

Appendix 2: Internal and External Consultee Representations

Stakeholder	Comment	Response									
INTERNAL											
Building Control	Having reviewed the attached fire statement from Buro Happold, I can confirm that it meets the requirements of London Plan D5 and D12 and is suitable for your requirements.										
Carbon Management	<p>Summary The development achieves a reduction of 78% carbon dioxide emissions on site, which is supported. A range of important clarifications and amendments must be provided with regard to the Energy Strategy, Overheating, Sustainability Strategy and Circular Economy Statement. Appropriate planning conditions will be recommended once this information has been provided.</p> <p>Existing and Proposed Areas/Uses The table below sets out the existing and proposed areas for reference.</p> <table border="1" data-bbox="412 651 1612 962"> <thead> <tr> <th></th> <th>Existing</th> <th>Proposed</th> </tr> </thead> <tbody> <tr> <td>The Goods Yard</td> <td>1,012 m² GIA Carberry Enterprise Park 175 m² GIA Station Master's House (to be retained)</td> <td>500 dwellings 1,391 m² GIA commercial 7,094 m² GIA ancillary and parking</td> </tr> <tr> <td>The Depot</td> <td>4,557 m² GIA B&M 284 m² GIA retail terrace 673 m² GIA 867/869 High Road (to be retained)</td> <td>367 dwellings 401 m² GIA commercial 3,618 m² GIA ancillary and parking</td> </tr> </tbody> </table> <p>Environmental Statement This is an EIA development. Climate change has been scoped out for the purpose of this application.</p> <p><u>Action:</u> - Please provide justification why this has been scoped out.</p> <p>Energy – Overall Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013)). The London Plan (2021) further confirms this in Policy SI2.</p> <p>The overall predicted reduction in CO₂ emissions for the development shows a site-wide improvement of approximately 78% in carbon emissions with SAP10 carbon factors (79% domestic, 54% non-domestic), from the Baseline development model (which is Part L 2013 compliant). This represents an annual saving of approximately 653.9 tonnes of CO₂ from a baseline of 838.2 tCO₂/year.</p>		Existing	Proposed	The Goods Yard	1,012 m ² GIA Carberry Enterprise Park 175 m ² GIA Station Master's House (to be retained)	500 dwellings 1,391 m ² GIA commercial 7,094 m ² GIA ancillary and parking	The Depot	4,557 m ² GIA B&M 284 m ² GIA retail terrace 673 m ² GIA 867/869 High Road (to be retained)	367 dwellings 401 m ² GIA commercial 3,618 m ² GIA ancillary and parking	
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Stakeholder	Comment	Response
	<p>The space heating requirement is 31.4 to 44.5 kWh/m²/year. New dwellings should be closer to the 15-20 kWh/m²/year target instead.</p> <p><u>Actions:</u> <i>New Build</i></p> <ul style="list-style-type: none"> - Increase the reduction in carbon emissions to 10% for residential and 15% for the non-residential, based on SAP2012 carbon factors. - Confirm the gross efficiency figure of the communal gas boilers. - Confirm that sub-metering will be installed for all non-residential units. - Should consider daylight control and occupancy sensors for communal residential areas. - What is the proportion of glazed area for resi/non-resi? - Confirm the construction of building and the assumed thermal mass. - What has been considered to address the demand side response to reducing energy: smart grids, smart meters, battery storage? - Which windows are proposed with triple glazing, and why? <p><i>Refurbishment of listed buildings</i></p> <ul style="list-style-type: none"> - Estimate of existing performance of both buildings in unrefurbished condition and outline the source of these assumptions, such as a building condition survey, Energy Performance Certificate (EPC) conventions, industry benchmarks etc. - What will the listed buildings be used for? - Detail what measures will be undertaken to make the retained listed buildings more energy efficient (what type of insulation, how the building will be made more airtight, etc)? And what options have been discounted, for what reasons? <p>Overheating is dealt with in more detail below.</p> <p>Energy – Clean The applicant proposes to connect to the Decentralised Energy Network to supply the development's peak demand, to be built to North Tottenham from the Energy from Waste facility in Edmonton. The model assumes a carbon factor of 0.015 kgCO₂e/kWh. This would result in a reduction in emissions by 556.7 tCO₂ (66%).</p> <p>Detailed comments will be provided by LBH's Energy Infrastructure Manager.</p> <p>Energy – Green As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.</p>	

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	<p>The application has reviewed the installation of various renewable technologies. The report concludes that solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 37.1 tCO₂ reduction of emissions are proposed under Be Green measures.</p> <p>The solar array peak output would be 168 kWp on Goods Yard with 420 panels of 400W on a roof area of 744 m². The solar yield at The Depot is proposed at 45 kWp at The Depot, with 113 panels of 400W on a roof area of 200 m². The efficiency of the proposed panels is assumed at 22.6%.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - What is the orientation of the panels, angle and their modelled renewable electricity output? - A living roof should be installed under the solar PV, or if this is not feasible, the roof should be light coloured to reduce solar heat gains and the improve efficiency of the solar panels. - Section 5 very briefly mentions that emissions include savings from ‘the high reversible heat pump systems using the SAP10 carbon factors’. Please elaborate on this – are these heat pumps proposed for the non-residential spaces, what type of heat pumps? Where would the heat pumps will be located and how the units will be mitigated in terms of visual and noise impacts and impacts from exhausts? Please demonstrate this on plans. What would the Seasonal Coefficient of Performance (SCOP), the Seasonal Performance Factor (SFP) and Seasonal Energy Efficiency ratio (SEER) be of the heat pumps? - Only 4% savings are reported in the Exec Summary under Be Green, but savings of 79% (resi) and 54% (non-resi) are reported under Be Green in Table 5-13. Please clarify that these savings are for the Be Green section only. <p>Carbon Offset Contribution</p> <p>A carbon shortfall of 184.3 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years. A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built.</p> <p>The applicant should present two carbon reduction scenarios, using the template below:</p> <ul style="list-style-type: none"> • Scenario 1: Carbon Offsetting scenario (residual tCO₂ over 30 years; connection to DEN) • Scenario 2: Base Carbon Offsetting scenario (residual tCO₂ over 30 years; communal gas boilers) <table border="1" data-bbox="412 1289 1619 1477"> <thead> <tr> <th data-bbox="412 1289 633 1417"></th> <th colspan="2" data-bbox="633 1289 1090 1417">Base Carbon Offsetting Contribution (Communal gas boiler scenario; tCO₂)</th> <th colspan="2" data-bbox="1090 1289 1619 1417">Carbon Offsetting Contribution (Connecting to DEN scenario; tCO₂)</th> </tr> <tr> <th data-bbox="412 1417 633 1477"></th> <th data-bbox="633 1417 826 1477">Residential</th> <th data-bbox="826 1417 1090 1477">Non-residential</th> <th data-bbox="1090 1417 1317 1477">Residential</th> <th data-bbox="1317 1417 1619 1477">Non-residential</th> </tr> </thead> <tbody> <tr> <td data-bbox="412 1477 633 1477"></td> <td data-bbox="633 1477 826 1477"></td> <td data-bbox="826 1477 1090 1477"></td> <td data-bbox="1090 1477 1317 1477"></td> <td data-bbox="1317 1477 1619 1477"></td> </tr> </tbody> </table>		Base Carbon Offsetting Contribution (Communal gas boiler scenario; tCO ₂)		Carbon Offsetting Contribution (Connecting to DEN scenario; tCO ₂)			Residential	Non-residential	Residential	Non-residential						
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Stakeholder	Comment					Response	
	Baseline						
	Total cumulative savings per annum (tCO ₂ , %)	(%)	(%)	(%)	(%)		
	Shortfall to offset	X1	Y1	X2	Y2		
	Carbon offset payment due for scenario	$(X1+Y1) \times 30 \times \text{£}95 = \text{£A}$		$(X2+Y2) \times 30 \times \text{£}95 = \text{£B}$			
	Carbon Offsetting Contribution payment due at <u>commencement of development</u>	£B					
	Deferred Carbon Offsetting Contribution (+indexation) payment due <u>if not connecting to the DEN</u>	£A - £B = £C					
<p>Payment due at commencement of development: Carbon Offsetting Contribution (DEN connection, Scenario 1).</p>							
<p>A deferred carbon offset contribution is calculated through the difference in the offset contribution:</p> <ol style="list-style-type: none"> 1. If, after 10 years the development has <u>not</u> connected to the DEN, the deferred payment (+indexation) is due (Scenario 2 – Scenario 1 = Deferred Payment) 2. If, after 10 years the development has connected to the DEN, the deferred payment would not be due but this amount would be available as a connection charge to the DEN. 							
<p>Energy - Seen The applicant is proposing a metering strategy, including the installation of energy meters for all residential dwellings (water, electricity, heat) and per building.</p>							
<p>Overheating London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful</p>							

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	<p>design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.</p> <p>In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. Results are listed in the table below.</p> <table border="1" data-bbox="416 375 1619 1455"> <thead> <tr> <th data-bbox="416 375 658 475"></th> <th data-bbox="667 375 1032 475">% of habitable rooms pass</th> <th data-bbox="1041 375 1391 475">% of habitable rooms pass (with ceiling fans)</th> <th data-bbox="1400 375 1619 475">% of corridors pass</th> </tr> </thead> <tbody> <tr> <td data-bbox="416 475 658 815">DSY1 2020s</td> <td data-bbox="667 475 1032 815"> 93/93 GY Block A 75/77 GY Block B 15/15 GY Block C 11/11 GY Block D 22/22 GY Block E 146/152 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G </td> <td data-bbox="1041 475 1391 815"> 93/93 GY Block A 77/77 GY Block B 15/15 GY Block C 11/11 GY Block D 22/22 GY Block E 152/152 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G </td> <td data-bbox="1400 475 1619 815">1 passes, but no details</td> </tr> <tr> <td data-bbox="416 815 658 1155">DSY2 2020s</td> <td data-bbox="667 815 1032 1155"> 43/93 GY Block A 27/77 GY Block B 2/15 GY Block C 4/11 GY Block D 2/22 GY Block E 39/152 Depot Block ABC 5/11 Depot Block D 4/11 Depot Block E 2/6 Depot Block G </td> <td data-bbox="1041 815 1391 1155"> 93/93 GY Block A 77/77 GY Block B 15/15 GY Block C 11/11 GY Block D 22/22 GY Block E 152/152 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G </td> <td data-bbox="1400 815 1619 1155">Not modelled?</td> </tr> <tr> <td data-bbox="416 1155 658 1455">DSY3 2020s</td> <td data-bbox="667 1155 1032 1455"> 0/93 GY Block A 0/77 GY Block B 0/15 GY Block C 0/11 GY Block D 0/22 GY Block E 0/152 Depot Block ABC 0/11 Depot Block D 0/11 Depot Block E 0/6 Depot Block G </td> <td data-bbox="1041 1155 1391 1455"> 93/93 GY Block A 77/77 GY Block B 15/15 GY Block C 11/11 GY Block D 22/22 GY Block E 152/152 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E </td> <td data-bbox="1400 1155 1619 1455">Not modelled?</td> </tr> </tbody> </table>				% of habitable rooms pass	% of habitable rooms pass (with ceiling fans)	% of corridors pass	DSY1 2020s	93/93 GY Block A 75/77 GY Block B 15/15 GY Block C 11/11 GY Block D 22/22 GY Block E 146/152 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	93/93 GY Block A 77/77 GY Block B 15/15 GY Block C 11/11 GY Block D 22/22 GY Block E 152/152 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	1 passes, but no details	DSY2 2020s	43/93 GY Block A 27/77 GY Block B 2/15 GY Block C 4/11 GY Block D 2/22 GY Block E 39/152 Depot Block ABC 5/11 Depot Block D 4/11 Depot Block E 2/6 Depot Block G	93/93 GY Block A 77/77 GY Block B 15/15 GY Block C 11/11 GY Block D 22/22 GY Block E 152/152 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	Not modelled?	DSY3 2020s	0/93 GY Block A 0/77 GY Block B 0/15 GY Block C 0/11 GY Block D 0/22 GY Block E 0/152 Depot Block ABC 0/11 Depot Block D 0/11 Depot Block E 0/6 Depot Block G	93/93 GY Block A 77/77 GY Block B 15/15 GY Block C 11/11 GY Block D 22/22 GY Block E 152/152 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E	Not modelled?	
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Stakeholder	Comment				Response
			6/6 Depot Block G		
	2050s	Not modelled – is required.	Not modelled – is required.		
	2080s	Not modelled – is required.	Not modelled – is required.		
			The Goods Yard	The Depot	
	Number of buildings / total number of dwellings	8 buildings 500 flats		5 buildings 367 flats	
	Number of storeys	33 storeys in Block A 27 storeys in Block B 3-7 storeys in low-rise blocks C-H		6, 28, 33 storeys Block A/B/C 5-7 storeys Blocks D-G	
	Number of spaces modelled	93 habitable rooms Block A (high rise) 77 habitable rooms Block B (high rise) 48 HR Blocks C-E (low rise) 1 corridor 0 non-residential spaces		152 habitable rooms Blocks A-C (high rise) 28 habitable rooms Blocks D-G (low rise) 0 corridors 0 non-residential spaces	
	<p>Almost all rooms pass the overheating requirements for 2020s DSY1, except for Block ABC in the Depot. In order to pass this, the following measures will be delivered built based on:</p>				
	<ul style="list-style-type: none"> - Natural ventilation from 22°C, with 100% (bedroom) and 30% (LKD) of openable area at night - Acoustic louvres for noise attenuated ventilation (30% free area) - Ceiling fans - Glazing g-values of 0.35 and 0.30, - Vertical side fins (not clear where) - MVHR with summer bypass 				
	<p>Only ceiling fans have been modelled to mitigate more extreme weather files. This demonstrates full compliance under 2020s DSY2 and DSY3.</p>				
	<p><u>Actions:</u></p> <ul style="list-style-type: none"> - Redo the overheating modelling with the Central London weather file, which will more accurately represent the urban heat island effect. - The applicant has not modelled the 2050s and 2080s weather files. Please also model these and ensure the future retrofit plan includes measures that can feasibly be implemented in the future to mitigate overheating. 				

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> - Include top-floor flats as these are particularly prone to overheating. - Model the non-residential spaces, particularly where they will be occupied for a longer period of time. Assuming that active cooling will be provided is not sufficient. If the proposed uses are not yet clear, this aspect can be conditioned to ensure that the modelling is based on the potential future occupiers. - Model additional corridors, and set out what the pipework heat loss assumptions are. This should be limited to circa 50W/dwelling (additional requirements can be sent separately as part of the DEN design spec). - Set out what passive measures have been used to reduce cooling demand, and confirm the energy demand and efficiency for the proposed active cooling required in the non-residential spaces: <ul style="list-style-type: none"> o Energy demand (space cooling, not energy used) area-weighted average demand in MJ/m² and total MJ/year o Efficiency of equipment, renewable/free cooling sources - The attached floorplans in Appendix D are not clear; add a key for the colours used and show which dwellings have been modelled. - How will the mitigation measures required to pass the overheating tests be implemented across the entire development (beyond the sample dwellings)? - Set out what kind of external shading has been proposed, for which orientations and windows? Please provide more detailed spec on plan and in section. - The report assumes 'high ceilings', but the floor to ceiling heights have only been reported at 2.5m. This is the minimum height required in London, so it is recommended that higher floor to ceiling heights are used to increase ventilation and stratification of hot air. - Set out the proposed internal finishes (in relation to thermal mass). - Clarify whether all dwellings are dual aspect. The image (Figure 6-1) shows cross-ventilation between what looks like an inset balcony and a front door. Is that what has been assumed? If so, it should assume that a front door will be closed at all times. - Confirm who will own the overheating risk (this should not be the individual residents). - Identify communal spaces (indoor and outdoor) where residents can cool down if their flats are overheating. <p>Overall Sustainability Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The Sustainability section in the report sets out the proposed measures to improve the overall sustainability of the wider scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO₂ emissions and landscape design.</p> <p>Domestic/site-wide <u>Actions:</u> Please clarify:</p>	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> - How have the open spaces within the red line been planned to be suitable for different types of typical weather for people to enjoy and use the open spaces and how the open spaces will be more resilient in extreme weather (benches in sunny spots in colder months, shading for hot weather, resilience against drought/persistent lack of rainfall, localised flooding, shelter from winds, etc.)? Please annotate this on a plan how the landscaping has been designed appropriately. - How will the development contribute to the wider EV network? - How water demand will be reduced for the maintenance of open/green spaces? Rainwater should be harvested for the use of people maintaining soft landscaping. - Will any food growing opportunities be introduced for residents/the wider community? Please consider, and also ensure that this is facilitated by appropriate water points, composting opportunities, etc. - Will the development achieve a biodiversity net gain? And what is the urban greening factor? <p>Non-Domestic BREEAM Requirement Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.</p> <p>The applicant has prepared a BREEAM Pre-Assessment as part of the Sustainability and Energy Strategy for the 'Shell and Core' for the proposed non-domestic spaces. Based on this pre-assessment, a score of 55.6 % is expected to be achieved for the retail units, equivalent to 'Very Good' rating. A potential score of 70.8% could be achieved (Excellent rating). The tracker was included in the appendices and the graph provided a helpful overview of the targeted/achievable/unachievable credits per category.</p> <p>The current targeted score is just scraping the 'Very Good' requirement and the applicant is strongly encouraged to target more credits to be certain of the minimum accreditation and also to improve the sustainability of the non-domestic spaces.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - Clarify what uses will be proposed at the site, and whether only a 'Retail' use assessment has been undertaken? Is it likely that this use will change following permission? - Seek to achieve Mat02, this is an important part in achieving low-carbon and environmentally friendly designs. - Seek to achieve Wst 05 adaptation to climate change, this will improve the resilience for occupiers. - Seek to achieve Wst 06 as this forms an important part in the circular economy principles and commitments as set out in the Circular Economy Statement. <p>Whole Life Carbon</p>	

Stakeholder	Comment	Response												
	<p>Policy SI2 requires developments referable to the Mayor of London to submit a Circular Economy Statement and demonstrate actions undertaken to reduce life-cycle emissions. The applicant's whole-life carbon assessment has been included within the Sustainability and Energy Statement.</p> <p>The total calculated emissions based on the GIA is estimated at:</p> <table border="1" data-bbox="412 339 1610 584"> <thead> <tr> <th></th> <th>Estimated whole-life carbon emissions</th> <th>Meets benchmark?</th> </tr> </thead> <tbody> <tr> <td>Modules A1-A5</td> <td>557 kgCO₂e/m²</td> <td>Between aspirational and standard (GLA)</td> </tr> <tr> <td>Modules B-C (excl. B6 and B7)</td> <td>304 kgCO₂e/m²</td> <td>At standard (GLA)</td> </tr> <tr> <td>Module D</td> <td>-174 kgCO₂e/m²</td> <td>N/A</td> </tr> </tbody> </table> <p>The highest embodied carbon in Modules A1-A5 is attributed to the superstructure (63%) and substructure (25%). In Modules B-C (excl B6 & B7) the highest contributors in embodied carbon are the services (39%), superstructure (29%) and finishes (18%). A number of areas have been identified to calculate more accurately and to reduce the embodied carbon of the buildings.</p> <p>Circular Economy Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans. The applicant has submitted a Detailed Circular Economy Statement.</p> <p>The principles used for this development are:</p> <ul style="list-style-type: none"> - Designing for longevity, circa 50 years of building life, and disassembly at end of life - Designing for flexibility and adaptability of open spaces and commercial spaces - Retaining and refurbishing Grade II listed buildings - Demolishing and recycling industrial/retail units - Minimise operational waste and provide adequate space for recycling <p>The report sets out the Key Commitments (Table 4-1), Bill of materials (Table 4-2) and Recycling and waste reporting form (Table 4-3) for the Goods Yard and The Depot. This is a fairly high level of information, and the applicant expects this to become more detailed as the detailed design progresses following permission.</p> <p><u>Comments and actions:</u></p>		Estimated whole-life carbon emissions	Meets benchmark?	Modules A1-A5	557 kgCO ₂ e/m ²	Between aspirational and standard (GLA)	Modules B-C (excl. B6 and B7)	304 kgCO ₂ e/m ²	At standard (GLA)	Module D	-174 kgCO ₂ e/m ²	N/A	
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Module D	-174 kgCO ₂ e/m ²	N/A												

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> - Clarify whether the internal floor to ceiling heights have also been reduced based on the floor-to-floor heights reducing? Please weigh this up against the benefit of higher floor to ceiling heights for ventilation purposes and mitigation against overheating. - Provide more detail in relation to the testing done to optimise fenestration size in relation to daylighting, overheating, overlooking and resource efficiency - What solutions have been sought to reduce energy/water use and emissions to produce the proposed concrete structures (including the cement)? - Which buildings may benefit from a CLT structure and what feasibility work has been undertaken? Please indicate this within a plan. - What analysis has been undertaken to choose the right insulation and other construction materials in relation to the energy intensity, water use (and other environmental impacts)? - Do the roofs include a minimum settled substrate depth of 120mm (with varied depths) for extensive living roofs and 250mm minimum for intensive living roofs? - What operational water saving measures will be included in the proposal for the site and operation of individual buildings? - What level of recycled content in building materials is expected to be achieved or is targeted? The use of (almost) fully recycled steel should be prioritised and recycled bricks should also be considered. - Can any existing sub-structure be utilised on the site? What analysis has been undertaken to support that? - The applicant should utilise sources like the Green Guide to Specification (materials of A or better) or Environmental Product Declarations to inform sustainable material choices. - Please include the pre-demolition audit and set out which materials are viable for retention, disassembly and reuse, repurposing (without downgrading!) or recycling. - Materials used for temporary works should fully disassemble and be designed to be reused (without damage). - 'The building footprints have been considered to limit the impact on the site given the number of new homes being provided.' This doesn't make much sense or have much meaning. Please clarify. - What techniques will be incorporated into the design to ensure some materials can be replaced at the end of their life without affecting the surrounding materials (e.g. façade and interiors)? - What has been done to balance the need for transfer slabs and columns with regard to designing for flexible ground floor spaces (and elsewhere, where relevant)? - How long will the building lifespan of the existing buildings be extended by? And what will their enhanced expected lifespan be? What will be done to extend their lifespan, including how the buildings will mitigate the impacts of climate change and adapt to the impacts of climate change? - The emphasis on construction waste seems to be on demolition rather than disassembly 	

Stakeholder	Comment	Response
	<p>Living Roofs All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. The development is proposing living roofs in the development.</p> <p>All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth.</p> <p>Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition.</p> <p>Conclusion Overall, it is considered that the application could be supported in principle from a carbon management and sustainability point of view, subject to resolving the queries and concerns listed above.</p> <p>Planning Conditions To be secured (with detailed wording TBC):</p> <ul style="list-style-type: none"> - Energy strategy - Overheating - BREEAM Certificate - Living roof(s) - Circular Economy - Whole-Life Carbon - Biodiversity <p>Planning Obligations</p> <ul style="list-style-type: none"> - Be Seen commitment to uploading energy data - Carbon offset contribution (and associated obligations) of £TBC (indicative), plus a 10% management fee - Connect to the DEN within 10 years of the permission <p>Carbon Management Response 09/09/2021</p> <p>Overview</p>	

Stakeholder	Comment	Response
	<p>The applicant issued a response to the above comments by the Climate Change Officer on 1st September 2021. A meeting was subsequently had between the applicant and LBH on 1st September 2021. Our response to the applicant's response has been included in a separate document.</p> <p>Outstanding Items</p> <p>A number of issues are still outstanding, which we understand are currently being considered by the applicant. These are:</p> <ul style="list-style-type: none"> - Reducing emissions further under Be Lean of the Energy Hierarchy. Find opportunities to reduce space heating demand, or seek alternative options that would not necessarily improve the SAP results at Be Lean before a decision is made, but would improve the overall scheme at detailed design stage: <ul style="list-style-type: none"> o Ensuring the air tightness levels are improved and delivered at construction stage with an air tightness plan and airtightness coordinator working with the construction manager o Calculating the detailed thermal bridges and pushing to reduce the heat losses o Committing to exceed the CP1.2 good practice guidance o Improving the thermal performance of the listed buildings - Remodelling the overheating results with the Central London weather file. - Further modelling of additional internal corridors. - Designation and annotation of communal 'cool spaces' on the proposed plans. - Whether any EV charging points will be provided for public use. <p>Aspects that were agreed during the meeting to be conditioned (subject to the detailed wording) were:</p> <ul style="list-style-type: none"> - Thermal bridge calculations - Future weather file modelling and the preparation of a retrofit plan to meet the future weather files - Current and future weather file modelling for the non-residential spaces if they are to be used as office/workspace, community, healthcare, or educational uses. - BREEAM assessment for different uses. <p>Planning Conditions</p> <p><u>Energy Strategy</u></p> <p>(a) Prior to the commencement of construction works, a revised Energy Strategy must be submitted with Design Stage SAP worksheets. The development will achieve minimum carbon emissions savings of 78% over 2013 Building Regulations Part L with SAP2012 carbon factors, with a minimum solar PV array of 168 kWp on the Goods Yard and minimum 45 kWp on the Depot sites. The revised strategy will further respond to outstanding issues as set out in the committee report:</p> <ul style="list-style-type: none"> - Achieve minimum carbon reductions at the Be Lean Stage of 10% for the domestic new build and 15% for the non-domestic new build elements; - An air tightness delivery strategy; 	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> - Detailed thermal bridging calculations demonstrating how thermal bridging will be reduced; - Set out detailed design of the heat network within the blocks and how this complies with CIBSE CoP1 and the LBH Generic Specification. This should include detailed calculation of distribution losses (based on pipe routes and lengths, pipe sizes, taking account of F&R temperatures and diversification and insulation) to calculate total heat loss from the system expressed in W/dwelling and should demonstrate losses have been minimised; - Set out a strategy for the supply of heat to any phases occupied before the site-wide energy centre is available; - Set out a strategy that ensures a heat can be supplied to the other sites within the High Road West masterplan area via this development site; - Provide further detail of how the developer will ensure the performance of the system will be safeguarded through later stages of design, construction and commissioning including provision of key information on system performance required by CoP1. - A metering strategy. <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.</p> <p>The final agreed energy strategy shall 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, SI3, and Local Plan Policy SP4 and DM22.</p> <p><u>DEN connection [TBC by Energy Infrastructure Manager]</u></p> <p><u>Overheating (non-residential)</u> Prior to the occupation of each non-residential area, an Overheating Report must be submitted to and approved by the Local Planning Authority if that space is to be occupied for an extended period of time or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.</p> <p>The report shall be based on the current and future weather files for 2020s, 2050s and 2080s for the CIBSE TM49 central London dataset. It shall set out:</p> <ul style="list-style-type: none"> - The proposed occupancy profiles and heat gains in line with CIBSE TM52 - The modelled mitigation measures which will be delivered to ensure the development complies with DSY1 for the 2020s weather file. 	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> - A retrofit plan that demonstrates which mitigation measures would be required to pass future weather files, with confirmation that the retrofit measures can be integrated within the design. <p>The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.</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> <p><u>Future overheating (residential)</u></p> <p>Prior to above ground works, an updated Overheating Report that includes modelling of future weather files must be submitted to and approved by the Local Planning Authority. The submission shall assess the future overheating risk and propose a retrofit plan. This assessment shall be based on the Sustainability and Energy Statement (dated 27 May 2021, Rev P05) UPDATED prepared by Buro Happold.</p> <p>The report shall include:</p> <ul style="list-style-type: none"> - Further modelling of units modelled and the overheating risk with the 2050s and 2080s weather files for central London; - Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation (if any), and which measures will form part of the retrofit plan; - Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment); - Confirmation who will be responsible to mitigate the overheating risk once the development is occupied. <p>Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:</p> <ul style="list-style-type: none"> - Natural ventilation, with 100% (bedroom) and 30% (LKD) of openable area at night - Acoustic louvres for noise attenuated ventilation (30% free area) - Ceiling fans (where identified to be necessary) - Glazing g-values of 0.35 and 0.30 - Vertical side fins - MVHR with summer bypass 	

Stakeholder	Comment	Response
	<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> <p><u>Living roofs/walls</u></p> <p>a) Prior to the commencement of development, details of any living roofs and/or living walls must be submitted to and approved in writing by the Local Planning Authority. Living roofs and walls must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:</p> <ul style="list-style-type: none"> i) A roof plan identifying where the living roofs will be located; ii) A ground floor plan identifying where the living walls will be rooted in the ground, if any; iii) Sections demonstrating installed and expected settled substrate levels of no less than 120mm for extensive living roofs, and no less than 250mm for intensive living roofs; iv) Roof plans annotating details of the diversity of substrate depths and substrate types across the roof to provide contours of substrate, including annotation of substrate mounds and sandy piles in areas with the greatest structural support to provide a variation in habitat, with a minimum of one feature per 10m² of living roof; v) Roof plans annotating details of the location of semi-buried log piles / flat stones for invertebrates, with a minimum footprint of 1m² and at least one feature per 10m² of living roof; vi) Details on the range of native species of (wild)flowers, herbs in the form of seeds and plug plants planted on the living roofs, or climbing plants planted against walls, to benefit native wildlife. The living roofs will not rely on one species of plant life such as Sedum (which are not native); vii) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and viii) Management and maintenance plan, including frequency of watering arrangements. <p>(b) Prior to the occupation of 90% of the dwellings, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of sedum, planting and biodiversity measures. If the Local Planning Authority finds that the living roof has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof(s) and/or walls shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.</p>	

Stakeholder	Comment	Response
	<p>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with Policies G1, G5, G6, SI1 and SI2 of the London Plan (2021) and Policies SP4, SP5, SP11 and SP13 of the Haringey Local Plan (2017).</p> <p><u>Biodiversity</u> [to be signed off by Nature Conservation Officer/Biodiversity Officer]</p> <p>a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.</p> <p>(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.</p> <p>Development shall accord with the details as approved and retained for the lifetime of the development.</p> <p>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with Policies G1, G5, G6, SI1 and SI2 of the London Plan (2021) and Policies SP4, SP5, SP11 and SP13 of the Haringey Local Plan (2017).</p> <p><u>BREEAM (or equivalent)</u></p> <p>(a) A minimum of 6 months 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 “Very Good” outcome (or equivalent) for each non-residential use within the development.</p> <p>The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.</p> <p>(b) At least 6 months prior to occupation, a post-construction certificate issued by the Building Research Establishment (or equivalent) for each non-residential use must be submitted to the local authority for approval, confirming this standard has been achieved.</p> <p>In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial</p>	

Stakeholder	Comment	Response
	<p>works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</p> <p>Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan Policy SP4 and DM21.</p> <p><u>Circular Economy</u> Prior to the occupation of any building, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement shall be submitted to the GLA at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance. The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation.</p> <p>Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials.</p> <p><u>Whole Life Carbon</u> Prior to the occupation of each building, the post-construction tab of the GLA's whole life carbon assessment template should be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage, including the whole life carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the relevant building.</p> <p>Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings.</p> <p>Carbon Management Response 28/10/2021</p> <p>Documents submitted:</p> <ul style="list-style-type: none"> • Sustainability and Energy Statement prepared by Buro Happold (dated 28 October 2021, Rev P07) • Sustainability and Energy Statement Appendices prepared by Buro Happold (dated 28 October 2021, Rev P02) • Screenshot of GLA Carbon Emission Spreadsheet, v.1.2 <p>Response Overview</p>	

Stakeholder	Comment	Response
	<p>Two outstanding points were due to be addressed within the amended report: ensuring the Be Lean reduction in emissions meets Policy SI; ensuring the overheating report modelled the overheating risk with the appropriate weather files.</p> <p>Energy Strategy The carbon emission figures stated below have been based on the SAP2012 emission factors (not SAP10 as quoted above). It is worth noting that the updated report only refers to SAP10 carbon factors and that emissions with SAP2012 carbon factors are reported separately in the GLA Carbon Emission Spreadsheet, v.1.2.</p> <p><u>Be Lean</u> The following changes were made to increase the fabric efficiencies and reduce energy demand under Be Lean:</p> <ul style="list-style-type: none"> - Window sizes changed from 2300x110 to 1600x1100 - Reduced u-value for the external walls (high rise) from 0.15 to 0.12 W/m²K - Amended distribution loss factor from 1.1 to 1.05 (in line with SAP default) <p>The Dwelling Fabric Energy Efficiency ranges from 33 to 44.9 kWh/m²/year, with an improvement of at least 4% from the Target Fabric Energy Efficiency.</p> <p>This has resulted in higher carbon savings under Be Lean:</p> <ul style="list-style-type: none"> - Residential: <ul style="list-style-type: none"> o 8% reduction with SAP2012 o From 7% to 11% reduction with SAP10 - Non-residential <ul style="list-style-type: none"> o 16% reduction with SAP2012 o From 10% to 20% reduction with SAP10 <p>Although this scheme should be using SAP2012 carbon factors, and should pass Policy SI2 based on this, it is acknowledged the applicant has achieved further savings within the model by improving the fabric efficiencies for both the residential and non-residential elements. The non-residential elements meet the minimum 15% reduction. The residential falls just short of the 10% reduction, but the scheme is able to meet the policy with SAP10 carbon factors with a 11% reduction. This is considered acceptable having regard to the site's constraints.</p> <p><u>Carbon Offset Contribution</u> A revised carbon offset contribution has been calculated as £1,166,847, assuming the development will connect to the DEN without an interim solution.</p>	

Stakeholder	Comment			Response						
		Site-wide								
	<i>(SAP2012 emission factors)</i>	tCO₂	%							
	Baseline emissions	1,023.1								
	Be Lean savings	80.7	8%							
	Be Clean savings	485.6	47%							
	Be Green savings	84.7	8%							
	Cumulative savings	650.9	64%							
	Carbon shortfall to offset (tCO₂)	372.2								
	Carbon offset contribution (incl. 10% management fee)	£95 x 30 years x 372.20 tCO ₂ /year = £1,060,770 + £106,077 = £1,166,847								
	<p>Overheating The model has been redone with the London Weather Centre files. Updated results are listed below.</p> <p>The mandatory DSY1 weather file for 2020s was passed, based on:</p> <ul style="list-style-type: none"> - Natural ventilation from 22°C, with 100% (bedroom) and 30% (LKD) of openable area at night - Acoustic louvres for noise attenuated ventilation (30% free area) - Ceiling fans - Glazing g-values of 0.35 (low rise) and 0.60 (frosted glass) - Vertical side fins (not clear where) - MVHR with summer bypass - No active cooling - Heat gains of 350W (communal hallways) and 70W (apartment hallways) based on distribution losses of 10W/m - Ventilation rate 1ACH (communal hallways) <table border="1" data-bbox="412 1289 1599 1490"> <thead> <tr> <th data-bbox="412 1289 658 1358"></th> <th data-bbox="665 1289 1144 1358">Number of habitable rooms pass</th> <th data-bbox="1151 1289 1599 1358">Number of habitable rooms pass (with ceiling fans)</th> </tr> </thead> <tbody> <tr> <td data-bbox="412 1362 658 1490">DSY1 2020s</td> <td data-bbox="665 1362 1144 1490">89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 15/16 GY Block D</td> <td data-bbox="1151 1362 1599 1490">89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 16/16 GY Block D</td> </tr> </tbody> </table>				Number of habitable rooms pass	Number of habitable rooms pass (with ceiling fans)	DSY1 2020s	89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 15/16 GY Block D	89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 16/16 GY Block D	
	Number of habitable rooms pass	Number of habitable rooms pass (with ceiling fans)								
DSY1 2020s	89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 15/16 GY Block D	89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 16/16 GY Block D								

Stakeholder	Comment			Response
		19/22 GY Block E 31/33 GY Block F 15/15 GY Block G 149/151 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	22/22 GY Block E 33/33 GY Block F 15/15 GY Block G 151/151 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	
	DSY2 2020s	2/89 GY Block A 1/76 GY Block B 0/15 GY Block C 0/16 GY Block D 0/22 GY Block E 0/33 GY Block F 0/15 GY Block G 1/151 Depot Block ABC 4/11 Depot Block D 7/11 Depot Block E 1/6 Depot Block G	89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 16/16 GY Block D 22/22 GY Block E 33/33 GY Block F 15/15 GY Block G 151/151 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	
	DSY3 2020s	0/89 GY Block A 0/76 GY Block B 0/15 GY Block C 0/16 GY Block D 0/22 GY Block E 0/33 GY Block F 0/15 GY Block G 0/151 Depot Block ABC 2/11 Depot Block D 0/11 Depot Block E 0/6 Depot Block G	89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 11/16 GY Block D 22/22 GY Block E 33/33 GY Block F 15/15 GY Block G 151/151 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	
	DSY1 2050s	61/89 GY Block A 59/76 GY Block B 0/15 GY Block C 1/16 GY Block D 0/22 GY Block E 3/33 GY Block F 0/15 GY Block G 11/151 Depot Block ABC 4/11 Depot Block D 0/11 Depot Block E	89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 16/16 GY Block D 22/22 GY Block E 33/33 GY Block F 15/15 GY Block G 151/151 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E	

Stakeholder	Comment			Response
	DSY1 2080s	1/6 Depot Block G 0/89 GY Block A 0/76 GY Block B 0/15 GY Block C 0/16 GY Block D 0/22 GY Block E 0/33 GY Block F 0/15 GY Block G 0/151 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	6/6 Depot Block G 89/89 GY Block A 76/76 GY Block B 15/15 GY Block C 16/16 GY Block D 22/22 GY Block E 33/33 GY Block F 15/15 GY Block G 151/151 Depot Block ABC 11/11 Depot Block D 11/11 Depot Block E 6/6 Depot Block G	
	Changes from the previous model:	Goods Yard: 4 less hab rooms Block A; 1 less hab room Block B; 33 new hab rooms Block F; 15 new hab rooms Block G. Depot: 1 less hab room Block ABC.		
<p>Updated planning conditions <u>Energy Strategy</u> (a) Prior to the commencement of construction works, an revised updated Energy Strategy must be submitted with Design Stage SAP worksheets based on the approved Sustainability and Energy Strategy by Buro Happold (dated 28 October, P02). The development will achieve minimum carbon emissions savings of 7864% over 2013 Building Regulations Part L with SAP2012 carbon factors, with a minimum solar PV array of 168 kWp on the Goods Yard and minimum 45 kWp on the Depot sites. The revised updated strategy will further respond to outstanding issues as set out in the committee report:</p> <ul style="list-style-type: none"> - Achieve minimum carbon reductions at the Be Lean Stage of 4056% for the domestic new build and 1556% for the non-domestic new build elements (SAP2012 carbon factors); - An air tightness delivery strategy; - Detailed thermal bridging calculations demonstrating how thermal bridging will be reduced; - Set out detailed design of the heat network within the blocks and how this complies with CIBSE CoP1 and the LBH Generic Specification. This should include detailed calculation of distribution losses (based on pipe routes and lengths, pipe sizes, taking account of F&R temperatures and diversification and insulation) to calculate total heat loss from the system expressed in W/dwelling and should demonstrate losses have been minimised; - Set out a strategy for the supply of heat to any phases occupied before the site-wide energy centre is available; - Set out a strategy that ensures a heat can be supplied to the other sites within the High Road West masterplan area via this development site; 				

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> - Provide further detail of how the developer will ensure the performance of the system will be safeguarded through later stages of design, construction and commissioning including provision of key information on system performance required by CoP1. - A metering strategy. <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.</p> <p>The final agreed energy strategy shall 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, SI3, and Local Plan Policy SP4 and DM22.</p> <p><u>Future overheating (residential)</u> Prior to above ground works, an updated Overheating Report that includes modelling of future weather files must be submitted to and approved by the Local Planning Authority. The submission shall assess the future overheating risk and propose a retrofit plan. This assessment shall be based on the Sustainability and Energy Statement (dated 27 May 2021, Rev P05) prepared by Buro Happold. The report shall include:</p> <ul style="list-style-type: none"> — Further modelling of units modelled and the overheating risk with the 2050s and 2080s weather files for central London; — Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation (if any), and which measures will form part of the retrofit plan; — Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment); — Confirmation who will be responsible to mitigate the overheating risk once the development is occupied. <p>Prior to occupation, the development must be built in accordance with the approved overheating measures in line with the Sustainability and Energy Statement prepared by Buro Happold (dated 28 October 2021, Rev P02) and retained thereafter for the lifetime of the development:</p> <ul style="list-style-type: none"> - Natural ventilation, with 100% (bedroom) and 30% (LKD) of openable area at night - Acoustic louvres for noise attenuated ventilation (30% free area) - Ceiling fans - Glazing g-values of 0.35 and 0.30 	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> - Vertical side fins - MVHR with summer bypass - No active cooling <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> <p>Conclusion Based on the clarifications received previously, and the updated information in the Sustainability & Energy Strategy, the scheme now meets the required policies and can be supported in sustainability and carbon reduction terms.</p>	
Conservation Officer	<p><u>Site:</u> The development site is part of the wider High Road West Masterplan for the area, and it is formed by the north-south oriented sequence of two adjoining sites, starting from the south: the triangular-shaped The Goods Yard and the rectangular-shaped Depot site including the land located immediately at the back of grade II listed buildings at 867-869 Tottenham High Road.</p> <p>There are extant consents, consistent with the key development principles of the published HRW masterplan, both on the Goods Yard site, on the Depot site and on the land at the back of listed houses at 867-869 Tottenham High Road.</p> <p>The Goods Yard site was previously occupied by industrial units and was subsequently used as a temporary construction compound associated with the Tottenham Hotspur stadium redevelopment. Some structures and commercial units still stand in the south-eastern corner of the Goods Yard plot. The Depot plot is currently occupied by retail uses and associated car park.</p> <p>The proposed scheme considers The Goods Yard and the Depot site together, including land at the back of listed 867-869 High Road, to be developed as one extensive site which is framed in anti-clockwise order by White Hart Lane to the south, by the railway line running along Pretoria Road to the west, by modern apartment blocks and school to the north and by the Peacock Industrial Estate site. The Peacock Industrial Estate site, which does not form part of this application but will be separately developed as part of the wider Masterplan, lies between the development site and the western edge of the Conservation Area.</p> <p>The southern part of the Goods Yard site, including the locally listed Station Master's House building, falls within the western branch of the North Tottenham Conservation Area.</p> <p>The development site runs in parallel to the top section of North Tottenham Conservation Area which is here comprised between White Hart Lane and Brantwood Road and is characterised by a well-</p>	

Stakeholder	Comment	Response
	<p>preserved listed and locally listed frontage along Tottenham High Road, although due to cumulative and insensitive alterations and progressive erosion of character occurred over the past decades, the whole North Tottenham Conservation Area is now designated as a “Conservation Area at Risk” by Historic England, is in need of sensitively designed improvements and has been undergoing heritage-funded regenerative interventions over the most recent years.</p> <p>This upper part of the North Tottenham Conservation Area, ideally works as a gateway into the linear Tottenham High Road Historic Corridor which starts to the south at Seven Sisters and runs northwards through five contiguous Conservation Areas including Seven Sisters/ Page green, Tottenham Green, Bruce Grove, Scotland Green and the two stretches of North Tottenham Conservation Area. The characteristic features of the Conservation Area, including the variety and quality of its most valuable architectures are defining components of the Tottenham High Road Historic Corridor.</p> <p>The extensive development site includes both grades II listed Georgian Houses at Nos 867-869 Tottenham High Road and the locally listed and currently vacant Station Master’s House at No. 52 White Hart Lane which also falls within the North Tottenham Conservation Area.</p> <p>The entire site is also immediately surrounded by several other heritage assets, with the nearest, such as the Grade II listed The Grange located at 34 White Hart Lane, being all included in the North Tottenham Conservation Area that extends along the High Road and White Hart Lane with its distinctive historic frontages and rich array of locally listed and statutorily listed buildings including Nos 797 and 799 High Road; 819 and 821 High Road; 859-863 High Road all located on the west side of the High Road and the Grade II* listed Dial House, Percy House, the Grade II listed Nos. 792-794, 798-802 and 808-810 High Road forming altogether the Northumberland Terrace and listed houses further to the north at 816-822 High Road.</p> <p>Within short walking distance, to the south-west of the development site, beyond the railway line are located the contiguous Tottenham Cemetery Conservation Area and Bruce Castle Conservation Area which are characterised by their undeveloped, open and soft landscaped appearance and by their leafy, visually permeable boundaries characterised by low walls surmounted by railings, green edges and deciduous trees, and are visually connected to the development site and North Tottenham area through long views across, into and outside each of the Conservation Areas. Just to the immediate west of the Bruce Castle Conservation Area and within a significant distance of about 1 km from the development site, lie both the Peabody Cottages and The Tower Gardens Conservation Area</p> <p>To the north of the development site, along the High Road and beyond the Borough’s boundary are located the Fore Street Angel and Fore Street South Conservation Areas which lie in the London Borough of Enfield.</p>	

Stakeholder	Comment	Response
	<p>Despite the number and quality of heritage assets located in Haringey and surrounding to various degree the development site, both desk-based research and site visits lead to consider the likely significant effects of the proposed scheme on the following most significantly impacted heritage assets:</p> <ul style="list-style-type: none"> • 34 White Hart Lane (The Grange) (Grade II Listed); • Nos 797-799 High Road (Grade II Listed); and • Nos. 819-821 High Road (Grade II Listed); • Nos. 867-869 High Road (Grade II Listed); • North Tottenham Conservation Area; • Bruce Castle and All Hallows Conservation Area • Station Master's House (52 White Hart Lane) (Locally Listed); • Nos. 790 High Road (Dial House) (Grade II* Listed); • Tottenham Cemetery Conservation Area; • Fore Street Angel (Enfield); and • Fore Street South (Enfield). <p><u>Tottenham High Road Conservation Area.</u> Tottenham High Road Conservation Area is a linear Conservation Area within a densely built-up urban setting with an almost intact 19th century townscape incorporating notable surviving examples of earlier periods. The areas immediately to the east and west of the High Road have changed dramatically. Despite these changes the townscape retains a high degree of historical continuity, maintaining a contained linear street pattern forming a sequence of linked spaces and sub spaces, and with a notable variety and contrast in architectural styles and materials. The street width and alignment still follow the form established by the mid-19th century. There are good surviving examples of buildings dating from the 18th and 19th centuries including outstanding groups of Georgian houses and mid and late-Victorian shopping parades illustrating the changes to this building type in scale and style, together with examples of the inter-war style of the mid-20th century.</p> <p>The northern part of the Conservation Area, located immediately to the east of the developments site, is the best surviving townscape section of the High Road, containing some outstanding Georgian architectures as part of a built sequence reflecting changing patterns of development from the early/mid-18th century through the 19th to the 20th century. The buildings of varying ages contribute to a cohesive and contained streetscape due to the general conformity in scale, height and materials together with the variation in silhouette or roofline. The section of the High Road between Brantwood Road and White Hart Lane, however, is the most complete part of the Conservation Area in terms of its surviving historic buildings and townscape form, retaining many Georgian and Victorian buildings with their consistency of scale, height and frontage width.</p> <p>The High Road's northern 'entrance' is defined on the west side by listed buildings Nos. 867-869, an imposing group of early-18th century of houses, and by the Coach and Horses public house opposite, of</p>	

Stakeholder	Comment	Response
	<p>early-19th century origins, which announce the predominantly Georgian character of the northern stretch of the High Road. This short entry sequence terminates with a gap site fronting the timber yard (Nos. 855-863), enclosed by unsightly hoardings, and is marked by the mature street tree on the west side of the High Road.</p> <p>Buildings at Nos 867-869 High Road were listed in 1949 because of their architectural interest, well preserved features and townscape value and have been variously used as offices and internally altered. These architectures offer an opportunity for preservation of their special features of interest and for enhancement of their character as well as use.</p> <p>Despite having lost much of its original houses, White Hart Lane is still significant by virtue of the diversity of its surviving historic buildings which are representative of each period from Georgian through mid to late Victorian up to post-war housing. On the north side, among the surviving terraces of C19 modest houses, stands the locally listed house at No.6a which was originally one of a pair of small houses, partly rebuilt and the front elevation has kept its original brick arch over the front door and the two sash windows beneath flat rubbed brick arches.</p> <p>On the same side of the street stands as a building of special interest the grade II listed The Grange at Nos 32-34. It is a mid-18th century house with two wings added to either side in the early to mid-19th century. The house has been restored and has a fine elevation in brown brick with red brick dressings including the rubbed-brick arches over the windows and a good pedimented door case. The later extensions to either side are in a yellow stock brick and have elliptical arched openings deriving from their probable origins as stable and coach house.</p> <p>Another building of interest on the north side is the locally listed Station Master's house, a detached two-storey house that was erected at No 52 White Hart Lane following the opening of White Hart Lane station in 1872. This is a yellow stock brick house with gauged brick flat arches over the sash windows and a slate roof. The high stock-brick wall on the frontage also appears to be original.</p> <p>On the south side of White Hart Lane, the grade II listed house at No. 7 is a villa dating from c1840 that is set back from the road with steps up to the front door. The building is rendered with incised stucco, and the sash windows together with the panelled front door with fanlight could all be original. The house has been recently refurbished and strongly contributes to the special interest of this part of the Conservation Area.</p> <p>The section of White Hart Lane which falls within the Conservation Area and is comprised between the High Road and the railway station, nowadays reads as a fractured and incomplete townscape due to the loss of many original C18 houses which have been replaced by smaller C19 terraced houses. On the north side, the former gardens of the original villas have been filled in with industrial uses.</p>	

Stakeholder	Comment	Response
	<p>The south side consists of post-war public housing set well back from the street giving an open aspect to the frontage.</p> <p>At the northern end of the Conservation Area, views north and south from Brantwood Road illustrate the open character looking north, contrasting with the enclosed character of the High Road looking south. Views of the Conservation Area along the linear form of the High Street, in both directions are especially important to read the urban and architectural quality of the area. Views in and out of the Conservation Area from junctions with side roads and from some passageways and alleys also contribute to the experience and understanding of the character of the area.</p> <p>Views from the side streets such as Northumberland Park and White Hart Lane each illustrate a distinct change in scale and character from that along the High Road.</p> <p>Key features of the Conservation Area which need to be preserved and enhanced include its most important and original buildings, the historic linear continuity of buildings either side of the High Road, the established character of the townscape and its sense of spatial sequence highlighted by the mix of Victorian and Georgian buildings that help to give the street its scale and sense of place.</p> <p>The Masterplan promotes retention and enhancement of the historic character of the High Road together with the adaptable reuse of historic buildings and forms, key views and vistas through the area. The development site provides, in line with the vision set out in the Masterplan, an opportunity to enhance both the heritage buildings which will be retained on site, their setting and to improve the setting of the North Tottenham Conservation Area.</p> <p><u>Proposal:</u> It is proposed to demolish the existing buildings and structures so to redevelop the site with a residential led mixed-use scheme with building heights ranging from 6 to 32-storeys and to provide 867 new homes, flexible commercial, business, community, retail and service use with associated parking and hard/soft landscaping, ancillary space, creation of a new public park and a series of private open spaces. It is also proposed to retain and restore the listed buildings at 867-869 Tottenham High Road to reinstate the original residential use and to adaptively restore the locally listed Station Master's house at No 52 White Hart Lane to be converted into a flexible retail, food and beverage use.</p> <p><u>Comments:</u> The principle of redevelopment of the site and the erection of tall buildings along the railway line is accepted and underpins both the Masterplan for the wider area as well as the extant consents for the Goods Yard and Depot which respectively allow to create a mixed use development ranging in height from 3 to 8-storeys plus two residential towers of 18 and 22 storeys stepping up in height from south to north on the Goods Yard plot and a mixed use development with a 29-storey tower to the north, a part 7 and part 9-storey building to the north with the remaining buildings ranging from 6 to 3-storeys and stepping down towards the High Road on the Depot plot.</p>	

Stakeholder	Comment	Response
	<p>These are the approved heights within the context of the average 1-3 storeys of the heritage buildings which characterise the Conservation Area and the historic frontage of Tottenham High Road.</p> <p>The development site is undoubtedly complex, and the proposed scheme has been developed at a relatively fast pace in discussion with the Council Officers and other relevant stakeholders through a design-led approach which aims to provide a bespoke and coherent design response to the whole site and its heritage context based on the parameters established by the High Road West Masterplan and existing planning permissions. The layout of the proposal is acceptable in principle and the increase in new open space is supported as it contributes to the sensitive integration of heritage assets into the scheme design.</p> <p>The development proposal has been successfully informed by a thorough site analysis, contextual analysis and understanding of the various heritage assets affected by the proposed development and responds to the principles of the adopted Masterplan so to ensure that the site can be developed and successfully used compatibly with future development proposals affecting the neighbouring land as part of a whole new area.</p> <p>The pre-application discussion has allowed to achieve an appropriate massing, layout, and height rationale for the group of tall buildings identified within the Masterplan, to provide an appropriate urban grain and sense of enclosure for the public and private uses, to develop a distinctive context driven architectural response recognising the site's rich history and heritage assets. Scale and massing are derived from the principles set out within the Masterplan and have been tested against the existing and emerging townscape and heritage context to assess impact on the existing historic buildings and Conservation Area. The proposed scheme cumulatively considers the emerging context and the extant planning consents while the proposed site layout and street design aim to frame key vistas into the sites from the High Road and White Hart Lane edges and to reinforce movement patterns and access to public according to the masterplan's principles with regards to views and vistas.</p> <p>A balanced assessment of constraints and opportunities, including heritage sensitivities and enhancement opportunities underpins the design process along with the necessary design exploration to create a coherent, legible, and permeable new neighbourhood, well connected with its immediate setting, characterised by high quality open public and communal amenity spaces and designed to respect and unveil key heritage assets, local character, and townscape views.</p> <p>The objectives of the proposed scheme are clear and include, among others, the creation of tall landmarks along the railway line and the retention and integration of the heritage buildings with the new development to unveil their presence along the High Road and White Hart Lane. The proposed parabolic composition of the three slender towers is the result of an intense pre-application discussion which has led to the elimination of a fourth tower originally located to the southern section of the development site – this tower was too close to the Conservation Area and to the Locally Listed Station</p>	

Stakeholder	Comment	Response
	<p>Master's House- and to the reduction of the overall height of the remaining towers. The proposed triplet of towers is intended as a characteristic feature of the new development and aims to create a distinctive landmark feature for the new town along the railway line.</p> <p>By virtue of the detailed design and guiding conservation-led approach to new development, the overall relationship between the proposed scheme, especially its lower buildings and nearby heritage assets is largely positive.</p> <p>The scheme offers indeed an interesting design strategy to protect and enhance the setting and significance of the heritage assets within and around the development site by creating a range of residential typologies and varying heights as a nod to the organic growth of the historic town and to generate an attractive and welcoming neighbourhood which forms a desirable place to live and work. The proposed scheme has been developed as a sequence of attractive and recognizable character areas which complement the character of the adjacent heritage assets and are populated by a range of building typologies to create both a distinct and coherent identity. The design proposal seeks to integrate the new buildings with the heritage buildings and the wider Conservation Area through the formation of new buildings and places designed to mediate between the scale and height of heritage assets and the mid-rise and tall buildings further into the site as well as through the creation of heritage gateways to the site such as the group comprised of Station Master's House, Block G and H within the Goods Yard plot and the new blocks surrounding listed 867-869 High Road within the Depot plot.</p> <p>The design of the White Hart Lane gateway building has been conceived to bring together the surviving heritage assets along white Hart Lane by aligning with the façade of the Station Master's House while revealing the full flank of 'The Grange' so to contribute to repair the street frontage of the Conservation Area along White Hart Lane.</p> <p>The north-eastern entrance to the site from the High Road has been designed as a traditional street, characterised by mature trees and dominated by the fully restored Georgian houses at 867-869 High Road, sitting just on the northern edge of the North Tottenham Conservation Area. The proposed new blocks are well set back from the High Road so to retain the visual prominence of the listed houses and mature trees.</p> <p>However, it is important to note that the unitary development of previously separate sites is mainly aimed at making best use of land, to optimise the capacity of the site and improve overall amount of open and public space with the risk of imposingly try to signpost and define a larger, much more dense and imposing development with a composition of tall buildings powerfully sitting just on the doorstep of the historic town and its listed buildings.</p> <p>Indeed, while the proposed scheme aims to improve and refine the design response to the specific qualities of the wider site and its context it also increases the quantum of residential and non- residential</p>	

Stakeholder	Comment	Response
	<p>floorspace and provides greater public space such as the proposed public Peacock Park within the Depot site, which translates into 8 new blocks ranging in height from 3 to 7 storeys plus two towers of respectively 27 and 32-storeys from south to north on the Goods Yard plot and 6 new blocks ranging in height from 5 to 9 storeys plus a large tower of 29 storeys to mark the Depot site.</p> <p>This means that, in order to increase the residential quantum, and despite the ambition to provide a bespoke and sensitive design response to the various parts of the site, to its heritage buildings as well as to the surrounding Conservation Area, the result of this wider scheme is that the height, perceived prominence and visual impact of the proposed three landmark towers is greater than in the previously consented scheme.</p> <p>It is acknowledged that in principle tall buildings are considered appropriate on the proposed site and that the proposed group of towers is ideally meant to be a defining design feature which accords with the linear characteristic of the Conservation Area and provides visual rhythm to the new development and its area, but despite their relative distance from the Conservation Area and heritage buildings, despite the carefully designed spacing between towers and the carefully designed urban composition, the proposed towers visibly loom above and behind the small scale heritage assets, especially in views along and towards Tottenham High Road and White Hart Lane.</p> <p>The positive effects deriving from the repaired street frontage along White Hart Lane and from the valorisation of the settings of the listed Station's Master's House are somewhat diminished by the dwarfing effect caused by the excessive height of especially the southern towers standing just behind the Station's Master house as clearly shown in view 24 where the gradual increase in height, one floor at a time, of the proposed buildings is abruptly interrupted by the 27 storey tower.</p> <p>The Visual Impact Assessment that accompanies this development proposal clearly illustrates the concerning effects of the proposed scheme on the local and wider townscape: the proposed scheme has been thoroughly tested in views across and into the Conservation Area and especially views 4 (High Road, near Whitehall Street); 5 (High Road, next to Percy House); 6 (Northumberland Park, east of High Road); view 25 (William Street, by White Hart Lane) clearly show how the proposed towers, while creating a new, characteristic landmark composition that signposts the new neighbourhood, at the same time dominate in views of grade II listed The Grange and in views of the historic frontage of North Tottenham Conservation Area, as shown in views 4,5,6, 10 especially due the excessively intricated façade treatment and visual prominence of the tallest central core of the three towers.</p> <p>The same considerations apply to the views of nationally important grade II Listed 867-869 Tottenham High Road, grade II 797 & 799 and 819-821 High Road, and grade II* Dial House which would all be negatively affected by the overwhelming presence of the proposed towers although this negative impact would lead to less than substantial harm to the significance of the listed buildings.</p>	

Stakeholder	Comment	Response
	<p>Also, the locally listed Station Masters House would be overwhelmed by the prominent towers in views taken along White Hart Lane and this would lead to less than substantial harm to the significance of the locally listed building.</p> <p>The proposed towers would undesirably dominate also in views of the development site taken from Bruce Castle Conservation Area and Tottenham Cemetery Conservation Area.</p> <p>Bruce Castle and All Hallows Conservation Area has considerable historic and architectural significance and includes three important historic buildings – Bruce Castel (Listed Grade I), All Hallows Church (Listed Grade II*) and The Priory (Listed Grade II*). The applicant’s assessment suggests that the existing Rivers Apartments tower located to the north-west of the development site and outside the Conservation Area, is already seen from the park and that the proposed scheme would not bring about a particularly noticeable change to the perception of the urban setting of the park. This position ignores that the proposed towers, especially the Goods Yard towers would very uncharacteristically stand out and be prominent features when viewed from the open spaces in the Conservation Area, which is characterised by its openness, landscaping in the park and small-scale development in long views. It is our opinion that the proposed development would dominate the surrounding of the Conservation Area and would negatively impact on its experience.</p> <p>Tottenham Cemetery Conservation Area is similarly impacted by the tallest elements of the new development since the proposed towers, especially those standing on the Goods yard site, would uncharacteristically dominate in the views across the Conservation Area, especially those views taken from the northern section of the Tottenham Cemetery which is characterised by open spaces, landscaping in the park and small-scale development in long views. It’s therefore felt that the proposed tall buildings would cause ‘less than substantial harm’ to the setting and significance of this Conservation Area.</p> <p>It is interesting to observe that the heritage impact assessment for the approved Goods Yard application tested the same assets currently assessed and came to similar or even less positive conclusions to those drawn in respect of the current, significantly taller scheme.</p> <p>Also interesting that the assessment of impact in relation to the Bruce Castle and Tottenham Cemetery Conservation Areas was that “The remaining Conservation Areas within the Study Zone will not be significantly affected by development on this site, because their identified characteristics and sensitivities do not include wider views, and the Proposed Development will be screened from within the Conservation Areas.”</p> <p>The assessment of the approved Goods Yard scheme quite arguably rested on the assumption that little of the approved scheme was visible from within the Conservation Areas and that these areas are very inward facing and screened by densely vegetated boundaries and the new development wasn’t visible</p>	

Stakeholder	Comment	Response
	<p>from key spaces or in key views. Indeed, the approved Goods Yard scheme was only tested at the time in one view from Bruce Castle Park and one view from Tottenham Cemetery.</p> <p>As part of the current development proposal both council officers and applicants have visited and analysed in depth the characteristic features and experiential quality of these Conservation Areas and have been able to appreciate how especially the Bruce Castle Park and the northern section the Tottenham Cemetery are large, landscaped areas with a high level of public fruition and with a good degree of visual connection with the surrounding mainly low rise, traditional built environment that significantly constitutes the visual background of views across the Conservation Areas and therefore significantly contributes to the peaceful, open and landscaped character of the Conservation Areas.</p> <p>Current view 16 clearly shows the imposing of the proposed towers in views across the Bruce Castle Conservation Area where the trees and nature in general is the domineering, tallest element that blends in with the sky above. Existing buildings appear in the view as subordinate to the landscape, are not imposing architectural gestures such as the tall towers, and in the light of these considerations it is very difficult to accept the position of the applicant's heritage statement that this view across the Conservation Area are not significant just because these are not marked up in the adopted Conservation Area Appraisal, as this would totally ignore that the whole experience of the Conservation Area is a dynamic one and depends on what we see and perceive when we move throughout the area, and view 16 is taken from a junction of paths which lead from the park playground to the northern access to the park, so it's not a secondary or negligible viewpoint in the experience of the park and Conservation Area.</p> <p>Submitted views 18, 19, 20 respectively show how the new development will be uncharacteristically and prominently visible across the northern section of the Tottenham Cemetery, a place of prayer and peace, but also a public space for families and children where the current views are those of the graveyards, rich vegetation, trees and the sky. It is again difficult to accept the applicant's position that the development retains the character and appearance of the Conservation Area and has no or minor effect as suggested in the submitted reports.</p> <p>The current scheme also includes a different and more detailed contextual proposal from the approved one for conversion and extension of the Station Master's House. The extant permission allows for a rear single-storey extension to provide space for future kitchen and bar facilities as part of its change of use to a restaurant. scheme proposes a smaller rear single-storey extension, a separate small refuse storage building and alterations to the building's elevations to provide a dining space as part of the change of proposed use as restaurant/café. The proposed scheme is welcome as it would have a beneficial effect on the locally listed building and will bring it back into beneficial use, however the towers located immediately in the background of the locally listed buildings would dominate in views of the Station Master's House due to their strikingly difference from the proportions of the restored setting of the Master's house along White Hart Lane.</p>	

Stakeholder	Comment	Response
	<p>Grade II* Dial House, located at 790 High Road is the bookend house to the highly significant Northumberland Terrace, as a prominent and valuable corner building in the Conservation Area it benefits even more than others from the well-preserved urban scale and architectural quality of its immediately surrounding stretch of High Road and the proposed Goods Yard towers would definitely dominate in those views of the historic frontage of North Tottenham Conservation Area taken from Dial House, submitted northwards looking views of the High Road show how the proposed towers, especially those on the Goods yard site, would partially obscure the legibility and primacy of the continuous historic roofscape along the west side of the High Road and would loom above the historic buildings views from Dial House, thus adversely affecting the contributing setting of this important building.</p> <p>Although it is acknowledged that the proposed towers as seen on their own successfully read as a unitary group composition tied together by coherent elevational treatments and materiality, and provide positive additions to the skyline when viewed with the existing River Apartments, although the careful design of the application scheme as revised would read well in long-distance views, when considered in the immediate context of the North Tottenham Conservation Area and its listed buildings, their presence in the visual experience of heritage assets is in some cases overwhelming depending on the view points from where the Conservation Area and its heritage asset are experienced.</p> <p><u>Conclusions and Recommendations.</u> The proposed scheme has been carefully thought through and offers great potential for enhancement of both 867-869 High Road, Station Masters' House and related setting as it seeks to retain, reveal the significance and secure the future of the Grade II listed 867-869 High Road and locally listed Station Masters' House while fully integrating these buildings within the new development that will enhance the appearance, character and setting of both the heritage buildings and Conservation Area. However the tested views of the proposed scheme in the context of heritage assets show that due to the uncharacteristic and excessive height of the proposed towers, especially the southern towers located on the Goods Yard site, the proposed scheme would negatively impact on the setting of both locally and nationally important heritage assets in a number of views as discussed in detail above and this would lead to a level of harm at the mid-range of 'less than substantial' affecting a number of designated and undesignated heritage assets and the public benefits associated with the application will need to outweigh this harm according to the tests set at paragraphs 196 and 203 of the NPPF.</p>	
Design Officer	<p><u>Summary</u></p> <p>These proposals are a well thought through and elegantly designed response to a significant site. The masterplan and layout represent an improvement on the existing adopted masterplan, with a clear, legible street network and an enlarged park, and improvements on the approved hybrid schemes for each of the individual Goods Yard and Depot sites, particularly the former. The proposed street layout is particularly improved on the Goods Yard site, where</p>	

Stakeholder	Comment	Response
	<p>the single sided street proposed in both adopted masterplan and previous approval to run alongside the railway edge is moved into the site, with a more legible, direct and welcoming entrance off White Hart Lane and the potential for active frontage along both sides. Streets within the development are generally lined with good quality, well-designed low and medium rise mansion blocks providing an appropriate transition from the retained existing buildings along the High Road and White Hart Lane to the taller blocks.</p> <p>The proposed mix of heights include three tall building at 27, 32 and 29 storeys; this is successfully justified in accordance with Haringey policy. In particular, the detailed design of the three towers represent a tremendous improvement on the illustrative schemes in the previous hybrid approvals, are legible and sculpturally interesting in longer views, connect well to the ground and their entrances whilst having clear separate base, middle and top and enclose good quality homes. Views of the development show it would generally not be any more detrimental than the existing and previously approved tall buildings, and by completing the intended row of tall buildings along the railway edge, be in accordance with the previously approved masterplan.</p> <p>All the Quality Review Panel (QRP) concerns raised with the proposals have been successfully resolved. Communal entrance doors are all now designed to be clear, legible and inviting, all flats have good aspects, outlooks and private amenity spaces, with balconies or terraces always available off living rooms and designed to provide privacy and hide residents' clutter. The proposals have also been successfully shown to not have any significant detrimental effect on existing neighbours, considering that this has long been planned for major change, with the High Road West Masterplan Framework developed in 2014. Daylight, sunlight and wind assessments show only minor effects compared to the expectation of development previously agreed.</p> <p><u>Principal of Development, Masterplanning and Street Layout</u></p> <ol style="list-style-type: none"> 1. Notwithstanding the weight of council policy emphasising that only comprehensive development of the whole of this allocation site is sought, this application builds on two previous approvals; for the Goods Yard site and (what is now known as) The Depot site, which together cover the whole of this application site. The planning inspector who granted the appeal on the Goods Yard site concluded that as proposals were in accordance with the adopted Masterplan Framework, and the Council took the same view on the subsequent application for the 867-879 High Road, now known in this application as "The Depot". 	

Stakeholder	Comment	Response
	<p>2. This proposal, therefore, in amending those two previous approvals, takes them closer to the principle of masterplanning, tying the two sites more closely together in street pattern and building form, particularly in the heights of the taller buildings.</p> <p>3. These proposals particularly improve on the existing approvals and the existing adopted masterplan in the street layout of the Goods Yard element, by moving the main north-south street of this part of the development away from the western boundary, where it was to run alongside the railway edge, creating a one-sided street lacking the usual animation. This allows the buildings, including the taller blocks, to be moved up to the railway edge, buffering the railway noise more completely from the rest of the wider development site. Being next to the railway and its wooded embankments, the tall buildings have less impact on sensitive neighbours. It also matches the arrangement in both the approval on the Depot site but also the built Cannon Works site immediately to the north with their tallest buildings against the railway edge.</p> <p>4. The new main north south street of the Goods Yard element is now proposed to run along the eastern edge of the applicants' site, on the western boundary of the Peacock Industrial Estate, in different ownership but also part of the site allocation and adopted masterplan, so therefore also expected to be redeveloped in the short term. To demonstrate this is possible and viable, the applicants include a masterplan showing how the Peacock site could be redeveloped with blocks of similar height. The applicants have committed to permit blocks on the Peacock to open off this new north-south street. Whilst in the short term this development, if built before anything on the Peacock, would have residential and commercial properties on the west side of this street facing the blank back wall of the Peacock, it can be expected to soon become a two-sided street with active frontage and front doors on both sides. This new north-south street also connects better at either end, via small squares to resolve the alignment; at the southern end the small square allows the small dogleg to the west, onto a direct street off White Hart Lane between the two buildings of heritage, The Grange and Station Masters House. At the northern end a second small square allows a short east-west street, hard against the northern boundary of the Peacock, to link into the park proposed in the masterplan and approved layout of The Depot.</p> <p>5. The street layout of The Depot is essentially unchanged, with its primary connection being to the High Road as a continuation of Brantwood Road, forming a crossroads. Streets continue to connect to the Cannons site to the north at the north-eastern and north-western corners of the park. The masterplan in this application shows the east-west street at the northern edge of the Peacock site could be continued directly eastwards through to</p>	

Stakeholder	Comment	Response
	<p>the High Road via another part of the site allocation likely to be redeveloped, currently a timber yard, whilst two further east-west streets on their masterplan would connect the southern square and the pocket park / entrance court to their southern tall building with the two existing narrow alleys off the High Road; Percival Court and Brunswick Square. The potential for the park to be directly connected to White Hart Lane via a second north-south street to the east of The Grange remains on the masterplan but is also outside this applicants' ownership.</p> <p>6. Whilst the key north-south street of the development contains two doglegs, preventing it being the <i>ideal</i> direct route, this layout aligns well with land ownership and creates developable plots both within this applicants' ownership and on the rest of the site allocation. It is also a more direct and less convoluted north-south route than in the adopted masterplan and approved scheme for the Goods Yard. At the northern end, on The Depot, the direct connection of that site's main east-west street with the desired landing point of a footbridge over the railway becomes somewhat less direct, with the applicants' provision for the bridge instead landing in their northern square. The desire for a bridge is only an aspiration, but if delivered within this application's masterplan, the east-west connection would be <i>marginally</i> less direct, but the connection south-eastwards would be improved. Until the bridge can be delivered, this layout removes the dead-end element of the east-west street in The Depot. As a whole, this application represents a considerably improved street layout in a logical and coherent masterplan consistent to the spirit of the adopted version.</p> <p><u>Form, Bulk & Massing</u></p> <p>7. Across the site, bulk and massing increases with height from the smallest, most fine grained and lowest rise buildings on the High Road at the eastern end of the Depot site and the southern end of the Goods Yard site, where in both cases retained existing buildings of significant heritage value face the main existing streets of the High Road and White Hart Lane, to the most dominant bulk of the highest rise blocks, embedded into podia and lower rise shoulder wings tying them into the wider grain, within this application site and the masterplan, of mansion blocks lining the streets and squares of the development. These mansion blocks rise from three and four storeys immediately beside and behind the retained buildings on White Hart Lane and the High Road to five, six and seven storeys, with Depot Block B, which forms a shoulder to the northern tower on the western edge of the park, rising to 9 storeys. This is a very reasonable range of heights for the proposed low to medium rise elements of the proposal.</p>	

Stakeholder	Comment	Response
	<p>8. That the tallest lower block, Block B of The Depot, is facing the park, a reasonable proposition, having a large open space in front. It suggests, as is shown in their masterplan, higher buildings on the west side of the park, with 6 storeys on the east side. This suggests the park will have the best sun in the morning and early afternoon, but creates more viable potential development on the main remaining neighbouring site, the Peacock Estate, despite the remaining sites not being suitable for tall buildings, 9 storeys being the absolute maximum height accepted anywhere else within the site allocation north of White Hart Lane.</p> <p>9. In form, these lower rise elements line the proposed streets squares and park, defining street edges and corners, in a block pattern, but avoid continuous walls of buildings by leaving gaps between, creating glimpses into courtyards and podium gardens. This allows better day and sunlight access to streets, squares and courtyards, and allows intriguing glimpses, and breathing space to retained existing buildings, notwithstanding that these gaps are gated where they are not podia, preserving clear definition of public and private space. In form, bulk and massing of the lower storey elements, the QRP considered the proposals to be broadly acceptable.</p> <p><u>Tall Buildings, especially Height, Form and Composition</u></p> <p>10. Three tall buildings are proposed, of 27, 32 and 29 storeys, arranged from south to north, along the western, railway, edge of the site. Here the railway sits on an embankment, wooded on both sides, and the building blocks, containing the tall buildings, are set back from the boundary to allow a landscaped strip, so that the nearest existing houses west of the railway are over 40m away and separated by the embankment and its trees.</p> <p>11. The three tall buildings will form a row, with the existing River Apartments tower just to the north forming a fourth. The plan of each tower is strongly aligned north-south, around 40m wide (north-south), but under 20m deep (east-west), and chamfered in plan to accentuate their slenderness from the north and south, whilst the gaps between each, including to Rivers Apartments, is each around 30m. The applicants have been able to show this avoids “coalescence”; the effect of views of the towers merging together as they overlap, except in a narrow cone of views from the south-south-west and north-north-east, directions where there happen to be relatively few sensitive viewing points. The main views will be from the High Road to the south and north, Northumberland Park to the east, and from White Hart Lane and Tottenham Cemetery to the west, in all cases from where they will be clearly separated.</p>	

Stakeholder	Comment	Response
	<p>12. From the east and west, the row of 4 towers form a “curve”, specifically a “double curve” formed by each tall building having taller and slightly lower elements forming a “top” or crown to the tall building. These curves inscribe a rise from White Hart Lane, through the southern tower (Goods Yard Block B, through the tallest tower (Goods Yard Block A), the slightly lower third tower (Depot Block A), to Rivers Apartments.</p> <p>13. Considering each criterion from Haringey’s tall building policy is set in SP11 of our Strategic Polices DPD (adopted 2013 (with alterations 2017) and DM6 of our Development Management DPD (adopted 2017), skipping the 3rd & 4th bullets from the Strategic Policies, that reference the other document and the document used in preparing DM6:</p> <ul style="list-style-type: none"> • The site is within the areas of both the adopted Tottenham AAP and the adopted Masterplan Framework. Both support the principle of tall buildings in this location. The adopted Masterplan Framework established in 2014 a principle that it would be acceptable to have a row of five tall and taller buildings alongside the edge of the railway in the High Road West area of North Tottenham, with the height of those towers dropping away to prevailing existing heights two – four storeys) at White Hart Lane and rising in height north and south. The Masterplan Framework suggested the row of towers north of White Hart Lane should rise to a highest tower at the northern end of the redevelopment area the then Canon Rubber Factory site. As it happened, that site was built out first, being completed in 2015, with its highest block, River Apartments, at 22 storeys. Since then, housing targets, density expectations and public transport accessibility have improved and it is therefore suggested heights could increase, and that it would not be out of place for the row of towers to rise higher in the second and third towers and then drop away; • The council prepared a borough-wide Urban Characterisation Study in 2016, which supported tall buildings in this location, right beside the railway edge, well away from the High Road with its sensitive heritage, dropping in height closer to White Hart Lane. The Characterisation Study recognises that the railway forms a significant barrier and buffer between the two sides, with the west side a much quieter, and therefore lower rise neighbourhood than the east, as well as the railway corridor being at its widest beside this site, giving a much greater distance of 40-70m, with the broad, wooded embankments providing further buffering between the two areas; • High quality design especially of public realm is considered above in paras. 1-9, the protection of views below in paras. 18-20. Heritage assets and their settings are covered by the Conservation Officer’s comments; 	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> • They will be capable of being considered “Landmarks” by being wayfinders or markers within the masterplan , closing vistas of the east-west streets, the main north-south street, marking the new development with its new park from the south, west and east, and marking White Hart Lane station from the north; • They will also be capable of being considered a “Landmark” by being elegant, well-proportioned and visually interesting when viewed from any direction as discussed below; • Consideration of impact on ecology and microclimate encompasses daylight, sunlight and wind, examined in detail from para. 25 onwards, which explain the impact is not significant. Impact on ecology could also include impact on the flight of birds and other flying creatures, but this is only likely to be relevant adjacent to open countryside, a large open space or open waterway, which this is not; • The proposed tall buildings will be in <i>some</i> proximity to the built River Apartments, but this is by design to produce an intended effect of a row of tall buildings. They will be sufficiently far apart though, at around 30m from each other, and are slender in width east-west, to avoid detrimental effects of proximity and in any case are a line of aligned, north-south proportioned towers; there would be no canyon effect as their short sides would be the ones facing each other; • And the urban design analysis and 3d model views of their proposal satisfactorily shows that the towers could be a successful and elegant landmark, creating the planned row of tall buildings. <p>14. The detailed design of the three towers has undergone extensive revision and refinement, in conjunction with numerous workshops with Officers, during the course of this application. The principal concept for the composition of the proposed towers was of a core and two cloaks of contrasting materials, colours and fenestration, so that when viewed from the east and west, where they would be at their broadest, each tower would take on the appearance of three slender elements rather than one fat element. The two cloaks would also start higher, only from above the podium and/or shoulder blocks, and finish lower than the core; the core would then form a distinctive base and top, contrasting with the cloaks’ middle. Aligning the entrance with the core in some instances further demarcates and celebrates their entrances, and the differences in height, of 2-4 storeys, echoes the single storey difference in height of the different elements of River Apartments in the “curve” mentioned above.</p>	

Stakeholder	Comment	Response
	<p>15. For the design to be successfully “read” in more distant views, there has to be a significant contrast between the cloaks and core. However, it would not be desirable for the proposals to consist of too many sharply contrasting, discordantly differently coloured and garish elements. The initial proposal was for each tower to be in a sharply contrasting, different colour; in terracotta orange, a vivid green and rich blue, from south to north, with the cores in each tower white. The colours would come from glazed ceramic cladding, in complex moulded forms creating a finely detailed frame. This could look spectacular close-to, but in the design of tall buildings, more distant views are more relevant, as they are more likely to be experienced.</p> <p>16. Therefore, the detailed design and colours of the proposed cladding and the patterns of the proposed fenestration have been significantly amended to much better express the intended composition. The ceramic areas of cladding have been simplified and broadened out to create a greater expanse of colour to contrast more with the framed, skeletal form of the core, and the colours have been simplified so each tower has a similar tone of terracotta to contrast with the white-grey core, and the base of the cloaks have been raised slightly above the plinths/shoulders to create a shadow gap. The effect is that they are a family of towers, in complimentary earthy tones, made up of sharply contrasting core and cloaks that accentuate their slenderness and disguise their broadness, and read clearly in more distant views, with a clearly distinguishable base, middle and top, entrance, body and crown.</p> <p>17. Therefore, the proposed tall buildings are considered appropriate in this location, legible as landmarks and as part of a wider composition, striking and distinctive in design, in support of meaningful aspects of the design and of high-quality architectural design capable of being seen as beautiful.</p> <p><u>Local, Wider & Strategic Views</u></p> <p>18. London and Borough Strategic View Corridors all happen to be distant from this development, and therefore are not considered to be affected by this development.</p> <p>19. A series of 31 locations for Local and Wider Views of the proposal were agreed between Council Officers and the Applicants team early in the pre-application process. The applicants have included images of all the views showing the scene now, the view with just this scheme added, the view also with other approved schemes (the Tottenham Hotspur Stadium and associated developments) and the view also with the adopted masterplan, and even of other neighbouring developments on the drawing board (the Lendlease “High Road West” scheme). It also needs to be borne in mind that the two previous applications</p>	

Stakeholder	Comment	Response
	<p>approved for this site included tall buildings; for the Goods Yard not to this height but to the same height for 867-879, now known as The Depot, and these were assessed as part of those applications and found acceptable. It is therefore relevant to compare the views of this proposal with views of already approved proposals for this site,</p> <p>20. The views demonstrate that this proposal would not be visible in many sensitive views, and in those where it would be visible, the three new towers would be seen alongside the existing River Apartments tower, and/or the other approved towers would already be visible. In general, their impact would therefore not be detrimental to views where other taller buildings can already be seen, except that it would help turn those into a coherent row of tall buildings, fulfilling the wayfinder or marker function mentioned as one of the advantages of the proposal noted above.</p> <p><u>Residential Quality (flat, room & private amenity space shape, size, quality and aspect)</u></p> <p>21. All maisonette, flat and room sizes are designed to comply with or exceed minima defined in the Nationally Described Space Standards. This is as is to be routinely expected.</p> <p>22. All dwellings (excepting flats converted from the listed nos. 867 & 869 High Road, as previously approved) meet or exceed the private external amenity space in the London Plan, with private gardens, balconies or roof terraces. Privacy of amenity space is achieved by most balconies being recessed, and those that are not being at least partially solid balustraded. All flats have balconies off their living rooms, although some also have second balconies off a bedroom. Many flats have larger roof terraces, exploiting the design which permits roof terraces in the steps, on the roofs of shoulders or on podia.</p> <p>23. There are no single aspect north facing flat in the whole proposed development. There would be some single aspect south facing one bedroom flats, but no south facing larger single aspect flats; this is a reasonable outcome for a higher density urban scheme where some of the blocks are inevitably aligned to an east-west street, and they are designed with passive solar shading and natural ventilation showing in the applicants' assessment they would not suffer overheating. All other flats and maisonettes are at least dual aspect, many triple aspect, an exemplary achievement in such a high-density urban development.</p> <p>24. There is also access to doorstep private communal amenity space, including doorstep playspace, within the development. Many blocks benefit from a private roof terrace, set-in from the sides and screened from neighbouring existing dwellings but providing a large area of amenity space, including an area with informal play equipment. The development</p>	

Stakeholder	Comment	Response
	<p>has access to the central park, which will also contain older childrens' play, large lawns, seating and planting.</p> <p><u>Daylight, Sunlight and Wind Microclimate</u></p> <p>25. The applicants provided Daylight and Sunlight Reports on levels within their development and the effect of their proposals on relevant neighbouring buildings, prepared in accordance with council policy following the methods explained in the Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (2nd Edition, Littlefair, 2011), known as "The BRE Guide".</p> <p>26. Their assessment finds good levels of daylight and sunlight achieves throughout the detailed parts of the proposed development, with 81 and 80% of habitable rooms (177 out of 220 & 176 of 220 rooms) meeting the daylight levels recommended for average daylight factor (ADF) and daylight distribution respectively, and 89% of living rooms (57 out of 64) meeting sunlight levels. Those that fall short all fall marginally short, by a few fractions of a percent, for instance with all Living/Dining/Kitchens that do not meet the 2% recommended ADF for kitchens achieving 1.5% which is the recommendation for living rooms.</p> <p>27. In the case of higher density developments, it should be noted that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London, the Mayor of London's Housing SPG acknowledges. In particular, the 27% VSC recommended guideline is based on a low-density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Therefore, full or near full compliance with the BRE Guide is not to be expected.</p> <p>28. There is no assessment on neighbours as there is no change likely to existing residential neighbours that will be different to the approved schemes. This is because the only close neighbours are the housing on the former Canon Rubber Factory site, including Rivers Apartments, which are immediately to the north of the parts of The Depot site that are unchanged from the approved scheme.</p> <p>29. To assess the impact of the proposals on wind microclimate, the applicants carried out wind tunnel testing of a physical model and measured the findings against long term wind statistics applicable to the site, in accordance with the industry standard "Lawson" criteria. Their assessment finds that the proposed towers will cause significant downdrafts and</p>	

Stakeholder	Comment	Response
	<p>tunnelling of wind along the ground at the northern square, the north-west corner of the park and close to Rivers Apartments. The applicants have therefore designed their landscaping plans to include a substantial area of landscaping at these locations, that would mitigate this downdraft effect, and allow safe conditions in building entrances and pedestrian areas.</p>	
Ecology	<p>Having reviewed the Ecological Appraisal Report and understand that <i>“The development should be compliant with relevant legislation without the need for further mitigation, although several recommended enhancements have been provided”</i></p> <ol style="list-style-type: none"> 1. Is it possible for Buro Happold Limited to consolidate to one single document the details of the following (to inform those recommendations <i>e.g. pre-works check, net biodiversity gain, sensitively lit etc</i>); <ul style="list-style-type: none"> • Description of the actual or potential ecological issues and opportunities that might arise as a result of the site’s future development; and • Recommendations for mitigation of adverse effects and ecological enhancement, to ensure conformity with policy and legislation listed in Appendix 1. 2. Has the Tree and Woodland Manager Alex Fraser responded to the following section? 	
Pollution	<p>No objections, but the following planning conditions are recommended should planning permission be granted.</p> <ol style="list-style-type: none"> 1. Land Contamination <p>Before development commences other than for investigative work:</p> <ol style="list-style-type: none"> a. Using the information already submitted in Land Contamination Assessment (Phase I) with reference HRW-BHE-GD-XX-RP-CG-002 Revision P03 prepared by Buro Happold Ltd dated 27th May 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 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. 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. 	

Stakeholder	Comment	Response
	<p>c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and;</p> <p>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.</p> <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>2. Unexpected Contamination</p> <p>If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <p>Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.</p> <p>3. NRMM</p> <p>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 http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.</p> <p>b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ</p>	

Stakeholder	Comment	Response
	<p>4. Demolition/Construction Environmental Management Plans</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> <p>b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:</p> <ul style="list-style-type: none"> i. A construction method statement which identifies the stages and details how works will be undertaken; ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding; viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance); ix. Details of external lighting; and, x. Details of any other standard environmental management and control measures to be implemented. <p>c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:</p> <ul style="list-style-type: none"> i. Monitoring and joint working arrangements, where appropriate; ii. Site access and car parking arrangements; iii. Delivery booking systems; iv. Agreed routes to/from the Plot; v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and 	

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	<p>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</p> <p>vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.</p> <p>d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:</p> <p>i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;</p> <p>ii. Details confirming the Plot has been registered at http://nrmm.london;</p> <p>iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;</p> <p>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);</p> <p>v. A Dust Risk Assessment for the works; and</p> <p>vi. Lorry Parking, in joint arrangement where appropriate.</p> <p>The development shall be carried out in accordance with the submitted Site Construction Management Plan which can form part of the information to be consider for the discharge of the attached Demolition/Construction Environmental Management Plans condition.</p> <p>Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.</p> <p>Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.”</p> <p>Informative:</p> <p>1. 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>	
Lead Local Flood Authority (LLFA)	The SuDS, hierarchy has been followed and the proposed SuDS for the sites include the following, below ground attenuation systems, tree pits and permeable paving throughout the	

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	<p>proposed developments with an acceptable controlled run-off rate of 3 x Green Field rate of 5.651 l/s per ha.</p> <p>Where the consultants have proposed connection to the Moselle culvert they must gain the necessary consent/permits from the EA, for any proposed construction that will take place.</p> <p>Consent from Thames Water, will also be required to connect to their network and confirmation that capacity exists in their network to receive the surface water being discharged via attenuation using a flow control device.</p> <p>A maintenance programme has been provided and sets out a comprehensive schedule and frequency of maintenance visits, confirmation of who will be responsible for the maintenance that must be for the lifetime of the developments.</p>	
School Place Planning	<p>Having reviewed them and also checked with Philip Crowther that this development has been included within the annual development trajectory data (which forms part of our school roll projections) I am satisfied that we will have sufficient school capacity. I therefore have no specific comments on the application.</p>	
Transportation	<p><u>Proposed Car Parking.</u> Residential car parking would be provided at a ratio of 0.16 space per home, in line with the ratio used for the consented Depot planning application (the most recent of two approved schemes). The Goods Yard site would have 50 wheelchair-accessible and 30 standard spaces for residents whereas the Depot site would have 37 wheelchair-accessible and 22 standard spaces for residents. An additional two wheelchair-accessible spaces would be provided on the Goods Yard site for visitors to the residential units.</p> <p>Commercial parking would consist of 10 operational spaces on the Goods Yard site which are understood to be a re-provision for the Carbery Enterprise Park, anticipated to occupy a proportion of commercial floorspace provided on site. Tying operational parking to a specific tenant is generally not supported, as Carbery Enterprise Park may end up not moving back in. Additionally, as this is a new development, parking provision would be subject to the latest London Plan (2021) car parking standards for office land use. As the site is located within the Upper Lea Valley Outer London Opportunity Area, only up to 1 space per 600sqm GIA could be provided, which would equate to a maximum of 3 spaces across the site. One of these spaces should be wheelchair-accessible.</p> <p>On each site, it is proposed to provide two car club spaces for the use of residents and commercial occupiers. Justification is required for how the proposed provision of 4 car club bays across the whole site has been determined (is the proposed provision based on a demand assessment undertaken by a</p>	

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	<p>prospective car club provider, or is it a direct re-provision of what was agreed in the consented planning applications?).</p> <p>No details of electric vehicle charging points have been given in the Transport Assessment. In line with the London Plan (2021) standards, all residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20% of spaces should have active charging facilities, with passive provision for all remaining spaces. All non-residential operational parking spaces should be fitted with infrastructure for electric or other Ultra-Low Emission vehicles. This should be marked up on the plans.</p> <p>Overall, WebCAT indicates that the site mostly lies in areas of PTAL 4, with the north western corner having a slightly lower PTAL (3). The site is also located in the Tottenham North CPZ. The proposed development would also make provision for wheelchair-accessible car parking, in line with the relevant standards. In accordance with Policy DM32: Parking of the Development Management DPD, the proposed development would qualify for a car-free status (the part of the site with lower connectivity is immediately adjacent to areas of PTAL 4; London Plan paragraph 10.6.4 also states that <i>“the starting point for discussions should be the highest existing or planned PTAL at the site”</i>).</p> <p>The Council would not issue any occupiers with on-street resident/business parking permits due to its car-free nature. The Council would use legal agreements to require the landowners to advise all occupiers of the car-free status of the proposed development.</p> <p><u>Car Park Access</u> Swept path analysis has been provided showing vehicles using the basement car park ramp access arrangements. Additional swept paths are required showing vehicles manoeuvring within the two basement car parks, in and out of spaces in key locations. We ask that vehicle swept paths have 300mm safety buffers. Key dimensions should be marked up (aisle and bin widths, parking space dimensions) on the plans.</p> <p><u>Car Parking Management Plan.</u> An outline Car Parking Management Plan has been provided as part of the Transport Assessment. A more detailed and refined plan would be secured by planning condition. In addition to the allocation and enforcement strategies, the pre-occupation updated plan should include details of the proposed signal control and give-way systems used to manage vehicular movements in and out of the basement car parks via the proposed ramps. Estimates of vehicle movements at peak hours should be included to demonstrate how the proposed control systems would effectively manage peak arrivals and departures. Any potential queues on either side of the ramps should be identified and discussed in the context of the proposed measures.</p> <p>The Car Parking Management Plan should also include details of how the number of parking spaces progressively made available would correspond to the phased number of dwellings constructed, so as</p>	

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	<p>to maintain the ratio of 0.16 space per dwelling throughout the whole duration of the construction works as buildings become operational and occupied.</p> <p>The Car Parking Management Plan may also consider mechanisms whereby particular spaces for which no demand arises are re-assigned temporarily to other eligible user categories (using the priority system) by means of short leases, so that they can revert back to their primary function when leases are up and there is specific demand for it. In particular, this can apply to wheelchair-accessible car parking spaces if a number of them do not find disabled resident lessees requiring access to them. Such spaces can be reassigned to a secondary function as standard spaces for residents of larger units (or anybody else identified in the list in a specific order of priority) on a short-term basis.</p> <p><u>Proposed Cycle Parking.</u> Cycle parking is proposed in line with the relevant London Plan (2021) standards. The number of cycle parking spaces per cycle store and external location should however be indicated on all relevant plans. A distinction should be made between Sheffield stands and two-tier racks, if not already the case. The adequacy of the long-stay and short-stay cycle parking and access arrangements 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 plans.</p> <p><u>Trip Generation Assessment.</u> The net trip generation has been calculated directly by applying the latest trip rates derived from TRICS to the uplift in floorspace and number of residential units (additional to the two consented schemes). The total trip generation has then been established by adding the net trips to the trips associated with both consented schemes. Whilst this approach is not wrong, it directly minimises the effect of the journey purpose disaggregation methodology used in the Transport Assessment and therefore may skew the assessment as the majority of the total proposed trips would still be derived from the consented schemes, which based their modal splits either directly on TRICS or journey-to-work data only. The effect of this is a potential overestimation of mode shares associated with commuting/business in the final total multi-modal trips for the proposed development.</p> <p>We therefore request that the total multi-modal trip generation be assessed first by using the whole proposed floorspace and number of residential units, then the net trip generation be derived by subtracting the consented trip generation from the extant Goods Yard and Depot permissions. Both sets of net multi-modal trips should then be compared and the higher of the two should be utilised for the transport network impact assessment. A short technical note setting out the comparison of the two methodologies and the resultant impact upon net trips across the different transport networks should be prepared.</p> <p>The same comparison should be undertaken for delivery and servicing trips, so that the net trip generation of those vehicles does not end up being underestimated. The loading bay requirement,</p>	

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	<p>based on the total delivery and servicing trip generation, should be reviewed to ensure that the proposed number of loading bays remains adequate.</p> <p>The transport network impact assessment, which may need to be revised depending on the outcome of the above review, should consider both net trips from the proposed development and net trips plus cumulative trips from local committed schemes.</p> <p><u>Updated Alternative Trip Generation Assessment.</u> Further to my comments, the cumulative impact assessment has been revised due to errors in Table 10. The impact upon the local highway, pedestrian and cycle networks when considering both the total development and local committed trips is not significant and therefore acceptable.</p> <p>Of particular interest is the impact upon the rail and bus networks. The analysis has considered the maximum cumulative directional increases, respectively 71 bus trips departing southbound in the AM peak hour and 217 rail trips arriving northbound in the PM peak hour. These maximum cumulative directional increases have then been divided by numbers of local bus and rail services. However, it is unclear how these numbers have been obtained (respectively 43 buses per hour per direction and 45 trains arriving at the local rail stations) and therefore it is difficult to say whether the directional increases have been divided by the relevant numbers of services (in the same direction as the maximum flows identified) or the total numbers of services (in all directions). There is therefore the possibility that the average increases per bus/rail service derived to establish the impact upon individual buses and trains may have been underestimated and are lesser than what they should be.</p> <p><u>Additional Public Transport Impact Analysis.</u> Whilst I am concerned with the accuracy and robustness of the aforementioned assessment, I am overall satisfied with the assessment undertaken at TfL's request at a more granular level, taking account of the wider High Road West Masterplan trips (including an estimate of the Lendlease residential trips), however I still have some reservations about the cumulative bus trip impact assessment, and I think it needs to be more detailed and look at the impact upon relevant services for all directions, to identify the greatest directional impact. Ultimately, it would be welcome to hear TfL's views on the additional public transport impact analysis.</p> <p>All in all, I will not object on transport grounds, and a resolution to grant by the Council would allow greater scrutiny by the GLA and TfL, notably if mitigations are to be sought as a result of the impact upon certain bus services.</p> <p><u>Framework Travel Plan.</u> The cycling mode share target for commercial land uses should be revised upwards from the baseline in future versions of the Commercial Travel Plan. A 7% target at the Year 5 horizon seems very unambitious. Although the end use class of the commercial space is unknown (as land use class E spans a wide range of uses), assuming an employment density of 1 employee per 15sqm NIA (based on $2,040 \times 95\% \times 70\% = 1,357\text{sqm NIA}$, i.e. 90 employees), a 7% mode share would</p>	

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	<p>equate to 6 employees cycling, which is roughly 40% of the long-stay cycle parking provision of 15 spaces.</p> <p>Future versions of the Travel Plan should have regard to the emerging Walking and Cycling Action Plan (currently in draft form for public consultation) to ensure walking and cycling targets and measures align with the Borough's aspirations.</p> <p><u>Outline Construction Logistics Plan.</u> A Detailed Construction Logistics Plan (CLP) would be secured by planning condition. In the Outline CLP there is no mention of staff travel planning measures promote on-site cycle parking. This should be picked up in the Detailed CLP.</p> <p>Planning Conditions</p> <ol style="list-style-type: none"> 1. <u>Cycle Parking Details</u> <p>No development shall commence in the relevant Phase until details of cycle parking in that Phase have been submitted to and approved in writing by the Local Planning Authority. The details shall demonstrate compliance with the relevant London Plan (2021) standards and the London Cycling Design Standards. The cycle parking provision shall be implemented in accordance with the approved details and 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> 2. <u>Delivery and Servicing Plan</u> <p>No development in the relevant Phase shall be occupied until a Delivery and Servicing Plan (DSP) for that Phase has been submitted to and approved in writing by the Local Planning Authority. The DSP for that Phase shall be in broad conformity with the approved Delivery and Servicing Plan (within the approved Transport Assessment) and Transport for London's Delivery and Servicing Plan Guidance (2020). The DSP shall be updated following the results of the first delivery and servicing survey to be undertaken within 12 months of first occupation of the relevant Phase of the proposed development.</p> <p>This process shall be repeated until all Phases of the proposed development have been delivered and occupied, at which point every Phase DSP shall be consolidated into one overarching full DSP and retained thereafter. 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</p> 	

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	<p>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.</p> <p>3. <u>Detailed Construction Logistics Plan</u></p> <p>No development shall commence in the relevant Phase until a Detailed Construction Logistics Plan (CLP) for that Phase has been submitted to and approved in writing by the Local Planning Authority. The Detailed CLP for that Phase 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>Car Parking Management Plan</u></p> <p>No development in the relevant Phase shall be occupied until a Car Park Design and Management Plan (CPMP) for that Phase has been submitted to and approved in writing by the Local Planning Authority. The CPMP shall include details of the allocation, management and enforcement of the on-site car parking spaces, including the wheelchair-accessible car parking spaces and electric vehicle charging points. The CPMP shall set out details of the proposed signal control and give-way systems used to manage vehicular movements in and out of the basement car parks via the proposed ramps and demonstrate their adequacy to manage any vehicle queues. The approved CPMP shall be implemented as approved and retained thereafter.</p> <p><u>Reason:</u> To manage the on-site car parking provision of the proposed development so that it is used efficiently and only by authorised occupiers. To protect the amenity of the site users. To promote sustainable travel.</p> <p>5. <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</p>	

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	<p>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> <p><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>6. Demolition and Construction Environmental Management Plan (including Demolition and Construction Traffic Management Plan) – for consideration, these might be suggested by other officers.</p> <p>Section 106 Heads of Terms</p> <p>Here are some Section 106 Heads of Terms. I'm sure there is standard text for these so here is a list of what I believe is required. As the proposed development would be phased, the wording of these may need to be adjusted:</p> <ul style="list-style-type: none"> • Residential Travel Plan (including Travel Plan Monitoring Cost) • Commercial Travel Plan (including Travel Plan Monitoring Cost) • Car Club Membership Contributions • Car-Capped Agreement (including Traffic Management Order Contributions) • Highway Works (Section 278 Agreement) – plans showing the proposed highway works (including new access junctions), to be requested from the applicant. • Highway and Public Realm Contributions – these were requested for the previously consented Goods Yard and Depot applications, amount to be determined if this is relevant (unsure what the scope would be). 	
Tree Officer	<p>It is proposed to fell 20 trees to facilitate this large new development. 15 of these are category C trees, which are of low quality and value and should not be an obstacle to development. 4 are category B trees. All 4 category A trees will be retained as will 96% of category B trees.</p> <p>The 4 high quality trees (3001 to 3004) are located along the frontage of the Depot with the High Road. The root protection area of these trees is primarily covered by existing hard surfaces. The development proposal includes changes to the land use within the RPAs, but no significant changes to the surfacing. Robust tree protection measures must be installed to ensure these trees are adequately safeguarded. Close arboricultural supervision will also be required to ensure the successful retention of these trees.</p> <p>The landscaping plans show new tree planting in areas of open space throughout the development site. If these proposals are confirmed, it will result in a significant increase in the number of trees across the</p>	

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	<p>site. This will also benefit the Northumberland Park ward as a whole, which currently has an existing tree canopy cover of less than 17%.</p>	
Waste	<p>Following the current LBH waste guidance provision the following will be required across the whole development.</p> <ul style="list-style-type: none"> • 144x 1100L refuse containers. • 86x 1100L recycling containers. • 26x 240L food waste containers. • 867x food waste kitchen caddies. <p>Commercial waste must be stored and collected separately from residential waste.</p> <p>Any Commercial enterprise must arrange for a scheduled waste collection with a Commercial Waste Contractor. The business owner will need to ensure that they have a cleansing schedule in place and that all waste is always contained. Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</p> <p>There is very little detail provided with the application and waste containers for each block must follow the guidance provided in the bulk container advice below. All guidance above and below should be followed and confirmation provided.</p> <p>The above planning application has been given a RAG traffic light status of AMBER for waste storage and collection</p>	
EXTERNAL		
Cadent Gas	<p>Affected Apparatus</p> <p>The apparatus that has been identified as being in the vicinity of your proposed works is:</p> <ul style="list-style-type: none"> • Low or Medium pressure (below 2 bar) gas pipes and associated equipment. (As a result, it is highly likely that there are gas services and associated apparatus in the vicinity). 	
Clinical Commissioning Group	<p>The socio-economic chapter of the submitted Environmental Statement notes that there are five GP surgeries within approximately 1km of the site (Table 7.10 and Figure 7.6). Three of these practices are in the London Borough of Enfield. Paragraph 7.4.41 correctly identifies that the ratio of FTE GPs per registered patients is above the standard benchmark which indicates</p>	

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	<p>that the practices have no surplus capacity. This includes the two closest practices - Tottenham Health Centre and Somerset Gardens Family Health Centre.</p> <p>Paragraph 7.7.30 suggests that a new health centre planned as part of the Tottenham Hotspur FC stadium redevelopment project could provide additional capacity. However, this facility has not been secured as a planning obligation and its use as an NHS health centre is not guaranteed. The CCG is not pursuing this option and are in active discussions with the Council regarding new healthcare provision for Tottenham Health Centre as part of the High Road West regeneration plans. It is envisaged that this new facility could come forward in 2028-29, but the timing is uncertain.</p> <p>In advance of a new facility coming forward, investment is needed to increase the capacity of local GP premises. A s106 contribution is required to mitigate the site-specific impact of the development and the CCG has identified that investment at Somerset Gardens Family Health Centre could provide additional capacity. The HUDU Planning Contributions Model has been used to calculate the contribution. The requirement would meet the tests in CIL Regulation 122 as it is considered necessary, reasonable and directly related to the development.</p> <p>Whilst health and wellbeing facilities are included on the Strategic Community Infrastructure Levy Infrastructure List, the list is indicative and there is no guarantee that CIL receipts will be allocated towards health infrastructure in north Tottenham to mitigate the impact of development. To date, no CIL receipts have been allocated towards healthcare infrastructure. Using the proposed housing mix stated in the Planning Statement (Tables 4.1 and 7.2), the HUDU Planning Contributions Model calculates a primary healthcare capital s106 requirement of £449,510.</p>	
Enfield (London Borough of)	Acknowledged, but no comments received.	
Environment Agency	<p>We have assessed this application as having a low environmental risk. We therefore have no comments to make.</p> <p>Non planning consents: Although we have no comments on this planning application, the applicant may be required to apply for other consents directly from us. The term 'consent' covers consents, permissions or licenses for different activities (such as water abstraction or discharging to a stream), and we have a regulatory role in issuing and monitoring them.</p>	

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Historic England	<p>On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.</p>	
Historic England (GLAAS)	<p>Topographically and geologically, the site occupies the River Lea's low terrace. The Leyton gravels here (often mapped as Kempton Park) are often capped by brickearth and as a result have potential for early and later prehistoric remains.</p> <p>The Corcoran Lea Valley monograph puts prehistoric archaeological potential in this zone as moderate - disagreeing with the applicants' consultants who describe it as low - and it also puts Roman potential as being much higher than the applicants' ES does.</p> <p>Roman burials can be reasonably expected given the established pattern of funerary activity close to the headwaters of the Lea's tributary valleys, in this case the Moselle to the south and Pymmes Brook to the north, and the already mentioned presence of the Roman road.</p> <p>Alongside prehistoric and Roman potential at the site suggested by its geography, hydrology and geology, there are also possible mediaeval and post-mediaeval remains connected with Tottenham vicarage in the south of the site. This building is proposed for demolition but as a former high status local building would normally merit consideration for retention in a consented scheme.</p> <p>As well as its pessimistic assessment of potential, the ES archaeology chapter is disappointing in its mitigation proposals which all involve destructive investigation and no detailed public benefits or protection of key remains. There are a number of missed opportunities for such an extensive development to reflect and celebrate local heritage and address policy aims in that area.</p> <p><u>Recommended conditions:</u> No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</p> <p style="padding-left: 40px;">A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</p>	

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	<p>B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.</p> <p>Informative: Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England’s Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.</p> <p>Condition: No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.</p> <p>Reason: The planning authority wishes to secure physical preservation of the site's archaeological interest in accordance with the NPPF.</p>	
London Fire Brigade	If the applicant complies with what they have put in Section 7 (of its Fire Statement), then they would comply with the London Fire Brigades requirements for firefighting access.	
Metropolitan Police (DOCO)	<p>We have met with the project Architects to discuss Crime Prevention and Secured by Design (SBD) for part of the site (NE5279 – 867-879 High Road) and not for the overall site or in the finite detail that has been presented in the planning application. Several requests were made in May 2021 to discuss the details, but due to the architect not being available for discussions further information was not presented to our department.</p> <p>However, it has been noted that the Architects have made significant changes to the overall site design to take SBD into consideration and this is disclosed within the Design and Access Statement with reference to design out crime or crime prevention. The architects have also stated that should it be required; consultation will take place with the MPS Designing Out Crime Team during the “detailed design stage”. At this point it can be difficult to design out all issues identified and at best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.</p>	

Stakeholder	Comment	Response
	<p>Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative that highlights the key aspect of the condition and any major concerns that have been noted during the review of the files within the planning application. The comments made can be easily mitigated early if the Architects were to re-engage and discuss this project prior to commencement, throughout its build and by following the advice given.</p> <p>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.</p> <p><u>Section 2 - Secured by Design Conditions and Informative:</u> 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. (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><u>Informative:</u> The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p> <p><u>Section 3 - Conclusion:</u> 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>	

Stakeholder	Comment	Response
National Planning Case Unit	No comments on the Environmental Statement.	
Natural England	<p>Natural England has no comment on this application with regards to statutory designated sites.</p> <p>Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.</p> <p>It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision-making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.</p> <p>Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available here.</p>	
Network Rail	<p><u>Demolition</u> Any demolition works on site must be carried out so that they do not endanger the safe operation of the railway, or the stability of the adjoining Network Rail structures and land. The demolition of the existing building, due to its close proximity to the Network Rail boundary, must be carried out in accordance with an agreed method statement. Approval of the method statement must be obtained from the Network Rail Asset Protection Engineer before the development and any demolition works on site can commence.</p> <p><u>Scaffolding, Plant & Materials</u> All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail. Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.</p>	

Stakeholder	Comment	Response
	<p><u>Track Support Zone</u> Please also note that the 'track support zone' is defined in Network Rail standard NR/L2/CIV/177 and any proposal which may require works to be conducted within this zone must be identified by the outside party and subsequent consultation with Network Rail must take place. Should criteria be met within this standard, a track monitoring plan will have to be agreed with Network Rail.</p> <p><u>Overhead Line Equipment</u> No works may be carried out where there is a risk of any plant or element, temporary or permanent, coming within 3.5m of the Overhead Live Electricity.</p> <p><u>Site Layout</u> It is recommended that all buildings be situated at least 2 metres from the boundary fence, to allow construction and any future maintenance work to be carried out without involving entry onto Network Rail's infrastructure. Where trees exist on Network Rail land the design of foundations close to the boundary must take into account the effects of root penetration in accordance with the Building Research Establishment's guidelines. Existing railway infrastructures should not be loaded with additional surcharge from the proposed development unless the agreement is reached with Network Rail. Stability of the ground / embankment adjacent to the railway should not be loaded with increased surcharge to mitigate the risk of instability of the ground which can cause the settlement on Network Rail infrastructure.</p>	
Sport England	<p>Community Sports Facility Provision Although there is floorspace proposed for uses falling within Use Class E it is not clear whether any of these would actually be sport facilities and, if there were to be sport facilities, then it is not clear what sport facilities would be provided. As a result, it would be unknown if any sport facilities would meet the sporting demands arising from the development.</p> <p>Changes to CIL Regulations in 2019 has resulted in the Council having the opportunity to seek contributions through CIL or via a S. 106 Agreement however it is not clear how, or if, the Council intends to mitigate the impact of the increase of sporting demand on local sport facilities.</p>	

Stakeholder	Comment	Response
	<p>If provision for sports facilities is to be made by the CIL charge, it is acknowledged that there is no requirement to identify where those CIL monies will be directed as part of the determination of any application. That said, Sport England would encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Playing Pitch Strategy and/or any other robust borough wide sport facility strategy and direct those funds to deliver new and improved facilities for sport based on the priorities identified in those documents.</p> <p>In the event that the Council decides to seek provision for sports facility provision through a S. 106 agreement rather than the CIL charge then Sport England would be happy to provide further advice. To assist the Council, an estimate of the demand generated for outdoor sports provision can be provided by Sport England's Playing Pitch Calculator strategic planning tool. Team data from the Council's Playing Pitch Strategy can be applied to the Playing Pitch Calculator which can then assess the demand generated in pitch equivalents (and the associated costs of delivery) by the population generated in a new residential development. It can also calculate changing room demand to support the use of this pitch demand.</p> <p>In relation to built sport facilities, Sport England's established Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain sports facility types. The SFC indicates that a population of 2,081 (calculated by multiplying the number of residential units by the average occupation rate of 2.4) in the London Borough of Haringey would generate a demand for 0.15 sports halls (£504,697), 0.1 swimming pools (£852,922), 0.07 artificial grass pitches (£93,867 if 3G or £85,376 if sand) and 0.1 rinks of an indoor bowls centres (£538,632). Consideration should be given by the Council to using the figures from the Sports Facility Calculator for informing the level of any financial contribution if indoor sports provision was to be made through a S.106 agreement.</p> <p>Active Design Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities</p>	

Stakeholder	Comment	Response
	<p>through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments.</p>	
Thames Water	<p><u>Waste Comments</u> Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc may be required before the Company can give its consent.</p> <p>Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.</p> <p><u>Water Comments</u> Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either: - all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a development and infrastructure phasing plan have been agreed with Thames Water to allow</p>	

Stakeholder	Comment	Response
	<p>development to be occupied. Where a development and infrastructure phasing plan are agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development”</p> <p>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 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 proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken</p> <p><u>Supplementary Comments</u> Wastewater: As per response from developer enquiry - Sw from The Good Yard to discharge directly to the culverted watercourse of which Thames Water is not the maintainer. Approval should be sought from the Lead Local Flood Authority. As the development is located on a Brownfield site there may be existing sewers or rising mains crossing the site. Where these sewers or rising mains are to become redundant or have to be diverted the full cost of administering and undertaking the works shall be financed by the developer.</p>	
Transport for London	No comments.	
Waltham Forest (London Borough of)	No comments.	