Appendix 3: Internal and External consultation representations

APPENDIX 3	INTERNAL AND EXTERNAL CONSULTEE COMMENTS	
Stakeholder	Comment	Response
INTERNAL CONSULTEES		
Arboricultural Officer	From an arboricultural point of view, I hold no objections to the proposal. The location is within the Trinity Gardens Conservation Area.	Conditions for tree protection and planting recommended
	An arboricultural survey has been submitted by Sharon Hosegood Associates dated May 2025. The report includes arboricultural method statement, standard method statements, and tree protection plan (TPP).	
	I concur with much of the document including the tree quality classification categories.	
	There is the removal of eight onsite trees and one off site tree (five category B and four category C). A mixture of 17 new standard trees are to be planted. A net gain of 8 trees.	
	A biodiversity net gain and urban green factor has been carried out and meets the requirements.	
	A detailed landscape plan has also been included.	
	We will require a landscape specification, and an aftercare programme for the landscaping to ensure establishment and independence within the landscape.	
	Providing all of the arboricultural report is adhered to and conditioned including the TPP Drawing Number SHA 1876 TPP, I have no major concerns or objections.	
Carbon	Carbon Management Response 27/10/2025	Conditions
Management	In preparing this consultation response, we have reviewed: • Energy Statement prepared by BWB consulting (dated June 2025) • Part L 2021 GLA carbon emission reporting spreadsheet	and Obligations attached
	 Overheating Assessment prepared by BWB consulting (dated June 2025) Sustainability Statement prepared by BWB consulting (dated June 2025) 	
	Relevant supporting documents.	
	Summary The development achieves a 77% reduction in regulated carbon dioxide emissions on site, which is supported in principle. This is achieved through a combination of high fabric efficiencies, communal and individual air source heat pumps (ASHPs), and a 41.65 kWp solar photovoltaic (PV) array. The proposal also includes living roofs, which are supported in principle subject to detailed design. In order to	

comply with the zero-carbon policy, a carbon offset contribution of £22,230 is therefore required to offset the remaining emissions.

While the energy strategy is broadly supported, clarifications are required regarding the overheating strategy. The current approach relies on mechanical ventilation with air tempering, without sufficiently demonstrating how passive measures have been maximised in line with the London Plan's cooling hierarchy. The glazing ratio exceeds 50%, which is significantly above the LETI recommended range of 10–25%, suggesting that the orientation and layout of the proposed development have not been carefully optimised to minimise overheating risks.

Carbon Management cannot currently support this application. The development does not currently meet:

London Plan Policy SI4 and Local Plan DM21: The
overheating strategy does not follow the cooling hierarchy and
fails to limit unwanted solar gains with passive measures,
which is the first step of the cooling hierarchy. Dynamic
thermal modelling must be revised using the Central London
weather file and passive measures must be prioritised.

Further information is required to address these objections, particularly in relation to the Overheating Strategy. These issues should be addressed prior to determination.

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 77% 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 26.7 tonnes of CO_2 from a baseline of 34.5 t CO_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: 17.2 tCO₂.

Site wide (SAP10.2 emission factors)				
	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)	
Part L 2021 baseline	34.5			
Be Lean	24.5	10.0	29%	
Be Clean	24.5	0.0	0%	
Be Green	7.8	16.7	48%	
Cumulative savings		26.7	77%	
Carbon shortfall to offset (tCO ₂)	7.8			

Carbon offset contribution	£95 x 30 years x 7.8tCO ₂ /year = £22,230
10%	£2,223
management fee	

Residential	Residential			Non-residential		
	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percei saving (%)
Baseline	32.1			2.4		
Be Lean	22.4	9.7	30%	2.1	0.4	15%
Be Clean	22.4	0.0	0%	2.1	0.0	0%
Be Green	6.8	15.6	49%	1.0	1.0	42%
Cumulative savings		25.3	79%		1.4	57%
Carbon shortfall to offset (tCO ₂)	6.8			1.0		

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.

	Proposed Development	GLA Benchmark
Building type	Residential	Residential
EUI	43.68 kWh/m²/year	Does not meet GLA benchmark of 35 kWh/m²/year
SHD	12.73 kWh/m²/year	Meets GLA benchmark of 15 kWh/m²/year
Methodology used	Part L1 - SAP 10.2 & dwellings / Part L2 - approved DSM & Landlord Circulation	

Actions:

- The calculated Energy Use Intensity (excluding renewable energy) is higher than the GLA benchmark. This means the resulting operating energy costs will be high, and it is recommended to explore measures to minimise the EUI aiming for 35 kWh/m2/year.
- The report mentions high energy demand from heating, domestic hot water, and miscellaneous including electric heat network distribution and cooling. Please provide further information on this and proportion for each.

Energy – Lean

The applicant has proposed a saving of 10 tCO_2 in carbon emissions (29 %) through improved energy efficiency standards in key elements of the build. This goes beyond the minimum 10% and 15% reduction respectively set in London Plan Policy SI2, so this is supported.

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

Floor u-value	0.11 W/m ² K
External wall u-value	0.15 W/m ² K
Roof u-value	0.11 W/m ² K

Door u-value	1.20 W/m ² K
Window u-value	1.10 W/m ² K
G-value	0.40
Air permeability rate	3 m ³ /hm ² @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery (MVHR 95% efficiency; 0.53 W/l/s Specific Fan Power)
Waste Water Heat recovery?	Yes, 54.90% at a flow rate of 8.00 litres/minute.
Thermal bridging	Accredited Construction Details
Low energy lighting	100%
Improvement from the target fabric energy efficiency (TFEE)	-0.74% to 11.43 % improvement.

Actions:

- The improvement from the target fabric energy efficiency (TFEE) ranges from an increase of 0.74% to a decrease of 11.43%. Please provide reasons for such discrepancy and actions measures to improve the FEE.

Overheating is dealt with in more detail below.

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. The site is not within reasonable distance of a proposed Decentralised Energy Network (DEN).

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.

Proposed Renewable technologies	Туре	Specification
Main space heating system and DHW system	Communal Air source heat pump to Block A, and B.	Heating min. SCOP: 3.57
	Individual ASHP to Block C	aroTHERM Plus 7 kW A+++ Air to Water Heat Pump (ASHP) Heating min. SCOP: 3.39 DLF=1.50

Solar PV	Peak output	41.65 kWp covering
residential		189.33 m ²

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.

All major plants is proposed to be fitted with meters to allow remote monitoring of energy used by the heating systems and distribution boards. A commitment is proposed to be put in place to monitor the readings so that they can be compared with the predicted energy performance, and this information will be reported, as details in the GLA 'Be Seen' guidance.

- 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-planguidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform)

Carbon Offset Contribution

A carbon shortfall of 7.8 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years.

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 TM59 with TM49 weather files. The report has modelled 39 habitable rooms, 21 Living/Kitchen/Dining under the London Heathrow Weather files.

The Air & Noise assessments determined that all windows in the Proposed Development will need to always remain closed to adhere to internal noise criteria. Therefore, for TM59 compliance mechanical ventilation criteria is applicable. On this instance, natural ventilation criteria should also be reported to demonstrate that the passive measures have been maximised in line with the Cooling Hierarchy, and the façade design has been optimised regardless of the constraints posed by the site's location.

Results are listed in the table below.

Domestic:	Predominantly naturally ventilated		Predominantly mechanically ventilated
CIBSE TM59	Criterion A (<3% hours)	Criterion B for bedrooms (less than 33 hours)	Number of habitable rooms pass (<3% hours)
DSY1 2020s	Please model without MVHR air tempering	Please model without MVHR air tempering	60/60
DSY2 2020s			60/60
DSY3 2020s			55/60 (92%)
DSY1 2050s			53/60 (88%)
DSY1 2080s			50/60 (83%)

All spaces pass the overheating requirements for 2020s DSY1, using MVHR with air tempering. The measures proposed does not follow the London Plan's Cooling Hierarchy and relies on mechanical ventilation with air tempering to achieve compliance. Several initial steps of the cooling hierarchy have been skipped which indicates the cooling demand has not been reduced and is very high, which will increase the energy costs of cooling.

The Early-Stage overheating risk toolkit indicates very high overheating risks in the proposed development. The proposed glazing ratio is more than 50% (more than double than the LETI recommended: 10-25%). This indicates that the orientation and layout of the proposed development have not been carefully optimised to minimise the risks of overheating.

On the other hand, the report claims to have designed energy efficient façade with appropriate proportion of glazing. However, this claim can be challenged as the energy demand is very high indicated by the high Energy Use Intensity of 43.68 kWh/m²/year compared to the GLA benchmark of 35 kWh/m²/year.

Overall, the submitted overheating strategy is not acceptable as it fails to limit unwanted solar gains with passive measures which is the first step of the cooling hierarchy. This goes against Policy SI4.

Actions:

- Redo the overheating modelling with the Central London weather file, which will more accurately represent the urban heat island effect.
- Include images indicating which sample dwellings were modelled and floorplans showing the modelled internal layout of dwellings.
- Please confirm else undertake further modelling:
 - All single-aspect rooms facing west, east, and south;
 - At least 50% of rooms on the top floor;
 - 75% of all modelled rooms facing South or South/West:
 - Communal corridors, where pipework runs through;
- Cooling Hierarchy:
 - Demonstrate how the Cooling Hierarchy has been followed successfully and model the natural ventilation criteria without MVHR with air tempering to

- demonstrate façade design has been optimised regardless of the constraints posed by the site.
- Please amend the glazing ratio and explore more option to limited the direct solar gains with a shading strategy. Provide details of the shading strategy including: technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, external shutters), elevations and sections showing where these measures are proposed.
- The applicant must demonstrate that the risk of overheating has been reduced as far as practical and that all passive measures have been explored, including reduced glazing and increased external shading. The applicant should also outline a strategy for residents to cope in extreme weather events, e.g. use of fans.
- Specify the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m² and MY/year?
- Set out a retrofit plan for future and more extreme weather files, demonstrating how these measures can be installed, how they would reduce the overheating risk, what their lifecycle replacement will be, and who will be responsible for overheating risk.
- This development should have a heatwave plan / building user guide to mitigate overheating risk for occupants.

Sustainability

Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques.

The submitted Sustainability Statement sets out a comprehensive approach to sustainable development, addressing a wide range of environmental and climate-related considerations. The proposal incorporates measures to improve sustainability across key areas including: transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO emissions, and landscape design. Specific commitments include water efficiency measures, sustainable material sourcing, and circular design principles to reduce whole-life carbon. The development also commits to responsible construction practices through registration with the Considerate Constructors Scheme and implementation of an Environmental Management System.

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 in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. 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.

Planning Obligations Heads of Terms

- Be Seen commitment to uploading energy data
- Energy Plan
- Sustainability Review
- Estimated carbon offset contribution (and associated obligations) of £22,230 (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.

Planning Conditions

To be secured (with detailed wording TBC)

- Energy strategy
- Overheating
- Living roofs
- Water Butts

Carbon Management Response 13/11/2025

In preparing this consultation response, we have reviewed:

- Energy Statement prepared by BWB consulting (dated Nov 2025)
- Overheating Assessment prepared by BWB consulting (dated Nov 2025)
- Relevant supporting documents.

1. Summary

The revised Energy Statement and applicant responses have been reviewed alongside the updated overheating assessment. The proposed development achieves a 77% reduction in regulated carbon emissions on-site, supported by high fabric efficiencies, communal and individual ASHPs, and a 41.65 kWp PV array. To comply with the zero-carbon policy, a carbon offset contribution of £22,230 is required to offset the remaining emissions, which will be secured through the s106 agreement.

The updated overheating strategy is substantially improved and acceptable for planning, demonstrating full compliance for DSY1 2020s with MVHR and tempered air. However, given the high Energy Use Intensity associated with this approach, key passive measures should be integrated upfront rather than deferred to future retrofits to better align with the Cooling Hierarchy and London Plan Policy SI4. This requirement has been secured by condition.

2. Updated Energy Strategy

The updated energy strategy provides further information on the high Energy Use Intensity of the proposed development. The reported EUI is 43.68 kWh/m²/year, which exceeds the GLA benchmark of 35 kWh/m²/year. The report attributes this to:

- Communal heating system for Block A & B.
- Mechanical ventilation with heat recovery (MVHR) required for overheating compliance due to acoustic constraints.

 Unregulated energy demand, accounting for around 40% of total EUI, driven by occupant behaviour.

The high EUI indicates elevated operating energy costs, and reduced alignment with GLA performance targets. Therefore, it is recommended to further explore passive design measures to reduce reliance on MVHR (e.g.: external shading, etc).

Fabric Energy Efficiency improvements range from **–0.74% to +11.43%**, showing inconsistency across units. Such disparity undermines equitable energy performance across units. Applicant notes variation due to dwelling size, orientation and position.

Therefore, it is recommended to adopt a tailored approach to improve TFEE for units with negative or minimal improvement aiming to narrow the TFEE improvement range, prioritising higher performance where feasible.

3. Updated Overheating Strategy

The applicant has addressed previous concerns and submitted an updated CIBSE TM59 assessment using London Weather Centre DSY1, DSY2, DSY3 and future scenarios (2050 & 2080). The modelling covers 93 habitable rooms, including top-floor and southfacing dwellings, and demonstrates compliance with TM59 criteria when MVHR with tempered air is applied.

Passive measures have been incorporated where feasible, including external shading via balconies, low g-value glazing, and energy-efficient façades. Natural ventilation results are reported to evidence optimisation of the façade design in line with the Cooling Hierarchy.

The report includes sample dwelling layouts, communal corridor assessment, a retrofit plan for future/extreme weather, and a heatwave user guide. Future scenarios show strong resilience (98.9% pass for 2050 and 89.3% for 2080), with clear mitigation strategies outlined.

Results are listed in the table below.

Scenario	Compliance	Remarks
Natural Ventilation (DSY1)	96% pass	Some bedrooms fail which indicates that passive design has not been fully explored.
Mechanical Ventilation only (DSY1)	4.3% pass	Significant overheating risk if no tempered air.
MVHR with Tempered Air (DSY1)	100% pass	All rooms comply with TM59 criteria.
MVHR with Tempered Air (DSY2 & DSY3)	100% pass	Good performance under short/long heatwaves.
Future DSY1 2050	98.9% pass	1 LKD fails marginally in future scenarios
Future DSY1 2080	89.3% pass	10 rooms fail; retrofit measures recommended.

However, reliance on MVHR with tempered air remains necessary due to acoustic constraints, and the updated energy assessment indicates a high Energy Use Intensity (EUI) associated with this approach. It is therefore recommended to integrate key passive measures upfront rather than as future retrofits—such as additional

external shading and reduced glazing ratios—to better demonstrate compliance with the Cooling Hierarchy and London Plan Policy SI4. This has been conditioned.

4. Planning Obligations Heads of Terms

- Be Seen commitment to uploading energy data
- Energy Plan
- Sustainability Review
- Estimated carbon offset contribution (and associated obligations) of £22,230 (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.

5. Planning Conditions

Energy strategy

The development hereby approved shall be constructed in accordance with the Energy Statement prepared by BWB consulting (dated Nov 2025) delivering a minimum 77% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, Communal and individual air source heat pumps (ASHPs) and a minimum 41.65 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 zerocarbon policy requirement in line with the Energy Hierarchy;
 - Confirmation of the necessary fabric efficiencies to achieve a minimum 29% reduction;
 - Further explore measures to reduce the Energy Use Intensity:
 - Confirmation of improvement of the TFEE for units with negative or minimal improvement aiming to narrow the TFEE improvement range, prioritising higher performance where feasible;
 - 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 PVs; how overheating of the panels will be minimised; their peak output (kWp) and annual energy generation (kWh/year); 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.

Overheating

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, confirm the mitigation measures, and propose a retrofit plan. This assessment shall be based on the Overheating Assessment prepared by BWB consulting (dated Nov 2025) as a starting point, taking into account the outstanding requirements at application stage.

This report shall include:

- Updated modelling of all relevant units in accordance with CIBSE TM59, using CIBSE TM49 London Weather Centre DSY1-3 (2020s) and DSY1 2050s and 2080s high emissions, 50% percentile, for both openable and closed window scenarios.
- Demonstration that the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, including:
 - Natural ventilation scenario (without MVHR tempering) to evidence passive design optimisation (openable windows scenario).
 - Mechanical ventilation scenario with maximised passive measures to reduce reliance on MVHR tempering (closed window scenario).
- 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.
- A heatwave plan and Home User Guide for occupants.
- (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:
 - Mechanical Ventilation with Heat Recovery (MVHR) with tempered air,
 - Summer bypass function on MVHR units to avoid heat recovery during warm periods;
 - Low g-value glazing (0.35–0.40);
 - External shading via balconies as integrated into the façade design:
 - Insulated hot water pipework and MVHR units located in utility cupboards to minimise internal heat gains;
 - Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.

If the design of Blocks are amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.

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.

Living roofs

- (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 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays:
- v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with root ball of plugs 25cm³) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living 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.
- viii) A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;
- (b) Prior to the occupation, evidence must be submitted to and approved by the Local Planning Authority that the living roof 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.

Water Butts

No dwelling shall be occupied until details of the location of a water butt of at least 120L internal capacity to be installed to intercept rainwater draining from the roof of each dwelling has been submitted to and approved in writing by the Local Planning Authority and subsequently provided at each dwelling. The approved facilities shall be retained.

Reason: To reduce the risk of flooding and demand for water, increase the level of sustainability of the development and in line with Haringey Local Plan Policy SP5, DM21, DM24 and DM25.

Conservation

The application site lies partially within the Trinity Gardens Conservation Area, adjacent to the locally listed building, the former Fishmongers Arms. The building also lies within the setting of several GII Listed buildings, including the trough to the front of the Fishmongers Arms, the Church of St Michael and All Angels, Trinity Primary School, Braemar Avenue Church. The locally listed Greek Orthodox Cathedral of St Mary also lies in the site's context.

The spires and cupolas of the buildings within Trinty Gardens (Church of St Michael and All Angels, Trinity Primary School, Braemar Avenue Church, and the Greek Orthodox Cathedral of St Mary) form an important part of the townscape, particularly around the gardens themselves, the spire of Church of St Michael and All Angels forms a landmark along the High Street, particularly when approaching form the North and the prominence of these features as an important part of their significance should be maintained. The existing site is in use as a timber yard, whilst low level and not a dominant site as existing, the clutter associated with its use, stacked materials and racking, clutter the streetscene which is minorly detrimental to the setting of the GII water trough, the locally listed Fishmongers Arms, and this part of the Conservation area.

The scheme has been progressed significantly during the preapplication discussions and further refined at application stage. The Comments noted

building line has been designed to allow the Fishmongers Arms to remain visible and the spire of the GII listed Church of St Michael and All Angels to remain as a landmark feature when approaching from the north. This also maintains these buildings as identifiable markers of the beginning of the Trintiy Gardens Conservation Area. Building heights have been brought down to more algin with the adjacent buildings, including the locally listed building, and this means the development is not a dominant addition.

The provided viewpoints have shown that the proposed buildings will be visible from Trinity Gardens. Whilst these will sit above the existing C19 houses which line the open space, it would not obstruct any of the views of the existing listed buildings, nor are they large enough to be dominant additions and would maintain the ability to appreciate the spires and cupolas which mark the Conservation Areas. The buildings would fit in with a pattern of existing larger buildings siting on the edge and just outside of the Conservation Area. Whilst these existing older blocks are visible, their most conspicuous characteristic is generally the poorly considered plant and rooftop additions. The parapet and plant on the roof of the proposed buildings have been designed into the whole building which will improve the appearance of the rooftop additions and reduce their visibility. This approach will prevent them from detracting from the Conservation Area. This will need to be controlled through the detailed design stage as the mechanical requirements of the building are refined and should be subject to a condition on the permission.

The massing of the buildings has been reduced and formed around providing a softer transition towards the locally listed building, staggering down in height to align with a smaller 'link' element. The geometries of the balconies and the different floor heights have been negotiated well and the section provided shows that the series of terraces are set back and allow the locally listed buildings features to remain appreciable from the street and in medium range views. The sign from the Fishmongers Arms is shown as being relocated on the building, its retention and relocation should be appropriately ensured. The architectural treatment of the development has been designed to not compete with the adjacent buildings and the approach outlined in the design and access statement is supported, high quality detailed design and materials should be ensured through condition.

The loss of the visual clutter to the street, removing the stacking and material stacks associated with eh sites current use would be a welcomed beneficial impact to the locally listed Fishmongers Arms, GII listed Trough and to this section of the Conservation Area. The impact on views from further within the Conservation Area would cause some minor harm to the significance of the Trinty Gardens Conservation Area through the additional massing above the C19 buildings, however the impact of this additional taller massing has been mitigated to some degree by ensuring the plant and roofscape of the new buildings is controlled to minimise any visual clutter and the conspicuousness of this additional massing, ensuring it is a background element in views. Since the spires and cupolas remain important features of the roofscape, the proposal would have a neutral impact on the significance of Church of St Michael and All Angels, Trinity Primary School, Braemar Avenue Church and the Greek Orthodox Cathedral of St Mary.

	Overall, taking into account and balancing all aspects of the scheme,	
	the development would have a resultant neutral impact on the	
	identified affected heritage assets, and the scheme would be	
	supported by Conservation.	
Design Officer	Site Location & Context	Comments
_	1. The site is currently used as a timber and other building	noted
	materials merchants, in a series of walled outdoor yard spaces	
	and irregular low rise buildings, extending into an area of	
	adopted highway in front of their site on the Wood Green High	
	Road frontage. The High Road is one of the main north-south	
	arterial streets of Haringey, and in this location is just to the	
	north of the major metropolitan centre of wood green, and	
	more immediately the borough's Civic Centre, in a precinct of	
	civic and community buildings amongst parkland, but the High	
	Road becomes a predominantly residential street,	
	interspersed with occasional retail and community uses from	
	the former Fishmongers Arms, the site's immediate neighbour	
	to the south, continuing northwards.	
	Immediately north of the current timber yard, a cul-de-sac	
	mews street, Neville Place, runs off the High Road, and on the	
	north side of this, beside the High Road, the applicants also	
	own an irregularly shaped plot, currently used for parking.	
	Behind this, fronting Neville Place, a two storey building	
	contains workspace, whilst north of this, fronting the High	
	Road, is Morant Place, a council housing block. Designed by	
	the modernist architect Ivor Smith, most renown for Sheffield's	
	Park Hill Estate, this block lacks that estate's sense of	
	composition; it fronts the High Road with four storeys of	
	repetitive living room and bedroom windows and a strip of	
	landscaping, but is accessed via a gated raised plaza from the	
	north, and although it steps back behind the applicants'	
	irregular shaped block, it has no interaction with either this	
	application site or the street other than overlooking and gated	
	pedestrian fire escape/servicing entrances.	
	Principle of Development	
	3. Although not an allocated site, the proposal is not overly	
	constrained by many planning designations, other than being	
	partly within the Trinity Gardens Conservation Area. For built	
	heritage conservation comments, refer to the Conservation	
	Officers.	
	4. It is approximately 300m from Wood Green Underground	
	Station, and with frequent bus services on the High Road	
	itself is in a highly sustainable location, and is surrounded by	
	predominantly residential development, but also including	
	retail, civic, and community facilities. It is clear that this	
	proposal represents a significant opportunity to regenerate a	
	constrained, partially high street fronting, partially backland	
	site, close to the Wood Green Metropolitan Centre, delivering	
	new housing in accordance with the adopted Local Plan and	
	emerging Local Plan objectives.	
	5. The site has been subject to pre-application discussions and	
	Quality Review Panel (QRP) scrutiny, resulting in a well-	
	considered scheme that the panel consider responds	
	positively to policy requirements for housing delivery, urban design quality, and amenity provision.	
	Streetscape Character & Pattern of Development	
	6. The site sits on the High Road frontage and extends to the	
	rear, accessed via the enlivened existing mews street. The	
	real, accessed via the chilivened existing mews street. The	

- High Road frontage contains the public entrances to the two taller flatted blocks, whilst refuse, cycles and plant are accessed around their sides and rear. The third block, along the south side of Nevile Place, contain individual front doors to the ground floor flats and upper floor maisonettes, as well as ground floor kitchen windows and bench window seats, bringing considerably greater animation as well as significantly tidying up this mews street.
- 7. A gated landscaped court separate the southern High Road block from the flank of the mews block and back gardens of existing houses to the south, with a second landscaped space for residents of this development takes up the angled space on the High Road frontage north of the northern High Road block. This will add greenery and resolve irregularities to the High Road frontage at the transition to the frontage to Morant Court. In front of the southern block, the land currently used by the timber yard will be recovered by Highways; it is to be hoped this can be used for public landscaping, potentially alongside cycle parking and/or EV charging spaces, but this is outside of the scope of this project.
- 8. How the proposals meet the existing former Fishmongers Arms pub has been exceptionally carefully thought about, with the differences in levels created by the standard residential floor heights of this development successfully matched to the higher floor heights of the former pub, the rhythm and set backs of the side wing of the pub matched in the development, and provision made for relocation of the historic pub sign surviving on its flank wall included. The irregular site shape and proximity to existing neighbours have strongly influenced the design approach, requiring careful consideration of privacy, daylight, and massing.

Height, Bulk and Massing

- 9. The scheme proposes three blocks ranging from three to five storeys, arranged to create a new High Road frontage, further animating the existing internal mews street and providing communal amenity in two landscaped courtyards. The High Road frontage is graded with a distinct base, middle and top to follow the pattern of traditional buildings along this major arterial street and enhance its human scale.
- 10. The massing strategy successfully mediates between the taller High Road context and the lower-scale residential hinterland, avoiding abrupt transitions. The stepped heights and articulated building forms help reduce perceived bulk, while maintaining efficient use of the site.

Elevational Composition, Materials and Landscaping

- 11. The architectural language is contemporary yet contextual, drawing on local character through brickwork and robust detailing. Fenestration is well-proportioned, with generous openings to maximise daylight and provide visual interest. Balconies are integrated into the façade composition rather than appearing as add-ons, and materials have been selected for durability and quality, subject to confirmation of materials samples to be secured by condition.
- 12. Landscaping is a strong feature, with a central communal space incorporating play areas, seating, and new tree planting, as well as the more densely planted space to the north on the High Road frontage, providing defensible space between ground floor flats and the High Road frontage,

mediate the awkward boundary between the site and Morant Court, and to offset the loss of existing trees.

Residential Quality, including Space Standards, Privacy, Day and Sunlight

- 13. All units meet or exceed the Nationally Described Space Standards, and layouts have been refined to maximise dual aspect opportunities, with an exceptionally high proportion of dual and triple aspect homes achieved for a relatively high density development following a relatively traditional, street-enclosing, tight-block urban form. Private amenity space is provided for all homes, via courtyard gardens, balconies, and roof terraces, supplemented by the two private communal landscaped amenity areas. Privacy has been carefully managed through window positioning and use of obscure glazing and angled projecting oriel windows where necessary.
- 14. Daylight and sunlight analysis demonstrates high compliance with BRE guidance, with 99% of windows to neighbouring residential properties found to be unaffected by the proposed development, and the few affected only falling very marginally below their existing levels. A large proportion of existing neighbouring public and private amenity spaces will also be unaffected, with the majority of 18% affected still receiving as adequate levels of sunlight as defined in the BRE Guide.
- 15. The applicants' consultants' assessment finds that 100% of the proposed amenity spaces will receive adequate sunlight, and that all habitable rooms in the proposed development will receive adequate daylight and 94% of relevant habitable rooms will receive adequate sunlight, as defined in the BRE Guide. Given that the BRE Guide is written with suburban development patterns in mind, the day and sunlight achieved is considered exceptionally good for a high-density development in a heavily built up area of London.

Conclusions

This is a well-designed, policy-compliant scheme that makes efficient use of a challenging site to deliver high-quality housing and public realm improvements. The proposals exhibit a coherent architectural language, appropriate massing, and strong attention to residential amenity. Subject to detailed conditions on materials and landscaping, the application is supported on design grounds.

Lead Local Flood Authority

Thank you consulting us on the above planning application reference number HGY/2025/1769 for Demolition of the existing (B8) buildings and structures and erection of three residential (C3) buildings of three to five storeys comprising 36 new residential units, with landscaping including child play space, cycle parking, parking, removal of 8 trees and planting of 14 trees at 289-295 High Road, Wood Green, London, N22 8HU.

Having reviewed the applicant's submitted Drainage Strategy Report reference number 25235-VTX-00-XX-RP-C-0001 Revision: 01 dated 30th May 2025 as prepared by Vertex Engineering Limited, we are generally content with the overall methodology used and mentioned within the above report, subject to following planning conditions to be implemented regarding the Surface water Drainage Strategy and it's management and maintenance plan.

Surface Water Drainage condition

Conditions attached

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:

- 1) Calculations including the Network Diagram cross referencing drainage elements confirming a full range of rainfall data for each return period for 7 days 24 hours provided by Micro drainage modelling or similar simulating storms through the drainage system, with results of critical storms, demonstrating that there is no surcharging of the system for the 1 in 1 year storm, no flooding of the site for 1 in 30 year storm and that any above ground flooding for 1 in 100 year storm is limited to areas designated and safe to flood, away from sensitive infrastructure or buildings. These storms should also include an allowance for climate change.
- 2) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method.
- 3) An evidence from the Thames Water confirming that the site has an agreed rate and point of discharge.
- 4) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development.

Reason: To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter.

Management and Maintenance condition

Prior to occupation of the development hereby approved, a detailed management maintenance plan for the lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained.

Reason: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system

I hope the above is helpful. Please do not hesitate to contact me should you require any further information.

Noise	No objection	
Pollution	Thank you for contacting the Carbon Management Team (Pollution) regarding the above application for the demolition of the existing (B8) buildings and structures and erection of three residential (C3) buildings of three to five storeys comprising 36 new residential units, with landscaping including child play space, cycle parking, parking,	Comments noted – conditions and informatives

removal of 8 trees and planting of 14 trees at 289-295 High Road, Wood Green, London, N22 8HU and I would like to comment as it relates to matters of this service as follows.

Having considered the relevant applicant submitted information including, Design and Access Statement with reference 3613, prepared by Stockwool, dated 24 June 2025; Energy Statement with reference WTY-BWB-ZZ-XX-RP-BP-0002 Energy Statement, prepared by BWB Consulting Ltd., dated 5 June 2025, taking note of the proposal to install heat pumps and solar photovoltaic panels; Air Quality Assessment with reference WTY-BWB-XX-ZZ-LA-RP-0001-AQA, prepared by BWB Consulting Ltd, dated 23 May 2025 taking note of Section 3 (Methodology), 4 (Baseline Conditions), 5 (Construction Phase Dust Assessment), 6 (Operational Phase Mitigation), 7 (Air Quality Neutral Assessment); Contaminated L:and Desk Study with reference J25126 prepared by Geotechnical & Environmental Associates Ltd., dated 21 May 2025, taking note of Section 2 (The Site), 3 (Ground Conditions), 4 (Risk Assessment), 5 (Conclusions), please be advised that we have no objections 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. Land Contamination Before development commences other than for investigative work:

- a) Using the information submitted in Contaminated Land Desk Study with reference J25126 prepared by Geotechnical & Environmental Associates Ltd, a site investigation shall be designed for the site. The investigation must be comprehensive enough to enable: an updated risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements. The updated risk assessment and refined Conceptual Model along with the site investigation report, shall be submitted and approved in writing by the Local Planning Authority. b) If the updated risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements and any post remedial monitoring, using the information obtained from the site investigation, shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. The remediation strategy shall then be implemented as approved.
- c) Before the development is occupied and where remediation is required, a verification report demonstrating that all works detailed in the remediation method statement have been completed shall be submitted to and approved in writing by the Local Planning Authority.

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

2. Unexpected Contamination

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

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

3. NRMM

- a) Prior to the commencement of the development, evidence of site registration at http://nrmm.london/ to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560 kW to be uploaded during the construction phase of the development shall be submitted to and approved by the Local Planning Authority.
- b) Evidence that all plant and machinery to be used during the demolition and construction phases of the development shall meets Stage IV of EU Directive 97/68/ EC for both NOx and PM emissions shall be submitted to the Local Planning Authority.
- c) During the course of the demolitions, site preparation and construction phases, an inventory and emissions records for all Non-Road Mobile Machinery (NRMM) shall be kept on site. The inventory shall demonstrate that all NRMM is regularly serviced and detail proof of emission limits for all equipment. All documentation shall be made available for inspection by Local Authority officers at all times until the completion of the development.

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

4. Management and Control of Dust

No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved in writing by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment. The works shall be carried out in accordance with the approved details thereafter.

Reason: To Comply with Policy 7.14 of the London Plan and GLA SPG Dust and Emissions Control.

5. Considerate Constructors Scheme

Prior to the commencement of any works the site or Contractor Company must register with the Considerate Constructors Scheme. Proof of registration must be submitted to and approved in writing by the Local Planning Authority. Registration shall be maintained throughout construction.

Reason: To Comply with Policy 7.14 of the London Plan.

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.

Transportation

Development proposal

This application is for redevelopment of the Wood Green Timber site on Wood Green High Road. The existing site includes 1,200 sqm of Class B8 use operated as a timber yard by the 'Wood Green Timber Co Ltd'. The site includes the existing buildings plus a yard and parking areas.

The proposal includes demolition of the existing buildings and redevelopment to include two residential blocks of up to five storeys that will front the High Road (Blocks A and B) and a three storey mews building to the rear (Block C). Blocks A and B are separated by the retained Neville Place. The scheme includes 36 residential units, broken down as follows;

- Block A 7 No. 1 bed, 6 No. 2 bed, 1 No. 3 bed
- Block B − 8 No. 1 bed, 4 No. 3 bed
- Block C 5 No. 1 bed, 5 No. 3 bed

In total

- 20 No. 1 bed
- 6 No. 2 bed
- 10 No. 3 bed.

Three of the above units will be fully accessible.

The development is proposed as car free/permit free, with (initially) a single blue badge space within curtilage, and the ability to provide three within curtilage if demand arises. Cycle parking will be within stores in blocks A and B and within curtilage of the individual units in block C.

Location and access

This site is located to the western side of the Wood Green High Road, in between the junctions with Trinity Road and Neville Place. The existing vehicle access is via Neville Place. A private car parking area for the business is opposite the site on the northern side of Neville Place.

The site has a PTAL value of 6A, considered 'excellent' access to public transport services. 12 bus services are available within 1 to 8 minutes' walk of the site and Wood Green Underground Station is a 6 minute walk away.

The site is at the southern boundary of the Bounds Green East CPZ (Monday to Friday, 11.00 to 13.00) and close to the northern boundary of the Wood Green Outer CPZ (Monday to Saturday, 0800 to 1830).

<u>Transportation considerations</u>

A Transportation Assessment accompanies this application.

Trip Generation

The TA includes a trip generation for the residential redevelopment. this predicts a total of 135 inbound and 137 outbound person trips a day. The person trips generated in the AM and PM peaks will not be problematical in highway and public transport capacity terms.

A comparison has been made with a similar trip generation exercise for the existing land use, and this details that in the peaks combined,

Clarification to the following: Travel Plan figure (corrected to £3000 over 5 years). PMP best way to address future provision of parking and secure this through S106. Car Club missed off of HoTs but should be included. £50 car club voucher rather than £100 would be okay

there will be 21 more inbound trips and 19 more outbound trips. Essentially the trip generation in terms of numbers is slightly increased, however there will be far fewer vehicle trips on the network overall given the car free nature of this residential development compared against the vehicle trips generated by the timber yard.

Car parking

This application is proposed as 'car free' and 'permit free', with one off street blue badge bay included from the outset. It is noted that two additional bays are able to be provided by converting elements of the landscaped area.

Given the site's location and PTAL value of 6A, it would meet policy DM32 for formalising as car/permit free. The applicant will need to enter into the appropriate Planning Agreement to do so and meet the Council's costs of £4000.

The TA includes a parking stress survey.

The overnight survey (on two nights) recorded a highest parking stress within the 200m walk distance of 51%, with 129 spaces occupied of the 253 within the survey area. For the second night the stresses were slightly lower at 49%. This indicates considerable spare capacity in the survey area.

A daytime survey (11.00 to 13.00, which is CPZ operational hours) was also carried out for existing parking demands within Neville Place. This recorded maximum occupancy at 7 cars, and averaged out at 6 cars, a stress of 55% for the 11 spaces within Neville Place during CPZ operational hours.

Considering the above, there is considerable spare parking capacity on street with the overnight scenario, which is normally the busiest period for assessing local parking demands. Whilst this proposal will be permit/car free, the area to the north of the site does only have two hours of operational CPZ during the day, and any new parking demands generated, whilst expected to be small, could seek to park in the locality. The spare capacity recorded means that there should not be any adverse impacts resulting from additional on street demands materialising.

Access arrangements

Blocks A and B fronting the High Road will be accessed from the High Road, and the houses/mews component directly from Neville Place. Refuse collections and delivery/service access is intended to be from Neville Place, as will vehicular access to the blue badge parking for the accessible units, which will be located off the highway within curtilage to the south side of Neville Place.

In order to access the off street blue badge parking, an existing parking bay within Neville Place will be removed. This has been considered and in order to assess pedestrian and highway safety, a Stage 1 safety Audit has been undertaken to assess intervisibility between vehicles and pedestrians. This indicates that the proposed arrangement should have sufficient intervisibility and be a safe arrangement.

The applicant proposes provision of the single blue badge bay at first, with the ability to provide two more if demands arise and occupiers request. The detail within the TA shows the three bay arrangement,

with the bays accessed via a crossover/dropped kerb. The London Plan requires the ability to provide a dedicated blue badge bay for each fully accessible unit within the development site.

A S278 agreement will be required to arrive at the future highway arrangements for this development, which includes the amendments to Neville Place (removal of a single CPZ bay, long dropped kerb and double yellow lines for the blue bay access, the turning head behind block B, and associated streetscape changes/improvements for the hardstanding highway area to the front of block A).

An optimum arrangement for initially providing the single blue badge bay and ease to convert to three needs to be designed in to the permanent highway and development landscaping works.

The developer has undertaken a combined stage 1/2 safety audit, which has considered the revised highway arrangements, and the only aspect requiring resolution was access to the three blue badge bays and the recommendation to implement double yellow lining across the crossover to prevent parking by other vehicles impeding access to the blue badge bays.

Cycle parking

The applicant proposes cycle parking stores at ground floor for blocks A (26 spaces) and B (31 spaces) utilising a mix of two tier and Sheffield stands. It is noted that 3 larger spaces are included. For the mews houses internal cycle storage of either 1 or 2 cycles is proposed (for studio and larger units).

Two visitor cycle parking spaces are proposed, however this are to be in one of the cycle stores (it is not confirmed which one, or both). Visitor cycle parking spaces would therefore need the visitor to get access, normally cycle parking for visitors tends to be openly accessible, near an entrance or similar. More details are needed here.

A pre commencement condition is required to ensure the applicant provides full layout and dimensional details of the proposed cycle parking arrangements, to demonstrate adherence with both the manufacturer's installation specifications and the London Cycle Design Standards as produced by TfL.

Delivery and servicing arrangements

The applicant is proposing almost all delivery and Servicing activity will take place on Neville Place making use of the double yellow lines. The turning head behind block B will enable forward gear access into and out of Neville Place. There is also the area of highway that is the hard standing to the front of Block A, intended for refuse vehicles to dwell in for collections from blocks A and B.

On Neville Place there are two CPZ bays at the location of the yellow lines that will be in place to the immediate east of the 3 blue badge parking bays, so dwelling at that location may obstruct the highway. Otherwise, there are double yellow lines on the high road adjacent to the development component fronting the High Road, and the hardstanding area of highway to the frontage of block A. The applicant needs to be clearer on the proposed location for dwelling delivery and service vehicles, and this can be addressed via a pre commencement condition for a Delivery and Servicing Plan.

Waste and recycling

As touched on above, the waste and recycling collection strategy includes the collection vehicle waiting on the public highway hardstanding area in front of Block A to collect from Blocks A and B. The vehicle will then reverse part-way down Neville Place under banksmen control to collect from Block C. with these arrangements the exit from the development back onto the High Road will be in a forward gear and bin dragging distances do not exceed 10m.

Travel Plan

A detailed draft of a travel plan is included. This appears sound in terms of scope, and contents. Some mode share targets have been included, which are for 5 percent increases in mode share for walking and cycling by year 5 survey. These will be able to be revisited following the initial occupancy survey. The council will require payment of a monitoring free for officers to review and engage with the Travel Plan co-ordinator over the life of the Travel Plan, of £1000 per year the travel plan is active (assumed 5 years). More details are included in the proposed S106 obligation at the end of this response.

Car club

It is suggested that the developer provide a car club facility for this development. Whilst it is located with excellent access to public transport services, it is a car free development and areas to the north of the site are only covered two hours a day during the working week for formal CPZ controls.

This can be covered by the S106, and the applicant should obtain written recommendations from an appropriate car club provider for this development and implement them. It is expected this will include memberships for three years plus a driving credit for each unit, and potentially provision of a car/space within the locality of the site.

Construction phase

A draft CLP has been included within the application, this is useful and helpful and provides a template for the full pre commencement draft of the CLP that will be required.

The draft includes useful information such as the 90 weeks works duration, estimates of vehicle arrivals and departures (between 9 and 23 per day), confirmation that no plant or materials will be stored on the public highway and the use of banksmen to oversee all vehicle activity. There is also commentary on the proposed temporary loading bay arrangements on the public highway with two bays proposed, one in the hardstanding to block A, the other on Neville Place that will necessitate suspending two CPZ bays.

The final document should expand on the draft and include full details of the agreed temporary suspension and loading bay regime, as agreed with Haringey's Network Management officers, and confirm that all arrivals and departures will be contained to between 0930 and 1500. Details of the numbers of banksmen and their oversight regime will also be required to demonstrate how there will be full supervision of both construction vehicles and highway users as manoeuvres and access/egress is made.

<u>Transportation contribution</u>

The Council is currently progressing designs for a junction improvement scheme at the junction of White Hart Lane and Trinity Road, to the immediate south of this site. This scheme will include measures to improve facility and safety for pedestrians and cyclists and improve connectivity to cross the High Road and make journeys east/west to and from the development. The junction will be signalised to manage vehicle movements through the junction, and formal pedestrian crossings along with advanced stop lines for cyclists and improved footway and tactile crossings will be implemented

This will be of direct benefit to this scheme and the future occupiers. Accordingly, transportation consider a financial contribution of £80,000 appropriate towards the design and implementation costs.

Summary

This application is for redevelopment of the Wood Green Timber Yard on Wood Green High Road, to provide a car free residential redevelopment containing 36 units. The site is well located for local shops and services, and has excellent public transport accessibility.

Cycle parking will be required to meet London Plan and London cycle design standards, clarity is needed in relation to the proposed arrangements for which a pre commencement condition is included. Clarity is also required with respect to the delivery and servicing arrangements, again this can be covered by pre commencement condition.

A worked up Construction Logistics Plan will also be required given the site's access/location off the SRN. It is suggested car club provision is made for this development too.

Subject to the following S106 obligations and conditions, Transportation do not object to this application.

S106

Car-Free Agreement

The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as "car free" and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose.

Reason: To be in accordance with the published London Plan Policy T6.1 Residential Parking, and to ensure that the development proposal is car-free and any residual car parking demand generated by the development will not impact on existing residential amenity

Travel Plan

Within six (6) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses shall have been submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance

with a timetable of implementation, monitoring and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan in order to maximise the use of public transport:

- a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years.
- b) Provision of welcome induction packs containing public transport and cycling/walking information to every new resident, along with a £200 voucher for active travel related equipment purchases.
- c) The applicant is required to pay a sum of, £3,000 (three thousand pounds) for five years £15,000 (fifteen thousand pounds) in total for the monitoring of the travel plan initiatives.

Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.

Construction Logistics and Management 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 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 £5,000 (five thousand pounds) to cover officer time required to administer and oversee the temporary 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.
- c) Estimates for the number and type of parking suspensions that will be required.
- d) Details of measures to protect pedestrians and other highway users from construction activities on the highway.
- e) The undertaking of a highway dilapidation survey.
- f) The implementation of the Construction Logistics and Community Safety (CLOCS) standard.

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 Wood Green area 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.

Sustainable transportation contribution

The applicant is to make a payment of £80,000 to contribute towards progressing the design and implementation of a junction improvement scheme at the junction of White Hart Lane and Trinity Road.

Reason;_To contribute towards improving connectivity and the environment for pedestrians and cyclists and provide a safe highway

junction for all highway users. This will assist in improving walking and cycling mode shares and the aspirations of the Mayor's Transport Strategy.

Highway Improvements

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.

Unavoidable works required to be undertaken by Statutory Services will not be included in the Highway Works Estimate or Payment. The developer will be required to provide details of any temporary highways scheme required to enable the occupation of each phase of the development, which will have to be costed and implemented independently. The works include but are not limited to the removal of the crossover to the site to reinstate the footway and the creation of any on-street disabled car parking bays which will require electrification.

The developer will be required to enter into the S.278 agreement before works commence on site.

Reason: To implement the proposed highways works to facilitate future access to the development site.

Conditions:

Cycle Parking

The applicant will be required to submit to the Highway Authority plans showing 81 accessible; sheltered, and secure cycle parking for long-stay residential cycle spaces, with 3 residential long-stay spaces being located in a more accessible location for approval.

Reason: In order to be in accordance with the published London Plan 2021 Policy T5, the cycle parking must be in line with the London Cycle Design Standards (LCDS).

Delivery and servicing plan

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 deliver plan must also include a waste management plan which includes details of how refuse is to be collected from the site, the plan should be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying distances of a refuse truck on a waste collection day.

Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway.

4. Electric Vehicle Charging

Subject to a condition requiring the provision of 1no. active electric vehicle charging points to serve the on-site parking spaces from onset.

Reason: to be in accordance with published London Plan 2021

Additional justification of the 80K Highways requirement:

This contribution of £80,000 is sought towards the design and implementation costs of the White Hart Lane to Lordship Lane corridor scheme that will connect west to east and includes measures at the Trinity Lane/High Road/Lordship Lane junction immediately to the south of this development site.

The applicant has counter offered a contribution of £20,000, based on a numerical comparison of the numbers of trips predicted to be generated by this development with the civic centre development.

Transportation however do consider that this development is a different type of development to the Civic Centre, and that trips will not be as focussed on the traditional AM and PM peaks, they will be spread throughout the day. This scheme that is being developed will provide multiple measures that will provide a safer/calmer highway environment for all users, in particular pedestrians and cyclists, through the introduction of signalised pedestrian/cycle crossings, raised side road crossings for pedestrians and marking/signage along this route. These measures will directly benefit the development and future occupiers of and visitors to it.

This development will be a car free residential development and given the zero parking available, and high PTAL, will generate trips almost completely to be by foot/cycle to and from the site, considering last steps from public transport services and walk/cycle trips to local shops and facilities. The scheme also provides mitigation for potential additional parking demands.

We consider the amount initially sought to be appropriate, the proposal to contribute a quarter of the amount sought is underplaying the importance of how the scheme will provide a considerable improvement in facility and infrastructure for active and sustainable modes.

With regards to alignment with the NPPF criteria, we consider the contribution sought to be fair, reasonable, and proportionate. The Mayor's Transport Strategy seeks an increase in the mode share of active travel modes to 85 % of all trips by 2041, and this scheme would help align with these objectives, so the development and introduction of this scheme would considerably enhance the route from the development in all directions particularly to Wood Green town centre and public transport facilities.

Haringey's Walking and Cycling Action Plan aligns with the Mayor's Transport Strategy, and in particular it identifies providing continuous, accessible, and intuitive walking and cycle routes is essential in the development of successful networks. Barriers such as crossing busy roads need to be overcome to do this such as the scheme will provide.

Many other developments within Haringey are also making financial contributions towards similar scheme to improve active travel and road safety facilities and mitigate potential increases in parking demands, as well as the Civic centre redevelopment already referenced.

These include;

175 Willoughby Lane – 5600 sqm of B2/B8 space, a £120,000 contribution towards improvement of pedestrian crossing facilities at the Dysons Road/Leeside Road/Willoughby Lane/Brantwood Road junction plus £50,000 contribution towards feasibility and design of the Brantwood Road protected cycle track facility

<u>Broad Lane office redevelopment</u> – 5536 sqm office space - £60,000 contribution towards a scheme that provides an improved east – west corridor to Tottenham High Road, and includes a formalised signal crossing of Broad Lane, adjacent to the development site thus providing a safe pedestrian crossing of a TLRN road, encouraging walking and cycling and an improved route east/west.

37 – 39 West Road – 5989sqm B2/B8 commercial space - Parking management contribution of £24,000

<u>103 – 107 North Hill</u> – construction of a 50 bed care home/rehabilitation facility, £20,000 contribution towards enhanced parking controls

<u>18 West Road & Unit 4 West Mews, Tottenham</u> – walking and cycling contribution of £25,000 and £40,000 towards improvement of parking enforcement/monitoring CCTV.

Therefore, it is considered that the contribution sought is reasonable, proportionate, and fair, and it will help in achieving the aims of TfL's and Haringey's policies and directly benefit this development.

Waste Management

Application Summary

- Proposal: Demolition of existing B8 buildings and erection of three residential buildings (C3 use class) of 3–5 storeys, comprising 36 residential units.
- Site Features: Includes landscaping, child play space, cycle parking, vehicle parking, removal of 8 trees, and planting of 14 new trees.

Waste Management Strategy Overview

To ensure the development aligns with Haringey Council's waste and recycling policies and supports sustainable urban living, the following waste strategy is proposed:

- 1. Waste Storage Provision
- Residential Units: Each block will be provided with dedicated refuse and recycling storage areas, sized in accordance with the London Plan and Haringey's Waste Storage Guidance.
- Updated Waste Storage Requirements (Based on Haringey Standards)
- 1. Refuse (1 x 1100L per 6 dwellings):
- 36 dwellings \div 6 = 6 x 1100L Eurobins
- Total Refuse Capacity: 6,600L
- 2. Recycling (1 x 1100L per 10 dwellings):
- 36 dwellings \div 10 = 3.6 \rightarrow rounded up to 4 x 1100L Eurobins
- Total Recycling Capacity: 4,400L
- 3. Food Waste (1 x 140L per 23 dwellings):
- 36 dwellings \div 23 = 1.56 \rightarrow rounded up to 2 x 140L bins
- Total Food Waste Capacity: 280L
- · Allocated to BIN STORE A, B and C
- Bin Types: Eurobins (1100L) for refuse and recycling; smaller caddies or 240L bins for food waste.
- Bin Stores: Secure, ventilated, and easily accessible to residents

Condition attached. Building Control covers details of stores in terms of ventilation etc.

and collection crews. Located within 10m of the highway for collection efficiency.

- 2. Collection Arrangements
- Frequency: Weekly collections for general waste, recycling, and food waste.
- Access: Collection crews will not enter buildings; bins must be presented at the kerbside or designated collection point (Bin Store)
- Vehicle Access: Swept path analysis must confirm that refuse vehicles can safely access and exit the site without reversing over long distances.
- 3. Design Considerations
- Waste Store Location: Stores will be located on the ground floor, with direct access to the street or service road.
- Ventilation & Hygiene: Stores will be ventilated and designed to prevent pest infestation and odour issues.
- Signage: Clear signage for residents to encourage correct waste separation.
- 4. Bulky Waste & Clinical Waste
- Bulky Waste: A designated area will be provided for temporary storage of bulky items awaiting collection.
- Clinical Waste: Residents requiring clinical waste services will be supported via Haringey's existing collection arrangements.
- 5. Recycling & Sustainability
- Education: Residents will be provided with welcome packs detailing waste and recycling procedures.
- Sustainability: The strategy supports Haringey's climate action goals by promoting high recycling rates and reducing landfill dependency.

Conclusion

This waste strategy ensures that the proposed development at 289–295 High Road meets all operational and environmental requirements for waste management. It supports efficient collection, resident convenience, and long-term sustainability.

EXTERNAL CONSULTATIONS

Designing Out Crime

Section 1 - Introduction: With reference to the above application, we have had an opportunity to examine the details submitted and would offer the following comments. observations 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). At this stage we have not met with the original project Architects to discuss Crime Prevention and Secured by Design at pre-application stage to discuss our concerns regarding the design and layout of the development. There is no mention of crime prevention or Secured by Design in the Design and Access Statement referencing design out crime or crime prevention. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early. 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. Whilst in principle we have no objections to the site, the venue is located in an area with high footfalls of traffic and a college nearby, resulting in higher levels of

Conditions and Informatives attached. The applicant has attempting to make contact with the MPS and will continue to do so.

crime and anti-social behavior. 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. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.

Section 2 - Secured by Design Conditions and Informative: In light of the information provided, we request the following Conditions and Informative: Conditions:

A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable according to current and relevant Secured by Design guidelines at the time of above grade works of each building or phase of said development. The development shall only be carried out in accordance with the approved details.

B. Prior to the first occupation of each building, or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained. 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 or 0208 217 3813.

Section 3 - Conclusion:

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.

Thames Water

Waste Comments:

Waste Comments: The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) 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

Conditions / informatives attached

works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes:https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Please ensure to apply to determine if a build over agreement will be granted.

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.

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/help/home-improvements/how-to-connect-to-a-sewer/sewer-connection-design

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:

Water Comments: If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at 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. Supplementary Comments:

Please submit a foundation/piling layout plan clearly indicating the locations of all foundation/piles to be installed on the development site. This plan should show the positions of the foundation/piles in relation to Thames Water clean water mains and sewers and local topography such as roads (please include road names), existing buildings and/or any other notable features. Thames Water require drawings indicating the location of all pilling and the clearance between the face of the pile to the face of a pipe. If any basements intended to be constructed as part of the development, please clearly indicate the location and footprint. Without these drawings and cross-sectional details Thames Water will not be able to review your proposals and discharge your planning condition.

The Developer is also requested to confirm whether they have been in touch with Thames Water to discuss or arrange for the abandonment of any existing assets beneath the development site. Please give a short summary of any correspondence to date and any references they have been provided.

Additional Comments:

Thames Water has reviewed this H4 consultation. Your client may require a build over agreement, as we believe the proposed development could be within 3 metres of a public sewer (of which, the internal diameter is less than or equal to 150mm). There are no mapped public sewers in the vicinity, however following the private sewer transfer in October 2011, it is likely that houses of this type and location will have unmapped public sewers within their boundary. We therefore strongly recommend your client employs a professional to conduct a survey within their property to ascertain if any shared pipework is present. If there is, then please do contact us again to discuss the next For more information on locating sewers and drains, watch our video. Watch our guide to the Private Sewer Transfer – note this only applied to existing drains and sewers that existed and were operational in 2011, built since new sewers or drains that Please also advise your client, if applicable, that Thames Water do not permit driven piles within 15m of a public sewer. Our technical guidance can be found here.

Appendix 3: Internal and External consultation representations			