Appendix 2 Consultation Responses from internal and external consultees

Stakeholder	Question/Comment	Response
INTERNAL: Carbon Management/ Energy & Sustainability	**Carbon Management Response 31/10/2024** In preparing this consultation response, we have reviewed: • Energy Statement prepared by Ensphere Group Ltd (revision 4 dated June 2024) • Sustainability Statement prepared by Ensphere Group Ltd (revision 7 dated Aug 2024) including BREEAM Pre-Assessment • Thermal Comfort Analysis prepared by Ensphere Group Ltd (revision 1 dated Sept 2024) • Building Lfe Cycle Assessment prepared by Ensphere Group Ltd (revision 1 dated Jun 2024) • Landscaping and UGF Report prepared by James Smith (dated July 2024) • GLA carbon emissions reporting spreadsheet • BRUKL Be Lean and Be Green worksheets • Existing and Proposed Drawing Sets prepared by Mata Architects (dated June 2024) • Mechanical Plant Report prepared by SVM (revision 1 dated Aug 2024) • Roof plan showing PV layout prepared by Mata Architects (dated Aug 2024) • ASHP and plant room drawing prepared by Mata Architects (dated Aug 2024) • PV Proposal by Zenergy (dated Sept 2024) • PV panel data sheet (Aiko 625W) • Solis Single Phase Inverters data sheet • Written Response by RPH Engineering (dated Aug 2024) • Relevant supporting documents. **Summary** The development achieves a reduction of 38% carbon dioxide emissions on site, which is supported in principle. Some clarifications must be provided with regard to the Energy Strategy, Overheating Strategy and PV provision. Appropriate planning conditions will be recommended once this information has been provided.	Noted conditions attached.

Energy Strategy

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.

The overall predicted reduction in CO_2 emissions for the development shows an improvement of approximately 38% in carbon emissions with SAP10.2 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 2.6 tonnes of CO_2 from a baseline of 6.8 tCO_2/year.

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: 7.7 tCO_2.

Non-residential (SAP10.2 emission factors)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2021 baseline	6.8		
Be Lean	5.5	1.2	18%
Be Clean	5.5	0	0%
Be Green	4.2	1.3	20%
Cumulative savings		2.6	38%
Carbon shortfall to offset (tCO_2)	4.2		
Carbon offset contribution	£95 x 30 years x 4.2 tCO_2/year = £11,970		
10% management fee	Plus 10% management fee: £11,970 x 10% = £1,197		

Actions:

- Applicant to confirm if all proposed floorspace are modelled as ‘heated’ including the atrium.

<table>
<tr><th>Stakeholder</th><th>Question/Comment</th><th>Response</th></tr>
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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.

<table>
<tr><th></th><th>Proposed Development</th><th>GLA Benchmark</th></tr>
<tr><td>Building type</td><td>Light Industrial and offices</td><td>All other non-residential</td></tr>
<tr><td>EUI</td><td>TBC</td><td>Meets/Does not meet GLA benchmark of 55 kWh/m^2/year</td></tr>
<tr><td>SHD</td><td>TBC</td><td>Meets/Does not meet GLA benchmark of 15 kWh/m^2/year</td></tr>
<tr><td>Methodology used</td><td>SBEM</td><td></td></tr>
</table>

Actions:

- GLA carbon emission reporting spreadsheet has not been prepared in accordance with GLA energy assessment guidance. The “EUI and Space Heating Demand” tab was not filled in. Applicant to submit revised spreadsheet.
- How does the proposed EUI perform against GLA benchmarks, i.e. at 55 kWh/m2/year?
- How does the proposed SHD perform against the GLA benchmark of 15 kWh/m2/year?

Energy – Lean
The applicant has proposed a saving of 1.2 tCO_2 in carbon emissions (18 %) through improved energy efficiency standards in key elements of the build. This goes beyond the minimum 15% reduction set in London Plan Policy SI2, so this is supported.

The following u-values, g-values and air tightness are proposed:

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Stakeholder	Question/Comment	Response
	<table><tr><td>Floor u-value</td><td>0.11 W/m^{2}K</td></tr><tr><td>External wall u-value</td><td>0.16 W/m^{2}K</td></tr><tr><td>Roof u-value</td><td>0.11 W/m^{2}K</td></tr><tr><td>Door u-value</td><td>1.40 W/m^{2}K</td></tr><tr><td>Window u-value</td><td>1.40 W/m^{2}K</td></tr><tr><td>G-value</td><td>0.40</td></tr><tr><td>Air permeability rate</td><td>3 m^3/hm^2 @ 50Pa</td></tr><tr><td>Ventilation strategy</td><td>Natural ventilation. Extract fans in WC and kitchen areas (SFP 0.3 W/l/s)</td></tr><tr><td>Waste Water Heat recovery</td><td>TBC</td></tr><tr><td>Thermal bridging</td><td>TBC</td></tr><tr><td>Low energy lighting</td><td>> 100 l/W</td></tr><tr><td>Heating system (efficiency / emitter)</td><td>ASHP</td></tr><tr><td>Thermal mass</td><td>TBC</td></tr></table> <u>Actions:</u> - Please confirm the U-value of the proposed glass blocks as shown on the ground floor elevations. - Please provide the U-value of the projecting window surrounds, and demonstrate that the thermal bridging will be minimised and there will be no condensation. - Applicant to provide the target maximum value of thermal bridging and set out how the scheme's thermal bridging will be reduced, particularly at the junctions where the external walls stagger vertically. - What is the construction of the building and what is the assumed thermal mass? - The notional building has been modelled without PV panels. Please confirm if this is according to NCM guidance and that the proposed heat pumps will meet 100% of the space heating demand in the actual building. If the heat pumps do not meet 100% of the space heating demand, an area of PV array to be calculated according to NCM guidance should be included in the notional building. - If the air tightness of the scheme is improved, mechanical ventilation with heat recovery could be proposed to further reduce heat losses. Overheating is dealt with in more detail below.	

Stakeholder	Question/Comment	Response
	Energy – Clean 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. The applicant is not proposing any Be Clean measures. Combined Heat and Power (CHP) plant would not be appropriate for this site. The site is not located in close proximity to any existing District Energy Networks (DEN), but it is located within approximately 450m to a potential district energy network. However it is not proposed to accommodate DEN as part of the energy strategy as the source of the heat from DEN is likely higher carbon than alternatives. But the site will be future-proofed to facilitate connection, subject to the supply of heat with a lower environmental impact than alternative on-site solutions. <u>Actions:</u> – Applicant to further clarify why the heat from DEN will be more carbon intensive than the alternative on-site solutions. Please liaise with the Council DEN team for the carbon values if required to support your clarification. – Please submit a site plan showing the future 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. This will be conditioned. **Energy – Green** 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.	

Stakeholder	Question/Comment	Response
	The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 1.3 tCO_2 (20%) reduction of emissions are proposed under Be Green measures. Policy SP4 requires a minimum reduction of 20% to be achieved from on-site renewable generation through the use of PVs alone. Currently the application has achieved 20% in total through the use of PV panels as well as ASHPs. Applicant should incorporate further PV panels to meet the minimum 20% reduction requirement. The solar array peak output would be 11.250 kWp, which is estimated to produce around 10,309 kWh/year of renewable electricity per year. A total of 18 625W panels would be mounted on two south facing pitched roofs. The communal air-to-water ASHP systems (min. SCOP TBC) will provide heating to the development through radiant heaters. This includes two ASHP units which provide approximately 60kW heating load. The Mechanical Plant Report has shown a requirement of an external space for ASHP at roof level with full height enclosure. However this has not been indicated on the proposed roof plan, it is unclear how the external plant space requirement and its enclosure will be integrated into the proposed design. The hot water of the development will be provided by local electric water heaters. <u>Actions:</u> - The proposed PV layout has shown only one row of PVs on each pitched roof. Please provide some commentary on how the available roof space has been maximised to install solar PV. Would there be a potential to install two rows of PVs on each pitched roof? - Please provide the amount of carbon saving in tCO_2/year as a result of the renewable electricity generated by PV panels. - How will the solar energy be used on site (before surplus is exported onto the grid)? - Applicant to ensure proposed roof should be light coloured to reduce solar heat gains and the improve efficiency of the solar panels.	

Stakeholder	Question/Comment	Response
	- Please indicate the external plant space onto roof plan and elevations; and provide the details of this full height enclosure in terms of visual and noise mitigation. - How much of the heating/hot water demand will be met by the proposed types of heat pumps? If this cannot be met fully, how will this be supplemented? - What is the Seasonal Coefficient of Performance (SCOP), the Seasonal Performance Factor (SFP) and Seasonal Energy Efficiency ratio (SEER) of the ASHP? - Please clarify the proposed use of hot water provided by local electric water heaters, e.g. for use in bathrooms and kitchens? **Energy – Be Seen** 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. The applicant should install metering equipment on site, with sub-metering by the non-residential units. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents/businesses. The applicant will undertake a programme of aftercare support as part of its handover process, which will also align with the BREEAM Ma05 credit requirements. An energy monitoring system with metering will also be installed to allow the collection of data. - Please confirm that sub-metering will be implemented for commercial units. - What are the unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters, battery storage? - 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)	

Carbon Offset Contribution

A carbon shortfall of 4.2 tCO_2/year remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years, plus 10% management fee.

Overheating

London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM52 with TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled all spaces under the London Weather Centre files.

16 iterations have been modelled following the cooling hierarchy:

- Iteration 1 is the baseline scenario.
- Iterations 2-8 have incorporated an increasing interventions of passive design measures and passive ventilation.
- Iterations 9-12 have incorporated mechanical ventilation mitigation strategy.
- Iterations 13-16 have examined the overheating risk by modelling using extreme weather files DSY 2 and 3 and future weather scenario (2050 DSY 1)

All spaces pass the overheating requirements for 2020s DSY1 in iteration 12. In order to pass this, the following measures will be built:

- Natural ventilation, with openable areas of 15% and opening angle of 10°
- Glazing g-value of 0.4
- Proposed architectural shading elements and top floor 1320mm deep overheating and fins at south facing elevation
- Open internal doors where security allows
- Mechanical ventilation and comfort cooling for the following rooms:

Space	Ventilation overheating mitigation solution in Iteration 12
00_Workshop	MVHR with 4ACH

Stakeholder	Question/Comment		Response
	00_Circulation / Reception area	MVHR with 4ACH	
	00_Office 1	Natural ventilation with openable windows; open internal door	
	00_Gym / Studio	MVHR with 4ACH	
	00_Office 2	MVHR with 2ACH	
	01_Offices 1	Natural ventilation with openable windows; open internal door	
	01_Offices 2	MVHR with 2ACH	
	02_Meeting room	Natural ventilation with openable windows; open internal door	
	02_Offices 1	MVHR with 2ACH	
	02_Offices 2	Natural ventilation with openable windows; open internal door	
	02_Offices 3	MVHR with 4ACH	
	02_Kithcen	MVHR with 4ACH	
	03_Canteen	Comfort cooling	
	03_Kitchen	Comfort cooling	
	03_Meeting room	Comfort cooling	

<table>
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The openable windows of the baseline scenario are modelled as top-hung openable windows with 100mm restrictors limiting the opening angle below 10°. However applicant has not explained why the windows cannot be fully openable. Potentially window restrictors are incorporated to mitigate the falling risk, however this issue can be resolved either by raising the sill height or integrating internal guards and this will allow the windows to be modelled as fully openable in the baseline scenario.

The Overheating Analysis has demonstrated through iterations 4 to 7 that increasing the window recess depth from 100mm to 500mm did not yield a significant impact on the number of rooms meeting the CIBSE TM52 criteria and the number of rooms passed or failed remained the same.

Results are listed in the table below.

<table>
<tr><th>Non-domestic:
CIBSE TM52</th><th>Number of habitable spaces that pass at least 2 out of 3 criteria
1: hours of exceedance
2: daily weighted exceedance
3: upper limit temperature</th></tr>
<tr><td>DSY1 2020s</td><td>Pass (iteration 12)</td></tr>
<tr><td>DSY2 2020s</td><td>Pass (iteration 14 – Comfort cooling to all spaces)</td></tr>
<tr><td>DSY3 2020s</td><td>Pass (iteration 15 - Comfort cooling to all spaces)</td></tr>
<tr><td>DSY1 2050s</td><td>Pass (iteration 16 - Comfort cooling to all spaces)</td></tr>
</table>

Proposed future mitigation measures include:
- Comfort cooling.

It has been proposed comfort cooling systems will be implemented as part of the base build to mitigate the risk of overheating in the future.

The proposed active cooling and the additional mechanical ventilation are not acceptable, further passive measures should be explored.

The submitted overheating strategy is not considered acceptable.

<u>Actions:</u>
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</table>

Stakeholder	Question/Comment	Response
	- Please justify why the windows cannot be modelled as fully openable in the baseline scenario. Please redo the overheating modelling where necessary. - Applicant must ensure all passive measures have been explored before the implementation of mechanical ventilation and comfort cooling. The following passive design measures should be further explored: • Internal blinds • 4ACH ventilation has been proposed in Reception in order to pass overheating analysis. Applicant should consider to reduce the area of rooflight above staircase atrium to minimize heat gain, improve the g-value of the rooflight, and /or incorporate opening mechanism for the rooflight to create stack effect. • Given the rooms on top floor have higher overheating risk, the U-values of the associated external walls and roof should be improved, especially the proposed external wall U-value is only 0.16 W/m2K. And potentially to incorporate opening mechanism for the north facing clerestory windows at top floor to create stack effect. - Please integrate the overheating mitigation measures such as MVHRs with the design information, as there is no mention of the use of MVHR in the proposed plans and elevations where indicative vents should be identified. - Please clarify where are 00_Office 1 and 00_Office 2, the proposed ground floor plan only has shown one office space. - Specify the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m^2 and MY/year? Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point / any renewable sources. - Confirm who will own the overheating risk when the building is occupied (not the residents). - This development should have a heatwave plan / building user guide to mitigate overheating risk for occupants. **<u>Sustainability</u>** Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, water consumption,	

Stakeholder	Question/Comment	Response
	flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design. The proposed sustainability measures are high-level and the following are included: - Proposed landscape scheme incorporates the use of native species or species of benefit to wildlife - Green roofs and green walls - Provision of bird and bat boxes - The development will aim for more than 95% by tonnage of demolition and construction waste to be diverted from landfill as per minimum. - All timber and timber-based products will be from FSC or equivalent source - 6 safe and dry cycle parking will be provided, with 4 additional external spaces at the rear and 4 spaces at the front of building for visitors. - 6 electric vehicle charging points will be provided. <u>Action:</u> - Please identify the locations and number of bird and bat boxes. - A target (%) for responsible sourced, low-impact materials used during construction. - Set out how any demolition materials can be reused. - Set out how water demand will be reduced, e.g. rainwater harvesting, grey water system. - Set out how surface water runoff will be reduced, that it will be separated from wastewater and not discharged into the sewer. **Non-Domestic BREEAM Requirement** 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. The applicant has prepared a BREEAM Pre-Assessment Report for the development. Based on this report, a score of 75.46 % is expected to be achieved, equivalent to 'Excellent" rating with a score of 11.21% as contingency. This is supported. <u>Actions:</u>	

Stakeholder	Question/Comment	Response
	- The Sustainability Report has indicated a very good rating will be targeted. However the BREEAM pre-assessment has indicated a total score of 75.46% which is equivalent to "Excellent" rating. Applicant to update their Sustainability Report to reflect this higher aspiration in BREEAM. **Urban Greening / Biodiversity** 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. The proposed development has achieved an Urban Greening Factor of 0.3 (with 0.2548 rounding up to 0.3), this has reached the minimum target 0.3 for commercial development. The applicant has not provided a calculation for Biodiversity Net Gain. <u>Actions:</u> - <u>Please provide the biodiversity net-gain calculation using the statutory biodiversity metric calculation tool.</u> It is recommended to read <u>this guidance</u> before using the tool. Or demonstrate that the development is exempted from BNG requirements. ***Living roofs*** All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. The development is proposing living roofs and walls 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	

Stakeholder	Question/Comment	Response
	plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition. ***Circular Economy*** 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. The principles used for this development are: - Designing for longevity, to protect vulnerable parts of the building from damage and exposed parts of the building from material degradation to reduce maintenance and operation costs for the end users. - Diversion of demolition and construction waste from landfill by converting elements and materials for alternative use. - Minimise operational waste and provide adequate space for recycling **Planning Conditions** To be secured (with detailed wording TBC) **Carbon Management Response 13/01/2025 [version with highlights]** In preparing this consultation response, we have reviewed: • Written Response to Carbon Management Comments by Ensphere Group dated 12/11/24 • P23-008 – 150 – Proposed Site Plan_Rev A • P23-008 – 204 – Proposed Roof Plan_Rev B • P23-008 – 222 – Proposed West Elevation_Rev A • P23-008 – 232 – Proposed Section CC * * Same drawings as submitted previously	

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Summary

The development achieves a reduction of 38% carbon dioxide emissions on site, which is supported in principle. Clarifications on PV provision and a revised Overheating Analysis with further overheating mitigations must be provided prior to determination. Planning conditions have been recommended to secure the benefits of the scheme with amendments expected subject to the clarification on PV provision and Overheating mitigation.

Energy Strategy

Applicant has confirmed all proposed floorspace has been modelled as “heated and occupied space”.

Energy Use Intensity (EUI) / Space Heating Demand (SHD)

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</table>

The proposed EUI and SHD values both slightly exceed the GLA benchmarks. However, it is acknowledged that EUI has included an estimation of unregulated electricity use which is difficult to accurately quantify the demand. Applicant is encouraged to aim achieving the GLA benchmark when developing the proposal at later detailed stage.

Energy – Lean

Applicant has confirmed the ASHP will supply 100% of the heating requirement, therefore their notional building has been modelled without PV panels in accordance with the NCM guidance.

Applicant has clarified the majority of the building will be ventilated naturally, MVHR will be included where necessary to ensure energy is used efficiently in cooler

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Stakeholder	Question/Comment	Response
	months, and for the implementation of comfort cooling to mitigate future overhearing risk. However, this is different to the notes in the Overheating Analysis where for some of the rooms MVHR is required as part of the mitigation measures. Further details of U-value of glass blocks, U-value and psi-value of the projecting window frame will be conditioned. <u>Actions:</u> - Applicant to clarify the provision of MVHR. **Energy – Clean** Correspondence with Energetik has been provided, this has shown that the future DEN extension while still several hundred meters from site is programmed to be completed by March 2026. As this is unlikely to be ready for connection when the proposed development is completed, therefore DEN connection is not considered at this stage. But the applicant has confirmed the site will be future-proofed to facilitate a connection if it offers a lower carbon solution the alternative on-site solution. Site plan showing proposed future connection, location of pipe, plant room layout and schematics will be conditioned. **Energy – Green** Applicant has clarified the overall emissions reduction is based on a PV output of 6,971 kWh, which is equivalent to approximately 0.9 tCO_2 annually. This will not achieve the requirement of minimum 20% reduction from on-site renewable energy generation. However, a separate PV report submitted has indicated a detailed PV proposal with 18 number of 625W panels would achieve an output of 11.250 kWp, which is equivalent to approximately 1.4 tCO2e annually. Based on a baseline emission of 6.8 tCO_2, this would represent a 21% reduction in carbon emissions therefore achieving the requirements of minimum 20% reduction from on-site renewable energy generation. The solar energy generated by the proposed PV panels will be utilised on-site to directly supply the building's electrical demand, including common areas, lighting, and mechanical systems for example. It is anticipated that an energy management system will be implemented to optimise the use of solar ensuring that the energy is prioritised for on-site consumption before being exported to the grid.	

Stakeholder	Question/Comment	Response
	The proposed heat pumps will meet the full space heating requirements, with energy modelling based on an ASHP system with a COP of 3.5 for heating and an EER of 5. <u>Actions:</u> – Applicant to revise the overall emissions and reductions at different stages to align with the details in the PV report. This should be provided prior to the determination. **Energy – Be Seen** The action items in the previous comments will be conditioned accordingly. **<u>Carbon Offset Contribution</u>** A carbon shortfall of 4.2 tCO_2/year remains subject to the applicant's submission of revised carbon reduction calculations. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years, plus 10% management fee. **<u>Overheating</u>** In response to our previous comments, applicant has provided further information: - The overheating analysis was modelled based on inward top-hung openable windows with 100mm restrictions aligning with anticipated health and safety requirements. - Internal blinds have not been modelled following Part O methodology, but likely to be implemented as part of the design. - Area of atrium rooflight cannot be reduced as it would compromise daylight access to second and third floors. - The proposed U-value of external wall is relatively good, decreasing it would increase heat retention and therefore worsening overheating risks on the top floor. - 00_Office 1 and 00_Office 2 areas are marked as storage on the plans. - Indicative cooling demand is 74.5 MJ/m2 and 109,403 MJ for the overall development annually. Cooling will be supplied by the ASHP system and current energy modelling is based on an indicative COP of 5. - The owner of the building will own the overheating risk when the building is occupied. A building user guide will be developed in accordance with BREEAM Man04 credit methodology.	

Stakeholder	Question/Comment	Response
	Actions: - Applicant to provide further details on how aligning with health and safety requirements will restrict the windows opening. As noted in our previous comments, if we assume window restrictors are incorporated potentially to mitigate the falling risk, this issue can then potentially be resolved either by raising the sill height or integrating internal guards. This will allow the windows to be modelled as fully openable in the baseline scenario, this can help to eliminate the need of active cooling or reduce the cooling demand. - It is acknowledged that the external wall U-value is lower than the notional building, but 0.16 W/m2K is only an average U-value. Lower U-value will indeed retain heat in winter team when the outer temperature is lower, however it will help to reduce the heat transmission in hot summer from the outside with higher temperature to the indoor with lower temperature and therefore reducing overheating risk. - Currently the proposal relies on comfort cooling for the top floor to mitigate overheating risk. Applicant needs to demonstrate all options of passive measures are exhausted such as the fabric efficiency before the incorporation of active cooling. Applicant to submit a revised overheating analysis to demonstrate either active cooling has been eliminated or cooling demand has been reduced as part of the planning conditions. **Sustainability** Applicant has provided the following further information: - Bat and bird boxes have been indicated on proposed site plan. Details, exact number and locations of wildlife boxes will be conditioned. - Best endeavours will be made to allow the scheme to align with GLA guidance of reusing/recycling at least 20% by value of materials. - To reduce surface water runoff, all surface water runoff will discharge into a below ground attenuation tank, this will then discharge into an existing surface water sewer. - SuDs report has made reference to rainwater harvesting as part of the strategy to reduce water demand. This will be conditioned.	

	Urban Greening / Biodiversity Applicant has stated the proposal is exempt from statutory BNG. It would fall under the de-minimise exemption, as the existing site is formed entirely of impermeable surfaces and there are no existing habitats on site. **<u>Planning Conditions</u>** The following conditions are recommended to secure the benefits of the scheme. The Energy Condition and Overheating are expected to be amended after applicant has further revised their Energy Statement and Overheating Analysis. <u>*Energy Strategy*</u> *The development hereby approved shall be constructed in accordance with the Energy Statement prepared by Ensphere Group (rev 4 dated June 2024) delivering a minimum 38% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 11.250 kWp solar photovoltaic (PV) array.* *(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:* - *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 18% reduction, and provide details of U-values of fabric buildings including glass-block and projecting window frames;* - *Details to reduce thermal bridging including the projecting window frame details;* - *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;* - *Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;* - *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*	

Stakeholder	Question/Comment	Response
	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; - *Specification of any additional equipment installed to reduce carbon emissions, if relevant;* - *A metering strategy.* *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.* *(b) The solar PV arrays and air source heat pumps 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. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.* *(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.* *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.* *<u>DEN Connection</u>* *Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:* • *Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);*	

Stakeholder	Question/Comment	Response
	• *Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.* • *Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;* • *A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;* • *Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;* • *Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;* • *Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;* • *Details of a future pipework route from the temporary boiler location to the plant room.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.* *<u>Energy Monitoring</u>* *No development shall take place beyond the superstructure of the development until a detailed scheme for energy monitoring has been submitted to and approved in writing by the Local Planning Authority. The details shall include details of suitable automatic meter reading devices for the monitoring of energy use and renewable/ low carbon energy generation. The*	

Stakeholder	Question/Comment	Response
	monitoring mechanisms approved in the monitoring strategy shall be made available for use prior to the first occupation of each building and the monitored data for each block shall be submitted to the Local Planning Authority, at daily intervals for a period of 5 years from final completion. *Within six months of first occupation of any dwellings, evidence shall be submitted in writing to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.* *REASON: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2021 Policy SI 2 and Local Plan Policy SP4 before construction works prohibit compliance.* *<u>Overheating</u>* *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 Thermal Comfort Analysis prepared by Ensphere Group Ltd (revision 1 dated Sept 2024)* *This report shall include:* - *Revised modelling of units modelled based on CIBSE TM52, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;* - *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 crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures;* - *Updated drawings showing MVHR, on plans and elevations, vent location, top floor mitigation to reduce / mitigate cooling demand, mitigation on allowing further window opening;* - *Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;*	

Stakeholder	Question/Comment	Response
	- *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;* - *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.* *(b) Prior to occupation of the development, details of internal blinds to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the blinds, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development, or replace the blinds with equivalent or better shading coefficient specifications.* *(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:* - *Natural ventilation, with openable areas of 15% and opening angle of 10°;* - *Glazing g-value of 0.4 of better;* - *Proposed architectural shading elements and top floor 1320mm deep overheating and fins at south facing elevation* - *Open internal doors where security allows* - *Mechanical ventilation* - *Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.* *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.* *<u>Sustainability Strategy</u>* *Prior to above ground commencement of development, details of the sustainability strategy shall be submitted to and approved by the Local Planning Authority. This shall include specifications, plans and sections that demonstrate sustainable design, layout, construction techniques and proposed measures to improve the sustainability of the scheme including but*	

Stakeholder	Question/Comment	Response
	not limited to sustainable transport, health and wellbeing, reduction of material use and waste, water consumption, and flood risk, drainage improvements, and biodiversity enhancement. *The report shall include:* - *Urban greening and biodiversity enhancement measures including number, specifications and locations of wildlife boxes;* - *Details on electric vehicles charging points, cycle parking facilities;* - *A target percentage for responsibly sourced, low-impact materials used during construction;* - *Details on how surface water runoff will be reduced and overall sustainable drainage strategy;* - *Climate Change mitigation measures to be considered for the external spaces and the impact of the increase in severity and frequency of weather events on the building structures.* *Reason: To ensure the development provides the maximum provision towards increasing the level of sustainability in line with London Plan (2021) policies G6, SI7 and Haringey Local Plan Policy SP4, DM21, DM25, and DM29.* *<u>Living roofs</u>* *(a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:* *i) A roof plan identifying where the living roofs will be located;* *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);* *iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate* *iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m^2 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*	

Stakeholder	Question/Comment	Response
	log piles / flat stones for invertebrates with a minimum footprint of 1m^2, rope coils, pebble mounds of water trays; *v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m^2) and density of plug plants planted (minimum 20/m^2 with root ball of plugs 25cm^3) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);* *vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and* *vii) Management and maintenance plan, including frequency of watering arrangements.* *(b) Prior to the occupation of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.* *Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.* *<u>Urban Greening Factor</u>* *Prior to completion of the construction work, an Urban Greening Factor calculation should be submitted to and approved by the Local Planning Authority demonstrating a target factor of 0.3 has been met through greening measures.* *Reason: To ensure that the development provides the maximum provision towards the urban greening of the local environment, creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.*	

Stakeholder	Question/Comment	Response
	<u>BREEAM</u> *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.* *b) 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.* *c) 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.* *d) Within 6 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.* *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.* *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.* **<u>Planning Obligations Heads of Terms</u>** - Be Seen commitment to uploading energy data - Energy Plan	

<table>
<tr><th>Stakeholder</th><th>Question/Comment</th><th>Response</th></tr>
<tr><td></td><td>
- Sustainability Review
- Estimated carbon offset contribution (and associated obligations) of £11,970 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages.
- Future DEN connection (and associated obligations)

Carbon Management Response 30/01/2025

In preparing this consultation response, we have reviewed:
- Energy Statement prepared by Ensphere Group Ltd (revision 6 dated Jan 2025)

<u>Summary</u>
The development achieves a reduction of 42% carbon dioxide emissions on site, which is supported in principle. Applicant has revised the PV provision in the Energy Statement and this has resulted in a higher carbon reduction, increasing it from 38% previously. This has also resulted in a lower estimated carbon offset contribution. It is noted that the final carbon offset contribution will be recalculated as part of the Energy Plan and Sustainability Review obligations.

One outstanding matter on overheating is expected to possible to resolve with the application prior to determination. Planning conditions have been amended to reflect the updated information and the outstanding matter on overheating.

<u>Energy Strategy</u>
Applicant has now updated their ES aligning with the PV output of 10,309 kWh/year as proposed in the PV Proposal by Zenergy (dated Sept 2024).

<table>
<tr><td colspan="4">Non-residential (SAP10.2 emission factors)</td></tr>
<tr><td></td><td>Total regulated emissions (Tonnes CO_2 / year)</td><td>CO_2 savings (Tonnes CO_2 / year)</td><td>Percentage savings (%)</td></tr>
<tr><td>Part L 2021 baseline</td><td>6.8</td><td></td><td></td></tr>
<tr><td>Be Lean</td><td>5.5</td><td>1.2</td><td>18%</td></tr>
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</table>

Stakeholder	Question/Comment	Response

Be Clean	5.5	0	0%
Be Green	3.9	1.6	24%
Cumulative savings		2.8	42%
Carbon shortfall to offset (tCO_2)	3.9		
Carbon offset contribution	£95 x 30 years x 3.9tCO_2/year = £11,175		
10% management fee	Plus 10% management fee: £11,175 x 10% = £1,118		

Carbon Offset Contribution

A carbon shortfall of 3.9 tCO_2/year remains subject to the applicant's submission of revised carbon reduction calculations. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years, plus 10% management fee.

Overheating (in green for amendment made on 03/02/2025)

~~To address our comment, the applicant has explained in a correspondence that they will explore the feasibility of fully openable windows as additional passive measure to mitigate overeating risks, this is supported.~~

~~A revised Overheating Analysis is required to confirm the ventilation strategy to mitigate overheating risk. It should also include the assessment of how additional natural ventilation can be incorporated through adding internal /external guarding or raising the proposed window sill height.~~

~~This is expected that the issue of ventilation strategy will be resolved prior to determination, we hope it will be dealt with through design changes and reflected on the proposed design accordingly. However, it is also included in the condition.~~

The applicant has confirmed in a correspondence that they will incorporate openable windows as additional passive measure to mitigate overeating risks, this is supported.

A revised Overheating Analysis is required to include the details of the additional natural ventilation provided by incorporating openable windows. This will be conditioned.

Stakeholder	Question/Comment	Response
	<u>Planning Conditions</u> The following conditions are recommended to secure the benefits of the scheme – the amended wording has been marked by the text in blue (and in green for amendment made on 03/02/2025) and any removed wording with ~~strike through.~~ The Sustainability Condition can be removed as this is already covered by the BREEAM condition. Some of the information in the DEN connection condition can be reduced. *<u>Energy Strategy</u>* *The development hereby approved shall be constructed in accordance with the Energy Statement prepared by Ensphere Group (rev 6 dated Jan 2025) delivering a minimum 42% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 11.250 kWp solar photovoltaic (PV) array.* *(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:* - *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 18% reduction, and provide details of U-values of fabric buildings including glass-block and projecting window frames;* - *Details to reduce thermal bridging including the projecting window frame details;* - *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;* - *Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;* - *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*	

Stakeholder	Question/Comment	Response
	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; - *Specification of any additional equipment installed to reduce carbon emissions, if relevant;* - *A metering strategy.* *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.* *(b) The solar PV arrays and air source heat pumps 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. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.* *(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.* *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.* *<u>DEN Connection</u>* *Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:* • ~~*Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);*~~	

Stakeholder	Question/Comment	Response
	~~• *Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.*~~ ~~• *Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;*~~ • *A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;* • *Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;* • *Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;* • *Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;* • *Details of a future pipework route from the temporary boiler location to the plant room.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.* *<u>Overheating</u>* *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*	

Stakeholder	Question/Comment	Response
	on the Thermal Comfort Analysis prepared by Ensphere Group Ltd (revision 1 dated Sept 2024). *This report shall include:* - *Revised modelling of units modelled based on CIBSE TM52, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;* - *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 crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures;* - *Ventilation strategy including the details of additional natural ventilation to be provided through the incorporation of openable windows;* - *Updated drawings showing MVHR, on plans and elevations, vent location, top floor mitigation to reduce / mitigate cooling demand, mitigation on allowing further window opening;* - *Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;* - *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;* - *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.* *(b) Prior to occupation of the development, details of internal blinds to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the blinds, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development, or replace the blinds with equivalent or better shading coefficient specifications.* *(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:* - *Natural ventilation, with openable areas of 15% and opening angle of 10°;*	

Stakeholder	Question/Comment	Response
	- *Glazing g-value of 0.4 of better;* - *Proposed architectural shading elements and top floor 1320mm deep overheating and fins at south facing elevation* - *Open internal doors where security allows* - *Mechanical ventilation* - *Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.* *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.* ~~*Sustainability Strategy*~~ ~~*Prior to above ground commencement of development, details of the sustainability strategy shall be submitted to and approved by the Local Planning Authority. This shall include specifications, plans and sections that demonstrate sustainable design, layout, construction techniques and proposed measures to improve the sustainability of the scheme including but not limited to sustainable transport, health and wellbeing, reduction of material use and waste, water consumption, and flood risk, drainage improvements, and biodiversity enhancement.*~~ ~~*The report shall include:*~~ - ~~*Urban greening and biodiversity enhancement measures including number, specifications and locations of wildlife boxes;*~~ - ~~*Details on electric vehicles charging points, cycle parking facilities;*~~ - ~~*A target percentage for responsibly sourced, low-impact materials used during construction;*~~ - ~~*Details on how surface water runoff will be reduced and overall sustainable drainage strategy;*~~	

Stakeholder	Question/Comment	Response
	~~- Climate Change mitigation measures to be considered for the external spaces and the impact of the increase in severity and frequency of weather events on the building structures.~~ ~~Reason: To ensure the development provides the maximum provision towards increasing the level of sustainability in line with London Plan (2021) policies G6, SI7 and Haringey Local Plan Policy SP4, DM21, DM25, and DM29.~~	
LBH Drainage	Thank you for consulting us on the above planning application reference number HGY/2024/1798 for Demolition of the existing industrial buildings and the erection of a new four-storey building of Use Class B2 with ancillary offices and an external scaffolding storage yard (Use Class B8) with associated parking and landscaping at International House, Tariff Road, Tottenham, London, N17 0DY. Having reviewed the applicant's submitted Floor Risk Assessment and SuDS Report document reference number C3251-R1-REV-A dated May 2024 as prepared by Nimbus Engineering Consultant, we are generally content with the overall strategy and methodology used and as mentioned within the above Flood Risk Assessment and SuDS report, subject to following planning condition to be implemented with regards to the Surface water Drainage Strategy : Surface Water Drainage condition No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate: a. As a part of the Full planning application, we would like to see the network calculations confirming a full range of rainfall data for each return period for 7 days 24 hours NOT 1 day (24 Hours) 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. Reason: To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter.	Noted. Condition attached.

Stakeholder	Question/Comment	Response
INTERNAL: WASTE	Thank you for inviting the waste team to comment on this planning application for demolition of the existing industrial buildings and the erection of a new four-storey building of Use Class B2 with ancillary offices and an external scaffolding storage yard with associated parking and landscaping. Haringey's waste supplementary planning guidance only covers residential waste. Any Commercial enterprise must arrangement a scheduled waste collection with a Commercial Waste Contractor. The waste management plan outlines the proposed waste and recycling storage provision. I would also refer the applicant to the forthcoming changes in legislation with regards to business recycling requirements and the separation of recyclables - https://businessofrecycling.wrap.org.uk/recyclingguide/why-your-business-needs-to-recycle/how-to-comply-with-the-new-business-recyclinglegislation The business owner (s) will need to ensure that they have a cleansing schedule in place and that all waste is always contained. Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.	Noted. Condition attached.
INTERNAL: CARBON MANAGEMENT TEAM (POLLUTION)	Having considered the applicant submitted information including: Design and Access Statement; Energy Statement with reference 24-E043-003 prepared by Ensphere Group Ltd., dated June 2024 taking note of the proposal to install Air Source Heat Pumps and Roof mounted PV Panels; Phase 1 Contaminated Land Assessment with reference 83111R1 prepared by GeoSmart Information Ltd., dated August 2024; Air Quality Assessment with reference P7478-R1-V1 prepared by NoiseAir Ltd., dated 14 June 2024 taken note of section 4 (Baseline), 5 (Assessment) and 6 (Mitigation and Residual Effects); Outline construction Logistics Plan with reference 2024/7655/CLP05 prepared by RGP Consulting Engineers Ltd, dated 20 June 2024, taking note of section 3 (Construction Programme and Methodology), 4 (Vehicle Routing and Access), 5 (Strategies to Reduce Impact), 6 (Implementing, Monitoring and Updating), Please be advised that 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. 1. Unexpected Contamination If, during development, contamination not previously identified is found to be present at the site then no further development (unless	Noted. Conditions added.

Stakeholder	Question/Comment	Response
	otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved. Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework. 2. NRMM a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both 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 submitted to the Local Planning Authority prior to the commencement of any works on site. b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion. Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ **3.** Demolition/Construction Environmental Management Plans a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and	

Stakeholder	Question/Comment	Response
	approved in writing by the local planning authority. The following applies to both Parts a and b above: a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP). b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include: i. A construction method statement which identifies the stages and details how works will be undertaken; ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding; viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance); ix. Details of external lighting; and, x. Details of any other standard environmental management and control measures to be implemented. c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on: i. Monitoring and joint working arrangements, where appropriate; ii. Site access and car parking arrangements; iii. Delivery booking systems; iv. Agreed routes to/from the Plot; v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching. d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include: i. Mitigation measures to manage and minimise demolition/construction dust emissions during works; ii. Details confirming the Plot has been registered at http://nrmm.london; iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery	

Stakeholder	Question/Comment	Response
	should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection); v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate. 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. Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality. Informative: 1. Prior to refurbishment 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.	
INTERNAL: Transportation	<u>Development proposals</u> The building at this site is currently configured as a part 2 storey/part 1 storey building with a floor area of 929 sqm. It has been in use for employment purposes. It is proposed to demolish the existing building at the site and construct a new larger 4 storey building on part of the site and enable provision of 12 car parking spaces plus a parking area for 8 scaffolding trucks to the rear of the site, along with an open storage area. It appears it is intended to retain the existing highway access unaltered. Cycle parking will also be provided close to the site access. In terms of the numbers of employees that will work/be based there, the applicant has detailed	Noted and conditions attached.

Stakeholder	Question/Comment	Response
	within their Transport Addendum that initially 33 will work from the site (including 8 office staff) and this is expected to increase to 43 in total. <u>Location and access</u> This site is located to the western side of Tariff Road, roughly midpoint between the junctions of Tariff Road with Brantwood Road to the north and Northumberland Park to the south. The site has a PTAL value of 4, considered 'good' access to public transport services. 5 different bus services are accessible within 5 to 8 minutes walk of the site, White Hart Lane Overground station is a 12 minute walk away, and Northumberland Park National Rail Station is an 11 minute walk away. It is also located within the Tottenham Event Day CPZ, which operates on match days and evenings when there are games or concerts/other events at the Tottenham Hotspur Stadium. <u>Transportation considerations</u> A Transportation Assessment accompanies the application. The key transportation issues are discussed below. <u>Location and access</u> This site is located to the western side of Tariff Road, roughly midpoint between the junctions of Tariff Road with Brantwood Road to the north and Northumberland Park to the south. The site has a PTAL value of 4, considered 'good' access to public transport services. 5 different bus services are accessible within 5 to 8 minutes' walk of the site, White Hart Lane Overground station is a 12 minute walk away, and Northumberland Park National Rail Station is an 11 minute walk away. It is also located within the Tottenham Event Day CPZ, which operates on match days and evenings when there are games or concerts/other events at the Tottenham Hotspur Stadium. <u>Site access arrangements</u>	

Stakeholder	Question/Comment	Response
	It is intended to retain the existing site access off Tariff Road for vehicles. Pedestrians will access off the footway to Tariff Road at a new pedestrian access at the eastern edge of the site. Access control gates will be used. Access for cyclists can be via the main access gates or direct from the Tariff Road footway for the external visitor cycle parking. A 1.5m wide internal demarcated pedestrian walkway is included within the site to delineate pedestrians from parking and manoeuvring vehicles. Full details of the operation of the main vehicle access gates will be required, including hours of opening, breakdown arrangements, to ensure that vehicles do not wait unnecessarily in the highway to access. This can be conditioned. Swept path plots submitted do appear to demonstrate the vehicles expect to access and park/dwell at the site can do so via the existing access and within the existing highway arrangements on street. Although the highway access is not proposed for any physical changes the applicant may well need to carryout works to remedy any construction related damage to the public highway relating to the demolition/construction and build out/fit out of the development. <u>Trip generation</u> A combined office/B2 trip generation has been provided, is below;	

Stakeholder	Question/Comment	Response

Mode of Travel	AM Peak Hour			PM Peak Hour			Total Daily		
	Arr.	Dep.	2-way	Arr.	Dep.	2-way	Arr.	Dep.	2-way
Total Vehicles	*8*	*1*	*9*	*1*	*8*	*9*	*37*	*37*	*74*
Cyclists	*2*	*0*	*2*	*0*	*1*	*1*	*4*	*4*	*8*
Pedestrians	*1*	*0*	*1*	*0*	*2*	*2*	*15*	*15*	*30*
Public Transport	*10*	*0*	*10*	*0*	*11*	*11*	*31*	*31*	*62*
Total Trips	**21**	**1**	**22**	**1**	**22**	**23**	**87**	**87**	**174**

Multi-Modal Trip Generation (1,330sqm – Proposed Development)

This shows peak hours with 22/23 trips in total and 174 over a full day. The most recent use of the site (which is now unused) was for a bath manufacturer, and the TA includes a comparative trip generation, which is below;

Mode of Travel	AM Peak Hour			PM Peak Hour			Total Daily		
	Arr.	Dep.	2-way	Arr.	Dep.	2-way	Arr.	Dep.	2-way
Total Vehicles	*2*	*0*	*2*	*0*	*2*	*2*	*21*	*17*	*37*
Cyclists	*0*	*0*	*0*	*0*	*0*	*0*	*1*	*1*	*2*
Pedestrians	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*
Public Transport	*0*	*0*	*0*	*1*	*1*	*3*	*7*	*9*	*16*
Total Trips	**2**	**0**	**2**	**1**	**3**	**5**	**27**	**27**	**55**

Multi-Modal Trip Generation (928sqm – Former permited use)

As can be seen there will be a predicted increase in trips, however it is considered that this will be of no issue with respect to public highway and public transport capacities and networks.

<u>Vehicle parking on site</u>

Stakeholder	Question/Comment	Response
	8 no. 9m long scaffolding lorries will operate from the site, these will have a tandem parking arrangement, with four banks of two spaces, they will be loaded during afternoons for morning departures out on site. It is understood these will leave the site in 'space order' so the tandem arrangement should not cause additional manoeuvring beyond access and egress. In addition to this there will be 12 car parking spaces. There are no specific standards for B2 in the London Plan, which details parking provision should be derived on a case by case basis. The trip generation for the employment floorspace predicts 8 or 9 vehicle arrivals and departures in the peak periods and 37 arrivals/departures over a day. This would indicate that the proposed on site parking would cater for all demands generated hence there should be no additional on street demands generated that will occupy on street bays. This is assumed to include employee vehicles and delivery and service vehicles. The predicted mode share for trips to the site references the person vehicle mode share at 42%, so for 43 employees the 12 spaces should accommodate all demands on site. 6 of the 12 parking bays will be actively equipped for electric vehicle charging. There is no specific London Plan proportion or numerical requirement for electric vehicle charging for B2 developments. The applicant has now revised their car parking arrangements to include two blue badge bays. <u>Cycle parking</u> The London Plan standards require a minimum of 1 space per 500 sqm for long stay and 1 short stay space per 1000 sqm. The applicant proposes in excess of this minimum. However, there is some ambiguity over the proposed short stay arrangements. The Design and Access statement shows two diagonally placed Sheffield Stands for the visitor cycle parking, which appear to be on hardstanding adjacent to the footway (and within the applicant's site). There are other details within scheme drawings and the swept path plots for this location which appear to show 4 cycles at a right angle to the Tariff Road Footway although the drawing is misleading. Drawings also show 4 internally located Sheffield Stand spaces on two stands,	

Stakeholder	Question/Comment	Response
	located within the site adjacent to the end of the car parking spaces. If these are intended to be long stay spaces, they have no weather protection. The cycle parking arrangements need clarification and can be addressed via a pre commencement condition for the applicant to provide all cycle parking details, demonstrating adherence to the London Cycles Design Standards as produced by TfL. For clarity all long stay cycle parking should have sufficient security and weather protection, and all cycle parking should be accessed from and stored within the site. <u>Delivery and servicing, waste and recycling storage and collection arrangements</u> The TA references the majority of delivery and servicing vehicles being able to be accommodated within the site, with vehicles dwelling in the manoeuvring area behind the scaffolding lorry bays or alternatively using any available parking spaces. There's no breakdown of the number of delivery and servicing trips as they are included within the overall trip generation for the site, but it is acknowledged that during the workday there is likely to be space within the site when Scaffold Lorries are away. Smaller vans and cars making deliveries and the like will be able to park on street if spaces are available as well. A delivery and Service Plan should be provided to clarify the numbers of delivery and service trips generated and clarify arrangements for parking and management of arrivals and departures for the different sizes of vehicles attending. This can be covered by condition. <u>Travel Plan</u> A draft Travel Plan is included within the submission. The scope and contents for this are fine. It is noted that there are year 3 and year 5 targets for reducing single occupancy vehicle trips by 5% and 10%, with corresponding increases in active mode trips of 5% and 10%. In principle these are acceptable however will be able to be reviewed upon the first post occupancy travel survey. The Travel Plan should look at car parking provision over time with respect to its actual usage and need. As there are no fixed maximum standards in the London Plan this should be a draft done to remedy any overprovision over time.	

Stakeholder	Question/Comment	Response
	There will be a S106 obligation to develop the travel plan and for the Council Officer time for ongoing review and liaison with the travel plan co-ordinator, this will be £15,000 in total assuming a 5 year travel plan period. <u>Healthy Streets/ATZ assessment</u> This section of the TA reviewed routes to and from the site. The accident data review did not identify any KSI situations on Tariff Road or at the junctions used to access Tariff Road. Otherwise the assessment did identify that poor quality footways are in the locality of the site and that in some areas foliage needs to be trimmed where overhanging. <u>Construction Logistics Plan</u> Given the scale of this development, and the associated need for demolition and construction of a new four storey building, a Construction Logistics Plan will be required, for approval prior to commencement of the works. This is to ensure that potential impacts on adjacent neighbours in this industrial area and the safe and smooth operation of the highway are managed and mitigated. The document will need to include information on the programme and works duration, the numbers and sizes of construction vehicles attending site in a daily/weekly basis, the means of managing construction vehicles to ensure peak periods are avoided and no vehicles wait on the public Highway. Details of plant and materials storage will be required, and the applicant will also need to liaise with the Council's Network Managers with respect to any temporary arrangements on the highway such as suspended parking bays and the like. For officer oversight of the construction period, including assessment of submitted plans, visits to site, and dealing with all operational issues on the public highway, a Construction Logistics Plan monitoring fee of £15,000 will be required which will be included within the S106. <u>Summary</u> This application is for redevelopment of the light industrial site at International House in Tariff Road, to provide a bigger B2/B8 building plus associated lorry, car and cycle parking. The access arrangements off the public highway will remain as existing, and on-site operational lorry parking will cater for 8 No. scaffolding lorries. A gated access will be provided, and full details of the management arrangements of this to ensure vehicles do not wait or stack in the	

Stakeholder	Question/Comment	Response
	highway will be required, which can be covered by pre commencement condition. There will also be 12 No. car parking spaces for staff and delivery/service vehicles, including two blue badge bays. 6 of these will have active vehicle charging equipment provided. With regards trip generation from the site there is expected to be an increase compared to the existing site set up however this is not expected to be problematical with respect to capacities on the public highway and public transport systems. The off street parking should cater for all employee and the majority of delivery and service vehicle demands however the Travel Plan process can monitor usage and site requirements over time. Cycle parking to meet/exceed the numerical requirements of the London Plan is included however there is some ambiguity over exact arrangements, which can be clarified via a pre commencement condition. The development will include a Travel Plan for which a Monitoring fee of £15,000 will be required (£3000 per year), and in addition to this a detailed Construction Logistics Plan will be required to manage the demolition and construction of the redevelopment to minimise and mitigate impacts on the public highway and on adjacent neighbours. A monitoring fee of £15,00 will also be required for this as well. **Recommendation** There are no highway objections to this proposal subject to the following conditions, S.106 and S.278 obligations. **Conditions** <u>1. Cycle Parking</u> The applicant will be required to submit plans showing accessible; sheltered, and secure cycle parking for 14 long-stay and 4 short-stay cycle parking 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.	

Stakeholder	Question/Comment	Response
	REASON: to be in accordance with the published London Plan 2021 Policy T5 Cycle, and London Cycle Design Standards (LCDS). 2. Delivery and Servicing Plan and Waste Management 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 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 distance 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. Details should be provided on how deliveries can take place without impacting on the public highway, the document should be produced in line with TfL guidance. 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. 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 3. Access gate arrangements Prior to occupation of the development, full details of the proposed arrangements for the access control, opening hours, and general operation and maintenance (and the emergency call out arrangements if breakdowns occur) of the access gates will be required. Reason: To ensure that vehicles will not be waiting or causing congestion on the highway awaiting access to the site. 4. Electric Vehicle Charging Subject to a condition requiring the provision of 6 active and 6 passive electric vehicle charging points to serve the on-site parking spaces from the onset. Reason: to be in accordance with published Haringey Council Development Management DPD, Chapter 5 Transport & Parking and the published London Plan 2021 Policy T6.2 Office	

Stakeholder	Question/Comment	Response
	Parking. 5. Disabled parking bays The applicant will be required to submit and provide plans demonstrating how employees who require a wheelchair accessible car parking spaces will be provided with one from the onset; this must be submitted for approval before any development commences on site. REASON: to ensure the development is in accordance with the published London Plan 2021 T6.5 Non-residential disabled person parking. 6. Car Parking Management Plan The applicant will be required to provide a Car Parking Management Plan which must include details on the allocation and management of the on-site car parking spaces including all accessible car parking spaces. **S106 Obligations** 1. Construction Logistics Plan The applicant/developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development, and works cannot commence until this is 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: 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 and means of slot booking to avoid vehicles waiting on the highway and avoid the AM and PM peaks c) Estimates for the number and type of parking suspensions that will be required.	

Stakeholder	Question/Comment	Response
	d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. e) The undertaking of a highways condition survey before and after completion. f) The implementation and use of the Construction Logistics and Community Safety (CLOCS) standard. g) The applicant will be required to contact LBH Highways to agree pre commencement condition surveys. h) Site logistics layout plan, including parking suspensions, turning movements, and closure of footways. i) Swept path drawings. Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development in combination with other sites in the locality and to encourage modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect the amenity of neighbouring properties and to maintain traffic safety. <u>2. Commercial Travel Plan</u> A commercial travel plan must be secured for each unit by way of a 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. 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 £3,000 (three thousand pounds) per year per Travel Plan per unit, £15,000 (Fifteen thousand pounds) for monitoring of the travel	

Stakeholder	Question/Comment	Response
	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. 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. <u>3. Highway Improvements</u> The applicant will be required to enter into agreement with the Highway Authority under Section: 278 of the Highways Act, to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements, improved pedestrian and cycling infrastructure. The developer will be required to provide details of any temporary highways including temporary TMO's required to enable the occupation of each phase of the development, which will have to be costed and implemented independently of the main S.278 works. The works include but are not limited to: 1) The strengthening of the site's vehicle crossover to allow for an increase in heavy vehicle movements 2) Reconstruction of footways nearby to the site to mitigate deterioration caused by the development, 3) Resurfacing of the carriageway outside of the site to ensure that the road network can support the increase in trips by HGVs. Although the highway access is not proposed for any physical changes the applicant may well need to carryout works to remedy any construction related damage to the public highway relating to the demolition/construction and build out/fit out of the development. Reason: to improve accessibility to the site by foot and to ensure that the site is in accordance with the London Plan 2021 Policy T2 Healthy Streets and to implement highway works to facilitate future access to the development site.	

Stakeholder	Question/Comment	Response
Design	No objections	Conditions attached.
EXTERNAL:		
Met Police/ Secure by Design	**<u>Section 1 - Introduction</u>:** Thank you for allowing us to comment on the above planning proposal. With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. 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). I can confirm we have met with the project design team to review Safety, Security or Crime Prevention. We have concerns around some aspects of the design and layout of the development. At this point it can be difficult to design out fully any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences. We request that the developer continues to contact us to ensure that the development is designed to reduce crime at an early. Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity.	Noted. Conditions and informative attached.

Stakeholder	Question/Comment	Response
	The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to. Application Number: HGY/2024/1798 Location: International House, Tariff Road, Tottenham, London, N17 0DY Proposal: Demolition of the existing industrial buildings and the erection of a new four-storey building of Use Class B2 with ancillary offices and an external scaffolding storage yard (Use Class B8) with associated parking and landscaping. Please provide my details to the applicant so we can discuss and address our concerns. **Section 2 - Secured by Design Conditions and Informative:** Should planning consent be granted for this application, we would request the following conditions and informative: Conditions: A. Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained. Accreditation must be achieved according to current and relevant Secured by Design guidelines at the time of above grade works of each building or phase of said development. Confirmation of the certification shall be submitted to and approved in writing by the Local Planning Authority. The development shall only be carried out in accordance with the approved details. B. The commercial aspects of the development must achieve the relevant Secured by Design certification at the final fitting stage, prior to the commencement of business and details shall be submitted to and approved, in writing, by the Local Planning Authority. Reason: In the interest of creating safer, sustainable communities. Informative: The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk. **Section 3 - Conclusion:**	

Stakeholder	Question/Comment	Response
	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. Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office. **<u>Appendix 1: Concerns and Comments</u>** In summary we have overall site specific comments in relation to the following items. This list is not exhaustive and acts as initial observations based on the available plans from the architect and local authority planning portal. Site specific advice may change depending on further information provided or site limitations as the project develops: This list is not exhaustive and acts as concerns raised during consultation with the architects pre-application. Site specific advice may change depending on further information or site limitations as the project develops: To be utilised in further discussions with the appointed developer at a later stage. **Boundary Treatment** • Ideally side and rear boundary onto the public realm should be 2.4m (potentially 1.8m with 600mm trellis or 2.1m with a 300mm trellis). Any vertical transom (support) should be inward facing • Metal fabrication, should be robust, have an unfinished top rail (exposed tops), to deter loitering, sitting and climbing. We recommend 358 gauge weld mesh fence panels	

Stakeholder	Question/Comment	Response
	• If fencing is constructed of wood material, ensure panels are vertical with no support beams allowing climbing opportunities. Panels to be mechanically secured in place to prevent lift removal • All perimeter railings to have a maximum 50mm spacing centre to centre, be set flush to the front of any wall. If strengthened with mid rail must be designed to deter climbing and mid rail to be inward facing. Any perimeter boundary treatment (railings) should be between 1. 8m - ideally designed to provide visual permeability • Gates to be designed level to the front building line, any locking mechanism, hinges to be anti-climb and fitted with a dampened stop. Gating to be inclusive of a selfcloser and the same height as the perimeter treatment including any trellising • Where possible building lines should be flush to allow natural surveillance, any recesses should not exceed 600mm • If anti-climbing measures are introduced then signage should be used to comply with occupier's liability Act 1984 • Any boundary treatments should be UKAS certified as recommended by a DOCO • All low defensive wall/railings to be designed to deter sitting, loitering and climbing. **Access Control** • Key fob access control with a data logging system is recommended as this is more efficient to deactivate/replace lost/stolen keys. It can also assist with identifying any misuse • Data to be stored for one calendar month before being over written • Access control panels to have audio/visual capability. Primary camera on panel to capture all visitors • No Trade Button on control panel • Emergency Exit (push to release) primary egress routes that are required to have an emergency escape mechanism should be self-resetting, shrouded and in best practice be alarmed • Plant/Service room door set/s accessible by public realm are required to be one of the following UKAS certified products:	

Stakeholder	Question/Comment	Response
	○ LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or ○ STS202 Issue 3:2011 BR 2+ or ○ LPS2081 SR2 B+ or Equivalent certification • Consideration required regarding the security/risk management to Internet Of Things (IOT) Note: Service/plant door/s should be self-closing, self-locking single doors. **ACB (Access Control Box) / Fire Access** • An external fire over ride switch (FOS) should be protected with the use of an accredited security product such as a Gerda Box. Consideration to other suppliers of this type of fire switch protection method should be given, check SbD web site. In addition to the use of an ACB see below re Premises Information Box (PIB). https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/accesscontrol-box-(acb).aspx • Premises information box (PIB) typically used to store site specific documentation such as communal access routes, fire risers etc. PIB is generally located behind the primary security layer and is intended for LFB use only (Refer to current Homes guidance) • If the cause and effect of a fire over ride switch (FOS) activation poses a crime risk consideration to a Drop Key Protection Box should be made • The project fire consultant should be made aware of any Part B Security v's Safety conflicts https://www.gerdasecurity.co.uk/productsandservices/frs-lockingsystem/drop-key-protection-box-(dpb).aspx. **Doors** • Communal door set/s should be flush with the building line to prevent any recesses and should be certified to: ○ LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or ○ STS202 Issue 3:2011 BR 2+ or ○ LPS2081 SRB or Equivalent certification	

Stakeholder	Question/Comment	Response

	• We recommend that customer entrances have a secure lobby area to provide adequate security for staff and customers. The secondary lobby door set/s that are required to be dual certified to the following minimum standards:
	  ○ LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or
	  ○ STS202 Issue 3:2011 BR 2+ or
	  ○ LPS2081 SRB or Equivalent certification Fabricator 3rd party UKAS certification
	
	Note: Communal door/s should be self-closing, self-locking single doors
	
	Windows
	• All easily accessible windows (anything under 2m from another surface treatment) should be certificated to either:
	  ○ PAS24:2022 with BS EN356:2000 min.P4A glazing
	  ○ STS204 Issue 6:2016,
	  ○ STS202 Issue 7:2016 Burglary Rating 1
	  ○ LPS1175 Issue 7.2:2014 Security Rating 1 or
	  ○ LPS1175 Issue 8:2018 A1 Security Rating 1 or
	  ○ LPS 2081 Issue 1.1:2016 Security Rating A.
	
	Accessible windows includes any glass reached by climbing any number of floors via rain water pipes, balconies or via communal walkways (whether walkway accessed through secure door or not)
	• Any window within 2m of an accessible surface should have key operated locks
	• Where windows form an escape route, Part B (Fire) compliance should be adhered to
	• All ground floor, vulnerable and accessible windows must have a lockable window restrictor to prevent unauthorised access
	• Where curtain walling systems are proposed these should be certificated to either:
	  ○ LPS1175 SR2
	  ○ BS EN1627 RC3. (With minimum of BS EN356:2000 P4A Glazing)	

Stakeholder	Question/Comment	Response
	○ PAS24:2022 Note: Curtain wall systems are non-structural cladding systems for the external walls of buildings. Typically curtain wall systems comprise a lightweight aluminium frame onto which glazed or opaque infill panels can be fixed. These infill panels are often described as 'glazing' whether or not they are made of glass. **Vehicle gates** • Vehicle gates should be UKAS accredited to LPS 1175 B3 or LPS 2081 SRB or equivalent, with video and audio access control. **Refuse Storage** • Ideally should not allow access into the building from the refuse store • Street access doors to be single leaf and either ○ LPS1175 SR2 or ○ STS202 BR2/B3 • Doors to be single leaf, self-closing and self-locking with access control, ideally using magnetic locks to the previous documented standard. (2 x 500kg resistance (1200lbs/psi) positioned 1/3 from the top and 1/3 from bottom) • If louvre doors are used, these should be of robust construction (ideally steel) supported with a layer of steel mesh to the rear to prevent unauthorised access to the locking mechanism and prevent general misuse • A suitable level of lighting to be present within store, ideally low level at times of inactivity and full level illumination when in use. To compliment any CCTV. External lighting to be Dusk to Dawn covering door set • No external signage identifying the refuse store • CCTV should cover the refuse store and avoid positions that would restrict coverage. Note: Single leaf doors are available up to approx. 1500mm to and will facilitate 1100cc bins in LPS and STS. This will eliminate the weakness of the passive leaf manually operated locking system which leaves double doors more vulnerable.	

Stakeholder	Question/Comment	Response

	Cycle storage
	• Internal access doors to be ether:
	  ○ LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or
	  ○ STS202 Issue 3:2011 BR 2+ or
	  ○ LPS2081 SRB or Equivalent certification
	Must be single leaf, self-closing and self-locking with access control ideally using magnetic locks
	• Cycle storage lighting is required in all stores. In areas of no natural light or hours of darkness, a constant level of lighting is required for illumination. Connected lighting to provide low level lighting during inactivity and higher light levels when motion is detected
	• No external signage
	• CCTV must be installed in cycle stores. Should have unhindered views of the racking at all times and should be vandal resistant
	• There should be 3 locking points for cycles on the racks/stands provided. Cycle racking should be secured with anti-tamper fixings
	• Cycle store doors should allow light spill from with-in, either a small obscured viewing panel or robust louvre (as part of the door set)
	• Internal signage should ideally be placed inside the store to reinforce importance of securing cycles
	• If timber storage/sheds are to be used, then these must be of robust construction and designed to the SbD guidance (Sec 56). Requires at least 2 points of locking on the main door. If items of value are to be stored within the shed then a security anchor should be certificated to 'Sold Secure' Silver Standard LPS 1175 Issue 7.2:2014 Security Rating 1 or LPS 1175 Issue 8:2018 Security Rating A1.
	
	Alarm System
	The proposed site should benefit from an alarm system to meet BS EN 50131 (as minimum) which can include wireless systems.
	
	CCTV	

Stakeholder	Question/Comment	Response
	The development should be supported with HD CCTV in all areas that the public have access to and any valuable equipment such as entrances, lobby areas, post box, refuse store, cycle stores parking areas and stair cores. The footage must be of evidential values and stored for a minimum of 31 days. All footage to be time and date stamped and recorded in a format that is accessible to the local authority and police. CCTV systems should conform to BS EN 62676: 2014 - video surveillance systems. **Postal Strategy** Mailboxes should be covered by CCTV and meet TS009 standards or MPS robust mailbox specification below: • A minimum of 1.5mm thick galvanized steel construction. Its depth and width must allow mail to fall below the fishing plate unrestricted • Fitted with a 3-point locking mechanism supported with a minimum five pin cam lock • BS EN 1303:2005 (Inc corrigendum Aug 2009) compliant five/six pin camlock must have anti-drill, anti-bump and anti-pick lock attributes • Gap restricting aperture (anti-fishing max 260mmx40mm) The anti-fishing plate must be fabricated as part of the post box construction and extend into and across the full length of the letterbox opening to defend against the interference of mail, anti-leverage surrounding trim, welded claw on retrieval door to negate the ability to gain a leverage point and compromise the security of the mailbox • Unit to have a minimum of 13Ltrs storage. **Lighting** • Public realm lighting whether adopted highways/footpaths/private estate roads or car parks should meet BS 5489:2020 standard • Declaration of conformity should be overseen by an independent and competent lighting engineer. They should be qualified to at least ILP Level 3 or 4 in line with the latest SBD guidance. https://theilp.org.uk/ • Internal lighting Communal elements of any scheme, ideally should be a controlled by a photo electric sensor. This to ensure suitable levels of lighting at all times. Where	

Stakeholder	Question/Comment	Response

	no natural light is available two phased lighting can be used (low level for nonactivity, higher level once movement is detected)
	• Lux is the measurement of light reaching a surface (1 lux is the light emitted from one candle that is 1m away from a surface 1sqm). Examples of suitable Lux levels are listed below:
	  ○ Office interior (security) 05 Lux
	  ○ Private car parks 10 Lux
	  ○ Exterior Rural location 10 Lux
	  ○ Exterior Urban location 20 Lux
	  ○ Walkways 30 Lux
	  ○ Loading bays 50 Lux
	Further guidance is available in the “Lighting against crime” manual
	• The even distribution of light across the area being illuminated. A good lighting system is one designed to distribute an appropriate amount of light evenly with uniformity and should include the following:
	  ○ Values of between 0.25 and 0.40
	  ○ Using lamps with a rating of at least 60 (minimum) on the Colour Rendering Index.
	  ○ Good lighting will use energy efficient lamps in suitable luminaries
	• Dusk-Till-Dawn lighting where possible should consist of white light which is evenly distributed. In communal areas all entrances should have dusk till dawn lighting supported via a photo electric cell. Allowing lighting to controlled automatically
	• Bollard lighting shall be avoided due to its history of vandalism and ease of covering. Up lighters and decorative lighting can be used but only in unison with columns providing the required standards of light for good clear facial recognition illumination
	
	Climbing Aids
	• It is recommended that any climbing aids such as balconies, canopies, protruding brickwork/cladding etc., should not be positioned near any windows/doors and fixed	

Stakeholder	Question/Comment	Response
	flush with the building/boundary. This will mitigate against burglaries and domestic violence perpetrators. • Canopies above entrances should be avoided to deter rough sleepers or the concealment of any perpetrators from misusing this area. If canopies are used then the depth must be below 600mm and they must be non-load bearing. If any canopy is robust enough to withstand a person standing on top, all nearby windows will be classed as vulnerable and therefore will be required to be PAS24 P2A. • Any drain/rain pipes should ideally be internally installed. External drain/rain pipes should be of square design and sit flush against the building to prevent them being used as a climbing aid. They should be located away from any windows or balconies. **Roof Access** • AOV's should not be restricted from working, however can be reinforced potentially with fixed grille or railing (LPS 1175 SR1) to prevent unauthorised access • Easily accessible roof lights should be a one of the following standards: o PAS24:2022 or o STS 204 (issue 6: 2016) or o LPS1175 (issue 7: 2014) SR1 or o LPS1175 (issue 8: 2018) SR1 / A1 or o STS202 (issue 7: 2016) BR1 or o LPS2081 (issue 1.1: 2016) SR A • If roof door access is required for “maintenance only” the door should be PAS24:2022 as a minimum. This door should be secured ideally with a key. However, access control can be used in conjunction with a recommended locking mechanism and must be restricted to maintenance staff only. **CCTV / Alarm** • Any alarm installed should meet BS EN 50131 (as minimum) • CCTV should complement other security measures, not replace them. As a minimum police recommend coverage of the following areas:	

Stakeholder	Question/Comment	Response
	○ Entrance & exit points including secondary coverage of call points ○ Foyer / Lobby areas ○ Post boxes and Postal rooms ○ Cycle stores ○ Refuse stores ○ Top of stair cores • Image quality should be able to provide facial recognition and colour HD quality during daylight and night time • CCTV housing to be anti-vandal and potentially shrouded. Signage highlighting use of CCTV should displayed throughout the development • Footage should be preserved for a minimum of 31 days • Any CCTV system that captures footage of public areas must comply with the regulations outlined by the Information Commissioner's Office • To be stored securely on a remote cloud system, or on a locked and secured hard drive i.e. within a secure area behind a PAS24:2022 door or SR1 lockable steel cabinet • Police access to footage must be within a minimum of 24 hours and a maximum of 48 hours for evidential purposes. **Note - There are further concerns that need to be discussed with the applicant**. **Lithium Ion Battery Devices and Vehicles Disclaimer** This development / application has cycle storage facilities and / or areas that may require the charging and storage of Lithium-ion powered vehicles or devices, within the building or the wider site footprint. The developer or developer's agent must be aware that it is their responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of these storage facilities and areas, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion products have been considered and specified. The LFB guidance on this matter can also be passed to partners who ask for additional guidance.	

Stakeholder	Question/Comment	Response
	https://www.london-fire.gov.uk/media/8064/gn_103-charging-and-storage-for-electricpowered-personal-vehicles.pdf	
EXTERNAL: Thames Water	Waste Comments 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. https://www.thameswater.co.uk/developers/larger-scaledevelopments/planning-your-development/working-near-our-pipes The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009	Noted and informative added.

Stakeholder	Question/Comment	Response
	3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB 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. 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. Water Comments The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to	

Stakeholder	Question/Comment	Response
	the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planningyour-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 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. 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. The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at https://www.gov.uk/government/publications/groundwaterprotection-position-statements) and may wish to discuss the implication for their development with a suitably qualified environmental consultant.	

Stakeholder	Question/Comment	Response
APPENDIX 3: **REPRESENTATIONS BY** Adjoining occupiers/ neighbours **NEIGHBOURING PROPERTIES**	Cllr Bevan: As a Cllr of long standing, I am responding to this application. I have visited the above address, and my comments are below and are based on my observations and local knowledge during my 20 years as a Cllr for this ward and as the Design Champion for Haringey In addition, I now refer to the MAYOR of London's Planning Guidance, I would require that this proposal does comply with the above standards and indeed building regulations. I note the design qualities of an adjacent logistics development at the end of Willoughby Lane, URBAN LOGISTICS SCHEME, please ensure this developer visits and observes the high design standards there. Tariff Road to put it bluntly is a complete mess and as this is the 1st such development in this road we need to set the high standards for the other developments that will undoubtedly follow. In addition, the street scene needs to much improved / upgrade to which the 106 monies should provide for, and for the whole length of this road. I would like to see the proposed design before a decision is made.	Noted, subject to conditions.

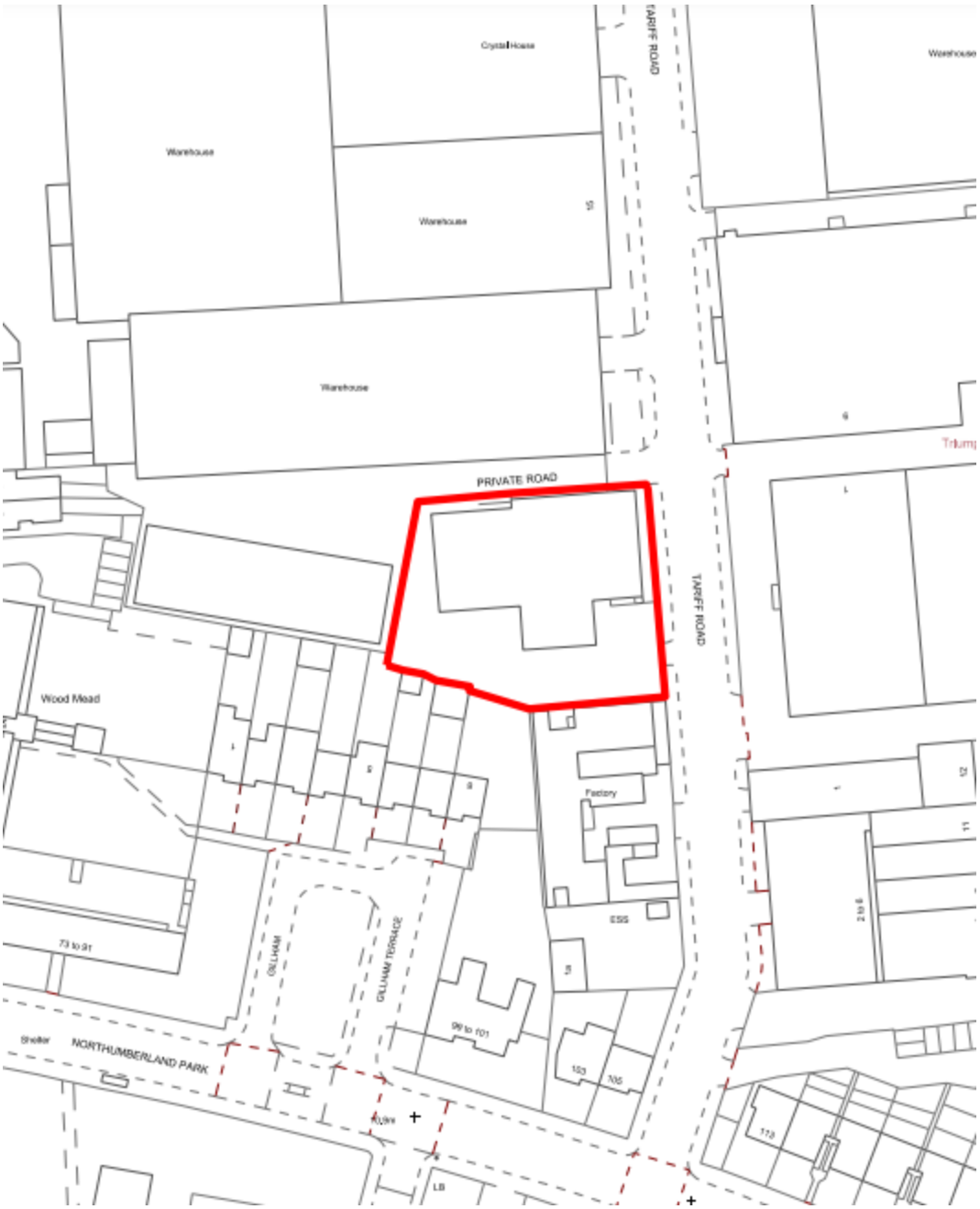
Appendix 4 Plans and Images

Site photos

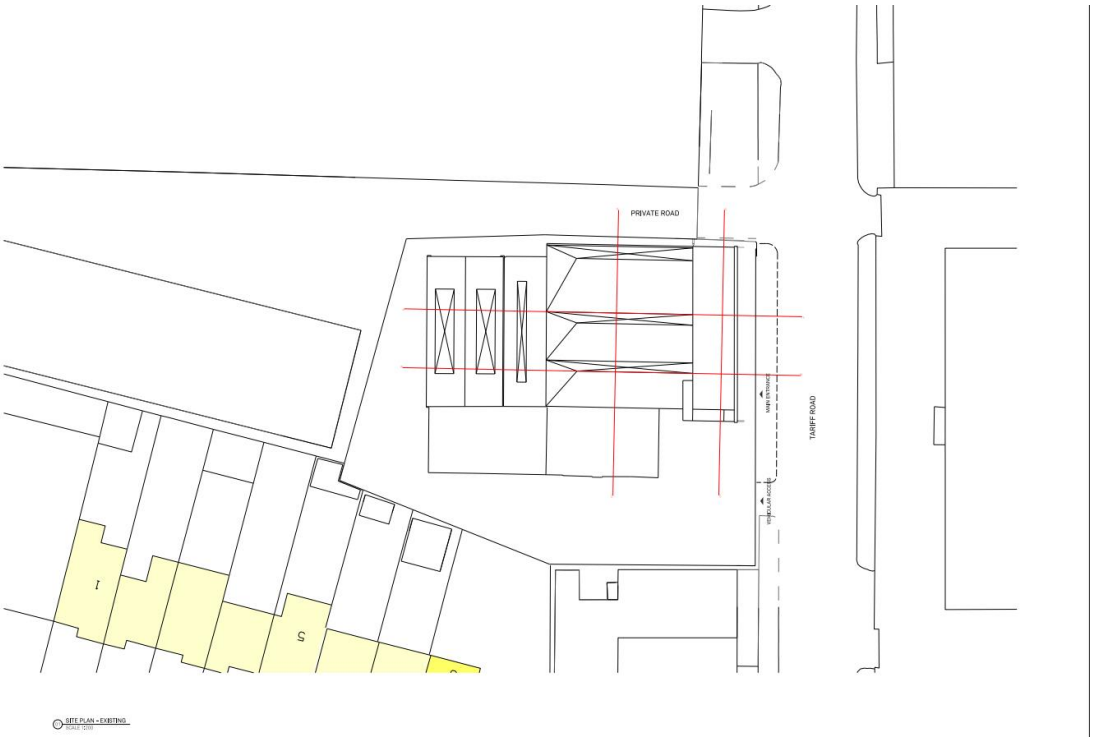
Front elevation, viewed from north-east on Tariff Road

Front elevation, viewed from east on Tariff Road

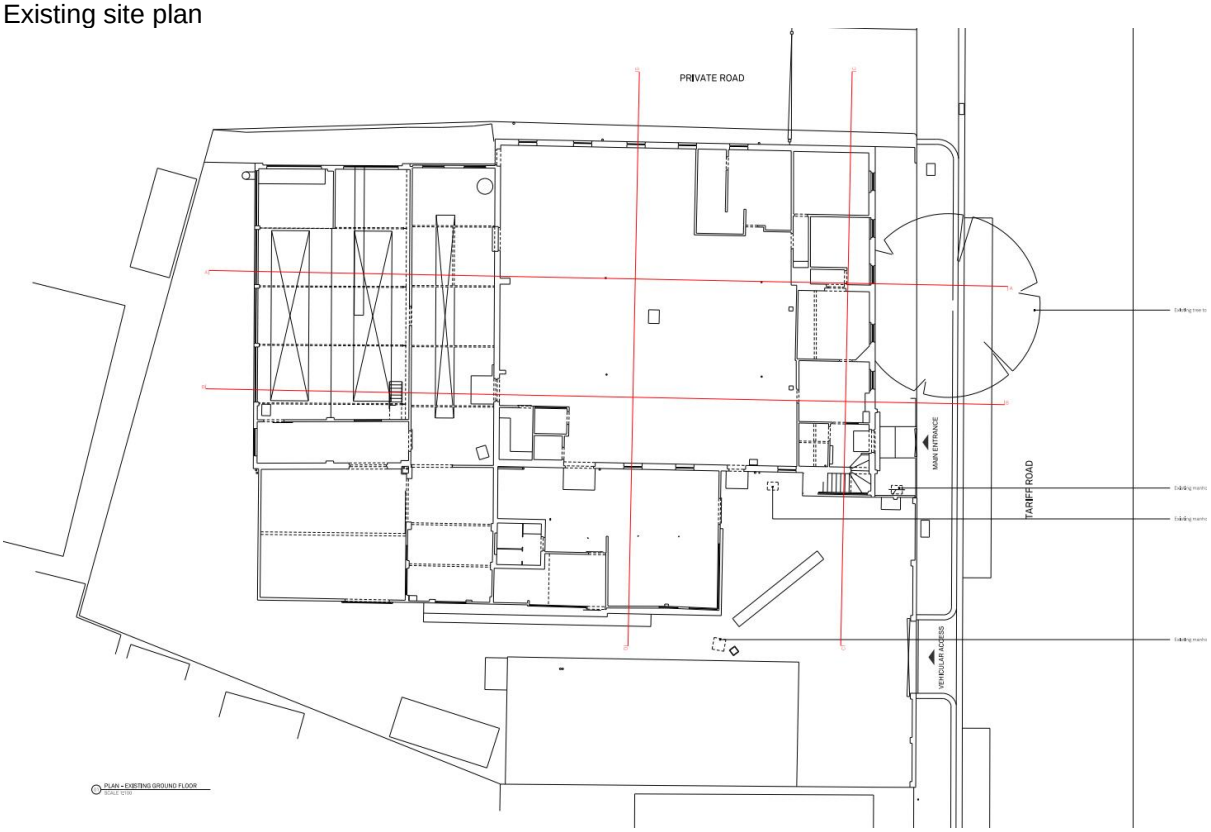
Plans



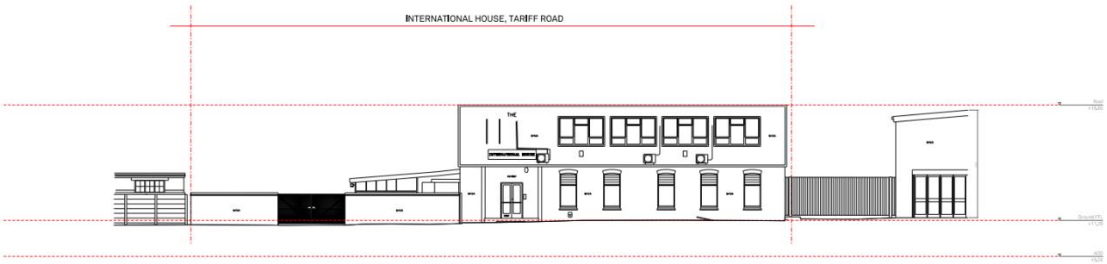
Site location plan



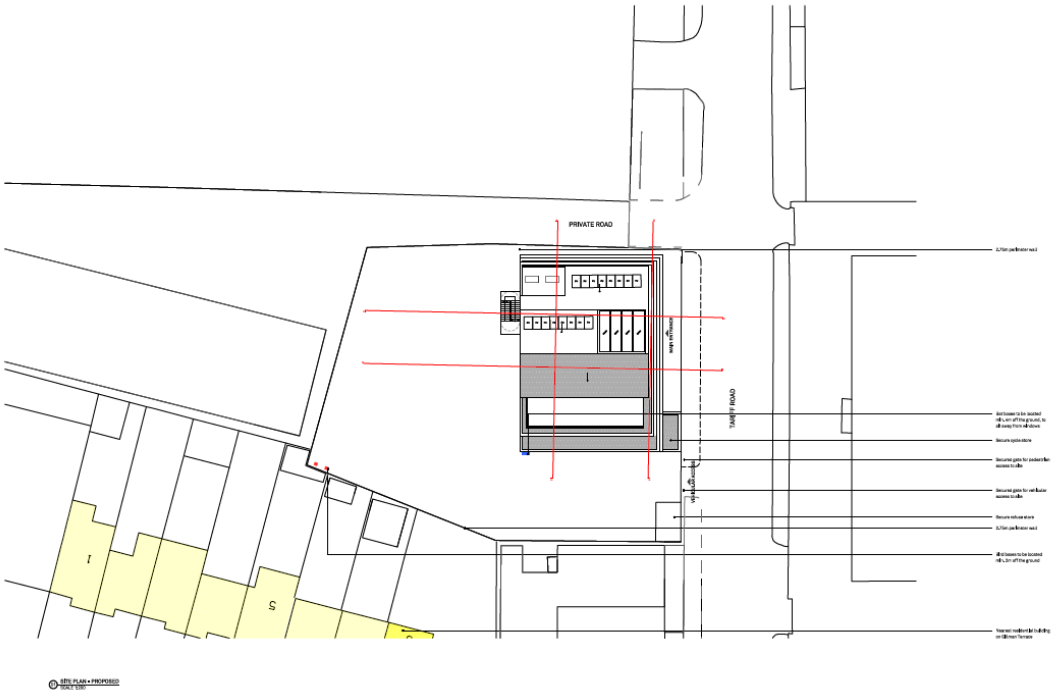
Existing site plan



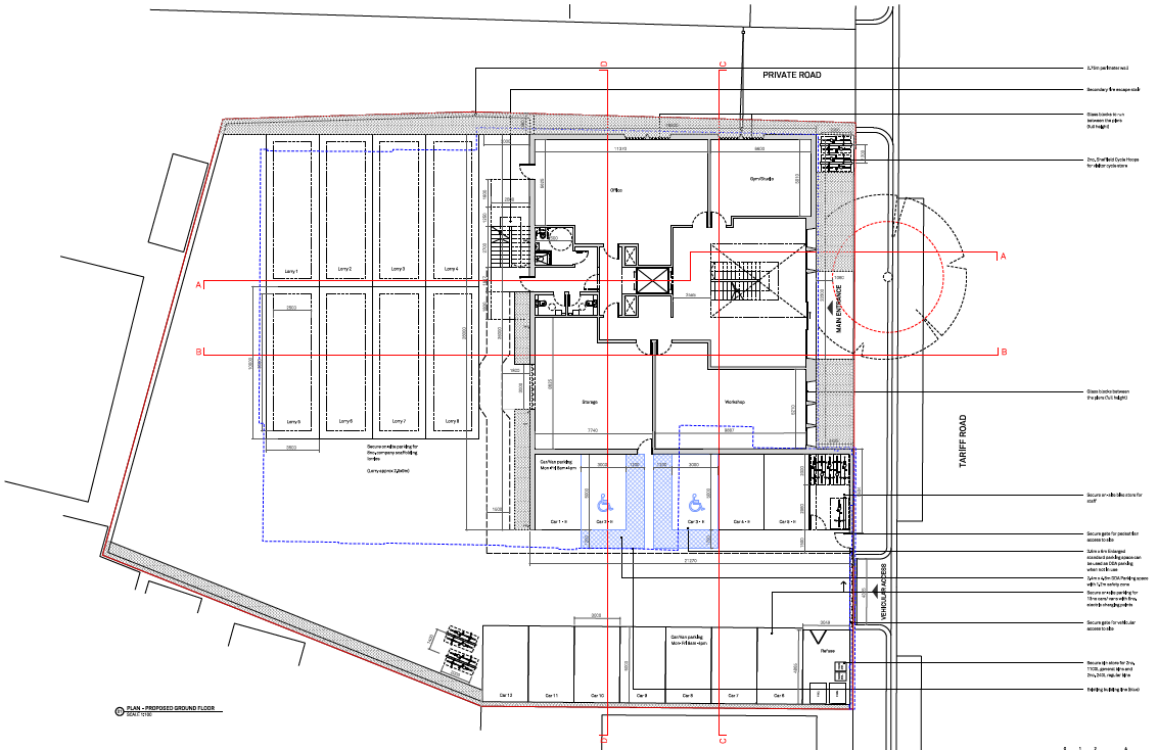
Existing ground floor plan



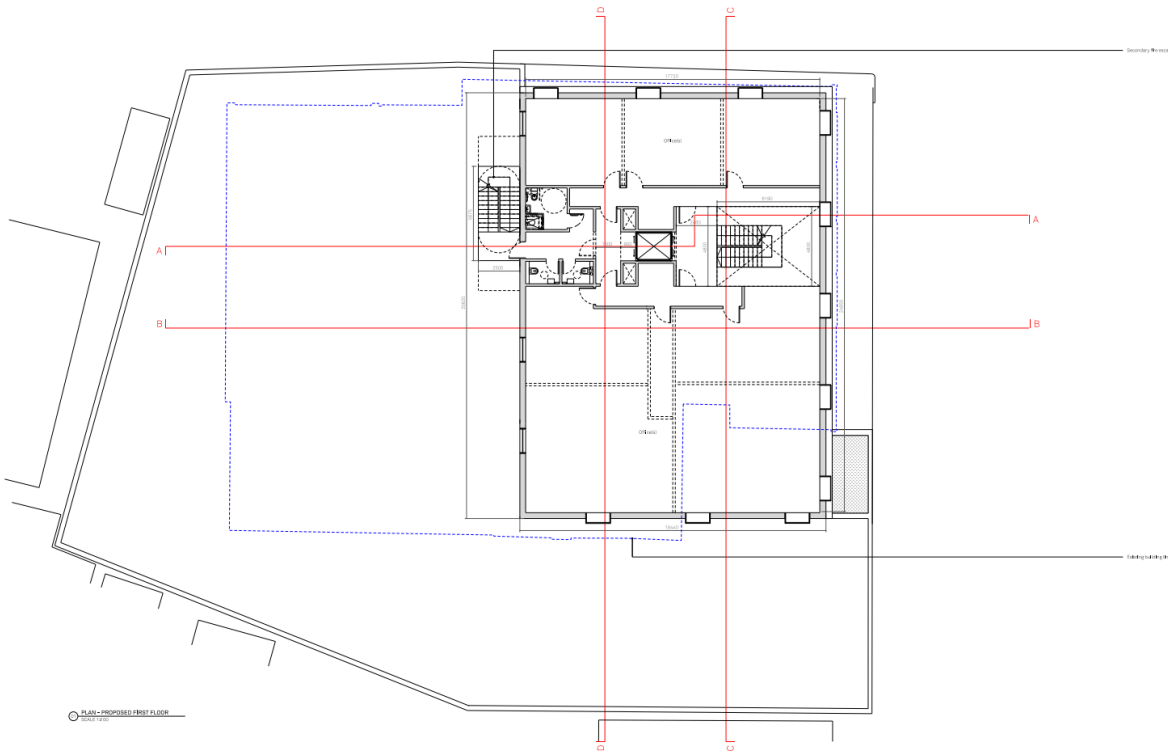
Existing east/ front elevation



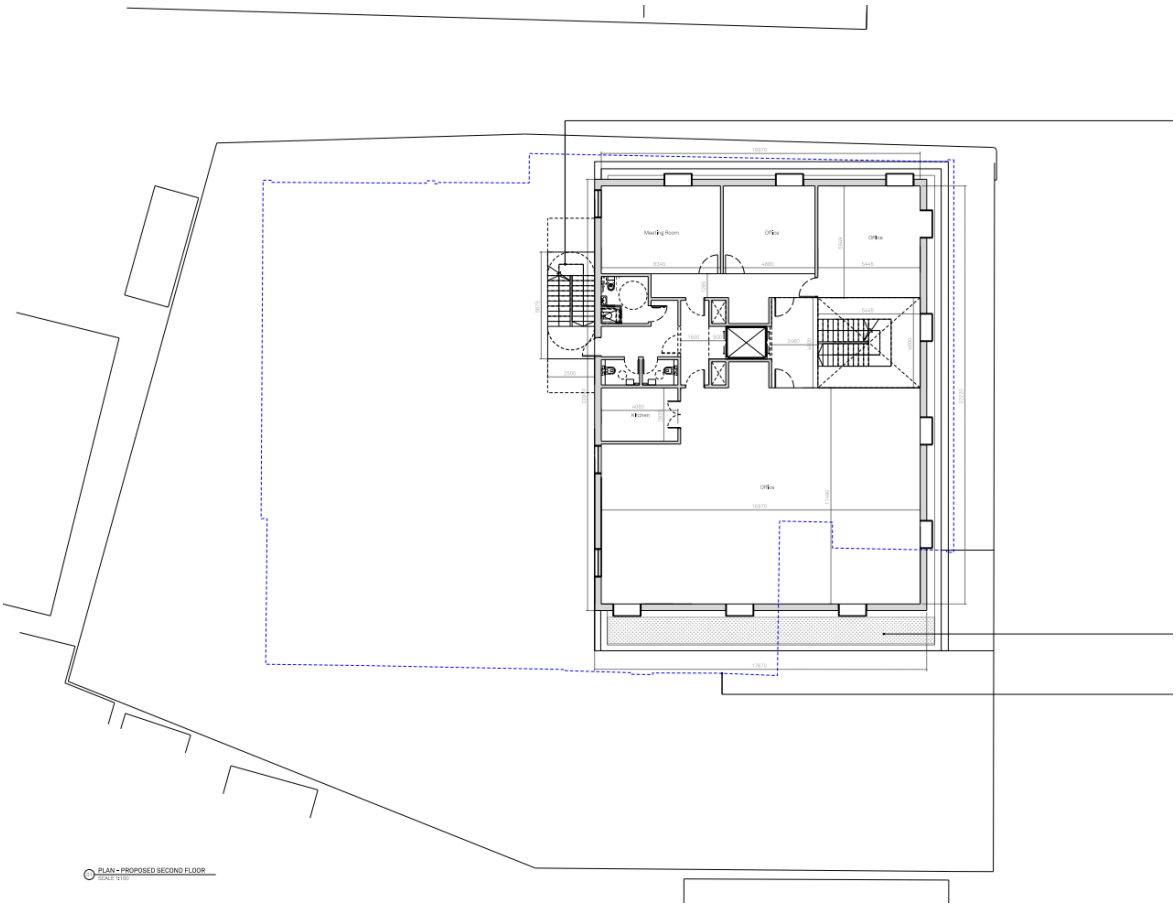
Proposed site plan



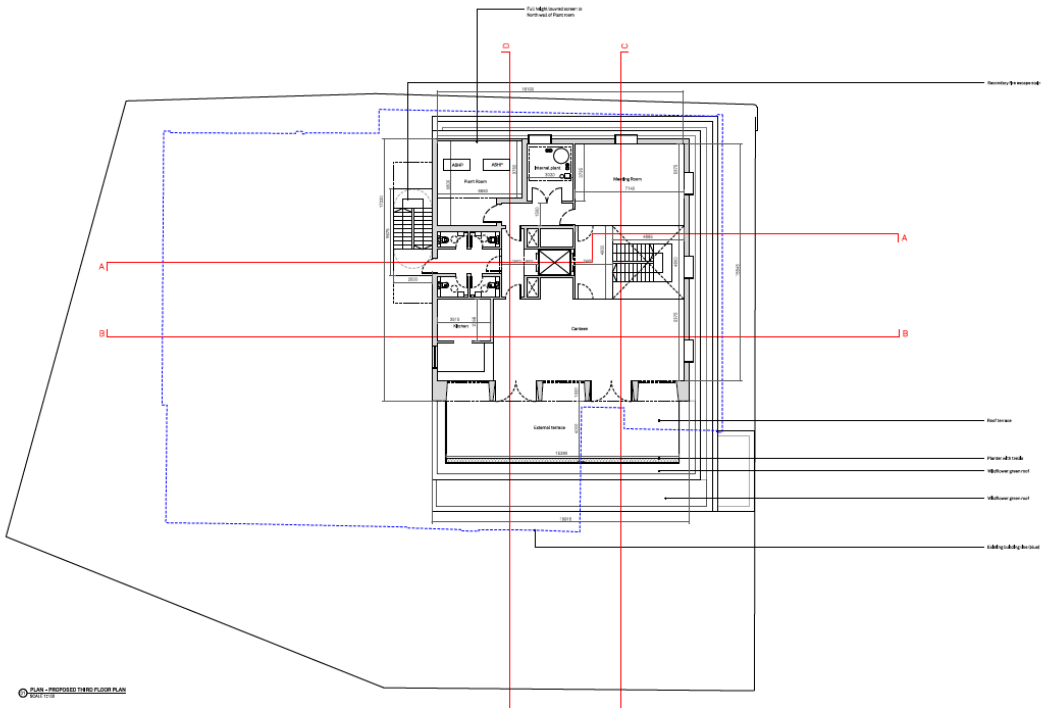
Proposed ground floor plan



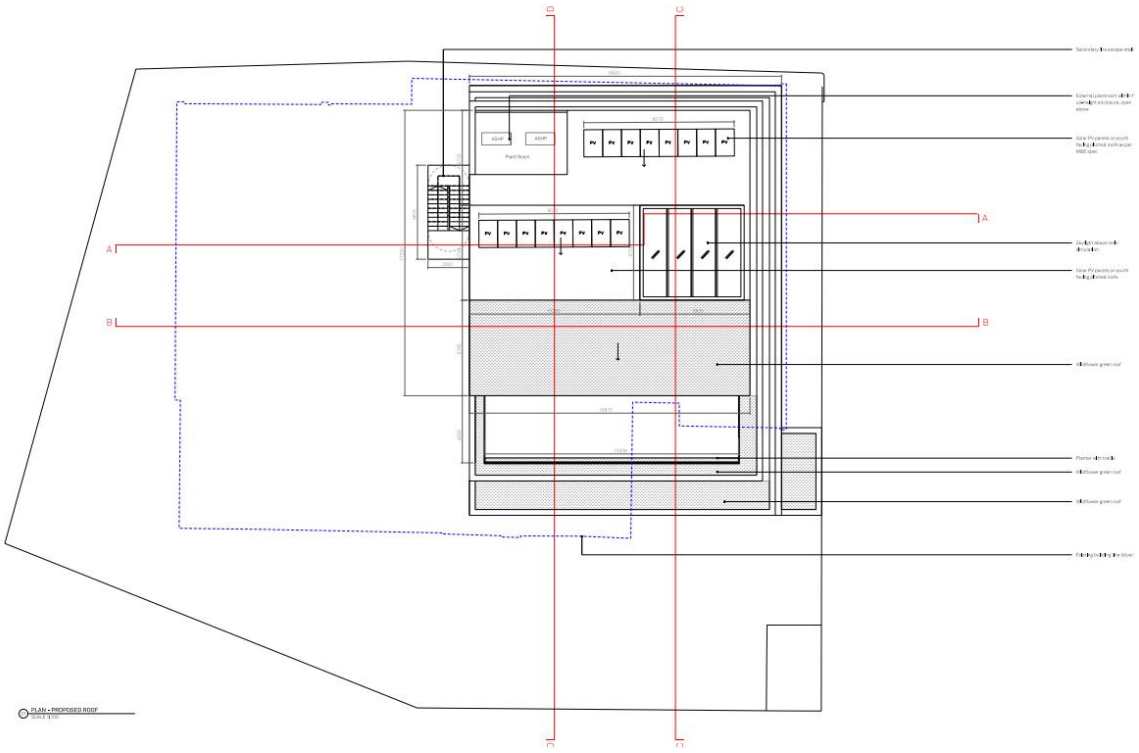
Proposed first floor plan



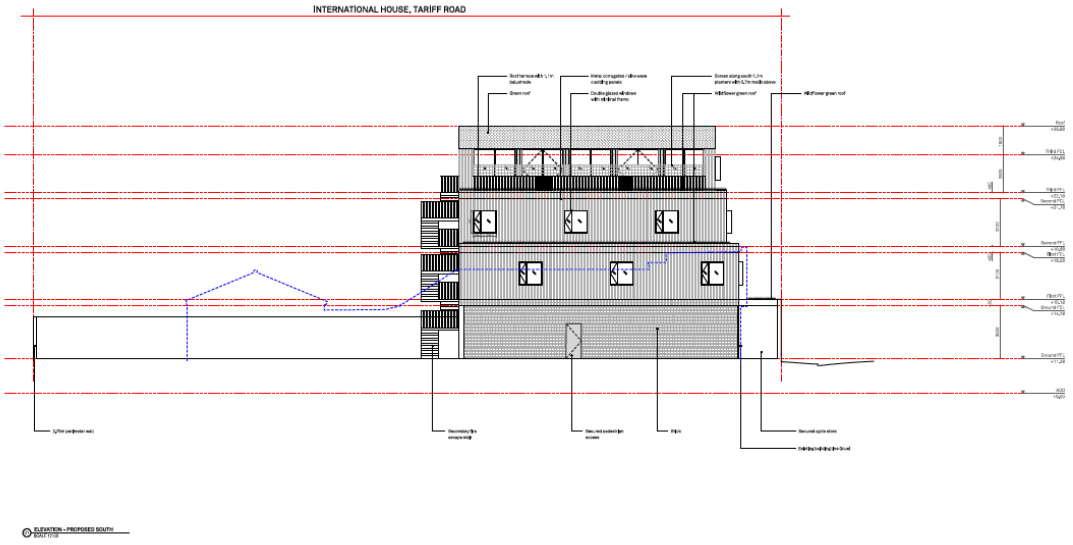
Proposed second floor plan



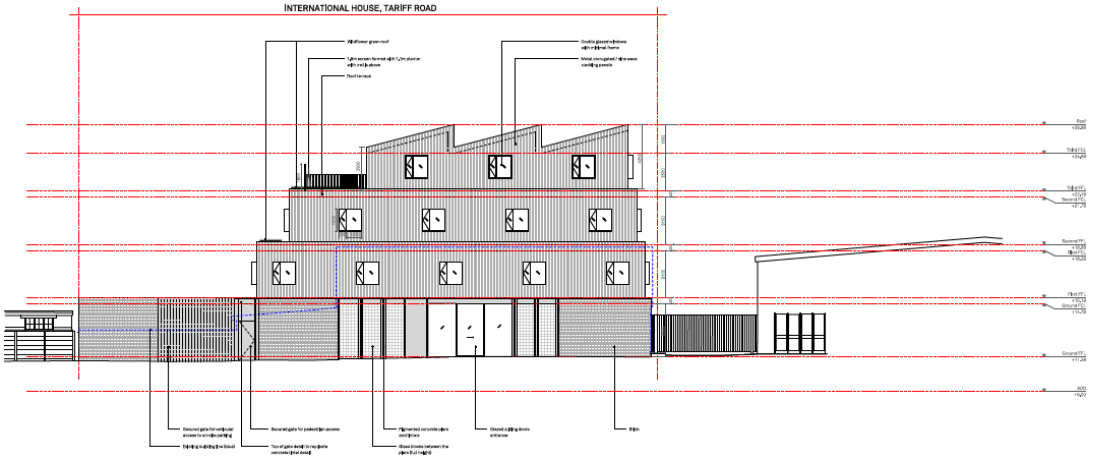
Proposed third floor plan



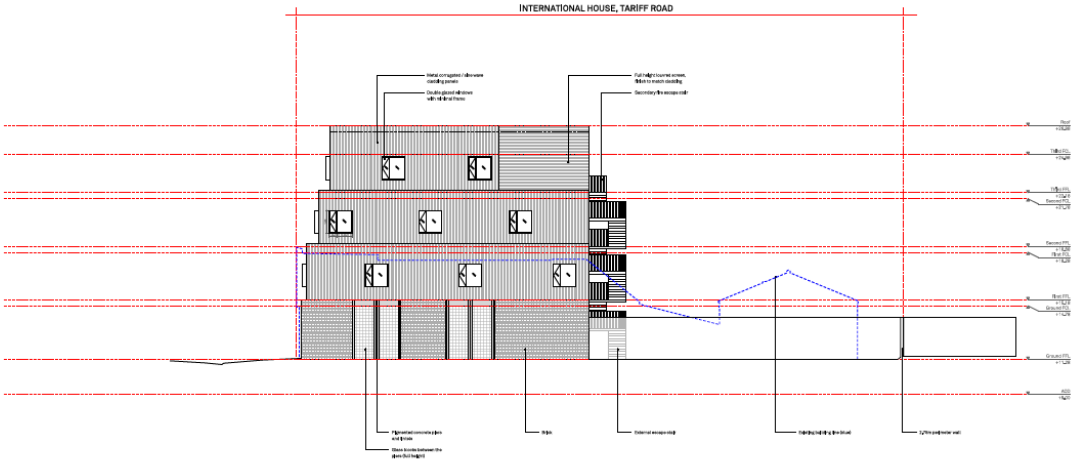
Proposed roof plan



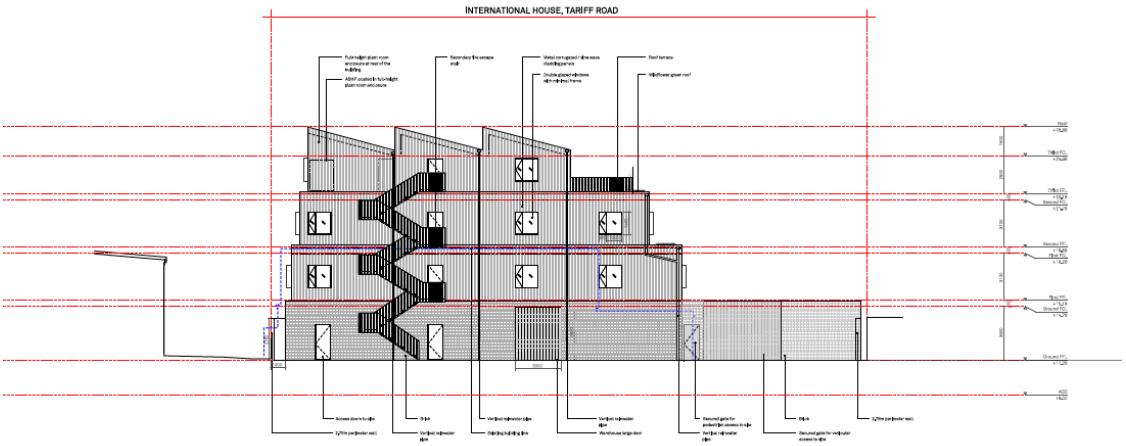
Proposed south elevation



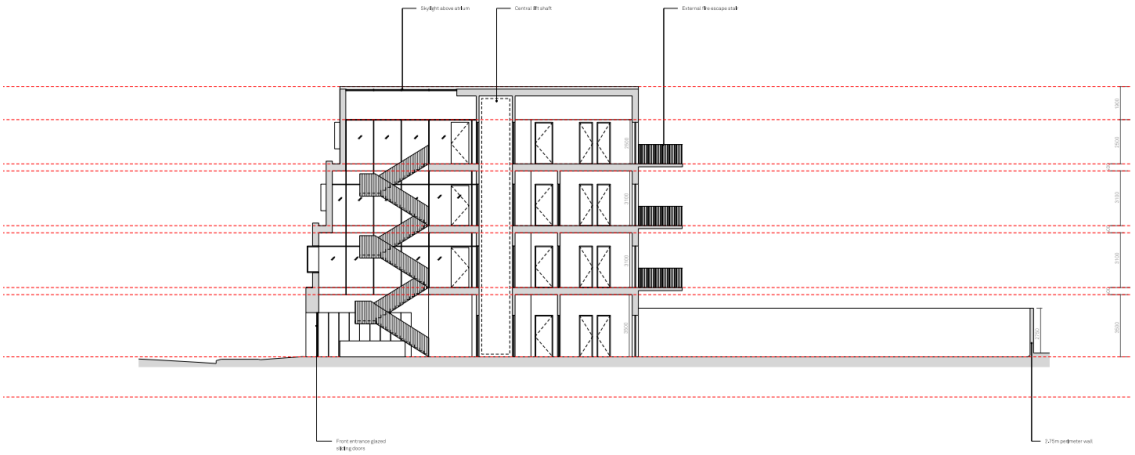
Proposed east/front elevation



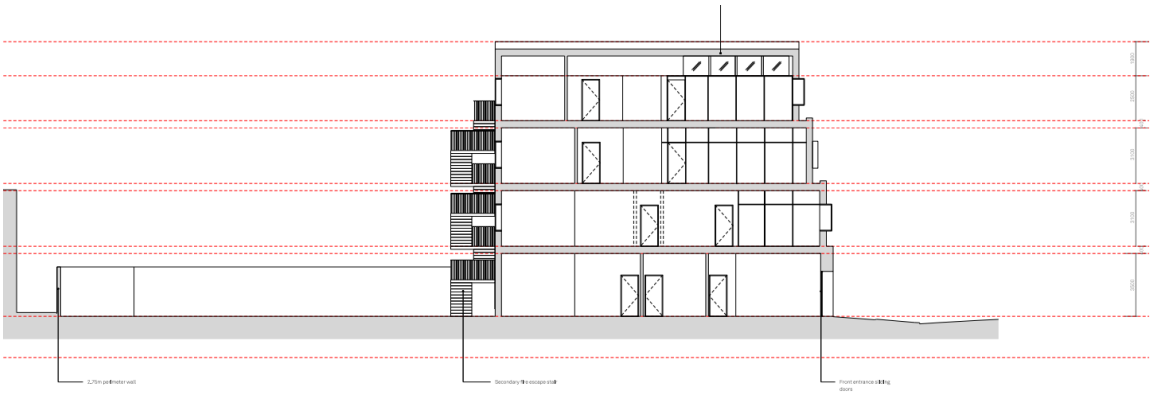
Proposed north elevation



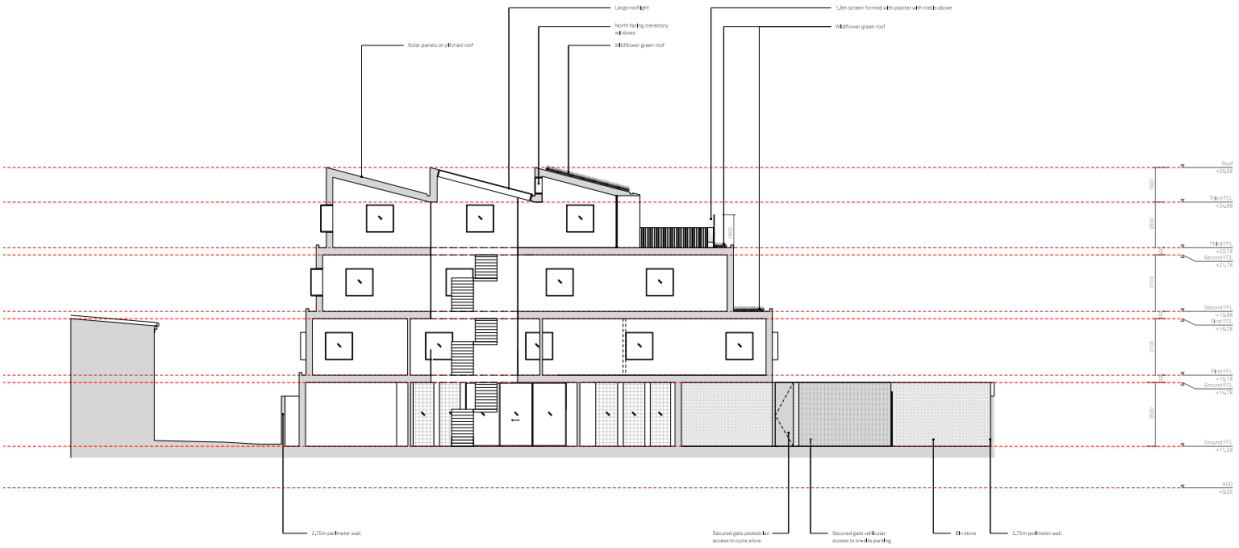
Proposed west elevation



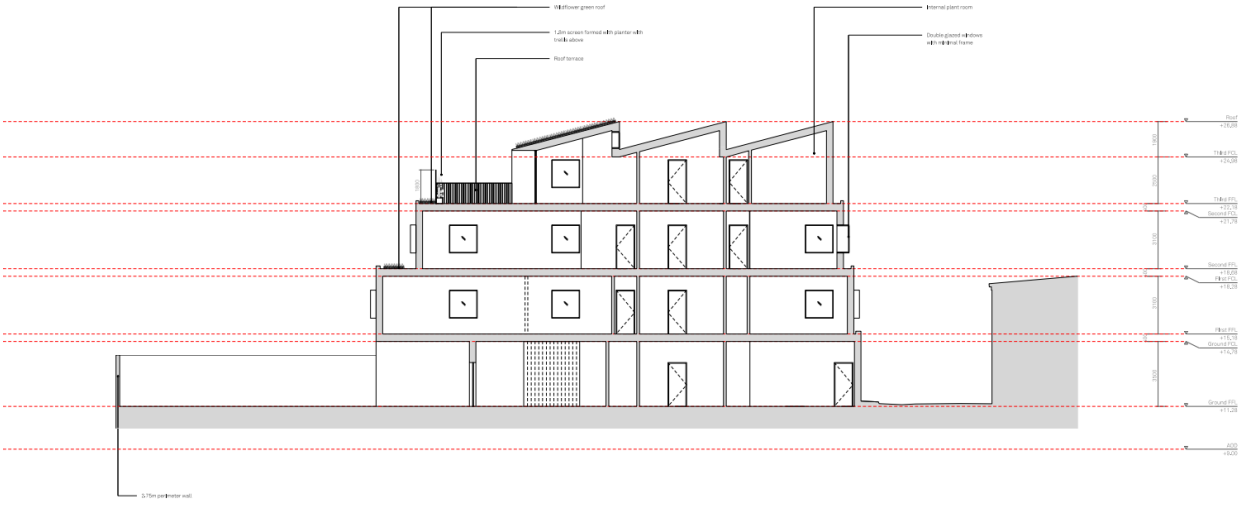
Proposed section AA



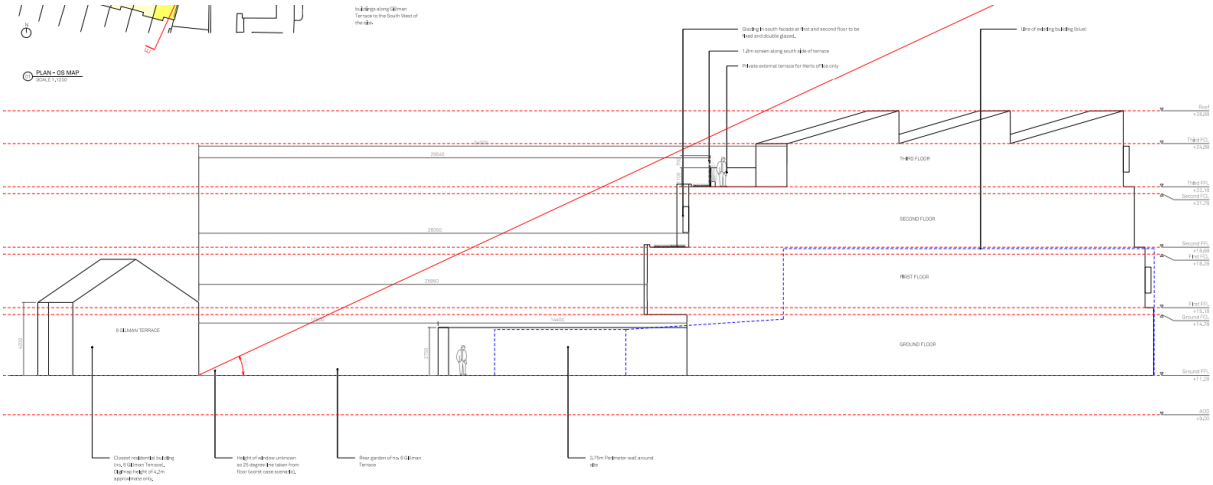
Proposed section BB



Proposed Section CC



Proposed Section DD



Proposed Section EE