

## Appendix 2: Consultation Responses

### Consultee Responses

Stakeholder	Question/Comment	Response
<b>INTERNAL</b>		
<b>Arboricultural Officer</b>	<p>I hold no objections, from an arboricultural point of view to the proposal. An arboricultural tree survey has been carried out by Arbtech Consulting. The report has been carried out to British Standard 5837: 2012 Trees in relation to design, demolition and construction- Recommendations and is dated 26<sup>th</sup> August 2022.</p> <p>I concur with much of the report including the tree quality classification. Three low grade tree have been designated fells ( one U Plum Cherry and two category C trees a Whitebeam and Cherry).</p> <p>Providing all the sections within the report are adhered to and conditioned including the tree protection plan, site specific arboricultural method statements, and onboard arboriculturist to completion I hold no objections.</p> <p>Special attention to the works within the root protection areas of T31, T32, T35 and 37 have been highlighted. The proposed operations appear feasible.</p> <p>A landscape plan highlights new planting ad trees however, no species list of specification has been given. We would like to see good diversity, interest, urban fitness, net gain in canopy cover, a five-year aftercare plan to establish independence in the landscape, and replacement of any losses.</p>	Comments noted.
<b>Building Control</b>	<p>This office has no objection to this planning application. This type of application will be subject to 'Gateway 1' consultation with the fire authority, and a full building regulations review will be undertaken as part of the Building Control process.</p> <p>Building Control have the following comments to make: Part B: Fire safety 1- Level of fire protection and fire resistance to corridor serving the firefighting shaft at ground floor to be agreed with the Fire Authority.</p>	Comments noted.

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	<p>2- Fire Evacuation alert system to be provided in accordance with BS8629.</p> <p>3- Alternative means of escape from the ground floor wheelchair unit to be developed.</p> <p>Part O: Overheating:</p> <p>4- To achieve the optimum thermal comfort levels for occupants, all windows will have to be fully operable at all times, which may be difficult to achieve particularly at ground and first-floor levels for extreme weather scenarios.</p> <p>Part M: Access</p> <p>5- Clarify which flats are to achieve M4 (1) &amp; M4(2) as stated in clause 6.46 of planning statement.</p> <p>6- Approved Document M4(3) covers both adaptable, M4(3)(2)(a), and accessible, M4(3)(2)(b), units; Planning statement not clear if the single wheelchair unit is adaptable or fully accessible.</p>	
<b>Carbon Management</b>	<p><b>Response 18/01/2023</b></p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> <li>• Energy Assessment prepared by Eight Versa (dated 6 October 2022)</li> <li>• Overheating Analysis (prepared by Eight Versa (dated 6 October 2022)</li> <li>• Lifetime Carbon Assessment prepared by JAW (dated 20 October 2022)</li> <li>• Sustainability Statement prepared by Eight Versa (dated 28 September 2022)</li> <li>• Relevant supporting documents.</li> </ul> <p>1. Summary</p> <p>The development achieves a reduction of 84% carbon dioxide emissions on site, which is supported in principle. However, this application was submitted before 1st January 2023, so the strategy and the carbon reduction figures should be calculated under Part L 2013 and SAP10 carbon factors to be policy compliant.</p> <p>Some further minor clarifications must be provided with regard to the Energy Strategy. Planning conditions have been recommended to secure the benefits of the scheme and deal with the outstanding information in the Energy Strategy.</p> <p>The proposed biodiversity and climate change adaptation benefits are supported in this application.</p>	<p>Comments noted and conditions/obligations attached.</p>

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	<p>2. Energy – Overall Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013)). The London Plan (2021) further confirms this in Policy SI2.</p> <p>The overall predicted reduction in CO2 emissions for the development shows an improvement of approximately 84% in carbon emissions with SAP10.2 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 12.5 tonnes of CO2 from a baseline of 14.9 tCO2/year.</p> <p>London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are: 18.52 tCO2</p> <p>Residential (SAP10.2 emission factors)</p> <table border="1" data-bbox="546 738 1720 1086"> <thead> <tr> <th></th> <th>Total regulated emissions (Tonnes CO2 / year)</th> <th>CO2 savings (Tonnes CO2 / year)</th> <th>Percentage savings (%)</th> </tr> </thead> <tbody> <tr> <td>Part L 2021 baseline</td> <td>14.89</td> <td></td> <td></td> </tr> <tr> <td>Be Lean</td> <td>13.16</td> <td>1.74</td> <td>11.7%</td> </tr> <tr> <td>Be Clean</td> <td>13.16</td> <td>0</td> <td>0%</td> </tr> <tr> <td>Be Green</td> <td>2.39</td> <td>10.77</td> <td>72.3%</td> </tr> <tr> <td>Cumulative Savings</td> <td></td> <td>12.51</td> <td>84%</td> </tr> <tr> <td>Carbon Shortfall to offset (tCO2)</td> <td>2.39 (TBC)</td> <td></td> <td></td> </tr> </tbody> </table> <p>Energy – Lean The applicant has proposed a saving of 1.74 tCO2 in carbon emissions (11.7%) through improved energy efficiency standards in key elements of the build. This goes beyond the minimum 10% in principle, but this should be achieved with SAP2012 carbon factors.</p> <p>The following u-values, g-values and air tightness are proposed:</p> <table border="1" data-bbox="546 1358 1720 1394"> <tbody> <tr> <td>Floor u-value</td> <td>0.10 W/m2K</td> </tr> </tbody> </table>		Total regulated emissions (Tonnes CO2 / year)	CO2 savings (Tonnes CO2 / year)	Percentage savings (%)	Part L 2021 baseline	14.89			Be Lean	13.16	1.74	11.7%	Be Clean	13.16	0	0%	Be Green	2.39	10.77	72.3%	Cumulative Savings		12.51	84%	Carbon Shortfall to offset (tCO2)	2.39 (TBC)			Floor u-value	0.10 W/m2K	
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	External wall u-value	0.16 W/m <sup>2</sup> K	
	Roof u-value	0.10 W/m <sup>2</sup> K	
	Door u-value	1.30 W/m <sup>2</sup> K	
	Window u-value	1.10 W/m <sup>2</sup> K	
	G-value	0.45	
	Air permeability rate	3 m <sup>3</sup> /hm <sup>2</sup> @ 50Pa	
	Ventilation strategy	Mechanical ventilation with heat recovery (MVHR 94% efficiency; 0.4-0.43 W//s Specific Fan Power) Natural ventilation	
	Thermal bridging	Accredited Construction Details	
	Low energy lighting	100% with 100Lm/W; PIR sensors	
	Heating system (efficiency / emitter)	Gas boiler (baseline); 89.5% efficiency	
	Thermal mass	High	
	Space heating requirement	9 kWh/m <sup>2</sup> /year	
	Improvement from the target fabric energy efficiency (TFEE)	2% improvement, from 42.2 to 43 MWh/year	
	Primary Energy	66% improvement, from 26.4 to 77.5 MWh/year	
Overheating is dealt with in more detail below.			
Energy – Clean			
<p>London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs.</p>			

Stakeholder	Question/Comment	Response
	<p>The applicant is not proposing any Be Clean measures. The site is not within reasonable distance of a proposed Decentralised Energy Network (DEN). A Combined Heat and Power (CHP) plant would not be appropriate for this site.</p> <p>Energy – Green</p> <p>As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.</p> <p>The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 10.77 tCO<sub>2</sub> (72.3%) reduction of emissions are proposed under Be Green measures.</p> <p>The solar array peak output would be 15.18 kWp, which is estimated to produce around 13,110 kWh/year of renewable electricity per year, equivalent to a reduction of 1.8 tCO<sub>2</sub>/year. The array of 46 panels would be mounted on a roof area of around 90 m<sup>2</sup>, at a 30° angle, facing south.</p> <p>The communal air-to-water ASHP system (min. SCOP of 2.80) will provide hot water and heating to the dwellings through underfloor heating for 80% of demand (with an electric immersion heater providing the remaining 20%). A distribution loss of less than 1.1 should be achieved.</p> <p>Actions:</p> <ul style="list-style-type: none"> <li>- How will the solar energy be used on site (before surplus is exported onto the grid)?</li> <li>- Please identify on the plans where the air source heat pumps will be located and how the units will be mitigated in terms of visual and noise impact.</li> </ul> <p>Energy – Be Seen</p> <p>London Plan Policy SI2 requests all developments to ‘be seen’, to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies.</p>	

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	<p>The applicant should install metering equipment on site, with sub-metering by dwelling.</p> <p>Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: (<a href="https://www.london.gov.uk/what-wedo/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoringguidance/be-seen-planning-stage-webform">https://www.london.gov.uk/what-wedo/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoringguidance/be-seen-planning-stage-webform</a>)</p> <p>3. Carbon Offset Contribution A carbon shortfall of 2.39 tCO<sub>2</sub>/year remains based on SAP10.2 factors. The remaining carbon emissions will need to be offset at £95/tCO<sub>2</sub> over 30 years. This generates an indicative offset contribution of £6,805 but will need to be recalculated.</p> <p>4. Overheating London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.</p> <p>In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled 48 habitable rooms, 15 homes and 0 corridors under the London Weather Centre files.</p> <p>Results are listed in the table below.</p> <table border="1" data-bbox="546 1114 1720 1326"> <thead> <tr> <th></th> <th>Number of habitable rooms pass TM59</th> </tr> </thead> <tbody> <tr> <td>DSY1 2020s</td> <td>48/48</td> </tr> <tr> <td>DSY2 2020s</td> <td>23/48</td> </tr> <tr> <td>DSY3 2020s</td> <td>20/48</td> </tr> <tr> <td>DSY2 2020s (with mitigation)</td> <td>23/48</td> </tr> <tr> <td>DSY3 2020s (with mitigation)</td> <td>23/48</td> </tr> </tbody> </table>		Number of habitable rooms pass TM59	DSY1 2020s	48/48	DSY2 2020s	23/48	DSY3 2020s	20/48	DSY2 2020s (with mitigation)	23/48	DSY3 2020s (with mitigation)	23/48	
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	<p>All rooms pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:</p> <ul style="list-style-type: none"> <li>- Natural ventilation, with openable areas of 60% with secure night-time vents at ground floor for openable windows</li> <li>- MVHR with summer bypass</li> <li>- Glazing g-value of 0.45</li> <li>- Fixed shading: side fins and external louvres</li> <li>- No active cooling</li> </ul> <p>Proposed future mitigation measures include:</p> <ul style="list-style-type: none"> <li>- Reduce g-value to 0.2</li> <li>- Further external shading</li> </ul> <p>The submitted overheating strategy is considered acceptable.</p> <p>5. Sustainability</p> <p>Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including transport and connectivity, health and wellbeing, materials and waste, water efficiency, flood risk mitigation and SuDS, adaptation to climate change, energy and CO2 emissions and land use and ecology.</p> <p>Urban Greening / Biodiversity</p> <p>All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff.</p>	

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	<p>The development achieves an Urban Greening Factor of 1.73, which far exceeds the interim minimum target of 0.4 for predominantly residential developments in London Plan Policy G5. The proposed extensive landscaping with flood risk mitigation and climate change adaptation benefits is supported.</p> <p>No Biodiversity Net Gain calculation can be found. This should be submitted against the 10% requirement as set out in the Environment Act 2021.</p> <p>Living roofs All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5.</p> <p>The development is proposing an extensive living roof in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition.</p> <p>Whole Life-Cycle Carbon Assessments Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.</p> <p>This application is not required to submit a full statement. However, the total calculated emissions based on the GIA (without grid decarbonisation) is estimated at:</p> <table border="1" data-bbox="546 1211 1720 1382"> <thead> <tr> <th data-bbox="546 1211 938 1283"></th> <th data-bbox="945 1211 1328 1283">Estimated carbon emissions</th> <th data-bbox="1335 1211 1720 1283">GLA benchmark</th> </tr> </thead> <tbody> <tr> <td data-bbox="546 1287 938 1382">Modules A-C (excl B6, B7 and incl. sequestration)</td> <td data-bbox="945 1287 1328 1382">721.8 kgCO<sub>2</sub>e/m<sup>2</sup></td> <td data-bbox="1335 1287 1720 1382">Meets GLA target (&lt;1200 kgCO<sub>2</sub>e/m<sup>2</sup>) and the aspirational benchmark</td> </tr> </tbody> </table>		Estimated carbon emissions	GLA benchmark	Modules A-C (excl B6, B7 and incl. sequestration)	721.8 kgCO <sub>2</sub> e/m <sup>2</sup>	Meets GLA target (<1200 kgCO <sub>2</sub> e/m <sup>2</sup> ) and the aspirational benchmark	
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	<div style="border: 1px solid black; padding: 2px; margin-bottom: 10px;">(&lt;800 kgCO2e/m2).</div> <p data-bbox="539 304 1066 336">6. Planning Obligations Heads of Terms</p> <p data-bbox="539 339 1727 403">- Estimated carbon offset contribution (and associated obligations) of £6,805 (indicative), plus a 10% management fee (based on £2,850 per tonne of carbon emissions)</p> <p data-bbox="539 440 842 472">7. Planning Conditions</p> <p data-bbox="539 475 707 507">Energy Plan</p> <p data-bbox="539 510 824 542">Sustainability Review</p> <p data-bbox="539 545 835 577">Occupant Energy Use</p> <p data-bbox="539 580 663 612">Be Seen</p> <p data-bbox="539 616 707 647">Overheating</p> <p data-bbox="539 651 696 683">Living Roof</p> <p data-bbox="539 686 696 718">Biodiversity</p> <p data-bbox="539 743 842 775"><b>Response 16/02/2023</b></p> <p data-bbox="539 778 1308 810">In preparing this consultation response, we have reviewed:</p> <ul data-bbox="539 813 1532 877" style="list-style-type: none"> <li>• Energy Assessment prepared by Eight Versa (dated 30 January 2023)</li> <li>• Sustainability Statement prepared by Eight Versa (dated 30 January 2023)</li> </ul> <p data-bbox="539 912 674 944">Summary</p> <p data-bbox="539 948 1727 1011">Revised carbon reduction calculations have been undertaken in line with Part L 2013. The revised performance has been noted below.</p> <table border="1" data-bbox="546 1046 1485 1353"> <thead> <tr> <th data-bbox="546 1046 779 1182"></th> <th data-bbox="786 1046 1014 1182">Total regulated emissions (Tonnes CO2 / year)</th> <th data-bbox="1021 1046 1249 1182">CO2 savings (Tonnes CO2 / year)</th> <th data-bbox="1256 1046 1485 1182">Percentage savings (%)</th> </tr> </thead> <tbody> <tr> <td data-bbox="546 1187 779 1251">Part L 2013 baseline</td> <td data-bbox="786 1187 1014 1251">17.30</td> <td data-bbox="1021 1187 1249 1251"></td> <td data-bbox="1256 1187 1485 1251"></td> </tr> <tr> <td data-bbox="546 1256 779 1287">Be Lean</td> <td data-bbox="786 1256 1014 1287">14.14</td> <td data-bbox="1021 1256 1249 1287">3.16</td> <td data-bbox="1256 1256 1485 1287">18.3%</td> </tr> <tr> <td data-bbox="546 1292 779 1324">Be Clean</td> <td data-bbox="786 1292 1014 1324">14.14</td> <td data-bbox="1021 1292 1249 1324">0</td> <td data-bbox="1256 1292 1485 1324">0%</td> </tr> <tr> <td data-bbox="546 1329 779 1361">Be Green</td> <td data-bbox="786 1329 1014 1361">4.17</td> <td data-bbox="1021 1329 1249 1361">9.98</td> <td data-bbox="1256 1329 1485 1361">57.7%</td> </tr> </tbody> </table>				Total regulated emissions (Tonnes CO2 / year)	CO2 savings (Tonnes CO2 / year)	Percentage savings (%)	Part L 2013 baseline	17.30			Be Lean	14.14	3.16	18.3%	Be Clean	14.14	0	0%	Be Green	4.17	9.98	57.7%	
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	Cumulative savings		13.14	75.9%	
	Carbon shortfall to offset (tCO <sub>2</sub> )	4.17			
	Carbon offset contribution	£95 x 30 years x 4.17 tCO <sub>2</sub> /year = £11,884.50			
	<p>An estimated reduction of emissions of 76% can be achieved on this site.</p> <p>A carbon offset contribution of £11,884.50 is due to make this development policy compliant</p> <p>Conclusion The revised information is acceptable and sufficient to support this development.</p>				
<b>Conservation Officer</b>	<p>The proposed development will be erected on a rectangular sized, compact site fronting Boyton Road and located to the east of the Campsbourne Cottages Conservation Area that includes the locally listed Campsbourne School.</p> <p>It is a residential development with a compact yet interestingly articulated plan form comprising three blocks respectively 4, 5 and 7 storeys high.</p> <p>This new building will be located adjacent to the existing 6 -storey-on-pilotis Wat Tyler house, and by virtue of its articulated plan form and interestingly varied height will mediate between the scale and appearance of Wat Tyler and other more traditional, low-rise houses located in the immediate surrounding of the development site.</p> <p>The scale, height and overall proportions of the proposed scheme appear as a successful, context-led, design response to the surrounding urban character. The proposed scheme and landscape design have great potential to enhance the urban quality of the area in the setting of the Conservation Area. However, the new development will be barely visible from the Conservation Area and in the background of Campsbourne school in eastward views towards the development site and it will therefore have a neutral impact on the character and appearance of the Conservation Area and will cause no harm to its significance.</p>				Comments noted.

Stakeholder	Question/Comment	Response
	<p>The proposed scheme is fully supported from the conservation standpoint.</p>	
<p><b>Flood Water &amp; Management</b></p>	<p>Having reviewed the applicant's submitted RIBA Stage 2, SuDS Strategy, Boyton Road report reference number 5641 - Boyton Road - SuDS Strategy-2209-08nv issue number 1, dated 8th September 2022 as prepared by Eight Verga consultant, we are generally content with the overall methodology as mentioned within the above documents, subject to following planning conditions to be implemented regarding the Surface water Drainage Strategy and it's management and maintenance plan.</p> <p>Surface Water Drainage condition</p> <p>No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate that :</p> <p>a) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method.</p> <p>b) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development.</p> <p>c) The development shall not be occupied until the Sustainable Drainage Scheme for the site has been completed in accordance with the approved details and thereafter retained.</p> <p>Reason : To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter.</p> <p>Management and Maintenance condition</p> <p>Prior to occupation of the development hereby approved, a detailed management maintenance plan for the lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage scheme throughout the lifetime of the development. The Management Maintenance</p>	<p>Comments noted and conditions attached.</p>

Stakeholder	Question/Comment	Response
	<p>Schedule shall be constructed in accordance with the approved details and thereafter retained.</p> <p>Reason: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system</p>	
<b>Pollution</b>	<p>Having considered all the relevant supportive information especially the Energy Statement dated 6th October, 2022 with the use of Air Source Heat Pump (ASHP) and Photovoltaic Panels (PV) as the development source of energy, Air Quality Assessment Report with reference 20-7053 prepared by Syntegra Consulting Ltd dated October 2022 taken note of sections 3 (Methodology), 4 (Baseline), 5 (Assessment), 6 (Air Quality Neutral Assessment) and 7 (Conclusions) as well as Phase I Environmental Report with reference 1059 – P1E – 1 – A prepared by Contaminated Land Solutions Ltd dated 11th January 2020 taken note of sections 7 (Site History), 9 (Potential Contamination), 10 (Risk Assessment), 11 (Site Work), 12 (Site Development Considerations) and 13 (Conclusions), 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 and informative are recommend should planning permission be granted.</p> <p>Conditions</p> <ul style="list-style-type: none"> <li>- Land Contamination</li> <li>- Unexpected Contamination</li> <li>- NRMM</li> <li>- Demolition/Construction Environmental Management Plan</li> </ul>	<p>Commented noted and conditions attached.</p>
<b>Transportation</b>	<p>Location and access</p> <p>This site is located to the eastern side of Boynton Road, north of the junction of Boynton Road with Eastfield Road. It has a PTAL value of 1B, considered 'very poor' accessibility to public transport services. The only public transport services included within the PTAL/WEBCAT walk criteria are 2 bus services, which are 7 to 8 minutes' walk from the site at Hornsey High Street.</p> <p>However, just outside of the PTAL/WEBCAT walk distance criteria are additional bus services plus Hornsey Railway Station (a 14-minute walk). These services are not</p>	<p>Comments noted and conditions attached.</p>

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	<p>considered beyond what most occupiers will be comfortable to walk to, so the site is perhaps better located for public transport than the PTAL value indicates.</p> <p>The site is not within any of the Borough's formal CPZs, the nearest is the Hornsey North CPZ, which is 200 - 300m to the south of the site.</p> <p>Active travel audit The TA includes an Active Travel Audit, which looks at the locations/connections to local shops, services and facilities. As commented earlier Hornsey Station is around a 14 minute walk from the site, and other local facilities are within short walks. Alexandra Park is a 4 minute walk away, the High Street in Hornsey with multiple shops and local services is a 5 – 6 minute walk away, so many essential services and shops are close by such as food shops, pharmacies etc.</p> <p>Road safety/accident history For the 5 year period to September 2021, 6 accidents were recorded within the area surrounding the site. There were no recorded accidents within Boyton Road or any of the other roads to the perimeter of the site used for direct access. The accidents recorded were some distance from the site on High Street, Priory Road and Tottenham Lane. Current records do not indicate a road safety issue along the streets directly accessing this site.</p> <p>Healthy Streets Assessment A number of routes to local facilities to and from the site have been reviewed, these are to;</p> <ul style="list-style-type: none"> <li>• Hornsey Station</li> <li>• Alexandra Park and Alexandra Palace Station</li> <li>• St Mary's Church of England Primary &amp; Junior School</li> <li>• Queenswood Medical Centre</li> </ul> <p>The route assessment/inspections report that three of the routes are pleasant and comfortable, and no improvements are recommended. The survey details that there are sections of the route to The Queenswood Medical centre where the footway surface quality is poor, particularly along Barrington Road, where there also trees causing width restrictions</p>	

Stakeholder	Question/Comment	Response
	<p>along the footway, and an absence of tactile paving at some crossovers along Hornsey High Street.</p> <p>The survey also recorded there is no step free access at either of the two rail stations.</p> <p>3 of the four routes reviewed do not require any improvements as such and provide a good and encouraging environment for walking. The issues that were recorded with the route to the medical centre could be partly addressed by Highway/footway maintenance, and the issue of step free access at the railway stations is out of the scope of this development of course. In balance, the walk routes are encouraging with respect to foot trips to the local facilities for this site.</p> <p>Trip generation The TA details the proposed/predicted trip generation for this development. The absolutely numbers given is only 15 units are low, and will not create any tangible highway or public transport network and service impacts. The 2011 census was used to predicted mode share, and this detailed the car mode share for journeys to work at 34%. It is expected this mode share will have reduced since the surveys for the 2011 census due to the uplift in walking, cycling and public transport mode shares since then.</p> <p>Car Parking considerations This development is proposed as car free, and also includes commentary that upon reinstatement of the to be redundant crossover at the existing car park access, a blue badge bay can be implemented at the kerbside. The physical works for reinstating the crossover and implementing the blue badge bay should be included in and funded by this development.</p> <p>In order to build out this development, there will be a loss of 24 off street parking spaces. It is assumed these spaces are currently allocated to Homes for Haringey tenants, with some form of permit management arrangements.</p> <p>A Parking Stress Survey has been submitted, which was carried out during June 2021. This recorded stresses and activity within both the public highway streets and Homes for Haringey areas and parking courts. Surveys were carried out both for two overnight scenarios plus a midday. The highest stresses were unsurprisingly recorded with the overnight surveys.</p>	

Stakeholder	Question/Comment	Response
	<p data-bbox="544 264 1731 432">On the busiest night the survey recorded an overall parking stress of 87%, with 96 spaces available out of 714. Breaking that down into on street and off highway spaces, 66 spaces were available out of 506, and within HfH streets/courts, 30 spaces available out of 208. Parking stresses in percentage terms were identical. 22 vehicles were observed parking within the 24 space car park which is intended to be redeveloped.</p> <p data-bbox="544 469 1731 600">The available spaces on the highway were concentrated within the adjacent and closest streets to the site, namely Boyton Road (19 spaces) Eastfield Road (14 spaces), and Newland Road (10 spaces). Smaller amounts of availability were recorded on other close streets and within the HfH parking courts.</p> <p data-bbox="544 638 1731 839">The above stresses were calculated/based on a 5m car length. A 6m car length was also considered with the parking survey data recorded, and the TA details that this would result in stresses of 100% plus within the unrestricted parking areas, and in excess of this in some streets. Whilst it is generally appropriate to consider a 6m car length in some instances, with this proposal, given there were multiple spaces observed as available within the surveys, the 5m car length is more appropriate with regards to reflecting actual parking conditions.</p> <p data-bbox="544 876 1731 1211">The redevelopment of the car park will lead to additional parking demands materialising on street, from both the current car park users, plus any new parking demands that arise from the 15 units proposed. Local levels of car ownership recorded in the 2011 census were 0.43 vehicles per household, across all dwelling sizes and tenure types. This level of car ownership is likely to have reduced slightly since the time of this survey, as has happened London wide. It is also noted that only one of the proposed dwellings here is a family sized unit, otherwise there are 1 and 2 bedroom units proposed which normally display lower levels of car ownership than family sized units. Therefore, it is likely that demands from the 15 proposed 1 and 2 bedroom units will be relatively minor. The TA suggests a demand of 6 vehicles arising from the new units, which would be the basis for assessment.</p> <p data-bbox="544 1248 1731 1345">The additional demands arising would therefore be for 28 vehicles seeing to park in total, which would raise local parking stresses from 87% to 91%, with 68 parking spaces remaining available.</p>	

Stakeholder	Question/Comment	Response
	<p>Summarising with respect to car parking, the additional demands from the 15 new units are not expected to be excessive, however the relocation of the vehicles currently using the car park will be onto the local roads close to the development site. Parking stresses will increase and levels are already in the range considered to be 'stressed' given then exceed 85%. However, it is acknowledged that there would still be an estimated 68 spaces available within a 200m walk of the site.</p> <p>As this site is not within any formal CPZ, and the PTAL of the site is low it is not possible to formalise the development as permit free to reduce new parking demand.</p> <p>The provision of sustainable transport initiatives to potentially reduce car ownership and usage demands from the new units will be essential, and these will include the provision of high quality, conveniently located and secure cycle parking for all residents, provided to the requirements of the London Plan and designed to the requirements of the London Cycle Design Standards. Provision of a car club facility has been proposed.</p> <p><b>Car club provision</b>  The applicant has provided the recommendations of Enterprise Car Club for this development proposal. Their recommendation is for funding of three years membership for each unit, with all living at each address eligible for use of car club vehicles. There are vehicles already operating by this car club in the locality so there are no proposals for the funding/provision of additional vehicles. The availability of a car club facility should contribute towards reducing parking demands from the 15 new units.</p> <p><b>Delivery and servicing arrangements/refuse and recycling collections</b>  The TA details two delivery and servicing visits for the 15 new units per day. This does sound somewhat 'light, however the total daily number is not expected to be problematical. Any visiting delivery or service vehicles will need to find a location to park dwell on street. The daytime Parking stress surveys did record greater availability of on street spaces compared to the overnight surveys (which is to be expected), so it is not expected the new delivery and servicing trips will create any adverse impacts.</p> <p>As for the waste and recycling collections, it is expected that these will take place from the street post development which the TA references is how collections are made at present.</p>	



Stakeholder	Question/Comment	Response
	<p>The uplift from 15 units is not expected to add any particularly long dwell times or create any issues, colleagues in the waste management team have responded to the consultation and have not raised any issues with regards to the proposed arrangements.</p> <p>Emergency services vehicle access Responses from Fire service to this application have indicated that the development as proposed is acceptable from the emergency services/fire access perspective.</p> <p>Cycle parking 28 long stay and 2 short stay cycle parking spaces are proposed, with the long stay within two separate cycle stores. A two-level stacking system is proposed, and the two external spaces would be provided by using Sheffield Stands for visitors.</p> <p>All cycle parking is to be designed and detailed to meet the London Cycle Design Standards as produced by TfL. Fully detailed and dimensioned drawings showing the access routes to and from cycle parking, spacings, headroom and manoeuvring space that meets the installation specification for the parking systems chosen are required. These details should ideally be provided pre decision, however a pre commencement condition will also suffice. The details must demonstrate that high quality, attractive and useable cycle parking will be provided that will encourage the uptake of cycling by occupiers and visitors.</p> <p>Construction Phase Given the site's location adjacent to the public highway and other residential properties a Construction Logistics Plan will be required. This should detail how the construction of the development will be managed to minimise and mitigate any construction related impacts on the safe and smooth operation of the public highway and adjacent neighbours. The applicant should engage with the Council's Network Management and Highways Officers to discuss the details of how the build out will be serviced especially with regards to any temporary arrangements on the public highway.</p> <p>A draft outline document has been included in the application which gives some useful details as to how the development is intended to be built out from the transport/highways perspective.</p>	

Stakeholder	Question/Comment	Response
	<p>The build out is expected to take 70 weeks in total, and in order to access/service the build, some parking bay suspensions and narrowing of footways is envisaged. The applicant will need to liaise and agree any temporary highway arrangements with Highways Officers. It is also noted in the draft that overall construction vehicle movement numbers to and from the site will be low, and that all arrivals and departures will be managed using a slot booking system and be confined to the period 0930 – 1430 to avoid impacting on school arrival/departures times and the AM/PM peak periods on the Highway.</p> <p>A fully detailed CLP, which includes the outcomes of liaising with Highways Officers will be required for review and approval prior to commencement of the physical works and this can be covered by a pre commencement condition.</p> <p>Summary  This application from the Housing team is for the redevelopment of the HFH off street resident's car park adjacent to Wat Tyler House, to construct 15 new residential units. A TA accompanies the application. The main considerations relate to access, car and cycle parking, delivery and servicing arrangements and the build out of the development.</p> <p>The area currently experiences what are considered as high existing parking stresses, exceeding 85%, however a sizeable number of spare spaces were recorded within the survey area (96 in total). The loss of the existing off highway parking court for existing residents will add further demands, and there will be a small new demand expected from the 15 new units, however only one of these is a family sized unit. This is predicted to increase local parking stresses from 87% to 91%, albeit 68 spaces are expected to remain available within the 200m walk radius of the site.</p> <p>Mitigation of the new parking demands can arise from the provision of a car club facility and high quality, easily useable and secure/attractive cycle parking. It is noted that despite the low PTAL value, essential shops and services are available within a 4 to 5 minute walk as are local bus services, and Hornsey Station is a 14 minute walk away which is expected to be acceptable to most new residents.</p>	

Stakeholder	Question/Comment	Response
	<p>Considering where the available space was recorded in the parking stress survey, it is likely some of the displaced residential parking will move to these as they are the closest to Wat Tyler House.</p> <p>There is no apparent accident issue or road safety situation in the immediate locality of the site at present, and additional delivery and servicing demands in terms of vehicle movements will be low. The Fire service have commented that they have no concerns with regards future emergency access.</p> <p>Subject to the following, Transportation do not object to this application;</p> <ul style="list-style-type: none"> <li>• Pre commencement condition for submission and approval of all cycle parking details</li> <li>• Pre commencement condition for submission and approval of a Construction Logistics Plan</li> <li>• Reinstatement of the redundant crossover at the car park entrance and implementation of a new blue badge bay</li> <li>• Implementation of the car club facility as proposed by Enterprise car club, to include 3 years membership and a driving credit (as detailed in appendix G of the TA).</li> </ul>	
Waste Management	The details provided for this development meet the requirements for refuse and recycling storage for a scheme of this size. Waste is segregated into food, recycling and refuse as advised and the number of containers is sufficient for the new housing units. Distances to the bin storage area for collection purposes and for residents to deposit their waste and recycling are within the British standards guidance and containers are accessible for servicing.	Comments noted.
<b>EXTERNAL</b>		
Health & Safety Executive	<p>Scope of consultation</p> <p>It is noted that the above application relates to a development containing one building with split height storey levels of 4, 5 and 7-storeys and an overall building height of</p>	Comments regarding fire safety and means of escape noted.

Stakeholder	Question/Comment	Response
	<p>19m.</p> <p>The proposed building comprises ancillary accommodation at ground and 5th floor levels and plant areas located at 4th, 5 th and 7th floor roof levels. Residential accommodation is located on every floor level (ground to 6th floor inclusive).</p> <p>The proposed building is served by a single staircase. The single staircase constitutes the only escape staircase and only firefighting staircase serving dwellings on upper floors. Section 6 within the fire statement confirms that the building has been designed using Approved Document B: volume 1 (ADBv1). HSE has assessed the application accordingly.</p> <p>Following a review of the information provided in the application, HSE has identified the fire safety concern detailed below.</p> <p><b>Means of escape</b>  The ground floor plan shows ancillary accommodation (comprising cycle stores) connecting to the single staircase. Fire safety standards state that “where a common stair is not part of the only escape route from a flat, it may also serve ancillary accommodation from which it is separated by a protected lobby or protected corridor (minimum REI 30).”</p> <p>Additionally, the ancillary accommodation located at ground is located on the same storey as residential accommodation. Fire safety standards state that ancillary accommodation should not be located in, or entered from, a protected lobby or protected corridor forming the only common escape route on that storey.</p> <p>Design changes necessary to ensure the ancillary accommodation does not connect with the single staircase at ground floor level will affect land use planning considerations relating to the appearance of the development, where the internal access is removed, and external access is provided.</p> <p><b>Supplementary information</b>  The following information does not contribute to HSE’s substantive response and should</p>	<p>These comments are addressed in the fire safety section of the report.</p>

Stakeholder	Question/Comment	Response
	<p>not be used for the purposes of decision making by the local planning authority.</p> <p>PV panels The roof plan indicates the proposal to install photovoltaic panels (PV panels). Fire safety standards require suitable support of cabling to avoid obstruction of escape routes and firefighting access due to the failure of fixings. Where PV panels are proposed, consideration should be given to ensure that all power supplies, electrical wiring and control equipment is provided with appropriate levels of protection against fire.</p> <p>External wall systems Section 6 of the fire statement confirms that proposed external wall systems will achieve “Class A2-s1, d0 or better”. However, it is noted that the elevation drawings identify the use of metal external wall materials.</p> <p>It should be noted that on 1st December 2022, Building Regulations were amended and now state “Building work shall be carried out so that relevant metal composite material does not become part of an external wall, or specified attachment, of any building.” Confirmation should be provided about whether the proposed external wall systems include the prohibited relevant metal composite materials. This will be subject to consideration at later regulatory stages.</p>	
London Fire Brigade	<p>The Commissioner has been consulted with regard to the above-mentioned premises and makes the following observations: The Commissioner is satisfied with the proposals, subject to the following: 1) Meeting all requirements to Approved Document B Volume 1 B5. 2) 15.13; To assist the fire service to identify each floor in a block of flats with a top storey more than 11m above ground level (see Diagram D6), floor identification signs and flat indicator signs should be provided.</p>	Comments noted and informatives attached.
Metropolitan Police Designing Out Crime Officer	<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</p>	Comments noted and conditions/informative attached.

Stakeholder	Question/Comment	Response
	<p>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 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 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 to ensure that the development progresses with crime mitigation in mind. The comments made can be easily mitigated early if the Architects ensure the ongoing dialogue with our department and this continues throughout the design and build process. This can be achieved by the following Secured by Design conditions being applied (Section 2).</p> <p>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>Conditions:</p> <ul style="list-style-type: none"> <li>A. Secured by Design Accreditation</li> <li>B. Secured by Design Certification</li> </ul>	

Stakeholder	Question/Comment	Response
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 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 <a href="mailto:trade.effluent@thameswater.co.uk">trade.effluent@thameswater.co.uk</a> . Application forms should be completed on line via <a href="http://www.thameswater.co.uk">www.thameswater.co.uk</a>. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p> <p>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.  <a href="https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes">https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes</a></p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. “No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in</p>	Comments noted and conditions/informatives attached.

Stakeholder	Question/Comment	Response
	<p>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.</p> <p><a href="https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes">https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes</a> Should you require further information please contact Thames Water.</p> <p>Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a> Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm)</p> <p>Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG18DB</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.</p> <p>Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.</p> <p>Water Comments</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. 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</p>	



Stakeholder	Question/Comment	Response
	<p>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. <a href="https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-your-development/working-near-our-pipes">https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-your-development/working-near-our-pipes</a> Should you require further information please contact Thames Water. Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a></p> <p>Supplementary Comments.            TWUL would like to highlight the sensitive nature of the underlying Chalk aquifer. In this location there natural protection in the form of approximately 30m of low permeability clays overlying Thanet Sands, overlying the Chalk. If works are likely to penetrate more than 30mbgl please consult Thames Waters' Groundwater Resources Team Development close to Hornsey. Foundation design must not impact on Thanet Sand/Chalk aquifer. If piling is expected greater than 30m below ground level, then risk to the aquifer needs to be assessed.</p>	

### Representation from Neighbours

Matter Raised	Response
The height of the building does not complement the character of the street.	The scale and height of the development has been considered and officers consider that the height of the development is acceptable and relates well to the adjacent seven storey building at Wat Tyler House. The proposed building would not appear out of proportion in the locality and would not dominate in wider views.
Loss of light, overshadowing and loss of privacy would impact neighbouring properties.	The scheme has been designed to ensure that development would not materially impact neighbouring properties, in terms of light, overshadowing or privacy. Therefore, the amenity and living conditions of neighbouring properties would be protected.
The sunlight reaching the play area/park to the rear of the car park would be restricted.	The development would not be in such close proximity to the play/garden areas to the rear to cause material loss of sunlight. Therefore, the use of the nearby play/garden areas

	would not be compromised.
The Daylight & Sunlight Report requires thorough review. The VSC test in relation to Wat Tyler House requires further consideration and the daylight distribution test should be applied.	The Daylight & Sunlight Report has been thoroughly reviewed. The VSC test has been undertaken in line with the relevant guidance. Officers do not deem it necessary to undertake the daylight distribution test, as the VSC test indicates a high level of compliance with the relevant guidance.
On-street parking capacity would be adversely impacted.	A Parking Stress Survey has been undertaken, which indicates that there is space on local roads to accommodate the displaced parking and any additional parking demands arising from the development.
Traffic would be increased.	The Transport Statement estimates the number of trips by the private vehicle generated by the development. The level of trips generated would not materially impact the capacity of the local highway network.
Pollution would be generated.	The Air Quality Assessment outlines that the proposals should be air quality neutral, indicating that there would not be harmful levels of pollution resulting. Pollution during construction phase can be further controlled through a conditions requiring a Construction Environment Management Plan.
The construction phase would cause disruption to residents.	A Construction Logistics Plan can be secured via condition and this will ensure that disruption to nearby residents is minimised.
Construction traffic would endanger pedestrians and residents.	The construction phase should progress in a safe manner and the developer will be required to put in place safety measures to protect pedestrians/residents.
The growth in households would increase crime in the area.	The Metropolitan Police Designing Out Crime Officer has not raised concern regarding increased crime. The scheme has been designed in line with Secured By Design guidance, so to ensure that fear of crime is reduced.
CCTV would not assist in decreasing crime.	CCTV is one of the measures proposed by the applicant to

	assists in reducing the fear of crime.
Further details of landscaping improvements and play area enhancements are required.	Final details of landscaping should be secured via condition.
Landscaping improvements would not be maintained.	The recommended landscaping condition requires details of the long-term management programme for new trees. Furthermore, this condition secures the re-planting of any trees or plants that die within five years of completion of the development. The upkeep of landscaping on the wider estate would also continue to be undertaken through the Council's maintenance programmes. Therefore, officers consider that appropriate maintenance of landscaping would be undertaken.
The park is used for anti-social behaviour and enhancements would not assist this.	The scheme has been designed to reduce the likelihood of anti-social behaviour arising.