

Appendix 3 – Consultation Responses from Internal and External Agencies

Stakeholder (LBH)	Comments	Response
Design Officer	<p><u>Context</u></p> <ol style="list-style-type: none"> 1. The proposals are for replacement of an industrial unit behind a petrol station with residential. The petrol station fronts Lordship Lane, one of the main east-west link roads in the borough, which connects Wood Green with Tottenham. The site is closer to the Wood Green end of Lordship Lane, an approximately 10 minute walk away, whilst there are several small local shops in short parades on Lordship Lane short distances to the east and west of the site. Opposite the petrol station is Chapmans Green, a modest sized local public park, whilst the other three sides of the site are in residential use. 2. Neighbouring the site to its east is a block from the Lordship Lane Estate, an early 20th century council estate of four, 2-3 storey blocks lining the south side of Lordship Lane, in a striking Arts and Crafts style, of good enough quality to be designated a Conservation Area of the same name. They consist of ground floor flats with their own front doors, with maisonettes over on the 1st floor and into their steeply pitched roofs; each flat having a private back garden, some of which back onto the eastern boundary of the site. The southern boundary, which is also the line of the culverted River Moselle, backs onto the Noel Park Estate, a pioneering late 19th century philanthropic dwellings company estate of terraced two and three storey cottages, also of a consistent high quality design and also a conservation area of its same name. 3. The western boundary is to Coldham Court, a post-war council estate of three and four storey blocks, the nearest two of which are both parallel to Lordship Lane, with communal landscaping to the main street frontage and between the two, and a parking court south of the southern block. This is accessed through a gap in Moselle 	Comments have been taken into account. Materials and design detailing would be controlled by condition.

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	<p data-bbox="533 272 1742 379">Avenue, the Noel Park Estate street south of this site, and provides access to residents' garages on the ground floor of this block. The site and location is therefore well suited to residential development.</p> <p data-bbox="465 419 974 451"><u>Street / Block Layout and Access</u></p> <p data-bbox="483 496 1727 935">4. In this application scheme, the proposal is a single new residential block parallel to the frontage to Lordship Lane to the north and back of the houses on Moselle Road to the south, pulling back from the boundary to the back gardens of the Lordship Lane Estate to the east, but starting from close to the boundary of Coldham Court, where there is a blank flank wall to its southern block, to which it would act as a continuation. The proposed residential building would, sensibly, turn its back on the petrol station, to protect residents from noise and pollution. This entails accessing the new block from Moselle Avenue, via Coldham Court's car park, for which the applicants have entered into an agreement with the council's Housing Department. This layout and access will be beneficial to Coldham Court and wider community integration, enlivening and bringing passive surveillance to the currently car dominated car park access point to Coldham Court</p> <p data-bbox="483 975 1727 1375">5. The application site layout leaves private gardens for ground floor flats to the west side, where the set-back avoids overshadowing of neighbouring private gardens and protects a large tree. To the south, up to the culvert of the Moselle and the back gardens of Moselle Avenue is proposed as a private communal garden and childrens playspace; it will be open to and passively surveilled from the entrance to existing Coldham Court and this new development, promoting integration of the development with neighbours and allowing potential for future deculverting of The Moselle. Back gardens of properties along Moselle Avenue will be protected by their existing high brick garden walls and site landscaping but will gain an open planted neighbour in place of a two storey industrial unit. The main front door to the development is located to be visible from the approach into Coldham Court from Moselle Avenue,</p>	

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	<p>providing an excellent clear route and passive surveillance of the whole parking court, communal garden and entrance area.</p> <p><u>Principal of Development and Masterplanning</u></p> <p>6. The loss of employment on the site is positive from a design point of view, as it will be a more compatible neighbour to the predominantly residential neighbours. It is not likely that more modern employment uses would be attracted to this site if they had to enter the site across the petrol station forecourt or from Coldham Court, deep in the “residential hinterland”. This is notwithstanding that, whilst the petrol station itself may be a viable business at the moment, given that petrol driven cars will be withdrawn from sale within the next 10 years, it is likely that it will need to change use, and probably be redeveloped itself, within the next 10-20 years. If it was redeveloped now, the urban design recommendation for the site would be commercial or community use on the ground floor, generating employment and active frontage onto Lordship Lane, with three or four floors of residential above.</p> <p>7. These proposals therefore accommodate both continued use of the petrol station, albeit that that is likely to be only in the short to medium term, and likely redevelopment as described above. The proposals have only a single access door and a few small secondary upper floor windows onto the petrol station, so that an L- or T-shaped block plan on the petrol station site could be built up to the boundary of this building, possibly with complete ground floor coverage for non-residential uses. The access door maintains the landowners’ right of way, and would be used for refuse collection for this development, but not for residents’ or visitors’ access.</p> <p><u>Architectural Expression, Fenestration & Materiality</u></p> <p>8. The proposals are for a four storey building, with a distinct ground floor “Base”, two storey “Middle” and set back “Top”; the latter in lightweight grey metal cladding of a more roof-like appearance contrasting with the predominantly red bricks to the base</p>	

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	<p>and middle, with a darker red used for the Base and for details around windows. This, and in particular these brick tones, picks up on and aims to match materials used in the vicinity, particularly in the Noel Park Estate. The height up to the set-back top floor matches those of Coldham Court, and is one floor higher than those of Moselle Avenue, a reasonable step up for a development that will have a reasonable separation from it. There are buildings of three, four and five storeys along Lordship Lane in the close vicinity.</p> <p>9. Fenestration is orderly and proportioned with vertical emphasis to match the context, particularly of the Noel Park Estate. Despite being a modestly sized development, views of the proposals are carefully considered, especially from the south-east and south west, through the entrance to Coldham Court from Moselle Avenue and through the gap between the end of Moselle Avenue and the neighbouring Lordship Lane estate block (across back gardens), in recognition of their Conservation Area status, and the proposal is considered to harmonise in height, proportions and materials with neighbouring buildings of both Conservation Areas.</p> <p>10. From the north, the proposal makes a purposeful back onto the petrol station forecourt. As discussed elsewhere, it is reasonable to assume there is a high likelihood that this site will be redeveloped some time in the medium term future, when this will be hidden by adjoining buildings, that could be built right up to this without any detrimental impact. In the interim and/or absence, the petrol station will not form an attractive sight, but the proposals will not be <i>just</i> a blank wall onto it; divided into three distinct vertical elements, in two contrasting bricks, with the stair core picked out in the darker brick of the base, along with hit-and-miss patterned brick, offering glimpses of form, light and movement behind, as well as a couple of small kitchen and bathroom windows, it will form a harmless and sufficiently interesting backdrop to improve even this ugly space.</p> <p><u>Residential Quality (flat, room & private amenity space shape, size, quality and aspect)</u></p>	

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	<p>11. With four flats on the ground floor, five on the first and second and three on the third floor, the proposed new homes are considered to provide an excellent standard of residential accommodation. All flats have at least dual aspect, albeit that some south facing one bedroom flats rely for their second aspect on windows facing west or south from projections beside balconies. In the case of those on the south side, facing west, these are also their primary outlook onto their balconies, which themselves are primarily oriented west, with screening to their routh to reduce overlooking to the rear elevations and back gardens of the existing neighbouring houses on Moselle Avenue, notwithstanding that the nearest habitable room windows of those house are 18m or more away from windows in the proposal, 18m being the maximum distance at which the human face can be recognised.</p> <p>12. All flats have generous balconies, roof terraces or private ground floor gardens. In addition, as mentioned above, all flats will benefit from access to a shared communal soft landscaped external amenity space, including within playable landscaped features and play equipment for younger children, meeting the definition of doorstep play. As is to be routinely expected, all flat, relevant room and storage sizes, area and height, meet or exceed statutory minima in the Nationally Described Space Standards, and indeed generally go beyond, to meet the standards set in the Council's Housing Team Design Standards.</p> <p><u>Daylight and Sunlight</u></p> <p>13. 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>14. All habitable rooms exceed the minimum recommended in The BRE Guide for daylight. Three of the 14 living rooms in the proposed development fall short of the recommended levels for sunlight. These three are each one bedroom flats in the north-east corner of the proposed development, on the ground, first and second floors. These flats' main outlook is east-north-east (about 10° north of due east), with a secondary window and door facing south-south-east into their deeply recessed balcony. The BRE Guide only counts windows facing within 90° of due south, meaning only the windows onto recessed balconies in these cases, whilst the rooms will receive good early sunlight, as well as having generously sized, at least partially sunlit, external amenity space.</p> <p>15. The applicants day and sunlight consultants have also assessed the effect of their development on other existing neighbours that could conceivably be affected by this development, namely Coldham Court, Moselle Avenue and 557-571 Lordship Lane. This found NO noticeable adverse effects on daylight or sunlight for any neighbouring dwellings, a very good result that really strongly demonstrates the suitability of the development form, bulk and height to the site context.</p> <p>16. 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, albeit that it is pretty much achieved in this exemplary proposal.</p>	

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	<p><u>Summary</u></p> <p>These proposals are well designed and appropriate to the site. They are of a form, bulk and mass appropriate to the location and context, fitting like a glove, with <i>no</i> adverse impacts on neighbours. In proportions, fenestration and materials that are compatible with the two neighbouring conservation areas, it will have an attractive appearance from within the conservation areas and neighbouring residential streets and estates, and an acceptably enlivened temporary backdrop to the petrol station. It will provide good quality homes within well landscaped spaces and providing improvements to the currently poor quality approach to Coldham Court from Moselle Avenue.</p>	
<p>Conservation Officer</p>	<p>The application site is located adjacent to two conservation areas, Noel Park Conservation Area to the south, and Lordship Lane Conservation Area to the east. The proposals are for replacement of an industrial unit, comprising one and two storey buildings, with a residential development of four storeys.</p> <p>The proposed development has been discussed extensively with Officers during pre-application meetings. The principle of the proposed development is acceptable. The proposed height, mass and scale take into consideration the prevailing urban scale and have been tested in views from the conservation areas towards the site.</p> <p>The design, built form and materiality of the proposed development have been informed by the character and appearance of the surrounding conservation areas.</p> <p>Overall, it is considered that the proposed development would preserve the character and appearance of the conservation areas and there would be no adverse impact on their significance. Therefore, there is no objection from a conservation perspective.</p>	<p>Comments have been taken into account in the assessment of this application.</p>

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Transportation Officer	<p>Transport Statement</p> <p><u>Existing Trip Generation</u></p> <p>The existing trip generation is focussed on vehicles and does not examine other modes of travel. Based on Census journey-to-work modal share data (table WP7103EW), a multi-modal trip generation could have been established by deriving all non-vehicle modes from the volume of vehicle trips calculated from TRICS. Nevertheless, by underestimating the volume of existing trips, the assessment is robust in terms of net trips.</p> <p><u>Development Proposals</u></p> <p>The development proposals are for the demolition of the existing 830sqm light-industrial building and the construction of a residential block comprising 17 flats, of which 10No. 1-bed, 2-person units, 5No. 2-bed, 3-person units and 2No. 3-bed, 4-person units. A total of 2 units are proposed to be wheelchair-accessible.</p> <p><u>Proposed Pedestrian and Cycle Access</u></p> <p>Pedestrian and cycle access would be gained via Coldham Court, off Moselle Avenue. Secondary access would be granted on the north side of the proposed building, via the petrol filling station.</p> <p><u>Proposed Vehicular Access</u></p> <p>All vehicular access would be via Coldham Court. The swept paths provided show that vehicles could manoeuvre satisfactorily into, within and out of the site.</p> <p><u>Proposed Car Parking</u></p>	<p>Comments have been taken into account. The recommended conditions and obligations will be secured.</p>

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	<p>The proposed development would be car-free, with the exception of 2 wheelchair-accessible parking spaces located in the site's southwest corner and accessed via Coldham Court. Both spaces would benefit from electric vehicle charging points.</p> <p>The site is located in the Wood Green Outer Controlled Parking Zone (CPZ) operating Monday-Saturday 08:00-18:30. The site's Public Transport Accessibility Level is 5. In line with Policy DM32: Parking of the Development Management DPD, the proposed development would indeed qualify for a car-free status. The Council would not issue any residents of the proposed development with on-street resident parking permits due to its car-free nature. The Council would use legal agreements to require the landowners to advise all occupiers of the car-free status of the proposed development.</p> <p>It is noted that the parking spaces serving the Coldham Court development adjacent to the site are private and the future residents of the proposed development would not have access to those spaces. A planning condition may be sought to prevent the future residents from parking there.</p> <p><u>Parking Stress Survey</u></p> <p>The parking stress survey undertaken as per the Lambeth methodology within 200m of the site has shown that all surveyed streets are largely below the 85% occupancy threshold, with the busiest street being Gladstone Avenue (75% occupancy). The parking stress levels have been assessed based on the typical 5m bay length advocated by the methodology; from experience, driver parking habits in the borough mean that sometimes the bay length required to park a vehicle is closer to 6m. However, it is expected that, even with a 6 bay length, there would remain significant spare capacity in the locality.</p> <p>Therefore, whilst the proposed development would be made car-free, it could still give rise to additional parking demand (through visitor parking permits) which could be easily accommodated in the site's vicinity due to sufficient residual on-street parking capacity.</p>	

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	<p><u>Proposed Cycle Parking</u></p> <p>The proposed development would provide 30 long-stay and 2 short-stay cycle parking spaces, which is in line with the minimum London Plan (2021) cycle parking standards.</p> <p>Additionally, 5% of the 30 long-stay spaces (equating to 1.5 spaces, rounded to 2 spaces) should be provided for larger cycles in the form of a double-sided Sheffield stand. We would also expect to see 20% of the 30 spaces to be in the form of Sheffield stands. Hybrid solutions with Sheffield stands in the lower part and racks in the upper part should be explored at this stage.</p> <p>Once an indicative layout has been agreed, we would seek to secure the adequacy of the cycle parking and access arrangements by planning condition. This would involve the provision of full details showing the parking systems to be used, access to them, the layout and space around the cycle parking spaces with all dimensions marked up on a plan.</p> <p><u>Proposed Trip Generation</u></p> <p>The proposed trip generation methodology is accepted. The delivery and servicing trips used in the Transport Statement are based on LGV trip rates. The TRICS output appended to the document shows that the dedicated 'Servicing Vehicles' trip rates should have been used instead, but it is acknowledged that the difference between the two methodologies would have been small considering the scale of the proposed development and the resultant number of trips.</p> <p><u>Net Change in Trips and Transport Impact</u></p>	

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	<p>The net trip generation shows a decrease in the number of vehicle trips, and an increase in the number of walking, cycling and public transport trips. A more accurate calculation would have obtained if the existing trip generation had been more refined to take account of non-vehicle modes. However, the assessment is robust as it underestimates the number of existing trips, thus overestimating the net trip estimates.</p> <p>The impact of the proposed development upon the local transport networks would not be significant.</p> <p>Construction Management and Logistics Plan</p> <p>A Construction Management and Logistics Plan (CMLP) would be secured by planning condition. The purpose of the CMLP is to help the developer minimise the construction impacts related to both on-site activity and the transport arrangements for vehicles servicing the site, whilst setting out the detailed procedures, sequencing and methodology to be followed by the project team.</p> <p>The document covers a number of management considerations, including community liaison, transport (traffic routes, traffic volume, access and egress, delivery times, loading and unloading, highway interventions etc.) and environmental (noise, vibration, dust, air quality, emissions, contamination, waste and material, ecology etc.) impacts and mitigation measures.</p> <p>The CMLP outlines the methodology for each phase of the planned demolition and construction works, as well as the anticipated timescales. It must give consideration to any cumulative impacts arising from local construction activity. It is intended to be a live document whereby different stages will be completed and submitted for application as the development progresses.</p>	

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	<p>The CMLP must follow the best practice guidelines as set out in the Construction Logistics and Community Safety (CLOCS) standard requirements and CLOCS and Transport for London's Construction Logistics Planning (CLP) Guidance (2021).</p> <p>Framework Travel Plan</p> <p>It's unclear why it has been provided as the number of units means the scheme is under the TfL threshold for a Travel Plan Statement, and the proposed development is not mixed-use. However, we welcome the provision of a Travel Plan Statement.</p> <p>I have no specific comments on the Framework Travel Plan, which is overall acceptable. Some observations to note:</p> <ul style="list-style-type: none"> - It is not certain that the Travel Plan Co-ordinator will be internal to the Council or Homes for Haringey, depending on the final ownership/management arrangements in place upon first occupation. This should be kept under review for future iterations of the Travel Plan Statement. We may decide to secure these by means of planning conditions or the Section 106 agreement. - Monitoring would not be limited to travel surveys and mode share targets. The use of the cycle parking facilities would also have to be closely monitored. <p>We would not object to the planning application being granted permission on transport grounds, subject to planning conditions and obligations:</p> <p>Planning Conditions</p> <p>1) <u>Cycle Parking Details</u></p>	

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	<p>No development shall take place until scaled drawings with details of the location and dimensions of secure cycle parking facilities have been submitted to and approved in writing by the Local Planning Authority. The proposed development shall not be occupied until a minimum of 30 long-stay and 2 short-stay cycle parking spaces for the residents and visitors of the proposed development have been installed in accordance with the approved details and the London Cycling Design Standards. Such spaces shall be retained thereafter for this use only.</p> <p><u>Reason:</u> To promote travel by sustainable modes of transport and to comply with the London Plan (2021) minimum cycle parking standards and the London Cycling Design Standards.</p> <p>2) <u>Construction Management and Logistics Plan</u></p> <p>Prior to the commencement of development, a Detailed Construction Logistics Plan shall be submitted to and approved in writing by the Local Planning Authority. The document shall follow the best practice guidelines as set out in the Construction Logistics and Community Safety (CLOCS) standard requirements and CLOCS and Transport for London's Construction Logistics Planning (CLP) Guidance (2021).</p> <p>The document shall include the following matters and the development shall be undertaken in accordance with the details as approved:</p> <ul style="list-style-type: none"> a) The routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway; b) The estimated peak number and type of vehicles per day and week; c) Estimates for the number and type of parking suspensions that will be required; and d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. 	

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	<p><u>Reason:</u> To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development, encouraging modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect of the amenity of neighbour properties and to maintain traffic safety.</p> <p>3) <u>Car Parking Management</u></p> <p>Prior to occupation, any prospective occupiers of the new units will be made aware through their tenancy agreements or conveyancing contracts for purchase of the reserved access to the adjacent Coldham Court car park, which may only be used by the occupiers of Coldham Court.</p> <p><u>Reason:</u> To ensure access to the car parking facilities adjacent to the site remains for the sole use of the Coldham Court residents and is kept unobstructed by any vehicles of the site residents.</p> <p>4) <u>Interim Travel Plan Statement</u></p> <p>The owner shall no later than three months prior to occupation submit to the Council for approval an Interim Travel Plan Statement for the future residents and visitors of the development, based on the principles set out in the Framework Travel Plan. Without the prior agreement of the Council, the owner shall not allow the development to be occupied until the Interim Travel Plan Statement has been approved by the Council.</p> <p>Following approval of the Interim Travel Plan Statement, the owner and all residents of the development shall comply with the approved Interim Travel Plan Statement.</p>	

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	<p><u>Reason:</u> To ensure the Travel Plan Statement is appropriately implemented, reviewed and monitored, to maximise its benefits for the users of the development and minimise any adverse impacts of the development upon the local transport networks.</p> <p>5) <u>Full Travel Plan Statement</u></p> <p>Following approval of the Interim Travel Plan Statement, unless otherwise agreed with the Council, the owner shall submit to the Council a Full Travel Plan Statement for the residents and visitors of the development (including a baseline resident travel survey and updates to the mode share targets) no later than six months after first occupation or as soon as 75% of the dwellings become occupied, whichever is sooner.</p> <p>Following approval of the Full Travel Plan Statement, the owner and all residents of the development shall comply with the approved Full Travel Plan Statement.</p> <p>The owner shall undertake a review of the Full Travel Plan Statement annually to be submitted to the Council no later than the anniversary of the approval of the Full Travel Plan Statement or on a reasonable alternative date requested or approved by the Council and notified to the owner.</p> <p>The owner shall have regard to any reasonable recommendations made by the Council upon the operation of the Travel Plan Statement following each annual review and discussion of the same with the Council.</p> <p>The review and monitoring of the implementation of the Travel Plan Statement will span over a period of five years starting from the submission of the Full Travel Plan Statement (including the baseline staff travel survey). A financial contribution of £3,000 will be required to be paid in full to this effect.</p>	

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	<p><u>Reason:</u> To ensure the Travel Plan Statement is appropriately implemented, reviewed and monitored, to maximise its benefits for the users of the development and minimise any adverse impacts of the development upon the local transport networks.</p> <p>Section 106 Planning Obligations or Unilateral Undertaking</p> <p>1) <u>Car-Capped Development</u></p> <p>The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as “car-free” and therefore no residents therein will be entitled to apply for a resident’s parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4,000 (four thousand pounds) towards the amendment of the TMO for this purpose.</p> <p><u>Reason:</u> To ensure that the development proposal is car-free and any residual car parking demand generated by the development will not impact on existing residential amenity.</p> <p>2) <u>Car Club Membership</u></p> <p>The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, which includes the provision of:</p> <ul style="list-style-type: none"> • two years’ free membership for all residents and £50 (fifty pounds in credit) per year for the first 2 years; and • an enhanced car club membership for the family-sized units (3-plus bed units) including 3 years’ free membership and £100 (one hundred pounds in credit) per year for the first 3 years. 	

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	<u>Reason:</u> To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.																									
Climate Change Officer	<p>Carbon Management Response 24/06/2022</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Response from the applicant to CM comments dated 23rd April 2022 • Energy & Sustainability Statement prepared by eb7 (5th April 2022), including: <ul style="list-style-type: none"> ◦ TM59 Overheating Analysis prepared by eb7 (dated October 2021) • Relevant supporting documents. <p>Energy</p> <p>The table below has been updated by the applicant, modelling a 73% reduction in regulated carbon emissions.</p> <table border="1"> <thead> <tr> <th>(SAP10 emission factors)</th><th>tCO₂</th><th>%</th></tr> </thead> <tbody> <tr> <td>Baseline emissions</td><td>16.91</td><td></td></tr> <tr> <td>Be Lean savings</td><td>1.77</td><td>10.47%</td></tr> <tr> <td>Be Clean savings</td><td>0</td><td>0%</td></tr> <tr> <td>Be Green savings</td><td>10.57</td><td>62.51%</td></tr> <tr> <td>Cumulative savings</td><td>12.34</td><td>72.97%</td></tr> <tr> <td>Carbon shortfall to offset (tCO₂)</td><td>4.57</td><td></td></tr> <tr> <td>Carbon offset contribution (incl. 10% management fee)</td><td colspan="2"> £95 x 30 years x 4.57 tCO₂/year = £13,024.50 + 10% (£1,613) = £17,744 </td></tr> </tbody> </table> <p>Energy - Be Lean</p>	(SAP10 emission factors)	tCO ₂	%	Baseline emissions	16.91		Be Lean savings	1.77	10.47%	Be Clean savings	0	0%	Be Green savings	10.57	62.51%	Cumulative savings	12.34	72.97%	Carbon shortfall to offset (tCO₂)	4.57		Carbon offset contribution (incl. 10% management fee)	£95 x 30 years x 4.57 tCO ₂ /year = £13,024.50 + 10% (£1,613) = £17,744		Comments have been taken into account. The recommended conditions and obligations will be secured.
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	<p>With SAP2012 carbon factors the Be Lean carbon reduction is also 10%, which is policy compliant. Although the response document stated that the Be Lean strategy had been updated, no changes were found.</p> <p>Energy - Be Clean The applicant confirmed verbally that an ambient loop (low-temperature system) is not being proposed, which is acceptable. A plantroom has been allocated on the basement floor plan. Further detail of infrastructure to be delivered as part of this development to enable a future DEN connection will need to be submitted at planning condition stage.</p> <p>Energy - Be Green The solar PV array has been increased to 36 panels, with a peak capacity of 11.88 kWp (equivalent to a reduction of 2.28 tCO₂/year). This is supported.</p> <p>Overheating The applicant has not modelled the development with the London Weather Centre file. This is not consistent with other developments in the borough and it will not account for the higher risk of heat within Haringey.</p> <p>The report states that the TM59 analysis assumes restricted window opening for safety at height and preventing the risk of entry at ground floor. However, no detail has been provided to demonstrate how that will comply with Building Regulations Part O and whether these windows can be assumed to be partly openable at night.</p> <p>The top floor communal corridor was modelled, passing the requirements. It has an assumed heat loss of 9.12 W/m from the 22mm communal heating pipework and the heat interface units (HIUs). A further assessment on the acceptability of this heat loss will be undertaken at detailed design stage.</p>	

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	<p>Sustainability – Biodiversity The design team did not add any further comments on the biodiversity benefits to be delivered on site. Biodiversity benefits should be maximised on site.</p> <p>Planning Obligations Heads of Terms</p> <ul style="list-style-type: none"> - Be Seen commitment to uploading energy data - Energy Plan and Sustainability Review - Estimated carbon offset contribution (and associated obligations), plus a 10% management fee (based on £2,850 per tonne of carbon emissions) – with a revised offset contribution calculated at Energy Plan and Sustainability Review stage, payment 50% due at commencement and remaining 50% post-occupation <p>Planning Conditions To be secured:</p> <p><u>Energy strategy</u> <i>The development hereby approved shall be constructed in accordance with the Energy & Sustainability Statement prepared by eb7 (5th April 2022) delivering a minimum 73% improvement on carbon emissions over Building Regulations Part L 2013, with SAP10 emission factors, high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 11.88 kWp solar photovoltaic (PV) array.</i></p> <p><i>(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:</i></p> <ul style="list-style-type: none"> - Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy; - Confirmation of the necessary fabric efficiencies to achieve a minimum 10% reduction in SAP2012 carbon factors, including details to reduce thermal bridging; - Location of equipment, specification, flow and return temperatures, and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of 	

Stakeholder (LBH)	Comments	Response
	<p><i>Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework, plant room layout and noise and visual mitigation measures;</i></p> <ul style="list-style-type: none"> - <i>Details of the PV, demonstrating the roof area has been maximised, with the following details: 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);</i> - <i>A metering strategy.</i> <p><i>The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.</i></p> <p><i>(b) Within six months of first occupation, evidence that the solar PV array and ASHPs installations have 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.</i></p> <p><i>(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.</i></p> <p><i>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.</i></p> <p><u>Future DEN Connection</u> <i>Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:</i></p>	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> • Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary to be delivered as part of this proposal, including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts; • A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation. <p><i>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.</i></p> <p><u>Overheating</u> <i>Prior to the commencement of development, an overheating model and report shall be submitted to and approved by the Local Planning Authority. The model will assess the overheating risk in line with CIBSE TM59 (using the London Weather Centre TM49 weather DSY1-3 files for the 2020s, and DSY1 for the 2050s and 2080s) and demonstrate how the overheating risks have been mitigated and removed through design solutions. These mitigation measures shall be operational prior to the first occupation of the development hereby approved and retained thereafter for the lifetime of the development. Air conditioning will not be supported unless exceptional justification is given.</i></p> <p><i>The report will include:</i></p> <ul style="list-style-type: none"> - Details of the design measures incorporated within the scheme following the Cooling Hierarchy to show compliance with mandatory DSY1 2020s weather file and more extreme weather files where feasible within the proposed construction, to 	

Stakeholder (LBH)	Comments	Response
	<p><i>ensure adaptation to higher temperatures is addressed, the spaces do not overheat, and the use of active cooling is avoided, including details of the feasibility of prioritising passive cooling and ventilation measures;</i></p> <ul style="list-style-type: none"> <i>- Details of the re-modelled pipework heat losses;</i> <i>- Details of security measures to the accessible habitable rooms relying on night-time ventilation demonstrating compliance with Building Regulations Part O;</i> <i>- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.</i> <i>- A retrofit plan to mitigate the future risks of overheating by setting out how the future mitigation measures are shown to help pass future weather files and confirming that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment) and include any replacement / repair cycles and the annual running costs for the occupiers;</i> <i>- Annotated floorplans showing which dwellings have been modelled.</i> <p><i>Reason: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><u>Living roof</u></p> <p><i>(a) Prior to the commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with 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></p> <ul style="list-style-type: none"> <i>i) A roof plan identifying where the living roofs will be located;</i> 	

Stakeholder (LBH)	Comments	Response
	<p> <i>ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm;</i> <i>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</i> <i>iii) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² 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-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays;</i> <i>iv) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with roof ball of plugs 25m³) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);</i> <i>v) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</i> <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 roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs 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.</i> </p>	

Stakeholder (LBH)	Comments	Response
	<p><i>In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i></p> <p><u>Biodiversity</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> <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 London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i></p>	
Housing Officer	The Housing Department supports this proposal for a 100% affordable scheme and has been pleased with the way the owner / developer has worked with the Councils Housing Team to develop this proposal.	Comments have been taken into account in the

Stakeholder (LBH)	Comments	Response
		assessment of this application.
Pollution	<p>Having considered all the relevant submitted supportive information i.e. Air Quality Assessment prepared by eb7 Ltd dated 17th November 2021 taken note of sections 5 (Baseline Air Quality), 6 (Potential Impacts), 7 (Air Quality Neutral Assessment), 8 (Mitigation) and 9 (Summary & Conclusions), Energy & Sustainability Statement prepared by eb7 Ltd dated 1st October 2021 taken note of section 8 (Conclusions) on the use of PV array roof top level & heat pump driven heating & DHW systems as well as the Phase I Site Appraisal with reference A19242/DTS/Rev O prepared by Patrick Parsons dated 30th April 2021 taken note of sections 2 (Phase I Desk Study), 3 (Phase I Conceptual Model), 4 (Recommendations), 5 (Further Work & Conclusions) of the need for site investigation, chemical analysis and gas monitoring, please be advise that we have no objection to the proposed development in relation to AQ and Land Contamination but the following planning conditions and informative are recommend should planning permission be granted.</p> <p>1. <u>Land Contamination</u> Before development commences other than for investigative work:</p> <ol style="list-style-type: none"> Using the information already submitted in Phase I Site Appraisal with reference A19242/DTS/Rev O prepared by Patrick Parsons dated 30th April 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. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which 	Comments have been taken into account. The recommended conditions will be secured.

Stakeholder (LBH)	Comments	Response
	<p>shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.</p> <ul style="list-style-type: none"> c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and; d. A report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. <p><u>Reason:</u> To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p><u>2. Unexpected Contamination</u></p> <p>If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <p><u>Reasons:</u> To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.</p> <p><u>3. NRMM</u></p> <ul style="list-style-type: none"> 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/. 	

Stakeholder (LBH)	Comments	Response
	<p>Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.</p> <p>b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ</p> <p>4. Demolition/Construction Environmental Management Plans</p> <p>a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst</p> <p>b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.</p> <p>The following applies to both Parts a and b above:</p> <p>a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).</p> <p>b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:</p> <p>i. A construction method statement which identifies the stages and details how works will be undertaken;</p>	

Stakeholder (LBH)	Comments	Response
	<p>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;</p> <p>iii. Details of plant and machinery to be used during demolition/construction works;</p> <p>iv. Details of an Unexploded Ordnance Survey;</p> <p>v. Details of the waste management strategy;</p> <p>vi. Details of community engagement arrangements;</p> <p>vii. Details of any acoustic hoarding;</p> <p>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</p> <p>ix. Details of external lighting; and,</p> <p>x. Details of any other standard environmental management and control measures to be implemented.</p> <p>c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:</p> <p>i. Dust Monitoring and joint working arrangements during the demolition and construction work;</p> <p>ii. Site access and car parking arrangements;</p> <p>iii. Delivery booking systems;</p> <p>iv. Agreed routes to/from the Plot;</p> <p>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</p> <p>vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and</p> <p>vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.</p> <p>d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:</p> <p>i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;</p>	

Stakeholder (LBH)	Comments	Response
	<p>ii. Details confirming the Plot has been registered at http://nrmm.london;</p> <p>iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;</p> <p>iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);</p> <p>v. A Dust Risk Assessment for the works; and</p> <p>vi. Lorry Parking, in joint arrangement where appropriate.</p> <p>The development shall be carried out in accordance with the approved details as well as on the applicant submitted proposed mitigation in the Air Quality Report in section 8 (Mitigation).</p> <p>Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.</p> <p><u>Reason:</u> To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.”</p> <p><u>Informative:</u></p> <ol style="list-style-type: none"> 1. Prior to the demolition of 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. 	

Stakeholder (LBH)	Comments	Response
Waste Management	<p>I have had an initial look at this one this morning and it appears that waste provision and collection have been well considered in the planning of this development.</p> <p>The bin store shows as having a footprint on 18.9m2. This is sufficient to accommodate the 3 x 1100l refuse bins, 2 x 1100l x mixed dry recycling bins and 1 x 140l food waste bin that will be needed to serve the 17 proposed units in operation. All waste streams/bins will be collected weekly. There will also be space for bulky waste which will need to be collected on request via booked collections.</p> <p>Coldham Court is already serviced by our flats/estates collection services. RCV access will therefore not be a problem here. The proposed bins store location is within 10m distance from where the RCV can safely pull up.</p>	<p>Comments have been taken into account. Collection methodologies will be secured by condition.</p>
Lead Local Flood Authority	<p>Having reviewed applicant's submitted Flood Risk Assessment and SuDS Strategy report dated 17th November 2021 prepared by EB7 Ltd, we have no observation to make on the above planning application. We are satisfied that sufficient information has been received and if the application site is to be built, manage and maintain as per the submitted FRA and SuDS strategy report, we are content that the impacts of surface water drainage will be addressed adequately.</p>	<p>Comments have been taken into account in the assessment of this application.</p>
Employment and Skills Officer	<p>The standard s106 wording would apply to this development.</p>	<p>Comments have been taken into account and the recommended obligations will be secured.</p>

Stakeholder (LBH)	Comments	Response
Tree Officer	<p>From an arboricultural point of view, I hold no initial objections to the proposal.</p> <p>The case has been supplied with an Arboricultural Tree Survey carried out by eight associates and dated 20/10/2021. The report has been carried out to British Standard 5837 Trees in relation to design, demolition and construction- Recommendations. I concur with the findings within the report, and the tree quality classifications. The report provides s tree constraint's plan but makes no recommendations or conclusions.</p> <p>No trees need to be felled, the existing foundations, and hardstand do not compromise the root protection areas of the trees on site that can be incorporated into the development.</p> <p>The following conditions should be applied:</p> <ul style="list-style-type: none"> • Landscape plans are finalised with species list • Aftercare programme in place to establish landscaping <p>We will also need confirmation if the adjacent Sycamore tree T9 will have enough clearance from the new structure, and the future roof garden or if any facilitating pruning is required?</p> <p><u>Additional Comments</u></p> <p>That answers and satisfies the query.</p>	Comments have been taken into account. Relevant conditions will be secured.

Stakeholder (External)	Comments	Response
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<p>Environment Agency</p>	<p>Based on a review of the submitted information, we have no objections to the proposed development. However we do ask that you please include the below informative for any permission granted due to the sites proximity to the Moselle Brook.</p> <p>Informative - Flood Risk Activity Permit The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:</p> <ul style="list-style-type: none"> <input type="checkbox"/> on or within 8 metres of a main river (16 metres if tidal) <input type="checkbox"/> on or within 8 metres of a flood defence structure or culvert (16 metres if tidal) <input type="checkbox"/> on or within 16 metres of a sea defence <input type="checkbox"/> involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert <input type="checkbox"/> in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission. <p>For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.</p> <p>Advice to LPA Water Resources Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell</p>	<p>Comments have been taken into account. The recommended informative will be secured.</p>
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	<p>their homes. For the homeowner lower water usage also reduces water and energy bills.</p> <p>We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.</p> <p>All new residential development are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within the Building Regulations &c. (Amendment) Regulations 2015.</p> <p>However, we recommend that in areas of serious water stress (as identified in our report Water stressed areas - final classification) a higher standard of a maximum of 110 litres per person per day is applied. This standard or higher may already be a requirement of the local planning authority.</p>	
Canal and River Trust	<p>This application falls outside the notified area for its application scale. We are therefore returning this application to you as there is no requirement for you to consult us in our capacity as a Statutory Consultee.</p>	<p>Comments have been taken into account in the assessment of this application.</p>
Thames Water	<p>Waste Comments</p> <p>Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. With regard to SURFACE WATER drainage, Thames Water would advise that if</p>	<p>Comments have been taken into account. The recommended informative will be secured.</p>

	<p>the developer follows the sequential approach to the disposal of surface water we would have no objection.</p> <p>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/Wastewater-services. 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-near-or-diverting-ourpipes.</p> <p>Water Comments</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.</p>	
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<p>London Fire Brigade</p>	<p>No comments received.</p>	<p>Comments have been taken into account in the assessment of this application.</p>
<p>Metropolitan Police Designing Out Crime Officer</p>	<p><u>Section 1 - Introduction:</u></p> <p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are 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 and agent to discuss Crime Prevention and Secured by Design at both feasibility and pre-application stage and have discussed our concerns around the design and layout of the development. The Architects have made mention in the Design and Access Statement referencing design out crime or crime prevention and have stated that they will be working in close collaboration with DOCOs to ensure that</p>	<p>Comments have been taken into account. The recommended conditions and informatives will be secured.</p>

	<p>the development is designed to reduce crime at detailed design stage. At this point it can be difficult to design out fully any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.</p> <p>Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. 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.</p> <p>The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p><u>Section 2 - Secured by Design Conditions and Informative:</u></p> <p>In light of the information provided, we request the following Conditions and Informative:</p> <p><u>Conditions:</u></p> <p>A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development.</p>	
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	<p>The development shall only be carried out in accordance with the approved details.</p> <p>B. Prior to the first occupation of each building or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.</p> <p><u>Informative:</u></p> <p>The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p> <p><u>Section 3 - Conclusion:</u></p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p>	
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Appendix 4 – Consultation Responses from Local Residents

LOCAL REPRESENTATIONS: 5 INDIVIDUAL RESPONSES IN OBJECTION / COMMENT	Summary of objection	Response
	Material planning considerations	
	<ul style="list-style-type: none"> Loss of privacy 	The proposed building is well-separated from nearby homes to a degree that is typical of an urban residential area.
	<ul style="list-style-type: none"> Loss of daylight 	Daylight impact has been assessed and there would be no significant loss of daylight to nearby homes.
	<ul style="list-style-type: none"> Increased noise disturbance 	The development is for residential use which is not significantly noise-creating. Plant and equipment noise would be controlled by condition.
	<ul style="list-style-type: none"> Low residential quality 	The internal space and amenity standards meet the requirements of the Mayor's Housing SPG. Most flats are dual aspect, and all have access to a communal garden. The residential quality is therefore considered to be good.
	<ul style="list-style-type: none"> Loss of parking 	There is no parking on the site at present other than for business-related vehicles. Two new parking spaces would be provided.

	<ul style="list-style-type: none"> • Loss of safety and security 	The Met Police have been involved in the design of the building and support the proposals. The building would be well-lit with lots of natural surveillance.
	<ul style="list-style-type: none"> • Disturbance from construction works 	Construction works are a temporary nuisance and would be controlled by non-planning legislation. A condition is also included to ensure works are managed to minimise disturbance.
	Non-planning considerations	
	<ul style="list-style-type: none"> • Insufficient resident notification 	92 neighbouring residents have been consulted via letter which covers all residential properties in the immediate vicinity of the site. Public notices have also been posted close to the site. Consultations have been undertaken in accordance with the Council's Statement of Community Involvement.