

### Appendix 3 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
<b>INTERNAL</b>		
<b>Transportation</b>	<p><u>Site location and access</u>            7 Cross Lane is to the eastern side of Cross Lane in Hornsey. It has a PTAL value of 3, which is considered 'medium' access to public transport services. 3 different bus services are accessible within 3 to 8 minutes' walk of the site, and Hornsey National Rail station is a 7-minute walk away.</p> <p>Whilst the site has a moderate PTAL value of 3 it is a short walking distance from an area of value 5 (very good accessibility to public transport services).</p> <p>The site is not within any of the Borough's CPZ's, but is quite close to the northern boundary of the Hornsey South CPZ, which has operating hours of 1100 – 1300.</p> <p>This site is to the immediate south of the appealed and granted/consented 69 unit development covered by HGY/2016/0086, and it is also opposite the recently built out Smithfield Square development on the western side of Cross Lane. The Pool Motors site (2020/1724) is immediately adjacent to the south.</p> <p><u>Proposals and transportation considerations</u>            The proposed development comprises the demolition of 814m<sup>2</sup> of existing musical studio and the construction of a mixed-use development comprising 9 apartments and 815m<sup>2</sup> of use-class E commercial floorspace (being assessed as former use-class B1, office). The development includes a 6 space basement car park (for the commercial component of the development), accessed via a ramp.</p> <p>There are 2 No. 1 bedroom flats, 5 No. 2 bedroom flats, and 2 No. 3 bedroom flats.</p> <p>Comments and the transportation aspects of the development proposal follow;</p> <p><u>Access arrangements and Visibility splays</u>            For the pedestrian and vehicular access to and from the site off Cross Lane, these have been requested and been provided, and they demonstrate satisfactory vehicular and pedestrian visibility splays. A Section 278 Agreement will be required for the highway works required to facilitate access to and from the development and the associated highway alterations.</p>	<p>Observations have been taken into account. The Recommended legal agreement clauses and conditions attached.</p>

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	<p><u>Car parking</u> Transportation seek a car-free legal agreement applying to both the commercial users and residential units, should the application be granted. The retention of six on-site car parking spaces is more than sufficient to meet the needs of the proposed commercial uses.</p> <p>For the residential components of the development, it is considered a car free development and status is appropriate to accord with current transportation policies and given the site's proximity to shops, services and public transport facilities. A car club facility will also be provided which will reduce the probability of private car ownership by occupiers of the new residential units. A CPZ contribution towards future parking controls is also appropriate, and a contribution of £6,000 has been agreed with the applicant.</p> <p><u>Cycle parking</u> 28 long stay and 4 short stay cycle parking spaces are proposed, the long stay located in the lower ground floor and the visitor spaces at ground floor level on the forecourt at the front of the development. All cycle parking must meet the requirements of the London Cycle Design Standards with respect to dimensions, details and layout.</p> <p><u>Proposed commercial and residential trips</u> The Transport Statement assessed the existing and proposed commercial trips separately, which was the correct approach. Although it is recognised that the proposed conversion from music studio use to office use would remain within the same land use class E, it is not agreed that the commercial conversion would be 'travel-neutral' on the basis that there is no change of land use under the new land use system. That would imply that the existing commercial use generated as many trips as the proposed office use, therefore underestimating the impact of the proposed development upon the local transport networks, especially the local pedestrian network. The statement that the commercial proposals are actually 'travel-neutral' (or at least introducing a reduction in trips) would only be valid if the existing commercial space were occupied by offices, which are likely to be the biggest trip generators within that class. For the purpose of the assessment, it is therefore considered that a distinction should continue to be made (as per the Transport Statement's methodology) and that it should feed back into both the multi-modal proposed and net trip generation assessments accordingly. However, in order to progress the review of the planning application, no further work on the trip generation assessment is asked of the applicant.</p>	

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	<p data-bbox="504 236 1070 261"><u>Net impact and cumulative impact assessments</u></p> <p data-bbox="504 268 1406 448">In line with previous comments, the total multi-modal trip generation of the proposed development should comprise both the trips generated by the flats and the commercial space, as was given in Table 10.8 of the Transport Statement. Table 10.8 was slightly revised in the transport consultant's response dated August 2021 (see below), and the net change in trips was shown underneath.</p> <p data-bbox="517 517 719 539"><b>Combined proposed</b></p> <table border="1" data-bbox="517 544 1312 667"> <thead> <tr> <th></th> <th>Veh</th> <th>Car Pass</th> <th>Ped</th> <th>Cycle</th> <th>Bus</th> <th>Train</th> <th>OGV</th> </tr> </thead> <tbody> <tr> <td>AM</td> <td>2</td> <td>1</td> <td>8</td> <td>1</td> <td>8</td> <td>17</td> <td>0</td> </tr> <tr> <td>PM</td> <td>3</td> <td>2</td> <td>10</td> <td>1</td> <td>7</td> <td>12</td> <td>0</td> </tr> <tr> <td>Daily</td> <td>20</td> <td>10</td> <td>147</td> <td>5</td> <td>44</td> <td>88</td> <td>0</td> </tr> </tbody> </table> <p data-bbox="517 699 629 721"><b>Net change</b></p> <table border="1" data-bbox="517 726 1312 849"> <thead> <tr> <th></th> <th>Veh</th> <th>Car Pass</th> <th>Ped</th> <th>Cycle</th> <th>Bus</th> <th>Train</th> <th>OGV</th> </tr> </thead> <tbody> <tr> <td>AM</td> <td>0</td> <td>1</td> <td>8</td> <td>1</td> <td>8</td> <td>17</td> <td>-1</td> </tr> <tr> <td>PM</td> <td>-2</td> <td>2</td> <td>-6</td> <td>0</td> <td>2</td> <td>11</td> <td>0</td> </tr> <tr> <td>Daily</td> <td>-9</td> <td>6</td> <td>99</td> <td>3</td> <td>34</td> <td>85</td> <td>-8</td> </tr> </tbody> </table> <p data-bbox="504 874 1581 995">The technical note prepared by the transport consultant has been reviewed and Table 4.3 shows the predicted net number of pedestrians, cyclists and drivers using Cross Lane during the network peak hours generated by the committed developments (Smithfield Yard, Smithfield Square and 7 Cross Lane), added to the baseline traffic flows.</p> <p data-bbox="524 1034 1160 1056"><b>Table 4.3 – Baseline plus committed development, Cross Lane</b></p> <table border="1" data-bbox="517 1061 1491 1184"> <thead> <tr> <th></th> <th>Pedestrian</th> <th>Cycle</th> <th>Vehicle</th> </tr> </thead> <tbody> <tr> <td>AM</td> <td>169</td> <td>18</td> <td>7</td> </tr> <tr> <td>PM</td> <td>126</td> <td>13</td> <td>7</td> </tr> </tbody> </table> <p data-bbox="504 1225 1592 1372">The transport consultant has argued that only the proposed flats would generate trips and have a net impact, as they consider the proposed commercial space to be 'travel-neutral'. However, as explained above, it is considered that the effect of the proposed commercial space should also be counted. Based on the proposed net change outlined in the Transport Statement and subsequently revised in the tables above, the combined effects of the</p>		Veh	Car Pass	Ped	Cycle	Bus	Train	OGV	AM	2	1	8	1	8	17	0	PM	3	2	10	1	7	12	0	Daily	20	10	147	5	44	88	0		Veh	Car Pass	Ped	Cycle	Bus	Train	OGV	AM	0	1	8	1	8	17	-1	PM	-2	2	-6	0	2	11	0	Daily	-9	6	99	3	34	85	-8		Pedestrian	Cycle	Vehicle	AM	169	18	7	PM	126	13	7	
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	<p>committed developments, the proposed developments and the baseline traffic along Cross Lane would be as follows:</p> <table border="1" data-bbox="506 325 1523 580"> <thead> <tr> <th></th> <th>Pedestrian</th> <th>Cycle</th> <th>Vehicle</th> </tr> </thead> <tbody> <tr> <td>AM</td> <td>169+8+8+17 = 202</td> <td>18+1 = 19</td> <td>7-1 = 6</td> </tr> <tr> <td>PM</td> <td>126-6+2+11 = 133</td> <td>13+0 = 13</td> <td>7-2 = 5</td> </tr> </tbody> </table> <p>The main difference with Table 5.2 in the technical note is the uplift in pedestrian traffic during the AM peak hour, with an extra 33 two-way pedestrian trips, or less than an additional two-way trip per minute attributable to the proposed Cross House development. However, it is acknowledged that the conclusion remains the same as that drawn by the transport consultant, namely that “the net change as a result of the Cross House scheme is likely to be less than daily variation and therefore imperceptible to other highway users.”</p> <p><u>Summary</u>  This application is for redevelopment of the existing site at 7 Cross Lane to provide a mixed use development comprising 815 sqm of Class E commercial floorspace and 9 residential units. Overall, this is acceptable in transportation terms, the relatively small nature of the development will not create any adverse transportation impacts, and the application is supported subject to the following S106 contributions and planning conditions listed below.</p> <p><u>S.106 Heads of Terms</u>  Car-free/capped development – both residential and commercial, including £4,000 towards the amendment of the local Traffic Management Order (also covering the cost of amending any existing yellow line restrictions, see further details under S.278 highway works agreement below).</p> <p>Car club contributions from developer to residents - two years’ free membership for all residents and £50 (fifty pounds in credit) per year for the first 2 years and an enhanced car club membership for the residents of the family-sized units (3+ bedrooms) including 3 years’ free membership and £100 (one hundred pounds in credit) per year for the first 3 years</p>		Pedestrian	Cycle	Vehicle	AM	169+8+8+17 = 202	18+1 = 19	7-1 = 6	PM	126-6+2+11 = 133	13+0 = 13	7-2 = 5	
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	<p>CPZ contributions to the extension of existing Controlled Parking Zones - £6,000 agreed with the applicant</p> <p>S.278 highway works agreement – exact scope to be defined upon obtaining S.278 highway works drawing from applicant before estimates can be undertaken by the Council – scope likely to cover the additional highway works necessary to accommodate the proposed Cross House development (including the proposed access to the basement car park, as well as relining and resigning works).</p> <p>Commercial Travel Plan (including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution)</p> <p><b>Planning Conditions</b></p> <p>Public highway condition Survey pre/post development works  Cycle parking details (28 long-stay and 4 short-stay spaces)  Detailed Construction Logistics Plan  Demolition/Construction Environmental Management Plans  Delivery and Servicing Plan  Car Parking Design and Management Plan (including the provision of electric vehicle charging points – both active and passive)  - Basement vehicular access control arrangements (or to be covered by the Car Parking Design and Management Plan only)</p>	
<b>Design</b>	<p><b><u>Principal of Development</u></b></p> <p>Thank you for asking me to comment on this application, with which I am familiar, having been part of their pre-app meeting and been heavily involved in the proposals, now under construction or complete, for the neighbouring sites at Smithfield Square (to the west of this application site, across Cross Lane), Smithfield Yard (adjoining this site to its north &amp; part east) &amp; Pool Motors (adjoining to the south &amp; remainder of east).</p> <p>The above remarks also reveal that this application site is at the centre of an area of recent and ongoing comprehensive redevelopment. This site is also at the centre of a site allocated in Haringey's Local Plan: Site Allocations DPD (adopted July 2017), SA47: Cross Lane, covering this site and those two neighbouring sites to the east side of Cross Lane, whilst the single larger development to the west side comprises the whole of the separate site allocation SA46: Hornsey Depot (that being a large part of it's former use).</p>	Comment noted

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	<p>SA46 is not relevant to this application, the realised development being the real site context to that side. But the site allocation that encompasses this site, SA47, is for:  <i>Redevelopment of industrial estate for employment led mixed use development with residential.</i></p> <p>The commentary notes that the <i>“site is a residual employment allocation within the Hornsey section of the old Haringey Heartland framework area. It is considered appropriate for new development which delivers new affordable employment use, with cross subsidisation from residential use”</i>. Requirements include <i>“no building needing to be retained subject to appropriate re-provision of affordable employment space”</i>, <i>“the site will be given a Local Employment Area: Regeneration Area status to reflect the mix of uses that already exist on it, and the Council’s aspiration to continue change in this area”</i>, <i>“should demonstrate that the maximum quantum of employment floorspace has been provided subject to viability...”</i>, and that any part of the site <i>“within the Hornsey Water Works &amp; Filter Beds Conservation Area and development should preserve or enhance its appearance as per the statutory requirements”</i>. Guidelines include that: <i>“development typologies should be responsive, and consistent with, those at New River Village and Hornsey Depot”</i>, that <i>“the site itself is very tight and should respond to the scale, massing and layout of the adjacent developments such as the New River village and Hornsey Depot”</i>, and that <i>“Scale should be such that it creates a transition between the various typologies of buildings within its immediate vicinity”</i>.</p> <p>A small part of the site is within the Hornsey Water Works and Filter Beds Conservation Area. This small projection of the south-western corner of the site currently contains just two parking spaces. It cannot be said to make a significant contribution to the character and appearance of the Conservation Area. The rest of the site is mostly filled by an existing brick-built, two storey industrial building. It is not considered to have any heritage significance, and provided the employment provision is at least re-provided in accordance with the site allocation conditions noted above, there is no objection to its demolition. However, it does contain some really striking decorative ceramic tiles around its entrance door, and it is to be hoped these can be saved for reuse somewhere.</p> <p>The site is therefore eminently suited to development, in principal, provided it is in accordance with the site allocation, employment designation and heritage context.</p> <p><b><u>Site Context</u></b>  Cross Lane, onto which the site faces along its western edge, slopes quite steeply up to the south. It levels off where it passes the southern edge of the Pool Motors site to the south,</p>	

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	<p>where its already relatively narrow width significantly narrows. Older existing buildings squeeze the street into barely a van's width where they face onto the historic Hornsey High Street; both Statutory Listed; no. 69 Hornsey High Street, to the east of Cross Lane, is a large 4 storey Georgian/early-Victorian house, with tall rear windows visible from the site looking across its large back garden that backs onto Pool Motors and flanks the southern end of Cross Lane. The Great Northern Railway Tavern Public House on the west side is later Victorian and more ornamental, as is the striking overhead sign spanning the entrance to Cross Lane from the pub to the front garden of no. 69, reading "Smithfridge Smithfield Refrigerator Works", redolent of the locality's manufacturing past.</p> <p>To the north, Cross Lane drops to a low point at the northern edge of the neighbouring Smithfield Square and Yard developments, where there is a crossroads with New River Avenue running east-west and Great Amwell Road continuing north. East of Great Amwell Lane , including either side of New River Avenue to the east, is another fairly recent development, the New River Village. Dating from the mid-noughties, this development was built on a large, un-needed part of the Hornsey Waterworks, and consists of predominantly white, rendered blocks, in sharp contrast to the brick based "New London Vernacular" architecture of Smithfield Square, Smithfield Yard, Pool Motors and this application. North-west of the crossroads, Campsbourne Well is a locally listed, monumental, Victorian, former water infrastructure, converted to residential as part of the Smithfield Square development, with mostly late 20<sup>th</sup> century low rise housing beyond.</p> <p>The wider context includes a vibrant local shopping centre on Hornsey High Street from the Great Northern Railway Tavern westwards, including a large Sainsbury's supermarket within Smithfield Square. The statutory listed church tower on the opposite side of Hornsey High Street forms a visible local landmark up the length of Cross Lane, and the cycle route through the church yard connects, via a pelican crossing, to Cross Lane, so they form part of a generally segregated, quiet, safe cycling route from Crouch End to Wood Green via the Penstock Tunnel under the East Coast Main Line railway, accessed east of the northern end of Great Amwell Lane. The large public recreation grounds, amenity spaces and nature conservation areas of Alexandra Park are just west of the northern end of Great Amwell Lane, with the monumental historic structure of Alexandra Palace prominently visible from many places in the locality. Hornsey Station is the nearest rail station, about 10 minutes' walk away, while Hornsey High Street provides busses including to Turnpike Lane tube station.</p>	

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	<p>The site is therefore eminently suited to be described as being within a “15 Minute City” with a wide range of services and amenities within a pleasant and easy walking distance of the site.</p> <p><b><u>Proposed Design</u></b></p> <p>This proposal takes close cues from its neighbouring developments. Its footprint picks up on the block of Smithfield Yard that it will directly abut, continuing that block’s front and rear building lines and plan depth, including ground floor front projection, before stepping back to instead align with the front and rear building lines and plan depth of the currently under-construction front block of the Pool Motors site development. Its overall height also matches its neighbours, the proposed height being mid-way between the slightly higher Smithfield Square and slightly lower Pool Motors.</p> <p>The two neighbouring sites are deeper, extending around the back, eastern edge of this application site to meet each other, and both are designed with a second, parallel block towards the eastern side of their plots, with a large communal landscaped courtyard, providing private communal amenity space to all residents of each respective development, between. The two blocks of Smithfield Yard are not quite parallel to each other but are approximately 24m apart, with the southern end of their rear block stepping back a couple of additional meters to accommodate a kink in the boundary between them and Pool Motors, whilst the two parallel blocks in the latter are 18m apart, generally regarded as the minimum acceptable distance to not create an overlooking concern. Therefore the fact that this proposal would always be more than 18m from either of the rear blocks of the two neighbouring developments demonstrates this proposal would not create any overlooking concern. It also maintains the parallel blocks development pattern, with private amenity space between. However, the amenity space in this application is not particularly large and would not create a meaningfully useful private communal amenity space for the proposed residential, as well as making circulation more convoluted, so it is designated as for the commercial uses.</p> <p>Like both neighbours, these proposals are for workspace on lower floors with residential above, but in this case a greater proportion of workspace is proposed, occupying three floors, compared to just the ground floor and half of the 1<sup>st</sup> floor in the Smithfield Yard case and only part of the ground floor in the Pool Motors case. This is commensurate with the balance of existing (or pre-existing) commercial space / quantum of employment on each plot, this application site having a comparatively large existing commercial floorspace. The increased amount of workspace in this application is to be welcomed from a land use policy and</p>	

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	<p>economic regeneration point of view, and is not bad thing from a design point of view, albeit not particularly significant. The proposed commercial floorspace in this application is convincingly designed and laid out, in fairly large, clear floorplates, with dedicated separate stair and lift access, parking and delivery space in the basement and a clear front door as part of a prominent “shop window” in the projecting ground floor frontage.</p> <p>The contribution to streetscape improvements of this modest development is appropriate for its size, and will continue the established plans, completed in neighbouring Smithfield Yard, for widening the pavement of Cross Lane, adding street trees and quality paving materials, and providing an active frontage to match the vision, in the site allocation and established in the neighbouring developments, that the street remain a vibrant working street but with much better clarity and quality. The projecting commercial frontage, housing a large shopfront window and main entrance door, is supported in the design and materials of the projection, with its tall parapet to the 1<sup>st</sup> floor roof terrace and white glazed bricks to every 4<sup>th</sup> course. The residential entrance is appropriately less prominent but none the less clear and inviting, whilst the neighbouring refuse stores are rationally located and appropriately functional and subservient.</p> <p>The detailed design, composition, fenestration, proportions and materials proposed promise to be appropriate, attractive and durable, with a brick based, regular, gridded composition of generously sized, vertically proportioned windows. Balconies are set in recesses and the vertical metal fins proposed for their balustrades should provide privacy to residents and hide their clutter in the generally sharply angled views of or from the street. The top floor is set back, again matching the form of its neighbours, and proposed to be in a light coloured glazed ceramic cladding that would be appropriately visually recessive and evocative of roofing materials and the sky. The main brick proposed is described as a “London Stock” but is not specified, and an attractive, variegated, buff brick with red and brown elements should be sought when it, like all other materials, are subject to discharge of condition.</p> <p>Residential standards are all fine, with flat, room and external private amenity sizes, as is to be routinely expected, meeting statutory &amp; policy requirements, in some cases exceeding. No private communal amenity space or playspace is provided, but this is to be expected, as is a small development of less than ten flats. There are public amenity spaces within the locality, including the Hornsey Churchyard, newly landscaped high quality public spaces within Smithfield Square and New River Village and not much further away the large recreation, landscape and wildlife area of Alexandra Park. As they are all on upper floors (3<sup>rd</sup> floor and above), they will all receive good daylight, sunlight and privacy, and the applicants have</p>	

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	<p>shown that the proposal will only cause very modest loss of daylight to less important windows within neighbouring properties. Views have been prepared to show it will not be visible from sensitive locations within neighbouring conservation areas.</p> <p>In conclusion, this proposal for this modest site, the last site in the Hornsey Waterworks, Hornsey Depot and Cross Lane development opportunity, is elegantly and appropriately designed to be compatible with previous neighbouring developments and be the last little piece that completes the transformation of this neighbourhood from ugliness and dereliction to a vibrant mixed community, providing modern employment and an attractive bit of cityscape amongst a large number of new, high quality homes.</p>	
<p><b>Lead Pollution</b></p>	<p><b>1. Land Contamination</b></p> <p>Before development commences other than for investigative work:</p> <p>a. Using the information already submitted on Phase I Desk Study Report with reference GWPR4029/DS/Feb 2021 prepared by Ground and Water Limited dated February 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.</p> <p>b. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.</p> <p>c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and;</p> <p>d. A report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.</p> <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p><b>2. Unexpected Contamination</b></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</p>	<p>Comments noted. Conditions included</p>

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	<p>will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved. Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework</p> <p style="text-align: center;"><b>3. NRMM</b></p> <p>a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <a href="http://nrmm.london/">http://nrmm.london/</a>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.</p> <p>b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ</p> <p style="text-align: center;"><b>Demolition/Construction Environmental Management Plans</b></p> <p>a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst</p> <p>b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.</p> <p style="text-align: center;">The following applies to both Parts a and b above:</p>	

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	<p>a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).</p> <p>b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:</p> <ul style="list-style-type: none"> <li>i. A construction method statement which identifies the stages and details how works will be undertaken;</li> <li>ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;</li> <li>iii. Details of plant and machinery to be used during demolition/construction works;</li> <li>iv. Details of an Unexploded Ordnance Survey;</li> <li>v. Details of the waste management strategy;</li> <li>vi. Details of community engagement arrangements;</li> <li>vii. Details of any acoustic hoarding;</li> <li>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</li> <li>ix. Details of external lighting; and</li> <li>x. Details of any other standard environmental management and control measures to be implemented.</li> </ul> <p>c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:</p> <ul style="list-style-type: none"> <li>i. Monitoring and joint working arrangements, where appropriate;</li> <li>ii. Site access and car parking arrangements;</li> <li>iii. Delivery booking systems;</li> <li>iv. Agreed routes to/from the Plot;</li> <li>v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and</li> <li>vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and</li> <li>vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.</li> </ul> <p>d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:</p> <p>Mitigation measures to manage and minimise demolition/construction dust emissions during works;</p> <ul style="list-style-type: none"> <li>ii. Details confirming the Plot has been registered at <a href="http://nrmm.london;">http://nrmm.london;</a></li> </ul>	

Stakeholder	Question/Comment	Response
	<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); 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. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.</p> <p>Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.”</p> <p><b>Informative:</b></p> <p>1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
<p><b>Waste Management Team</b></p>	<p>Officers comments dated 14 January 2022</p> <p>Having looked at the documents supplied with this application, the previous comments from the waste team and the response from the developer to these, I am satisfied that points that needed clarification – pull distance, gradient, drop kerb – have been acknowledged and worked into the plans for the development. The bin numbers, sizing and waste stream split are all correct for the number of residential units here. Collections will take place from Cross Street with suitable space for an RCV to carry these out.</p> <p>I may have missed this but couldn't see reference to how the domestic bin store would be secured. I would advise that access is given to residents only by preferably a fob/digilock rather than a key. This will help to reduce issues such as misuse of bins, fly tipping/other ASB. Fobs/codes will need to be shared with LBH prior to occupation.</p> <p>The commercial bin store isn't mentioned here but from the plans is shown as separate from the residential bins as is required. Sizing/number of bins will very much depend on the type of businesses that occupy the space in operation, the waste/recycling they generate and the contracts they put in place for the collection of this. Commercial waste collection companies</p>	<p>Comments noted</p>

Stakeholder	Question/Comment	Response
	<p>can provide up to twice daily collections 7 days per week. I would however advise against sizing the bins store based on minimum size and maximum collections. The store should be sufficient to store waste for one week.</p> <p>Officers comments dated 13 February 2023</p> <p>It is positive that the fobs will be used to secure access to the domestic bin store and to also get some clarity on the commercial bin store and metrics used to calculated bin capacity needed.</p> <p>I am satisfied with this response</p>	
<b>Building Control</b>	<p>Whilst this BiA does not follow the normal format, it does have sufficient information within it to meet your requirements, I would however add 2 pre commencement conditions:</p> <ol style="list-style-type: none"> <li>1. Method of monitoring adjacent properties for potential movement during the build;</li> <li>2. Construction Management Plan to be provided.</li> </ol>	<p>Comments noted. Conditions included</p>
<b>Building Control</b>	<p>The fire safety statement (Issue 1) for the proposed development appears satisfactory. The report does not however discuss the ventilation strategy and means of escape for the enclosed car park at lower ground/basement level in accordance with Approved Document B. The proposal/scheme will be subject to a full check under the Building Regulations 2010 when the application is submitted to Building Control or through the Gateway 2 process.</p>	<p>Comments noted</p>
<b>Arboricultural Officer</b>	<p>From an arboricultural point of view, I am satisfied and have no concerns. We will require a master Landscape Plan.</p>	<p>Comments noted. Conditions included</p>
<b>Flood &amp; Water Management Lead</b>	<p>Officers comments dated 30 July 2021</p> <p>The LLFA, has reviewed application HGY/2021/1909 – Demolition of existing building, redevelopment to provide business (Class E (g) (iii)) use of the ground, first and second floors, residential (Class C3) use on the upper floors, within a building of six storeys for basement, provision of 7 car parking spaces and refuse storage.</p> <p>The site offers little in the way of above ground SuDS, the applicant has followed the SuDS, hierarchy and has included, green roofs, permeable paving, attenuation tank to store rain water before being discharged to the public sewer at a restricted rate of 1 l/s.</p>	<p>Comments noted</p>

Stakeholder	Question/Comment	Response																					
	<p>A management maintenance plan has been provided to manage the SuDS, this must be for the lifetime of the proposed development and will be maintained by a management company in accordance with the schedule.</p> <p>We have attached the Haringey, pro-forma, that will need to be completed and returned to us for review. The proforma has two parts, the first page has information and links that can be referenced, the second page is the part that needs to be completed and returned</p> <p>Officer comments dated 29 September 2021</p> <p>Having reviewed previous comment and attached completed Pro-forma we are content with the same and have no further observations.</p>																						
<p><b>Carbon Team</b></p>	<p><b>Carbon Management Response 20/02/2022</b></p> <p>In preparing this consultation response, we have reviewed:  Letter in response to above comments by Ensphere, dated 2 February 2022  Sustainability and Energy Statement prepared by Ensphere Group Ltd (dated January 2022, v5)  Amended plans: Proposed roof plan, elevations (front, south, rear), sections (CC, DD, EE)  Roof plan housing screen image  Relevant supporting documents.</p> <p><b>Summary</b>  The applicant has made changes to the scheme to achieve a higher on-site carbon reduction. A 45.5% site-wide reduction is now achieved, with higher fabric efficiencies and a small solar PV array. This now meets London Plan Policy SI2 and Local Plan Policy SP4.</p> <p>Further information needs to be provided in relation to the Energy Strategy. This should be addressed prior to the determination of the application before appropriate planning conditions can be drafted.</p> <p><b>Energy</b></p> <table border="1" data-bbox="506 1299 1547 1393"> <thead> <tr> <th data-bbox="506 1299 777 1331"></th> <th colspan="2" data-bbox="777 1299 909 1331">Residential</th> <th colspan="2" data-bbox="909 1299 1153 1331">Non-residential</th> <th colspan="2" data-bbox="1153 1299 1547 1331">Site-wide</th> </tr> <tr> <th data-bbox="506 1331 777 1393"><i>(SAP10 emission factors)</i></th> <th data-bbox="777 1331 909 1362">tCO<sub>2</sub></th> <th data-bbox="909 1331 1019 1362">%</th> <th data-bbox="1019 1331 1153 1362">tCO<sub>2</sub></th> <th data-bbox="1153 1331 1285 1362">%</th> <th data-bbox="1285 1331 1417 1362">tCO<sub>2</sub></th> <th data-bbox="1417 1331 1547 1362">%</th> </tr> </thead> <tbody> <tr> <td data-bbox="506 1362 777 1393"></td> <td data-bbox="777 1362 909 1393"></td> <td data-bbox="909 1362 1019 1393"></td> <td data-bbox="1019 1362 1153 1393"></td> <td data-bbox="1153 1362 1285 1393"></td> <td data-bbox="1285 1362 1417 1393"></td> <td data-bbox="1417 1362 1547 1393"></td> </tr> </tbody> </table>		Residential		Non-residential		Site-wide		<i>(SAP10 emission factors)</i>	tCO <sub>2</sub>	%	tCO <sub>2</sub>	%	tCO <sub>2</sub>	%								<p>Comments noted.  Conditions and legal agreement  Clauses included</p>
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Stakeholder	Question/Comment						Response
	<b>Baseline emissions</b>	9.2		14.3		23.5	
	<b>Be Lean savings</b>	1.6	17%	3.3	23%	4.9	20.9%
	<b>Be Clean savings</b>	0	0%	-1.5	-10%	-1.5	-6.4%
	<b>Be Green savings</b>	2.8	31%	4.5	32%	7.3	30.1%
	<b>Cumulative savings</b>	4.4	48%	6.3	44%	10.7	45.5%
	<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	4.8		8		12.8	
	<b>Carbon offset contribution (incl. 10% management fee)</b>	£95 x 30 years x 12.8 tCO <sub>2</sub> /year = £36,480 + £3,648 = £40,128					
	A revised carbon offset contribution of £36,480 + a 10% management fee has been calculated above.						
<b>Energy – Be Lean</b>							
The development now achieves a 13% (residential) and 20% improvement under Be Lean with SAP2012 carbon factors, which goes beyond the minimum London Plan requirements.							
The average heating requirement is 5.9 kWh/m <sup>2</sup> /year – it seems likely that this is a typographical error as the example SAP sheets given come to a 12.5 kWh/m <sup>2</sup> /year space heating requirement.							
The FEES have achieved an improvement of 35-40%.							
<u>Action:</u>							
The report notes no changes to the air permeability whereas the SAP sheets show an improvement from 5 to 3m <sup>3</sup> /hm <sup>2</sup> @50Pa, please correct. It also does not mention the inclusion of MVHR now (79% efficiency), or the lowering of g-value from 0.65 to 0.5.							
The improvements under Be Lean are significant, without explaining within the report how this could be achieved. Please clarify.							
SAP sheets now have no infiltration instead of 0.14 ach in previous version, please explain. Please submit p.5 of the Be Lean SAP sheet.							
<b>Energy – Be Clean</b>							

Stakeholder	Question/Comment	Response
	<p><u>Action:</u> Please clarify why there is an increase in emissions under Be Clean for the non-residential element?</p> <p><b>Energy – Be Green</b> A small solar PV array is now proposed for the landlord supply. This covers a small proportion of the roof only.</p> <p>The air source heat pumps (SCOP &gt;4) are now supplying residential space heating as well, which would likely require centralised condensers with small cylinders in flats. The ASHP would be located on part of the roof.</p> <p><u>Action:</u> What is the proposed solar PV capacity and annual electricity generation? The solar PV array can be combined with the living roof to deliver a higher solar PV capacity. Please explain the differences in the SAP sheets under Be Green for lower higher fuel required for water heating.</p> <p><b>Overheating</b> The applicant has proposed to condition the required additional overheating modelling. Conditions will be proposed once the above information has been provided.</p> <p><b>Sustainability – BREEAM</b> A BREEAM Pre-Assessment has been prepared and appended to the Energy Statement. It indicates that a score of 57.6% could be achieved, equivalent to a 'Very Good' rating. A BREEAM accreditation should be achieved prior to the occupation of this unit.</p> <p><b>Planning Conditions</b> To be secured (with detailed wording TBC): Energy strategy Overheating (residential and non-residential) BREEAM Certificate Living roofs Biodiversity</p> <p><b>Planning Obligations Heads of Terms</b></p>	

Stakeholder	Question/Comment	Response																																																															
	<p>Be Seen commitment to uploading energy data Energy Plan and Sustainability Review Carbon offset contribution (and associated obligations) of £36,480 (indicative), plus a 10% management fee</p> <p><b>Carbon Management Response 16/02/2023</b></p> <p>In preparing this consultation response, we have reviewed: Letter prepared by Ensphere Group Ltd (dated 5 April 2022) Sustainability &amp; Energy Statement prepared by Ensphere Group Ltd (dated April 2022, v8) GLA carbon emission reporting spreadsheet Email from applicant on 25 April 2022</p> <p><b>Summary</b> Further clarifications were requested of the applicant via email in April 2022, on the Be Lean inputs, GLA reporting spreadsheet, heating strategy, the solar PV capacity and overheating responses. The applicant responded via email.</p> <p>The applicant's letter confirms their position on the air permeability, MVHR and g-value and clarifies inconsistencies. The revised Sustainability &amp; Energy Statement clarifies this. The heating strategy is for ASHPs to provide both hot water and space heating.</p> <p><b>Energy - Overall</b></p> <table border="1" data-bbox="506 1011 1473 1394"> <thead> <tr> <th></th> <th colspan="2">Residential</th> <th colspan="2">Non-residential</th> <th colspan="2">Site-wide</th> </tr> <tr> <th>(SAP10 emission factors)</th> <th>tCO<sub>2</sub></th> <th>%</th> <th>tCO<sub>2</sub></th> <th>%</th> <th>tCO<sub>2</sub></th> <th>%</th> </tr> </thead> <tbody> <tr> <td><b>Baseline emissions</b></td> <td>9.2</td> <td></td> <td>14.3</td> <td></td> <td>23.5</td> <td></td> </tr> <tr> <td><b>Be Lean savings</b></td> <td>1.6</td> <td>17%</td> <td>3.3</td> <td>23%</td> <td>4.8</td> <td>20%</td> </tr> <tr> <td><b>Be Clean savings</b></td> <td>0</td> <td>0%</td> <td>0</td> <td>0%</td> <td>0</td> <td>0%</td> </tr> <tr> <td><b>Be Green savings</b></td> <td>2.8</td> <td>31%</td> <td>3.1</td> <td>21%</td> <td>5.9</td> <td>25%</td> </tr> <tr> <td><b>Cumulative savings</b></td> <td>4.4</td> <td>48%</td> <td>6.3</td> <td>44%</td> <td>10.7</td> <td>46%</td> </tr> <tr> <td><b>Carbon shortfall to offset (tCO<sub>2</sub>)</b></td> <td colspan="2">4.8</td> <td colspan="2">8</td> <td colspan="2">12.8</td> </tr> <tr> <td><b>Carbon offset contribution</b></td> <td colspan="6">£95 x 30 years x 12.8 tCO<sub>2</sub>/year = <b>£36,480</b></td> </tr> </tbody> </table>		Residential		Non-residential		Site-wide		(SAP10 emission factors)	tCO <sub>2</sub>	%	tCO <sub>2</sub>	%	tCO <sub>2</sub>	%	<b>Baseline emissions</b>	9.2		14.3		23.5		<b>Be Lean savings</b>	1.6	17%	3.3	23%	4.8	20%	<b>Be Clean savings</b>	0	0%	0	0%	0	0%	<b>Be Green savings</b>	2.8	31%	3.1	21%	5.9	25%	<b>Cumulative savings</b>	4.4	48%	6.3	44%	10.7	46%	<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	4.8		8		12.8		<b>Carbon offset contribution</b>	£95 x 30 years x 12.8 tCO <sub>2</sub> /year = <b>£36,480</b>						
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<b>10% management fee</b>	+ £3,648 = £40,128 (total)			

Stakeholder	Question/Comment	Response
	<p><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); A metering strategy.</i></p> <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) The solar PV arrays must be installed and brought into use prior to first occupation of the development. Six months following the first occupation, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, and an energy generation statement for the period that the solar PV array has been installed.</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><i>Be Seen</i></u>  <i>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><i>Overheating (Residential)</i></u>  <i>Prior to the commencement of development, a dynamic thermal overheating model and report shall be submitted to and approved by the Local Planning Authority for the commercial floor area. 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 risks have been mitigated and removed through design solutions. These mitigation measures shall be operational prior to the first</i></p>	

Stakeholder	Question/Comment	Response
	<p><i>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>This report will include:</i></p> <p><i>Details of the design measures incorporated within the scheme (including the feasibility of prioritising passive cooling and ventilation measures) to ensure adaptation to higher temperatures are addressed, the spaces do not overheat, and the use of active cooling is avoided.</i></p> <p><i>How any pipework heat losses are minimised.</i></p> <p><i>Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.</i></p> <p><i>Specification of the internal blinds, and evidence that these will not impede the opening of windows.</i></p> <p><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></p> <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><i>Overheating (Non-Residential)</i></u></p> <p><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 TM52 (using the London Weather Centre TM49 weather DSY1-3 files for the 2020s, and DSY1 for the 2050s and 2080s) and demonstrate how the 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>This report will include:</i></p>	

Stakeholder	Question/Comment	Response
	<p><i>Details of the design measures incorporated within the scheme (including details of the feasibility of prioritising passive cooling and ventilation measures) to ensure adaptation to higher temperatures are addressed, the spaces do not overheat, and the use of active cooling is avoided.</i></p> <p><i>Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.</i></p> <p><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></p> <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><i>Living roofs</i></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"> <li><i>i) A roof plan identifying where the living roofs will be located;</i></li> <li><i>ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm);</i></li> <li><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></li> <li><i>iii) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m<sup>2</sup> of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m<sup>2</sup>, rope coils, pebble mounds of water trays;</i></li> <li><i>iv) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m<sup>2</sup>) and density of plug plants planted (minimum 20/m<sup>2</sup> with roof ball of plugs 25m<sup>3</sup>) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the</i></li> </ul>	

Stakeholder	Question/Comment	Response
	<p><i>different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);</i></p> <p><i>v) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</i></p> <p><i>vi) Management and maintenance plan, including frequency of watering arrangements.</i></p> <p><i>(b) Prior to the occupation of 90% of the dwellings, evidence must be submitted to and approved by the Local Planning Authority that the living 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 roof has 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. 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><i>Biodiversity</i></u></p> <p><i>(a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.</i></p> <p><i>(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.</i></p> <p><i>Development shall accord with the details as approved and retained for the lifetime of the development.</i></p>	

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	<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> <p><b><u>BREEAM</u></b></p> <p><i>(a) Prior to commencement on site, a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”.</i></p> <p><i>The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.</i></p> <p><i>(b) At least six months prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.</i></p> <p><i>In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority’s approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</i></p> <p><i>Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.</i></p>	
<p><b>Conservation Officer</b></p>	<p>The development site adjoins the boundary of Hornsey Water Works &amp; Filter Beds, and it is currently occupied by a modest yet stark, two storey red brick building that covers the entire site and provides an opportunity for redevelopment and enhancement of the site consistently with the emerging scale, height, and typology of the surrounding sites. The character and appearance of the adjacent section of Hornsey Water Works &amp; Filter Beds conservation area has been recently changing</p>	<p>Comments noted.</p>

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	<p>into contemporary, mixed used developments that can be positively complemented by a well-designed new building of similar type and height. The emerging developments surrounding the development site, importantly form part of the setting of the well-preserved, listed street frontage of the eastern stretch of Hornsey High Street Conservation Area, which is contiguous to the Hornsey Water Works &amp; Filter Beds Conservation Area.</p> <p>Approved new developments have been designed to preserve the significance of listed building and conservation area frontage as experienced in views across and outside of the Hornsey High Street Conservation Area, especially views from St Mary's Tower gardens and from the village green along the High Street.</p> <p>The proposed mixed use, six storey development plus basement will be nested in between recent developments of similar height and façade proportions fronting Cross Lane and this new scheme will harmoniously complement the architectural language and façade design of these neighbouring buildings thus raising and strengthening the architectural and urban quality of the street frontage along Cross Lane, which is in the setting of both Conservation Areas and related listed buildings respectively located at Nos 67, 69 and 71 Hornsey High Street. The architectural and townscape merits of the proposed development are fully articulated in the design officer's comments that confirm the soundly context-led design approach underpinning this sensitively designed development proposal.</p> <p>Due to its relative, densely built distance from the sensitive street frontage of the Hornsey High Street Conservation Area and the down sloping topography of Cross Lane from the High Street towards the development site, but also due to its carefully thought-through proportions and height, the proposed development is screened in views of the Conservation Areas and most importantly, of the listed Hornsey High Street frontage and the heritage visual impact of the scheme has been tested through the submitted views that illustrate that the new development will not be visible in the background of the listed buildings and Conservation Area frontage along Hornsey High Road and while it will cause no harm to the significance of the listed building and conservation areas, this scheme will contribute to enhance the quality of the Cross Lane area, and therefore setting of</p>	

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	heritage assets, and it is therefore fully supported from the conservation perspective.	
<b>EXTERNAL</b>		
<b>Thames Water</b>	<p>Waste Comments 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://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices">https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices</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 accordance with the terms of the approved piling method statement." Reason: The proposed</p>	Comments noted. Conditions/ Informative included

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	<p>works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.<a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes</a>. Should you require further information please contact Thames Water. Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a> Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p>As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. 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 will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 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>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>Water Comments If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at <a href="http://thameswater.co.uk/buildingwater">thameswater.co.uk/buildingwater</a>.</p> <p>The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting</p>	

Stakeholder	Question/Comment	Response
	<p>activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at <a href="https://www.gov.uk/government/publications/groundwater-protection-positionstatements">https://www.gov.uk/government/publications/groundwater-protection-positionstatements</a>) and may wish to discuss the implication for their development with a suitably qualified environmental consultant.</p> <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.</p>	
<p><b>Secure By Design</b></p>	<p>Section 1 - Introduction:</p> <p>With reference the above application we have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>We have met with the project Architects to discuss Crime Prevention and Secured by Design (SBD) for the overall site, the Architects have provided notes of the meeting which have been included in the recommendations below in the informative. At this point it can be difficult to design out any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.</p>	<p>Comments noted. Conditions/ Informative included</p>

Stakeholder	Question/Comment	Response
	<p>Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can be easily mitigated early if the Architects or Managing Agency were to discuss this project prior to commencement, throughout its build and by following the advice given. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p>Section 2 - Secured by Design Conditions and Informative:</p> <p>In light of the information provided, we request the following Conditions and Informative: Conditions:</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. 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 use, 'Secured by Design' certification shall be obtained for such building or part of such building or use and thereafter all features are to be retained.</p> <p>C. Commercial aspects of the development must achieve the relevant Secured by Design Accreditation at the final fitting stage, prior to residential occupation of such building in accordance with condition B (Secured by Design) and commencement of business. Details shall be submitted to and approved, in writing, by the Local Planning Authority</p> <p>Section 3 - Conclusion:</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>	
<b>Environment Agency</b>		

Stakeholder	Question/Comment	Response
	<p>The proposed development will be acceptable if the following 7 planning conditions are included on the planning permission's decision notice. Without these conditions, the development would pose an unacceptable risk to groundwater and we would object.</p> <p><b>EA Condition 1 – Land Affected By Contamination</b>  No development approved by this planning permission shall take place until a remediation strategy that includes the following components to deal with the risks associated with contamination of the site shall be submitted to and approved, in writing, by the local planning authority:</p> <ol style="list-style-type: none"> <li>1. A preliminary risk assessment which has identified: <ul style="list-style-type: none"> <li>• all previous uses</li> <li>• potential contaminants associated with those uses</li> <li>• a conceptual model of the site indicating sources, pathways and receptors</li> <li>• potentially unacceptable risks arising from contamination at the site.</li> </ul> </li> <li>2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.</li> <li>3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.</li> <li>4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.</li> </ol> <p>Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.</p> <p>Cont/d..</p> <div style="text-align: right;">   </div>	<p>Comments noted.  Conditions included</p>

Stakeholder	Question/Comment	Response
	<p><b>Reason 1</b>  The proposed development presents a high risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located within a Source Protection Zone 1. This condition will ensure that the development does not contribute to, or is not put at unacceptable risk from/adversely affected by levels of water pollution in line with paragraph 174 of the National Planning Policy Framework.</p> <p><b>EA Condition 2 – Verification Report</b>  No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.</p> <p><b>Reason 2</b>  To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 174 of the National Planning Policy Framework.</p> <p><b>EA Condition 3 - Long Term Monitoring and Maintenance Plan for Groundwater</b>  No development should take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local Planning Authority, shall be submitted to and approved in writing by the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that all long-term remediation works have been carried out and confirming that remedial targets have been achieved shall be submitted to and approved in writing by the Local Planning Authority.</p> <p><b>Reason 3</b>  To ensure that the site does not pose any further risk to human health or the water environment by managing any ongoing contamination issues and completing all necessary long-term remediation measures. This is in line with paragraph 174 of the National Planning Policy Framework.</p>	

Stakeholder	Question/Comment	Response
	<p><b>EA Condition 4 – Unidentified Contamination</b>            If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.</p> <p><b>Reason 4</b>            No investigation can completely characterise a site. This condition ensures that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 174 of the</p> <p>Cont/d.. 2</p>	

Stakeholder	Question/Comment	Response
	<p>National Planning Policy Framework.</p> <p><b>EA Condition 5 – Borehole Management</b>  A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of any part of the permitted development.</p> <p><b>Reason 5</b>  To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 174 of the National Planning Policy Framework and Position Statement N Groundwater resources of 'The Environment Agency's approach to groundwater protection'.</p> <p><b>EA Condition 6 – Piling / Foundation works Risk Assessment with Respect to Groundwater Resources</b>  Piling, deep foundations and other intrusive groundworks using penetrative measures shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.</p> <p><b>Reason 6</b>  To ensure that any proposed piling, deep foundations and other intrusive groundworks do not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework and Position Statement N. Groundwater Resources of the <a href="#">The Environment Agency's approach to groundwater protection</a>'.</p> <p><b>EA Condition 7 – Infiltration of Surface Water onto the Ground</b>  No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the local planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.</p> <p><b>Reason 7</b>  To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 174 of the National Planning Policy Framework.</p> <p><b>Advice to LPA</b></p>	

Stakeholder	Question/Comment	Response
	<p><b>Use of Sustainable Drainage Systems (SuDS)</b>  Support for the use of SuDS to ensure development does not increase flood risk elsewhere is set out in paragraph 167 of the National Planning Policy Framework.</p> <p>Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. Ponds, reedbeds and seasonally flooded grasslands can also be particularly attractive features within public open spaces.</p> <p>Cont/d.. 3</p> <hr/> <p>SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. As such, virtually any development should be able to include a scheme based around these principles. In doing so, they'll provide multiple benefits and will reduce costs and maintenance needs.</p> <p>Further information on SuDS can be found in:</p> <ul style="list-style-type: none"> <li>• the CIRIA C697 document SuDS manual</li> <li>• HR Wallingford SR 666 Use of SuDS in high density developments</li> <li>• CIRIA C635 Designing for exceedance in urban drainage – good practice</li> <li>• the Interim Code of Practice for Sustainable Drainage Systems – the Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS</li> </ul> <p><b>Competent persons</b>  The proposed development will be acceptable if the planning conditions included which require the submission of a remediation strategy are carried out by a competent person in line with paragraph 183 of the NPPF. The Planning Practice Guidance defines a "Competent Person (to prepare site investigation information): A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation" (<a href="http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/annex-2-glossary/">http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/annex-2-glossary/</a>).</p> <p><b>Advice to applicant</b></p>	

Stakeholder	Question/Comment	Response
	<p><b>Piling</b>  For piling (or other deep penetrative) works, where the piles (or other deep structures) extend into aquifer units within SPZ1, a foundation works risk assessment and groundwater monitoring programme will be required due to nearby potable groundwater abstractions.</p> <p>The foundation risk assessment should consider potential risks to groundwater resources that could arise as a result of deep piling works. The groundwater monitoring programme should be designed to collect information prior to and during the works to demonstrate that any piling (or other deep penetrative) works are not having an adverse impact on groundwater quality in the area. The piling risk assessment and groundwater monitoring plan should provide a mitigation / action plan should an adverse impacts to groundwater quality be noted during the works.</p> <p>Within SPZ1, due to the close proximity of potable abstractions, we recommend that real-time monitoring for in-situ groundwater quality parameters, including conductivity and turbidity, should be incorporated into the groundwater monitoring plan as this can provide valuable on site data and enable rapid decision making with respect to mitigations if required.</p> <p>A brief introduction to the potential hazards associated with piling through contaminated soils can be found:</p> <p><a href="http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/scho0202bisw-e-e.pdf">http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/scho0202bisw-e-e.pdf</a>.</p> <p>Monitoring wells installed to support a piling risk assessment should be installed to at least 5m deeper than the deepest piled foundation to capture any impacts from the</p> <p>Cont/d..</p> <p style="text-align: center;">4</p>	

Stakeholder	Question/Comment	Response
	<p>proposed groundworks during and post construction.</p> <p><b>Land affected by contamination</b> We recommend that developers should:</p> <p>Follow the risk management framework provided in <a href="#">Land Contamination: Risk Management</a> (formerly CLR11), when dealing with land affected by contamination. This guidance is available at: <a href="https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks">https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks</a></p> <p>Refer to the <a href="#">Environment Agency Guiding principles</a> (<a href="https://www.gov.uk/government/collections/land-contamination-technical-guidance">https://www.gov.uk/government/collections/land-contamination-technical-guidance</a>) for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health. Consider using the <a href="#">National Quality Mark Scheme for Land Contamination Management</a> (<a href="https://www.claire.co.uk/projects-and-initiatives/ngms">https://www.claire.co.uk/projects-and-initiatives/ngms</a>) which involves the use of competent persons to ensure that land contamination risks are appropriately managed.</p> <p>Refer to the <a href="#">contaminated land</a> pages on gov.uk for more information. We expect the site investigations to be carried out in accordance with best practice guidance for site investigations on land affected by land contamination. E.g. British Standards when investigating potentially contaminated sites and groundwater, and references with these documents:</p> <ul style="list-style-type: none"> <li>• BS5930:2015 Code of practice for site investigations;</li> <li>• BS 10175:2011 A1:2013 Code of practice for investigation of potentially contaminated sites;</li> <li>• BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points;</li> <li>• BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns and groundwater quality.)</li> </ul> <p>Previous use of the site as a commercial garage, as well as presence of tanks, presents a high risk of contamination on site. Should further site investigation and a generic risk assessment conclude that a Detailed Quantitative Risk Assessment (DQRA) be undertaken please consider the following:</p> <ul style="list-style-type: none"> <li>• Use MCERTS accredited methods for testing contaminated soils at the site</li> </ul>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>• The DQRA report should be prepared by a “Competent person” (e.g. a suitably qualified hydrogeologist). The DQRA should be based on site-specific data, however in the absence of any applicable on-site data, a range of values should be used to calculate the sensitivity of the input parameter on the outcome of the risk assessment.</li> <li>• Where groundwater has been impacted by contamination on site, the default compliance point for both Principal and Secondary aquifers is 50m. Further guidance is available at <a href="https://www.gov.uk/guidance/land-contamination-groundwater-compliance-points-quantitative-risk-assessments">https://www.gov.uk/guidance/land-contamination-groundwater-compliance-points-quantitative-risk-assessments</a></li> <li>• Where leaching tests are used it is strongly recommended that BS ISO 18772:2008 is followed as a logical process to aid the selection and justification of appropriate tests based on a conceptual understanding of soil and contaminant properties, likely and worst-case exposure conditions, leaching mechanisms, and study objectives. During risk assessment one should characterise the leaching behaviour of contaminated soils using an appropriate</li> </ul> <p>Cont/d.. 5</p>	

Stakeholder	Question/Comment	Response
	<p>suite of tests. As a minimum these tests should be:</p> <ul style="list-style-type: none"> <li>o upflow percolation column test, run to LS 2 – to derive kappa values;</li> <li>o pH dependence test if pH shifts are realistically predicted with regard to soil properties and exposure scenario; and</li> <li>o LS 2 batch test – to benchmark results of a simple compliance test against the final step of the column test.</li> </ul> <ul style="list-style-type: none"> <li>• Following the DQRA, a Remediation Options Appraisal to determine the Remediation Strategy in accordance with the <a href="#">Land Contamination: Risk Management</a> guidance.</li> </ul> <p>Any remediation strategy must be carried out by a competent person, in line with paragraph 178 of the National Planning Policy Framework. The National Planning Policy Framework defines a "Competent Person (to prepare site investigation): A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation".</p> <p><b>Groundwater monitoring</b> Proposals for a groundwater monitoring programme should encompass regular monitoring for a period before, during and after groundworks (e.g. monthly monitoring before, during and for at least the first quarter after completion of groundworks, followed by quarterly monitoring for the remaining 9 months). These proposals should be included in the verification plan.</p> <p><b>Waste off-site</b> Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:</p> <ul style="list-style-type: none"> <li>• Duty of Care Regulations 1991</li> <li>• Hazardous Waste (England and Wales) Regulations 2005</li> <li>• Environmental Permitting (England and Wales) Regulations 2010</li> <li>• The Waste (England and Wales) Regulations 2011</li> </ul> <p>Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.</p> <p>If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12 month period the developer will need to register with us as a hazardous waste producer. Refer to the <a href="#">waste management</a> page on gov.uk for more information.</p> <p><b>Material Re-use on-site</b> The CL:AIRE Definition of Waste: Development Industry Code of Practice (Version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste. Under the Code of Practice:</p> <ul style="list-style-type: none"> <li>• excavated materials that are recovered via a treatment operation can be re-used on-site provided they are treated to a standard such that they fit for purpose and unlikely to cause pollution</li> <li>• treated materials can be transferred between sites as part of a hub and cluster project</li> <li>• some naturally occurring clean material can be transferred directly between sites</li> </ul> <p>Cont/d..</p>	

Stakeholder	Question/Comment	Response
	<p>Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.</p> <p>We recommend that developers should refer to:</p> <ul style="list-style-type: none"> <li>• The <a href="#">position statement</a> on the Definition of Waste: Development Industry Code of Practice</li> <li>• The <a href="#">waste management</a> page on gov.uk</li> </ul> <p><b>Water Resources</b> 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 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 developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within <a href="#">the Building Regulations &amp;c. (Amendment) Regulations 2015</a>.</p> <p>However, we recommend that in areas of serious water stress (as identified in our report <a href="#">Water stressed areas - final classification</a>) 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> <p>We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.</p> <p>We also recommend you contact your local planning authority for more information.</p> <p><b>Final comments</b> Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the</p>	
<p><b>Transport for London</b></p>	<p>Having assessed the proposals, I can confirm that TfL Spatial Planning has no strategic comments to make on this planning application other than to emphasise the development should comply with the transport policies set out in The London Plan 2021. In particular the car and cycle parking standards in tables 10.2 - 10.6 (inclusive). Cycle parking should comply with the London Cycling Design Standards (<a href="https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit">https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit</a>).</p>	<p>Comments noted</p>

Stakeholder	Question/Comment	Response
London Fire Brigade	<p>The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The in London.</p> <p>The Commissioner has been consulted with regard to the above-mentioned premises and makes following observations:</p> <p>The Commissioner is satisfied with the proposals for firefighting access.</p>	<p>Comments noted. Informative included</p>
<b>NEIGHBOURING PROPERTIES</b>	<p><b>Land Use and housing</b> Concerns the commercial unit will remain vacant like the existing neighbouring units Excessive commercial use proposed More housing developments are not needed in the area</p> <p><b>Impact on Heritage assets</b> An appraisal of the Conservation Area should be carried out before a decision is made Impact on the Conservation Area Impact on the setting of the listed building</p> <p><b>Size, Scale and Design</b></p> <p>The development will enhance the street Excessive height The height should not exceed the existing Smithfield Yard development Overdevelopment of site Concerns with the density of the development The design is not in keeping with surrounding properties The scheme should be redesigned</p>	<p>The site allocation for the site requires provision of commercial space and the provision would deliver the aims of the site allocation. Delivery of housing is essential to meeting Local Plan Housing targets.</p> <p>The Council's Conservation Officer has reviewed the proposal and found there to be no harm to the existing heritage assets in the area.</p> <p>Noted. The height reflects the heights of surrounding developments. The density is in line with neighbouring developments.</p>

Stakeholder	Question/Comment	Response
	<p>The development is significantly larger in scale than the existing buildings on site  Excessive bulk and massing  Overbearing in relation to neighbouring buildings  Commercial buildings proposed will be out of character with the street  Excessive glazing on the frontage</p> <p><b>Impact on neighbours</b></p> <p>Loss of privacy/overlooking  Loss of daylight and sunlight  Noise and disturbance  Block A and B will impact on amenity  Overshadowing  Visual impact  Light pollution  Concerns the commercial units will have balconies</p> <p><b>Parking, Transport and Highways</b></p> <p>Cross Lane is too narrow  The road should be widened  No parking should be permitted  Increased traffic generated  Pressure on parking  Road safety concerns</p>	<p>The scale and design reflects neighbouring buildings to compliment their architecture. The scale would increase to reflect surrounding developments. The scale is not found to be out of character with the area. The proposed glazing reflects neighbouring developments.</p> <p>As noted in the neighbouring amenity section above the proposal would not have a significant impact on neighbouring properties in terms of privacy, daylight or sunlight. The proposal will not result in any greater noise or light levels than should be expected in an urban area.</p> <p>The proposal has been reviewed by the Council's Transportation officers and found to be acceptable in terms of parking and servicing.</p> <p>Cross Lane is required for servicing and access, the</p>

Stakeholder	Question/Comment	Response
	<p>Concerns the access road would not be sufficient for this development  Increased vehicle trips per day  Parking stress  Increased deliveries  Impact on existing refuse collection vehicles  Cross Lane should be a pedestrian route only</p> <p style="text-align: center;"><b>Environment and Public Health</b></p> <p>Lighting on Cross Lane should be improved</p> <p>More greenery should be incorporated into the design  The landscaping proposal is insufficient</p> <p>Significant increase in pollution</p> <p>Noise pollution  Impact on trees</p> <p>Dust and debris during demolition phase</p> <p>The environment on Cross Lane requires significant improvements  The development will improve the area  The area is densely populated  The first phase of the development on Cross Lane was a nuisance</p>	<p>parking levels reflects the existing parking on the site and is found to be acceptable. The number of vehicle trips will not have a significant impact on traffic.</p> <p>Improved lighting is not considered necessary to make this development acceptable in planning terms.  The low urban greening factor is noted in the report above and a condition attached seeking greater greening.</p> <p>The proposal is not found to increase pollution and would be air quality neutral.  There would be no significant increase in noise pollution.  The impact on trees is considered acceptable, there are no trees on the site.  Construction impacts would be temporary and controlled through conditions to minimise the impact.  The proposal will improve the environment on Cross lane.</p>

Stakeholder	Question/Comment	Response
	<p>Security concerns</p> <p>Pressure on existing infrastructure</p> <p>Asbestos concerns during demolition</p> <p>Open green space and the planting of trees should be considered</p> <p><b>Sustainability</b></p> <p>Concerns with the embodied carbon from the demolition phase</p> <p>Refurbishing the existing building should be considered</p>	<p>Noted.</p> <p>Construction impacts are temporary and mitigated by conditions.</p> <p>The Met secure by design officer find the proposal to be acceptable.</p> <p>The proposal will make a contribution to local infrastructure through the Community Infrastructure Levy.</p> <p>The management of asbestos is controlled through other legislation.</p> <p>Noted.</p> <p>Refurbishment of the building would not deliver the housing proposed and other benefits.</p>