

APPENDIX 3 – Consultation Responses – Internal and External Consultees

Stakeholder	Representations	Officer comments
Internal:		
Transportation	<p>Site Location and Context</p> <p>The site records a public transport access level (PTAL) of 6a (with 0 being the worst and 6b being the best). The closest rail stations are Seven Sisters and South Tottenham approximately 500m and 740m from the site respectively. Seven Sisters station offers Victoria Line services between Brixton and Walthamstow via Central London; and rail services between Cheshunt/Enfield and London Liverpool Street. South Tottenham station offers rail services between Barking and Gospel Oak. The site is served by 10 bus routes consisting of 349, 259, 279, 243, 318, 476, 149, 76, 41 and W4. These bus routes offer a combined frequency of 86.5 buses per hour during peak periods.</p> <p>Bernard Road is part of LBH's local road network and is included in a controlled parking zone (CPZ), which operates Monday to Saturday 8AM to 6:30PM. Bernard Road is a narrow two-way street, with parking bays in part of the road partially on the footway. The site is bounded to its east by Ashby Road. The nearest part of the Transport for London Road (TLRN) is High Road Tottenham (A10), approximately 400m to the west of the site.</p> <p>The cycle network in the vicinity of the site consists of a mixture of on and off-road cycle routes including quiet backstreets and canals and park routes. Cycle Superhighway 1 (CS1) runs along High Road (A10) to the west of the site.</p> <p>Policy Context</p> <p>London Plan Policies Policy 6.1 & 6.2 – 6.14</p> <p>The policies sets out the strategic approach to transport and encourages patterns of developments that reduce the need to travel, especially by private car; promotes improved capacity and accessibility of public transport, walking and cycling; promotes improvements to interchanges between different forms of transport, especially around rail and underground stations; supports measures that encourage a shift to sustainable modes and appropriate demand management; promotes greater use of low carbon technologies aimed at reducing carbon emissions from transport; and seek to promote walking through improving the public realm. Policies 6.2 to 6.14 sets out the Mayor's specific requirements for all modes and the approach that Local Authorities in London should take in assessing major development proposals.</p> <p>Policy 6.13, of the London Plan sets out car parking standards, and strategic direction to facilitate new developments with appropriate levels of parking. It indicates that, maximum car parking standards for residential developments in the outer London with a high PTAL is up to 1 space per unit. LBH is identified on the map 2.2, as part of the outer London.</p> <p>Parking addendum to Chapter 6 has recommendations for blue badge holders indicating that: for residential developments, requirement is a provision for at least one accessible on or off-street parking space. It is also stated that when off-street parking is provided then at least two parking spaces should be for blue badge holders.</p>	<p>Comments noted and taken into account. The recommended s106 requirements and conditions will be included with any grant of planning permission, as appropriate.</p>

Draft London Plan

PolicyT6 Car parking of the emerging draft London Plan indicates that car-free is the starting point for all developments, which are, or planned to be, well connected. Table 10.3 has the maximum parking standards based on location and PTAL score. The recommended maxima for development site in locations of PTAL 2 is up to 1 space per unit.

Policy DM31 promote high trip generating developments in areas of high public transport accessibility, where the generated car travel can be minimised. The policy encourages walking and cycling and promotes improved pedestrian and cycle routes and links with public transport facilities. Policy DM32 supports limited or no on-site car parking in areas of PTAL 4 and above, where a controlled parking zone (CPZ) exists or will be introduced prior to the occupation of the development.

Relevant Planning Context

The application refers to the planning consent for the Bernard Works development, which was granted by LBH in 2018. This consent secures significant changes to the local highway network and delivers considerable public realm benefits. The proposed highway works under the Bernard Works consent consists of: (1) the removal of a section of Herbert Road (to be stopped up under s.247 TCPA 1990); (2) introduction of a new highway link between Bernard Road and Norman Road; (3) widening of Ashby Road to provide additional on-street parking on its western side; and (4) changes to existing on-street parking the affected streets, amending the existing traffic management orders (TMOs) accordingly.

Trip Generation and Impacts

The principles and methodologies for assessment of the residual highway and transportation impacts of the development were discussed at the pre-application stage and are acceptable. The TRICS sites used to derive the trips rates for calculating the trip generation are suitable comparator sites and therefore the trip rates are accepted.

The forecasted trip generation for the residential part of the development is 35 two-way person trips in the AM peak period and 31 two-way person trips on the PM peak period (presented in the Table 5.3 of the Transport Statement). The proposed residential use is not expected to generate any vehicle trips during the AM and PM peak periods and as such, no impacts on the adjoining road network will be created.

The anticipate person trip generation for the commercial use (as presented above) is 8 two-way movements in the AM and PM peak periods. The vehicle trip generation is predicted be 3 two-way trips for both peak traffic periods.

Overall (residential and commercial combined), the public transport trips are expected to be 25 and 22 two-way trips during the AM and PM peaks respectively. These additional trips by public transport is not expected to affect the capacity of the existing network.

In summary, the trip generation analysis has demonstrated to the transport officer's satisfaction that the additional trips generated by the development can be accommodated within the capacity of the local public transport services and no material impacts on the highway impacts will be created. It should be noted that the assessment was based on the previous proposal for 53 residential units and the applicant has not provided an updated transport assessment that reflects the current proposal for 45 residential units. However, the reduction in residential units implies a reduction in the trip generation of the proposed development and as such the overall conclusions of the TA would be maintained.

Access and Parking

Pedestrian and cycle access is taken from Bernard Road. There are separate pedestrian/cycle entrances for the affordable and private residential units, which are afforded from the shared surface area between the site and the consented Bernard Works development.

The proposal does not include any on-site car parking. Given that the site is well-connected by public transport, car parking is not a priority. This accords with London Plan Policy 6:13 and draft London Plan Policy T6; and Haringey Policy DM32, which promotes car-free developments as a starting point for development sites in well-connected locations.

Policy T6.1 requires the provision of disabled parking space for 3 per cent of the residential units from the outset. This equates to two (2) spaces. The policy also requires development proposals to demonstrate how the remaining disabled parking spaces, up to ten percent of dwellings can be provided when requested. This would amount to five (5) no. disabled spaces in total. The applicant proposes four (4) on-street disabled parking spaces. Three (3) spaces are located on Ashby Road and one (1) space on the frontage of the site in Bernard Road. The principle of on-street disabled parking is acceptable, and it is noted that the proposed disabled parking in Bernard Works and Ashby Road does not result in the loss of standard parking capacity.

Cycle Parking

The proposal includes a total of 86 long-stay secure cycle parking spaces for the proposed residential units. These spaces are located on the ground floor level in the residential cores. 28 stacked spaces are provided in the affordable residential core. 58 spaces stacked spaces are provided in the private core. This accords with the London Plan in terms of quantum. Further thought should be given to the quality of cycle parking. Stacked cycle spaces are not suitable for non-standard bicycles, which would generally need to be accommodate with Sheffield stands. An appropriate number of Sheffield stands should therefore be included. Additionally, short-stay cycle parking for residential use, at the level recommended by the London Plan (1 per 40 units = 2 spaces) is required. 6 cycle parking spaces for commercial use is provided in the external amenity space. Short-stay cycle parking (1 space per 500sqm) is required. Details of cycle parking will need to be secured by condition.

Delivery and Servicing

The proposed highway alterations under the consented Bernard Works development has resulted in a removal of most of the site's frontage on Bernard Road and as such, delivery and servicing is proposed to be undertaken on the new link road between Bernard Road and Norman Road. The location where delivery and servicing will be undertaken is indicated on the proposed ground floor plan in the amended Design and Access Statement. The revised DAS suggests that servicing might be undertaken on the shared space, which will require large vehicles reversing from/onto Bernard Road. The applicant should clarify whether servicing will be accommodated on the share space. We do not support this arrangement. The arrangements for delivery and servicing will need to be set out in the final Delivery and Servicing Plan (DSP) to be approved by the Council prior to occupation of the development.

The delivery and servicing trip generation is not presented in the Transport Statement or the DSP but based on the scale and nature of the development, the number and frequency of these trips are not expected to create any undue traffic impacts. Nevertheless, the final DSP must include

the trip generation figures for delivery and servicing.
Construction Logistic Plan (CLP)
The applicant/ Developer is required to submit a final Construction Management Plan (CMP) and Construction Logistics Plan (CLP) for the local authority's approval 3 months (three months) prior to construction work commencing on site. The plans should provide details on how construction work (including demolition) would be undertaken in a manner that disruption to traffic and pedestrians on the adjoining roads, including the TLRN, will be minimised. It is also requested that construction vehicle movements should be carefully planned and coordinated to avoid the AM and PM peak periods.

The 'Construction Logistics Plan' (CLP), is recommended to be secured as a pre-commencement condition. The applicant can refer to the TfL's guidance document through this link when compiling this document.

External Highway Improvements Works

The proposal will necessitate highway improvement works in Bernard Road and Ashby Road. These works will include the removal of the existing vehicle crossover in Bernard Road and reinstatement/renewal of the footway and modifications to Ashby Road to accommodate the additional parking and improved streetlighting. Additionally, it assumed that the applicant will be contributing to the cost of the shared surface path that provides a through pedestrian/cycle link from Bernard Road to Ashby Road. Regarding these works, the applicant will be required to enter into a Section 278 Agreement.

Conclusions

To summarise, a car-free development as proposed accords with policy (London Plan Policy 6:13, Draft London Plan Policy T6 and LBH Policy DM32) proving that occupiers can be prevented from accessing permits to park in the adjoining CPZ. No significant impacts on the public transport and highway networks are envisaged. Cycle parking is adequate in terms of quantum, but details of cycle parking will need to be conditioned. A Construction Logistics Plan (CLP) detailing the arrangements for mitigating the impacts of construction traffic will need to be secured by legal agreement. The applicant will be required to enter into a Section 278 Agreement with the Council, to pay for any necessary highway improvements works. A Delivery and Servicing Plan (DSP) is to be secured by the appropriate legal mechanism.

S.106 Planning Obligations

On assessing this application, we have concluded that subject to the following S.106 obligation and conditions the transportation planning and highways authority would not object to this application

1. Car-free Development

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

2. Travel Plan (Residential)

Within six (6) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses shall have been submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for

advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring and review to be agreed in writing by the Local Planning Authority, we will require the following measure to be included as part of the travel plan in order to maximise the use of public transport:

- a) The developer must appoint a travel plan coordinator, to monitor the travel plan initiatives annually for a minimum period of 5 years.
 - b) Provision of welcome induction packs containing public transport and cycling/walking information like available bus/rail/tube services, map and timetables, to every new resident.
 - d) We will also like to see Travel Information Terminals erected at strategic points within the development, which provides real time travel information
 - e) the travel plan must include specific measures to achieve the targeted mode shares by the 5th year.
 - f) The applicants are required to pay a sum of, £2,000 (two thousand pounds) per year per travel plan for monitoring of the travel plan initiatives.
- Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.

Car Club Scheme

3. Establishment or operation of a car club scheme, the developer must offer two years' free membership and £50 credit to all new residents.

Reason: To mitigate the parking demand generated by this development proposal on the local highways network by constraining car ownership and subsequent trips generated by car, resulting in increased travel by sustainable modes of transport hence reducing the congestion on the highways network.

4. Section 278 Highway Act 1980

The owner shall be required to enter into agreement with the Highway Authority under Section 278 of the Highways Act, in no less than three (3) months prior to occupation of the development, to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements. Unavoidable works required to be undertaken by Statutory Services will not be included in the Highway Works Estimate or Payment. In addition, the cost estimate is based on current highways rates of the permanent highways scheme. The developer will be required to provide details of any temporary highways scheme required to enable the occupation of each phase of the development, which will have to be costed and implemented independently of this cost estimate. The cost of the S.278 works must be indexed linked and reviewed annually or before the implementation of each phase of the highway works.

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

5. Construction Management Plan.

The applicant/ Developer is required to submit a Construction Management Plan (CMP) and Construction Logistics Plan (CLP) for the local authority's approval 3 months (three months) prior to construction work commencing on site. The Plans should provide details on how construction work (Inc. demolition) would be undertaken in a manner that disruption to traffic and pedestrians on the High Road, Bury Road and the roads surrounding the site is minimised. It is also requested that construction vehicle movements should be carefully planned and coordinated to avoid the AM and PM peak periods, the plans must take into consideration other sites that are being developed locally and where possible coordinate movements to and implement also measures to safeguard and maintain the operation of the

	<p>local highway network. Reason: to ensure that the impacts of the development proposal on the local highways network are minimised during construction, and to coordinate construction activities in key regeneration areas which will have increased construction activities.</p> <p>Conditions: 1.Cycle parking Design and Layout The applicant will be required to provide accessible cycle parking space in line with the Local Cycle design standard including details of how residents/staff will gain access to the cycle parking areas, and maintenance arrangements of the areas reserved for cycle parking 5% of all cycle parking spaces must be able to accommodate larger cycles. Cycle parking spaces must be available before the occupation, with all spaces retained thereafter. Reason: To promote travel by sustainable modes of transport and to comply with the London Cycle Design Standard.</p> <p>2.Delivery and Servicing Plan The owner shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The Delivery and Servicing Plan must include a Waste Management Strategy for the site, prepared in line with the Council's Waste Management service, setting out details of how refuse is to be collected from the site, and ensuring that all bins are within 10 metres carrying distance of refuse collection vehicles on waste collection days. Reason: To ensure that the development does not prejudice the free-flow of traffic or public safety along the neighbouring highway.</p>	
<p>Urban Design</p>	<p>Planning Policy Context 1.The site is adopted, as "TH12: Herbert Road" in Haringey's Local Plan; Tottenham Area Action Plan (AAP) Development Plan Document (adopted July 2017). The larger part of this allocation site is outside of this application site, namely the site on the opposite, north side of Bernard Road, known as Bernard Works. The site allocation reads: Potential redevelopment of the sites for mixed-use employment-led development. Site Requirements are that development should maximise employment uses, making provision for affordable workspace, with residential uses also permitted, which should particularly be located adjacent to existing neighbouring residential properties. Guidelines include rationalising the "parallel access roads" on Ashby, Barnard & Herbert Road and improving streetscape on Ashby Road. 2.Bernard Works, the remainder of the allocation site, to the north of this site, has an existing planning permission (HGY/2017/3584). This proposal, in accordance with the allocation, is for mixed uses with employment on much of the ground floor, with residential above, including the whole of the Ashby Road frontage. It also provides a new public park at the southern edge of their site, immediately adjacent to this application site, with vehicular traffic on Bernard Road (excepting for access) being diverted north along the western edge of their site, removing the "duplicated" road parallel to Ashby Road, turning Ashby Road into a double sided residential street. Principal of Development 3.The principle of development with the proposed residential and employment uses is established by and in accordance with the Site Allocation. It is also in accordance with and complimentary to the approved</p>	<p>Noted. Comments noted and taken into account in the final design of the proposed development</p>

Bernard Works proposals.

Form, Height, Bulk & Massing

4.The form of the proposal is of a terrace along Bernard Road, turning the corner into Ashby Road, built up to the boundaries, with party walls to the adjacent street-facing properties to the west on Bernard Road and south on Ashby Road. However, the terraced form is broken into three distinct blocks; a four storey block forming the corner of Ashby & Bernard Roads, and two six storey blocks along Bernard Road. The first six storey block is joined to the four storey block, but there are gaps, filled with a single storey continuation of the ground floor and a high wall to shelter a first floor amenity deck, between the two six storey blocks and between the western block and the edge of the site.

5.The overall strategy of these proposals on height, of part one storey, part four and part six, responds to prevailing and approved neighbouring heights. This range of heights is appropriate for a larger site in a higher density urban location, with good public transport accessibility (it has a very good PTAL of 6a) that is nevertheless surrounded by 2 and 3 storey existing buildings.

6.Specifically, the four storey part of the proposal represents a step up of two floors across Ashby Road from the existing neighbouring two storey houses to its eastern side, as the previously approved Bernard Works scheme does, which is a reasonable step-up the same as that found elsewhere including at the northern end of the street to the backs of properties on Newton Street to its north, and on the next parallel street to the east, Stamford Road, where two storey terraced houses back onto those on Ashby Road, but switch to four storeys at its junction with Newton Road. To the south and west of this site the adjoining industrial and office buildings range from one to three storeys. The approved Bernard Works scheme itself rises to seven floors at the western end of its range facing the application site across the proposed park, a range which steps from four to six to five to seven storeys.

7.Further afield there are a number of taller buildings in the neighbourhood, including higher rise housing blocks north of Newton Road, on Tottenham High Road a couple of blocks to the west and taller large industrial buildings a couple of blocks to the east, but this proposal is not by any definitions a tall, or even taller building; its eight would fit within the prevailing lower-medium rise general urban grain context. The form, being of terraced properties lining and addressing streets, but broken up with gaps, also matches the typical form of the neighbourhood.

Elevational Treatment, Materials and Fenestration, including Balconies, and Aspect

8.All the elevations are designed with care and considerations for proportions and composition, with a restrained, orderly fenestration pattern in a restrained brick palette that reflects a contemporary reinterpretation of industrial architecture and the so called “New London Vernacular”. The elevational composition creates a strong vertical rhythm into a regularly spaced repeating pattern, comparable to the typical plot width of the surrounding residential streets.

9.All balconies are recessed, which provides privacy to residents, hides clutter on residents balconies from the street and fits into the orderly, repetitive and well composed elevational treatment.

10.In terms of aspect, it is preferable for proposed flats to have habitable rooms with windows facing in more than one direction, providing daylight

and if not northerly, sunlight and views from different directions; if they face only in one direction they are defined as single aspect. North facing single aspect flats are particularly to be avoided, as they would lack sunlight, have poorer daylight and feel cooler, lacking any passive solar gain. South facing single aspect flats are strongly discouraged as they can suffer from overheating and too much sunlight. No flats in the proposed development are north facing single aspect, nor are any south facing single aspect. In total there are only six single aspect flats, all east facing, at 1st, 2nd & 3rd floor. All these also benefit from side windows onto their balconies, although this aspect is not considered a problem at all. Overall, the aspect of the proposed flats is considered exemplary for a higher density, urban development.

Residential Quality; flat, room & private & communal amenity space shape, size and quality

11.All maisonette, flat and room sizes comply with or exceed minima defined in the Nationally Described Space Standards, as is to be routinely expected.

12.All flats have private amenity spaces, whether balconies or roof terraces, in accordance with or exceeding the standards set in the Mayors Housing SPG. Two flats, PR101 & 102, benefit from very large private 1st floor roof terraces of 31sq m, well in excess of the requirement. In addition all flats benefit from access to two private communal amenity spaces. All three cores have access to the ground floor rear private amenity space / childrens' playspace, the largest outdoor amenity space in the proposed development. Each core also has access (the middle core via their common entrance and the eastern core), to a private roof terrace; in the western core's case at 1st floor, in the eastern core, at 5th floor. This is a high standard of private amenity space provision, offering a number of different characters, functions and levels of privacy, from space exclusive to each flat, through roof terraces shared by just those sharing the same street entrance door, to all residents of the development being able to share the largest space, with its play equipment.

13.The development will also be able to benefit from the provision, by the neighbouring developer, of the new park they will provide, literally right outside the front doors of this development.

Privacy / Overlooking of Proposed Residents and Existing Neighbours

14.The only existing neighbouring residents close enough to potentially have their privacy affected by this proposal are those to the east, on the other side of Ashby Road. These will face each other across a public street, where there is less expectation of privacy than there would be across back gardens. The distance between the existing and proposed buildings across Ashby Road is approximately 20m, which is in excess of the 18m distance considered by experts to be the maximum distance at which a human face can be recognised. The distance to the proposed permitted Bernard Works development to the north of the site, across the proposed park, is greater still. Both the street and, even more so, the proposed park, will provide enhanced privacy to upper floor residents through trees proposed for those spaces.

15.Residents of the ground floor flats within this proposed development could have concern at privacy to rooms facing the street. This is particularly a concern for bedrooms. On the ground floor of the proposed scheme, one bedroom to Flat PR001, two bedrooms to PR002, three bedrooms, the living room and external amenity space to PR003 (which is a corner flat that only faces the street) and one living room to PR004 face the street. In all cases except part of PR003, windows are set back from the pavement by a

screen of defensible planting of 1m deep or more; where this is not the case in PR003, the windows concerned look onto a recessed balcony rather than directly onto the street. Therefore appropriate design measures will prevent a privacy concern to proposed residents arising.

16. There would also be a legitimate concern, albeit lesser than that from neighbouring residents and from the public realm, that residents receive privacy from neighbouring communal amenity spaces, including from the noise from play spaces. The three ground floor flats that face onto the ground floor amenity space, where the children's play space will be, are particularly well buffered, with deeper private balconies and buffer planting, which are also provided to the two flats that face onto the 1st floor roof terrace, whilst no flats face onto the 5th floor terrace.

Daylight and Sunlight

17. Of relevance to this section, Haringey policy in the DM DPD DM1 requires that:

"...Development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours. The council will support proposals that:

- a. Provide appropriate sunlight, daylight and open aspects (including private amenity spaces where required) to all parts of the development and adjacent buildings and land;
- b. Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and residents of the development..."

18. The applicants provided Daylight and Sunlight Report on their proposals and of the effect of their proposals on neighbouring dwellings. These have been 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), known as "The BRE Guide".

19. The assessment finds that the impact of the development on existing neighbouring residential properties is generally favourable for both daylight and sunlight, with only some, modest detrimental effects on windows. The applicants' consultants carried out a 25° line screening tests on all neighbouring properties, and then carried out daylight (Vertical Sky Component – VSC, and Daylight Distribution – DD) and where appropriate sunlight access numerical tests on neighbouring properties. This included all the properties facing the application proposal on the opposite side of Ashby Road and the consented proposed Bernard Works development.

20. This assessment found four existing properties in Ashby Road and ten properties in the as yet unbuilt consented neighbouring Bernard Works scheme would fall below the daylight levels recommended in the BRE Guide to a noticeable degree. However, although these would fall below the 27% recommended VSC, most would be to between 20 & 30% less than their previous values (the BRE Guide finds that reductions of below 20% would not be noticeable); just 4 properties, all in the proposed but as yet unbuilt Bernard Works, would lose more than 30% of their daylight. The existing properties assessed to be affected are nos. 19, 20, 21 & 22 Ashby Road; in each case these are only two of five (or in the case of no. 20, three of five) windows facing the property, and all these properties are dual aspect, with windows on their eastern, garden façade unaffected. The proposed properties are not yet built let alone inhabited, and as the site of this application also an Allocated Site within the same site allocation as the

Bernard Works development, the potential for a development on this application site should be expected, whilst no existing residents will be affected. This is considered overall to be a very good impact on daylight to neighbours of this application proposal, better than the typical effect of developments on neighbours in higher density urban locations.

21. The assessment found five neighbouring existing properties in Ashby Road and two neighbouring permitted proposed properties in Bernard Works would receive less sunlight to applicable living rooms. In all cases this would be just to their Annual Probable Sunlight Hours (APSH), whilst they would continue to receive Winter Probable Sunlight Hours (WPSH) in excess of the minimum recommended in the BRE Guide. The loss of sunlight is between 20 and 30% in two cases, between 30 and 40% in the other three. As above it should also be noted that all of the affected properties also benefit from an unaffected eastern aspect onto their back gardens, so the impact, whilst noticeable, should not be severe on those residents.

22. Daylight and sunlight levels to the proposed residential accommodation within this proposal showed an exceptionally high level of achievement of the BRE standard for a higher density scheme. In particular, all applicable rooms in the proposed development would meet the Average Daylight Factor (ADF), Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH) standards recommended in the BRE Guide. All Living Rooms, Kitchens and Bedrooms are relevant when considering daylight, only Living Rooms facing within 90° of due south are considered relevant by the BRE Guide for sunlight (although they have also assessed all bedrooms facing within 90° of due south and found them to all achieve the sunlight standard for Living Rooms in the BRE Guide). The only concern noted is that some deeper plan rooms, five in total, fail to achieve the optional additional Room Depth Test in the BRE Guide, which would indicate whilst the room as a whole gets more than enough daylight, the end furthest away from the window(s) might not, but this test is just for further information, and not a recommended daylight assessment in the BRE Guide or our policy.

23. In the case of higher density developments, it should be noted that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London, the Mayor of London's Housing SPG acknowledges. In particular, the 27% VSC 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. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Therefore, full or near full compliance with the BRE Guide is not to be expected.

Conclusions

24. This proposal is a well-designed redevelopment that will complete the transformation of an allocated site that will secure continued vibrant employment whilst improving the local environment. The urban form, bulk, massing and pattern of streets, paths and blocks will help give greater definition to the local street network and support with improved sense of enclosure to the new proposed park. The proposals will provide employment space and high-quality housing, whilst improving the transition from residential to workspace uses from the abrupt sudden transition at present to a more gradual transition. The proposals will be of elegant, contemporary and polite appearance, of compatible form and height to the

	context.	
Housing Development	<p>Affordable Housing Provision</p> <p>1.1 The proposed development seeks to provide 37.7% affordable housing units by habitable rooms and as such does not accord with Haringey's 'Strategic Policies' which states that the Council will seek 'to maximise the provision of affordable housing by requiring all development capable of providing 10 units or more residential units to provide affordable housing to meet an overall borough target of 40% by habitable rooms.'</p> <p>1.2 The scheme is below our desired affordable housing requirement, however an offer of 19 Intermediate units and 8 socials rented is acceptable.</p> <p>3. Consultation</p> <p>3.1 There has been a series of pre-application meetings with the applicant and the Council's Planners.</p> <p>The applicant has proposed 19 affordable housing units consisting of 11 intermediate housing, mix 2x1B, 7x2B & 2x3B and 8 social rented 2x1B, 4x2B, 2x3bed. This is acceptable under planning policy.</p> <p>Conclusion:</p> <p>Whilst the proposed level of affordable housing below the norm accepted, it is acceptable in this instance as the development is commercial led. However, this will be subject to a financial viability appraisal and on condition the affordable housing units meets the Council preference for low cost rented units i.e. social rented and Intermediate Housing i.e. London Living Rent without the sale element. (See attached revised appendix 1 on affordable housing).</p> <p>The Council will seek to secure first refusal on the purchase of the affordable housing units secured through the S106 agreement.</p> <p>The scheme in its current form complies with the Council's Strategic Policies, principally on the grounds that it promotes the area's regeneration and has a strategic role to play in the growth of Haringey. The Council aspirations for this site are for a commercial-led mixed used development – Current AAP4, SP1 and SP2 policies</p> <p>The Housing & Growth Team supports this scheme as outlined above and will have continuous engagement with applicant to ensure the Council's aims and objectives are met.</p>	Noted. Amended plans have retained affordable housing percentage.
Regeneration	No objection.	Noted.
Waste Management	The above planning application has been given a RAG traffic light status of GREEN for waste storage and collection – amended plans	Noted.
Conservation	There are no heritage assets on or adjacent to this site. The closest is The Seven Sisters/Page Green Conservation Area, which is to the north east of the site. The scale of the proposed development is such that it won't be visible from the conservation area, and the design is appropriate for the context and would complement the surrounding pattern of development reasonably well. I can't identify any adverse heritage impacts and there is no objection from me.	Noted.
Environmental Services - Pollution	<p>Air Quality</p> <p>The London Plan, Policy 7.14 states that new development should: 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 used by large numbers of those particularly vulnerable to poor air quality, such as</p>	<p>Noted.</p> <p>Appropriate conditions will be attached to the planning consent.</p>

children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans

- 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.

An air quality assessment 19 Bernard Road Haringey Produced by XCO2 dated April 2019 has submitted with this application.

With the exception of disabled provision, the proposed development be car free, therefore the impact of operational traffic on air quality has been scoped out of the assessment.

Heat and water will be supplied to the proposed dwellings by a Regulatory Services low-NOx CHP plant, which will be compliant with the emission limits specified in the Sustainable Design and Construction SPG.

It is still unknown if an assessment has been undertaken to determine whether the building-related emissions will be air quality neutral, in accordance with the London Plan.

CHP is proposed with this planning application; a condition with respect to emissions from CHP is therefore required.

Is there are chimneys / flues associated with this proposed development, a chimney height calculation or emissions dispersal assessment will be required.

The development will be car free, except for the provision of disabled car parking spaces.

Contamination

A Preliminary Investigation Report Reference: 17499/PIR by Soils Limited, dated March 2019 was submitted with the application.

During the site walkover undertaken in February 2019, observations were made in relation to current activities, evidence of historical activities, sources of potential contamination such as fuel storage tanks, oil drums and chemical storage and evidence of contamination;

Potential sources of pollution revealed by the historical map include Former "water feature" on earliest maps, on-site industrial activities / small works, railway and coal and goods depot / scrap metal depot;

The Superficial is on Secondary undifferentiated with Zone II outer protection zone located onsite. Therefore, risk to Controlled Waters need to be assessed quantitatively.

Inhalation of Vapour/gases (including Radon) by end users was not considered as potential pathways.

I recommend the following conditions:

	<p>Air Quality Assessment A complete and final version of the submitted air quality assessment including an Air Quality Neutral Assessment, taking into account emissions from boilers and combustion plant and road transport sources must be undertaken and submitted for approval.</p> <p>Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction</p> <p>Combustion and Energy Plant: Prior to installation details of the gas boilers to be provided for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh (0%).</p> <p>Reason: As required by The London Plan Policy 7.14.</p> <p>Prior to construction of the development details of all the chimney height calculations, diameters and locations must be submitted for approval by the LPA.</p> <p>Reason: To protect local air quality and ensure effective dispersal of emissions.</p> <p>Prior to commencement of the development, details of the CHP must be submitted to evidence that the unit to be installed complies with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for Band B. A CHP Information form must be submitted to and approved by the LPA.</p> <p>Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design</p>	
Carbon Management	No objection to revised Energy Plan.	Noted.
Environmental Services - Noise	<p>I have reviewed the documents submitted in respect of the above and have no objections in principle to the development proposed. I accept the key conclusions of the report as outlined in the design statement and the acoustic assessment, especially in respect of the estimated low risk of adverse noise effects on occupants from external noise sources. I also accept the findings of the assessment of the required facade sound insulation to commercial elements of the scheme. Limits for noise egress associated with operation of the proposed development have also been established, in line with the local authority's standard requirements. All plant will need to be designed such that noise egress is in line with these limits.</p> <p>Noise associated with the operation of the proposed development will need to be controlled in line with the criteria set out within Section 6.2.3 of the report. This is likely to require acoustic attenuation to the proposed plant items which are understood to include:</p> <ul style="list-style-type: none"> - Mechanical ventilation plant serving the commercial units - Mechanical cooling plant serving the commercial units - - Mechanical ventilation plant serving the common areas of the residential units (egg lobby vent fans located at roof level). <p>Recommendations I have no objections to the development proposed on the proviso the following conditions are attached to any permission granted: Construction Method Statement</p>	<p>Noted.</p> <p>Appropriate conditions as recommended will be attached to any planning consent.</p>

No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:

- i. the parking of vehicles of site operatives and visitors;
- ii. details of access to the site;
- iii. loading and unloading and the storage of plant and materials used in constructing the development;
- iv. the erection and maintenance of security hoardings including decorative displays;
- v. wheel washing facilities;
- vi. measures to control the emission of noise, dust and dirt during construction;
- vii. a scheme for recycling/disposing of waste resulting from demolition and construction works; and
- viii. details of a nominated developer/resident liaison representative with an address and contact telephone number to be circulated to those residents consulted on the application by the developer's representatives. This person will act as first point of contact for residents who have any problems or questions related to the ongoing development.

Reason: In order to reduce the environmental impact of the construction and the impact on the amenities of neighbouring residents

Construction Hours

No deliveries, external running of plant and equipment or construction works, other than internal works not audible outside the site boundary, shall take place on the site other than between the hours of

0800 to 1800 on Monday to Friday,
0800 to 1300 on Saturday, and
not at all on Sundays, Public or Bank Holidays without the prior written permission of the Local Planning Authority.

Reason: To ensure that the proposed construction work does not cause undue nuisance and disturbance to neighbouring properties at unreasonable hours

Sound Insulation

The use shall not be commenced until sound insulation measures have been carried out within the premises in accordance with details which have been submitted to and approved in writing by the Local Planning Authority. Such details shall include the proposed internal layout of the premises.

Reason: To minimise the transmission of noise, vibration and any other potential nuisance from the commercial elements of the development and thereby safeguard the future amenity of neighbouring residential occupiers

Sound Insulation

The scheme of sound insulation for the external windows shall be implemented prior to the occupation of the development and thereafter permanently retained.

Reason: To maintain reasonable levels of protection for the occupiers of the development from external noise

Extract Ventilation

The use hereby permitted shall not be commenced until details of the extract ventilation system and odour control equipment, including details of

	<p>any external ducting and measures to control noise and vibration, have been submitted to and approved in writing by the Local Planning Authority and the equipment so approved has been installed. Such approved equipment shall thereafter be operated at all times when cooking is carried out and maintained in accordance with the manufacturer's instructions.</p> <p>Reason: To safeguard the appearance of the premises and minimise the impact of potential nuisance odour from the commercial development upon the adjacent residential properties.</p>	
External:		
Transport for London (TfL)	Considering the scale, nature and location of the proposal TfL has no comments.	Noted.
Environment Agency	<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 in addition 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 guidance (previously covered by the GP3) and CLR11 (Model Procedures for the Management of Land Contamination).</p> <p>In order to protect groundwater quality from further deterioration:</p> <ul style="list-style-type: none"> <input type="checkbox"/> No infiltration-based sustainable drainage systems should be constructed on land affected by contamination, as contaminants can remobilise and cause groundwater pollution. <input type="checkbox"/> Piling, or any other foundation designs using penetrative methods, should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution. <input type="checkbox"/> Decommissioning of investigative boreholes to ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies, in line with paragraph 170 of the National Planning Policy Framework. <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> <p>From www.gov.uk:</p> <ul style="list-style-type: none"> - The Environment Agency's approach to groundwater protection (2017) - 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 - Use MCERTS accredited methods for testing contaminated soils at the site <p>From the National Planning Practice Guidance:</p> <ul style="list-style-type: none"> - Land affected by contamination <p>British Standards when investigating potentially contaminated sites and</p>	<p>Noted.</p> <p>Appropriate planning conditions will be attached to any planning consent.</p>

	<p>groundwater:</p> <ul style="list-style-type: none"> - BS 5930:2015 Code of practice for site investigations; - BS 10175:2011+A2:2017 Code of practice for investigation of potentially contaminated sites - BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points - BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns and groundwater quality.) <p>All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. 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>You may wish to consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed.</p>	
<p>Metropolitan Police (Crime Prevention)</p>	<p>Section 1 - Introduction:</p> <p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference the above application we have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations.</p> <p>These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>We met with the project Architects to discuss Crime Prevention or Secured by Design (SBD) for the overall site. The Architects have not created a Design and Access Statement at that stage as they are currently at pre-planning application stage. They have also stated that "should it be required, further consultation will take place during the detailed design stage". At this point it can be difficult to design out any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.</p> <p>Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can be easily mitigated early if the Architects or Managing Agency was to discuss this project prior to commencement, throughout its build and by following the advice given. This can be achieved by the below Secured by Design conditions being applied (Section 2).</p> <p>If the Conditions are applied, we request the completion of the relevant</p>	<p>Noted.</p> <p>The appropriate conditions and informatives will be attached to any planning consent.</p>

	<p>SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p>Section 2 - Secured by Design Conditions and Informative:</p> <p>In light of the information provided, we request the following Conditions and Informative:</p> <p>Conditions:</p> <p>(1) Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained.</p> <p>(2) Accreditation must be achieved according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development.</p> <p>Informative:</p> <p>The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p> <p>Section 3 - Conclusion:</p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p> <p>Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.</p>	
<p>Transport for London</p>	<p>Thank you for consulting TfL Spatial Planning on the above application.</p> <p>1. TfL notes that the applicant has Noise Report to accompany this planning application. The report identified the nearby railway lines as a potential source of noise, however concluded that the greatest anticipated external noise level for the site during early evenings will be when employees leave the commercial estate. No special acoustic measures are proposed for the flats. Railways may operate 24 hours a day, even if there are no passenger services. Therefore, in line with Policy D12 of the draft London Plan, developments should be designed to mitigate against existing noisy uses. As long as this policy has been complied to, and the application been properly assessed against this policy TfL have no objections.</p> <p>2. The site is located within an area of PTAL 6a (on a scale of 0-6b, where 6b is the highest).</p> <p>3. With the exception of disabled parking, no car parking spaces are proposed. This is welcomed.</p> <p>Cycle Parking</p> <p>4. 89 long-stay cycle parking spaces are proposed for the residential element. In line with the draft London Plan 97 long-stay and 2 short-stay cycle parking spaces should be provided.</p> <p>5. For the commercial element of the scheme, 2 long-stay cycle parking</p>	<p>Noted.</p> <p>The railway is at least 100m away from the site. The Noise report prepared by the applicant considered the noise impact from the railway and concluded that this wasn't significant. Traffic on local roads was identified as a more dominant noise source.</p> <p>The Council's Environmental Health Officer – Noise has assessed the application and considers that the proposals are acceptable subject to</p>

	<p>space and 1 short-stay cycle parking spaces should be provided.</p> <p>6.All cycle parking spaces should be designed in accordance with the draft London Plan standards and secured through condition.</p> <p>Car Parking</p> <p>7.Four disabled parking spaces are proposed. This equates to 7.5 per cent of dwellings having access to a disabled persons parking bay from the outset. In order to comply with draft London Plan policy T6.1, the applicant should demonstrate how one further disabled persons parking space can be provided in the future upon request. One disabled parking space should be provided for the commercial element of the site.</p> <p>8.It is understood that the four disabled parking spaces are to be provided within the adopted highway. In line with the Healthy Streets approach, which seeks to reduce car dominance within London’s streets, the applicant should consider whether it is possible to locate disabled parking provision within the site boundary.</p> <p>9.Electric vehicle charging points should be provided for the four proposed disabled parking bays.</p> <p>10.It is noted that delivery and servicing of the development will take place on-street, on the link road between Bernard Road and Norman Road. The routing of the delivery and servicing vehicles, in particular whether they would be reversing onto the site or access the site through adjoining development. In line with Vision Zero, reversing on to the site should be resisted. Clarification on the route that Delivery and Servicing vehicles will take should be clarified.</p>	<p>safeguarding conditions.</p> <p>The proposed development is compliant with the current London Plan.</p> <p>The Council’s Transport Officer is satisfied with the proposed cycle parking and car parking arrangements.</p>
<p>Thames Water</p>	<p>Waste Comments</p> <p>With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services</p> <p>As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed online via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p> <p>There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize</p>	<p>Noted.</p> <p>Appropriate conditions will be attached to any planning consent.</p>

the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation.

Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement."

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

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

There are water mains crossing or close to your development. Thames

	<p>Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes</p> <p>If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>	
<p>London Fire Brigade</p>	<p>The Brigade has been consulted with regard to the above-mentioned premises and makes the following observations:</p> <p>The Brigade is satisfied with the proposals.</p> <p>This Authority strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers, and can reduce the risk to life. The Brigade opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupier. Please note that it is our policy to regularly advise our elected Members about how many cases there have been where we have recommended sprinklers and what the outcomes of those recommendations were. These quarterly reports to our Members are public documents which are available on our website.</p> <p>Any queries regarding this letter should be addressed to the person named below. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.</p>	<p>Noted.</p> <p>An informative will be attached to any planning consent.</p>