

Appendix 1: Consultation responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Design Officer	<p><u>Location, Description of the site, Policy context</u></p> <p>The site location is in the south-east of the borough, in southern Tottenham, east of the High Road but about the same distance west of the River Lee. The site is just over 400m east of Tottenham High Road, the primary north-south traffic and activity spine through the east of the borough. The nearest point on the High Road to the site is also the major street and public transport node of Seven Sisters, where Seven Sisters Road, West Green Road and Broad Lane all meet the High Road; in addition to plentiful bus routes, this is also a significant interchange Underground (Victoria Line) and Overground station; West Green Road and a short stretch of the High Road at this point also forms a designated District Centre, with a wide range of local and supermarket shops.</p> <p>The site is just less than 200m south of Broad Lane, the nearest major through street, running north-east to south-west from Tottenham Hale to Seven Sisters and intermittently lined with local shopping parades. Stamford Road, a relatively quiet residential street, runs in a straight line due south off Broad Lane, forming the western frontage to this application site; the street continues just a short distance south where it ends in a T-junction with Page Green Road, an even more quiet residential street that ends in culs de sac in both directions, with the embankment of the Gospel Oak to Barking Overground railway line to its south. However Stamford road is joined by Constable Crescent at the corner of the site, running east and forming the southern edge of the site; this is a different street. Of industrial character, this reflects the nature of the site, being at the edge of a large industrial area, the designated “South Tottenham” Employment Area: Regeneration Area (Local Plan: Strategic Policies, as amended from the version adopted 18th March 2013 to</p>	Comments noted.

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	<p>the Pre-Submission Draft Alterations, January 2016).</p> <p>The site therefore has employment land, currently of an industrial character, on two sides, the south (across Constable Crescent) and east (backing onto the site), and residential to the west (two storey, late 19th / early 20th century, terraced houses facing the site on the other side of Stamford Road) and north (four to six storey, mid 20th century, flatted council blocks on the other side of a pocket park adjoining the site). Constable Crescent ends shortly east of the site in a T-junction with Markfield Road, which runs parallel to Stamford Road but is of a yet more industrial character, although undergoing significant transformation; it continues under the railway embankment, providing an access to Markfield Park, a large public park some 200m (via those streets) from the application site.</p> <p>However the nature of the industrial employment land is changing, with cleaner, more creative and more knowledge based business, including offices, artists' studios and light, high-tech manufacturing replacing warehouses, sheds and yards carrying out heavier industry, "metal-bashing", sweatshops, storage and distribution. The industrial property at no. 39 Markfield Road, adjoining the north eastern corner of this site, was recently granted permission for conversion and change of use to artist recording & work pods (B1), various office sublets (B1), enclosed performance space (Sui Generis) and cafe/bar (A4) with associated amenity spaces (HGY/2016/1377), and the council is investigating a coordinated redevelopment of the sites on the south side of Constable Crescent.</p> <p>The small pocket park to the north is one of a number of small public open spaces in this area subject of a community led improvement project; for this park a community group has been set up to carrying out short term improvements to the park, with the intention of using the S106 secured through this development to carry out longer term design changes.</p> <p>The site is within the area covered by the Tottenham AAP (pre-submission draft, January 2016) and is part of a site allocation within that document, as</p>	

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	<p>TH 13 “Constable Crescent”, the larger part of which covers nos. 1 – 7 Constable Crescent on the opposite (south side of the street, continuing to the east. The AAP has been consulted on and subjected to Examination in Public (EiP, August-September 2016), and therefore has significant weight, but as part of the outcome of the EiP, the council has proposed some minor modifications intended to address issues arising in the EiP, including to this allocation. The Planning Inspectorate has stated the Examiner intends to issue her report on the soundness of the plan, including whether to accept the modifications, in April 2017.</p> <p>The allocation, as modified (subject to these being accepted, with additions bold and underlined, deletions crossed out) is:</p> <p><i>“Potential <u>mixed use employment-led</u> development to increase accessibility, provide increased <u>maximise</u> employment floorspace and <u>provision for</u> warehouse living accommodation”</i>,</p> <p>With commentary that:</p> <p><i>“This area has a range of buildings of variable quality which has the potential to accommodate a mix of employment and warehouse living accommodation in the South Tottenham area”</i>,</p> <p>Site Requirements that:</p> <ul style="list-style-type: none"> • <i>“The site will be given <u>is within</u> a Designated Employment Area: Regeneration Area status to reflect the Council’s aspiration <u>and proposals for mixed-use employment-led development will be supported, where appropriate,</u> to create a mix of uses on this site through the re-introduction of creative employment uses.</i> • <i>The quantum of dedicated employment floorspace on the site should be maximised through any development. Residential uses will be permitted only on the Stamford Road frontage to cross-subsidise <u>optimise the delivery of</u> new employment stock, and should be located adjacent to the existing residential</i> 	

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	<p><i>uses adjoining the site.</i></p> <ul style="list-style-type: none"> • <i>Capped commercial rents may be expected in this area in line with Policy DM38.</i> • <i>An element of Warehouse Living will be accepted on this site. This will be required to be in conformity with the requirements of Policy DM39.</i> • <u><i>This site is in an area of flood risk, and a Flood Risk Assessment should accompany any planning application</i></u>, <p>and Development Guidelines that:</p> <ul style="list-style-type: none"> • <i>“Reintroducing suitable employment generating uses is the key aim of this policy.</i> • <i>This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.</i> • <i>Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.</i> • <i>Development along the edge of the retained South Tottenham LSIS area should be employment only, to avoid the creation of unsuitable neighbouring uses.</i> • <i>The creation of development which overlooks the park on Stamford Road will be supported to improve passive surveillance”.</i> <p><u>Principal of Development</u></p> <p>The principle of the land use is established in the Site Allocation as explained</p>	

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	<p>above; mixed use development incorporating residential could be acceptable provided employment is retained. The site allocation guidance talks about development along the edge of the retained South Tottenham LSIS area (bordering the east of the site) being employment only, to avoid the creation of unsuitable neighbouring uses, but the requirement to accommodate the site's flood risk status should take precedence.</p> <p>The applicants are a building contracting company, who state they wish to remain on site but build a bespoke development that meets their changed needs commensurate with changes to the building contraction business in particular they no longer need a "builder's yard" to store materials as suppliers deliver all materials directly to site. Their main need is therefore enhanced quality office space, both for themselves and to let out to others, potentially including specialist consultants and contractors who they work closely with. This has the potential not only to fulfil the letter of the requirements but also the spirit, acting as an incubator to the building industry related knowledge economy, contributing to the enhancement of the employment area.</p> <p><u>Form & Development Pattern</u></p> <p>The proposals are for a <i>podium</i> form of development, with a solid block of ground floor 100% site coverage, topped by a "fractured" perimeter block; formed of four slightly separated blocks aligning with each boundary, lining those in the three of those four cases where the boundary is the street or park, but with gaps between each of those blocks allowing glimpses into the landscaped podium courtyard from surrounding streets and out from that courtyard. The different uses on the site are therefore layered rather than separated in plan; with non-residential and ancillary uses filling the ground floor and all living accommodation above. This has potential disadvantages as well as advantages.</p> <p>Street frontages, especially along otherwise residential Stamford Road, are not enlivened with residential front doors and living room windows, but must</p>	

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	<p>instead rely for the essential characteristic of active frontage on the single communal residential entrance, two commercial entrances and commercial office windows, that later being especially unlikely to be active frontage; they may well be screened to give office workers privacy, and given the street frontages are west or south facing, sun shading. Usefully, the more in need of overlooking, but more private and less likely to be overlooked, park frontage is to the north, so ground floor office windows looking onto the park are likely to provide the right amount of passive surveillance.</p> <p>It is also not ideal to have residential, even at upper floors, close to the boundary of the site where adjoining what could legitimately be in disturbing industrial uses, that could be unacceptable neighbours, and the site allocation guidance recommends against this. But the residential blocks are designed to place sensitive rooms and windows (to living rooms and bedrooms) away from this boundary, whilst windows onto circulation spaces are present to ensure it is not a totally blank facade. The proposed housing is therefore reasonably protected from noise and disturbance on the neighbouring site, whilst not turning a completely blank and potentially ugly facade to the currently low rise buildings.</p> <p>Proposals for this site also have to accommodate the likelihood that its immediate neighbours will change over the coming years, and not prejudice potential developments on those sites. The applicants have shown that a number of different forms of development would be possible on the immediately adjacent site, including blocks as close to the mutual boundary as this application proposes, with a similar layout looking the opposite way; the “mirror test”.</p> <p>The most significant gain from the podium form is it completely removes the concern about flood risk as there would be no ground floor residential accommodation, providing services are installed at suitable height, which would be a matter for detailing. But also, having all the office floorspace on one level allows maximum flexibility of layout and therefore the greatest</p>	

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	<p>chance for parts that are let out being occupied.</p> <p><u>Height, Bulk & Massing</u></p> <p>The height is not unacceptable overall, in my view, and is graded from heights between two and six storeys. Heights start similar to the existing two storey residential context west of Stamford Road, with the block immediately opposite, lining Stamford Road at three storeys, but with the top floor deeply cut into with roof terraces. The southern block, lining Constable Crescent, is of four storeys, with the thin end of this block forming a “bookend” and corner punctuation to Stamford Road. At its highest the proposal rises to six storeys on the eastern and northern block, the latter with its top floor partially set-back. Between these blocks, on the podium and the four gaps between the blocks, it is just of one storey.</p> <p>Much of the existing context is of just two storeys; both the houses on the other side of Stamford Road (and nearby Page Green and Ashby Road), but also most of the existing industrial buildings to the east (and west of Ashby Road). However the next nearest context, the blocks of flats on the north side of the small park immediately north of the site, are of six storeys; these are only 67m away.</p> <p>Furthermore the existing heights in the industrial areas cannot be considered to be a good precedent, as they do not use their sites efficiently or sustainably, generally taking the form of low rise sheds set in large expanses of hard standing, a car friendly but pedestrian unfriendly environment. Significant redevelopment of them is to be expected and planned for in the council’s Development Plan as noted above, sometimes as mixed uses as here, with residential above, otherwise as part of a migration towards more intensive, less extensive, cleaner, more office, knowledge and creative based employment. The Urban Characterisation Study anticipates mid-rise, three to six storeys (12 – 21m high) being suitable on this site and to its east, north and south.</p>	

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	<p>I consider the height proposed further justified by the measures to ensure a transition down to the lower western context within the development, with a three storey, just one additional storey Stamford Road frontage, who's impact is further reduced with the significant cut-outs for roof terraces. This will ensure virtually no overshadowing of those houses, both perceptually and certainly not formally, in the daylight sense. The proposal has maisonettes on this side, so the designs also minimise any overlooking concern by locating bedrooms on their lower level, the same level of the bedrooms of the houses opposite, with living rooms at the neighbours' roof level.</p> <p>The scheme design, in particular the language of cut-outs running through the proposals, assist in minimising its' apparent bulk and massing. This can be seen both at the scheme scale in that above podium it is split into four separate blocks with distinct gaps between, rather than a continuous "perimeter block", and at block level with numerous balcony cut outs, which at intermediate floors reduce the size of elevation planes, especially at corners, and at top floors erode the roofline.</p> <p>The modest height of the proposal and their location away from sensitive visual receptors or any lines of sight to them, means that there has never been any need for distant, or even near distant views of it to be prepared. Nevertheless the applicants have included fully rendered contextual views from nearby, north and south of the site on Stamford Road; in my view these show the proposal would sit comfortably in its local street context.</p> <p><u>Approach to the front door(s), Accessibility & Legibility of the street layout</u></p> <p>As mentioned above, all the flats are accessed off a single residential entrance to the podium; this would be a wide gateway set at the mid-point of the store frontage on Stamford Road and would open into a covered, double height space containing a lift and generous, broad staircase leading directly up to the podium. From the podium flats at that level, including the maisonettes that</p>	

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	<p>make up the western block, have their own front doors. Flats on 2nd to 5th floors in the northern, eastern and southern block are accessed off free-standing stair and lift towers in the gaps between the northern and eastern and eastern and southern blocks. These are angled towards the podium staircase, giving the access routes through the development a logic as well as dynamism from the exploitation of the diagonals.</p> <p>However, apart from the single street entrance, and the contribution of residential to servicing, refuse collection, car and cycle parking (covered below), for street animation the proposals largely rely on the non residential uses. The ground floor employment space is divided into two separate blocks, either side of the residential entrance, service spaces and parking, to the north filling the park frontage and to the south the corner of Stamford Road and Constable Crescent. Each has a wide entrance, with doors and glazed frontage, ideal for a reception area with opportunities for display and waiting, set within a broad, shallow recess. The applicants idea for this it that the sides of the recess form opportunities for signage, and the recess itself provides a slight, visual and psychological separation from the pavement, and a modicum of sun shading, whilst maintaining transparency, interaction and approachability from the street. The recess for the southern office turns the slight corner into the faceted street junction facade, and a third, all glazed recess animates a significant section of Constable Crescent, although this is not further enlivened by doors and could well be screened. None of the three recesses are totally glazed; floor to ceiling glass panels or doors are to be interspersed with several floor to ceiling metal panels or doors, breaking up the glazing giving more privacy and shading, whilst maintaining the appearance of openness and active street frontage.</p> <p>There are also three of utilitarian entrances; doors to bin stores either side of the residential entrances and the archway to the car and cycle parking. The former are cunningly included in the office entrance recesses, so that their metal doors fit into their language of interspersed metal panels, and their outward swing does not obstruct the pavement. Parking is accommodated</p>	

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	<p>along the eastern side of the ground floor plan, all away from street frontage except for the archway entrance off Constable Crescent. Overall, the design minimises the amount of street frontage lost to utilitarian entrances.</p> <p>It would have been preferable in principle if there was more active frontage, with active ground floor business “shop windows” and/or some ground floor flats or maisonettes with their own front doors. However, the two street frontages are not busy main streets, but relatively quiet hinterland, so highly active frontage is not essential. The proposed wide, almost shop like, commercial glazed frontages provide much of the appearance of shopfronts and should have much of the desired effect in providing an appearance of activity.</p> <p><u>Dwelling Mix and Block(s) Layout, including Aspect</u></p> <p>The dwelling mix is of three and four bedroom maisonettes in the western block, 2 bedroom floats in the northern and southern block and one bedroom flats in the eastern block, with 20 x 1 bedroom, 23 x 2 bedroom, 4 x 3 and 1 x 4 bedroom units. The mix is considered acceptable, and is logically laid out with the larger family sized units to the west, closest to the existing terraced housing, and the smaller units closer to the industrial areas.</p> <p>The largest number of flats served by one core is 24, which is acceptable. It should of course be noted that the entire development is gated with entry control off the street, that entrance and the lift and stairs from ground to podium being shared by all 48 flats in the development. This street entrance door, to be treated as a gate and metallic screen, will need video entry phone and /or concierge controls and care to ensure it is well maintained. But all residents have to step out into the podium to get to their front door or lift or stair to their higher level flat; this should give a sense of community within the podium.</p> <p>All the residential units are at least dual aspect, with some units in the ends of the blocks and all units by virtue of side windows onto their recessed balconies</p>	

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	<p>having three aspects. The one bedroom flats in the eastern block have both bedrooms and living rooms facing west, into the central courtyard, away from the industrial areas, but always have a hall or kitchen window facing east giving cross ventilation and light.</p> <p><u>Residential Design Standards & Internal Layout(s)</u></p> <p>All flat layouts meet Mayors Housing SPG space and layout standards. Larger flats and maisonettes are not provided with a second living room (with one exception, where one three bedroom maisonettes has a “study” which could easily be a fourth bedroom). However their open plan living/dining rooms are very spacious, daylit from both sides and have separate kitchens.</p> <p>Private amenity spaces are provided for each flat and maisonette in the form of inset, recessed, balconies or roof terraces opening off their living rooms and sized to meet or exceed London Housing SPD recommendations, in addition to everyone being able to benefit from the large communal amenity space in the podium courtyard. It is also notable that almost every flat and maisonette, including almost all the one bedroom flats, has a separate window daylighting their kitchen.</p> <p>I am therefore satisfied that the residential design standards are significantly higher than the minimum acceptable.</p> <p><u>Daylight, Sunlight and Overshadowing</u></p> <p>The applicants provided a Daylight Sunlight and Overshadowing Report, prepared in accordance with council policy following the methods explained in the Building Research Establishment’s publication “Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice” (2nd Edition, Littlefair, 2011).</p> <p>The report assesses the daylight and sunlight levels achieved in applicable habitable rooms within the proposed development and the impact of the development in existing neighbouring windows and amenity spaces. The</p>	

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	<p>report finds exceptionally good results for the proposed development, with all inhabitable rooms achieving more than the minimum recommended daylight and sunlight. This is an exceptionally good result given that the BRE Guide is only for guidance and assumes a lower density, more suburban setting. The report also assesses the internal courtyard in the proposed development, a communal amenity space for residents (although not required to meet planning guidelines) and finds 69% of it would receive at least 2hours sunlight at the spring equinox; well over the 50% recommended to make the space “feel well sunlit” as defined by the BRE Guide.</p> <p>The report further finds that the neighbouring public open space, the park beside Stamford Road immediately north of the site, 85% would continue to receive at least 2hours sunlight at the spring equinox; well over the 50% required as defined by the BRE Guide. This is pleasing given that the proposal is for a six storey block against the southern boundary of the park, which might have been expected to cause an overshadowing problem, but is testimony to both the lower rise context either side of the park to its east and west, its longer, north-south dimension admitting more sunlight, and to the broken up profile of the proposed block.</p> <p>However the report does find that some residential windows to existing neighbouring dwellings would experience a noticeable loss of daylight or sunlight within the definitions of the BRE Guide. One window of three on nos. 63 – 73 incl. Stamford Road would each loose a <i>just</i> noticeable amount of daylight from their ground floor bay window, whilst every other house between nos. 55 – 71 would lose a significant amount of winter sunlight to their 1st floor right hand window, i.e. the window to the north of their projecting bay window. The windows that would lose a noticeable amount of daylight are never the same as the windows that would lose a noticeable amount of sunlight, and those that would lose a noticeable amount of sunlight, would only lose winter sunlight hours, not year round sunlight hours.</p> <p>The loss of daylight found is never more than 3% less than the minimum 27%</p>	

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	<p>Vertical Sky Component (VSC) recommended in the BRE Guide. It should also be noted however that the recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Regarding the five windows that fail to meet the winter sunlight recommended in the BRE Guide, the applicants' consultants stress, reasonably in my view, that they are all in positions where their existing winter sunlight is <i>only just</i> acceptable, due to them being self-shaded by their own projecting bay windows immediately to their south. I would also consider that they are likely to be bedroom windows not living rooms (although this cannot be known for sure), and living rooms are considered to be the only rooms where sunlight is important. I would therefore consider this loss of winter sunlight is not likely to be at all detrimental.</p> <p>It is notable that the applicants' consultants spread their net for assessments generously wide, assessing residential properties on the north side of the park over 60m away and those on the opposite side of Stamford Road well to the north and south of the site, even assessing an industrial property on the south of Constable Crescent that appeared to be operating as a dormitory in part despite not being designed for this (industrial properties are not considered to have any day or sunlight requirements); all the wider net of properties assessed passed.</p> <p><u>Privacy & Overlooking</u></p> <p>Residents of both existing neighbouring dwellings and the housing in the proposed development have a reasonable expectation of privacy from overlooking from other nearby dwellings, amenity spaces and public realm. The greatest sensitivity is to bedrooms, but they also come with a greater expectation that residents will take their own measures (i.e. by drawing curtains) to make their bedrooms private, although proposed dwellings should avoid wherever possible any loss of privacy to any habitable room of currently secluded private amenity space in nearby existing dwellings. Experiment has</p>	

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	<p>shown that the human face cannot be recognised at distances over 18m, so a clear distance of over this becomes to all intents and purposes sufficiently private to be acceptable, particularly in a denser urban environment.</p> <p>The proposed development is directly opposite two storey terraced houses on Stamford Road. However these are facing the public street, and therefore have a reduced expectation of privacy; in particular, ground floor windows facing the street across a short or sparsely landscaped garden cannot have any expectation of privacy. The 1st floor, presumably primarily bedroom windows of the houses opposite, will have new windows directly opposite them, facing across the street at distances of about 15m. However, in the proposal, these would also be bedrooms, their living rooms are on the 2nd floor and to the other side of the block, with just kitchens and roof terraces on this side, separated by, higher cills or balustrades with window boxes, the change in level and steeper angle of view, so unlikely to be a significant over looking. So the proposed development would merely revert the street into the conventional arrangement of houses facing houses, 1st floor bedrooms facing 1st floor bedrooms, across a reasonably wide street. Any other parts of the development, such as the balconies of the upper floors of the northern block or the set-back corner of the southern block, are significantly further away from the houses on the other side of Stamford Road and so are likely to be over 18m away.</p> <p>No other housing is within anything like a close enough distance to have any question of privacy or overlooking a concern.</p> <p>As for overlooking within the development, the distance across the central courtyard east to west is just under 18m, so there will be some overlooking from the living rooms and bedrooms of the eastern block to the 2nd floor (only) living rooms of the western maisonettes, but only marginally. There are several instances where 2nd or 3rd bedrooms on the podium (1st) floor could have overlooking from neighbours on the podium, but never to main bedrooms, and in all cases there is an identified zone where residents could, if</p>	

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	<p>they wish, establish defensible space, planting or screening to discourage this. There is also a danger of angular overlooking between neighbouring blocks, particularly where the angle between them is an acute angle, less than 90°; that is between the eastern and northern block and the western and southern block, but in both cases, in one block (the northern or southern, the affected areas is deck access circulation, so less sensitive, and provided with intermittent screening to reduce the concern.</p> <p>On balance, I am therefore satisfied that the minor overlooking concerns identified are never sufficiently serious to be of concern.</p> <p><u>Elevational Treatment & Fenestration</u></p> <p>Much has been alluded to above regarding the elevational composition, for it is mentioned in the approach to form and massing that a process of progressive fracturing appears to inform their design methodology, and this continues into the elevational treatment and fenestration. As stated above, the overall block is broken into four separate above-podium blocks, with gaps between; these are then cut into with in-set balconies and on their top floor roof terraces to give a broken, “castellated” block form at the roof line and ends of blocks. This is further carried forward in subtle, repeating variations in the fenestration pattern, alternating some windows, but not all, to create a balance between order and variation.</p> <p>One guiding principle is that there are the greatest variations between the “base”, the ground floor podium, and the residential upper floors; the wide, horizontal windows and areas of rusticated brickwork mark its significant difference and establish a difference expressive of its functional difference, both in its contents and its more direct relationship to the street, but this difference is not established as a hard line between the podium and the blocks above; rather they seem to “grow” out of the base, carrying elements like window alignments and memories of the rusticated brickwork upward (the latter being used in some of the recessed balconies and roof terraces).</p>	

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	<p>A guiding principle that sharply distinguishes residential from commercial, base from upper, appears to be opening proportioning, with upper floor residential windows and cut-outs being of a strongly vertical proportion. Even openings to access decks, on the internal courtyard facing elevations of the north and south block and external west facing elevation of the eastern block, are broken into smaller openings of more vertical proportions, with an alternating floor pattern of variation. This gives the proposed design distinguished, urban, residential proportions, that jog memories of some of the better existing buildings in the vicinity, including the older late 19th century housing opposite and of much housing across London.</p> <p>The most significant variation in form, elevational treatment and fenestration is to the two stair towers, providing access to all the flats above podium level; these are located in the gaps between the northern and eastern block and between the eastern and southern block and are treated as semi-transparent objects, as a part of the space, open to the elements on all sides but enclosed in closely spaced vertical fins, providing just a hint of transparency and just glimpses in and out. They are also designed as unvarying objects, with no fenestration pattern, as continuous screens, contrasting with the brick mass.</p> <p>I am confident that the proposal, if built as currently designed, would be an attractive, confident and elegant addition to the locality.</p> <p><u>Materials & Details</u></p> <p>The materials palette is predominantly brick, which is appropriate as a durable, robust material that weathers well, as well as being established by precedent from local context. A limited palette of just one bricks is proposed, with variation mostly achieved through the form, massing and fenestration, but with one significant variation in the way the brick is used. This is to introduce variation, texture and roughness in parts of the ground floor and within inset balconies and roof terraces using “burnt end snap headers”; this sounds to me to be an intelligent, imaginative way to achieve variation with continuity, a way</p>	

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	<p>to add texture and signify difference without too much added complexity, expense and waste.</p> <p>The specific brick proposed is to be agreed at condition, but it is agreed at this stage that it is to be a red brick, with some natural tonal variation. Detailing is simple and minimalist, including simple flush brick on edge to parapets and no distinction of lintels. This is appropriate to the architectural style but care over specification, detailing and workmanship will be required to ensure quality and durability, which should be secured by condition. I have not seen any detail of the proposed material to the underside of soffits.</p> <p>The most significant variation in materials is to the two stair towers; these are to be screened in closely spaced vertical metal fins, proposed to be in steel. This would have echoes in the vertical steel balustrades proposed to the inset balconies and access terraces. On both cases the depth of the fins would provide privacy to them, preventing views in unless standing “square-on”. Window frames, external doors and solid spandrel panels within window openings are proposed to be in aluminium, coloured dark grey, to be detailed by condition.</p> <p><u>Conclusions</u> As design officer I am satisfied that the proposal is of the highest quality design, and is appropriate for its location and proposed functions. There are a few details as well as the usual materials that I would seek to have secured buy condition, as noted above. But otherwise I have no concerns regarding its impact on neighbours, whether from daylight, sunlight or privacy, and am confident it would provide high quality, durable, robust and attractive living and working accommodation and fit confidently and comfortably into the changing streets around its location.</p>	
Transportation	The development site is located between Tottenham Hale and Seven Sisters, the site has road frontages on Stamford Road and Constable Crescent, the site is accessed via Constable Crescent, Markfield Road to Broad Lane and	Observations have been taken into account. The recommended legal

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	<p>via Stamford Road to Broad Lane.</p> <p>The site currently has vehicular crossover on Constable Crescent, there is a redundant vehicular access on Stamford Road and an active vehicular access on Stamford Road close to the entrance with the park. The site is located in an area with a high public transport accessibility level, PTAL 6a (0 being the worst and 6b being the best). The site has good accessibility to public transport with 10 bus routes (349, 259, 279, 243, 318, 476, 149, 76, 41, and W4) operating in close proximity to the site. The frequencies of buses on the routes serving the site range from 4 to 12 vehicles per hour, with an average frequency of 87 vehicles per hour. Seven Sisters Rail and LUL Stations are approximately 631m from the site, 8 minutes walk time. South Tottenham Rail Station is approx. 873m from the site and can be reached by walking within 11 minutes.</p> <p><u>Description of Development</u></p> <p>The applicant is proposing to demolish the existing office and builders yard and redevelopment the site to provide:</p> <ol style="list-style-type: none"> 1) 42 residential units including (20 one bed, 23 two-bed 4 three bed and 1 four bed duplex dwelling 2) 570 square metres of replacement office space for Diamond Build 3) 570 square metres of new affordable office space. 4) 17 parking space, including 6 disabled car parking and 5) 92 cycle parking space with 80 cycle parking spaces for the residential aspect of the development and 12 cycle parking spaces for office element. <p><u>Trip Generation</u></p> <p>The applicant has conducted surveys (multi-modal surveys) of office element and service yard of the existing development 3 days survey was conducted in November 2016, the results of the survey concluded that the existing office</p>	<p>agreement clauses, conditions and informatives will be included with any grant of planning permission.</p>

Stakeholder	Question/Comment	Response
	<p>element of the development generated and average of 194 trips over a 12 hour period 07:00-19:00 hours, with a total of 14 in/out trips during the Am peak hour and 19 in/out trips during the PM peak period.</p> <p>The Service Yard element of the proposal which is located on Constable Crescent generated a total of 105 trips over the 12 hour period with 13 in/out trips during the AM peak hour and no trips during the PM peak period. The cumulative trips generated by the development is some 299 trips over a 12 hour, with 27 in/out trips during the Am peak hour and 19 in/out trips during the PM peak hour.</p> <p>The applicant transport consultant (SYSTRA) has produced trip generation forecast based on the following sites from the TRICS database (residential): Oval Road Regents Park, Lamb Walk Bermondsey. Using the above sites the applicant's transport consultant has forecasted that the proposed 48 units will generate a total 269 person trips between 7am and 7pm. Using the journey to work information from the 2011 census data the majority of the residential trips will be by sustainable modes of transport with only 14% of the trips generated by the site by car drivers and car passengers with 86% of the trip by sustainable modes of transport. The applicant is proposing to make the majority of the development a car free development; however based on the 2011 Census data the development will generate some 5 in/out car drive trips in the AM peak hour and 1 in/out car drive trip during the PM peak hour.</p> <p>The office element of the site is divided into two sections, the retained element of the Diamond Build office some 570 SQM and the new affordable rent offices of some 570 SQM. The retained Diamond Build offices have been surveyed and the results of the survey has confirmed that the development would generate 194 two-way persons trip between 7am and 7pm with 14 two-way vehicular trips during the AM peak period and 19 two-way peak trips during the PM peak periods. The applicant has used the TRICS trip forecast database to produce the trips that are likely to be generated by the new office space of</p>	

Stakeholder	Question/Comment	Response
	<p>some 570 SQM. We have considered that the Transport Statement should have used the trips surveyed from the Diamond Build offices to forecast the trips that are likely to be generated by the new office space. The sites selected underestimate the trips that will be generated by the new office building. We have concluded that the trips generated by the new office use would be similar to the trips generated by the existing office use. However as the majority of the trips to the new office building will be by sustainable modes of transport (86% by mode) we will assess the likely impacts of the additional trips by sustainable modes of transport and the various modes.</p> <p>The trip generation analysis presented in the Transport Assessment suggests that the proposed development will generate a total of 548 person trips between 07:00-19:00 with a total of 57 in/out trips during the AM peak hour (12 in/out vehicular trips) and 35 in/out trips during the PM peak hour (11 in/out vehicular trips). We have considered that give the redevelopment of the site will not result in any significant increase vehicular trips on the transportation and highways network, there is no need for the applicant to complete highways junction modeling.</p> <p>The trip generation analysis shows that the proposal will create an increase in trips by public transport (Bus, Rail and Underground). The net trip generation for public transport forecasted some 418 two-way trips over a 12 hour period (07:00 to 19:00). This translates into 41 two-way public transport trips in the AM peak and 24 two-way public transport trips in the PM peak.</p> <p>The breakdown per public transport mode is: 14 two/way bus trips in the AM peak period and, 8 two way trip during the PM peak period, 18 two way underground trips in the AM peak period and 8 two way underground trips during the Pm peak periods. The rail trips are 7 two way trips in the AM peak hour and 4 two way rail trips during the PM peak periods. A small net increase in cycle movement is predicted 2 two-way cycle trips during the AM and PM peak traffic periods respectively. Such a small increase would have little</p>	

Stakeholder	Question/Comment	Response
	<p>impact on the adjoining road network. Given the relatively small increase public transport trips generated by the site the underestimation of the new office trips would not have any significant impact on the various modes of public transport.</p> <p>We have reviewed the total trip generation and distribution over the various modes and have concluded that the impacts of the trips generated by the proposed development would not significantly impact on the operation of the various modes.</p> <p><u>Parking Provision</u></p> <p>The applicant has conducted a parking survey in the area surrounding the site (200 metres) which included the following Roads: Ashby Road, Constable Crescent, Harold Road, Markfield Road, Newton Road, Page Green Road, Stamford Close, Stamford Road, Victoria Road and Walton Road; the parking surveys were conducted in line with the Lambeth methodology on; Wednesday 2nd November and Thursday 3rd November 2016; the parking surveys conducted overnight when the majority of residents were at home and the demand for on street car parking spaces will be at the highest, the length of car parking spaces was assumed to be 6 metres which is a worst case scenario. On reviewing the results of the car parking survey there is spare capacity available on the local network with between 85-87 residential car parking spaces available. All the roads within the study area have spare capacity with the exception of Constable Crescent which is suffering from high car parking pressure. It is to be noted that several of the roads (Markfield Road and Fountayne Road) to the east of the site is currently not covered by a control parking zone and as such, these roads may suffer from residual car parking demand generated by the development; we will therefore require the applicant to contribute a sum of £18,000 (eighteen thousand pounds) towards the design and consultation of parking control measures on these road as well amend the existing traffic management orders,</p>	

Stakeholder	Question/Comment	Response
	<p>The Councils Saved UDP Policy M9 “Car-free Developments” state that: Proposal for new development without the provision of car parking spaces will be permitted in locations where:</p> <ul style="list-style-type: none"> a) There are alternative and accessible means of transport available; b) Public transport is good; and c) A controlled parking zone exists or will be provided prior to occupation of the development <p>In addition the Council’s Local Plan SP7: Transport, which focuses on promoting sustainable travel and seeks to adopt maximum car parking standards and car free developments. Car free developments are further supported by Haringey Development Management DPD, Policy DM32 which support car-free development in areas with a good public transport accessibility level provided a CPZ exist.</p> <p>The applicant is proposing to provide a total of 17 car parking spaces including 6 wheel chair accessible car parking space. Of the proposed car parking spaces 10 car parking spaces will be allocated to the residential aspect of the development including 5 wheel chair accessible car parking spaces 10% of the total number of units proposed in line with the London Plan and life time homes. The remaining 7 car parking space will be allocated to the commercial element of the proposal including 1 wheel chair accessible car parking space. The residential car parking and commercial car parking are in line with the London Plan and the Council’s Saved UDP Policy M10. The applicant will be required to ensure that 20% of all the proposed residential car parking space have active electric charging points with a further 20% of the spaces having passive provision for future conversion, in addition the car parking space for the B1 element of the proposal must provide 10% active electric charging provision with a further 10% passive electric charging provision for future conversion. The applicant will be required to provide a parking management plan which demonstrates how the car parking to the residential and commercial</p>	

Stakeholder	Question/Comment	Response
	<p>aspect of the development will be allocated, the plan must also include details on how the allocated car parking spaces will be enforced to ensure that allocated residents car parking spaces are not used by occupiers of the B1 offices.</p> <p>The applicant has provided cycle parking in line with the 2015 London Plan which requires a minimum of 76 long stay secure sheltered cycle parking spaces for residents and 2 visitors' cycle parking spaces for visitors of the residential aspect of the development. Based on the total office floor spaces of 1,140 SQM the applicant is required to provide 8 long stay cycle parking spaces for the B1 element of the development. The applicant has provided locations of the cycle shelter for the commercial and residential aspect of the development however details have not been provided on the type of cycle parking including dimensions and method of security, 5% of the proposed residential cycle parking must be able to accommodate large cycle such as tandems and bikes with trailer, the design and layout of the cycle parking must be provided in line with the London Cycle Design Standard. We will require a condition to securing the type layout and method of access/security for the proposed cycle parking.</p> <p>As the development proposal is car capped the applicant will be required to provide car club membership to each of the residential units, prior to occupation of the development the applicant will be required to implement a car club scheme and offer 2 years free membership and £50 (fifty pounds) in driving credit to each residential unit. The approach to parking under the proposal is consistent with London Plan 6.13 and saved UDP policy M9 i.e. encouraging minimum car parking provision in areas of excellent transport accessibility, in order to promote the use of non-car modes of travel.</p> <p><u>Accident Analysis</u></p> <p>The applicant has reviewed the last 5 years accident to the end of April 2016</p>	

Stakeholder	Question/Comment	Response
	<p>the area surrounding the site which include Broad Lane to Tottenham Hale Station, Broad Lane to Seven Sisters Station including the Junction of Seven Sister Road/ High Road N15 and West Green Road junction with High Road N15 and Broad Lane, the area reviewed also include Stamford Road, Markfield Road, Constable Crescent, and Rangemore Road. Within the immediate area surrounding the site Stamford Road, Constable Crescent and Markfield Road and the junction of Stamford Road with Broad Lane; there were a number of accidents, however it is to noted that due to the recent changes to the operation of Broad Lane from one-way to two-way operation the accident analysis does not represent the current highways layout as such, it is not possible to draw any conclusion from the current accident data. In addition give the relatively low levels of vehicular trips generated by the development, the development is not likely to worsen the existing accident problem.</p> <p><u>Access and Servicing Arrangements</u></p> <p>The applicant is proposing to remove the existing 4 dropped kerbs/ crossover and reconstruct the footways way and provide on shared vehicular access for the commercial and residential access on Constable Crescent, the applicant is also proposing to construct inset car parking bays on Stamford Road with new trees and a raised planter on the junction of Constable Crescent with Stamford Road as per Drawing No:197-PIN-200 REV-E. The amendments have been reviewed by the Council's Highways Infrastructure Team and the cost of the works have been estimated at £51,186 (fifty one thousand one hundred and eight six pounds) the applicant will be required to enter into S.278 agreement for the implementation of the works.</p> <p>Access to the residential and commercial bin storage is from Stamford Road, the applicant is proposing to construct a new shared use bay on Stamford Road to enable refuse trucks to service the development, the carrying distance for the proposed Euro Bins are in excess.</p>	

Stakeholder	Question/Comment	Response
Financial Viability	<p>The Applicant has reported a Residual Land Value of £0. The Applicant did not undertake an Argus appraisal, they modelled their proposed scheme on their own Excel modelling with a view that as owner/developer certain items are negated. We have therefore modelled our own Argus appraisal. We have carried out a thorough review of the scheme and reach a Residual Land Value of £149,632 based on the assumptions detailed within this report. As outlined in Section 6 of this report we have adopted a Site Value Benchmark of £2.15m. On this basis we consider there is a deficit of £2m. We conclude the site cannot viably provide affordable housing either on site or as a contribution off site.</p> <p>We note the Applicant has taken the Stamp Duty out of their appraisal. We would not undertake an appraisal on this basis, however, if the Stamp Duty was removed from our appraisal the scheme could still not viably provide any affordable housing.</p>	Comments noted.
Regeneration	<p>The application site is located within a Locally Significant Industrial Site, the South Tottenham Employment area and is within the Tottenham Regeneration Area. The site is currently under-utilised and has the potential to accommodate a greater amount of commercial floor-space.</p> <p>By providing an employment-led scheme that achieves a transitional character between established industrial and residential uses, the proposed development is aligned with the ambition set out by the Tottenham Strategic Regeneration Framework (SRF) and the Tottenham Area Action Plan.</p> <ul style="list-style-type: none"> • Employment Floorspace <p>The site is within a Designated Employment Area, where proposals for development are required to maximise the quantum of dedicated employment floorspace. Residential uses will only be permitted in order to optimise the</p>	Comments noted.

Stakeholder	Question/Comment	Response
	<p>delivery of new employment space.</p> <p>The development will provide 1140 sqm of workspace, securing an additional 398 sqm of workspace that currently exists. The additional workspace will be discounted by 50% of market value and leased to small and medium sized enterprises. The applicant has proposed a focus on construction industries within the affordable workspace- This sector focus is well aligned with the industrial character of the area. There is significant demand for Class B floorspace within the borough, which the development site will accommodate. The employment floorspace should provide workshop and studio spaces to cater for light-industrial and small- scale production uses, consistent with the surrounding industrial uses.</p> <p>The Tottenham Regeneration team have requested more information on the proposed 'open workspace model' and how the commercial floorspace will be effectively managed. The proposed model should ensure a high concentration of quality and diverse employment opportunities, as well as encourage business growth.</p> <ul style="list-style-type: none"> • Design <p>The surrounding area comprises a mix of uses. The site marks the western edge of the industrial uses that exist along Constable Crescent, separating it from residential properties located along Stamford Road. The proposed mixed use development achieves LBH's ambitions to secure a transitional character between established industrial and residential uses.</p> <p>The proposed design will add to the streetscape by providing an active frontage along Stamford road, as well as providing natural surveillance to the currently neglected green space adjacent to the site. The development consists of four distinct blocks which vary in height and layout, responding to their immediate context.</p>	

Stakeholder	Question/Comment	Response
	<p>The applicant must demonstrate that the relationship between the workspace and the residential element of the development will be effectively managed, and provide demonstrable improvements in the site's suitability for employment activities.</p> <ul style="list-style-type: none"> • Improvements to Green Space <p>The applicant's developer contributions will be used to deliver improvements to the green space on Stamford Road, adjacent to the development site. The green space is currently under-used and poorly designed- encouraging anti-social behaviour and discouraging community stewardship. The park is under the ownership of Homes for Haringey, who have began exploring interventions to improve the space, including the establishment of a community steering group. The applicant has been engaged in these activities, and intends to continue to play an active role in the improvement project going forward.</p>	
Arboricultural Officer	<p>I have no objection to this proposed development. There are no trees on the development site, but there will be some impacts on trees in the adjacent open space, which is owned by Homes for Haringey. I have been informed that there will be a S106 agreement for improvements to the open space, discussions are ongoing to agree a programme of improvements which may involve the loss of some existing trees and the planting on new ones.</p>	Comments noted.
Waste Management	<p>Adequate waste storage facilities should be in place to service the proposed residential units so as to avoid side waste and dumped bulky goods.</p> <p>Commercial waste should be presented separate from residential waste.</p> <p>Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council</p>	Comments noted.

Stakeholder	Question/Comment	Response
	<p>Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</p> <p>Waste must be properly contained to avoid spillage, side waste and wind blown litter. Waste collection arrangements must be frequent enough to avoid spillage and waste accumulations around the bin area and surrounding land both private and public.</p> <p>Amber</p>	
Drainage Officer	<p>We are happy with the concept and outline including calculations for volume and flow presented during the meeting on Monday. From a drainage perspective the presentation was very positive and constructive.</p> <p>We now need to request detailed drainage drawings for final comment, alteration if necessary and sign off. I believe the site owner was to commission a consultant to produce these.</p>	Comments noted.
Homes for Haringey	<p>What we would want at every stage is for the local resident to be involved with the design, be consulted and have an input in the final lay out. In the plans there are mentions of a natural play area, can you involve Earlsmead Primary School on Newton road with this.</p> <p>With the landscaping, Parks Services must be involved regarding ongoing maintenance concerns.</p>	Comments noted.
Carbon Management	<p>Energy – Overall</p> <p>The scheme delivers an overall 36.6% improvement beyond Building Regulations 2013. The policy requirement for residential is zero carbon and 35% improvement beyond Building Regulations 2013 for commercial. The applicant has offered an offsetting contribution of £113,230.</p> <ul style="list-style-type: none"> The domestic on-site saving is 35.8% 	Observations have been taken into account. The recommended conditions will be included with any grant of planning permission and some aspects will be

Stakeholder	Question/Comment	Response																								
	<ul style="list-style-type: none"> The commercial on-site saving is 42% <p>Energy – Lean</p> <p>The applicant has proposed an improvement of beyond Building Regulations by 3.3% through improved energy efficiency standards in key elements of the build. While this is not best practice it is policy compliant and a positive.</p> <p>This should be conditioned to be delivered on site:</p> <p>Suggested Condition:</p> <p>You must deliver the energy efficiency standards (Be Lean) as set out in the approved Energy Strategy, by CallaghanGreen, dated January 2017, with an Addendum submitted by CallaghanGreen, dated March 2017.</p> <table border="1" data-bbox="611 794 1472 1357"> <thead> <tr> <th data-bbox="611 794 850 979">Building Element</th> <th data-bbox="850 794 1188 979">Proposed specification for the residential development (u-values)</th> <th data-bbox="1188 794 1472 979">Proposed specification for the commercial development</th> </tr> </thead> <tbody> <tr> <td data-bbox="611 979 850 1016">Walls</td> <td data-bbox="850 979 1188 1016">0.16</td> <td data-bbox="1188 979 1472 1016">0.18</td> </tr> <tr> <td data-bbox="611 1016 850 1053">Floor</td> <td data-bbox="850 1016 1188 1053">0.12</td> <td data-bbox="1188 1016 1472 1053">0.15</td> </tr> <tr> <td data-bbox="611 1053 850 1091">Roof</td> <td data-bbox="850 1053 1188 1091">0.12</td> <td data-bbox="1188 1053 1472 1091">0.10</td> </tr> <tr> <td data-bbox="611 1091 850 1128">Door</td> <td data-bbox="850 1091 1188 1128">1.35</td> <td data-bbox="1188 1091 1472 1128">1.54</td> </tr> <tr> <td data-bbox="611 1128 850 1166">Windows</td> <td data-bbox="850 1128 1188 1166">1.35</td> <td data-bbox="1188 1128 1472 1166">1.2</td> </tr> <tr> <td data-bbox="611 1166 850 1317">G-value</td> <td data-bbox="850 1166 1188 1317">Mixture of 0.4 for north facing windows and 0.2 for South, East & West facing</td> <td data-bbox="1188 1166 1472 1317">0.39</td> </tr> <tr> <td data-bbox="611 1317 850 1357">Air tightness</td> <td data-bbox="850 1317 1188 1357">4 m³/hr/m²</td> <td data-bbox="1188 1317 1472 1357">4 m³/hr/m²</td> </tr> </tbody> </table>	Building Element	Proposed specification for the residential development (u-values)	Proposed specification for the commercial development	Walls	0.16	0.18	Floor	0.12	0.15	Roof	0.12	0.10	Door	1.35	1.54	Windows	1.35	1.2	G-value	Mixture of 0.4 for north facing windows and 0.2 for South, East & West facing	0.39	Air tightness	4 m ³ /hr/m ²	4 m ³ /hr/m ²	<p>incorporated in the proposed legal agreement.</p>
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Stakeholder	Question/Comment	Response
	<p>The development shall then be constructed in strict accordance of the details so approved, and shall achieve the agreed carbon reduction of 2.9%% beyond BR 2013 with a carbon saving of 2.7 tonnes – set out in the approved Energy Strategy. Confirmation that these energy efficiency standards and carbon reduction targets have been achieved must be submitted to the local authority at least 6 months of completion on site for approval. This report will show emissions figures at design stage to demonstrate building regulations compliance, and then report against the constructed building. The applicant must allow for site access if required to verify measures have been installed.</p> <p>The Council should be notified if the applicant alters any of the measures and standards set out in the submitted strategy (as referenced above). Any alterations should be presented with justification and new standards for approval by the Council.</p> <p>Should the agreed target not be able to be achieved on site through energy measures as set out in the afore mentioned strategy, then any shortfall should be offset at the cost of £2,700 per tonne of carbon plus a 10% management fee.</p> <p>Reason: To comply with London Plan Policy 5.2. and local plan policy SP:4</p> <p>Energy – Clean</p> <p>A central ASHP heating and hot water solution is proposed to serve the development - hot water will be generated centrally via the ASHP and distributed to serve each dwelling’s heating and hot water requirement. The dwelling heating solution is under floor heating.</p> <p>The developer will leave space for a heat exchanger within the plant space and blank connections from the main heating header pipe work to enable ease of installation of a step-down heat exchange to connect to the district heating network. In addition, incoming ducts can be installed to allow new district</p>	

Stakeholder	Question/Comment	Response
	<p>heating pipe work installation to be installed with minimum disruption.</p> <p>Suggested Condition:</p> <p>Design details of the ASHP facility and associated infrastructure, which will serve heat and hot water loads for all the units on the site shall be submitted to and approved in writing by the Local Planning Authority 3 months prior to any works commencing on site. The details shall include:</p> <ul style="list-style-type: none"> a) location of the energy centre; b) specification of equipment; c) flue arrangement; d) operation/management strategy; and e) the method of how the facility and infrastructure shall be designed to allow for the future connection to any neighbouring heating network (including the proposed connectivity location, punch points through structure and route of the link) <p>Once these details are approved the Council should be notified if the applicant alters any of the measures and standards set out in the submitted strategy (as referenced above). Any alterations should be presented with justification and new standards for approval by the Council.</p> <p>The ASHP facility and infrastructure shall be carried out strictly in accordance with the details so approved, installed and operational prior to the first occupation of the development and shall be maintained as such thereafter.</p> <p>REASON: To ensure the facility and associated infrastructure are provided and so that it is designed in a manner which allows for the future connection to a district system in line with London Plan policy 5.7 and local plan SP:4 and DM 22.</p>	

Stakeholder	Question/Comment	Response
	<p>Energy – Green</p> <p>That application has reviewed the installation of various renewable technologies. They have concluded that the most appropriate technology is solar PV panels, ASHP and drain water heat recovery.</p> <p>This is supported and should be conditioned:</p> <p>Suggested condition</p> <p>You will install the renewable energy technology (PV Solar Panels, ASHP and drain water heat recovery) as set out in the approved Energy Strategy, by CallaghanGreen, dated January 2017, with an Addendum submitted by CallaghanGreen, dated March 2017.</p> <p>The applicant is installing 286m² of PV panels with a rated output 43kWp which will reduce the development’s regulated CO₂ emissions by 18%. In addition the applicant is installing ASHP for heating and hot water will reduce the development’s regulated CO₂ emissions by 11%, and drain water heat recovery will reduce the development’s regulated CO₂ emissions by 5%.</p> <p>Should the agreed target not be able to be achieved on site through energy measures as set out in the afore mentioned strategy, then any shortfall should be offset at the cost of £2,700 per tonne of carbon plus a 10% management fee.</p> <p>Reason: To comply with London Plan Policy 5.7. and local plan policy SP:4</p> <p>Sustainability Assessment</p> <p>The applicant has not submitted a Sustainability Assessment within their Energy Strategy.</p> <p>Suggested condition:</p>	

Stakeholder	Question/Comment	Response
	<p>You must deliver the sustainability measures as set out in approved Sustainable Design and Construction, by CallaghanGreen, dated January 2017.</p> <p>The development shall then be constructed in strict accordance of the details so approved, and shall achieve the agreed rating of BREEAM 'Very Good' for the commercial space (indicative total score 65.5%) and HQM 3 stars for domestic space (indicative total score 316) and shall be maintained as such thereafter. A post construction certificate or evidence shall then be issued by an independent certification body, confirming this standard has been achieved. This must be submitted to the local authority at least 6 months of completion on site for approval.</p> <p>In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the local authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</p> <p>Reasons: In the interest of addressing climate change and to secure sustainable development in accordance with London Plan (2011) policies 5.1, 5.2, 5.3 and 5.9 and policy SP:4 of the Local Plan.</p> <p>Overheating Risk</p> <p>The developments overheating risk has been assessed through the applicants Energy Strategy, by CallaghanGreen, dated January 2017. The dynamic thermal model (under London's future temperature projections, CIBSE TM49 Weather Files) submitted shows that there are no domestic units at risk from overheating, but there is a requirement for comfort cooling in the commercial space. The cooling demand to these spaces has been reduced by</p>	

Stakeholder	Question/Comment	Response
	<p>27% compared to the notional building by efficient passive design, minimising the number of hours this active cooling will run.</p> <p>To reduce the heat entering the building shade will be provided by balconies, solar control glass to the main commercial areas and light coloured blinds to the domestic areas. The g-value of the glass in both areas will balance overheating with the desire to maximise beneficial solar gains in the winter. High levels of thermal insulation were used to control heat entry to the building on the hottest of days. The applicant has proposed a mixture of g-values for domestic areas of 0.4 for north facing windows and 0.2 for South, East & West facing, and 0.39 for commercial areas.</p> <p>Suggested Condition:</p> <p>You must deliver building shading - provided by balconies, solar control glass to the main commercial areas and light coloured blinds to the domestic areas - in accordance with the approved Energy Strategy, by CallaghanGreen, dated January 2017.</p> <p>The development shall be carried out strictly in accordance with the details so approved, shall be maintained as such thereafter and no change there from shall take place without the prior written consent of the Local Planning Authority.</p> <p>REASON: London Plan Policy 5.9 and local policy SP:04 and in the interest of adapting to climate change and to secure sustainable development.</p>	
<p>Pollution (Air Quality & Contaminated Land)</p>	<p><u>Air Quality:</u></p> <p>The London Plan, Policy 7.14 states that new development should:</p> <ul style="list-style-type: none"> • minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be 	<p>Comments have been taken into account and conditions will be requested.</p>

Stakeholder	Question/Comment	Response
	<p>used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans</p> <ul style="list-style-type: none"> • promote sustainable design and construction to reduce emissions from the demolition and construction of buildings; • be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)). • Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site. <p>Photo voltaic panels are proposed with this planning application. CHP is considered unsuitable for this development proposal and as such has been screened out in the Energy Assessment. A condition with respect to emissions from CHP is not required. The energy statement refers to the use of Air Source Heat Pumps to provide under floor heating, and electric water heaters and a centralised energy efficient gas boiler for domestic hot water.</p> <p>17 car park spaces are planned with 20% of these spaces being provided with active electric vehicle charging points and 20% with passive points. A draft residential travel plan and draft Office travel plan have also been submitted.</p> <p>However the air quality neutral assessment has determined that the proposed development is not air quality neutral and therefore mitigation measures will be required.</p> <p>Therefore it is essential that mitigation measures are developed as part of the development to minimise emissions of NO2 and PM10. These measures must include:</p> <ul style="list-style-type: none"> • A low emission car club space; 	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • 100% electric vehicle charging points (50% active/50%passive); • a Delivery and Servicing plan to reduce the number of overall trips and increase the number of trips made by electric or ultra low emissions; • selection of boilers with as low NOx emissions as possible to minimise emissions from combustion plant. <p>In addition measures should comply as a minimum with the following guidance: The Mayor’s Sustainable design and construction SPG, TFL’s Guidance on Delivery and Servicing Plans, and The Control of Dust and Emissions during Construction and Demolition SPG.</p> <p>I recommend the following conditions:</p> <p><u>Contaminated land: (CON1 & CON2)</u></p> <p><u>CON1:</u></p> <ul style="list-style-type: none"> • Before development commences other than for investigative work: <ul style="list-style-type: none"> a) Using the information contained within the Phase I desktop study and Conceptual Model, a site investigation shall be carried out for the site. The investigation must be comprehensive enough to enable:- <ul style="list-style-type: none"> ▪ a risk assessment to be undertaken, ▪ refinement of the Conceptual Model, and ▪ the development of a Method Statement detailing the remediation requirements. <p>The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the</p>	

Stakeholder	Question/Comment	Response
	<p style="text-align: center;">Local Planning Authority.</p> <p>b) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.</p> <p><u>And CON2 :</u></p> <ul style="list-style-type: none"> • Where remediation of contamination on the site is required completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. <p style="text-align: center;"><i><u>Reason:</u> To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</i></p> <p><u>Combustion and Energy Plant:</u></p> <p>Prior to installation, details of the Ultra Low NOx boilers for space heating or domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided shall have dry NOx emissions not exceeding 20 mg/kWh (at 0%O2).</p> <p><i>Reason: To protect local air quality and offset transport emissions</i></p>	

Stakeholder	Question/Comment	Response
	<p><u>Management and Control of Dust and Emissions:</u></p> <ul style="list-style-type: none"> • 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 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. <p><i><u>Reason:</u> To Comply with Policy 7.14 of the London Plan</i></p> <ul style="list-style-type: none"> • Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA. <p><i><u>Reason:</u> To Comply with Policy 7.14 of the London Plan</i></p> <ul style="list-style-type: none"> • No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases is compliant with Stage IIIA of EU Directive 97/68/ EC for both NOx and PM and all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site. <p><i><u>Reason:</u> To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</i></p> <ul style="list-style-type: none"> • An inventory of all NRMM must be kept on site during the course of 	

Stakeholder	Question/Comment	Response
	<p>the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p><i>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</i></p> <p><u>As an informative:</u></p> <p>Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
<p>Noise</p>	<p>I have had a look at the noise report.</p> <p>In 2.5.1 Proposed Plant Noise Emission Criteria they identify proposed cumulative plant noise emissions to be designed to a level that is equal to a level 5dB below the typical background sound level during the daytime and equal to the typical background sound level during the night-time. In both cases the above limits would apply at 1 m from the nearest neighbouring residential window. This may be acceptable but they should aim to design for 10dB below background where possible.</p> <p>I do consider that a condition should be placed to require a report stating how they will achieve internal noise levels in accordance with BS 8233 Desirable</p>	<p>Comments noted.</p>

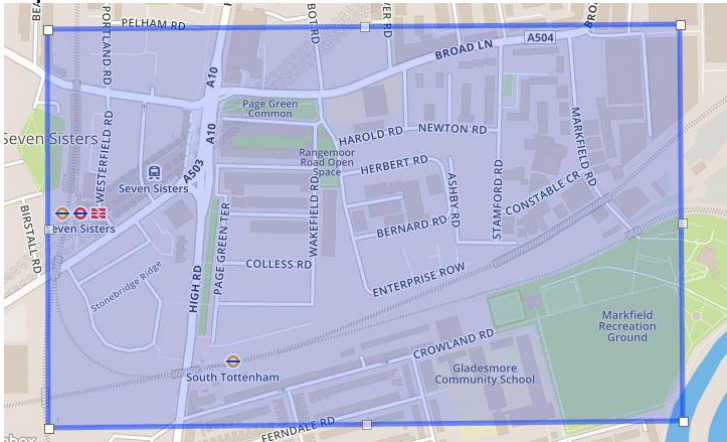
Stakeholder	Question/Comment	Response
	<p>Internal Ambient Noise Levels for Dwellings Table 2.1</p> <p>This may require specific types of glazing and action to enable passive or mechanical ventilation rather than having to open windows for ventilation.</p> <p><u>Possible condition</u></p> <p>In order to secure a comfortable internal environment, additional means of ventilation may be necessary, in accordance with BS8233 and Building Regulations. Details of the proposed ventilation / attenuation shall be submitted and approved in writing by the local planning authority.</p> <p>Reason: In order to secure a comfortable internal environment for the occupants of the residential properties.</p>	
Emergency Planning	<p>No additional comments from me, though I note the comments from London Fire Brigade and Building Control and would wish to see these satisfactorily addressed by the developer.</p>	Noted.
Building Control	<p>This department has no objection to this application. It is noted from the deposited drawings that with regard to Access for the Fire Brigade, more details may be required. This type of work will require a Building Regulation application to be made after Planning permission has been granted. We have been working to expand and improve the services and products we can offer our customers such as warranties, fire engineering, fire risk assessments, structural engineering, party wall surveying, SAP, EPC, SBEM calculations, BREEAM, CfSH calculations, acoustic advice, air pressure testing etc in consultation with the LABC (Local Authority Building Control) and I would be pleased to explain any of the services in more detail if required.</p> <p>Contacts us with any queries you may have at: building.control@haringey.gov.uk</p>	Comments are noted.

Stakeholder	Question/Comment	Response
EXTERNAL		
Environment Agency	<p>Thank you for consulting us with this planning application. Having reviewed the information submitted we have no objections to the proposed scheme. We have provided have provided the following advice regarding ground conditions and flood risk.</p> <p>Ground Conditions</p> <p>We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals.</p> <p>We recommend however that the requirements of the National Planning Policy Framework and National Planning Policy Guidance (NPPG) are still followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be additional to the risk to human health that your Environmental Health Department will be looking at.</p> <p>We expect reports and Risk Assessments to be prepared in line with our 'Groundwater protection: Principles and practice' document (commonly referred to as GP3) and CLR11 (Model Procedures for the Management of Land Contamination).</p> <p>In order to protect groundwater quality from further deterioration: - No infiltration based sustainable drainage systems should be constructed on land affected by contamination as contaminants can remobilise and cause groundwater pollution.</p>	Comments are noted.

Stakeholder	Question/Comment	Response
	<p>- Piling or any other foundation designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution.</p> <p>The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:</p> <ul style="list-style-type: none"> - From www.gov.uk: <ul style="list-style-type: none"> <input type="checkbox"/> Groundwater Protection: Principles and Practice (August 2013) <input type="checkbox"/> Our Technical Guidance Pages, which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency’s Guiding Principles for Land Contamination) in the ‘overarching documents’ section <input type="checkbox"/> Use MCERTS accredited methods for testing contaminated soils at the site - From the National Planning Practice Guidance: <ul style="list-style-type: none"> <input type="checkbox"/> Land affected by contamination - British Standards when investigating potentially contaminated sites and groundwater: <ul style="list-style-type: none"> <input type="checkbox"/> BS 5930: 1999 A2:2010 Code of practice for site investigations <input type="checkbox"/> BS 10175:2011 Code of practice for investigation of potentially contaminated sites <input type="checkbox"/> BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points <input type="checkbox"/> BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters <p>All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person.</p>	

Stakeholder	Question/Comment	Response
	<p>The competent person would normally be expected to be a chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.</p> <p>Flood Risk</p> <p>The proposed development falls within Flood Zone 2 as defined by Table 1 of the NPPG. This proposal must conform to our Flood Risk Standing Advice (SFRA).</p>	
<p>Thames Water</p>	<p><u>Waste Comments</u></p> <p>Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application. There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit thameswater.co.uk/buildover</p> <p>Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site</p>	<p>Observations have been taken into account and recommended conditions/informatives will be included with any grant of planning permission.</p>

Stakeholder	Question/Comment	Response
	<p>drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921.</p> <p>Reason: to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.</p> <p><u>Water Comments</u></p> <p>Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.</p> <p>Reason: The proposed works will be in close proximity to underground water utility infrastructure.</p> <p>Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.</p>	

Stakeholder	Question/Comment	Response
<p>Metropolitan Police</p>	<p>Whilst the Metropolitan Police have no formal objection to this application, the risk of crime within both the public and non-public areas of the proposed development, as well as the interaction between the two, should be considered and preventative measures made.</p> <p>I have reviewed the crime rate in the local area of the proposed development on Police.uk as per the illustration below:</p>  <p>The crime map has highlighted that the following crimes were reported in the area and that Haringey as a whole has a higher than average crime rate in comparison to similar areas.</p> <p>To date we have not had any contact with the architects or developers for this proposal. However I note from the Design and Access Statement (Section 8) they have taken Secured by Design into consideration during the design and are planning to submit a formal application once planning consent is in place.</p> <p>I have also examined the drawings for the development and I would like to take this opportunity to make the following recommendations and highlight the</p>	<p>Observations have been taken into account and amendments to the plans made where possible. An appropriate condition will be included with any grant of planning permission.</p>

Stakeholder	Question/Comment	Response
	<p>following concerns:</p> <p>Recommendations:</p> <p>All External Dwelling Door-Sets should be certificated to one of the following standards:</p> <ul style="list-style-type: none"> • PAS 24:2012 (PAS 24:2016) • LPS 1175 Issue 7.2 (2014) Security Rating 2 or higher • STS 201 Issue 4:2012 • STS 202 Issue 3 (2011) Burglary Rating 2 • LPS 2081 Issue 1 (2015) Security Rating B or higher <p>All easily accessible windows should be certificated to one of the following standards:</p> <ul style="list-style-type: none"> • PAS 24:2012 • PAS 24:2016 • STS 204 Issue 4:2012 • LPS 1175 Issue 7.2 (2014) Security Rating 1 • STS 202 Issue 3 (2011) Burglary Rating 1 • LPS 2081 Issue 1 (2015) Security Rating A <p>Communal entrance door-sets should be certificated to:</p> <ul style="list-style-type: none"> • LPS 1175 Issue 7.2 (2014) Security Rating 2 or higher <p>Developments containing more than 25 dwelling should have an access control system with following attributes:</p> <ul style="list-style-type: none"> • Access to the building via use of a restricted electronic key fob, card or key • Vandal resistant external door entry panel with an integral camera • Remote release of the primary entrance door-set from the dwelling • Audio/visual communication between the occupant and the visitor • Capture (record) images in colour of people using the door entry panel 	

Stakeholder	Question/Comment	Response
	<p>Lightweight Framed Walls: The security of a development can be severely compromised if lightweight framed walls do not offer sufficient resilience to withstand a criminal attack; this is recognised within Approved Document Q.</p> <p>Lightweight framed walls installed either side of a secure door-set (600mm for the full height of the door-set to restrict access to door hardware) or walls providing a partition between two dwellings, or a dwelling and shared communal space, shall meet the requirements below.</p> <p>Wall systems proven to meet the requirements of the following standards are preferred:</p> <ul style="list-style-type: none"> • LPS 1175 Issue 7.2 (2014) Security Rating 1 • STS 202 Issue 3 (2011) Burglary Rating 1 • EN 1627: 2011 Resistance Class 2 <p>Compartmentalisation: Larger developments can suffer adversely from anti-social behaviour due to unrestricted access to all areas and floors of the building. We therefore seek to curtail unlawful free movement throughout the building through the use of an access control system.</p> <ul style="list-style-type: none"> • Controlled lift access – each resident is assigned access to the floor on which their dwelling is located via the use of a proximity reader, swipe card or key fob. • Dedicated door-sets on each landing preventing unauthorised access to the corridor from the stairwell. Each resident should be assigned access to the floor on which their dwelling is located. <p>Car Park: We recommend automatic roller shutters certificated to LPS 1175 SR1 are used over inward opening gates due to the operation speed to prevent tailgating.</p>	

Stakeholder	Question/Comment	Response
	<p>Concerns:</p> <p>Communal Entrance: The communal entrance is shown at street level as a gate set in a perforated screen. We would highly recommend this is changed to a solid wall, with purpose built communal entrance door-set tested to Loss Prevention Standard 1175 Security Rating 2 or above (LPS 1175 SR2).</p> <p>To date there are no security tested gates that meet the demands of a communal entrance. As the first line of defence it is vital the communal entrance is secure and will cope with constant use.</p> <p>Communal Entrance Hall: We would always highly recommend that an ‘air lock’ style lobby is created at communal entrances to help prevent tailgating and provide an additional layer of security. As this does not appear possible from the design, we would recommend the stairwells are secured on each level with a secure LPS 1175 SR2 door-set and the lift has an access control system preventing unauthorised access to the residential floors.</p> <p>Mail Delivery: The boxes are currently shown under the stairs in the entrance. We would discourage this as it means the postman or delivery personal has to enter the building and then has access to the residential floors above. We would recommend that ‘through-the-wall’ post boxes are installed in the wall adjacent to the communal entrance. Post boxes of this design must be tested to Technical Standard 008(TS008).</p> <p>Lift access: The design shows the lifts provide access straight out on the either the podium courtyard or residential landings without any access control points. As such</p>	

Stakeholder	Question/Comment	Response
	<p>the lifts must have an access control system in place to prevent unauthorised access.</p> <p>Bin Store: The current design shows the bin store has both an external door and an internal door. We would highly recommend the internal door is removed to decrease the opportunity for intrusion into the building. All refuse store door-sets should also LPS 1175 SR2.</p> <p>Cycle Storage: The residential cycle store shows storage for 80 bicycles. It is important that the cycle stores are broken down into smaller units with dedicated access so that only 20 bicycles can be accessed at a time. Cycle store door-sets must be LPS 1175 SR2 or above.</p> <p><u>The National Planning Policy Framework (NPPF)</u> The NPPF states that “Planning policies and decisions should aim to ensure that developments create:</p> <ul style="list-style-type: none"> • Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. • Safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas”. <p><i>Whilst I accept that with the introduction of Approved Document Q of the Building Regulations from 1st October it is no longer appropriate for local authorities to attach planning conditions relating to technical door and window standards, I would encourage the planning authority to note the experience gained by the UK police service over the past 26 years in this specific subject</i></p>	

Stakeholder	Question/Comment	Response
	<p><i>area.</i></p> <p><i>This experience has led to the provision of a physical security requirement considered to be more consistent than that set out within Approved Document Q of the Building Regulations (England); specifically the recognition of products that have been tested to the relevant security standards but crucially are also fully certificated by an independent third party, accredited by UKAS (Notified Body). This provides assurance that products have been produced under a controlled manufacturing environment in accordance with the specifiers aims and minimises misrepresentation of the products by unscrupulous manufacturers/suppliers and leads to the delivery, on site, of a more secure product.</i></p> <p><i>I would therefore request that the benefits of certified products be pointed out to applicants and that the Local Authority encourages assessment for this application.</i></p> <p><i>For a complete explanation of certified products please refer to the Secured by Design guidance documents which can be found on the website www.securedbydesign.com</i></p> <p><i>Having reviewed the application and available documentation, I have taken into account not only Approved Document Q but also the proposed design and layout, there is no reason why, with continued consultation with a DOCO and the use of correct tested, accredited and third party certificated products that this development would not be able to achieve Secured by Design Gold award.</i></p> <p><i>I would therefore seek to have a planning condition submitted where this development must achieve Secured by Design accreditation.</i></p> <p><i>Therefore I would ask this development to fully adopt where possible and</i></p>	

Stakeholder	Question/Comment	Response
	<p>appropriate, the practices and principles of 'Secured by Design' and aim to achieve accreditation.</p> <p>Should the applicants or the Planning Authority have any queries, please do not hesitate to contact this office either by email - DOCOMailbox.NE@met.pnn.police.uk or telephone quoting the reference number shown above.</p> <p>I would ask that my interest in this planning application be noted and that I am kept apprised of developments.</p> <p>Applicant Response</p>	
London Fire Service	<p>The Brigade is not satisfied with the proposals for fire fighting as compliance with Part B5 of the building regulations is not shown.</p> <p><u>Update</u></p> <p>The applicant has provided additional comments in respect of fire fighting plans. The Fire Service then responded as follows:</p> <p>The Brigade is satisfied with the proposals for fire fighting as detailed in your letter dated 14th March 2017.</p>	Comments noted.
Network Rail	<p>After reviewing the information provided in relation to the above planning application, Network Rail has no objection or further observations to make.</p>	Comments noted.
Natural England	<p>Natural England's comments in relation to this application are provided in the following sections.</p> <p>Statutory nature conservation sites – no objection</p>	Comments noted.

Stakeholder	Question/Comment	Response
	<p>Natural England has assessed this application using the Impact Risk Zones data (IRZs). Natural England advises your authority that the proposal, if undertaken in strict accordance with the details submitted, is not likely to have a significant effect on the interest features for which Lee Valley SPA & Ramsar have been classified. Natural England therefore advises that your Authority is not required to undertake an Appropriate Assessment to assess the implications of this proposal on the site's conservation objectives.</p> <p>In addition, Natural England is satisfied that the proposed development being carried out in strict accordance with the details of the application, as submitted, will not damage or destroy the interest features for which the Walthamstow Reservoirs SSSI has been notified. We therefore advise your authority that this SSSI does not represent a constraint in determining this application. Should the details of this application change, Natural England draws your attention to Section 28(I) of the Wildlife and Countryside Act 1981 (as amended), requiring your authority to re-consult Natural England.</p> <p>Protected species</p> <p>We have not assessed this application and associated documents for impacts on protected species. Natural England has published Standing Advice on protected species.</p> <p>You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation. The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.</p> <p>If you have any specific questions on aspects that are not covered by our</p>	

Stakeholder	Question/Comment	Response
	<p>Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at consultations@naturalengland.org.uk.</p> <p>Biodiversity enhancements This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that <i>'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'</i>. Section 40(3) of the same Act also states that <i>'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'</i>.</p> <p>Landscape enhancements This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.</p> <p>Sites of Special Scientific Interest Impact Risk Zones The Town and Country Planning (Development Management Procedure)</p>	

Stakeholder	Question/Comment	Response
	<p>(England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk</p>	
<p>Historic England - Archaeology</p>	<p>The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.</p> <p>The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should submit desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision. If planning consent is granted paragraph 141 of the NPPF says that applicants should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence publicly available.</p> <p>The planning application lies in an area of archaeological interest.</p>	<p>Comments and recommended conditions noted.</p>

Stakeholder	Question/Comment	Response
	<p>The application site lies on the low gravel terrace of the Lea with coverings of brickearth, a geology that has elsewhere been archaeologically productive. It lies at the eastern edge of the medieaval settlement of Page Green that developed along the old Roman to the west. There is potential for early prehistoric Arctic Beds to be present in the gravel and although later remains have not been recorded nearby, this may be more connected to a lack of formal investigation than a genuine dearth. The site also stands just to the north of a small tributary to the Lea, Stonebridge Brook now culverted, which may have made it more attractive to past settlement.</p> <p>Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates the need for field evaluation to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a condition could provide an acceptable safeguard. A condition is therefore recommended to require a two stage process of archaeological investigation comprising: first, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. The archaeological interest should therefore be conserved by attaching a condition as follows:</p> <p>No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</p> <p>If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall</p>	

Stakeholder	Question/Comment	Response
	<p>be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p> <p>A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works;</p> <p>B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.</p> <p>Informative - Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.</p> <p>I envisage that the archaeological fieldwork would comprise the following:</p> <p>Evaluation An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.</p>	

Stakeholder	Question/Comment	Response
	<p>Further information on archaeology and planning in Greater London including Archaeological Priority Areas is available on the Historic England website.</p> <p>Please do not hesitate to contact me should you require further information or assistance. I would be grateful to be kept informed of the progress of this application.</p> <p>Please note that this response relates solely to archaeological considerations. If necessary, Historic England’s Development Management or Historic Places teams should be consulted separately regarding statutory matters.</p> <p><u>Additional Comments after further information was provided by the applicant</u></p> <p>I’ve looked at the desk-based assessment which complies with the appropriate professional standards.</p> <p>I am pleased to note that the authors consulted the Lea Valley Mapping work and also carried out a site visit as well as identifying areas of differential preservation.</p> <p>The study agrees with the earlier GLAAS advice. It identifies potential for prehistoric remains to be present at the site and it also notes that the lack of past investigation nearby makes it hard to provide firm evidence. Fieldwork is therefore the appropriate next step to evaluate whether any significant remains are present in the development footprint.</p> <p>Following this new submission, I do not advise any change from my earlier advice (attached), namely that an archaeological condition securing archaeological trench evaluation of the site and possible mitigation work following this is the appropriate NPPF planning response.</p> <p>I hope this is helpful and would be pleased to discuss further if appropriate.</p>	

Stakeholder	Question/Comment	Response
LOCAL REPRESENTATIONS		
	<p>Scale of development is excessive:</p> <ul style="list-style-type: none"> • Excessive height 	<p>Although the development is relatively high given the surroundings residential tower blocks of a similar scale are visible in the surrounding area, and the high visual permeability of the structure reduces the apparent bulk that may be perceived from height alone.</p>
	<p>Negative impact on residential amenity:</p> <ul style="list-style-type: none"> • Loss of day/sunlight • Loss of privacy 	<p>An independent study has found that indicative BRE thresholds have not been unacceptably exceeded in terms of restricting day or sunlight to individual windows of nearby residential properties. Furthermore,</p>

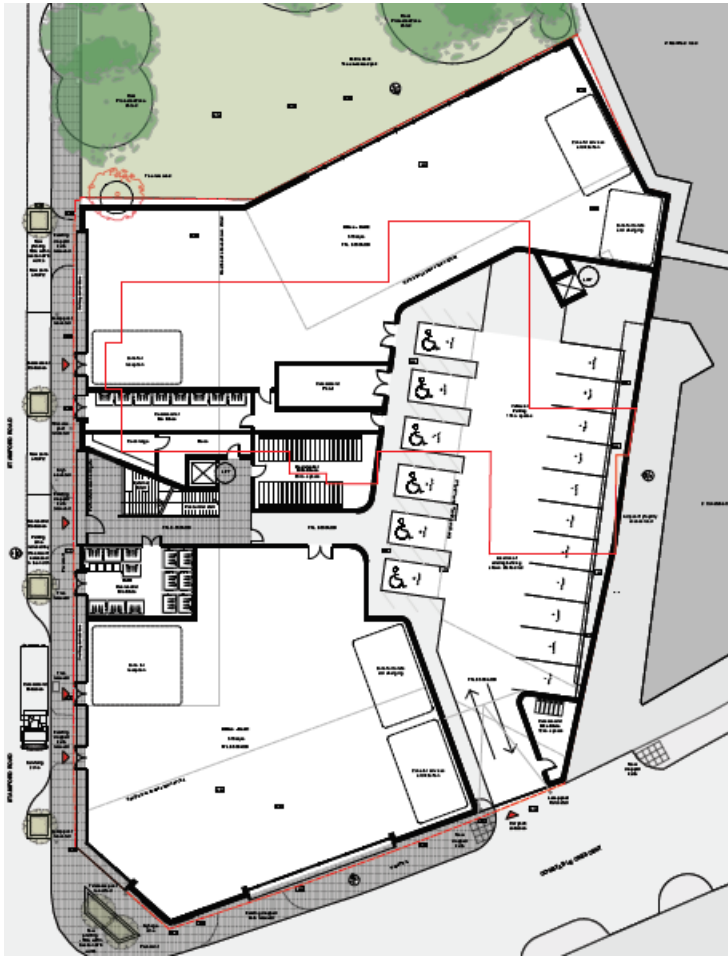
Stakeholder	Question/Comment	Response
		windows to habitable rooms and balconies for the new flats would be located facing away from properties on Stamford Road, other than those on the eastern block which would instead be located a significant distance away.

Appendix 2: Plans and images

Existing Location Plan



Ground and First Floor Plans



Indicative Affordable Workspace Layout



Elevations from South and North along Stamford Road





Indicative View of the Development from the East on Constable Crescent



Indicative View of the Development from the Adjacent Park



Appendix 3: Quality Review Panel Reports

First Review – 7th September 2016

Summary

The Quality Review Panel welcomes the clear presentation, and is encouraged by the level of thought evident in the proposals. It was clear from the discussion that the development will benefit from the involvement of a client who knows the area well and is committed to ongoing occupation of part of the site. However, the panel questions some fundamental design decisions that have been taken, particularly the decision to locate the residential accommodation on a podium above ground floor employment space. This seems to be an overly complicated response to the brief that compromises the quality of both uses: ground floor offices are not particularly successful in a residential street, and the gated residential community above the podium would have an inward looking feel which would do little to enhance the character of Stamford Road or the park to the north. Looking at the opportunities and constraints presented by the site, the panel would encourage consideration of a simpler approach, in which the office uses are located in a building at the southern or eastern side of the site, which would leave the western and northern parts of the site free for a high quality residential development that could have a positive relationship both with the park and the houses on the opposite side of Stamford Road.

However, if a podium approach is to be retained, the panel highlights a number of specific areas with scope for improvement, which include: improving the interface with the park at the north of the site; reducing the scale of the block of accommodation at the eastern boundary; and improving the entrances to the residential accommodation. Further details on the panel's views are provided below.

Massing and development density

- The panel notes that a 'podium' model of development may be appropriate in some contexts; however this is typically in active and busy urban areas, compared to the comparatively low-rise, quieter area around Stamford Road.
- They consider that a simpler approach would be more appropriate here which locates the office uses in a single building on the southern or eastern side of the site, leaving the northern and western parts of the site free for a high quality residential development.
- However, if a podium configuration is to be pursued, very careful detailed design is required in order to mitigate some of its inherent problems.
- For instance, the panel feels that the seven storey block of accommodation to the east of the site has an overbearing relationship with the adjacent two storey industrial unit.
- They would suggest a reduction in building height at this boundary, perhaps limited to four storeys.

- This could help facilitate improvements to the amenity and quality of this block, in addition to establishing the ground rules for the massing of the future development of adjacent sites.

Place-making, character and quality

- The panel considers that office use at ground floor does not deliver an active frontage at street level; occupiers often choose to screen off windows to give privacy to staff working within. In any event, Stamford Road is a largely residential street where ground floor office uses would be incongruous.
- At the same time, placing all the residential accommodation above a first floor podium creates a gated community that makes little contribution to the character of Stamford Road or the park to the north.
- In terms of liveability, surveillance and neighbourliness, the panel would recommend the provision of residential accommodation with front doors onto Stamford Road and, ideally, also onto the park to the north..
- Improvements to the interface with the park at the northern boundary could significantly enhance the value and amenity of the park; the panel feels that the potential benefit is not sufficiently exploited.
- The panel welcomes the applicant's intention to contribute to park improvements through a Section 106 agreement.

Relationship to surroundings: access and integration

- If the podium approach is to be retained there is a need to provide a more generous communal entrance from the street and improve the design of the stairs, lifts and bin storage etc. High levels of visibility should be provided to lifts and stairs, especially with regard to residential accommodation located above a podium.
- Access to the residential accommodation needs to be able to support all of the different activities and functions involved in a residential setting, and the entrance should be clearly navigable and accessible for visitors and deliveries, and should be carefully considered with regard to waste management/collection.
- The panel welcomes the gaps created between the blocks of accommodation, and would encourage the design team to increase the generosity of these spaces, to improve visual links into and out of the site.
- The panel notes that the plans show windows within the eastern-most block of accommodation 1m away from the boundary; this is unlikely to be acceptable.

Scheme layout, architectural expression and sustainable design

- The overall architectural expression of the scheme could be successful for this location although the panel notes that a dark grey brick is proposed within the scheme, and thinks lighter materials should be considered.
- A more generous approach is required for the internal elements of the plan, which seem quite constricted, especially with regards to the parking.
- The office accommodation shown within the plan is deep in section and single aspect (due to the podium level); this will have an impact on the quality of office space particularly facing north, due to limited daylight penetration. A more successful approach would be to locate the offices in a single building with improved daylight and a shallower plan.
- The panel would like to know more about the strategic approach to energy efficiency and environmental sustainability for the scheme as a whole.
- They would also like to see more information about the detailed design of the central courtyard, if the podium approach is to be pursued further.

Next Steps

- The panel would prefer to see a simpler approach to the configuration of the accommodation and distribution of uses on site, which would avoid the use of a podium model of development that is inappropriate in a suburban context.
- The panel would welcome the opportunity for further review of the proposals.

Second Review – 26th April 2017

Summary

Whilst the Quality Review Panel would have liked to have seen an alternative approach taken to development on the site, they understand the practical constraints that have driven the current form of the proposals as a podium, and in this regard, they offer warm support for the scheme. They feel that the proposals have responded to the key points that were raised by the panel at the previous review, and appreciate the ambition of the scheme. Ideally, they would support some further refinement of the ground floor offices and edge treatments, in order to bring them up to the quality of the accommodation above the podium. Further details on the panel's views are provided below.

Massing and development density

- The panel feels that the scale and bulk of the proposals (both in depth and height) are just within the limits of what is acceptable for the site. In addition, the dimensions of the podium courtyard (18-20m) and the scale of the blocks forming the courtyard are also within acceptable limits.

- The panel previously noted that the relationship to the adjacent site at the east was a challenging one. The block at the east of the site has been reduced from 7 storeys to 6 storeys, which is acceptable given that the site immediately adjacent is protected for industrial uses.
- The block fronting onto the open space at the north of the site will cause some overshadowing of the park, but this negative impact will be offset by the good level of surveillance afforded from the windows and balconies that will overlook the space, and will help to activate it.

Quality of accommodation and scheme layout

- The panel notes that the office spaces at ground level are a key part of the scheme, and would encourage further refinement of the detailed design in order to ensure high quality accommodation.
- The office accommodation relies on natural light, and is all currently shown as directly fronting onto the pavement or onto the edge of the park.
- Further thought about the detailed design and size of the office windows could strike a better balance between the conflicting needs for providing good levels of daylight whilst allowing for privacy.
- The panel would also encourage exploration of whether parts of the podium courtyard could be opened up (e.g. with roof lights, or completely open to the elements) to allow light and natural ventilation to the rear of the office accommodation.
- The panel welcomes the increased space given to the pedestrian access up to the podium level residential accommodation, but notes that it is flanked either side by bin storage areas.
- Whilst they understand that locating the bin stores on Stamford Road has been driven by practical considerations concerning waste collection, they feel that robustness within design and detailing, in tandem with a strong management strategy, would be necessary to mitigate any negative impacts.

The panel notes that the building line of the development is hard up against the boundary of the park, which is not ideal. Agreement would need to be reached with the Borough to allow necessary access for maintenance from the park, and some planting along this edge of the park may be required to provide some privacy and protection for the office users.

- The panel supports the architectural expression of the scheme, and feels that the proposed red brick responds well to the existing context of Stamford Road.

Inclusive and sustainable design

- The panel understands that Diamond Build intends to manage the affordable workspace provision; they welcome this long-term commitment to the development and to the locality.
- They note that a successful model used in other schemes has been the transfer of the affordable workspace to a charity which takes on the management of the affordable workspace, and would hope that Diamond Build could provide a similar assurance that would guarantee affordability over the long term.
- The panel is surprised that no affordable housing is to be included within the development, given the relatively modest size of the affordable workspace.

Next Steps

- The panel understands the challenges and constraints within the site, and in this regard, offers warm support for the proposals.
- The panel is confident the project team will be able to address the minor points above, in consultation with Haringey officers.

Appendix 4: Development Management Forum – Briefing Note

Attendees

3 attendees were present. One resident was from Stamford Road, and two individuals from O'Donovan's.

No Councillors were present.

Overview

The Forum was advertised to residents by Haringey Council via A4 signs posted around the site. The Forum was held at Markfield Park cafe.

The Forum was led by the Head of Development Management.

Generally, the discussion was robust and attendees had the chance to raise any concerns or questions and have them answered by officers or the project team.

Issues

Issue	Detail
Site Allocation	The site allocation was noted to be an evidence base that indicates possibilities for future development proposals and is not a prescriptive threshold for the upper limits or mix of any future development.
Design	Attendees generally accepted that the design was of high quality and should improve the visual quality and security of the local environment.
Park Improvements	Improvements to the park (north of the development site) are proposed as part of the application and these are welcomed by local residents. Further information is to come from the applicants on the detailed design of the park and further group discussions will be held before any works commence if the development is approved.

Overlooking/Privacy

Balconies on the corner with Stamford Road and the adjacent park have been identified as potentially leading to overlooking.

These will be assessed and removed where possible to prevent excessive overlooking.

Other issues raised:

- Development could negatively impact on operations of the nearby O'Donovan premises