework and heat interface units for community heating systems - Model all three Design Summer Years 1-3 (DSY), in the urban dataset; - Model all future weather patterns to projected impacts over the time periods 2020s, 2050s and 2080s, the risks, impacts and mitigation strategy set out for each; - Implement mitigation measures and demonstrate compliance with DSY1 for 2020s weather file (high emissions, 50% percentile); - Set out a retrofit plan for future weather files, demonstrating how these measures can be installed and who will be responsible for overheating risk. <p>Sustainability Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The Sustainability</p>	

Stakeholder	Comment	Response
	<p>section in the report sets out the proposed measures to improve the sustainability of the scheme.</p> <p>The development is proposing an extensive living roof. Living roofs are supported in principle, subject to detailed design. Sedum roofs are not supported as the species that grow on such roofs are not native to the UK. Details for both roofs would need to be submitted as part of a planning condition.</p> <p><u>Sustainability actions:</u></p> <ul style="list-style-type: none"> - Details on the biodiversity benefits that this scheme will bring (green infrastructure, bird boxes, bat boxes etc to connect to the green spaces around the site) - Details on the EV charging points that will be delivered in the car park. - A target (%) for responsible sourced materials used during construction. - How surface water runoff will be reduced, that it will be separated from wastewater and not discharged into the sewer. <p>Conclusion Overall, it is considered that the application cannot currently be supported from a carbon reduction and overheating point of view.</p> <p>Carbon Management Response 12/02/2021</p> <p>Some emails were exchanged with the applicant about the Energy Strategy and Overheating reports. A summary is provided below.</p> <p>Overall Energy Strategy The applicant submitted a revised Sustainability and Energy Strategy, dated 27th November 2020.</p> <p>This noted a revised carbon reduction figure of 52.3% with SAP10 carbon factors.</p>	

Stakeholder	Comment		Response	
	Residential			
	Baseline emissions	20.885		
	Be Lean savings	2.519		12.1%
	Be Clean savings	2.617		12.5%
	Be Green savings	5.783		27.7%
	Cumulative savings	10.919		52.3%
	Carbon shortfall to offset (tCO2)	9.966		
	Carbon offset contribution	£95 x 30 years x 9.97 tCO2/year = £28,403		
	Be Lean	The applicant is now proposing triple glazing, with amended fabric efficiency figures noted below.		
Floor u-value	0.11 W/m2K			
External wall u-value	0.17 W/m2K			
Roof u-value	0.13 W/m2K			
Door u-value	1.60 W/m2K			
Window/glazed doors u-value (triple glazed)	0.80 W/m2K			
Air permeability rate	3 m3/hm2 @ 50Pa			
Mechanical ventilation with heat recovery	Efficiency not disclosed			
Heating strategy	The proposed heating strategy of air source heat pumps with direct electric underfloor heating is not considered acceptable. The scheme should avoid direct electric heating unless Passive House fabric efficiencies are being delivered.			

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	<p>Carbon Management Response 04/03/2021</p> <p>The applicant submitted a revised Sustainability and Energy Statement by Bluesky Ltd (dated 24 February 2021). The revised report reflects a revised energy strategy of individual ASHPs providing space heating through radiators or underfloor heating and hot water. It also proposes a 27.2kWp solar PV array.</p> <p>This achieves a revised carbon reduction figure of 71.5% with SAP10 carbon factors. This results in a £16,481.55 carbon offset contribution. The final contribution will be subject to submitting Design Stage and As Built SAP figures.</p> <table border="1" data-bbox="302 669 1371 1015"> <thead> <tr> <th></th> <th colspan="2">Residential</th> </tr> <tr> <th></th> <th>tCO2</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Baseline emissions</td> <td>20.885</td> <td></td> </tr> <tr> <td>Be Lean savings</td> <td>2.519</td> <td>12.1%</td> </tr> <tr> <td>Be Clean savings</td> <td>6.629</td> <td>31.7%</td> </tr> <tr> <td>Be Green savings</td> <td>5.783</td> <td>27.7%</td> </tr> <tr> <td>Cumulative savings</td> <td>14.931</td> <td>71.5%</td> </tr> <tr> <td>Carbon shortfall to offset (tCO2)</td> <td>5.783</td> <td></td> </tr> <tr> <td>Carbon offset contribution (£2,850/tCO2)</td> <td>£16,481.55</td> <td></td> </tr> </tbody> </table> <p>Overheating</p> <p>An Overheating Risk Thermal Model CIBSE TM59:2017 Report by Queensberry Design Ltd, dated 27th November 2020 was submitted as part of this application.</p> <p>The results are summarised in the table below. Nine flats were modelled (27 habitable rooms). Apartment circulation and communal corridor spaces were also modelled.</p> <table border="1" data-bbox="302 1308 1499 1365"> <tr> <td>Residential homes: 18 homes modelled; 59 rooms</td> <td>Corridors: 3 modelled</td> </tr> </table>		Residential			tCO2	%	Baseline emissions	20.885		Be Lean savings	2.519	12.1%	Be Clean savings	6.629	31.7%	Be Green savings	5.783	27.7%	Cumulative savings	14.931	71.5%	Carbon shortfall to offset (tCO2)	5.783		Carbon offset contribution (£2,850/tCO2)	£16,481.55		Residential homes: 18 homes modelled; 59 rooms	Corridors: 3 modelled	
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	Criterion A (<3% hours of overheating) Criterion B hours >26°C (pass <32 hours)	% of rooms pass	Mitigation measures included	Corridor criterion (≤3% over 28°C)	Mitigation measures included	
	DSY1 2020s	44%	No mitigation measures (g-value 0.63; no internal blinds; 30° and 45°)	100%	N/A	
	DSY1 2020s	51%	G-value 0.18			
	DSY1 2020s	81%	Additional ventilation (4ach)			
	DSY1 2020s	100%	More openable windows Internal blinds			
	DSY2 2020s	N/A	Not modelled			
	DSY3 2020s	N/A	Not modelled			
	DSY1 2050s	N/A	Not modelled			
	DSY1 2080s	N/A	Not modelled			
	<p><u>Actions:</u></p> <ul style="list-style-type: none"> - Specify the solar reflectance of the internal blinds. - Confirm the internal blinds would not interfere with the opening of the windows. - Specify the modelled maximum opening areas of windows. - Will occupiers facing Brownlow Road be able to open their windows without being exposed to adverse levels of air pollution or noise levels? <p>Future weather file modelling will be conditioned to understand the full risks of overheating in the future and set out a mitigation plan.</p> <p>Carbon Management Response 31/03/2021</p> <p>The applicant responded to the queries on overheating above. These are acceptable.</p>					

Stakeholder	Comment	Response
	<p>Obligations</p> <ul style="list-style-type: none"> - Be Seen commitment to uploading energy data - Carbon offset contribution (and associated obligations) of £16,481.55 (indicative) plus 10% management fee <p>Conditions</p> <p><u>Energy Strategy</u></p> <p>(a) Prior to the commencement of development, an updated Sustainability & Energy Statement shall be submitted and approved by the Local Planning Authority. This shall be based on the submitted Sustainability and Energy Statement by Bluesky Ltd (dated 24 February 2021) and Overheating Risk Thermal Model CIBSE TM59:2017 Report by Queensberry Design Ltd (dated 27th November 2020). The development shall deliver minimum 71.5% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors.</p> <p>The updated strategy shall include the following:</p> <ul style="list-style-type: none"> - A minimum 12% reduction under Be Lean, with high fabric efficiencies and triple glazing; - A minimum 27.2kWp solar photovoltaic (PV) array; with details including: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp) and the final carbon reduction at the Be Green stage of the energy hierarchy; - Thermal bridging calculations; - A low-carbon space heating and hot water strategy; - Specification, efficiency and location of the proposed Mechanical Ventilation and Heat Recovery (MVHR) and ASHPs, with plans showing the rigid MVHR ducting and ASHP pipework; - Proposed noise and visual mitigation measures for the ASHP; - A metering strategy. 	

Stakeholder	Comment	Response
	<p>(b) Prior to the occupation of development, evidence that the ASHPs and solar PV comply with other relevant issues as outlined in the Microgeneration Certification Scheme Heat Pump Product Certification Requirements shall be submitted to and approved by the Local Planning Authority.</p> <p>(c) Within two months of occupation, energy generation evidence shall be submitted to demonstrate the solar PV array and its monitoring equipment has been installed correctly. The PV array shall be maintained for the lifetime of the development, and cleaned at least annually following installation.</p> <p>Should the zero-carbon target not be able to be achieved on site through energy measures as set out in the aforementioned strategy, then any shortfall should be offset at the cost of £2,850 per tonne of carbon plus a 10% management fee. Should an increased level of CO2 reduction be achieved, any carbon offset payment would be reduced by £2,850 per tonne.</p> <p>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan Policy SP4 and DM22.</p> <p><u>Informative:</u> The applicant should explore a low-carbon heating strategy that avoids direct electric heating, unless strong justification is provided, or the scheme delivers Passive House-level fabric efficiencies. This is in line with the Mayor of London's current Energy Assessment Guidance (April 2020). The applicant should also report on the space heating demand (kWh/m2/year) in their Energy Strategy.</p> <p><u>Overheating</u> (a) Prior to above ground works, an updated Overheating Report modelling future weather files shall be submitted to and approved by the Local Planning Authority. The submission shall assess the future overheating risk and demonstrate how the risks can be mitigated prior to occupation, or as part of a retrofit plan. This assessment will be</p>	

Stakeholder	Comment	Response
	<p>based on the Overheating Risk Thermal Model CIBSE TM59:2017 Report by Queensberry Design Ltd (dated 27th November 2020). It shall include:</p> <ul style="list-style-type: none"> - Further modelling of units modelled and the overheating risk with the 2050s and 2080s weather files for central London; - Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan; - Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment); - Confirmation who will be responsible to mitigate the overheating risk once the development is occupied. <p>(b) Prior to occupation of the development, details of internal blinds to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the blinds, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development, or replace the blinds with equivalent or better shading coefficient specifications.</p> <p>(c) Prior to occupation, the development must be built in accordance with the approved overheating measures:</p> <ul style="list-style-type: none"> - Openable windows; - Fixed internal blinds with white backing; - Window g-values of 0.18 or better; - Mechanical ventilation (4ach); - Hot water pipes insulated to high standards. <p>REASON: In the interest of reducing the impacts of climate change, 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 SI4 of the London Plan (2021), and Policies SP4 and DM21 of the Local Plan.</p>	

Stakeholder	Comment	Response
	<p><u>Living roofs</u> Prior to the commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with native flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change.</p> <p>The submission shall include:</p> <ul style="list-style-type: none"> i) A roof plan identifying where the living roofs will be located; ii) A section demonstrating substrate levels of no less than 120mm for extensive living roofs; ii) A plan showing details of the diversity of substrate depths and types across the roof to provide contours of substrate, such as substrate mounds in areas with the greatest structural support to provide a variation in habitat; iv) Details of the location of log piles / flat stones for invertebrates; v) Details on the range of native species of (wild)flowers and herbs planted to benefit native wildlife. The living roof will not rely on one species of plant life such as Sedum (which are not native); vi) Relationship with photovoltaic array; and vii) Irrigation, management and maintenance arrangements, particularly for the first and second floor smaller living roofs, and those on the third floor. <p>The approved living roofs and photovoltaic array shall be provided before 90% of the dwellings are first occupied and shall be managed thereafter in accordance with the approved management arrangements.</p> <p>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with Policies G1, G5, G6, SI1 and SI2 of the London Plan (2021) and Policies SP4, SP5, SP11 and SP13 of the Haringey Local Plan (2017).</p>	

Stakeholder	Comment	Response
Carbon Management (Pollution)	<p>Re: Planning Application HGY/2020/1615 at 26-28 Brownlow Road N11 2DE</p> <p>Thanks for contacting the Carbon Management Team (Pollution) regarding the above planning application for the Demolition of existing buildings; erection of a part-3 and part-4 storey building comprising 23 flats; erection of 1 detached dwelling to the rear with 2 parking spaces, provision of 3 disabled parking spaces at the front; cycle, refuse and recycling storage; provision of new access onto Brownlow Road and accessway to the rear and I will like to comment as follows.</p> <p>Having considered all the submitted supportive information most especially, the Design Statement, Planning Statement, Sustainability & Energy Statement taken note of the proposed use of Air Source Heat Pump, Construction Phase Plan, Control of dust during Construction, Report on Phase 1 Risk Assessment with reference SAS 16/25819 prepared by Site Analytical Services Ltd dated November 2016, Report on Phase 2 Ground Investigation with reference SAS 16/25819-1 prepared by Site Analytical Services Ltd dated November 2016 and Report on a revised Remediation Strategy and Remedial Action Plan with reference SAS 17/26111 Revision 2 prepared by Site Analytical Services Ltd dated January 2017 taken note of sections 5 (Conceptual Site Model), 6 (Remediation Option Appraisal), 7 (Site Specific Remediation Requirements), 8 (Recommended Remediation Strategy), 9 (Summary of Remediation Measures) and 10 (Other Considerations) of the report, please be advise that we have no objection to the development in relation to AQ and Land Contamination but the following planning conditions and informative are recommend should planning permission be granted.</p> <p>1. Land Contamination</p> <p>Before the development site is occupied:</p> <p>A report that provides verification that the required works submitted in the above Report on a revised Remediation Strategy and Remedial Action Plan with reference SAS 17/26111 Revision 2 prepared by Site Analytical Services Ltd dated January 2017 have</p>	<p>Noted.</p> <p>The recommended conditions and informative will be included with any grant of planning permission.</p>

Stakeholder	Comment	Response
	<p>been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.</p> <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>2. Unexpected Contamination</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>Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.</p> <p>3. NRMM</p> <p>No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at 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>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</p>	

Stakeholder	Comment	Response
	<p>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. Demolition/Construction Environmental Management Plans</p> <ul style="list-style-type: none"> a. Demolition works shall not commence 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> <ul style="list-style-type: none"> a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP). b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include: <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; 	

Stakeholder	Comment	Response
	<p>vi. Details of community engagement arrangements;</p> <p>vii. Details of any acoustic hoarding;</p> <p>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</p> <p>ix. Details of external lighting; and,</p> <p>x. Details of any other standard environmental management and control measures to be implemented.</p> <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> <p>i. Monitoring and joint working arrangements, where appropriate;</p> <p>ii. Site access and car parking arrangements;</p> <p>iii. Delivery booking systems;</p> <p>iv. Agreed routes to/from the site;</p> <p>v. Timing of deliveries to and removals from the site (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible);</p> <p>vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the site during the demolition and construction phase; and</p> <p>vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.</p> <p>d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:</p> <p>i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;</p> <p>ii. A Dust Risk Assessment for the works; and</p> <p>vi. Lorry Parking, in joint arrangement where appropriate.</p> <p>The development shall be carried out in accordance with the approved details with relevant Air Quality Mitigation Measures in addition to the measures submitted in the</p>	

Stakeholder	Comment	Response
	<p>Control of dust during Construction Report. Although a detailed AQ Assessment should have been submitted to ascertain the quality of air in and around the site during construction and operational period.</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>The applicant submitted Construction Phase Plan and Control of dust during Construction Reports above can form part of the documents to discharge the above condition 4.</p> <p>Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.</p> <p>Informative:</p> <ol style="list-style-type: none"> 1. Prior to the demolition, construction and occupation of the proposed new building, any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any aspects of the above works been carried out. 	
Drainage	<p>The LLFA, has now reviewed the drainage strategy for 26-28 Brownlow Road.</p> <p>The drainage consultants have followed the guidance and the SuDS hierarchy to maximise the use of SuDS solutions to control the surface water.</p> <p>The chosen SuDS, are the use of green roofs, water butts to collect rain water for reuse to irrigate the planted gardens, permeable paving throughout the site, rain gardens and a small swale, attenuation of surface water will be achieved using a cellular storage system before being discharged at an agreed rate of 2l/s to the public sewer network.</p>	<p>Noted.</p> <p>A condition requiring an updated SuDs will be included with any grant of planning permission.</p>

Stakeholder	Comment	Response
	<p>A comprehensive management maintenance schedule has been provided and will be in place for the lifetime of the development with the maintenance being undertaken by a management company.</p> <p>For consistency the LLFA, require an updated pro-forma as the one supplied in the documents is out of date, this shouldn't be too onerous as the figures can be transferred from the old form to the updated form, and shouldn't hold up the application at this stage.</p>	
Building Control (fire safety)	Confirms that this Building control office has no objection to the updated Fire safety strategy document and Planning Application, as a detailed fire assessment review will be undertaken as part of the Building regulations application process.	Noted.
Waste Management	<p>There is no further information provided to allow additional comments.</p> <p>As stated in my previous email attached from June 2018 confirmation that tracking has been done in order to prove a waste vehicle will be able to use the turning point and also what measures are being put in place to ensure that this turning point is not obstructed at time of collections?</p> <p>Comments on previous application:</p> <p>Having looked at the revised plan it would seem that the guidance provided has been addressed.</p> <p>The only thing I would like to highlight is that the turning point must be adequate for a waste collection vehicle and also that the turning point is kept clear to enable waste collection to take place.</p> <p>If this is confirmed then RAG GREEN</p>	<p>Noted.</p> <p>A condition requiring refuse management details be submitted and approved will be included with any grant of planning permission.</p>
EXTERNAL		

Stakeholder	Comment	Response
London Borough of Enfield	Have reviewed the information provided on your website and consider that the proposals would not have any strategic implications for this Borough.	Noted.
Transport for London	<p>Many thanks for consulting TfL on the above application. TfL offer the following comments:</p> <p>TfL welcomes that the residential flats will be car free except for disabled parking in line with policy T6.1 (Residential parking) of the Intend to Publish London Plan. Paragraph 4.2.10 of the Transport Statement (TS) sets out that the additional detached dwelling to the rear would come forward with no more than two on-site parking spaces. However, given the site has a public transport access level (PTAL) of 6a no general car parking should be provided. TfL therefore requests the 2 spaces proposed for this dwelling are removed in order to comply with Intend to Publish London Plan T6.1.</p> <p>The quantum of cycle parking proposed should be increased to provide a minimum of 44 long stay and 2 short stay cycle parking spaces. In addition, the cycle parking proposed at present does not comply with TfL's London Cycling Design Standard (LCDS) guidance. Vertical stacking cycle racks are not supported. A minimum of 5% of long stay spaces should be for adapted/larger bikes and a proportion of long stay cycle parking should also be provided as Sheffield stands as they are accessible for all in line with section 8.2.1 of TfL's LCDS guidance. TfL requests the applicant confirms through labelled scale drawings of the long stay cycle parking proposed that a minimum aisle width of 2500mm is provided beyond the lowered frame of the two-tier racks in line with section 8.2.6 (Two-tier stands) of the LCDS. The spacing between enlarged bays for the adapted/larger cycles should comply with figure 8.1 (Recommended cycle parking space requirements) of the LCDS.</p> <p>Any new vehicular crossover should be Road Safety Audited in order to assess that the new accesses proposed do not threaten Vision Zero; the Mayor's ambition to eliminate all deaths and serious injuries from London's road by 2041.</p>	<p>Noted.</p> <p>The cycle storage has been updated and now complies with London Plan standards.</p> <p>A condition requiring provision of the compliant number of cycle spaces prior to occupation will be included with any grant of planning permission.</p>

Stakeholder	Comment	Response
	Overall, TfL requests car parking is amended to comply with the Intend to Publish London Plan.	
Thames Water	<p>Waste Comments:</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. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission:</p> <p>"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."</p> <p>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; roundwater discharges section.</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:</p> <p>"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</p>	<p>Noted.</p> <p>The recommended condition and informatives will be included with any grant of planning permission.</p>

Stakeholder	Comment	Response
	<p>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 piling must be undertaken in accordance with the terms of the approved piling method statement."</p> <p>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.</p> <p>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.</p> <p>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>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>If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.</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:</p>	

Stakeholder	Comment	Response
	<p>“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> <p>On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application.</p> <p>Thames Water recommends the following informative be attached to this planning permission:</p> <p>“Thames Water will aim to provide customers with a minimum pressure of 10m head (approximately 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.”</p>	
London Fire Brigade	The Commissioner is satisfied with the proposals for fire fighting access. Subject to the information in fire statement issue 2.	<p>Noted.</p> <p>An informative recommending the installation of sprinklers to the rear house will be included with any grant of planning permission.</p>