

Appendix 1: Consultation Responses from internal and external agencies

Stakeholder (LBH)	Comments	Response
<p><b>Design Officer</b></p>	<p>I have no concerns with this proposal, which I consider to be an improvement, in design terms, on the already-acceptable consented scheme. Specifically, the following aspects can be considered improvements:</p> <ul style="list-style-type: none"> <li>• Additional workspace in an area where residential is only supported as part of workspace oriented development, and of a type of workspace designed to appeal to creative and knowledge based employment;</li> <li>• More appropriate distribution of workspace and residential, with the smaller quantum of remaining residential concentrated at the corner of Ashby Road, where it is in closest proximity to existing residential, and with less proposed residential in close proximity to existing neighbouring workspace, which currently includes a number of “dirty”, less neighbourly workspace uses;</li> <li>• Height is comparable to the existing approvals for this site and the site opposite (Bernard Works), with similarly comparable step down to the east as they get closer to the existing residential from the eastern side of Ashby Road opposite. Number of floors to the workspace part of this proposal are less than the existing and neighbouring proposals but that is balanced by greater floor to ceiling height of workspace compared to residential. Nevertheless this tends to give the proposed elevations a more pleasing proportioning due to the taller, more vertically proportioned fenestration;</li> <li>• No longer having residential along a considerable part of the Bernard Road frontage means there is no longer residential depending on the delivery of the proposed park to the north, which would be by other developers and might not have been complete before this development;</li> </ul>	<p>Comments noted. Materials to be controlled by condition.</p>

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	<ul style="list-style-type: none"> <li data-bbox="622 236 1778 384">• The “gap” (down to 1<sup>st</sup> floor) sensibly relocated to the east, so that it separates the proposed residential from the proposed workspace and the benefit of sun and daylight through the gap to the space to the north is of more benefit to the landscaped part of that space;</li> <li data-bbox="622 427 1765 715">• The employment / retail space on the ground floor at the eastern end of the block, proposed to be a café-art gallery, showcasing local businesses’ work, fits well with the proposed employment uses within this development and nearby, helps to animate the street corner at Ashby Road / Bernard Road (/ the new square), and avoids ground floor residential, which in flatted development s such as this, where the development is hard to the public highway, avoids the difficulties for privacy for ground floor residential onto the street;</li> <li data-bbox="622 758 1771 906">• Raising the private communal residential amenity space from ground floor to 1<sup>st</sup> floor will mean better day and (particularly) sunlight to that outdoor amenity space, notwithstanding they continue to also benefit from well day and sunlit rooftop amenity space;</li> <li data-bbox="622 949 1765 1129">• The striking symmetrical design of the main proposed workspace block has a strong identity and clearly expressed main entrance that relates well to the formal space of the proposed park. The materials palette of red and grey brick, with green glazed brick highlights, support and emphasise the elevational composition;</li> <li data-bbox="622 1173 1765 1353">• The green glazed brick, doors and floor to ceiling windows of the ground floor workspace units, along with the same but using red glazed brick to the corner café-art gallery, help further animate the street and provide interesting active frontage, appealing in particular to pedestrians and the vision of this area becoming a more lively and pedestrian friendly neighbourhood;</li> </ul>	

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	<ul style="list-style-type: none"> <li>Outdoor breakout spaces to the upper floor south side of the proposed workspace block provide welcome additional breathing space and encouragement of healthy lifestyle that would cause no disturbance to neighbours, being all also in workspace use. The proposed workspaces are further improved in quality as many more will benefit from good natural light, for many including dual aspect, benefiting health and sustainability.</li> </ul>	
<b>Conservation Officer</b>	<p>Due to the height, mass and scale of the proposed development; its distance from the Seven Sisters/Page Green Conservation Area and any relevant built heritage assets; and taking into consideration emerging development around the site, it is not considered that the proposed scheme would affect any built heritage assets. There is no objection from a conservation perspective.</p>	Comments noted.
<b>Transportation</b>	<p>I have reviewed the above planning application and I have the following comments. I have also set out a number of planning conditions and outlined Section 106 heads of terms for your consideration.</p> <p><b><u>Comments (for the Transport Consultant's Attention)</u></b></p> <p><b>Transport Statement</b></p> <ul style="list-style-type: none"> <li>- This application is for the demolition of the existing building and the erection of commercial units (totalling 3,495m<sup>2</sup>) with associated gallery and café, and nine residential units. The residential units will comprise two one-bedroom units, five two-bedroom units and two three-bedroom units.</li> <li>- Car parking would be provided in the form of two on-street wheelchair-accessible car parking spaces, the residential one on Ashby Road and the</li> </ul>	Comments have been taken into account. The recommended conditions and legal requirements are included.

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	<p>commercial one on Bernard Road. The proposed provision accords with London Plan policy. Due to the high PTAL (6a), the proposed development would qualify for a car-free status so no occupiers therein would be able to apply for on-street resident or business parking permits or permit vouchers, in line with Policy DM32: Parking of the Development Management DPD.</p> <ul style="list-style-type: none"> <li>- Residential cycle parking is proposed to consist of 24 long-stay and 2 short-stay cycle parking spaces. This is in excess of the minimum London Plan (2021) cycle parking standards. Likewise, non-residential cycle parking is proposed to comprise 41 long-stay and 14 short-stay spaces, which is also in excess of the minimum standards. Long-stay cycle parking would be provided internally in dedicated cycle stores and short-stay cycle parking in the public realm. The adequacy of the long-stay cycle parking and access arrangements and compliance with the London Cycling Design Standards would be secured by planning condition. This would involve the provision of full details showing the parking systems to be used, access to them, the layout and space around the cycle parking spaces with all dimensions marked up on a plan.</li> <li>- Non-residential delivery, servicing and waste collection activity would be undertaken from a new loading bay created on the eastern section of Bernard Road between the new link road to Norman Road and Ashby Road, with a maximum duration of 20 minutes. Bollards to the rear of the loading bay would be demountable for emergency access only and the rest of Bernard Road would be traffic-free. Additionally, the removal of the two southernmost on-street car parking spaces on the eastern side of the new link road between Bernard Road and Norman Road would be required to accommodate vehicle movements in and out of the proposed loading bay.</li> <li>- The highway works required to enable these parking and loading proposals (including installation of bollards, resigning and relining works) would be secured by a Section 278 agreement and accompanied by amendments to the</li> </ul>	

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	<p>local Traffic Management Order. In line with the consent for the Bernard Works scheme north of the site, the section of Bernard Road between the new link road with Norman Road and Ashby Road will remain adopted highway and the northern footway along this section will be stopped up and incorporated with the new green space/amenity area.</p> <ul style="list-style-type: none"> <li>- Residential delivery, servicing and refuse collection activity would be carried out on street along Ashby Road. A maximum pull distance of 10m for eurobins would be observed.</li> <li>- The trip generation assessment (existing and proposed) is supported. The first principles used to estimate the existing trips as well as those generated by the proposed light industrial and café/gallery uses may have slightly overestimated the number of peak-hour trips as no assumptions have been made regarding presenteeism levels (usually considered to be around 85% of the workforce on any given weekday) or proportions of employees travelling outside the AM and PM peak hours. It is noted that first principles are not recommended to estimate daily trips as they tend to focus on peak-hour arrivals and departures exclusively. There are still movements taking place outside those hours which are not captured by this methodology. Notwithstanding these observations, the peak-hour trip generation assessment is robust and acceptable.</li> </ul> <p><b>Framework Travel Plan</b></p> <ul style="list-style-type: none"> <li>- The Framework Travel Plan is overall acceptable.</li> <li>- I expect more detailed mode share targets at the Year One, Three and Five horizons. It is stated that the target is that 95% of all employee trips would be made by sustainable modes. When it comes to cycling mode share targets, the aim should be to reach significant utilisation of all non-residential long-stay</li> </ul>	

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	<p>cycle parking spaces by Year Five, well above the baseline 5%. Full utilisation may not be realistic as that would equate to a take-up of all 41 spaces by the 83 commercial employees, i.e. an eventual 50% cycling mode share. Realistic yet ambitious targets should be set for the walking and cycling mode shares.</p> <ul style="list-style-type: none"> <li>- The above should be addressed in the Interim and Full Commercial Travel Plans to be secured by Section 106 planning obligations.</li> </ul> <p><b>Delivery and Servicing Plan</b></p> <ul style="list-style-type: none"> <li>- The Delivery and Servicing Plan submitted is acceptable.</li> <li>- The number of delivery and servicing trips would have to be estimated in a future version of the Delivery and Servicing Plan. The living document would need to focus on the commercial uses. It is acknowledged that there is limited control over residential deliveries and servicing.</li> <li>- We would require the Delivery and Servicing Plan to be updated and submitted to the Council prior to first occupation and within the first six months of first occupation or at 75% occupancy, whichever comes first.</li> </ul> <p><b>Outline Construction Logistics Plan</b></p> <ul style="list-style-type: none"> <li>- The Outline Construction Logistics Plan submitted is acceptable. A Detailed Construction Logistics Plan would be required by planning condition to expand on the present document and provide more information nearer the time of commencement of the demolition and construction works.</li> </ul> <p><b><u>Planning Conditions</u></b></p>	

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	<p>1) <u>Cycle Parking</u></p> <p>No development shall take place until scaled drawings with details of the location and dimensions 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 65 long-stay and 16 short-stay cycle parking spaces for the users 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.</p> <p><u>Reason:</u> To promote travel by sustainable modes of transport and to comply with the London Plan (2021) minimum cycle parking standards and the London Cycling Design Standards.</p> <p>2) <u>Delivery and Servicing Plan</u></p> <p>No development shall be occupied until a Delivery and Servicing Plan (DSP) has been submitted to and approved in writing by the Local Planning Authority. The DSP shall be in broad conformity with the approved Delivery and Servicing Plan (submitted alongside the Transport Assessment) and Transport for London's Delivery and Servicing Plan Guidance (2020). The DSP shall be updated within the first six months of occupation or at 75% occupancy, whichever comes first. Further surveys and updates of the full DSP shall be discussed and agreed with the Local Planning Authority.</p> <p><u>Reason:</u> 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</p>	

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	<p>minimal disruption and disturbance. To enable safe, clean and efficient deliveries and servicing.</p> <p>3) <u>Detailed Construction Logistics Plan</u></p> <p>No development shall commence until a Detailed Construction Logistics Plan (CLP) has been submitted to and approved in writing by the Local Planning Authority. The Detailed CLP shall conform with the approved Outline Construction Logistics Plan (within the approved Transport Assessment) and Transport for London's Construction Logistics Planning Guidance (2021).</p> <p><u>Reason:</u> To provide the framework for understanding and managing construction vehicle activity into and out of the proposed development, encouraging modal shift and reducing overall vehicle numbers. To give the Local Planning Authority an overview of the expected logistics activity during the construction programme. To protect of the amenity of neighbour properties and to maintain traffic safety.</p> <p>4) <u>Public Highway Condition</u></p> <p>No development shall commence until an existing condition survey has been carried out in collaboration with the Council's Highways Maintenance team with respect to the public highway along the site's boundaries, namely the carriageways and footways. After completion of all development works, including any highway works, similarly, a final condition survey will need to be undertaken. The applicant will need to ensure that any damages caused by the construction works and highlighted by the before-and-after surveys are addressed and the condition of the public highway is reinstated to the satisfaction of the Council's Highways Maintenance team. All cost to undertake the surveys and carry out any highway repair works should be paid in full by the applicant.</p>	



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	<p data-bbox="571 236 1765 304"><u>Reason:</u> To ensure the construction works do not result in the deterioration of the condition of the public highway along the site.</p> <p data-bbox="571 347 1003 379"><b><u>Section 106 Heads of Terms</u></b></p> <p data-bbox="622 422 1120 454">5) <u>Interim Commercial Travel Plan</u></p> <p data-bbox="667 478 1758 767">The owner shall no later than three months prior to occupation submit to the Council for approval an Interim Commercial Travel Plan for the future occupiers and visitors of the development, based on the principles set out in the Framework Travel Plan. Without the prior agreement of the Council, the owner shall not allow the development to be occupied until the Interim Commercial Travel Plan has been approved by the Council. The applicant must contribute a sum of £3,000 (three thousand pounds) towards the Travel Plan monitoring cost no later than three months prior to occupation.</p> <p data-bbox="667 810 1742 914">Following approval of the Interim Commercial Travel Plan, the owner and all occupiers and visitors of the development shall comply with the approved Interim Commercial Travel Plan.</p> <p data-bbox="667 957 1751 1098"><u>Reason:</u> To ensure the Travel Plan is appropriately implemented, reviewed and monitored, to maximise its benefits for the users of the development and minimise any adverse impacts of the development upon the local transport networks.</p> <p data-bbox="622 1141 1075 1173">6) <u>Full Commercial Travel Plan</u></p> <p data-bbox="667 1197 1736 1337">Following approval of the Interim Commercial Travel Plan, unless otherwise agreed with the Council, the owner shall submit to the Council a Full Commercial Travel Plan for the occupiers and visitors of the development (including a baseline employee and visitor travel survey and updates to the</p>	

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	<p>mode share targets) no later than six months after first occupation or as soon as 75% of the commercial floorspace becomes occupied, whichever is sooner.</p> <p>Following approval of the Full Commercial Travel Plan, the owner and all occupiers and visitors of the development shall comply with the approved Full Commercial Travel Plan.</p> <p>The owner shall undertake a review of the Full Commercial Travel Plan annually to be submitted to the Council no later than the anniversary of the approval of the Full Commercial Travel Plan or on a reasonable alternative date requested or approved by the Council and notified to the owner.</p> <p>The owner shall have regard to any reasonable recommendations made by the Council upon the operation of the Travel Plan following each annual review and discussion of the same with the Council.</p> <p>The review and monitoring of the implementation of the Travel Plan will span over a period of five years starting from the submission of the Full Commercial Travel Plan (including the baseline employee and visitor travel survey).</p> <p><u>Reason:</u> To ensure the Travel Plan Statement is appropriately implemented, reviewed and monitored, to maximise its benefits for the users of the development and minimise any adverse impacts of the development upon the local transport networks.</p> <p>7) <u>Highway Works (Section 278 Agreement)</u></p> <p>The owner will be required to enter into a Section 278 Agreement to undertake highway works, including:</p>	

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	<p>a) The removal of the two southernmost on-street car parking spaces on the eastern side of the new link road between Bernard Road and Norman Road;</p> <p>b) The subsequent relining and resigning works;</p> <p>c) The creation of a loading bay at the entrance to the Bernard Road cul-de-sac fronting the site;</p> <p>d) The installation of bollards to the rear of the proposed loading bay to restrict access to the Bernard Road cul-de-sac fronting the site.</p> <p>The applicant should contact Haringey Council's Highways Maintenance Team who will carry out the works. They will deal with the provision of estimates and receive payments before the works are undertaken. The applicant must also contribute a sum of £4,000 (four thousand pounds) towards the amendment of the relevant Traffic Management Order (TMO) for this purpose (the amendment shall also cover the implementation of the car-capped development).</p> <p><u>Reason:</u> To enable the construction works on site. To ensure the works are undertaken to high-level standards and in accordance with the Council's requirements.</p> <p>8) <u>Car-Capped Development</u></p> <p>The owner is required to enter into a Section 106 Agreement to ensure that the development is defined as "car-free" and therefore no users therein (residents and commercial occupiers) will be entitled to apply for residents' parking permits, business parking permits or visitor permit vouchers 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 (the amendment shall also cover the modifications to the local parking and loading arrangements).</p>	

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	<p><u>Reason:</u> To ensure that the development proposals are car-free and any residual car parking demand generated by the development will not impact on existing local amenity.</p> <p>9) <u>Car Club Membership</u></p> <p>The owner is required to enter into a Section 106 Agreement to establish a car club scheme, which includes the provision of:</p> <ul style="list-style-type: none"> <li>• two years' free membership for all residents and £50 (fifty pounds in credit) per year for the first 2 years; and</li> <li>• an enhanced car club membership for the residents of the family-sized units (3+ bedrooms) including 3 years' free membership and £100 (one hundred pounds in credit) per year for the first 3 years.</li> </ul> <p><u>Reason:</u> To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.</p>	
<p><b>Regeneration</b></p>	<p><b>General</b></p> <p>Welcome the evolution of the proposals for this site from the consented scheme with a greater quantum of residential space, to the current application which increases the commercial floor area and reduces the residential offer from 45 units down to 9. This will help to ensure that this development supports the character and local economy of the wider area as an employment led location, and will set a positive precedent for meaningful employment-led development in other sites coming forward in the South Tottenham Employment Area.</p> <p><b>S106 contributions</b></p> <p>We would welcome a discussion about the viability of this scheme, its proposed contributions in terms of quantum of affordable workspace – to ensure that this is</p>	<p>Comments and observations have been taken into account. Discussions have taken place with regard to affordable workspace and public realm. Servicing and quality of</p>

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	<p>maximised – and wider contributions to the surrounding area. Priorities include wayfinding to the South Tottenham Employment Area and Seven Sisters and investment in greening and public realm in the surrounding area including a potential contribution to Rangemoor open space improvements.</p> <p><b>Trip Generation</b> On the whole this seems well considered for workers and residents, however this doesn't appear to be provided for commercial and servicing vehicles. Given the quantum of employment space, it would be helpful to understand the estimated number and type of delivery vehicles generated by the development and the proposed routing of these to minimise impact on the adjacent streets (including Wakefield Road which serves Earlsmead School).</p> <p><b>DAS</b> Quality of the detailing of materials and elevational treatments will be fundamental to ensuring that this development makes a positive contribution to its surrounding area. This includes:</p> <ul style="list-style-type: none"> <li>• Details, scale and materiality and positive impact of the proposed signage to ensure that this enhances the overall quality of the scheme</li> <li>• Façade and elevational treatment, in terms of the materiality and difference created between the blocks. The materials choice and differentiation between brick tones will be central to ensuring this reads as a cohesive composition</li> </ul>	<p>materials would be controlled by condition.</p>
<p><b>Climate Change Officer</b></p>	<p><b>Carbon Management Response 21/10/2021</b></p> <p>A meeting was held with the applicant's consultant on 14 October 2021 to discuss the comments and issues with this application. The applicant subsequently responded on 15 October to Carbon Management's comments/conditions (dated 13 October).</p>	<p>Comments noted. Further clarity is required on carbon emissions and development modelling which can be dealt with</p>

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	<p>The applicant clarified that an updated report was submitted to the Council following the initial planning submission: Sustainability and Energy Statement Revision A 8<sup>th</sup> July, prepared by Stinton Jones Consulting Engineers LLP. The previous version had not been superseded so the updated version had been missed.</p> <p><b>Energy Strategy</b> The updated strategy notes a different baseline for the non-residential – outlined in the comparison table below.</p> <table border="1" data-bbox="577 564 1615 949"> <thead> <tr> <th></th> <th colspan="2">Non-residential (June report)</th> <th colspan="2">Non-residential (8<sup>th</sup> July report)</th> </tr> <tr> <th><i>(SAP2012 emission factors)</i></th> <th>tCO<sub>2</sub></th> <th>%</th> <th>tCO<sub>2</sub></th> <th>%</th> </tr> </thead> <tbody> <tr> <td><b>Baseline emissions</b></td> <td colspan="2">57.9</td> <td colspan="2">81.8</td> </tr> <tr> <td><b>Be Lean savings</b></td> <td>0.5</td> <td>1%</td> <td>24.4</td> <td>30%</td> </tr> <tr> <td><b>Be Clean savings</b></td> <td>0.7</td> <td>1%</td> <td>0.7</td> <td>1%</td> </tr> <tr> <td><b>Be Green savings</b></td> <td>19.2</td> <td>33%</td> <td>19.2</td> <td>24%</td> </tr> <tr> <td><b>Cumulative savings</b></td> <td>20.5</td> <td>35%</td> <td>44.4</td> <td>54%</td> </tr> <tr> <td><b>Carbon shortfall to offset (tCO<sub>2</sub>)</b></td> <td colspan="2">37.4</td> <td colspan="2">37.4</td> </tr> </tbody> </table> <p>However, the updated Energy Strategy in its current form is not acceptable and does not comply with the Development Plan. The assumptions within the model are questioned. Examples of such areas include:</p> <ul style="list-style-type: none"> <li>- The Energy Strategy does not follow the Energy Assessment template as set out by the GLA. This means the report does not include all the required information and it is set out differently. The guidance to be followed can be downloaded <a href="#">here</a>.</li> <li>- The commercial areas have gone from achieving a 1% reduction to a 30% reduction under Be Lean within the revision of the Energy Strategy but without any evidence to substantiate such a dramatic increase, or without any</li> </ul>		Non-residential (June report)		Non-residential (8 <sup>th</sup> July report)		<i>(SAP2012 emission factors)</i>	tCO <sub>2</sub>	%	tCO <sub>2</sub>	%	<b>Baseline emissions</b>	57.9		81.8		<b>Be Lean savings</b>	0.5	1%	24.4	30%	<b>Be Clean savings</b>	0.7	1%	0.7	1%	<b>Be Green savings</b>	19.2	33%	19.2	24%	<b>Cumulative savings</b>	20.5	35%	44.4	54%	<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	37.4		37.4		<p>adequately by condition and legal agreement.</p>
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	<p>potential design changes. The commercial areas should demonstrate with evidence how it can achieve the minimum 15% reduction under Be Lean.</p> <ul style="list-style-type: none"> <li>- The Be Lean requirement for residential is also not met (10% minimum).</li> <li>- The ventilation strategy has not been adequately explained or reflected within the energy modelling.</li> <li>- The lack of evidence behind the solar PV strategy to demonstrate the ability to accommodate 59 kWp of solar PV on the roof with an annotated and scaled roof plan and confirmation of how the required capacity was calculated.</li> <li>- The appropriateness of the overheating strategy is also questioned. Further analysis would need to take place to demonstrate the appropriateness of natural ventilation in an industrial area. If these units are allowed to be built, relying on natural ventilation only, they might put pressure on surrounding uses to close due to the noise from industrial and railway uses and the dust and air pollution from industrial uses. The strategy must also demonstrate compliance with windows closed, or alternatively with suitable noise attenuation that would allow for natural ventilation.</li> <li>- The heating strategy in its current form is not acceptable; a future connection to the DEN should be possible, however, the development should propose a low-carbon proposed/interim heating strategy that is policy compliant.</li> </ul> <p><b>Carbon Offset Contribution</b></p> <p>For the purpose of taking this scheme to planning committee, an indicative carbon offset contribution has been calculated based on the latest Energy Strategy (dated 8<sup>th</sup> July 2021). As set out above, this calculation is only indicative. The carbon offset contribution should be recalculated at the planning condition stage once an acceptable fabric efficiency standard and low carbon heating solution has been set out and agreed by the Local Planning Authority. This means the offset contribution may be lower or higher than what is set out below, depending on whether any assumptions are changed and which carbon factor is used. It is considered that the use of SAP10 carbon factors is most appropriate as this scheme is not intended to connect until the DEN connection is available.</p>	

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	<p>The estimated offset contribution of <b>£140,134.50</b>, calculated below, is based on SAP2012 carbon factors.</p> <table border="1" data-bbox="575 379 1615 839"> <thead> <tr> <th data-bbox="575 379 1010 419"></th> <th colspan="2" data-bbox="1019 379 1292 419">Residential</th> <th colspan="2" data-bbox="1301 379 1615 419">Non-residential</th> </tr> <tr> <th data-bbox="575 419 1010 459"><i>(SAP2012 emission factors)</i></th> <th data-bbox="1019 419 1160 459">tCO<sub>2</sub></th> <th data-bbox="1169 419 1292 459">%</th> <th data-bbox="1301 419 1442 459">tCO<sub>2</sub></th> <th data-bbox="1451 419 1615 459">%</th> </tr> </thead> <tbody> <tr> <td data-bbox="575 459 1010 499"><b>Baseline emissions</b></td> <td data-bbox="1019 459 1160 499">11.8</td> <td data-bbox="1169 459 1292 499"></td> <td data-bbox="1301 459 1442 499">81.8</td> <td data-bbox="1451 459 1615 499"></td> </tr> <tr> <td data-bbox="575 499 1010 539"><b>Be Lean savings</b></td> <td data-bbox="1019 499 1160 539">0.4</td> <td data-bbox="1169 499 1292 539">4%</td> <td data-bbox="1301 499 1442 539">24.4</td> <td data-bbox="1451 499 1615 539">30%</td> </tr> <tr> <td data-bbox="575 539 1010 579"><b>Be Clean savings</b></td> <td data-bbox="1019 539 1160 579">0</td> <td data-bbox="1169 539 1292 579">0%</td> <td data-bbox="1301 539 1442 579">0.7</td> <td data-bbox="1451 539 1615 579">1%</td> </tr> <tr> <td data-bbox="575 579 1010 619"><b>Be Green savings</b></td> <td data-bbox="1019 579 1160 619">4</td> <td data-bbox="1169 579 1292 619">34%</td> <td data-bbox="1301 579 1442 619">19.2</td> <td data-bbox="1451 579 1615 619">24%</td> </tr> <tr> <td data-bbox="575 619 1010 659"><b>Cumulative savings</b></td> <td data-bbox="1019 619 1160 659">4.5</td> <td data-bbox="1169 619 1292 659">38%</td> <td data-bbox="1301 619 1442 659">44.4</td> <td data-bbox="1451 619 1615 659">54%</td> </tr> <tr> <td data-bbox="575 659 1010 730"><b>Carbon shortfall to offset (tCO<sub>2</sub>)</b></td> <td colspan="2" data-bbox="1019 659 1292 730">7.3</td> <td colspan="2" data-bbox="1301 659 1615 730">37.4</td> </tr> <tr> <td data-bbox="575 730 1010 839"><b>Carbon offset contribution calculation (including 10% management fee)</b></td> <td colspan="4" data-bbox="1019 730 1615 839">£95 x 30 years x (7.3 tCO<sub>2</sub> + 37.4 tCO<sub>2</sub>) x 10% = £140,134.50</td> </tr> </tbody> </table> <p data-bbox="575 919 752 951"><b>Conclusion</b></p> <p data-bbox="575 959 1783 1318">The Energy Strategy in its current form cannot be supported by the Carbon Management Team as it does not comply with Policies SI2 and SI4 of the London Plan, or with Policy SP4 of the Haringey Local Plan. It is considered that the Energy Strategy should be resubmitted at least six months prior to commencement of the development for reconsideration. This strategy should be in line with the London Plan and Haringey Local Plan policies. Any potentially required design changes may need to be dealt with via planning condition to ensure the development has a policy-compliant energy strategy. A revised carbon offset contribution must be recalculated once the Energy Strategy has been agreed with the Local Planning Authority, prior to payment of the contribution.</p> <p data-bbox="575 1361 1021 1393"><b>Revised Planning Conditions</b></p>		Residential		Non-residential		<i>(SAP2012 emission factors)</i>	tCO <sub>2</sub>	%	tCO <sub>2</sub>	%	<b>Baseline emissions</b>	11.8		81.8		<b>Be Lean savings</b>	0.4	4%	24.4	30%	<b>Be Clean savings</b>	0	0%	0.7	1%	<b>Be Green savings</b>	4	34%	19.2	24%	<b>Cumulative savings</b>	4.5	38%	44.4	54%	<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	7.3		37.4		<b>Carbon offset contribution calculation (including 10% management fee)</b>	£95 x 30 years x (7.3 tCO <sub>2</sub> + 37.4 tCO <sub>2</sub> ) x 10% = £140,134.50				
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Stakeholder (LBH)	Comments	Response
	<p>Revised planning conditions are proposed below to deal with the issues as discussed above.</p> <p><u>Revised Energy Strategy condition</u></p> <p>(a) At least six months prior to the commencement of development, a revised Energy Strategy shall be submitted for approval in writing to the Local Planning Authority. This strategy shall:</p> <ul style="list-style-type: none"> <li>- Demonstrate how the development will comply with the Development Plan to be zero carbon in comparison with total emissions from a building which complies with Building Regulations 2013 Part L (submitting with SAP2012 and SAP10 carbon factors), with a minimum on site carbon reduction of 35%;</li> <li>- Be structured in line with the GLA's Energy Assessment Guidance;</li> <li>- Demonstrate a minimum reduction in carbon emissions under Be Lean of 10% for the residential flats and 15% for the non-residential areas;</li> <li>- Include thermal bridging calculations;</li> <li>- Include a metering strategy;</li> <li>- Provide details of the proposed ventilation, low-carbon heating and hot water strategies, prioritising individual heat pump systems for the flats and a communal heat pump system for the non-residential areas; include details on the efficiency of the equipment, specifications, and location of the equipment on plan;</li> <li>- Demonstrate the maximum possible solar energy to be generated on the roof with a scaled roof plan, with a minimum output of 59 kWp. It should confirm the peak capacity of the solar array; the total energy generation expected on site; the number and type of panels required to deliver this; the angle of and distance between panels (considering overshadowing and maintenance space) set out how the generated energy will be used on site before exporting to the grid;</li> <li>- Details of the future connection points for when the Decentralised Energy Network becomes available; including the building entry route to the site</li> </ul>	

Stakeholder (LBH)	Comments	Response
	<p>boundary which is safeguarded suitably for later excavation without interfering with other services, and designed for Haringey Council to approve;</p> <ul style="list-style-type: none"> <li>- Set out the calculated carbon offset payment should the zero-carbon target not be achieved on site through energy efficiency measures (following the Energy Hierarchy of lean, clean and green measures). Any shortfall should be offset at the cost of £2,850 per tonne of carbon, plus a 10% management fee.</li> </ul> <p>Should the revised energy strategy require any changes to the design, any revised floorplans or elevations shall be submitted for approval via condition.</p> <p>(b) 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. In addition, evidence that the solar PV installation has been installed correctly shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, a six-month energy generation statement, and a Microgeneration Certification Scheme certificate.</p> <p>(c) The final agreed energy strategy shall strictly be installed and in operation prior to the first occupation of the development. The development shall be carried out strictly in accordance with the details so approved and shall be operated and maintained as such thereafter.</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>Revised Overheating condition (Residential)</u>  Prior to the commencement of above ground works, an Overheating Report for the residential flats must be submitted to and approved by the Local Planning Authority. The submission shall assess the current and future overheating risk and propose a retrofit plan. This report shall include:</p>	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> <li>- All the inputs and assumptions that were used to inform the updated overheating model.</li> <li>- Further modelling of homes, to be modelled based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the 2020s, high emissions, 50% percentile files, demonstrating that the residential homes can pass the required overheating requirements without the need to open their windows or need for active cooling, or with appropriate noise attenuation to allow for natural ventilation. The mitigation measures required to pass this will be implemented within the construction of the development prior to the occupation of the residential homes. These approved measures must be retained for the lifetime of the development.</li> <li>- Further modelling of homes modelled based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the 2050s and 2080s, high emissions, 50% percentile files;</li> <li>- 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;</li> <li>- 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), setting out mitigation measures in line with the Cooling Hierarchy;</li> <li>- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.</li> </ul> <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 (LBH)	Comments	Response
	<p data-bbox="573 272 1267 304"><u>Revised Overheating condition (Non-Residential)</u></p> <p data-bbox="573 309 1738 453">Prior to the commencement of above ground works, an Overheating Report for the non-residential spaces must be submitted to and approved by the Local Planning Authority. The submission shall assess the current and future overheating risk and propose a retrofit plan. This report shall include:</p> <ul data-bbox="622 458 1771 1326" style="list-style-type: none"> <li data-bbox="622 458 1630 528">- All the inputs and assumptions that were used to inform the updated overheating model.</li> <li data-bbox="622 533 1771 927">- Further modelling of the office, gallery, café and circulation spaces, to be modelled based on CIBSE TM52, using the CIBSE TM49 London Weather Centre files for the 2020s, high emissions, 50% percentile files, demonstrating that the spaces can pass the required overheating requirements without the need to open their window or with appropriate noise attenuation to allow for natural ventilation during occupied hours. The mitigation measures required to pass this will be implemented in line with the Cooling Hierarchy within the construction of the development prior to the occupation of the non-residential spaces. These approved measures must be retained for the lifetime of the development. The strategy should not use active cooling unless fully justified.</li> <li data-bbox="622 932 1704 1050">- Further modelling of homes modelled based on CIBSE TM52, using the CIBSE TM49 London Weather Centre files for the 2050s and 2080s, high emissions, 50% percentile files;</li> <li data-bbox="622 1054 1765 1173">- 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;</li> <li data-bbox="622 1177 1771 1326">- 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), setting out mitigation measures in line with the Cooling Hierarchy;</li> </ul>	

Stakeholder (LBH)	Comments	Response
	<p>- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.</p> <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>	
<b>Housing</b>	I confirm that the Housing Department has no additional comments to make.	Comments noted.
<b>Pollution</b>	<p>Having considered all the supportive information especially the Design and Access Statement, Planning Statement dated July 2021, Sustainability and Energy Statement dated June 2021, Air Quality Assessment with reference 9.335 prepared by XCO2 dated June 2021 taken note of the report proposed mitigation measures, summary and conclusions and the Preliminary Investigation Report with reference 19396 /PIR prepared by Soils Ltd dated June 2021 taken note of sections 7 (Preliminary Investigation Report Site Model) and 8 (Recommendations), <b>please be advise that we have no objection to the proposed development but the following planning conditions are recommend should planning permission be granted.</b></p> <p><b>1. <u>Land Contamination</u></b>  Before development commences other than for investigative work:</p> <ol style="list-style-type: none"> <li>a. Using the information already submitted on the Preliminary Investigation Report with reference 19396 /PIR prepared by Soils Ltd dated June 2021, an intrusive site investigation shall be conducted for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive</li> </ol>	Comments noted. Conditions included.

Stakeholder (LBH)	Comments	Response
	<p>enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.</p> <ul style="list-style-type: none"> <li>b. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.</li> <li>c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and;</li> <li>d. A report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.</li> </ul> <p><b><u>Reason:</u></b> To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p><b><u>2. Unexpected Contamination</u></b>  If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <p><b><u>Reasons:</u></b> 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><b><u>3. NRMM</u></b></p>	

Stakeholder (LBH)	Comments	Response
	<p>a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <a href="http://nrmm.london/">http://nrmm.london/</a>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.</p> <p>b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p><b>Reason:</b> To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ</p> <p>4. <b><u>Demolition/Construction Environmental Management Plans</u></b></p> <p>a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst</p> <p>b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.</p> <p>The following applies to both Parts a and b above:</p> <p>a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).</p>	

Stakeholder (LBH)	Comments	Response
	<p>b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:</p> <ul style="list-style-type: none"> <li>i. A construction method statement which identifies the stages and details how works will be undertaken;</li> <li>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;</li> <li>iii. Details of plant and machinery to be used during demolition/construction works;</li> <li>iv. Details of an Unexploded Ordnance Survey;</li> <li>v. Details of the waste management strategy;</li> <li>vi. Details of community engagement arrangements;</li> <li>vii. Details of any acoustic hoarding;</li> <li>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</li> <li>ix. Details of external lighting; and,</li> <li>x. Details of any other standard environmental management and control measures to be implemented.</li> </ul> <p>c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:</p> <ul style="list-style-type: none"> <li>i. Monitoring and joint working arrangements, where appropriate;</li> <li>ii. Site access and car parking arrangements;</li> <li>iii. Delivery booking systems;</li> <li>iv. Agreed routes to/from the Plot;</li> <li>v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and</li> <li>vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and</li> </ul>	



Stakeholder (LBH)	Comments	Response
	<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> <ul style="list-style-type: none"> <li>i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;</li> <li>ii. Details confirming the Plot has been registered at <a href="http://nrmm.london">http://nrmm.london</a>;</li> <li>iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;</li> <li>iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);</li> <li>v. A Dust Risk Assessment for the works; and</li> <li>vi. Lorry Parking, in joint arrangement where appropriate.</li> </ul> <p><b>The development shall be carried out in accordance with the approved details. 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.</b></p> <p><b><u>Reason:</u></b> 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><b>5. <u>Combustion and Energy Plant:</u></b></p> <ul style="list-style-type: none"> <li>a. Prior to installation, details of the gas boilers to be provided for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh (0%).</li> </ul>	

Stakeholder (LBH)	Comments	Response
	<p><b><u>Reason:</u></b> As required by The London Plan Policy 7.14.</p> <p>b. Prior to construction of the development details of all the chimney height calculations, diameters and locations must be submitted for approval by the LPA.</p> <p><b><u>Reason:</u></b> To protect local air quality and ensure effective dispersal of emissions.</p> <p>c. Prior to commencement of the development, details of the CHP must be submitted to evidence that the unit to be installed complies with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for Band B. A CHP Information form must be submitted to and approved by the LPA.</p> <p><b><u>Reason:</u></b> To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction.</p> <p><b><u>Informative:</u></b></p> <p>Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
<b>Waste Management</b>	<b>Domestic Waste</b>	Comments noted. Bin stores are of an appropriate

Stakeholder (LBH)	Comments	Response
	<p>Looking at the proposed schedule of accommodation I have calculated that a total of 1530 litres of waste capacity is needed for the residential element of this development. The development will be placed onto a weekly collection schedule for refuse and recycling (although bin capacity should be sufficient for a collection interval of 8 days). This will be collected from 1100l euro bin containers.</p> <p>1 x 1100l refuse container and 1 x 1100 mixed recycling container will be needed. These bins can be purchased by the developer or hired from the council (recommended). Space for 1 x 140l wheeled bin for food waste should also be worked into the plans for the domestic bin store.</p> <p>The location of the domestic bin store is suitable with collection vehicles able to pull up and service the bins from Ashby Road within permitted drag distances.</p> <p><b>Commercial Waste</b></p> <p>The separation of the domestic bin stores from the commercial bin store that will serve the businesses once in occupation is positive. The sizing of commercial bin stores will very much depend on the type of businesses that occupy the commercial units, the waste/recycling they generate and the contracts they put in place for the collection of this. Commercial waste collection providers will provide up to twice daily collections 7 days per week. I would however advise against sizing the bins store based on minimum size and maximum collections. The store should be sufficient to store waste for one week based on the following advised litres for different classes:</p> <ul style="list-style-type: none"> <li>• Offices 2,600 litres per 1,000m<sup>2</sup> of floor space</li> <li>• Retail 5,000 litres per 1,000m<sup>2</sup> of floor space</li> <li>• Restaurants 1,500 litres 20 dining spaces</li> </ul> <p>The location of the commercial bin store is also suitable with collection vehicles able to pull up and service the bins from Bernard Road within permitted drag distances.</p>	<p>size. Commercial waste collection arrangements shall be secured privately.</p>

Stakeholder (LBH)	Comments	Response
	<p>If the developer is able to confirm the space that has been allocated for both the domestic and commercial waste bin stores then we can move forward with agreeing this development from a waste management perspective.</p>	
<p><b>Lead Flood and Water Management Officer</b></p>	<p>Thank you for the completed SuDS proforma on the above development.</p> <p>I have noticed that the developer has now provided the pumping station as the site does not offer the opportunity for Gravity fed drainage. Have they provided a copy of letter confirming Thames Water's consent ?</p> <p>It is also my understanding that in the past Ray requested a management/maintenance plan for the lifetime of the development and confirmation of who will be responsible for the management/maintenance. We still can't see if the same has been submitted along with the details of maintenance for the pumping station ? This will need to be included and the details of a backup system should the pump fail.</p> <p>Hope the above is helpful. Please do not hesitate to contact me should you require any further information.</p> <p>Additional comments:</p> <p>Thank you for your email and providing us with a copy of Flood Risk Assessment for the above development.</p> <p>Having reviewed the same, we are content with the comments from Thames Water as the site now has an agreed point of discharge. Therefore, we have no further comments to make on this application.</p>	<p>Comments noted. Condition included to secure management and maintenance.</p>

Stakeholder (LBH)	Comments	Response
<b>Employment and Skills Officer</b>	<p>No I do not have any comments.</p> <p>Additional comments:</p> <p>Certainly, all the E&amp;S obligations should apply as per the SPD.</p>	<p>Comments noted. Legal requirements included.</p>
<b>Noise ASB Officer</b>	<p>Further to review of the Noise Impact Assessment (dated July 2021) (NIA) and submitted in respect of the above I provide the following:</p> <ol style="list-style-type: none"> <li>1. The proposed development provides for commercial units from the ground to fourth floors and residential dwellings provided to third floor level. The NIA also provides recommendations for noise controls for each floor based on the proposed commercial end uses. It is difficult to confirm that this will sufficiently address noise such that these operations will not give rise to nuisance.</li> <li>2. The applicant has not undertaken an assessment of vibration from the plant/ equipment that will be installed or used at the location. This should be undertaken to ensure that site end users are not adversely affected post occupation.</li> <li>3. The applicant will need to provide additional information regarding proposals for air handling or other plant prior to occupation of the dwellings. They will also need to confirm arrangements for ensuring that noise levels outlined in their NIA are adhered to in the event the units change hands or significantly change their use. One option of providing this will be via the provision of a noise management plan for the development which highlights specific conditions for use of each unit – such as noise levels for permitted plant, requirements for installation and maintenance of additional plant, restrictions on hours of operation / use of each unit etc.</li> <li>4. The applicant will also need to specify details of deliveries to ensure that noise from such activities during the early hours or late evening are avoided.</li> </ol>	<p>Comments noted. Condition will be added. Other noise requirements will be secured through legal agreement.</p>

Stakeholder (LBH)	Comments	Response
	<p>5. The applicant will need to confirm the location and specification of plant and air handling units prior to commencement of the development. We will also require additional monitoring of noise and vibration prior to the occupation of the residential dwellings to ensure the noise levels specified in section 10.8.2 to 10.8.5 of the NIA are achieved as a minimum.</p> <p><i><u>Suggested inclusion for planning condition: Noise arising from the use of any plant and associated equipment shall not increase the existing background noise level (LA90 15mins) when measured (LAeq 15mins) 1 metre external from the nearest residential or noise sensitive premises. The applicant shall also ensure that vibration/structure borne noise derived from the use of any plant or equipment does not cause nuisance within any residential unit or noise sensitive premises.</u></i></p> <p>6. The applicant has specified potential restrictions for the Café and suggested residents will be protected from noise from the Café by virtue of the significant ground floor slab. They also specify noise limits and the use of noise limiters in the event music is required past 11pm and their use needs to be approved once the use of the Café (including operating hours) has been confirmed. Music on the terrace should be restricted to background only (and subject to the usual licensing controls) if required after 11pm in the absence of further information.</p> <p>7. The council has had complaints about noise nuisance from music studios being used in similar settings. We would not expect any space designated as a music studio to overlook or otherwise potentially impact residential dwellings. We do not at this stage have sufficient information to be able to confirm the controls they intend to use here will prevent nuisance from late night use or use via remote rental agreement. We would seek to control (prior to use and occupation) the use of the studio units and recommend provision of a noise management plan (reviewed and agreed by the local planning authority).</p>	

Stakeholder (LBH)	Comments	Response
<b>Lighting Officer</b>	If this is going to remain public highway then the lighting will need to meet the British standard and our current specification.	Comments noted. Condition will be added to any planning permission.
<b>Nature Conservation Officer</b>	<p>Summary</p> <ul style="list-style-type: none"> <li>• The scope of works did not include any additional protected species surveys, associated reports or production of mitigation documents.</li> <li>• This report provides an assessment of the likelihood of presence of relevant legally protected species and Species of Principal Importance on site.</li> <li>• This report does not provide confirmation of presence or likely absence of relevant species from the site (which can typically only be determined through appropriate additional survey work), unless a species was incidentally recorded during the site visit.</li> <li>• It is important to note that any requirement for avoidance, mitigation, compensation and/or enhancement measures for 'important ecological features' can only be confirmed once the recommended additional ecological surveys have been completed.</li> <li>• The PEA exercise does not include or constitute an invasive plant survey. Any evidence of plant species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) was recorded during the visit, but no specific invasive plant survey work was undertaken as this is beyond the scope of the PEA.</li> <li>• Presence of rare or scarce plant communities and invasive plants can go undetected during survey visits conducted in late summer / autumn. However, the entire application site is a building and supports almost no vegetation and is therefore not likely to support any rare or scarce plant communities.</li> </ul>	Comments noted. Condition securing recommendations of the ecological appraisal will be added to any planning permission.

Stakeholder (LBH)	Comments	Response
	<p>Recommendations For the above reasons, I would recommend incorporating all the key recommendations as listed;</p> <p>S.5 The key recommendations of this Preliminary Ecological Appraisal are: -</p> <p>1.       •A Habitats Regulations Assessment is required to assess the potential effects of the proposed new residential units' occupants contributing to recreational pressure on Epping Forest Special Area of Conservation and, possibly, Lee Valley Special Protection Area and Ramsar site.</p> <p>Statutory designated sites of international importance(e.g., SPAs, SACs, Ramsar sites): Internationally important and afforded legal protection by the Conservation of Habitats and Species Regulations 2017 (as amended). The Local Planning Authority should be consulted to determine if the Lee Valley SPA and Ramsar site should also be included in the HRA screening due to its proximity and the listing of a potential recreational pressure in its Site Improvement Plan, despite the Impact Risk Zones not indicating this risk.</p> <p><a href="https://www.biodiversityinplanning.org/results/">https://www.biodiversityinplanning.org/results/</a> Statutory designated sites for nature conservation Local planning authorities may have local protocols for considering the potential effects of development projects on statutory designated sites. These should be checked to ensure they are fully taken into account.</p> <p>2.       •Avoid spreading butterfly bush during the demolition phase and aim to eradicate it prior to demolition, replanting with suitable native species following construction.</p> <p>Avoid spreading butterfly bush during the demolition and construction phases, and aim to eradicate it prior to such works, replanting with suitable native species after construction. If the highly invasive Japanese knotweed (<i>Fallopia japonica</i>), or any</p>	



Stakeholder (LBH)	Comments	Response
	<p>other plant listed on Schedule 9 of the Wildlife and Countryside Act, is unexpectedly discovered on site prior to or during works, all works within 7m of the plant(s) should cease immediately and a suitably experienced specialist should be contacted for advice.</p> <p>3. •An external and internal daytime preliminary bat roost assessment (detailed close inspection) by an experienced bat ecologist is recommended as a precaution.</p> <p>Impacts to bats are unlikely but the presence of a minor roost cannot be ruled out at this stage. A daytime preliminary roost assessment of both internal and external parts of the building</p> <p>4. •If demolition of the building is required to take place within the period March to mid-September inclusive, it must be checked for the presence of active birds' nests within 24 hours prior to such works commencing; and</p> <p>To effectively minimise risks to nesting birds, building demolition should be undertaken in the period mid-September to February (inclusive). This is outside of the typical bird nesting season. If vegetation clearance / building demolition is required within the period March to mid-September (inclusive), a check for nesting birds must be conducted within 24 hours prior to clearance / demolition commencement.</p> <p>5. •The design of the proposed development should incorporate features for wildlife (e.g., bats, birds, invertebrates) to deliver new habitat opportunities for these species / species groups.</p> <p>6. If the commencement of site works is delayed beyond 18 months from the date of issue of this report, an update site walkover should be undertaken by a suitably experienced ecologist.</p>	

Stakeholder (LBH)	Comments	Response

Stakeholder (External)		
<b>Environment Agency</b>	<p>In order to protect groundwater quality from further deterioration: No infiltration-based sustainable drainage systems should be constructed on land affected by contamination, as contaminants can remobilise and cause groundwater pollution. Piling, or any other foundation designs using penetrative methods, should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution. Decommission of investigative boreholes to ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies, in line with paragraph 170 of the National Planning Policy Framework.</p> <p>The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:</p> <ul style="list-style-type: none"> <li>• From <a href="http://www.gov.uk">www.gov.uk</a>: - The Environment Agency's approach to groundwater protection (2017) - Our Technical Guidance Pages, which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency's Guiding Principles for Land Contamination) in the 'overarching documents' section - Use MCERTS accredited methods for testing contaminated soils at the site</li> <li>• From the National Planning Practice Guidance: - Land affected by contamination</li> <li>• British Standards when investigating potentially contaminated sites and groundwater: <ul style="list-style-type: none"> <li>- BS 5930:2015 Code of practice for site investigations;</li> <li>- BS 10175:2011 A2:2017 Code of practice for investigation of potentially contaminated sites</li> <li>- BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points</li> <li>- BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring</li> </ul> </li> </ul>	<p>Comments noted. Informatives are included.</p>

	<p>boreholes are required to establish the groundwater levels, flow patterns and groundwater quality.)</p> <p>All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. The competent person would normally be expected to be a chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.</p>	
<p><b>Thames Water</b></p>	<p>Waste Comments</p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any 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.<a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes</a>. Should you require further information please contact Thames Water. Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a> 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>Observations have been taken into account and conditions and informatives included as appropriate.</p>

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes>.

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. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. 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>.

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: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater 2 into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk) . Application forms should be completed on line via

[www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.

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](http://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. 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.

On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development

	<p>doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way.</p> <p>The applicant is advised to read our guide working near or diverting our pipes. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes</a> The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at <a href="https://www.gov.uk/government/publications/groundwater-protection-positionstatements">https://www.gov.uk/government/publications/groundwater-protection-positionstatements</a>) and may wish to discuss the implication for their development with a suitably qualified environmental consultant.</p>	
<b>London Fire Brigade</b>	The Commissioner is satisfied with the proposals for fire fighting access.	Comments noted.
<b>Metropolitan Police</b>	<p><b><u>Section 1 - Introduction:</u></b></p> <p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference the above application we have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are</p>	Observations have been taken into account. Condition included.

material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).

We have met previously with the project Architects for HGY/2019/1490, a previous consented scheme, to discuss Crime Prevention or Secured by Design (SBD) for the overall site. We have not met with the current applicant regarding this application, who have not made mention crime prevention within their Design Access Statement and have not specified exactly what features of the design will reduce crime. At this point it can be difficult to design out any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.

Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can be easily mitigated early if the Architects or Managing Agency was to discuss this project prior to commencement, throughout its build and by following the advice given. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.

**Section 2 - Secured by Design Conditions and Informative:**

In light of the information provided, we request the following Conditions and Informative:

**Conditions:**

(1) Prior to the first occupation of each building or part of a building or use, a **'Secured by Design' Accreditation** shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained.

	<p>(2) Accreditation must be achieved according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development.</p> <p><b><u>Informative:</u></b></p> <p>The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available <b>free of charge</b> and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p> <p>It has been noted that the current application has significantly reduced the residential aspect of this development and as such greater emphasis should be placed on the commercial achievement of SbD accreditation which in turn may assist in the security element of BREAAAM requirements.</p> <p><b><u>Section 3 - Conclusion:</u></b></p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p> <p>Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.</p>	
<p><b>Historic England (GLAAS)</b></p>	<p>Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.</p>	<p>Comments noted.</p>



LOCAL REPRESENTATIONS:	Summary of objection	Response
<p data-bbox="203 379 506 485"><b>LETTERS FROM 29 INDIVIDUAL ADDRESSES</b></p> <p data-bbox="203 528 465 560"><b>7 IN OBJECTION</b></p> <p data-bbox="203 603 452 635"><b>22 IN SUPPORT</b></p>	<p data-bbox="577 327 1081 359"><b>Material planning considerations</b></p> <ul data-bbox="629 403 1167 1217" style="list-style-type: none"> <li data-bbox="629 403 1077 435">• Overdevelopment of the site</li> <li data-bbox="629 810 1095 842">• Underdevelopment of the site</li> <li data-bbox="629 999 920 1031">• Excessive height</li> <li data-bbox="629 1187 1167 1219">• Excessive size, scale and massing</li> </ul>	<p data-bbox="1352 403 2063 762">Developments must be optimised through a design-led approach according to Policy D3 of the London Plan. The proposal is of a similar scale and massing to the previously approved development at this site which received planning permission in 2020 (ref. HGY/2019/1490). The number of residents/users of the site is expected not to lead to any detrimental impacts on local amenity, or for any other reason as discussed in the committee report.</p> <p data-bbox="1352 810 2056 914">See above. The proposed development has been optimised through a design-led approach and thus it is also not underdevelopment of the site.</p> <p data-bbox="1352 999 2011 1134">The proposal is no greater in height than the previously approved six storey building on this site which was granted planning permission in 2020 (ref. HGY/2019/1490).</p> <p data-bbox="1352 1182 2029 1390">The proposal is of a similar size, scale and massing to the previously approved six storey building on this site which was granted planning permission in 2020 (ref. HGY/2019/1490). Recessed elements are included in the building frontage to allow light to penetrate into public</p>

	<ul style="list-style-type: none"> <li>• Impact on local views</li>   <li>• Excessive on-street parking</li>   <li>• Lack of sunlight</li>   <li>• Loss of light</li>   <li>• Loss of privacy</li> </ul>	<p>realm areas and the building's varied articulation and large number of windows further reduce its massing.</p> <p>The previous application on this site was noted to have a negligible impact on the Local View Corridor no. 26 and, as this proposal is not significantly greater in height, bulk or massing than that previously approved scheme, it is considered that the negligible level of impact on the view corridor would also not be exceeded for this development proposal.</p> <p>Parking spaces would be provided for wheelchair users. The scheme is in an area with excellent public transport access and will be supported by high quality cycle parking areas and other initiatives to discourage car use.</p> <p>The development would include numerous windows and all residential units are dual aspect which enables ample sunlight to reach both residential and commercial units.</p> <p>The submitted Daylight and Sunlight Report demonstrates that light to nearby residential properties and other recently approved developments would not be significantly affected.</p> <p>The development would enable reduced potential for overlooking towards existing residential properties on Ashby Road compared to the</p>
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	<ul style="list-style-type: none"> <li>• Noise impact</li>   <li>• Lack of play space</li>       <li>• Fire safety</li>     <li>• Impact from construction works</li> </ul>	<p>previously approved development at this site which received planning permission in 2020 (ref. HGY/2019/1490). It would be located far enough away from the approved Bernard Works so that loss of privacy would not occur.</p> <p>Adequate controls will be put in place through conditions and legal agreement to manage noise from the development.</p> <p>The development is not required to provide play space as the anticipated child yield is below ten. The development includes communal amenity spaces at first floor level and roof level on the residential block. Several parks with play equipment are available in the local area.</p> <p>The fire service is satisfied with the fire safety of the development. Sprinklers will be installed throughout.</p> <p>Construction and other building works will be managed through an appropriate management plan secured by condition.</p>
	<p><b>Non-planning considerations</b></p> <ul style="list-style-type: none"> <li>• Homes are linked to businesses</li> </ul>	<p>The residential and commercial elements of this scheme are not linked in terms of ownership.</p>

	<ul style="list-style-type: none"> <li>• Lack of supporting information</li>   <li>• Inaccuracies in supporting information</li>   <li>• Lack of and inappropriate public consultation</li> </ul>	<p>The information submitted with the application is considered sufficient to enable an informed planning decision to be made.</p> <p>The information submitted with the application is considered sufficiently clear and accurate to enable an informed planning decision to be made.</p> <p>Site notices were posted in the local area and letters posted to properties in surrounding streets in accordance with the Council's Statement of Community Involvement. The applicant consulted local residents themselves and held a public consultation event at which there were several attendees. This is considered ample public consultation for a development proposal of a similar size and scale to a scheme that was recently granted planning permission in 2020 under application ref. HGY/2019/1490.</p>
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