

Appendix 3: Internal and External Consultee Representations

Stakeholder	Comment	Response																					
INTERNAL																							
Carbon Management	<p>Carbon Management Response 26/06/2024</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy & Sustainability Statement prepared by P3R (dated 19 February 2024) • CIBSE TM52 Overheating Assessment prepared by P3R (dated 20 February 2024) • BREEAM Pre-Assessment prepared by FOCUS (dated January 2024) • Relevant supporting documents. <p>1. Summary</p> <p>The development achieves a reduction of 86.5% (DEN scenario), or 15.6% (heat pump scenario) in carbon dioxide emissions on site. Some clarifications must be provided with regard to the Energy Strategy. Planning conditions have been recommended to secure the benefits of the scheme, and to provide further scrutiny into the Overheating Strategy.</p> <p>2. Energy Strategy</p> <p>Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L 2021). The London Plan (2021) further confirms this in Policy SI2.</p> <p>The overall predicted reduction in CO₂ emissions for the development shows an improvement of approximately 86.5% (DEN scenario), or 15.6% (heat pump scenario) in carbon emissions, from the Baseline development model (which is Part L 2021 compliant).</p> <p>London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are 5.1 tCO₂.</p> <table border="1" data-bbox="409 1249 1693 1473"> <thead> <tr> <th data-bbox="409 1249 611 1289">Residential</th> <th colspan="3" data-bbox="611 1249 1155 1289">DEN scenario</th> <th colspan="3" data-bbox="1155 1249 1693 1289">ASHP scenario</th> </tr> <tr> <th data-bbox="409 1289 611 1473"></th> <th data-bbox="611 1289 797 1473">Total regulated emissions (Tonnes)</th> <th data-bbox="797 1289 954 1473">CO₂ savings (Tonnes CO₂ / year)</th> <th data-bbox="954 1289 1155 1473">Percentage savings (%)</th> <th data-bbox="1155 1289 1341 1473">Total regulated emissions (Tonnes)</th> <th data-bbox="1341 1289 1498 1473">CO₂ savings (Tonnes CO₂ / year)</th> <th data-bbox="1498 1289 1693 1473">Percentage savings (%)</th> </tr> </thead> <tbody> <tr> <td data-bbox="409 1473 611 1473"></td> <td data-bbox="611 1473 797 1473"></td> <td data-bbox="797 1473 954 1473"></td> <td data-bbox="954 1473 1155 1473"></td> <td data-bbox="1155 1473 1341 1473"></td> <td data-bbox="1341 1473 1498 1473"></td> <td data-bbox="1498 1473 1693 1473"></td> </tr> </tbody> </table>	Residential	DEN scenario			ASHP scenario				Total regulated emissions (Tonnes)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)	Total regulated emissions (Tonnes)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)								<p>The recommended conditions address the comments, including the need for an updated energy strategy, overheating, MVHR and BREEAM accreditation.</p> <p>Recommended s106 planning obligations to facilitate connection to a future DEN.</p>
Residential	DEN scenario			ASHP scenario																			
	Total regulated emissions (Tonnes)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)	Total regulated emissions (Tonnes)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)																	

Stakeholder	Comment						Response				
		CO ₂ / year)			CO ₂ / year)						
	Baseline	53.6			14.6						
	Be Lean		45.78	85.4%	12.9	1.67	11.5%				
	Be Clean		1.3	0%	0	1.3	0%				
	Be Green	7.22	0.6	1.1%	12.28	0.6	4.1%				
	Cumulative savings		46.38	86.5%		2.27	15.6%				
	Carbon shortfall to offset (tCO₂)	7.22			12.28						
	<p>Actions:</p> <ul style="list-style-type: none"> - The carbon reduction tables are not presented correctly. Please correct: <ul style="list-style-type: none"> o The DEN tables should separate out Be Lean and Be Clean savings. o The Be Clean savings are not translated into % savings. o On page 21 of the ES, the DEN scenario sees an 85% saving under Be Lean, and none under Be Clean. This doesn't make sense, so please clarify and correct. - Please confirm the heating strategy and ventilation system assumed under the Baseline and Be Lean scenarios (including the gross efficiency figure(s)). For non-residential applications the baseline should align with the proposed heating system, i.e. if proposing an air source heat pump, this should be specified with the efficiency values set out in Part L 2021 for that system under Be Lean. - Please submit the GLA's Carbon Emission Reporting Spreadsheet to validate the above. <p>Energy Use Intensity (EUI) / Space Heating Demand (SHD) Applications are required to report on the total Energy Use Intensity (EUI) and Space Heating Demand (SHD), in line with the GLA Energy Assessment Guidance (June 2022). The Energy Strategy should follow the reporting template set out in Table 5 of the guidance, including what methodology has been used. EUI is a measure of the total energy consumed annually, but should exclude on-site renewable energy generation and energy use from electric vehicle charging.</p> <table border="1" data-bbox="409 1444 1617 1484"> <tr> <td data-bbox="409 1444 678 1484"></td> <td data-bbox="678 1444 1153 1484">Proposed Development</td> <td data-bbox="1153 1444 1617 1484">GLA Benchmark</td> </tr> </table>								Proposed Development	GLA Benchmark	
	Proposed Development	GLA Benchmark									

Stakeholder	Comment			Response																				
	Building type	Student / Commercial	Hotel/All other non-residential																					
	EUI	kWh/m ² /year	Meets/Does not meet GLA benchmark of 55 kWh/m ² /year (eq. to hotel)																					
	SHD	kWh/m ² /year	Meets/Does not meet GLA benchmark of 15 kWh/m ² /year																					
	Methodology used																							
	<p>Actions:</p> <ul style="list-style-type: none"> - What is the calculated Energy Use Intensity (excluding renewable energy)? How does this perform against GLA benchmarks, i.e. at 55 kWh/m²/year? Please submit the information in line with the GLA's reporting template. - What is the calculated space heating demand? How does this perform against the GLA benchmark of 15 kWh/m²/year? Please submit the information in line with the GLA's reporting template. <p>Energy – Lean</p> <p>The amendments required above need to be clarified before we can assess if it goes beyond the minimum 15% reduction respectively set in London Plan Policy SI2.</p> <p>The following u-values, g-values and air tightness are proposed:</p> <table border="1" data-bbox="412 994 1581 1487"> <tbody> <tr> <td>Floor u-value</td> <td>0.11 W/m²K</td> </tr> <tr> <td>External wall u-value</td> <td>0.14 W/m²K</td> </tr> <tr> <td>Roof u-value</td> <td>0.11 W/m²K</td> </tr> <tr> <td>Door u-value</td> <td>1.60 W/m²K</td> </tr> <tr> <td>Window u-value</td> <td>1.00 W/m²K</td> </tr> <tr> <td>G-value</td> <td>0.30</td> </tr> <tr> <td>Air permeability rate</td> <td>3 m³/hm² @ 50Pa</td> </tr> <tr> <td>Ventilation strategy</td> <td>Mechanical ventilation with local air handling units, with option of opening windows</td> </tr> <tr> <td>Low energy lighting</td> <td>2.5 W/m² (bedrooms); 3.5 W/m² (transient) per 100 Lux</td> </tr> <tr> <td>Heating system (efficiency / emitter)</td> <td>Student bedrooms: VRF system</td> </tr> </tbody> </table>			Floor u-value	0.11 W/m ² K	External wall u-value	0.14 W/m ² K	Roof u-value	0.11 W/m ² K	Door u-value	1.60 W/m ² K	Window u-value	1.00 W/m ² K	G-value	0.30	Air permeability rate	3 m ³ /hm ² @ 50Pa	Ventilation strategy	Mechanical ventilation with local air handling units, with option of opening windows	Low energy lighting	2.5 W/m ² (bedrooms); 3.5 W/m ² (transient) per 100 Lux	Heating system (efficiency / emitter)	Student bedrooms: VRF system	
Floor u-value	0.11 W/m ² K																							
External wall u-value	0.14 W/m ² K																							
Roof u-value	0.11 W/m ² K																							
Door u-value	1.60 W/m ² K																							
Window u-value	1.00 W/m ² K																							
G-value	0.30																							
Air permeability rate	3 m ³ /hm ² @ 50Pa																							
Ventilation strategy	Mechanical ventilation with local air handling units, with option of opening windows																							
Low energy lighting	2.5 W/m ² (bedrooms); 3.5 W/m ² (transient) per 100 Lux																							
Heating system (efficiency / emitter)	Student bedrooms: VRF system																							

Stakeholder	Comment		Response
		Student common parts: low-profile electric heaters and electric towel rails	
	Cooling demand	38,905 MJ/year and 31.7 MJ/m ² (improvement from notional)	
	Improvement from the target fabric energy efficiency (TFEE)	Not provided	
	<p>Actions:</p> <ul style="list-style-type: none"> - Will the ventilation unit recover heat? What will the efficiency and fan power be? - Provide the average % improvement on the FEES. <p>Overheating is dealt with in more detail below.</p> <p>Energy – Clean</p> <p>London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs.</p> <p>The development is within 500 meters of a planned future DEN, so the development is expected to secure connection subject to demonstration of technical feasibility and financial viability.</p> <p>The Be Clean strategy to connect to the DEN is generally acceptable, although further evidence should be provided that the VRF system is compatible with future DEN connection. Some evidence should be provided that the DEN system was inputted into the SAP model and that the plant room is adequately sized for a substation.</p> <p>The applicant will need to demonstrate that they will provide the following details prior to the commencement of construction:</p>		

Stakeholder	Comment	Response
	<p>a) Buried pipe (dry and filled with nitrogen) to our specification from the GF plant room to a manhole at the boundary of their site and evidence of any obstructions in highway adjacent to connection point;</p> <p>b) A good quality network within the building – 60/40 F&R, <50W/dwelling losses from the network – ideally to an agreed standard in the S106;</p> <p>c) A clear plan for QA of the network post-design approval through to operation, based on CP1;</p> <p>d) A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set.</p> <p>Actions:</p> <ul style="list-style-type: none"> – Please submit a site plan showing the connection point at the edge of the site, location of a pipe between the connection point and plant room, and plant room layout and schematics. <p>Energy – Green</p> <p>As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.</p> <p>The application has reviewed the installation of various renewable technologies. The report concludes that VRF air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement.</p> <p>The solar array is estimated to produce around 4320 kWh/year of renewable electricity per year, equivalent to a reduction of 4.1% in emissions per year. The array of panels would be mounted on a roof area of 43 m², at a 30° angle, facing south.</p> <p>The communal VRF air source heat pump system will provide hot water, heating and cooling to the bedrooms through 4-pipe local fan coil units, rooftop VRF condensers that are connected to hydroboxes (these include buffer boxes to enable future connection to the DEN).</p> <p>Actions:</p> <ul style="list-style-type: none"> - Please provide some commentary on how the available roof space has been maximised to install solar PV. Has your feasibility shown that other roofs will not be viable / will they be used for other purposes? - What is the peak output of the PV array and assumed inverter capacity? 	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> - How will the solar energy be used on site (before surplus is exported onto the grid)? - Please identify on the plans where the external condenser units and hydroboxes will be located and how the units will be mitigated in terms of visual and noise impact. - What is the Seasonal Coefficient of Performance (SCOP), the Seasonal Performance Factor (SFP) and Seasonal Energy Efficiency ratio (SEER) of the ASHP? <p>Energy – Be Seen</p> <p>London Plan Policy SI2 requests all developments to ‘be seen’, to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies.</p> <ul style="list-style-type: none"> - Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: (https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform) <p>3. Carbon Offset Contribution</p> <p>A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built.</p> <ul style="list-style-type: none"> • Scenario 1: Connection to the DEN scenario (residual tCO₂ over 30 years) • Scenario 2: Heat pump (residual tCO₂ over 30 years) <p>Two carbon offset payments will be calculated. The carbon offset contribution for scenario 1 will be due at the commencement of development and the difference in the offset contribution between the first and second scenarios will be deferred for 10 years and indexed accordingly.</p> <ol style="list-style-type: none"> 1. Payment for the residual emissions in the DEN scenario (Scenario 1) would be due at commencement of development. 2. A deferred carbon offset contribution is calculated through the difference in the offset contribution: Scenario 2 – Scenario 1 = Deferred Payment. 3. If, after 10 years the development has not connected to the DEN, the deferred payment (+indexation) is due. 	

Stakeholder	Comment	Response															
	<p>4. If, after 10 years the development has connected to the DEN, the deferred payment would not be due but this amount would be available as a connection charge to the DEN.</p> <table border="1" data-bbox="412 284 1617 810"> <thead> <tr> <th data-bbox="412 284 633 432"></th> <th data-bbox="633 284 1090 432">Carbon Offsetting Contribution (Alternative Heating Strategy scenario; tCO₂)</th> <th data-bbox="1090 284 1617 432">Carbon Offsetting Contribution (Connection to DEN scenario; tCO₂)</th> </tr> </thead> <tbody> <tr> <td data-bbox="412 432 633 507">Shortfall to offset</td> <td data-bbox="633 432 1090 507">12.28</td> <td data-bbox="1090 432 1617 507">7.22</td> </tr> <tr> <td data-bbox="412 507 633 619">Carbon offset payment due for scenario</td> <td data-bbox="633 507 1090 619">12.28 x 30 x £95 = £34,998</td> <td data-bbox="1090 507 1617 619">7.22 x 30 x £95 = £20,577</td> </tr> <tr> <td data-bbox="412 619 1090 694">Carbon Offsetting Contribution payment due at commencement of development</td> <td data-bbox="633 619 1090 694"></td> <td data-bbox="1090 619 1617 694">£20,577</td> </tr> <tr> <td data-bbox="412 694 1090 810">Deferred Carbon Offsetting Contribution (+indexation) payment due if not connecting to the DEN</td> <td data-bbox="633 694 1090 810"></td> <td data-bbox="1090 694 1617 810">£34,998 - £20,577 = £14,421</td> </tr> </tbody> </table> <p>4. Overheating</p> <p>London Plan Policy S14 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.</p> <p>In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM52 and TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled 25 bedrooms under the London Weather Centre files.</p> <p>Due to the possible noise and air quality constraints of this site being adjacent to the High Road, the TM59 criteria for predominantly mechanically ventilated dwellings apply (assuming windows need to remain closed). However, the applicant has assumed that these spaces are predominantly naturally ventilated.</p> <p>Results are listed in the table below.</p>		Carbon Offsetting Contribution (Alternative Heating Strategy scenario; tCO ₂)	Carbon Offsetting Contribution (Connection to DEN scenario; tCO ₂)	Shortfall to offset	12.28	7.22	Carbon offset payment due for scenario	12.28 x 30 x £95 = £34,998	7.22 x 30 x £95 = £20,577	Carbon Offsetting Contribution payment due at commencement of development		£20,577	Deferred Carbon Offsetting Contribution (+indexation) payment due if not connecting to the DEN		£34,998 - £20,577 = £14,421	
	Carbon Offsetting Contribution (Alternative Heating Strategy scenario; tCO ₂)	Carbon Offsetting Contribution (Connection to DEN scenario; tCO ₂)															
Shortfall to offset	12.28	7.22															
Carbon offset payment due for scenario	12.28 x 30 x £95 = £34,998	7.22 x 30 x £95 = £20,577															
Carbon Offsetting Contribution payment due at commencement of development		£20,577															
Deferred Carbon Offsetting Contribution (+indexation) payment due if not connecting to the DEN		£34,998 - £20,577 = £14,421															

Stakeholder	Comment				Response
	Domestic: CIBSE TM59	Predominantly naturally ventilated	Predominantly mechanically ventilated	Number of corridors pass	
		Criterion A (<3% hours)	Criterion B for bedrooms (less than 33 hours)	Number of habitable rooms pass (<3% hours)	
	DSY1 2020s	20% fail	68% fail		
	DSY2 2020s	50% fail	100% fail		
	DSY3 2020s	60% fail	100% fail		
	DSY1 2050s	48% fail	100% fail		
	DSY2 2050s	90% fail	100% fail		
	DSY3 2050s	83% fail	100% fail		
	<p>The overheating assessment demonstrates that the spaces do not pass the overheating requirements for 2020s DSY1 without further overheating mitigation measures. The following measures are currently proposed:</p> <ul style="list-style-type: none"> - Natural ventilation <ul style="list-style-type: none"> o Block A (High Road): 40% openable sash windows 9am-8pm o Block A (rear): top hung 30° angle o Block B (top hung) 30° angle; (doors, side hung) 90° angle, 8am-8pm - Glazing g-value of 0.30 - Comfort cooling through a VRF system with local fan coil units <p>Other mitigation measures are recommended:</p> <ul style="list-style-type: none"> - Internal blinds - Night-time ventilation (where possible) 				

Stakeholder	Comment	Response
	<p>The submitted overheating strategy is not considered acceptable. The proposed condition will deal with the issues outstanding, i.e. that the cooling hierarchy has not been followed, no information about air quality, security or noise constraints and how this impacts window openings, and whether these spaces should be modelled as predominantly mechanically ventilated.</p> <p>5. Sustainability Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques.</p> <p><i>Non-Domestic BREEAM Requirement</i> Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.</p> <p>The applicant has prepared a BREEAM Pre-Assessment Report for the student accommodation and retail unit separately. Based on this report, a score of 57.1% is expected to be achieved, equivalent to 'Very Good' rating for the student accommodation. A score of 59.46% is expected for the retail unit, also equivalent to 'Very Good'.</p> <p>Actions:</p> <ul style="list-style-type: none"> - Targeting such a low score will risk not achieving 'Very Good' as a very minimum, and does not demonstrate the ambition to deliver a more sustainable development. <p><i>Urban Greening / Biodiversity</i> All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff.</p> <p>The Biodiversity Net Gain calculation shows a net gain (from 0)</p>	

Stakeholder	Comment	Response
	<p><i>Living roofs</i> All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5.</p> <p>The development is proposing amenity living roofs in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought.</p> <p>Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition.</p> <p><i>Whole Life-Cycle Carbon Assessments</i> Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.</p> <p>This application is not required to submit a full statement. No reference has been made to reducing whole-life carbon within the proposed development. The applicant is strongly encouraged to consider using low-carbon materials, sourced as local as possible.</p> <p><i>Circular Economy</i> Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.</p> <p>This application is not required to submit a full statement. No reference has been made to consider and integrate circular economy principles within the proposed development. The applicant is strongly encouraged to consider implementing circular economy principles, such as designing for disassembly and reuse.</p> <p>6. Planning Obligations Heads of Terms</p>	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages. - DEN connection (and associated obligations) - Heating strategy fall-back option if not connecting to the DEN <p>7. Planning Conditions</p> <p>To be secured (and amended following some clarifications above):</p> <p><u>Energy Strategy</u> <i>The development hereby approved shall be constructed in accordance with the Energy & Sustainability Strategy by P3R (dated 19 February 2024) delivering a minimum 86.5% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, a single point of connection for a future heat network, and solar photovoltaic (PV) array generating a minimum 4,320 kWh/year; and a minimum 15% improvement with a communal heat pump system.</i></p> <p><i>(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:</i></p> <ul style="list-style-type: none"> - Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy; - Confirmation of the necessary fabric efficiencies to achieve a minimum 10% reduction; - Improvement in the Fabric Energy Efficiency; - Methodology and calculation of the space heating demand and energy use intensity, demonstrating how the GLA benchmarks are being met; - Details to reduce thermal bridging; - Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures; - How the VRF heat pump system is compatible with the DEN; - Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit; 	

Stakeholder	Comment	Response
	<p>- 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); inverter capacity; and how the energy will be used on-site before exporting to the grid;</p> <p>- Specification of any additional equipment installed to reduce carbon emissions;</p> <p>- A metering strategy.</p> <p>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.</p> <p>(b) The solar PV arrays must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, 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, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate.</p> <p>(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.</p> <p>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.</p> <p><u>Overheating</u></p> <p>Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This assessment shall be based on the CIBSE TM52 Overheating Assessment by P3R (dated January 2024).</p> <p>This report shall include:</p> <p>- Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of</p>	

Stakeholder	Comment	Response
	<p><i>crime, noise and air quality issues are mitigated appropriately, and evidenced by the proposed location and specification of measures;</i></p> <ul style="list-style-type: none"> <i>- Modelling of mitigation measures required to pass current and future weather files to reduce the cooling demand, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;</i> <i>- Confirmation 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), setting out mitigation measures in line with the Cooling Hierarchy;</i> <i>- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.</i> <p><i>(b) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:</i></p> <ul style="list-style-type: none"> <i>- Openable windows;</i> <i>- Window g-values of 0.30 or better;</i> <i>- Mechanical ventilation;</i> <i>- Hot water pipes insulated to high standards.</i> <i>- Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.</i> <p><i>If the design is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.</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>BREEAM</i></u></p> <p><i>a) Prior to commencement on site for the relevant non-residential unit, a Design Stage Assessment and evidence that the relevant information has been submitted to the BRE for 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”. This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.</i></p>	

Stakeholder	Comment	Response
	<p>b) <i>Within 6 months of commencement on site, the Design Stage Accreditation Certificate must be submitted. 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>c) <i>Prior to occupation, the Post-Construction Stage Assessment and tool, and evidence that this has been submitted to BRE should be submitted for approval, confirming that the development has achieved a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”, subject to certification by BRE.</i></p> <p>d) <i>Within 3 months of 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>Reason: 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><u><i>Building User Guide</i></u> <i>Prior to occupation, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems for different heatwave scenarios. The Building User Guide should be easy to understand, and will be issued to any residential occupants before they move in, and should be kept online for residents to refer to easily.</i></p> <p><i>Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><u><i>Living roof</i></u></p>	

Stakeholder	Comment	Response
	<p><i>(a) Prior to the above ground commencement of development, details of the living roof must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:</i></p> <ul style="list-style-type: none"> <i>i) A roof plan identifying where the living roof will be located;</i> <i>ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);</i> <i>iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate</i> <i>iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays;</i> <i>v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with root ball of plugs 25cm³) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);</i> <i>vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</i> <i>vii) Management and maintenance plan, including frequency of watering arrangements.</i> <i>viii) A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;</i> <p><i>(b) Prior to the occupation of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of 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 roof 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</i></p>	

Stakeholder	Comment	Response
	<p><i>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>Conservation Officer</p>	<p><u>Site</u> the development site lies within the northern part of North Tottenham Conservation Area which is defined in the adopted Conservation Area Appraisal as an almost intact 19th century townscape incorporating notable surviving examples of earlier periods, while the areas immediately to the east and west of the High Road have changed dramatically. Despite several changes, the townscape of the High Road retains a high degree of historical continuity, maintaining a contained linear street pattern forming a sequence of linked spaces and sub spaces, and displays a notable variety and contrast in architectural styles and materials.</p> <p>The street width and alignment still follow the form established by the mid-19th century. There are good surviving examples of buildings dating from the 18th and 19th centuries including outstanding groups of Georgian houses and mid and late-Victorian shopping parades illustrating the changes to this building type in scale and style, together with examples of the inter-war style of the mid-20th century.</p> <p>The northern part of the Conservation Area, here considered as the best surviving townscape section of the High Road, contains some outstanding Georgian buildings, there is a good sequence of 18th and 19th century buildings, some listed, e.g. Nos. 819-821, an early-18th century pair, now rendered and with 19th- century shop fronts, and some locally listed. Key features of the conservation area that need to be preserved and enhanced include the historic linear continuity of buildings either side of the High Road, maintaining the character of the townscape and its sense of spatial sequence highlighted by the mix of Victorian and Georgian buildings that help to give the street its scale and sense of place.</p> <p>The section of the High Road between Brantwood Road and White Hart Lane, however, is the most complete part of the conservation area in terms of its surviving historic buildings and townscape form, retaining many Georgian and Victorian buildings with their consistency of scale, height, and frontage width. The linear high street can be split into a sequence of sub-spaces progressing from north to south.</p>	<p>The recommended conditions would enable officers to scrutinise detailed design and external material choices.</p>

Stakeholder	Comment	Response
	<p>Property at No. 807 was sensitively built to blend in with the mixed informal character of the west side of the High Road where the development site is adjoined to both sides by relatively well-preserved, locally listed properties dating from the mid-18th century with later shop fronts.</p> <p>Further to the south of the development site at Nos.797-799 stands a pair of grades II listed early C19 buildings with modern shop fronts on ground floor.</p> <p>Property at No. 807 is identified in the adopted Conservation Area Appraisal as a neutral contributor to the character and appearance of the Conservation Area, and historic OS map regression shows that an original building with coach entrance to rear courtyard was replaced between 1936 and 1956 with the current building.</p> <p>It is very likely that the building we see today was erected post-war at the very end of 1940's and its planning history shows that several alterations to the current building start as early as in 1950.</p> <p><u>Proposal</u></p> <p>It is proposed to demolish the existing building at No 807 and to erect a replacement building of up four storeys to include purpose-built student accommodation and flexible commercial, business and service uses, hard and soft landscaping, and associated works.</p> <p><u>Comments</u></p> <p>The proposed scheme is a revision of the approved redevelopment of the site as per planning consent HGY/2021/0441 and now includes a PBSA and mixed-use development of a very similar scale and massing as the approved scheme. The existing building at No 907 High Road forms part of the historic frontage of North Tottenham Conservation Area, here characterised by several locally listed buildings immediately flanking the development site, but No 807 is deemed to be a much altered and bland Victorian pastiche whose materiality quietly complements the historic frontage of the conservation area. The proposed scheme would replace the undesignated building at 807 High Road which dates from the late 1940s and would declutter and optimally develop its back land thus improving the quality of the conservation area through good design and a better use of its spaces.</p> <p>In the light of the architectural and landscape design quality achieved by the development proposal that has been sensitively developed and refined further to pre-application discussion, and in full consideration of the modest quality and contribution to the character of the</p>	

Stakeholder	Comment	Response
	<p>Conservation Area offered by the existing site at No 807, it is evident that the heritage and context led design approach that positively informed the approved scheme has been successfully applied also to this revised scheme aimed at complementing and unveiling the distinctive architectures which characterise this important stretch of the High Road within Conservation Area, where the development site stands just opposite the highly significant Georgian townhouses of Northumberland Terrace and being characterised by a high concentration of listed and locally listed buildings.</p> <p>Similarly to the approved scheme, the overall proportions, height, forms, and overall design of the proposed building fronting the high street acknowledge and positively respond to the surrounding heritage buildings and are here proposed as a convincingly harmonious and well-proportioned reinterpretation of a traditional townhouse that unveils and reinforces the original variety and established common features of the historic townscape of this part of the Conservation Area. The proposed materials adhere to the approved palette of the previously consented scheme and complement the established materiality of the surrounding conservation area with its listed and locally listed buildings.</p> <p>The development to the rear provides a more contemporary yet context led reinterpretation of the proportions, height forms and materiality of the conservation area and is integrated to the frontage building by means of a landscape design that delivers biodiversity enhancements and habitat and amenity value within the proposed development all contributing to raise the quality of the land to the rear of No 807. The proposed scheme would enhance the development site, would conserve the significance of the North Tottenham Conservation Area including the significance of its designated and non-designated heritage assets, and will also deliver significant public benefits. The proposed scheme is accordingly supported from the conservation perspective and detailed design of both proposed buildings and related podium, material specification and material samples should be submitted for approval by the local authority.</p>	
Design Officer	<p>The proposals are well designed and promise to be a polite insertion into the Conservation Area and High Road frontage, as well as providing much needed improved workspace, including an active frontage through a well designed shopfront, to the High Road and appropriate more private frontage to the Percival Court mews street. Above there will be a modest quantity of excellent quality specialist student accommodation, in a mix of small clusters above the high street and in the back of high street location. The students will all share a good podium level private outdoor amenity area, as well as equally good-sized indoor</p>	Support noted.

Stakeholder	Comment	Response
	<p>amenity providing animation and active frontage to Percival Court and a rooflight bringing in sun and daylight to the food preparation area. It should be noted that this student housing is designed to be subsidiary to the larger purpose built student accommodation complex a couple of doors up the road, where a wider range of facilities will be available.</p> <p>All student study-bedrooms are designed to have good space, daylight, outlook and privacy, without causing any harm to any neighbours, including the much-loved existing beer garden to the adjacent public house. Servicing, cycle storage and refuse storage, including access routes to them are all well designed to be functional, effective and not cause any disturbance. The design, form, massing, height, proportions, fenestration, materials and detailing to the proposal are all of high quality and appropriate to the context. Conditions should ensure high quality brickwork and roof covering as well as sound detailing to the shopfront, windows (especially cills and lintels), parapet and gable.</p>	
Drainage/LLFA	<p>Thank you for consulting us on the above planning application reference number HGY/2024/0692 for the Full planning application for the demolition of existing buildings and the erection of a replacement building of up four storeys to include purpose-built student accommodation (Sui Generis) and flexible commercial, business and service uses (Class E), hard and soft landscaping, and associated works at 807 High Road, Tottenham, London, N17 8ER.</p> <p>Having reviewed the applicant's submitted Flood Risk Assessment and Drainage Strategy Document reference number WIE20265-100-R-1-3-1-FRA dated February 2024 as prepared by Waterman Infrastructure & Environment Limited Consultant, we have following observations:</p> <p>1) As a part of the Full planning application, we do not consider Micro Drainage "Source Control" outputs as the correct assessment. Therefore, calculations are require including the Network Diagram confirming a full range of rainfall data for each return period provided by Micro drainage modelling or similar simulating storms through the drainage system, with results of critical storms, demonstrating that there is no surcharging of the system for the 1 in 1 year storm, no flooding of the site for 1 in 30 year storm and that any above ground flooding for 1 in 100 year storm is limited to areas designated and safe to flood, away from sensitive infrastructure or buildings. These storms should also include an allowance for climate change.</p>	This information is to be secured as part of a planning condition.

Stakeholder	Comment	Response
	<p>2) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method.</p> <p>3) Details of the Management and maintenance plan for the installed drainage system in perpetuity as per the above</p> <p>4) An evidence from the Thames Water confirming that the site has an agreed rate and point of discharge.</p> <p>5) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development</p>	
<p>LBH Environmental Health/Pollution</p>	<p><u>Re: Planning Application on HGY/2024/0692 at 807 High Road, Tottenham, London, N17 8ER</u></p> <p>Thank you for contacting the Carbon Management Team (Pollution) regarding the above application for the demolition of existing buildings and the erection of a replacement building of up four storeys to include purpose-built student accommodation (Sui Generis) and flexible commercial, business and service uses (Class E), hard and soft landscaping, and associated works at 807 High Road, Tottenham, London, N17 8ER and I would like to comment as follows.</p> <p>Having considered the relevant applicant submitted information including; Design and Access Statement dated February 2024; Preliminary Risk Assessment with reference WIE20262-102-R-1-2-1-PRA, prepared by Waterman Infrastructure & Environment Limited, dated February 2024 taking note of sections 4 (Previous Environmental Assessments and Consultations), 5 (Environmental Site Setting), 7 (Hazard Assessment and Initial Conceptual Site Model); Energy & Sustainability Statement with reference 1949/E&S Statement/Rev03 prepared by P3R Engineers Ltd., taking note of the proposal to either user Air Source Heat Pumps or connect to a future DEN along with the use of solar PV panels; Construction Management Plan with reference 15040 prepared by WPS Compliance Consulting Ltd., dated 12th February 2024 taking note of section 2 (CMP Strategy), 3 (Construction Planning), 6 (Vulnerable Receptors), 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 and informative are recommended should planning permission be granted.</p>	<p>The recommended planning conditions and informatives pick up on these issues.</p>

Stakeholder	Comment	Response
	<p>1. <u>Land Contamination</u> Before development commences other than for investigative work:</p> <ol style="list-style-type: none"> a. The risk assessment, refined Conceptual Model and Site Investigation Report alluded to in section 4 of the Preliminary Risk Assessment with reference WIE20262-102-R-1-2-1-PRA, prepared by Waterman Infrastructure & Environment Limited, dated February 2024 must be submitted to, and approved in writing by, the Local Planning Authority. b. 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. <p><u>Reason:</u> To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>2. <u>Unexpected Contamination</u> If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <p><u>Reasons:</u> To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.</p> <p>3. <u>NRMM</u></p> <ol style="list-style-type: none"> a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be 	

Stakeholder	Comment	Response
	<p>submitted to the Local Planning Authority prior to the commencement of any works on site.</p> <p>b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</p> <p>4. Demolition/Construction Environmental Management Plans</p> <p>a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst</p> <p>b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.</p> <p>The following applies to both Parts a and b above:</p> <p>a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).</p> <p>b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:</p> <p>i. A construction method statement which identifies the stages and details how works will be undertaken;</p> <p>ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;</p> <p>iii. Details of plant and machinery to be used during demolition/construction works;</p> <p>iv. Details of an Unexploded Ordnance Survey;</p> <p>v. Details of the waste management strategy;</p> <p>vi. Details of community engagement arrangements;</p> <p>vii. Details of any acoustic hoarding;</p>	

Stakeholder	Comment	Response
	<p>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</p> <p>ix. Details of external lighting; and,</p> <p>x. Details of any other standard environmental management and control measures to be implemented.</p> <p>c) The CLP will be in accordance with Transport for London’s Construction Logistics Plan Guidance (July 2017) and shall provide details on:</p> <p>i. Monitoring and joint working arrangements, where appropriate;</p> <p>ii. Site access and car parking arrangements;</p> <p>iii. Delivery booking systems;</p> <p>iv. Agreed routes to/from the Plot;</p> <p>v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and</p> <p>vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and</p> <p>vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.</p> <p>d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:</p> <p>i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;</p> <p>ii. Details confirming the Plot has been registered at http://nrmm.london;</p> <p>iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;</p> <p>iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);</p> <p>v. A Dust Risk Assessment for the works; and</p> <p>vi. Lorry Parking, in joint arrangement where appropriate.</p> <p>The development shall be carried out in accordance with the approved details. 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>	

Stakeholder	Comment	Response
	<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>Informative:</p> <ol style="list-style-type: none"> 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. 	
Transportation	<p>Description: An application has been received seeking planning permission to demolish the existing buildings and erect a four-storey purpose student accommodation (Sui Generis) and a commercial unit on the ground floor. The site would make provision for 1 on-site disabled parking bay located on Percival Court. Although, there is no proposal to support the space with a electric vehicle charging point. The student cycle parking provision would be 19 long-stay, 1 short-stay and the commercial 2 long-stay and 6-short-stay. The site is located in close proximity and shares vehicle access to HGY/2023/2306 which was granted planning permission to build 287 student rooms and separate commercial units. The site is currently used by Tottenham Hotspur for staff training and storage. The proposal sits near to the Peacock Industrial Estate. The vehicle access will be from Percival Court is privately owned and at narrowest part is only c.3m wide. The site is near Tottenham Hotspur Stadium.</p> <p>The site is located within the Tottenham North CPZ, which restricts parking to permit holders only Monday to Saturday between the hours of 0800 – 1830, with extended hours on events days and extra hours on Sundays and Public Holidays. The site fronts onto the High Road where there are pay by phone parking bays with a max stay of 2 hours and different operating times on event days, furthermore a loading bay which operates between 07:00-20:30 with a max stay of 40 mins. The proposal site PTAL rating ranges from 5 indicating that its access to public transport is very good when compared to London as a whole suggesting that there are opportunities for trips to be made to and from the site by modes other than the private car. The proposal site has convenient access to local shops, services, facilities and transport links. White Hart Lane Overground station is easily accessible from the location site with it only being approximately a 3min walk. The site is served by several bus routes on High Road and White Hart Lane.</p>	The recommended planning conditions and s106 Heads of Terms pick up on these issues. Travel plans were not sought on the extant scheme and are not sought here.

Stakeholder	Comment	Response
	<p>Unit mix Proposed: 25 x student rooms</p> <p>Commercial floorspace Class E commercial unit 192.53 sqm GEA</p> <p>Car parking It is acknowledged by LBH Transport Planning that there is no specific policy within the Published London Plan 2021 or local development policies for the provision of disabled bays for student accommodation. Nonetheless, The published London Plan 2021 Policy T6 Car parking 10.6.5 states that '<i>where no standard is given, the level of parking should be determined on a case-by-case basis taking into account of Policy T6 Car Parking, current and future PTAL and wider measures of public transport, walking and cycling connectivity</i>'. This policy will be utilised because no guidelines are specifically given to student accommodation within the London Plan 2021. This policy states that car free development should be a starting point for all proposals in places that are or planned in locations which are well connected to public transport, with developments elsewhere designed to provide the minimum necessary parking ('<i>car-lite</i>'). Taking into account the above policies and the sites car free nature, apart from the single provision of a student disabled parking bay, the development is in accordance with policy.</p> <p>The single disabled space for the development would be located on Percival Court, which is a privately owned road. No swept path drawings have been supplied with the application to demonstrate how a vehicle would be able to manoeuvre from the space to leave Percival Court in a forward gear, and this is especially concerning when considering that this road will be used for vehicle access to the disabled space for the site at 819-829 High Road, Tottenham and it is not known how this site will impact its ability to access it. This issue can be addressed through the submission of swept path drawings secured via a planning condition.</p> <p>Should the development be granted planning permission then LBH Transport Planning will require the developer/applicant to pay £4000 towards having the Traffic Management Order (TMO) amended which will prohibit students from acquiring a parking permit within the local CPZs. This will be secured via way of a S.106 obligation.</p> <p>Cycle parking</p>	

Stakeholder	Comment	Response
	<p>The proposal site cycle parking provision for the student accommodation will be based upon standards within the published London Plan 2021 Policy T5 Cycle which are 0.75 spaces per bedroom for long-stay and 1 space per 40 bedrooms for short-stay. Use Class A3 1 space per 175 sqm (GEA) long-stay and 1 space per 40 sqm (GEA) short-stay has been used to determine the number of cycle parking provision required for the commercial by the developer. In total the development would see the provision of 19 long-stay and 1 short-stay for the student accommodation and 2 long-stay and 6 short-stay for the commercial unit. LBH Transport Planning finds the student accommodation cycle provision to be satisfactory as it is in accordance with policy.</p> <p>Plans have been received detailing the locations of the on-site cycle parking for the long and short stay. Student long and short stay will be located within an internal location. 5% of spaces will be provided via Sheffield stands to support the use of larger bikes spaced 1.8m (centre to centre) and there will also another 20% Sheffield stands spaced 1.2m 9 (centre to centre). The rest of the space will be supplied via two-tier racks with an aisle width of 2.5m, which meets the minimum requirements of the LCDS. Commercial long-stay will be located within the building via Sheffield stand that can accommodate up two bikes and the short-stay will be provided for on Percival Court via 3 Sheffield stands. A pre-commencement planning condition requiring the applicant to submit details of cycle parking spaces in line with the London Plan and the London Cycle Design Standards (LCDS) which must be submitted and approved before development commences on site.</p> <p>Car clubs</p> <p>The developer/applicant will be required to enter into a S106 agreement with Haringey Council in order to provide car club facilities locally to the site and five years of membership with £100 credit for each resident. There is currently only one Zipcar vehicle located near to the development site within walking distance. As this development sits within an area which will see a number in student accommodations being brought forward, LBH Transport Planning will require the applicant/developer to work with a car club operator to provide extra bays within the vicinity of this site, which students could make use of. This is to ensure that there is sufficient supply within the immediate to satisfy future demand given the size of the future developments, including this one. Additionally, this will assist with reducing the rate of car ownership by students of this development and help offset any potential future car parking demands on local residential streets when the CPZ is not in operation. Therefore, the applicant/developer will be required to liaise with local car club operators who will advise on the local coverage and whether the applicant should be funding any new bays/cars in the locality to the site to meet</p>	

Stakeholder	Comment	Response
	<p>future demand from the development. The applicant will also be required to provide 5 years of car club membership for each residential unit, along with £100 driving credit for each resident.</p> <p>Service and delivery Some issues have been identified from the Transport Statement on the refuse collection for both the commercial and student elements of the development. Refuse vehicles are proposed to use the loading bay on the High Road to wait whilst collecting refuse bins from the site. It is unclear whether refuse bins will be left on the footway on the High Road ready to be collected for commercial use within the two-hour window in the morning and the three-hour window at night. It is further unclear on how they will be placed back inside of the bin storage location, which can only be accessed from Percival Court only and includes larger 1,100L bins. This storage would be beyond the 10m that Council operatives could travel from the vehicle to the bins. The student accommodation bins can be accessed via the High Road, though bins do need to be taken via multiple doorways to be retrieved/stored. This would be beyond what would be possible for the Council's operatives, and therefore, the bins may need to be taken out by on-site personnel to the collection point beforehand. A planning condition will require the submission of a waste management plan by the developer for approval.</p> <p>Electric vehicle charging The application submitted Transport Statement does not make any mention of electric vehicle charging point being provide for the disabled bay on Percival Court. To be in line with the published London Plan 2021 policy requirements, which are 20% active and passive for the rest the development will need provide 1 active electric charging point. This to be in accordance the published London Plan 2021 Policy T6.1 Residential Parking which requires that '<i>20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces</i>'. This issue can be addressed by way of a planning condition.</p> <p>Recommendation There are no highway objection to this proposal subject to the following conditions and s.106 obligations.</p> <p>Conditions</p> <p><u>1. Delivery and Servicing Plan and Waste Management</u> The owner shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The</p>	

Stakeholder	Comment	Response
	<p>service and delivery plan must also include a waste management plan which includes details of how refuse is to be collected from the site, the plan should be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying distances of a refuse truck on a waste collection day. It should demonstrate how the development will include the consolidation of deliveries and enable last mile delivery using cargo bikes.</p> <p>Details should be provided on how deliveries can take place without impacting on the public highway, the document should be produced in line with <u>TfL guidance</u>.</p> <p>The final DSP must be submitted at least 6 months before the site is occupied and must be reviewed annually in line with the travel plan for a period of 3 years unless otherwise agreed by the highway's authority.</p> <p>Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway and to comply with the TfL DSP guidance 2020</p> <p><u>2. Cycle Parking</u></p> <p>The applicant will be required to submit plans showing accessible; sheltered, and secure cycle parking for 19 long-stay, 1 short-stay student, 2 long-stay, and 6 short-stay commercial spaces for approval. The quantity must be in line with the London Plan 2021 T5 Cycle and the design must be in line with the London Cycle Design Standard. No Development (including demolition) shall take place on site until the details have been submitted and approved in writing by the Council.</p> <p>REASON: to be in accordance with the published London Plan 2021 Policy T5, and the cycle parking must be in line with the London Cycle Design Standards (LCDS).</p> <p><u>3. Electric Vehicle Charging</u></p> <p>Subject to a condition requiring the provision of 1 active electric vehicle charging point to serve the disabled bay on Percival Court from the onset.</p> <p>Reason: to be in accordance with published Haringey Council Development Management DPD, Chapter 5 Transport & Parking and the published London Plan 2021 Policy T6.1 Residential Parking.</p> <p><u>4. Disabled parking bays</u></p> <p>The applicant will be required to submit and provide plans showing 1 no. disabled persons parking bays and swept path drawings demonstrating how a vehicle can leave in a forward gear.</p> <p>REASON: to ensure the development is in accordance with the published London Plan 2021.</p>	

Stakeholder	Comment	Response
	<p><u>6. Car Parking Management Plan</u> The applicant will be required to provide a Car Parking Management Plan which must include details on the allocation and management of the single on-site car disabled parking space for the students.</p> <p>S.106 Obligations</p> <p><u>1. Car-Free Agreement</u> The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as "car free" and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose. Reason: To ensure that the development proposal is car-free, and any residual car parking demand generated by the development will not impact on existing residential amenity.</p> <p><u>2. Construction Logistics and Management Plan</u> The applicant/developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development, and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £15,000 (fifteen thousand pounds) to cover officer time required to administer and oversee the arrangements, and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and businesses. The plan shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved:</p> <ul style="list-style-type: none"> a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway. b) The estimated number and type of vehicles per day/week. c) Estimates for the number and type of parking suspensions that will be required. d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. e) The undertaking of a highway dilapidation survey before and after completion. 	

Stakeholder	Comment	Response
	<p>f) The implementation and use of the Construction Logistics and Community Safety (CLOCS) standard.</p> <p>g) The applicant will be required to contact LBH Highways to agree condition on surveys.</p> <p>h) Site logistics layout plan, including parking suspensions, turning movements, and closure of footways.</p> <p>i) Swept path drawings.</p> <p>Reason: to ensure that the impacts of the development proposal on the local highways network are minimised during construction, and to coordinate construction activities in key regeneration areas which will have increased construction activities.</p> <p><u>3. Car Club Membership</u> The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, including the provision of adequate car club bays and associated costs, and must include the provision of five years' free membership for all residents and £100 (one hundred pounds in credit) per year/per unit for the first 5 years. Reason: To enable residential and student occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.</p> <p><u>4. Student Accommodation Travel Plan</u> Within six (6) months of first occupation of the proposed new student accommodation development a Travel Plan for the approved residential uses shall have been submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan in order to maximise the use of public transport:</p> <p>a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years.</p> <p>b) Provision of welcome induction packs containing public transport and cycling/walking information to every new resident, along with a £200 voucher for active travel related equipment purchases.</p> <p>c) The applicants are required to pay a sum of, £2,000 (two thousand pounds) for five years £10,000 (ten thousand pounds) in total for the monitoring of the travel plan initiatives.</p>	

Stakeholder	Comment	Response
	<p>Reason: To enable students to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.</p> <p><u>5. Commercial Travel Plan</u> A commercial travel plan must be secured by the S.106 agreement and submitted 6 months before occupation. As part of the travel plan, the following measures must be included in order to maximise the use of public transport.</p> <ul style="list-style-type: none"> a) The applicant submits a Commercial Travel Plan for the commercial aspect of the Development and appoints a travel plan coordinator who must work in collaboration with the Facility Management Team to monitor the travel plan initiatives annually for a period of 5 years and must include the following measures: b) Provision of commercial induction packs containing public transport and cycling/walking information, available bus/rail/tube services, showers. Lockers, map and timetables to all new staff, travel pack to be approved by the Councils transportation planning team. c) The applicant will be required to provide, showers lockers and changing room facility for the commercial element of the development. d) The developer is required to pay a sum of £2,000 (two thousand pounds) per year per travel plan for monitoring of the travel plan for a period of 5 years. This must be secured by S.106 agreement. e) The first surveys should be completed 6 months post occupation or on 50% occupation whichever is sooner. <p>Reason: To promote travel by sustainable modes of transport in line with the London Plan 2021 and the Council's Local Plan SP7 and the Development Management DMPD Policy DM 32.</p>	
Tree Officer	<p>The previous arboricultural comments suffice – those were as follows:</p> <p>The tree is of limited value, having been subject to poor management previously. If the tree was retained and permission was granted for the new development, it would require pruning on an annual basis. In my opinion, it would be more appropriate to remove it and plant a more suitable species further away from the wall. Although I am unsure how you would get the tree owner to agree to this, would the developer fund the removal and replacement tree?</p>	Addressed in October 2020 report and recommended conditions.
Waste	<p><i>Comments dated 04/06/2024:</i> Below are the points we would like to include in any conditions for managing waste at this address.</p>	It is recommended that Waste Management

Stakeholder	Comment	Response																									
	<ul style="list-style-type: none"> • Ensure the bins are only presented at the permitted times • Bins are to be removed immediately after servicing • Any spillages / dumping by the bins is the responsibility of the building management team to clear <p><i>Comments dated 30/05/2024:</i> The volume of the additional but smaller bins is slightly less than the original proposal but the footprint is larger – see below:</p> <table border="1" data-bbox="412 475 1449 785"> <thead> <tr> <th>Bin size</th> <th>Litres</th> <th>Footprint cm</th> <th>Original proposal footprint / bins</th> <th>New footprint / bins</th> </tr> </thead> <tbody> <tr> <td>140</td> <td>140</td> <td>264</td> <td>1</td> <td>2</td> </tr> <tr> <td>240</td> <td>240</td> <td>429.2</td> <td></td> <td>13</td> </tr> <tr> <td>360</td> <td>360</td> <td>545</td> <td>10</td> <td>0</td> </tr> <tr> <td>Total</td> <td></td> <td></td> <td>5,714 cm</td> <td>6,107.6 cm</td> </tr> </tbody> </table> <p>We should definitely tighten up the condition as much as we can and ensure they stick to the times they present the bins. Can we require them to clear up spillages any dumping by the bins etc.?</p> <p><i>Comments dated 20/05/2024:</i> After further review of this application, and in light of recent discussions about waste storage and collections at this address, I've updated my comments in the text below. Please can this be used this in place of my initial submission.</p> <p>Case Ref: HGY/2024/0692</p> <p>Address: 807 High Road, Tottenham, London, N17 8ER</p> <p>My Comments (representation) The proposed scheme is a mixed-use development comprising of 45 purpose-built student studio flats and a commercial unit. Pre-application advice on the waste storage arrangements for both these property types was sought from Haringey's waste team by ARUP.</p>	Bin size	Litres	Footprint cm	Original proposal footprint / bins	New footprint / bins	140	140	264	1	2	240	240	429.2		13	360	360	545	10	0	Total			5,714 cm	6,107.6 cm	<p>Plans are secured by planning condition.</p>
Bin size	Litres	Footprint cm	Original proposal footprint / bins	New footprint / bins																							
140	140	264	1	2																							
240	240	429.2		13																							
360	360	545	10	0																							
Total			5,714 cm	6,107.6 cm																							

Stakeholder	Comment	Response
	<p>The proposals in the Design and Access statement and Transport and Waste Management statement reflect all the measures we would expect to see for managing and storing waste and recycling on site. However, the proposed collection arrangements raise some concerns particularly in this part of the Borough near the stadium. These are:</p> <ul style="list-style-type: none"> • There is a risk of obstruction / nuisance to pedestrians when collections take place with containers having to be wheeled out across the pavement to the collection vehicle. • If containers are moved to the designated collection point ahead of collection or not removed immediately after, there is a risk of obstruction or nuisance caused by the bins as they will be loose and open to misuse. • The need for collection crews and FM staff to liaise and coordinate collections could cause service disruption if there is a breakdown in communications. <p>More details about the proposed collection arrangements would be helpful, including any mitigations for the risks highlighted above.</p>	
EXTERNAL		
<p>Greater London Archaeology Advisory Service (GLAAS)</p>	<p>I note that you have had previous discussions with my colleague Adam Single regarding this site, and that on previous iterations of the scheme you have chosen to recommend archaeological evaluation by condition rather than pre-determination. If this is the route you wish to take in this instance, I would ask that the same two conditions that were applied to HGY/2021/0441 are applied here, so that the foundation design can be considered for its harm to heritage assets. This would give two archaeological conditions as follows:</p> <p><u>CONDITION 1:</u></p> <p>No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</p> <p>If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no</p>	<p>Discussed in the body of the October 2020 report (no change)</p>

Stakeholder	Comment	Response
	<p>demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p> <p>A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</p> <p>B. Where appropriate, details of a programme for delivering related positive public benefits.</p> <p>C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.</p> <p>Informative: <i>Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.</i></p> <p><u>CONDITION 2:</u></p> <p>No development shall take place within the proposed development site until the applicant has produced a detailed scheme showing the complete scope and arrangement of the foundation design and other below ground works, which have been submitted to and approved by the local planning authority.</p> <p>Reason: Heritage assets of archaeological interest survive on the site. The planning authority wishes to ensure that significant remains are not disturbed or damaged by foundation works but are, where appropriate, preserved <i>in situ</i>.</p> <p>Informative: <i>The development of this site is likely to damage heritage assets of archaeological interest. The applicant should therefore submit detailed foundation designs for approval.</i></p>	

Stakeholder	Comment	Response
	<p data-bbox="409 140 629 167">Full comments:</p> <p data-bbox="409 212 1494 244"><u>Recommend Pre-Determination Archaeological Assessment/Evaluation</u></p> <p data-bbox="409 285 1211 317">Thank you for your consultation received on 2024-03-14.</p> <p data-bbox="409 359 1760 464">The Greater London Archaeological Advisory Service (GLAAS) give advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.</p> <p data-bbox="409 505 969 537"><u>Assessment of Significance and Impact</u></p> <p data-bbox="409 579 1330 611">The planning application is not in an Archaeological Priority Area.</p> <p data-bbox="409 652 1744 799">I welcome the submitted archaeological assessment which notes that until 1824, the site was that of The Horns, a roadside inn with very early roots and possible royal connections. The site has certainly been occupied since at least the early seventeenth century and its historical significance could be beneficially articulated in any consented scheme.</p> <p data-bbox="409 841 1744 987">Because of the above, I recommend that any planning decision be informed by the results of archaeological field evaluation. This work should also feed into design and the public elements of an acceptable scheme, if the fieldwork results are significant. Archaeological evaluation through the floor of the existing building would be the appropriate technique.</p> <p data-bbox="409 1029 656 1061"><u>Planning Policies</u></p> <p data-bbox="409 1061 1756 1243">NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. A field evaluation may also be necessary.</p> <p data-bbox="409 1284 1744 1465">NPPF paragraphs 199 - 202 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.</p>	

Stakeholder	Comment	Response
	<p>NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement opportunities.</p> <p>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><u>Recommendations</u> Having 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>Because of this, I advise the applicant completes these studies to inform the application:</p> <p>Evaluation</p> <p>An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.</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>You can find more information on archaeology and planning in Greater London on our website.</p>	

Stakeholder	Comment	Response
	This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.	
Historic England	We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at https://historicengland.org.uk/advice/find/	Discussed in the body of the October 2020 report. No change.
Metropolitan Police (DOCO)	<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 and the Architects have made mention in the Design and Access Statement of design out crime and crime prevention. 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>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 was 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><u>Section 2 - Secured by Design Conditions and Informative:</u></p> <p>In light of the information provided, we request the following Conditions and Informative:</p>	See recommended planning condition. The recommended condition reflects that which was previously applied. It would still ensure secure by design accreditation would be achieved when the building is in operation.

Stakeholder	Comment	Response
	<p><u>Conditions:</u></p> <p>A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design Accreditation'. 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><u>Informative:</u></p> <p>The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p> <p><u>Section 3 - Conclusion:</u></p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p>	
National Gas Transmission	There are no National Gas assets affected in this area.	Noted.
Natural England	<p>SUMMARY OF NATURAL ENGLAND'S ADVICE</p> <p>NO OBJECTION</p>	Noted.

Stakeholder	Comment	Response
	<p>Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.</p> <p>Natural England’s generic advice on other natural environment issues is set out at Annex A (Natural England general advice).</p> <p>European sites Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development. To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out.</p> <p>Sites of Special Scientific Interest The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website</p> <p>Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A (Natural England general advice).</p>	
Thames Water	<p>Waste Comments The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. “The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide ‘working near our assets’ to ensure your workings are in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. https://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>	Informatives recommended.

Stakeholder	Comment	Response
	<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</p> <p>We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. 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>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.</p>	

Stakeholder	Comment	Response
	<p data-bbox="409 140 1621 209">https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes</p> <p data-bbox="409 252 663 280">Water Comments</p> <p data-bbox="409 288 1756 616">The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://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 data-bbox="409 659 1749 762">If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.</p> <p data-bbox="409 805 1738 1058">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>	
Transport for London	<p data-bbox="409 1106 611 1134"><u>Cycle Parking</u></p> <p data-bbox="409 1177 1733 1465">Following clarification on the total commercial floorspace proposed, 165.6sqm of GEA would require 1 long stay and 8 short stay spaces to be in line with policy T5 part A and minimum standards as outlined in table 10.2 of the London Plan. The site is proposing to provide 2 long stay and 6 short stay spaces. Given site constraints and to avoid further cluttering on the High Road (a footway that receives high footfall during events linked to adjacent Tottenham Stadium), we find this provision acceptable. The 6 spaces would be located to the rear of the development within Percival Court and therefore there should be clear signage present communicating the location of short stay spaces.</p>	The scheme addresses most of the issues raised. Others are addressed in the body of the report and by recommended planning conditions.

Stakeholder	Comment	Response
	<p>19 long stay and 1 short stay spaces are proposed for the PBSA which is in line with London Plan minimum standards. Short stay cycle parking for the PBSA is proposed to be incorporated within cycle store with access arranged by the student being visited which is deemed acceptable. Clear signage for the cycle parking should also be provided.</p> <p>In line with London Plan policy Part B, all cycle parking should be designed in accordance with London Cycling Design Standards (LCDS). The applicant has confirmed 5% of cycle spaces would be in the form of enlarged Sheffield stands to accommodate for adapted cycles which is welcomed. Remaining spaces would take the form of standard Sheffield stands (20%) and two-tiered spaces (75%) spaced at 500mm intervals (centre to centre) with the aisle widths of 2.5m in accordance with LCDS. LCDS recommends cyclists should not pass through more than two sets of doors to access cycle parking and that doors should be push pad operated or automatic to ensure accessibility, we encourage the applicant to incorporate these measures.</p> <p><u>Percival Court access and Disabled Car Parking</u></p> <p>It is understood the adjacent Printworks site would enhance the Percival court corridor to High Road through public realm and general landscaping works, making it more accessible and safer.</p> <p>Although the vehicular access point appears very narrow, swept paths drawings demonstrate larger blue badge vehicles can arrive safely and that there is enough space within Percival Court to perform manoeuvres to allow departures in forward gear.</p> <p>It is understood there would be a condition for the disabled car parking space to be equipped with electric vehicle charging infrastructure which is welcomed.</p> <p><u>Delivery and Servicing and Student Management</u></p> <p>A Delivery and Servicing Plan (DSP) is to be secured by condition which is welcomed. It should demonstrate the on-street loading bay to be used can accommodate for the increase demand this site would bring (noting the sites has an existing permission, HGY/2021/0441, for 9 homes and only needs to show material increase from this development).</p>	

Stakeholder	Comment	Response
	<p>Typically, a student management plan would be secured for PBSA land uses, however, it is understood the DSP would outline measures to minimise the impacts during moving in and out periods. This should include a plan of staggering arrivals and departures. The use of public transport should be encouraged, and the limited availability of car parking should be translated effectively to students prior to arrival.</p> <p><u>Construction</u></p> <p>It is noted a Construction Logistics Plan is to be secured by condition and that TfL would be consulted prior to condition discharge which is welcomed. The CLP should ensure the footway and carriageway on the A1010 High Road should not be blocked during the demolition and construction phases of the development. Temporary obstructions during these stages of the development should be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians obstruct the flow of traffic on the A1010 High Road.</p> <p>All vehicles should only park/stop at permitted locations and within the time periods permitted by existing on-street restrictions.</p> <p>Overall, TfL do not object to the development in principle and welcome that a CLP, DSP and electric vehicle charging infrastructure are all to be secured by condition.</p>	