

Appendix 4: Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
<b>INTERNAL</b>		
LBH Building Control	<p>I refer to the response from HSE with regards to planning ref: HGY/2021/2283 application for a mixed use residential scheme at the above property.</p> <p>HSE originally commented on the 20 August 2021 advising ‘Significant Concern’ with the planning application. Both Haringey Building Control and London Fire Brigade (LFB) had a different view to the HSE at that time, advising that the proposed fire solution was appropriate for the development proposed and that they would support the planning application. Following a subsequent detailed response to the HSE from the applicant’s fire consultant issued on 25 November (Buro Happold), HSE subsequently amended their comments and advised ‘Some Concern’ in their second response on 2nd December 2021.</p> <p>The HSE response advises ‘Some Concern’, identifying the following three points:-</p> <ol style="list-style-type: none"> <li>1. Notwithstanding the assurances provided by London Fire Brigade and Building Control, concerns remain about the length of the horizontal run of the dry fire main (38.6 meters), which is 20 meters longer than the recommended standard.</li> <li>2. Notwithstanding the assurances provided by London Fire Brigade and Building Control, concerns remain about the distance that firefighters will have to travel (56 meters) to access the building entrance on Percival Court and the dry fire main inlet, which is 38 meters longer than the recommended standard.</li> <li>3. The follow up document “211125 - Cover letter - HSE Comments_BH response” states: “The fire hydrants that are used as part of this development is on the public domain as such is it is expected that those fire hydrants are periodically tested. However, due to the lack of evidence the response “don’t know” was the most adequate. This will be ensured as part of the Building Regulations process and upgraded (or private fire hydrant provided) if necessary.”</li> </ol> <p>Whilst this is a valid response on the form, it is not appropriate to this development, which relies heavily on two working fire hydrants for firefighting water supplies to feed the three proposed dry rising mains.</p> <p>Without knowing if the hydrants are useable, the proposal might be relying on a disused water main or faulty hydrant. The LPA may wish to seek information from the applicant about the robustness of the assumptions made in relation to this</p>	<p>Officers note that LBH Building Control and the London Fire Brigade have confirmed that the design intent approach adopted by the applicant is entirely appropriate and neither party have any outstanding concerns. As such, the proposal is considered to be satisfactory from a fire safety perspective.</p>

	<p>aspect, to understand better the likelihood of the need for changes that could impact on the landscape and appearance of the development.</p> <p>Subsequent to above, the applicant team Fire Engineer (Buro Happold) have presented and issued a Design Note outlining further details and rationale as to the acceptability of the proposals in clarification of the specific points highlighted by the HSE.</p> <p>Having reviewed this design note with both London Fire Brigade and within the Building Control team, I can confirm that we are satisfied that the design intent approach adopted by the applicant is entirely appropriate to the proposed development and neither party have any outstanding concerns. We therefore support the planning application in fire safety terms.</p> <p>We will of course require a greater level of detail as the design develops beyond the planning stage, including confirmation that the fire hydrants are in fully working order, which depending upon timing, may be subject to 'Gateway 2' and formal control by the Building Safety Regulator.</p>					
LBH Carbon Management	<p><b>Carbon Management Response 10/12/2021</b></p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> <li>• Sustainability and Energy Statement (dated 25 November 2021), prepared by Buro Happold</li> <li>• Sustainability and Energy Statement Appendices (dated 25 November July 2021), prepared by Buro Happold</li> <li>• Further clarifications via email</li> </ul> <p><b>Energy – Overall</b></p> <p>The revised Energy Strategy demonstrates a higher reduction in carbon emissions on site, from 63% to 68%, based on SAP2012 carbon factors.</p> <p>The applicant is still reporting on SAP10 carbon factors despite this development connecting to the DEN; the GLA's guidance sets out that SAP2012 carbon factors are more appropriate for DEN sites.</p> <table border="1" data-bbox="618 1294 1704 1358"> <tr> <td data-bbox="618 1294 927 1358"></td> <td data-bbox="927 1294 1151 1358"><b>Residential</b></td> <td data-bbox="1151 1294 1368 1358"><b>Non-residential</b></td> <td data-bbox="1368 1294 1704 1358"><b>Site wide</b></td> </tr> </table>		<b>Residential</b>	<b>Non-residential</b>	<b>Site wide</b>	Recommended conditions and s106 heads of terms included. The proposal would therefore be acceptable.
	<b>Residential</b>	<b>Non-residential</b>	<b>Site wide</b>			

(SAP2012 emission factors)	tCO <sub>2</sub>	%	tCO <sub>2</sub>	%	tCO <sub>2</sub>	%
<b>Baseline emissions</b>	79.7		47.9		127.6	
<b>Be Lean savings</b>	6.5	8%	9.3	19%	15.8	12%
<b>Be Clean savings</b>	39.7	50%	11	23%	50.7	40%
<b>Be Green savings</b>	16.1	20%	3.9	8%	20	16%
<b>Cumulative savings</b>	62.3	78%	24.2	50%	86.5	68%
<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	17.4		23.7		41.2	
<b>Carbon offset contribution (incl. 10% management fee)</b>	£95 x 30 years x 41.2 tCO <sub>2</sub> /year = £117,420 + £11,742 = £129,162					

### Energy - Be Lean

The applicant has modelled the following changes to the Be Lean inputs:

- External wall from 0.15 to 0.12 W/m<sup>2</sup>K
- Triple glazed windows from 1 to 0.8 W/m<sup>2</sup>K
- Distribution loss factor from 1.1 to 1.05
- Window size dimensions from 2300(H)x1100(W) to 1600(H)x1200(W)

As a result, the improvement from TFEE has increased from 6% to 12%.

Overall the residential element of the development does not comply with London Plan Policy SI2, requiring a minimum 10% reduction in emissions under Be Lean with SAP2012 carbon factors. It is acknowledged that the reduction has increased from 1% to 8%, and that the applicant is confident that the remaining 2% can be met through the detailed design stage and by including more realistic performance factors for aspects such as thermal bridging. A 10% reduction will therefore be conditioned to overcome this and meet policy requirements.

### Overheating

The applicant has undertaken revised and additional modelling in line with previous requests. The updated results are noted below.

All windows are expected to require acoustic louvres in order to pass the mandatory weather file. A 300mm recess to windows was also included in the model. The applicant has confirmed the installation of ceiling fans is possible within the current room heights.

London Weather Centre	Number of habitable rooms pass TM59	Number of habitable rooms pass TM59 (with ceiling fan future mitigation)
DSY1 2020s	66/66	66/66
DSY2 2020s	1/66	66/66
DSY3 2020s	0/66	66/66
DSY1 2050s	4/66	66/66
DSY2 2050s	0/66	66/66
DSY3 2050s	0/66	66/66
DSY1 2080s	0/66	66/66
DSY2 2080s	0/66	56/66
DSY3 2080s	0/66	42/66
Total number of homes / habitable rooms / corridors modelled	66 habitable rooms, 20 apartments (incl. 3 duplexes) 34% of floor area modelled	

### Conclusion

The development complies with the relevant planning policies, subject to securing the proposed Heads of Terms and planning conditions.

An estimated carbon offset contribution of £117,420 + 10% management fee is required to ensure the development meets the zero-carbon requirement through allowable solutions.

### S106 Heads of Terms

The Section 106 agreement heads of terms should include:

- Be Seen requirement
- Energy Plan and Sustainability Review
- Estimated carbon offset contribution of £117,420 + 10% management fee (based on £2,850 per tonne of carbon emissions)
- DEN connection (and associated obligations)
- Heating strategy fall-back option if not connecting to the DEN

### Planning Conditions

To be secured:

Energy strategy

*The development hereby approved shall be constructed in accordance with the Sustainability and Energy Statement (dated 25 November 2021), prepared by Buro Happold delivering a minimum site-wide 68% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP2012 emission factors, high fabric efficiencies, connection to the Decentralised Energy Network, and minimum 55 kWp solar photovoltaic (PV) energy generation.*

*The final agreed energy strategy shall be installed and 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 for the lifetime of the development.*

*(a) Prior to above ground construction, details supporting the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:*

- Confirmation of the overall % reduction in line with the Energy Hierarchy;*
- Confirmation of the necessary fabric efficiencies to achieve a minimum 10% reduction (residential) and minimum 19% (non-residential) in SAP2012 carbon factors, including details to reduce thermal bridging;*
- Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid or semi-rigid MVHR ducting;*
- Maximum possible solar energy to be generated on the roof, with details including: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp).*
- 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;*
- A strategy for the supply of heat to buildings occupied before the site-wide energy centre is available;*
- 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.*

*(b) Within six months of first occupation, evidence that the solar PV installation has been installed correctly shall be submitted to and approved by the Local Planning Authority,*

*including photographs of the solar array, a six-month energy generation statement, and a Microgeneration Certification Scheme certificate.*

*(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.*

*Reason: To ensure the development 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) Policies SI2, SI3 and SI4, and Local Plan Policy SP4 and DM22.*

*Overheating*

*Prior to occupation of the development, the following overheating measures must be installed and be retained for the lifetime of the development to reduce the risk of overheating in habitable rooms in line with the Overheating Analysis (dated 27 November 2021) prepared by Buro Happold:*

- Natural ventilation, with openable areas of 30% at night in LKD; 100% openable at night in bedrooms;*
- Glazing g-value of 0.35;*
- Acoustic louvres 450x2300mm (all windows), 30% free area;*
- Façade shading, 300mm recess depth windows;*
- MVHR with summer bypass;*
- Ceiling fans in high-risk dwellings;*
- Hot water pipes insulated to high standards with maximum heat losses as modelled;*
- No active cooling.*

*If the design of the development is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.*

*Reason: In the interest of reducing the impacts of climate change, 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.*

*BREEAM (or equivalent)*

*(a) A minimum of 6 months prior to commencement on site, design stage accreditation certificates must be submitted for the Shell & Core office space and a Fully Fitted Leisure*

*and Assembly to the Local Planning Authority confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”.*

*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.*

*(b) At least 6 months prior to occupation, both post-construction certificates issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.*

*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 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.*

*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.*

*Living roof(s)*

*(a) Prior to the commencement of development, details of the living roof(s) and living wall(s) must be submitted to and approved in writing by the Local Planning Authority. Living roofs 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:*

- i) A roof plan identifying where the living roofs will be located and a floor plan identifying where the living walls will be rooted in the ground;*
- ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);*
- ii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate*
- iii) Roof plans annotating details of invertebrate habitat structures with a minimum of one feature per 30m<sup>2</sup> of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-*

	<p><i>buried log piles / flat stones for invertebrates (minimum footprint of 1m<sup>2</sup>), rope coils, pebble mounds of water trays;</i></p> <p><i>iv) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m<sup>2</sup>) and density of plug plants planted (minimum 20/m<sup>2</sup> with roof ball of plugs 25m<sup>3</sup>) to benefit native wildlife. The living roof will not rely on one species of plant life such as Sedum (which are not native);</i></p> <p><i>v) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</i></p> <p><i>vi) Management and maintenance plan, including frequency of watering arrangements.</i></p> <p><i>(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) shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.</i></p> <p><i>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, S11 and S12 of the London Plan (2021) and Policies SP4, SP5, SP11 and SP13 of the Haringey Local Plan (2017).</i></p> <p><u><i>Biodiversity measures [if not already proposed by colleagues]</i></u></p> <p><i>(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.</i></p> <p><i>(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.</i></p>	
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	<p><i>Development shall accord with the details as approved and retained for the lifetime of the development.</i></p> <p><i>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).</i></p>	
LBH Conservation Officer	<p><u>Site</u>  The wider development site lies to the west of the North Tottenham Conservation Area which is characterised as an almost intact 19th century townscape incorporating notable surviving examples of earlier periods. Despite a few changes, the townscape of this part of the High Road retains a high degree of historical continuity and displays a notable variety and contrast in architectural styles and materials . The Conservation Area includes the best surviving townscape section of the High Road as well a distinctive sequence of 18th and 19th century buildings, some statutory listed, including properties at Nos. 790 to 802, and 808-810, and some locally listed that create a densely built, almost continuous frontage of two-three storey historic buildings that greatly contribute to the sense of enclosure and character of the historic High Road .</p> <p>The site predominantly extends to the west of the historic street frontage of the High Road, just at the back of the locally listed Nos 813-817 High Road and on the western edge of the Conservation Area boundary. The site also comprises the grade II listed properties at Nos 819-821 High Road and the locally listed property at Nos 823-829 which form part of the historic frontage of the Conservation Area. The site is currently in commercial and residential use with the grade II listed Georgian properties hosting a mix of commercial uses on the ground floor and residential uses above, but it is important to note that its emerging context is rapidly changing with the Tottenham Hotspur Football Club stadium and related ancillary buildings now dominating the street scene of the east side of the High Road .</p> <p>Properties at Nos 819-821 are grade II listed as an early C18, relatively well-preserved pair of three-storey Georgian townhouses with late C19 shops on the ground floor and a symmetric façade composition complemented by original features. These buildings have been progressively converted, redeveloped, altered externally and to a greater degree internally and have lost their original use. But despite all these alterations this pair retains many original C18 features and the legibility of their original façade and spatial composition that still contribute to their special interest and historic character. These properties are in relatively good conditions having been in continued use over recent years and have benefited from regular standard maintenance after having been substantially refurbished in the late 1980s. The shopfronts have been partially altered, then reconstructed and have lost</p>	<p>Noted.</p> <p>The Officer states that the proposals would largely conserve the significance of the listed and locally listed buildings, would enhance the quality of this part of the conservation area and would significantly enhance the setting of both listed and locally listed buildings.</p> <p>However, the erection of new, large buildings at the back of the High Road and the proposed demolition of the locally listed building at 829 High Road will lead to a low level of less than substantial harm to the significance of the Conservation Area.</p> <p>The low level of less than substantial harm would be outweighed by the public benefits of the proposal which include the heritage benefits referred to.</p>

the original decoration and architectural qualities. The significance of the listed houses rests on their most intact original features that bear high aesthetic and historic value, while their surviving shopfronts are of medium value both in their own right and as a group. The submitted maps showing the historic development of these buildings and their hierarchy of significance are very clear and detailed and seem to have positively informed the development proposal so to retain, enhance and where necessary reinstate the original features of these unique buildings.

The locally listed C 19 buildings at 823 - 829, although of more modest intrinsic architectural and historic special interest, are interesting two-storey buildings that bear group value and positively contribute to the varied character of the Conservation Area. The properties have been internally and externally substantially altered over the centuries, substantial roof replacements and repairs have been carried out, however the elevations and related architectural features are in generally good conditions with some decay towards the top and to the shopfront apparently due to roof defects. Insensitive rendering has generally obscured some of the decorative features to front and both front and rear elevations seem to suffer from water infiltration due to poor roof detailing. The rear of these buildings are altered and cluttered, obtrusively located satellite dishes and services contribute to detract from the character of the buildings, while property at No 829 is a poor quality early C20 replacement building, with later flat roof and flat roofed extensions along Brunswick Square.

The significance of the buildings at 823-827 High road derives from the quality of their facade composition, architectural detailing, and surviving C 19 shopfront that positively contribute to the street frontage of this part of the Conservation Area. These buildings have medium aesthetic and historic value consistently with their local listing and importance.

The site is also located in the setting of some of the most highly graded and best-preserved Georgian houses forming part of the remarkable Northumberland terrace at Nos 790-810, located on the opposite side of the Tottenham High Road frontage.

And despite being predominantly located behind the High Road and being barely visible in views across the conservation area, the development site forms part of the fruition and experience of the Conservation Area since it can be accessed from the High Road through the Brunswick Square alleyway to the north and via Percival court to the south.

#### Comments

The development scheme forms part of the wider regeneration strategy and emerging built scenario for the area as set out in the High Road West Masterplan Framework that does not include the High Street frontage, but provides guidance in terms of massing, heights and uses for new development to be enabled at the back of the historic frontage of the High

	<p>Road with new buildings that sensitively complement the established urban scale with a transitional new height.</p> <p>The principle of redevelopment with a progressive increase in height on the currently light industrial site at the back of the historic frontage descends from the adopted masterplan and is therefore accepted in principle from conservation grounds.</p> <p>Map regression, condition surveys and historic evidence accompanying the application, convincingly demonstrate that the progressive alteration of the historic buildings still surviving on site and the deterioration of both the architectural and urban design qualities of the site at the back, which has slowly yet dramatically shifted from its originally Georgian and Victorian residential character to the current very utilitarian light industrial character, provides an opportunity for enhancement of the adjacent heritage assets through well-detailed and sensitive refurbishment and high quality redevelopment in their setting.</p> <p>Accordingly, the proposed works include internal and external alterations to grade II listed buildings at Nos 819 - 821 High Road so to enable the conversion of these properties into residential and leisure venue. The proposed scheme also includes the demolition of the locally listed building at No 829 High Road, the demolition of the existing buildings and structures located at the back of these listed and locally listed buildings so to enable the erection of a residential-led, mixed-use development gradually raising in height in compliance with the masterplan guidance and comprising residential units, flexible commercial, business, leisure and service uses as well as hard and soft landscaping, parking, and associated works.</p> <p>The design proposal has been progressively developed in consultation with the council with a consistent focus on the development potential offered by the industrial site at the back of the Conservation Area frontage and the need to retain the special interest and significance of both the Conservation Area and its contributing designated and non-designated heritage assets. Although the pre-application consultation with the council has not reached an agreement on the fully developed design for the new buildings and landscaping along Brunswick Square where further design refinements may be desirable as per design officer's comments, the overall scale, mass and gradual increase in height of the proposed buildings have been amply discussed, explored and tested in contextual elevations, cross-sections and views taken both across the Conservation Area and along its historic frontage and have convincingly demonstrated that the impact of the proposed development on the heritage frontage of the High Road is modest, especially in comparison to the much taller and denser emerging development envisaged by the masterplan for this regeneration area,</p>	
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and would lead to a low level of less than substantial harm to the significance of the Conservation Area.

The impact of the proposed new increasingly taller buildings on the setting of the historic frontage of the Conservation Area is mitigated by the careful increase in mass and heights of the new development that is well set-back from the street frontage while the proposed landscaping works improve the public realm and connectivity between the High Road and the new development.

The submitted heritage statement amply articulates the heritage significance of the affected heritage assets and assesses the impact of the proposed refurbishments, demolition works and erection of new buildings on the listed and locally listed properties.

The proposed works to grade II listed 819-821 High Road will reinstate the original use of the buildings and will unveil their original architecture as fully legible and separate from the new development despite the overall increase of scale and height at its back and a progressively taller and more densely built wider context, by reversing those unsympathetic alterations that have been cumulatively carried out to the townhouses over many years, including removal of the rear extensions, the flat felt roof, cement render, overpainting, prominent services, satellite dishes and cabling. Heritage sympathetic repairs and reinstatement of original external and internal features, the removal of clutter and unsightly extensions, the reinstatement of the historic layout of the upper floors would be of benefit. The redevelopment at the rear of 819-821 High Road will improve the built as well as the hard landscaped private and public spaces surrounding the listed buildings building would be enhanced by the repairs and refurbishment.

The proposed works to the locally listed buildings at Nos 823-827 will declutter their frontages and rear elevations by removing unsympathetic extensions, doors and windows and will repair their historic fabric and facades, will sensitively reinstate original chimneys, doors, windows, and fixtures this leading to a significant enhancement of the quality of these buildings.

The locally listed building at 829 High Road is a much altered and poorly designed Edwardian building that has lost the majority of its original features such as roof, chimneys, elevations and has low heritage value. As a corner building fronting the High Road in Conservation Area and extending to the rear along Brunswick Square, Its proposed demolition has been debated throughout the pre-application process and although undesirable, is proving necessary to create an appropriate vehicle and pedestrian access to the development site from the High Road along Brunswick Square which is currently poorly maintained and insufficient to provide public access and to maximise the importance of

	<p>Brunswick Square as a key east-west pedestrian route that connects the High Road with the remainder of the masterplan area to the west. The loss of this locally listed building of modest heritage value and the alteration of the narrow alleyway at Brunswick Square, both meant to be positive components of the character of the Conservation Area, would lead to a low level of less than substantial harm to the significance of the Conservation Area, however we agree with the findings of the submitted heritage statement and impact assessment that highlight how this low level of harm, besides being justified and necessary to provide adequate access to the development site, would be outweighed by the proposed enhancements to the fabric and setting of the more valuable heritage buildings, by the provision of a well-designed access route into the site and by descending public benefits.</p> <p>The proposed redevelopment of the industrial site, together with the proposed refurbishment of the listed and locally listed buildings that significantly contribute to the street frontage of the Conservation Area and the landscaped reconfiguration of Brunswick Square would largely conserve the significance of the listed and locally listed buildings, would enhance the quality of this part of the conservation area and would significantly enhance the setting of both listed and locally listed buildings. However, the erection of new, large buildings at the back of the High Road and the proposed demolition of the locally listed building at 829 High Road will lead to a low level of less than substantial harm to the significance of the Conservation Area and the test set out at paragraph 196 of the NPPF should apply with due consideration of the heritage benefits and wider public benefits provided by the proposed scheme.</p>	
LBH Design Officer	<p><b><u>Summary</u></b></p> <p>These proposals are a well thought through and elegantly designed response to this site, that will play a part, along with other neighbouring sites also anticipated to be redeveloped, like this proposal in accordance with the adopted masterplan, as it continues to evolve, in accordance with changed priorities and conditions, to contribute to a more sustainable, viable, inclusive and appealing North Tottenham community.</p> <p><b><u>Principal of Development, and Masterplanning and Street Layout</u></b></p> <p>1. The site forms part of Site Allocation NT5 from the Tottenham AAP (adopted July 2017) and the related High Road West Masterplan Framework and the proposals are broadly in accordance with those. It also more closely accords with the masterplan that these applicants have developed forward in their further applications for the other plots of land within High Road West they own, the Goods Yard to the west, Depot to the north and no 807 to the south of this site. It also broadly, though not perfectly,</p>	<p>Following receipt of these comments the applicant submitted revised drawings which addressed the following:</p> <ul style="list-style-type: none"> <li>- Privacy of adjoining residential properties to the north of Brunswick Sq. – all fully glazed windows to habitable rooms within the 'link knuckle building' are now to the south, east or west.</li> </ul>

	<p>accords with the ned masterplan prepared by rival developers Lendlease for the whole of the High Road West allocation.</p> <p>2. The proposals would form most of a complete city block in the wider High Road West area, consisting of retained and restored existing buildings on the High Road and new build forming extended street frontages to the south side of the existing Brunswick Square alleyway and part of the north side of the existing Percival Court alleyway. The final side of the block would face the existing Peacock Industrial Estate. However, in the context of all of the envisaged masterplans, Brunswick Square and Percival Court would be extended as east-west streets further into the development and the boundary of this site and the Peacock Industrial Estate, the western edge of this proposed city block, would form a major north south street connecting White Hart Lane to the south to a major new public park starting at the north-west corner of this site and extending north.</p> <p>3. All the approved and emerging masterplans contain vision for heights where height rises slowly from the retained existing 2-4 storey High Road (and White Hart Lane) frontages through mansion blocks of 5-8 storeys to tall and taller buildings only along the far western edge of the allocation site, against the railway (and away from White Hart Lane). This applicant's original proposals for this site would have had a taller building in the north west corner of this site, contrary to all the various masterplans but they felt taking advantage of the long vista of the planned park. However we were able to discourage them from breaching the masterplanned heights, and these proposals are in height also in accordance.</p> <p>4. Finally on masterplanning, all the proposed masterplans envisage a significant element of employment on the High Road frontage and immediately behind it, and this proposal contains a cinema, which would provide significant employment. There are no courtyard spaces connected to the street network, as suggested to be envisaged in the adopted masterplan framework and the Lendlease proposals, but the importance of this element has diminished as it has become clear that several of the other landholdings along and behind the High Road will not be part of any of the current active proposals.</p> <p>5. It will be important to ensure that the street frontages along the western edge and at the south western corner (the continuation of Percival Court), which are shown as semi-private, landscaped entrance courts and paths in the interim state, before neighbouring sites, particularly the Peacock Industrial Estate, are redeveloped, can be converted to public highways, fully public city streets, without any impediments, freely</p>	<p>- Privacy of adjoining residential properties and not prejudicing potential development to the rear of 813-817 High Road – all Living/ Kitchen/ Dining Room glazing has been located away from the south façade and bedrooms have been further set back wherever possible.</p> <p>- The applicant has also committed to resurfacing Percival Court and Brunswick Square through s106 obligations which should help to ensure that the public realm created by this development is adoptable or indistinguishable from the public realm in the rest of the wider masterplan, with matching surface treatments and street furniture and no restrictions on access and use different to the rest of the completed masterplan.</p> <p>Therefore the points raised have been addressed.</p>
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connecting to those neighbouring developments as soon as those neighbouring sites come forward.

**Street Layout and Public Realm**

6. The High Road frontage represents the primary frontage of this development and is the most durable and simple to resolve side to the development. The existing buildings on the site along with the rest of the properties along this and the opposite side of the High Road, effectively from just north of the Tottenham Hotspurs Stadium to the south, as far as just south of the boundary of the borough to the north, form a consistent, well enclosed and defined “village core” to the North Tottenham Conservation Area and commercial heart of the local community, with a consistently built-up urban wall of buildings, many over 200 years old, including a high number of notable Statutorily and Locally Listed Buildings. The building line narrows the street at either end but widens out for much of the middle, including this site, the pavements are wide and have been recently and regularly repaved in high quality durable pavement requiring no improvement. In retaining and reusing nos. 819-827 with active frontages to public uses, this proposal will strengthen this good quality high street frontage.
7. The narrow entrances to the existing alleyways of Brunswick Square and Percival Court, like others along here, strengthen the sense of enclosure and distinctiveness of this stretch of the High Road. It is therefore regrettable that the applicants have found it necessary to propose demolition of no. 829, in order to make the entrance to Brunswick Square wide enough for essential servicing including fire engine access. In urban design terms this reduces the sense of enclosure, the fairly consistent street wall and the distinctive difference between this open-yet-enclosed stretch of the High Road and the narrow, claustrophobic alleyways. However the proposal includes an archway over most of the width of no. 829, which will re-establish much of the sense of enclosure and street wall and provide a clear threshold transition to Brunswick Square.
8. The quality of the public realm and enclosing building architecture of both alleyways, Brunswick Square on the northern edge of the site and Percival Court just to its south, are mostly pretty bad, with unmade surfaces to some parts, poor quality tarmac to others, and complete lack of separate pedestrian pavement, whilst the enclosing buildings include blank walls, grills, and shuttered doors in buildings of poor quality, badly maintained materials and finishes. Therefore notwithstanding my regret at the necessary widening of the entrance to Brunswick Square the development will *hugely* improve that side of the alleyway, with active frontage animated by entrances and ground floor windows, overlooking from residential windows and balconies on floors

	<p>above and <i>much</i> improved surface materials, new street trees and street furniture to the part of their site they propose adding to the width of Brunswick Square, also providing a safe pedestrian zone.</p> <p>9. Nevertheless it is regrettable that the applicants have not agreed to improve the <i>whole</i> of the surface of Brunswick Square in the same materials (or similar matching but of adoptable standards, as it is Adopted Highway). It is also a shame that the existing buildings on the north side are generally of a poor architectural quality, although it does include one active shopfront, making what's currently the only good contribution to the streetscape of either alleyway. It is also regrettable that they have not agreed to contribute to improve Percival Court, although that is understood to be trickier as it is not adopted and of uncertain ownership, but it would be preferable if the area of turning head / circulation space in their south-west corner were detailed as a continuation of the public realm of the alleyway, albeit in better materials, and not gated. It should be noted this also provides access to residents parking, although there will only be 8no spaces, for disabled residents.</p> <p>10. The path up their western side, labelled as "Peacock Mews", is intended as the "meanwhile" public approach to the front doors of the ground floor maisonettes along that side, and is carefully and considerably detailed to provide a screen at ground level between those residential approaches, front doors and windows and the industrial activities of the neighbouring Peacock Industrial Estate. It is also capable of easily transitioning into being just the pavement along the east side of the primary north-south street into the future development of the rest of the High Road West masterplan. The including of small ground floor commercial units at both north-west and south-west corners of the proposal would form ideal traditional "corner shops", and if viable would further help integrate this into the completed masterplan and make a vibrant contribution to the new neighbourhood.</p> <p>11. However it is important to ensure by condition or otherwise that the public realm created in this development as extensions to Percival Court and Brunswick Square and their new Peacock Mews can be adopted or incorporated into the public realm of the wider masterplan, with matching surface treatments and street furniture and no restrictions on access and use different to the rest of the completed masterplan. I would recommend that the two alleyways, Brunswick Square and Percival Court, should eventually become pedestrian and cycle only at their eastern end, and otherwise have pedestrian pavements in the same stone or block paver and level (marked by a small kerb) as the vehicular roadway, whilst the street to the west of this site could be conventional.</p>	
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**Height, Bulk & Massing**

12. As mentioned above, the proposed height of the proposal confirms to what is envisaged in the masterplans with lower rise to match the retained existing High Road fronting buildings closest to them, then rising gradually to four, five and six storeys around the podium courtyard and seven at the north-western corner, an acceptable height within the meaning of the “mansion block” typology. These heights are likely to fit in well with the rest of the masterplan, in which ever detailed form.
13. In terms of bulk and massing, the proposals step in on all sides form the applicants red-line boundaries, although this is driven as much by necessity, to provide access, servicing and fire compliance, as it is inspired by a desire to avoid overcrowding the surroundings. Nevertheless the scale and bulk proposed is appropriate to the intended street frontages concerned, with the intended street to the west, where the proposed bulk and height of development is greatest, being the wider and more important, conventional street, and the scale and bulk of the Brunswick Square frontage here proposed noticeably reducing in both eight and plan depth, commensurate with it being a narrow, tighter alleyway; even in its proposed, wider state.
14. Two podium courtyards are proposed from 1<sup>st</sup> floor up; to the front (east) a mostly green-roofed, partly glazed and mostly inaccessible “lightwell” between the back of the retained High Road buildings (their later rear extensions having been removed) and the “central” residential wing that would also have gaps to its northern and southern sides; to the back (west) a mostly enclosed podium garden. The eastern lightwell would be of irregular shape, taking up the difference in alignment between the existing buildings on the High Road and the new, aligned with the western boundary (and future street), allowing the western podium garden to be rectangular and reasonably spacious.
15. To the south, their boundary steps away from Percival Court, around nos. 813-817 High Road and their long rear projection that forms the northern frontage to most of Percival Court. This neighbour fills their site apart form a small, part covered yard at the western end, but is of only one storey and modern utilitarian construction, apart from the 3 storey Georgian High Road frontage. The proposal creates a narrow servicing and fire escape passageway between along their southern boundary. The eastern podium is open to the south, maintaining a separation to 813-7 except where 819 is joined on as existing. The northern side of the eastern podium is only enclosed by a two storey maisonette with a gap to the rear of the existing 827 and a glazed link

	<p>to the rest of the new development, giving the separation between the existing High Road frontages of heritage significance and the main new build a spacious quality.</p> <p>16. Nevertheless, the southern end of the central wing and southern wing, enclosing the western court, form a close neighbour to the rear part of the side of 813-7, currently single storey but with its own development potential that could be impinged by this application proposal. The southern wing of this application scheme is also only of shallow plan depth and steps up gradually from a low three storeys at the southern end of the central wing, to five storeys only close to where it meets the western side, so that the south-eastern corner of the western podium garden gets only two storeys.</p> <p>17. However any development on that site would also be bound by the adopted masterplan, including maintaining a respectful lower of matching height to their High Road frontage until at least well back into their site. This application scheme contains a gap within their land between the rear of 813-7 and the projection at their south-western corner where they step out to the building line of the north side of Percival Court. The taller four and five storey parts of the southern wing (where there is one single aspect south facing flat on the 1<sup>st</sup> &amp; 2<sup>nd</sup> floors) would look onto the gap rather than the rear of 813-7. The proximity of this proposal can be seen as acceptable provided it is accepted that some rooms in this south-eastern corner, where flats would have dual aspect onto one of the two podia, could be very close to a reasonable neighbouring development.</p> <p>18. At both western corners, the proposals rise up and mark the corners with an extra storey (six at the southern end, seven at the northern), marking what will become, in the masterplan, significant crossroad street corners and in the northern case also the southern end of the proposed new public park. In urban design terms this is an appropriate response to their intended location. They also mark the culmination of the very gradual stepping up and significant separation of new built form from the historic existing High Road frontage.</p> <p><b><u>Form, Composition and Materiality</u></b></p> <p>19. These proposals follow a brick based architecture, using a simple palette of bricks suggested to be in harmony with those found in the surrounding neighbourhood, particularly in the High Road, most of which is an important Conservation Area with a number of statutorily listed buildings. This is proposed to be mostly a fairly dark, red brick around the northern, western and southern “outer” facades, with a lighter, buff brick onto the podium courtyards and the first floor of the bit linking the new build to the rear of 827 on Brunswick Square.</p>	
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20. A mid-tone, red-brown metal cladding is proposed for the several places with a set-back top floor; to the link element at the rear of 827 and to the taller elements along the western end of Brunswick Square, around the corner, down the whole of the western side and to the corner of Percival Court. This will act as a roof-like element and give an apparent lightness and apparent lower height to these, as well as giving a more pleasing proportioning, of “Base”, “Middle” and “Top” to these somewhat taller elements, consistent with the “mansion block” typology.
21. The “Base” is the other part of that elevational grading and is here expressed sometimes in recesses and in use of a dark grey brick, occasionally both; the recesses elegantly house and reduce the prominence of potentially ugly and frontage deadening necessary ground floor bin store, bike store and plant room doors, as well as coordinating with shopfronts. This leaves a “Middle” that varies from one to three, four and five storeys each of regularly spaced and sized window openings, often set within a recess of the same metal cladding as the Top, giving them a consistent, elegant, vertical proportion.
22. The Middle sections of the proposed elevations are further embellished with a series of stacks of recessed balconies; at each outside corner of the outer red brick perimeter and in four regularly spaced stacks along the longer western façade, dividing that latter façade into an orderly, rhythmic, façade that also mark the recessed front doors to the ground floor maisonettes to this façade. The northern, Brunswick Square façade also contains one further, striking element; a two storey high arched opening. This provides both access to further servicing (gated) and a glimpse into the podium garden; and out from that garden down to the street, also potentially a surprising and pleasing shaft of light into the narrow street.
23. Overall, one can consider that whilst the form and composition of the proposal is complex and filled with subtle touches of cleverness, this is necessary and appropriate to respond successfully to the complex context, of dramatically different and challenging existing neighbours to all four sides, including the rear of the high quality, heritage significant buildings on the High Road and narrow alleyways to the north and south, as well as the likelihood of some of the surrounding context changing dramatically in the relatively short term. They are better not considered by their elevations so much as by their likely glimpsed views and key corners, as demonstrated in the elegantly urban views of the proposals in the applicants Design and Access Statement.

**Residential Quality (flat, room & private amenity space shape, size, quality and aspect)**

	<p>24. 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>25. All dwellings (excepting flats converted from the listed nos. 867 &amp; 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 onto internal courtyards. 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>26. 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 proposed development is inevitably aligned to east-west streets. All other flats and maisonettes are at least dual aspect, some triple aspect, a good achievement in such a high density urban development. There are a small number of flats to the south-eastern corner that could be improved in layout by being rearranged to provide better access to daylight, amenity and privacy, and it is to be hoped this can be achieved in minor amendments and conditions</p> <p>27. There is some access to doorstep private communal amenity space, including doorstep playspace, in the western podium courtyard. Nevertheless, the development is typical of ones on or immediately behind busy high street frontages that it will rely on private balconies and access to existing public amenity, as well as, particularly in this case, planned access to the high quality public amenity planned to be delivered in the wider masterplan. This less than perfect access to outdoor amenity must be balanced against better than normal access to the amenities that being right on a high street frontage provides; shops, eating and drinking places, services and public transport.</p> <p><b><u>Daylight, Sunlight and Privacy</u></b></p> <p>28. 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>	
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	<p>29. The applicants' assessments were carried out against both the existing and planned positions, including nearby approved proposals and proposals currently in for planning, including the "Goods Yard and Depot Site" subsequently refused permission, but not against likely developments not currently firmly proposed within the masterplan area, nor the massing of the approved masterplan. This is likely to have made good day and sunlight harder to achieve than the existing condition, but it could be that subsequent developments elsewhere will be detrimental to day and sunlight in this development. There could be an argument that as the first to come forward, this development would have the right to "take the light", but the applicants' consultants acknowledged in their report that the Enterprise House appeal decision (Appeal Ref: APP/E5900/W/17/3191757) requires developers to consider reasonable development expectations on neighbouring sites by at least assessing their proposals against a "mirror development" of their proposals on neighbouring likely development sites. This has been done for assessing the impact of this proposal on neighbouring existing buildings, but not for assessing the impact of likely future neighbouring developments in this development, or of the likely impact of this proposal on likely neighbouring developments.</p> <p>30. Their assessment finds good levels of daylight and sunlight achieves throughout the proposed development, with of the 212 habitable rooms assessed, 165 (78%) would satisfy the BRE guidelines for Average Daylight Factor (i.e. 2% ADF target for Living-Kitchen-Diners and Kitchen-Diners), with six of the Living-Kitchen-Diners and Kitchen-Diners that fail to achieve 2% meeting the more reasonable standard for living rooms of 1.5%. 16 dwellings would have a living room (or Living-Kitchen-Diners) that failed to achieve 1.5%; of these, 13 contain a kitchen area towards the darker back of the living-kitchen-diner; if those areas were excluded, 6 of them would pass, 3 more nearly so. This leaves just seven flats with poor daylight to their living rooms.</p> <p>31. For sunlight to their proposals, their assessment finds that 54 main living rooms that have at least one window facing within 90 degrees of due south, 32 (59%) will satisfy the Annual Probable Sunlight Hours guidelines with a further 12 (22%) meeting the guidelines for winter sunlight. In accordance with the BRE Guide, this excludes rooms that are not living rooms or that do not face within 90degrees of south. If an alternative target value of 15% APSH, with 3% APSH in the winter months, was considered an acceptable alternative target for an urban area, 42 (78%) of the main living rooms which have at least one window facing within 90 degrees of due south would satisfy that alternative target, which is a significant improvement. The test for sunlight to the principle amenity spaces show that the main podium garden just</p>	
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	<p>passes the standard for 505 sunlight for 2 hours on 21st March (51% being the result).</p> <p>32. The assessment of the impact of these proposals on existing neighbouring developments shows that there would be a noticeable loss of daylight and no neighbouring existing living rooms would lose noticeable sunlight, namely: 831-833 High Road, 813-817 High Road and 811a High Road. In the case of 831-833, which is on the north side of Brunswick Square, the loss would be the same for a mirror image of their building on the applicants' site, so the loss is not unreasonable and currently benefits from unexpectedly good daylight due to there being only single and two storey buildings opposite them on the application site. To 813-187 one living room would lose a barely noticeable amount of daylight, taking it down to nearly 26% Vertical Sky Line (just below the 27% recommendation); only bedrooms would lose more and then not catastrophically so. The rooms affected in 811a are in an unbuilt proposed development and would retain a good VSC of the low 20s%.</p> <p>33. 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. In this case, the levels of day and sunlight achieved are reasonable, if not great (when concerns at the full effects of likely neighbouring developments are born in mind), but this should be balanced against being part of a vibrant high density development right on a busy high street, and as part of a masterplan that will deliver significant public realm, public amenity and regeneration benefits.</p> <p>34. Privacy between dwellings within the development is tight, as is inevitable in a fairly high density, low rise development, and is most probably similar to those existing dwellings in close proximity to the High Road, but there are relatively few existing residential dwellings in close proximity. There are existing 1<sup>st</sup> and 2<sup>nd</sup> floor flats over the High Road frontage in 813-817 immediately to the south of the application site, with windows facing west across the roof of their single storey rear extension, south-east of this proposed development, as well as 1<sup>st</sup> and 2<sup>nd</sup> floor flats over the High Road frontage of 831-833 High Road, on the north side of Brunswick Square,</p>	
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	<p>immediately north of the development. There is also a permitted development on the south side of Percival Court (807 High Road) containing residential 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> floor windows facing north. No existing external amenity spaces would be overlooked.</p> <p>35. Both the cases on the opposite sides of the alleyways should have less expectation of privacy from windows facing the street, but across an alleyway with close proximity, greater effort should be made to avoid overlooking. Nevertheless the distance of the proposal from both 807 and 813-817 is approaching or over the 18m beyond which the human face cannot be recognised, normally considered the threshold over which distance confers privacy. The only privacy issue would seem to be for 831-833, and only from one flat, the four bedroom maisonette in the “link” building between the main quadrangle and the rear of 827, which would have all its bedroom windows, two of its four living room windows and its roof terrace close to the existing dwellings’ windows. It is therefore recommended that this small element of the design should be modified.</p> <p>36. And consideration of the effects of wind microclimate or other environmental effects would not be relevant to the design assessment on this low to medium rise development.</p> <p><b><u>Conditions and Informatives</u></b></p> <p>37. The proposals are very close to being an exemplary design in every way, but contain an number of small flaws and concerns, that could be addressed by conditions, informatives or undertakings to amend the scheme or give reassurance by the applicants, namely:</p> <ul style="list-style-type: none"> <li>• Ensure public realm created by this development is adoptable or indistinguishable from the public realm in the rest of the wider masterplan, with matching surface treatments and street furniture and no restrictions on access and use different to the rest of the completed masterplan;</li> <li>• Amend the layout of flat PW-L01-BX-01 to protect the privacy of existing dwellings in no. 831-833 High Road; and</li> <li>• Amend the layout of flats PW-L01-B-04, PW-L01-C-04, PW-L02-B-04, and PW-L02-C-06, to protect the development potential of the rear of 813-817 High Road.</li> </ul>	
<p>LBH Local Lead Flood Authority/Drainage</p>	<p>The LLFA, has now reviewed application HGY/2021/2283 – 819 – 829 High Road. N17 8ER. – Full planning application for the demolition of existing buildings and structures to the</p>	<p>Noted the applicant has followed the London Plan</p>

	<p>rear of 819 – 829 High Road; demolition of 819 – 829 High Road; and redevelopment for a residential-led, mixed-use development comprising residential units (C3), flexible commercial, business and service uses (Class E), a cinema (Sui Generis), hard and soft landscaping, parking, and associated works. To include the change of use of 819 – 829 High Road to flexible residential (C3), cinema (Sui Generis), and commercial business and service uses (Class E).</p> <p>The site is located in flood zone 1, which has a low probability of flooding from tidal surges or rivers flooding. The site has limited opportunity for above ground SuDS, the applicant has followed the London Plan hierarchy and has selected SuDS, that include green/blue roofs at podium level, attenuation tanks, permeable paving throughout the site and tree pits. The surface water will be discharged at a restricted rate of 5l/s to the Thames Water, public sewer subject to consent from Thames Water to connect to their network.</p> <p>A management maintenance schedule has been provided, can confirmation be sought as to who will be maintain the SuDS, that must be in place for the lifetime of the development.</p>	<p>hierarchy and the proposed SuDS features are acceptable subject to management and maintenance being secured by condition.</p>
<p>LBH Education (School Places Planning)</p>	<p>I don't have any specific comments from a school place planning perspective and am satisfied that we have sufficiency of school places in this planning area to cope with the additional child yield from this development.</p>	<p>Noted</p>
<p>LBH Public Health</p>	<p>Housing quality and design Key things we would like to see:</p> <ul style="list-style-type: none"> <li>• Details of the specific room sizes of the flats</li> <li>• Rooms meet the daylight and sunlight hours</li> </ul> <p>Comments: We have reviewed the Daylight and Sunlight Report:</p> <ul style="list-style-type: none"> <li>- Page 25 "Table 4 shows that of the 212 habitable rooms assessed, 163 (77%) would satisfy a strict application of the BRE guidelines for ADF. The Printworks building shows 77% adherence and the High Road buildings 71% adherence."</li> <li>- PRINTWORKS: <ul style="list-style-type: none"> <li>o Floor 1 - R21 LKD 0.4% ADF</li> <li>o Floor 2 –R19 LKD 0.63% ADF</li> </ul> </li> <li>- High Road Building: <ul style="list-style-type: none"> <li>o Floor 1 R11 Bedroom 0.5% ADF</li> </ul> </li> <li>- The daylight for the above mentioned is of particular concern. Further mitigation measures need to be in place to improve the quality on lighting. It may be possible considering having fewer units on the lower floors to meet the daylight and sunlight hours for all rooms.</li> </ul>	



- As highlighted in the GLA 'Good Quality Homes for All Londoners DRAFT Guidance', "The provision of single-aspect dwellings should be avoided. Where flats per floor exceed four, single-aspect flats are inevitable. In the exceptional circumstances where single-aspect dwellings are provided, alternative prospect should be offered to reduce the detrimental effects e.g. by articulating the building line or creating bays to allow for windows on a perpendicular facade. North-facing and south-facing single-aspect dwellings are likely to suffer from inadequate natural light and the potential for overheating respectively. Residents living in single-aspect dwellings orientated towards sources of noise, air and light pollution are likely to be consistently exposed to harm reducing their quality of life". We have seen the accommodation schedule report which highlights all rooms do meet the nationally described space standards. The concern is with the amount of flats per level – as the 'Good Quality Homes for All Londoners Guidance'.

- Level 1 17 flats
- Level 2 18 flats
- Level 3 17 flats
- Level 4 11 flats
- Level 5 6 flats
- Level 6 1 flats

Furthermore and as above, we are also concerned with the number of flats per floor, particularly:

- Level 1 17 flats
- Level 2 18 flats
- Level 3 17 flats
- Level 4 11 flats

Policies/Guidance:

- Haringey's Development Management Local Plan Policy.
- Neighbourhoods for life: A checklist of recommendations for designing dementia-friendly outdoor environments.
- Good Quality Homes for All Londoners Guidance, GLA

Access to open space and nature

Key things we would like to see:

- Range of formal and informal play spaces and equipment which should be age appropriate. The location of open spaces should avoid isolating specific areas and spaces to increase safety.

• Opportunities to Integrate play spaces with other related health and environmental programmes such as food growing

Comments:

There is a lack of green spaces in Northumberland Park and it is positive to see the applicant has integrated public realm and play space with a number of trees.

Air quality, noise and neighbourhood amenity

Key things we would like to see:

- Construction management plans should lessen construction impacts, particularly air quality, construction traffic movements, noise levels, hours of working

Accessibility and active travel

Key things we would like to see:

- Details on the safety measures of the cycle storage/parking spaces

- Easy access to the cycle storage; single semi-transparent door and light sensors

Layout of the cycle racks. Safe and well-lit walking routes and keeping entrances in open sight lines (avoid entrances located at the back of the building)

Policies: 2016 London Cycle Design Standard, Haringey Transport Strategy

Crime reduction and community safety

Key things we would like to see:

- Development proposals incorporate 'secured by design' principles. Planners can work with the police to get their advice on development proposals

- Clear sight lines

- Security and street surveillance – the design and layout of commercial and residential areas can ensure natural surveillance over public space.

- Active use of public spaces with effective lighting – avoid lighting that can cause fear of crime to residents (e.g. bollard lighting)

Policies/Guidance: Planning applications should consider the new contextual safeguarding framework. Further information and resource can be found on the Contextual Safeguarding website: <https://www.contextualsafeguarding.org.uk/>

Access to work and training

Key things we would like to see:

- The provision of local work can encourage shorter trip lengths, reduce emissions from transport and enable people to walk or cycle

- Providing job opportunities for professionals and apprenticeships

Social cohesion and lifetime neighbourhoods

Key things we would like to see:

- Mixed-use developments in residential neighbourhoods can help to widen social options for people.

	<ul style="list-style-type: none"> <li>• Provision of a range of diverse local employment opportunities</li> <li>• Intergenerational mixing to improve community cohesion and inclusive and Age-friendly design</li> <li>• Connectivity and permeability reducing community severance</li> </ul> <p>Minimising the use of resources Key things we would like to see:</p> <ul style="list-style-type: none"> <li>• Require standards and criteria on hazardous waste disposal, recycling and domestic waste to that development proposal. Waste is disposed correctly. Sending out waste from a redevelopment site to be sorted or disposed can increase vehicle movements, emissions and cause significant disruption including noise and dust which can contribute to pollution.</li> </ul>	
LBH Pollution	<p>Having considered all the relevant supportive information especially the Land Contamination Assessment (Phase 1) Revision P03 with reference HRW-BHE-PW-XX-RP-CG-0001 prepared by Buro Happold Ltd dated 29th July 2021 taken note of sections 5 (Preliminary Geo-environmental Risk Assessment) and 6 (Conclusions and Recommendations) and Air Quality Assessment with reference HRW-BHE-PW-XX-RPY1-0001 Revisions P03 prepared by Buro Happold Ltd dated 29th July 2021 taken note of sections 3(Baseline Conditions), 4 (Construction Impacts), 5 (Operational Impacts), 6 (Mitigation Measures) and 7(Conclusions), <b>please be advise that we have no objection to the proposed development in respect to air quality and land contamination but the following planning conditions are recommend should planning permission be granted.</b></p> <p><b><u>1. Land Contamination</u></b></p> <p>Before development commences other than for investigative work:</p> <ol style="list-style-type: none"> <li>a. Using the information already submitted on the Land Contamination Assessment (Phase 1) Revision P03 with reference HRW-BHE-PW-XX-RP-CG-0001 prepared by Buro Happold Ltd dated 29th July 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.</li> <li>b. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.</li> <li>c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and;</li> </ol>	Noted conditions on Land Contamination, Unexpected Contamination, NRRM and Demolition/Construction Environmental Management Plans which are all recommended.

- 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.

**Reason:** To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

**2. Unexpected Contamination**

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.

**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.

**3. NRMM**

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.

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.

**Reason:** To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ

**4. Demolition/Construction Environmental Management Plans**

- 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
- 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.

The following applies to both Parts a and b above:

- a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).
- b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:
  - 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.
- c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:
  - 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

- 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
- vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.
- d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:
  - i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;
  - ii. Details confirming the Plot has been registered at <http://nrmm.london>;
  - iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;
  - 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);
  - v. A Dust Risk Assessment for the works; and
  - vi. Lorry Parking, in joint arrangement where appropriate.

**The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.**

**Reason:** To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.”

**5. Combustion and Energy Plant:**

- a. Prior to commencement of the development, details of the proposed diesel generator must be submitted to evidence that the unit to be installed complies with the Stage IIIB of EU Directive 97/68/ EC for both NOx and PM.
- b. Prior to construction of the development details of its chimney height calculations, diameters and locations must be submitted for approval by the LPA.
- c. The diesel generating plant must not be used either for testing or during emergency more than 18hours per annum as submitted by the applicant in section 5.2 of the AQ report.

**Reason:** To protect local air quality and ensure effective dispersal of emissions.

Informative:

	<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>	
<p>LBH Transportation</p>	<p>Transport Assessment</p> <p>Development Proposals</p> <p>The proposed development is for 72 new dwellings consisting of one to four-bed units, the majority of which within the Printworks building and the remainder in the High Road building. The proposed commercial floorspace fronting the High Road, Percival Court and Brunswick Square, would total 1,574sqm GEA, of which 1,272sqm GEA would be allocated to a cinema (Sui Generis) and the remainder to Class E commercial uses.</p> <p>Proposed General Access Arrangements</p> <p>In the interim state, refuse collection, delivery and servicing, and emergency vehicle access would be via Brunswick Square, where layby loading bays would be located. A footway along the southern side of Brunswick Square would provide a pedestrian route to the Printworks Building. It is understood that 829 High Road would be demolished to that effect as there is currently no footway along the southern side of Brunswick Square. Perceval Court would provide vehicular access from the High Road to the basement car park and could also be used as a secondary pedestrian route to the rear building. Cycle access is proposed to be provided from both Brunswick Square and Perceval Court.</p> <p>TfL has raised concerns about potential conflict between pedestrians, cyclists and vehicles on Brunswick Square and asked that a Stage 1 Road Safety Audit (RSA) be completed. We may look to condition this. Likewise, similar concerns have been expressed regarding access to the car park shared with cyclists. The transport consultants should address this. We are of the view that conflict is likely due to the shared nature of the two main access roads, although we recognise the relatively likely low volume of vehicular traffic especially along Percival Court.</p> <p>Update: We recommend a Combined Stage 1/2 Road Safety Audit planning condition.</p> <p>For information, as part of the planning permission for 807 High Road (HGY/2021/0441), the resurfacing of and improvements to Percival Court have been secured by Section 106,</p>	<p>Following satisfactory responses to queries, no objection subject to recommended conditions and s106 obligations.</p>

which include the resurfacing, provision of a means of surface water drainage and lighting installations.

Would the refuse vehicle overhang the footway and kerb along the High Road at the junction with Brunswick Square on its way in and out? Detailed swept paths showing the kerb and footway in that location should be reprovided.

Update: The requested swept paths for the refuse vehicle were subsequently provided and raised no further comments. The alterations to the kerblines at that junction would have to be included to the S.278 highway works plan in due time.

In the end state, vehicular access would be primarily gained from the network of streets internal to the wider masterplan site, and in particular from the future street bounding the Printworks building to its west. That street would connect to both Brunswick Square and Percival Court. In the end state, Brunswick Square and Percival Court would also connect to the pedestrian and cycle networks internal to the masterplan area, immediately west of the site.

Clarification is needed on the usage of Brunswick Square and Percival Street in the end state. Would Brunswick Square effectively become one-way with access only from the High Road and egress onto the streets internal to the masterplan area? Would Percival Court no longer be used (as the plans suggest) and would vehicular access from and egress onto the High Street be prevented (by physical measures within the application site for example)? More details are required on access controls in the end state and how these would be implemented and enforced.

Update: The proposed access arrangements along Brunswick Square and Percival Court were subsequently clarified and are considered suitable. It is understood that the access arrangements would change between the interim and end states. To enable satisfactory future connections with adjoining land part of the High Road West masterplan area, it is recommended that S.106 planning obligations require a Future Connectivity and Access Plan to be approved by the Council. The Plan would set out how the proposed development would be connected to allow for potential future pedestrian, cycling and vehicular access and egress between the site and the streets internal to the masterplan area.

How the one-way ramp is proposed to work should be detailed – would that involve a traffic light system? Key dimensions of the basement car park should be marked up (aisle and bin widths, parking space dimensions) on the plans.



Update: The proposed operational principles of access to the basement car park, including the entry and exit system and ramp management, were subsequently set out and considered acceptable. It is recommended that a planning condition secure the detailed arrangements for two-way working of the proposed vehicular ramp before occupation.

#### Proposed Cycle Access and Parking

Long-stay residential and commercial cycle parking stores would be provided on the ground floor and accessed from Brunswick Square and Percival Court. Short-stay cycle parking would be provided as Sheffield stands within the site's public realm to the rear of the site (along its western boundary).

Cycle parking is proposed in line with the relevant London Plan (2021) standards and London Cycling Design Standards. However, the calculations for the proposed cinema are based upon the employee density figure of one full-time-equivalent (FTE) employee per 90sqm GIA. A quick look at the Employment Density Guide (2015) suggests this ratio is one FTE per 200sqm GIA. Regardless of this, the long-stay provision associated with the cinema remains unchanged, with 2 spaces.

The number of cycle parking spaces per cycle store and external location should however be indicated on all relevant plans. 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.

Update: The breakdown of long-stay and short-stay cycle parking spaces was subsequently shown on the plans.

#### Proposed Car Access and Parking

Eight wheelchair-accessible car parking spaces would be provided within the basement car park and fitted with electric vehicle charging points. Would there be 20% or 100% of them provided with active charging infrastructure from the outset? The proposed accessible parking provision would be for 10% of the homes which would be wheelchair-accessible. The proposed development would otherwise be car-free.

Update: It was subsequently confirmed that 20% of the spaces would be fitted with active provision from the outset and the remainder with passive provision to be brought into use as and when required.

The site's PTAL ranges from 4 to 5, so we would expect the site to be car-free, as per the maximum residential parking standards for all areas of PTAL 5-6. This aligns with Paragraph 10.6.4 of the London Plan (2021) which states that "When calculating general parking provision within the relevant standards, the starting point for discussions should be the highest existing or planned PTAL at the site." The proposals are therefore compliant with policy.

In line with Policy DM32: Parking of the Development Management DPD, the proposed development would qualify for a car-free status, and the Council would not issue any occupiers with on-street resident/business parking permits/parking permit vouchers 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.

Update: A Car Parking Design and Management Plan was discussed as part of the Transport Assessment and would be secured by planning condition. The Car Parking Design and Management Plan which would be conditioned should include a mechanism whereby wheelchair-accessible car parking spaces could be leased to non-disabled residents should they not be leased to wheelchair users in the first place. This would involve a 'dynamic' strategy to minimise redundancy of spaces and reflect the fact that it is unlikely that all wheelchair-accessible parking spaces will ever be required. It is considered that this level of flexibility should be allowed as the Printworks only have a car parking ratio of 0.1 space/dwelling, which is the absolute minimum. Releasing spaces on a temporary basis for family dwellings on renewable leases would be a good compromise in the absence of additional spaces over and above the provision for the wheelchair-accessible dwellings. It was agreed that this specific mechanism would be incorporated in the wording of the planning condition so it could be picked up in future versions of the document, post consent, if permission were granted.

#### Multi-Modal Trip Generation and Delivery and Servicing Trip Generation

The trip generation methodology is accepted. The loading bay calculation requirement concludes that there would be two layby loading spaces along the southern side of Brunswick Square, which would be sufficient to accommodate the peak demand expected to occur between 11:00 and 12:00.

#### Cumulative Impact Assessment

The cumulative impact assessment of the proposed development with the local committed developments (including the Goods Yard and the Depot) should be undertaken in a more detailed fashion, in parallel with the impact assessment of all modes upon their relevant networks in Section 5.6. It is noted this has also been requested by TfL. It is however recognised that, in isolation, the proposed development itself would have a limited impact, as demonstrated by the high-level assessment in Section 5.6.

Update: At the time of the review, a cumulative impact assessment carried out as part of post-submission work for the Goods Yard and the Depot planning application (HGY/2021/1771) was provided, already including the effects of the Printworks' additional trips upon the local transport networks. The assessment was reviewed to the Council's satisfaction, but subject to TfL's review and satisfaction as well.

#### Delivery and Servicing Plan

A Delivery and Servicing Plan has been provided as a section of the Transport Assessment. Its contents are acceptable. A detailed Delivery and Servicing Plan would be secured by planning condition, its production and iterations would align with the wider phasing delivery of the adjacent Goods Yard and Depot developments.

#### Framework Travel Plan

A Framework Travel Plan has been submitted alongside the Transport Assessment. Its contents are satisfactory. Residential and Commercial Travel Plans would be secured by Section 106 planning obligations.

#### Outline Construction Logistics Plan

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.

The following S.106 heads of terms and planning conditions were recommended.

#### Section 106 Heads of Terms

	<ul style="list-style-type: none"> <li>- Car-free/capped development – both residential and non-residential/business, including £4,000 towards the amendment of the local Traffic Management Order (also covering the cost of any highway restrictions affected by the S.278 highway works).</li> <li>- Car club contributions from developer to residents - two years' free membership for all residents and £50 (fifty pounds in credit) per year for the first 2 years and an enhanced car club membership for the residents of the family-sized units (3+ bedrooms) including 3 years' free membership and £100 (one hundred pounds in credit) per year for the first 3 years.</li> <li>- S.278 highway works agreement – exact scope to be defined upon obtaining S.278 highway works drawing from applicant before estimates can be undertaken by the Council.</li> <li>- Residential and Commercial Travel Plans (both Interim and Full documents, alongside monitoring reports and 2 x £3,000 monitoring contributions).</li> <li>- Future Connectivity and Access Plan (see description above).</li> </ul> <p>Planning Conditions</p> <ul style="list-style-type: none"> <li>- Public highway condition</li> <li>- Combined Stage 1/2 Road Safety Audit – Brunswick Square</li> <li>- Cycle parking details (152 long-stay and 22 short-stay spaces)</li> <li>- Detailed Construction Logistics Plan</li> <li>- Demolition/Construction Environmental Management Plans</li> <li>- Delivery and Servicing Plan</li> <li>- Car Parking Design and Management Plan (including the provision of electric vehicle charging points – both active and passive – and the reallocation of spaces to family dwellings on short-term leases if not taken up by disabled residents)</li> <li>- Basement vehicular access control arrangements (or to be covered by the Car Parking Design and Management Plan only)</li> </ul>	
LBH Waste Management	<p>The waste management document appears to address most of our standard requirements in section 2. My additional offerings given in <u>underline</u> below</p> <ul style="list-style-type: none"> <li>• Residents in Core C and the three south “independently accessible units” on the West side of the Site (PW-L00-AX-02, PW-L00-AX-03 and PW-L00-AX-04) will take their waste to Residential waste store C. <u>Noted that these bins will be presented at front of building on collection day. Is the presentation point on private land still?</u></li> </ul>	<p>Amendments to the plans and the recommended conditions would satisfy the requests.</p> <p>Amendments have been submitted which propose the incorporation of a</p>

	<p><i>Rachel offered an alternative solution, that being these bins can be tucked round by bin store B, off of the main Brunswick Square thoroughfare and more within the land area occupied by the development.</i></p> <p><i>The bins will be pulled to this location by the developments FM team on collection day and returned to bin store C immediately after collection. Once suitable direct access to Bin Store C has been developed in Percival Ct, then direct collection from bin store C will negate the need for this arrangement. I understand the master plan, for which Percival Ct is a part, is being delivered over a 10yr project</i></p> <ul style="list-style-type: none"> <li>• Waste from the units that do not have access to the cores (High Road units) will be stored within the unit and brought out for collection once a week.</li> </ul> <p><u>Assume these properties front a time band collection route?</u></p> <p><u>We remain resistant to any bags having to be presented on the high road. Are there alternatives? Can one of the bin stores be designated? Is there an area where bags could be kept off the highway but easily accessible by crews?</u></p> <p><u>Designating one day a week for time band collections is very practical – collections are twice daily and residents will become aware of this.</u></p> <p><i>I understand that the existing flats-above-shops are inhabited and residents currently present sacks on street during allotted time bands. I also understand, once developed, there will be a reduction in the number of housing units. However, Waste Client’s stance remains that, for all new development, loose waste bags and bins should be kept off streets at all times. I understand the heritage status of the building prevents works to build internal storage and that the only other option is for these residents to use Bin store B, some 60m away from egress points. This is unworkable as a mandatory solution. Whilst our stance remains, I accept there seems to be no viable alternative to these residents continuing to present on street during allotted time bands. Whilst we will endeavour to implement on-street waste containment along this section of High Road, no guarantees can be given at this stage that such a scheme will be adopted.</i></p> <p><i>The suggestion of once per week presentation for a timed collection zone is currently unworkable – could create a larger-than-manageable pile of waste and could not be reasonably enforced as other residents in same scenario can present on 14 occasions per week. However, Rachel’s suggestion to make residents aware that they can use Bin Store B if they wish, is supported.</i></p> <p>The residential units at the Site will require 7m<sup>2</sup> of bulky waste</p>	<p>dedicated discreet and small (but appropriately sized) bin store along Brunswick Square. This would be for the exclusive use the residential flats above the High Road properties and would hopefully address the concerns around the leaving of refuse bags of the High Road.</p>
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	<p>storage. This will be provided in the residential waste store C. <u>Fig 9 of report suggests this will be in store B? If C, then collection/presentation becomes an issue prior to access from Peacock Estate</u></p> <p><u>Welcome the inclusion of a bulky waste store, however, this will need adequate segregation from the 1100L bin area so separate access to bins and bulky waste do not become blocked</u></p> <p><i>Rachel confirmed she will design-in suitable segregation</i></p> <p>Once surrounding developments are complete, Peacock Estate will be available for refuse collection vehicle access. FM will no longer be required to transfer waste from residential waste store C to the collection point on Brunswick Square. Instead, direct collection can then be undertaken by the Haringey waste operatives from all residential waste stores. <u>There's no vehicle access drawings so presuming that has been approved previously? Of course, we will need assurance that clear access can be assured at all times, i.e., bin store entrances are protected from blockages such as illegal parking and the collection vehicle can be guaranteed of uninhibited parking in the collection area.</u></p> <p><i>I understand that this has been agreed in previous meetings/approvals and therefore I will not offer any further comment.</i></p> <p>Waste reduction interventions</p> <p><u>SB - Welcome inclusion of this section and hope it is avidly pursued. Would like to see more support for the residential waste stream, i.e., fixed recycling information displayed on bin store walls and support of waste segregation within the residential units, e.g. commitment to adequate space to separate food, mixed recycling and general waste along with information to greet new residents. Our comms team can help with the latter.</u></p> <p><i>No further comment</i></p>	
<b>EXTERNAL</b>		
Thames Water	<p>Waste Comments</p> <p>We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging</p>	Noted conditions are recommended.

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

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices>.

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

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll

need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

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

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

#### Water Comments

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. The applicant is advised to read our guide working near or diverting our pipes.

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

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at [thameswater.co.uk/buildingwater](https://thameswater.co.uk/buildingwater).

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. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email:

[developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a



	<p>minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>	
<p>Greater London Archaeology Advisory Service (GLAAS)</p>	<p>NPPF section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.</p> <p>The planning application lies in an area of archaeological interest. If you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.</p> <p>The application site lies on the projected line of the Roman road of Ermine Street and remains of the road and contemporary roadside activity can therefore be expected. This potential is illustrated by the Roman finds at Snell Park made to the north of the application site in 1956. Later remains of roadside settlement on the site or in the close vicinity are present in historical records from the fourteenth century and mapped from the seventeenth century.</p> <p>The planning layout offers some theoretical scope to preserve important remains through design behind the High Road frontage.</p> <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' archaeological assessment 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 Pymme's Brook to the north, and the already mentioned presence of the Roman road.</p>	<p>Conditions and informatives attached as recommended.</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, illustrated by the listed buildings on site and nearby and the nineteenth century occupation of the site by the Brunswick Brewery. 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.

Demolition of the locally listed 829 High Road and the rear of 827 High Road would merit recording pre-loss.

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. I therefore recommend attaching a condition as follows:

**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.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- 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
- 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.

**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.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 205.

I envisage that the archaeological fieldwork would comprise the following:

**Evaluation**

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

**Condition Building Recording**

I also recommend that the following condition is applied:

Reason: Built heritage assets on this site will be affected by the development. The planning authority wishes to secure building recording in line with NPPF, and publication of results, in accordance with Section 12 of the NPPF.

Condition: No demolition shall take place until a written scheme of historic building investigation (WSI) has been submitted to and approved by the local planning authority in writing. For buildings that are included within the WSI, no demolition or development shall

	<p>take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and</p> <ul style="list-style-type: none"> <li>A. The programme and methodology of historic building investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</li> <li>B. The programme for post-investigation assessment and subsequent analysis, publication &amp; 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 WSI</li> </ul> <p>Informative: The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited heritage practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.</p>	
<p>Historic England</p>	<p>Thank you for your letter of 9 August 2021 regarding the above application for planning permission. 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> <p>It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.</p> <p>This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.</p>	<p>Noted officers have sought the views of their specialist conservation advisers.</p>
<p>Health and Safety Executive</p>	<p>Thank you for providing an updated fire statement and additional information, which has assisted in clarifying some of the concerns raised in HSE's original substantive response (dated 20/08/2021). For the avoidance of doubt, the comments below are limited to the outstanding matters of concern raised within the original HSE substantive response.</p> <p>The follow up document "211125 - Cover letter - HSE Comments_BH response", related to the initial HSE's substantive response, states: "A description of the fire service access, described in Appendix A, has been discussed with the London Fire Brigade and Building Control on the 26th October 2021. During this meeting, Building Control and the LFB agreed in principle with the proposed fire service access. Letter has been provided in Appendix B." The LPA should satisfy itself that the agreements and assurances about the</p>	<p>The applicant has responded on these points and HBC and LFB remain of the view that the proposed development is appropriate and acceptable in fire safety terms. Whilst Points 1 and 2 are not in strict compliance with guidelines, this is not a definitive requirement and</p>

	<p>deviations from standards reached with London Fire Brigade and Building Control are robust and documented.</p> <ol style="list-style-type: none"> <li>1. Issues which might affect the fire safety of the development       <ol style="list-style-type: none"> <li>1.1. Notwithstanding the assurances provided by London Fire Brigade and Building Control, concerns remain about the length of the horizontal run of the dry fire main (38.6 meters), which is 20 meters longer than the recommended standard.</li> <li>1.2. Notwithstanding the assurances provided by London Fire Brigade and Building Control, concerns remain about the distance that firefighters will have to travel (56 meters) to access the building entrance on Percival Court and the dry fire main inlet, which is 38 meters longer than the recommended standard.</li> <li>1.3. The follow up document “211125 - Cover letter - HSE Comments_BH response” states: “The fire hydrants that are used as part of this development is on the public domain as such is it is expected that those fire hydrants are periodically tested. However, due to the lack of evidence the response “don’t know” was the most adequate. This will be ensured as part of the Building Regulations process and upgraded (or private fire hydrant provided) if necessary.” Whilst this is a valid response on the form, it is not appropriate to this development, which relies heavily on two working fire hydrants for firefighting water supplies to feed the three proposed dry rising mains. Without knowing if the hydrants are useable, the proposal might be relying on a disused water main or faulty hydrant. The LPA may wish to seek information from the applicant about the robustness of the assumptions made in relation to this aspect, to understand better the likelihood of the need for changes that could impact on the landscape and appearance of the development.</li> </ol> </li> </ol>	<p>both HBC and LFB have provided assurances that in respect of both aspects they would be satisfied that the LFB could safely serve what is a tight, urban site in fire safety terms.</p> <p>There must be a recognition that there are evidently site circumstances which dictate a different approach in this instance. In this case, the local parties responsible for considering the appropriateness of the fire strategy and addressing any fire issues on site (i.e. HBC and LFB) have confirmed that the scheme is acceptable.</p> <p>In respect of Point 3, a condition is recommended that requires the developer to show that the proposed public hydrants are operational, or if not demonstrate what the alternative solution is and prove its acceptability.</p>
London Fire Brigade	<p>I have reviewed the information and can confirm that the fire brigade would be happy with the fire fighting access with the system proposed.</p> <p>I’m in agreement with the comments below:</p>	Noted- fire fighting access acceptable.

	<ol style="list-style-type: none"> <li>1. Not so concerned with the 39m distance, as they could have increased the distance from the LFB vehicle to DR inlet to 18m and be more or less near the 18m mark to the vertical riser. If the water pressures are ok and the LFB are satisfied in terms of carrying their equipment, then I would say the proposal could be accepted in this instance.</li> <li>2. There appears to be sufficient hydrants within 90m from the LFB vehicle.</li> </ol>	
<p>Metropolitan Police - Designing Out Crime Officer</p>	<p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>We have met with the project Architects to discuss Crime Prevention and Secured by Design (SBD) for the above development site and have discussed in detail the issues related to the historic nature of the site, it has been noted that the Architects have taken into consideration our departments concerns 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”.</p> <p>At this point it always 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. 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 that should be taken into consideration. The comments made can be easily mitigated if continual engagement prior to commencement and throughout the build our advice is sought. 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><b>Section 2 - Secured by Design Conditions and Informative:</b> In light of the information provided, we request the following Conditions and Informative: <b>Conditions:</b> (1) Prior to the first occupation of each building or part of a building or use, a <b>'Secured by Design' accreditation</b> shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained.</p>	<p>Noted, recommendation includes a planning condition requiring a 'Secured by Design' accreditation to be achieved for each building before the building is occupied and the inclusion of an informative.</p>

(2) Accreditation must be achieved according to current and relevant Secured by Design guidelines at the time of above grade works of each building or phase of said development.

**Informative:**

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.

**Section 3 - Conclusion:**

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.

Appendix 1: Concerns and Comments

In summary we have site specific comments in relation to the following items. This list is **not exhaustive** and acts as the initial observations based on the available plans from the local authority and architect. Site specific advice may change depending on further information provided or site limitations as the project develops:

**Boundary Treatment –**

The site appears to have appropriate boundary treatments to avoid excessive permeability, but this will need to be clarified to ensure that security and safety are paramount to reduce risk.

**Car Parking –**

- All car park areas should have consideration given to CCTV however all underground car parks will be required to have CCTV as outlined in the Safer Parking scheme.
- All underground car park areas will be required to meet the minimum standards set out in the Safer Parking scheme – Refer to the Secured by Design website for details.
- All underground car park areas will require access controlled gates to an LPS1175 SR2/STS 202 BR2 standard with ingress & egress via a key fob, proximity reader or combination of both and not make use of an induction loop to facilitate egress
- Motorcycle parking bays should be clearly defined and have two LPS1175 SR2 / STS503 ground anchors in place to secure the bike.
- Gates should be full height and the timing of the opening/staying open/closing is essential.
- Gates should be designed to remove the opportunity to climb if they are not full height.
- Access control from underground car parking into the core is to be through LPS1175 SR2 or STS202 Issue 3:2011 Burglary Rating 2 doors.

o The door sets should be self-closing and self-locking with an internal thumb turn – External entry should be restricted by key fob, key, key code or proximity reader and must not have the facility to call individual flats.

**Door/Window Specifications –**

- All easily accessible windows should be certificated to either PAS24:2016 P2A, STS204 Issue 3 2012, LPS1175 Issue 7:2010 Security Rating 1 or LPS 2081 Issue 1 Security Rating A.
- All glazing in and adjacent to communal, front, back doors and ground floor windows as well as windows that are easily accessible above ground floor level should incorporate one pane of laminated glass meeting the requirements of BS EN 356:2000 class P2A. (E.G. PAS24 P2A).
- Accessible windows includes any glass reached by climbing any number of floors via rain water pipes, balconies or via communal walkways (whether the walkway is accessed through a secure door or not).
- It also includes any area which has a hand hold within three meters of the ground. All easily accessible windows should have key operated locks. Where windows are required under Building Regulations to act as a fire escape route, the opening window must not have key operated locks.
- Windows that form an integral part of the doorframe should be shown to be part of the manufacturers certified range of door sets. Alternatively where windows are manufactured separately from the door frames, they should be certified to either PAS24:2016, STS204 Issue 3:2012 or LPS2081 Issue 1:2014. In such cases the window should be securely fixed to the door set in accordance with the manufacturer requirements.
- All ground floor and vulnerable windows must have a lockable window restrictor to prevent unauthorized access – however consideration needs to be given if the windows are escape windows.
- **Where curtain walling is proposed at ground level the minimum standard that should be accepted is BS EN1627 RC3.**

**Security Compartmentation**

Based on the ground floor and upper floor layouts, blocks that are serviced by a single entrance lobby should include compartmentation to control free movement and reduce anti-social behaviour.

Access control is required on the main communal entrance door secondary communal entrance door (lobby), ground floor stair door and lift destination control is required if traditional compartmentation cannot be achieved on upper floors ( for both the resident and the visitor.)



If lift destination control is utilised then a trailing cable into the lift shaft is required to facilitate the lift and access control system working together.

**Balconies/Climbing Aids** – Balconies should be designed so that they have flush fitting glazed balconies or a flush fitting trim around the base of the balconies so as to not create a climbing aid. Any external drainpipes should be of square design and fitted flush to the wall to reduce the opportunity to climb. The design should not provide opportunities to climb. If such examples cannot be designed out and climbing may be possible then vulnerable properties must have PAS 24:2016 doors and glazing.

**Communal Entrance** - Site specific recommendations

- Communal door sets should be certified to LPS1175 SR2 or STS202 Issue 3:2011 Burglary Rating 2 before considering LPS2081 SRB.
- Communal door sets should be self-closing, self-locking and single leaf– External entry should be restricted by key fob, key, key code or proximity reader. Now supported in Homes 2019
- Communal door sets should have vandal resistant audio/visual access control panels with electronic lock release – **NO Trade Buttons are permitted.**

**CCTV** – It is advised that CCTV is installed covering the main entrance, the hallway/airlock/postboxes as minimum. This should be installed to BS EN 50132-7:2012+A1:2013 standard, co-ordinate with the planned lighting system, contained within vandal resistant housing, to record images of evidential quality (including at night time) that are stored for a minimum of 30 days on a locked and secure hard drive or a remote cloud system. Appropriate signage should also be included highlighting its use.

• **Postal strategy** – It would be advised that all post is delivered into an airlock (preferred) or through the wall to reduce the likelihood of tailgating and postal theft. Through the wall letter plates should incorporate a sloping chute and anti-fishing attributes to mitigate against mail theft and meet TS008 standard. If post is to be delivered into an airlock then these should be securely surface mounted and meet TS009 standard.

• **Bike Storage** – Site Specific Recommendations. We recommend that the external entrance doors should be to LPS 1175 SR2 or equivalent standard incorporating self-closing hinges, a thumb turn on the inside of the door, PIR lighting there should be 3 points of locking for the bikes and signage for residents advising to lock their bikes appropriately. The bike store should not be advertised from the outside to further deter opportunistic crime and access should only be provided to those who register with the Managing Agency.

	<ul style="list-style-type: none"> <li>• <b>Bin Storage</b> – site specific recommendations but generally the external entrance doors should be to LPS 1175 SR2 or equivalent standard incorporating self-closing hinges, a thumb turn on the inside of the door, PIR lighting and 358 close weld mesh reinforcement on the internal face of louvers, if they incorporate a slatted ventilation design. This should be data logged and fob controlled with 2 maglocks sited 1/3 from the top and bottom and able to withstand 1200lbs/500kg of pressure individually.</li> <li>• <b>Lighting</b> – A lux plan should be provided to encourage overall uniformity of lighting and reduce the likelihood of hiding places or dark spots. It is advised that this reaches a level of 40% uniformity and is compliant to BS 5489:2013. Dusk till dawn photoelectric cells with ambient white lighting is advised for best lighting practice. Bollard lighting as a primary light source is <b>not recommended</b> as it does not provide suitable illumination and creates an “up lighting effect” making it difficult to recognise facial features and thus increase the fear of crime.</li> </ul>	
<p>NHS Clinical Commissioning Group</p>	<p>Thank you for the opportunity to comment on the above planning application. This response from NHS North Central London CCG addresses the healthcare impact of the development proposal.</p> <p>The planning application proposes 72 new homes, a cinema and supporting commercial uses. The CCG has recently responded to the neighbouring Goods Yard and The Depot planning application (HGY/2021/1771). Both applications will have a significant impact on local healthcare infrastructure.</p> <p>The site lies within the High Road West area allocated as site NT5 in the Tottenham Area Action Plan (2017). The High Road West Masterplan Framework (2014) acknowledges that additional healthcare provision is needed in the area, particularly primary care services. The two closest GP practices - Tottenham Health Centre and Somerset Gardens Family Health Centre have no surplus capacity as measured by the ratio of FTE GPs per registered patients which is above the standard benchmark.</p> <p>The CCG 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</p>	<p>Noted, however Haringey's Planning Obligations SPD and Annual Infrastructure Funding Statement make clear that health contributions should be dealt with through Strategic CIL rather than S106 planning obligations. Therefore the need for additional primary health care provision should be addressed by considering the use of Strategic CIL to support a new facility to cater for the needs arising from the wider High Road West site rather than through S106 planning obligations.</p>

	<p>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.</p> <p>Using the proposed housing mix stated in the Planning Statement (Tables 4.1 and 7.1), the HUDU Planning Contributions Model calculates a primary healthcare s106 requirement of £35,845.</p>	
<p>Residents Associations - Cannon Road RA</p>	<p>Cannon Road residents group is broadly in favour of the Printworks development. We feel the addition of new homes and a potential cinema space would provide valuable resources to our residents and local community.</p> <p>Particularly regarding the existing La Royale space - we agree it should not be determined a community asset. Our residents are often impacted by noise from commercial events in this space, as sound proofing is not adequate on the north side of the building. When Goods yard and Depot buildings are occupied we would expect these residents to be impacted more than we are if the use of the site does not change. Given the changing nature of this HRW area, moving from industrial and commercial units to residential usage, we see the Printworks site, and removal of La Royale, playing a positive role in a successful transition and ensuring hundreds of homes are at least a little more peaceful and enjoyable.</p> <p>Given recent unprecedented flooding in London over the summer of 2021 we would like to query the statements about being a relatively low flood risk development - especially given the intention to carve out a basement space. Will basement spaces be designed in a way that superficial/decorative repairs won't be required if flooding occurs. As a small development, keeping an eye on possible expensive service charge items should be a strong consideration. We would also expect the council to sense check whether changes made to the roof type might cost future residents more in the long term - if it comes with higher risk of leaks, for example?</p> <p>Alongside, it wasn't quite clear whether any parking (even disabled spaces) is being made available for the cinema space.</p>	<p>Support for the development is noted.</p> <p>On flood risk – appropriate conditions are recommended.</p>

<p>Tottenham CAAC</p>	<p>The Tottenham CAAC has serious reservations over the demolition of, yet again, another building that constitutes a part of Tottenham's historic High Street frontage and the continued erosion of the historic fabric that is an invaluable and recognised heritage asset.</p> <p>The modest no. 829 along with the narrow Brunswick Square alley provide much of characteristic rhythm all along Tottenham's High Road. This is recognised in Haringey Council's relatively recent North Tottenham Conservation Area Appraisal and Management Plan as well as in the applicant's own DAS statement.</p> <p>We have read the arguments made by the applicant to justify the demolition of no. 829 but we also have noted:</p> <ul style="list-style-type: none"> <li>- the reservations expressed by the officers during several pre-planning meetings between the LPA and the applicants' agents,</li> <li>- that apart from references to some input in pre-planning meetings, we also note the absence of any express comment from Haringey Council's Conservation officers.</li> </ul> <p>We would point out that the fact that no. 829 is the "least interesting" building of the historic set does not take away that it has important value, both given its history, and as being part of a whole.</p> <p>We emphasise that the building is locally listed and refer to several sections of the North Tottenham Conservation Area Appraisal and Management Plan that fully support this important aspect of the nature of the Conservation area , notably:</p> <p>in Character Sub-area A Tottenham High Road North</p> <p>1.5.4 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>After the passageway, No. 829, dating from the early-19th century, was a public house in the 1880s, and No. 827, rebuilt c1900, has a projecting gable that also adds a good punctuation in the roofline; both have well-preserved shop surrounds of c1900.</p> <p>in Townscape summary</p> <p>1.5.14 This character sub-area is the best-preserved and architecturally most diverse part of the conservation area, containing a sequence of buildings reflecting changing patterns of development from the early/mid 18th century through the 19th to the 20th century. the</p>	<p>Noted. the proposed development would result in both heritage harm and benefits, which affect the Listed buildings at Nos. 819-821, the North Tottenham Conservation Area, and the locally listed buildings at Nos. 823-829. This results in a complex interaction of harm and benefits.</p> <p>Having carefully considered issues, officers consider that the public benefits of the proposals outweigh the less than substantial harm that would be caused by the loss of the non-designated No. 829 High Road.</p>
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buildings, whilst of varying ages, contribute to a cohesive and contained streetscape that has a definite 'sense of place' in spite of the effects of the wide carriageway and density of road traffic. This is in part due to the general conformity in scale, height and materials (mostly brick) and the variation in silhouette or roofline.

1.5.15 The variation in the building line helps to create a fluid, inter-penetrating and complex sequence of linked spaces and sub-spaces.

1.5.16 There are few outstanding buildings on the west side of the central section, but with its slight concave curve to the continuous street frontage and the rhythm of narrow frontage widths and its varied roofline, this frontage is reminiscent of a 19th century country town high street.

TCAAC further points out to the local Planning Authority and the Planning Committee, key principles listed in the NTCAA & Management Plan. These are material considerations in making any decision.

Section 2.4 Managing Change in the Conservation Area:

- All new development in the conservation area should preserve or enhance its special interest, in terms of scale, design and materials and should have regard to the design guidance provided in part 3 - preserving and enhancing the Conservation area.
- The Council will endeavour to ensure that its departments work corporately to ensure that development decisions preserve or enhance the conservation area.

The applicant's Heritage Statement makes a good effort to reduce any significance of the building to a minimum and build a case for demolition but we would remind the local planning authority of Note 3 of Historic England's Good Practice guidance and especially step 4 which requires the exploration of ways to maximise enhancement and avoid or minimise harm. It is the applicants themselves that have referenced this guidance.

We would also point out that the perspective looking west via a widened Brunswick Square, as featured on page 243 of the DAS, shows just how negative the effect of widening this alley into a major access street would be, given the bulk and massing of the structures behind it. The planners and committee must take into consideration how this affects the views and perspectives from the pavements in the context of the important value of townscape elements (scale, continuity, height) we have referenced above.

We note that the HRW master plan makes provision to provide suitable vehicular and service access to this site from other locations and repeat that we feel that the narrow alleys are actually a defining constituent element of the character of the High Road at this location.

	<p>We feel it is an error to have the principal vehicular and service access to a development of this size leading on/off of the High Road as this creates a full street intersection with the High Road traffic where one did not exist before. This is especially relevant at a time when the place of private vehicles within our public spaces is under consideration.</p> <p>We reference developments, among so many other in London and elsewhere, at:</p> <ul style="list-style-type: none"> <li>- Islington Place as it relates to the alley like entrance from Upper Street in N1 (Post office redevelopment),</li> <li>- Slingsby Place, St Martin's Courtyard - and the historic alleyways around Covent Garden in general, and</li> <li>- several alleyways leading west off of Tottenham Court road.</li> </ul> <p>These are all examples of an alternative way in which a successful redevelopment can be undertaken in a very valuable historic context without demolition of no.829. and the feature alleyway.</p> <p>We further reference the North Tottenham CAA&amp;MP when it states: Condition and Development Pressure</p> <ul style="list-style-type: none"> <li>- much of the degradation is due to incremental alterations and poor standards of maintenance. And again to section 3.7.1 there is a presumption in favour of the retention of all buildings on the statutory list, locally listed buildings and buildings that make a positive contribution to the conservation area, in line with national and local policy.</li> </ul> <p>As such TCAAC feels that adequate efforts have not been made to seek to retain the building, and that the negative effects - the demolition of a locally listed building, the removal of a historic feature alleyway, the continued erosion of the special character of the Conservation Area, especially in this particular stretch, do not out way the benefits.</p> <p>Demolition is permanent. The new buildings are being conceived and an alternative/workaround can and should be found. Therefore, while the TCAAC does support the wider objectives and spirit of the proposed, above-referenced version of the scheme, we cannot support it specifically as it relates to the demolition of no. 829 High Road and the widening of the adjacent alley. On this basis we object to this application.</p>	
Transport for London	<p>Thank you for consulting with TfL. Regarding the above application, we have the following comments</p> <ol style="list-style-type: none"> <li>1) The site of the proposed development is on High Road, which forms part of the Strategic Road Network (SRN). TfL has a duty under the Traffic Management Act</li> </ol>	Support for car free and the proposed level of cycle parking noted.

	<p>2004 to ensure that any development does not have an adverse impact on the SRN.</p> <ul style="list-style-type: none"> <li>- The footway and carriageway on High Road should not be blocked during the demolition and construction period. Temporary obstructions during the conversion should be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians or obstruct the flow of traffic on High Road. All vehicles should only park/ stop at permitted locations and within the time periods permitted by existing on-street restrictions.</li> </ul> <p>We request that the applicant manages their construction away from the SRN</p> <p>2) We welcome that the development is proposed as car free in line with London Plan Policy T6.B and welcome the disabled parking spaces provided in line with London Plan Policy T6.1.G. We also appreciate the number of cycle parking spaces proposed, in line with London Plan Policy T5, table 10.2</p> <ul style="list-style-type: none"> <li>- We request a scale drawing of the proposed cycle parking alongside the application. This should be in line with Chapter 8 of the London Cycling Design Standards (LCDS), in line with London Plan Policy T5.B. Please see here for guidance: <a href="http://content.tfl.gov.uk/lclds-chapter8-cycleparking.pdf">http://content.tfl.gov.uk/lclds-chapter8-cycleparking.pdf</a></li> <li>- We would welcome further detail in relation to how on site routes will connect to the wider cycle network in the area to the Cycle Superhighway 1 which finishes south of the site - Regarding potential cycle links, networks and access, it is key that the developers are in contact with the other developers for the surrounding sites in the High Street Western Masterplan. To make sure there is co-ordination and communication between them regarding their cycle plans, to help connectivity and the local cycling network as a whole.</li> <li>- Access routes to the site on foot should provide footways on both sides.</li> <li>- Delivery and servicing is proposed on on-street loading bays. TfL has concerns in relation to turning/reversing vehicles on Brunswick Square. Potential conflict with pedestrians and cyclists entering and leaving the long stay cycle parking provision should be mitigated. A Stage 1 RSA should be completed.</li> <li>- There are several concerning conflicts regarding the proposed cycle parking in the site. The access to the car park and the south of the site is next to the short-stay cycle parking locations, which could create danger regarding cyclists entering and leaving.</li> </ul>	<p>Combined Stage 1/2 Road Safety Audit required by recommended conditions.</p> <p>For the purposes of this application, based on 10 additional bus trips in the AM peak, officers do not consider that obligations towards additional bus services would meet the test for planning obligations set out in the NPPF and legislation. This approach was accepted on the extant permission for 867- 879 High Road which would have a greater impact on bus usage.</p> <p>A Construction Logistics Plan is required by way of condition which would safeguard safety during construction.</p>
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	<p>- This conflict could also occur at the long-stay parking at the north of the site, as it is in close proximity to the proposed loading bay.</p> <p>3) High Road is also a busy bus route, which serves the services, 279, 349, N279, 259 and the 149. There is also 2 White Hart Lane bus stops, located on High Road and White Hart Lane at the south of the site.</p> <p>- The trips associated with the Printworks development itself would not necessitate bus network capacity enhancements in isolation.</p> <p>- Confirmation of the accumulative impact of committed developments, as set out in tables 38 and 39, is welcomed. However, a mechanism is still needed to provide accumulative bus trip generation figures for the HRWM (with trips distributed by bus route and direction) so that the impact on the bus network capacity can be assessed. Further detail is required to clarify the wider picture of the surrounding bus network and capacity.</p> <p>- It is possible that contributions would be required to accommodate trips for the masterplan – in which case the Printworks site would be accountable for a percentage of that cost.</p> <p>- We require that the period of demolition and construction of the development will have no negative impact on bus operations, in terms of journey times, reliability or the manner in which bus stops are served. Construction plans should be shared and agreed with Service Delivery</p> <p>4) Regarding the site specifically, it does not appear to have a significant impact at White Hart Lane Station.</p> <p>- However, as the site sits within the HRWM, and any development impact to the London Overground (LO) should be considered cumulatively with any other sites seeking planning permission in the area. This should be considered assuming the proposed trip generation methodology</p> <p>- Cumulative rail impacts from the development in the wider area will be significant and the additional proposed sites are likely to put further strain on the station and services at White Hart Lane.</p> <p>5) Due to the site's proximity to the Tottenham Hotspur Stadium, the applicant needs to be aware of the impact that events at the stadium can have on construction</p>	
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	<p>arrangements and ease of access to the site. Construction arrangements should be aligned with major stadium events</p> <p>6) We would like to know details on the larger accumulative impact that this site will have on all the transport modes. As the development should be looked at and analysed in a wider site context, looking at the impact it has alongside the other developments and proposed developments within the High Road Western Masterplan. As the accumulative data needs to be analysed to check for potential pressure on surrounding transport services.</p> <p>7) We would like clarification regarding the residential trip generation, particularly for the AM peak and the low modal share assumed for rail.</p> <p>8) We request that no vehicles associated with the construction, demolition and refuse process should reverse at any time on the site. This is in line with the Mayor's Vision Zero initiative, which is also in line with London Plan Policy T4.F</p> <p>9) Due to the potential of conflict in a number of access roads, and the predicted larger pedestrian and cycle use from the development, we request a Road Safety Audit (RSA) to be completed by the applicant.</p> <p>10) We appreciate that within the Construction Logistics Plan, the applicant considered methods of sustainable freight. However, to add to this point, we would like the applicant to consider the use of cargo bikes as a method of freight for this development. This is to support London Plan Policy T1 which sets out that 'development plans should support and development proposals should facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041'.</p>	
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