Appendix 3: 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 (although 'Very Good' rather than 'Excellent'). There is no proposed living roof, so proposed condition not required. 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
	MVHR *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.* *Living Roofs* *(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).* *BREEAM Accreditation* *(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.
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	In support – it would be a positive investment into the High Road.	Noted.
Licensing	No comment.	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. Key things we would like to ensure: • The development build is [Equalities Act 2010] compliant • The community outdoor space is dementia friendly. A checklist of recommendations for designing dementia-friendly outdoor environments Neighbourhoods for life [is available]. Air quality, noise and neighbourhood amenity. 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. Accessibility and active travel. We are pleased to see sufficient bicycle storage being proposed for 20 bicycles. 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 Key point we would like to ensure:	

Stakeholder	Comment	Response
	• 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.	
Transportation	Satisfied with the applicant's response to my comments. Also reassured that there is no need for a Section 278 agreement as there are no alterations to the kerb line at the junction of the High Road with Percival Court – the latest swept paths (with the updated kerb line layout) demonstrate that vehicles can exit the site without running over the footway in that location. No objections on transport grounds, subject to the following set of planning conditions and Section 106 planning obligations: **Planning Conditions** 1. Cycle Parking No development shall take place until details of the location of secure and covered cycle parking facilities have been submitted to and approved in writing by the Local Planning Authority. The proposed development shall not be occupied until a minimum of 19 long-stay and 5 short-stay cycle parking spaces for the residents, employees and visitors of the proposed development have been installed in accordance with the approved details and the London Cycling Design Standards. Such spaces shall be retained thereafter for this use only. Reason: To promote travel by sustainable modes of transport and to comply with the London Plan (2021) minimum cycle parking standards and the London Cycle Design Standards. 2. Delivery and Servicing Plan Prior to the first occupation of the development, a Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority. The document shall include the following matters: a) Identifying where safe and legal loading and unloading can take place; b) Ensuring delivery activities do not hinder the flow of traffic on the public highway; c) Managing deliveries to reduce the number of trips, particularly during peak hours; d) Minimising vehicles waiting or parking at loading areas so that there would be a continuous availability for approaching vehicles; and e) Using delivery companies who can demonstrate their commitment to best practice through the Fleet Operator Recognition Scheme (FORS).	The recommended planning conditions and s106 Heads of Terms pick up on these issues.

Stakeholder	Comment	Response
	Reason: To set out the proposed delivery and servicing strategy for the development, including the predicted impact of the development upon the local highway network and both physical infrastructure and day-to-day policy and management mitigation measures. To ensure that delivery and servicing activities are adequately managed such that the local community, the pedestrian, cycle and highway networks and other highway users experience minimal disruption and disturbance. To enable safe, clean and efficient deliveries and servicing. 3. Construction Management Plan Prior to the commencement of development, a Construction Management Plan (including a full Construction Logistics Plan) shall be submitted to and approved in writing by the Local Planning Authority. The document shall include the following matters and the development shall be undertaken in accordance with the details as approved: a) The routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway; b) The estimated peak number and type of vehicles per day and week; c) Estimates for the number and type of parking suspensions that will be required; and d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development, encouraging modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect of the amenity of neighbour properties and to main traffic safety. **Section 106 Planning Obligations** 4. Car-Capped Development The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as “car-free” and therefore no residents therein will be entitled to apply for a resident’s parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4,000 (four thousand pounds) towards the amendment of the TMO for this purpose. Reason: To ensure that the development proposal is car-free and any residual car parking demand generated by the development will not impact on existing residential amenity. 5. Car Club Membership	

Stakeholder	Comment	Response
	The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, which includes the provision of: • two years' free membership for all residents and £50 (fifty pounds in credit) per year for the first 2 years; and • an enhanced car club membership for the family-sized units (3-plus bed units) including 3 years' free membership and £100 (one hundred pounds in credit) per year for the first 3 years. Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.	
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 October 2020 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.	It is recommended that a waste management plan be secured by planning condition, to allow the Council to approve management responsibilities.

Stakeholder	Comment	Response
	• 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.	
EXTERNAL		
Cadent Gas	No response.	
Environment Agency	No response.	
Historic England	Historic England have re-submitted their comments on the earlier application. **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	Discussed in the body of the October 2020 report. No change.

Stakeholder	Comment	Response
	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 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. <u>Recommendation</u>. 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:** 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.	

Stakeholder	Comment	Response
	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 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)	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	Discussed in the body of the October 2020 report and covered by condition.

Stakeholder	Comment	Response
	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. **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 is satisfied with the proposals for firefighting access.	Noted (different from comments on earlier application).
Metropolitan Police (DOCO)	Lighting works well, but I did note some other concerns and have some further concerns that they need to address during the design and build stage: • Communal entrance doors, front and rear – these need to be accredited products to LPS1175 Sr2 or equivalent • Access from the disabled car parking space needs to be managed • Bin store and cycle store doors need to be single doors and accredited • Access control system needs to be reviewed due to the multiple doors and dual access to commercial and residential • Rear residential door needs protection from off street parking blocking the door	See recommended planning condition.
National Grid	No response.	
Thames Water	Waste Comments With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water, we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting	Informative added as requested.

Stakeholder	Comment	Response
	our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor- diverting-our-pipes. The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/ Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB 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. Water Comments 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. 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.	

Stakeholder	Comment	Response
	Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.	
Transport for London	Overall, no objections, subject to the comments below being followed: Parking • 24 cycle spaces will be provided, 5% of which will be able to accommodate larger cycles in line with London Plan policy T5 (Cycling). All cycling should be designed in line with London Cycling Design Standards (LCDS). Cyclists should not have to navigate more than two doors to access an internal cycle storage area. • All short cycle parking should be provided on site, within the public realm close to building entrances. High Road is part of the Strategic Road Network (SRN). TfL would therefore not support additional cycle stands located on the High Road due to impact on pedestrian comfort level and street space. • The development will be car free, save for 1 disabled parking space which is acceptable in line with policy T6 (Car parking) of the London Plan and therefore welcomed by TfL. It is noted the area is in a Controlled Parking Zone (CPZ), and thus all future occupants of the site should be restricted from applying for a parking permit. • TfL queries where hearses will be stored when not in operation if the final use of the development is a funeral directorate. Deliveries and servicing • It is understood most of the servicing will occur on the existing loading bay on High Road. Given the anticipated number of deliveries is low, this is acceptable. • It is welcomed that deliveries and servicing will occur outside of peak AM and PM hours, as this will reduce congestion on the highway network. Delivery movements should also consider the event times at the local Tottenham Hotspur stadium. Construction • TfL strongly welcomes the proposed consolidation of deliveries as this will ensure efficient and sustainable freight movement in line with policy T7 (Deliveries, servicing and construction) of the London Plan.	The scheme addresses most of the issues raised. Others are addressed in the body of the report and by recommended planning conditions. Hearses would be stored on site in proposed parking spaces.

Stakeholder	Comment	Response
	• It is noted deliveries will be turned away if a vehicle is already unloading on site. Therefore, we suggest the employment of a delivery booking system where viable, or the use of a holding area nearby to reduce congestion and unacceptable parking. A holding area will enable vehicles to wait at a suitable location near the site where they can be called to site when appropriate and at short notice. • The submitted Construction Management Plan (CMP) refers to a Construction Logistics Plan (CLP). We have not had access to this document. TfL should be consulted on the CLP, which should be secured by condition and designed in line with TfL guidance: https://constructionlogistics.org.uk/wp-content/uploads/2020/03/CLP-Guidance-by-CLOCS-March-2020-v1.5.pdf The following points should be addressed in the CLP: • The delivery times of the construction vehicles and a swept path analysis for construction vehicles. • The use of Fleet Operators Recognition Scheme (FORS) operators or similar. • Temporary obstructions during the construction and delivery must be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians. General • TfL queries if they E use class would be restricted by condition.	