

Appendix 3: Internal and External Consultee representations

Stakeholder	Question/Comment	Response																												
INTERNAL																														
LBH Carbon Management	<p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy Statement Addendum (dated February 2023), prepared by Aecom • Technical Professional Judgement Statement on Whole Life Carbon from Aecom (dated 10 February 2023), prepared by Aecom <p>1. Overview of changes</p> <p>Earlier Carbon Management comments for this application were issued on 26/10/21, 17/1/22, and 17/6/22. The previous design iteration was heard at Planning Sub Committee in September 2022, and this response only relates to the consultation following the planning committee resolution to grant permission. The design changes relate to adding a second stair core within the design massing.</p> <p>This has resulted in the loss of cluster rooms, reduction in floor area for communal amenity, shared kitchen lounges, reception / co-working space, and roof lounge.</p> <p>The overall energy strategy for the development has not changed. However, it has resulted in the reduction of overall modelled energy demand. Revised modelling was undertaken with Part L 2013 and SAP10 carbon factors.</p> <p>2. Energy performance</p> <p>The development achieves a site-wide reduction of 63% carbon dioxide emissions on site from a Part L 2013 compliant baseline.</p> <table border="1" data-bbox="501 1066 1684 1383"> <thead> <tr> <th colspan="4" data-bbox="501 1066 1684 1098"><i>Site-Wide DEN Connection Scenario (SAP10 emission factors)</i></th> </tr> <tr> <th data-bbox="501 1098 801 1193"></th> <th data-bbox="801 1098 1093 1193">Total regulated emissions (Tonnes CO₂ / year)</th> <th data-bbox="1093 1098 1391 1193">CO₂ savings (Tonnes CO₂ / year)</th> <th data-bbox="1391 1098 1684 1193">Percentage savings (%)</th> </tr> </thead> <tbody> <tr> <td data-bbox="501 1193 801 1225">Part L 2013 baseline</td> <td data-bbox="801 1193 1093 1225">414.8</td> <td data-bbox="1093 1193 1391 1225"></td> <td data-bbox="1391 1193 1684 1225"></td> </tr> <tr> <td data-bbox="501 1225 801 1257">Be Lean</td> <td data-bbox="801 1225 1093 1257">488</td> <td data-bbox="1093 1225 1391 1257">-73.2</td> <td data-bbox="1391 1225 1684 1257">-18%</td> </tr> <tr> <td data-bbox="501 1257 801 1289">Be Clean + Green</td> <td data-bbox="801 1257 1093 1289">152.6</td> <td data-bbox="1093 1257 1391 1289">335.3</td> <td data-bbox="1391 1257 1684 1289">81%</td> </tr> <tr> <td data-bbox="501 1289 801 1321">Cumulative savings</td> <td data-bbox="801 1289 1093 1321"></td> <td data-bbox="1093 1289 1391 1321"></td> <td data-bbox="1391 1289 1684 1321">63%</td> </tr> <tr> <td data-bbox="501 1321 801 1383">Carbon shortfall to offset (tCO₂)</td> <td data-bbox="801 1321 1093 1383">152.6</td> <td data-bbox="1093 1321 1391 1383"></td> <td data-bbox="1391 1321 1684 1383"></td> </tr> </tbody> </table>	<i>Site-Wide DEN Connection Scenario (SAP10 emission factors)</i>					Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)	Part L 2013 baseline	414.8			Be Lean	488	-73.2	-18%	Be Clean + Green	152.6	335.3	81%	Cumulative savings			63%	Carbon shortfall to offset (tCO₂)	152.6			Recommended conditions and s106 heads of terms included. The proposal would therefore be acceptable.
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Carbon offset contribution

£434,910 (to be recalculated at pre-commencement stage)

3. Whole Life Carbon

The analysis on the design changes showed that the change to the WLC results were considered marginal and will not significantly affect the performance against the benchmarks due to a similar total amount of structural material used in the scheme.

4. Conclusion

Overall, it is considered that the design changes do not have any material impact on the development previously presented to Planning Sub Committee in September 2022, and these can be supported.

All previous recommended planning conditions and heads of terms remain unchanged and relevant, apart from the revised Energy Strategy condition below which has been drafted to reflect the calculation amendments.

Planning Conditions [Revised]

Energy Strategy Condition

(a) Prior to the commencement of the development's superstructure, a revised Energy Statement shall be submitted and approved by the Local Planning Authority. This shall be based on the submitted Energy Statement v2, including the Appendices (dated December 2021) and Addendum (dated February 2023), prepared by Aecom, delivering a minimum site-wide carbon emission reduction of 63% using SAP 10.0 carbon factors by connecting to the Decentralised Energy Network (DEN) in the future or 52% using SAP 10.0 carbon factors if the air source heat pump back up solution is implemented, in line with Building Regulations Part L 2013. The revised strategy shall include the following unless otherwise agreed with the local authority:

1. *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;*
2. *A minimum 14.3 kWp solar photovoltaic array;*
3. *A strategy to seek to improve and respond to the Be Lean requirement to improve the fabric efficiencies towards a 15% reduction with SAP 10.0 carbon factors, including calculations showing how thermal bridging will be reduced;*
4. *Confirmation of the specification, efficiency, layout of the interim heating solution before connecting to the DEN if required;*

	<p>5. <i>Details of the estimated comparative running costs for the heating solutions.</i></p> <p>6. <i>A metering strategy.</i></p> <p><i>(b) Within six months of the occupation of the development, evidence that the ASHPs (if installed) and solar PV panels have been correctly installed shall be submitted to and approved in writing by the Local Planning Authority, including photographs, and a six-month energy generation statement.</i></p> <p><i>(c) Within six months of the occupation of the development, 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>Should the agreed target not be able to be achieved on site through energy measures as set out in the aforementioned strategy, then any shortfall should be offset at an agreed amount. Should an increased level of CO2 reduction be achieved, any carbon offset payment would be reduced by an agreed amount.</i></p> <p><i>The final agreed energy strategy shall be installed and operation prior to the first occupation of the development. The development shall be carried out strictly in accordance with the details so approved, unless otherwise agreed in writing with the local authority, and shall be operated and maintained as such thereafter. The solar PV array shall be also installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.</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, SI3, and Local Plan Policy SP4 and DM22.</i></p>	
LBH Conservation Officer	See previous comments in Appendix 1	The amendments include only minimal changes to the exterior of the building and do not affect the materials, massing, and finishes.
LBH Design Officer	The latest changes to this application make no significant or meaningful alteration to its design, appearance, amenity standards or impact on neighbours, and I can therefore see no reason to change my previous comments.	

<p>LBH Local Lead Flood Authority/Drainage</p>	<p>Thank you for consulting us on the above planning application reference number HGY/2021/2304 for the Redevelopment of site including demolition of existing buildings to provide a part 7, part 24 storey building of purpose-built student accommodation [PBSA] (Sui Generis); with part commercial uses [retail] (Use Class E(a)) at ground and first floor; and associated access, landscaping works, cycle parking, and wind mitigation measures. - RE-CONSULTATION on design updates to accommodate an additional stair and lift for evacuation in the event of a fire at 29-33, The Hale, London, N17 9JZ.</p> <p>Having reviewed the applicant's submitted Flood Risk Assessment and Drainage Strategy Report, document reference number 60644390 dated July2021 and other related data and drawings as prepared by AECOM Consultant, we have no further comments to make on the above application. We are content that the impact of surface water drainage have been addressed adequately.</p> <p>Hope the above is helpful. Please do not hesitate to contact me should you require any further information.</p>	<p>Noted the applicant has followed the London Plan hierarchy and the proposed SuDS features are acceptable subject to FRA recommendations being secured by condition.</p>
<p>LBH Pollution</p>	<p>Thanks for re-contacting the Carbon Management Team (Pollution) regarding the above proposal of the Redevelopment of site including demolition of existing buildings to provide a part 7, part 24 storey building of purpose-built student accommodation [PBSA] (Sui Generis); with part commercial uses [retail] (Use Class E(a)) at ground and first floor; and associated access, landscaping works, cycle parking, and wind mitigation measures and I will like to comment as follows.</p> <p>Having considered all the relevant supportive information especially the Air Quality Assessment report with reference 60644390 prepared by AECOM Ltd dated June 2021 taken note of sections 3 (Assessment Methodology), 4 (Baseline Conditions), 5 (Results), 6 (Environmental Design & Management) and 7 (Summary & Conclusions), Phase1 Land Contamination Report with reference 60644390 prepared by AECOM Ltd dated 18th June 2021 taken note of sections 6 (Geo-Environmental Conceptual Model), 7 (Preliminary Risk Assessment), 8 (Conclusions & Recommendations) and Table 7.4</p>	<p>Noted conditions on Land Contamination, Unexpected Contamination, NRRM and Demolition/Construction Environmental Management Plans which are all recommended.</p>

(Preliminary Risk Assessment – Potential Sources, Pathways and Receptors) and Energy Statement Addendum with reference 60644390 prepared by AECOM Ltd. Dated 10th February 2023 taking note of Sections 2 (Proposed Design Changes), 3 (Impact on Proposed Energy Strategy and Carbon Savings) and 4 (Conclusions) with the proposed connection to the THDEN district heating network and use of Photovoltaic (PV) array. Please be advised that we have no objection to the proposed development in respect to air quality and land contamination, but the following planning conditions are recommended should planning permission be granted.

1. Land Contamination

Before development commences other than for investigative work:

- a. A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information.
- b. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority.
- c. If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed 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.
- d. 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.
- e. Where remediation of contamination on the site is required, completion of the

remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

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

2. Unexpected Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.

3. NRMM

a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NO_x and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <http://nrmm.london/>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.

b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be

regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.

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

4. Demolition/Construction Environmental Management Plans

a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst

b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.

The following applies to both Parts a and b above:

a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).

b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:

i. A construction method statement which identifies the stages and details how works will be undertaken;

ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;

iii. Details of plant and machinery to be used during demolition/construction works;

iv. Details of an Unexploded Ordnance Survey;

v. Details of the waste management strategy;

vi. Details of community engagement arrangements;

vii. Details of any acoustic hoarding;

viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);

ix. Details of external lighting; and,

x. Details of any other standard environmental management and control measures to be implemented.

c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:

i. Monitoring and joint working arrangements, where appropriate;

ii. Site access and car parking arrangements;

iii. Delivery booking systems;

iv. Agreed routes to/from the Plot;

v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and

vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and

vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.

d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:

i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;

ii. Details confirming the Plot has been registered at <http://nrmm.london>;

iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;

iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);

v. A Dust Risk Assessment for the works; and

	<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>I hope the above clarifies our position on the above application? Otherwise, feel free to revert back to us should you have any further query in respect of the application quoting M£ reference number WK/559358.</p>	
<p>LBH Transportation</p>	<p>Transport comments are as follows:</p> <ol style="list-style-type: none"> a. The proposed changes results in reduction of 20 rooms. This revision will result in corresponding reduction of trip generation. b. The proposals will include provision for cycle parking to comply with London Plan standards. However, the layout of cycle parking should also meet guidance in London Cycling Design Standards. c. There are no changes proposed to provision for servicing and delivery. d. The principles, targets and measures set out in the Interim Travel Plan remain unchanged. e. All previous transport comments, conditions, s106 obligations / contribution etc should be considered as relevant and applicable – Please note, I have not revisited or reviewed the original transport assessment for this re-consultation. If this is necessary, please let me know. <p>Subject to the above, there are no transport objections regarding the proposed revisions.</p>	<p>Following satisfactory responses to queries, no objection subject to recommended conditions and s106/s278 obligations.</p>

<p>LBH Waste Management</p>	<p>I've had a look at the latest documents relating to this development HGY/2021/2304 - 29-33, The Hale, London, N17 9JZ, concerning the re-consultation on design updates to accommodate an additional stair and lift for evacuation in the event of a fire.</p> <p>From the information provided, there is no impact on the waste and recycling storage arrangements, so I have no comments on this.</p>	<p>Noted – Waste plan condition added.</p>
<p>EXTERNAL</p>		
<p>Thames Water</p>	<p>Waste Comments The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. “No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.” Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p>	<p>Noted conditions are recommended.</p>

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

As per Building regulations part H paragraph 2.21, Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Please refer to our website for further information : www.thameswater.co.uk/help

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development” The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition 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 water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works

will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

Following initial investigations Thames Water has identified that, the proposed

development is located within Source Protection Zone of a groundwater abstraction source. These zones are used for potable water sources for public water supply for which Thames Water has a statutory duty to protect. Thames Water request that the following condition be added to any planning permission. "Development here by approved shall not commence until a Source Protection Strategy detailing, how the developer intends to ensure the water abstraction source is not detrimentally affected by the proposed development both during and after its construction has been submitted to and approved by, the local planning authority in consultation with the water undertaker. The development shall be constructed in line with the recommendations of the strategy. Reason - To ensure that the water resource is not detrimentally affected by the development. More detailed information can be obtained from Thames Waters' Groundwater Resources Team email GroundwaterResources@Thameswater.co.uk Tel: 0203 577 3603. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our

	<p>assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk</p> <p>Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p> <p>Supplementary Comments</p> <p>Development site is situated within SPZ2. Condition 40 captures the need for foundation design to minimise impact on groundwater. No further comments needed on this proposed change above ground.</p>	
<p>Greater London Archaeology Advisory Service (GLAAS)</p>	<p>Recommend Pre-Determination Archaeological Assessment/Evaluation</p> <p>I have looked at this proposal and at the Greater London Historic Environment Record, but I need more information before I can advise you on the effects on archaeological interest and their implications for the planning decision. If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.</p> <p>The planning application lies in an area of archaeological interest.</p> <p>The site lies close to the 2020 discovery of a mesolithic "home base" site at the former Welbourne Centre. Well-preserved early prehistoric sites are of high</p>	<p>Concern noted. The investigation can be carried out prior to development and any heritage assets found suitably displayed and recorded as necessary. Conditions and informatives achieve the asset protection.</p>

heritage significance. The extent and detailed significance of the mesolithic site is not known, but it was deemed to be of regional importance based on the initial assessment during the fieldwork that took place.

The application site lies on the same stream that fronted the Welbourne site and also lies closer to the early centre of The Hale, an early mediaeval settlement. Archaeological remains of the early mediaeval, mediaeval and post-mediaeval development of the Hale were recently found at the nearby Ferry Island and Ferry Island North sites to the immediate south of the application site.

The applicants' desk-based heritage statement accompanying the application suggests a moderate potential for mesolithic remains and a high potential for early mediaeval and mediaeval remains. The proposed tower at the site would include a full basement which would not allow preservation of important remains. Modern impacts at the site appear to be limited.

Given the potential for important remains and the desirability in local, national and London Plan policy of sympathetically managing such remains, this office previously advised the applicants' consultants (December 2020) that predetermination archaeological evaluation is appropriate at the site, as per NPPF 194.

In the absence of this work and also without any geotechnical data to inform on the survival of key deposits, it is not possible to reliably advise on the policy compliant management of any important remains at the site.

Because of this, I advise the applicant completes these studies to inform the application:

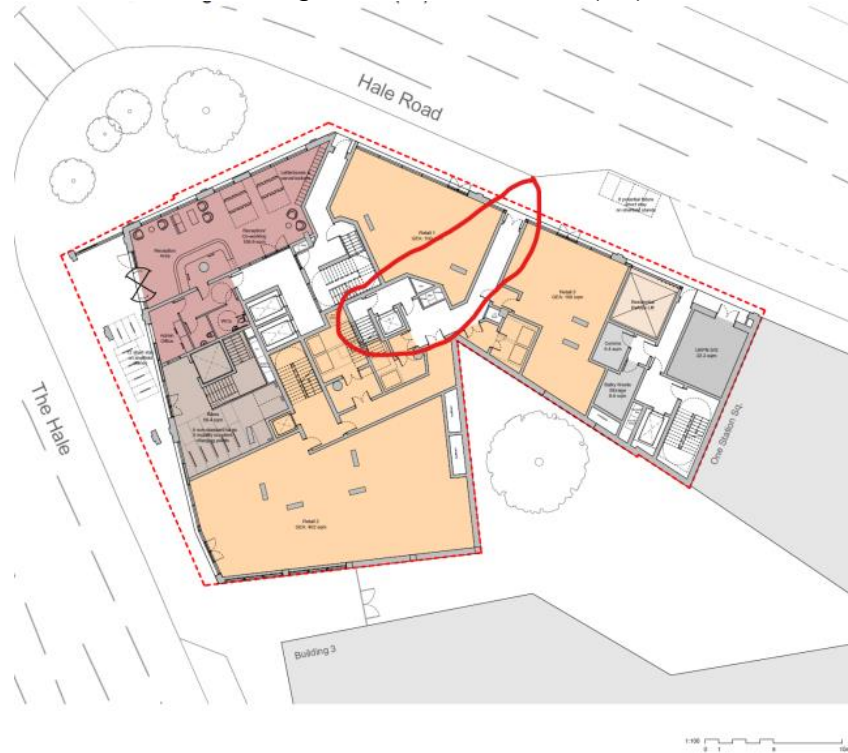
An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques

	<p>depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.</p> <p>I will need to agree the work beforehand and it should be carried out by an archaeological practice appointed by the applicant. The report on the work must set out the significance of the site and the impact of the proposed development. I will read the report and then advise you on the planning application.</p> <p>NPPF paragraphs 199 - 200 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non-designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 203). Conservation can mean design changes to preserve remains where they are. If preservation is not achievable then if you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms.</p> <p>You can find more information on archaeology and planning in Greater London on our website.</p> <p>This response only relates to archaeology. You should also consult Historic England's Development Management team on statutory matters.</p>	
<p>Health and Safety Executive</p>	<p><i>Comments received 20/02/2032:</i></p> <p>Headline response from HSE 'content'</p> <p>Scope of consultation</p>	<p>The introduction of the additional stair and evacuation lift has resulted in the HSE being content with the proposals in terms of</p>

	<p>1.1 The above application relates to the demolition of existing buildings and the development of a relevant building. The building will provide two connected towers, 7 and 24 storeys with a basement. The proposed building is 79 m in height.</p> <p>1.2 The development design has been amended from the previous consultation and is now a multi-stair building with two stairs serving flats at all levels.</p> <p>Previous consultation</p> <p>1.3 HSE issued a substantive response (significant concern) dated 23/09/2022, under the reference pgo-1852, in relation to a consultation received on 25/08/2022.</p> <p>Current consultation</p> <p>1.4 A subsequent email was received from the LPA on 30/01/2023 requesting a further consultation this included a request to hold a meeting to with the applicant's design team to discuss the outstanding concern. Documents were provided with the email, including amended drawings uploaded onto the LPA planning register on 30/01/2023 and a revised fire statement dated 27/01/2023. These documents will be referred to as 'the applicant's response'.</p> <p>1.5 For the avoidance of doubt, this substantive response is in relation to the applicant's response.</p> <p>The applicant's response & virtual meeting</p> <p>Means of escape</p> <p>1.6 A virtual meeting was held on 14/02/2023 with HSE, LPA and the applicant's design team present.</p>	<p>escape in the event of fire.</p> <p>The applicant has responded to these points and advises that they will develop the strategy as they move into more detailed design stages.</p> <p>The conditions would ensure that the commitments made in the submitted statements are realised.</p>
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	<p>1.7 The applicant's design team presented the amended drawings that were uploaded onto the LPA planning register on 30/01/2023.</p> <p>1.8 The drawings show that a third escape stair has been added into the building design that serves all residential levels. The means of escape arrangements are at least two stairs serve every residential level and one stair (new escape stair) terminates at ground floor level i.e. does not descend to the basement. HSE welcomes the design changes made by the applicant.</p> <p>1.9 Following a review of the information provided in the revised planning application, HSE is satisfied with the fire safety design, to the extent that it affects land use planning.</p>	
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Ground floor, drawing no: 15411-A-PL-X-(03)-101



Comments received 13/04/2023:

Previous consultation

1.3 HSE issued a substantive response (significant concern) dated 23/09/2022, under the reference pgo-1852, in relation to a consultation received on 25/08/2022.

1.4 HSE issued a further substantive response (content) dated 20/02/2023, under the reference pgo-2716, in relation to a consultation received on 30/01/2023. Revised plans were submitted and a virtual meeting was held on 14/02/2023 to discuss the amended design detail.

	<p>Current consultation</p> <p>1.5 A subsequent email was received from the LPA on 20/03/2023 requesting a further consultation. It is noted that a revised fire statement by Aecom dated 16/03/2023 and revised plans have been added to the planning register. This provides detail of the design changes submitted with the previous consultation, i.e. the addition of a stair core (ground – level 23) providing a minimum of two stairs at all residential levels that were discussed during the virtual meeting.</p> <p>1.6 Following a review of the information provided in the revised fire statement, HSE is satisfied with the fire safety design, to the extent that it affects land use planning.</p>	
London Fire Brigade	<p>Previous comments on the scheme members resolved to grant last September were as follows:</p> <p>The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.</p> <p>The Commissioner has been consulted with regard to the above-mentioned premises and makes the following observations:</p> <ul style="list-style-type: none"> • The Commissioner is satisfied with the proposals for fire fighting access as contained within the fire statement documents and if they provide them in accordance with what's highlighted within the fire service section it would provide satisfactory fire fighting facilities • The Commissioner strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers and can reduce 	Noted.

	<p>the risk to life. The Commissioner's opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupier. Please note that it is our policy to regularly advise our elected Members about how many cases there have been where we have recommended sprinklers and what the outcomes of those recommendations were. These quarterly reports to our Members are public documents which are available on our website.</p>	
<p>Metropolitan Police - Designing Out Crime Officer</p>	<p>I have reviewed the LB Haringey planning portal and do not see the addition of a second lift and stair core as an issue for Secured by Design on the project as long as the existing SbD advice is followed where door sets and access control is concerned.</p>	<p>Noted, recommendation includes a planning condition requiring a 'Secured by Design' accreditation to be achieved for each building before the building is occupied and the inclusion of an informative.</p>
<p>Transport for London</p>	<p>Thank you for consulting TfL regarding the above application.</p> <p>The development site is located directly adjacent to The Hale, which is part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.</p> <p>After reviewing 'The Hale Design and Access Addendum', it does not appear that the design updates contain any material changes to transport and access-related matters which are of concern to TfL.</p> <p>Considering the design amendments required to accommodate the secondary staircase and evacuation lift, there is a very minor improvement to the cycle space</p>	<p>Support for car free and the proposed level of cycle parking noted.</p> <p>A Construction Logistics Plan is required by way of condition which would safeguard safety during construction.</p>

	<p>ratio by virtue of the loss of student accommodation rooms and reduction of retail space.</p> <p>Please note that this represent the view of TfL and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. In addition, these comments do not necessarily represent the views of the GLA.</p> <p>Notwithstanding the above comments, I would like to draw to your attention that the applicant must ensure that external doors do not open outwards onto the highway, specifically those related to retail units 1 and 3.</p>	
London Underground/DLR Infrastructure Protection	I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.	No comment.
Natural England	<p>Natural England has previously commented on this proposal and made comments to the authority in our letter dated 7th September 2021 (Our Ref: 363851).</p> <p>The advice provided in our previous response applies equally to this amendment although we made no objection to the original proposal.</p> <p>The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.</p> <p>Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.</p>	Noted.

<p>Environment Agency</p>	<p>No comments on amendments, previous comments:</p> <p>We have assessed it as having low environmental risk and therefore have no comments.</p> <p>The site is located in Flood Zone 2 and therefore Flood Risk Standing Advice (FRSA) applies for this application. Standard comments can be viewed online here - FRSA.</p> <p>The site is also located in Source Protection Zone 2 however, the previous use of the site is of low polluting potential (As defined on gov.uk, Land contamination DoE industry Profiles) and therefore we would have no comments with respect to contaminated land.</p>	<p>No comment.</p>
<p>GLA</p>	<p>Please see further Post Stage 1 comments, below:</p> <p>1. Energy The applicant has responded to some of the outstanding queries but there are items still to be addressed. Please see the updated memo, attached.</p> <p>2. Air quality Response to Stage 1 comments by the AQ consultants AECOM (circulated to GLA Officers on 10/01/2023) are considered sufficient. The conditions proposed in Stage 1 stand and no further action from AECOM is required to fulfil AQ requirements.</p> <p>3. Flood risk No additional information has been provided regarding previous comment on the requirement to include rainwater harvesting. This remains outstanding and should be addressed</p> <p>4. Fire safety</p>	<p>The LPA considers that the proposal meets the aims and objectives of the Development Plan.</p> <p>Energy matters have been considered by the Council's Carbon Management team who have recommended conditions and heads of terms. Any responses to queries will be shared with the GLA as and when they are available.</p>

	<p>In comments provided to the Council on the 7 December 2022, GLA Officers stated that “the submitted fire statement does not confirm that the author is suitably qualified and evidence of competency of the author of the Fire Statement has not been detailed in a clearly identified section at the beginning of the Fire Statement. In accordance with D12 and the draft Fire Safety LPG, the fire statement must either to be amended to confirm this information, or the conditions previously suggested by GLA Officers, required the submission of a fire statement that accords with Policy D12 and D5(b5) must be provided”.</p> <p>A revised fire statement has been provided to the Council which confirms the qualifications of the assessor involved in its assessment (CEng, BEng, MIFireE).</p> <p>In respect of Policy D5(B5), the revised fire statement states that “Provisions have been made throughout the proposed development to include evacuation lifts and level escape as to meet the intention of D5 of the London Plan”. Compliance with Policy D5(b5) should be secured by condition.</p> <p>Revised plans that include a 2nd staircase have been submitted to the local planning authority. Specifically, as set out in the revised fire statement “<i>The building is proposed to be provided with three stairs serving the main use of the building. One of the stairs is to extend from basement floor to the seventh floor, another stair will extend from basement floor to the twenty-fourth floor (all floors), and another stair will extend from ground floor to twenty-third floor. The two-storey retail unit will also be provided with an internal protected stair (extending from ground floor to first floor) for escape</i>”.</p> <p>The Council should confirm that the LFB has been consulted in respect of this proposed arrangement.</p> <p>For your information and reference, following the Governments recent consultation on Fire Safety https://www.gov.uk/government/news/government-proposes-second-staircases-to-make-buildings-safer which includes the requirement for second</p>	<p>The scheme includes a rainwater storage tank to manage run off rates, but the constrained nature of the site does not allow for meaningful harvesting.</p> <p>Compliance with Policy D5(b5) will be secured by the relevant recommended condition and the LFB have been consulted.</p> <p>Recommended conditions would ensure the submitted scheme accords with the requirements set out in Policy E10 Part H of the London Plan.</p>
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staircases in residential buildings over 30 metres, the GLA has issued a statement for how we will be dealing with current applications in the planning pipeline: <https://www.london.gov.uk/programmes-strategies/planning/planning-applications-and-decisions/referral-process-lpas#statement-regarding-fire-safety-and-tall-buildings-title%20GLA%20Planning%20Team>

It is noted that a condition was previously recommended in relation to the superseded version of the fire statement that stated “*any variation as may be approved in writing by the Council in consultation with the GLA”*. This underlined text was not recommended by GLA Officers and should be removed.

5. Draft S106

Please can an update be provided in respect of the revised S106 and GLA Officers’ comments circulated on 7 December 2022.

Further to the above, please also see further comments on this scheme in respect of inclusive access and whole life cycle carbon:

1. Inclusive access

The GLA has recently published a practice note which provides clarification on the accessibility requirements of the London Plan 2021 for self-contained and non-self-contained student accommodation. I have attached the note to this email for your information and reference.

The Council should ensure the submitted scheme accords with the requirements set out in Policy E10 Part H of the London Plan.

2. Whole life cycle carbon

The GLA WLC Team that they have no further queries (13/04/2023)