

Council Comment	Applicant Response	Maurice Comments 05/09/23
<i>Cycle Parking: Please clarify how existing cycle parking provision would accommodate demand for scooters, buggies etc. associated with Nurseries / creche type uses and how would such provision including short-stay cycle parking be secured for the worst case Class E permitted use, at each unit.</i>	The separate application for a change of use at one of the consented B1 units to a nursery will make suitable provision for scooters / buggies etc, as agreed with LB Haringey. Under the Class E change of use application, although theoretically possible it is considered extremely unlikely that there would be sufficient demand in the local area for two nursery / creche facilities immediately adjacent to each other and therefore it is not considered appropriate or necessary to make additional provision for buggies / scooters. Further, as none of the other units have access to outdoor space, then a nursery operator would not actually even be able to operate without this.	The applicant has not provided the required information whilst the response states it is unlikely it does not rule this out. 1) The applicant will therefore need to provide the information requested, what are the likely uses within the class and how scoter/ buggy/cycle parking will be provided. 2) If the application is unable to comply with the London Plan requirements the application should be refused, or the use limited within the Class to ensure it complies with London Plan Policy T5 Cycling. Restrict the use to what has been assessed.
<i>Disabled User Car Parking: The response indicates that provision for three disabled user parking space would exceed London Plan Standards. This is not accepted because the reference to a minimum of one Blue Badge parking in the London Plan is intended for rounding up, in cases where the application of parking standards results in a requirement for less than one space.</i> <i>London Plan -10.6.12: In implementing this policy, if three per cent of a scheme is less than one space, this should be rounded up to one.</i>	These comments are noted and it is confirmed that two 'Blue Badge' parking spaces will be provided for the Class E use which will be achieved by converting 3 standard parking spaces (No. 7-9)	Point addressed no further action required.

<i>In addition, London Plan standards includes a qualification as below:</i> <i>London Plan - 10.6.23: Standards for non-residential disabled persons parking are based on a percentage of the total number of parking bays. Careful assessment will therefore be needed to ensure that these percentages make adequate provision in light of the need for disabled persons parking bays by Blue Badge holders.</i> <i>Given that each unit could be occupied by a separate tenant or that a single occupier could employ / attract a large number of people, it is inappropriate to simply consider that London Plan requirement would be satisfied by provision of one blue badge parking space.</i> <i>The proposal for reallocation of one of the residential 'blue badge' space for commercial is inappropriate. However, the proposals to convert 3 standard parking spaces (No. 7-9) into two 'Blue Badge' parking space (as illustrated at Appendix D) and allocated for the commercial units, is considered to be an acceptable compromise and improvement.</i>		
<i>Servicing and Delivery: Please clarify what assessment of servicing and delivery demands associated with permitted uses (worst case) within Class E, has been</i>	The Planning Statement submitted in support of the Class E change of use application outlines the range of potential uses that are realistic for the site given its location. A copy of	Point addressed no further action required.

undertaken. Has the requirement to restrict delivery and servicing times to avoid conflicts with Nursery drop-off and pick-up times been considered?

this is already on your file and this suggests that the proposed uses under this class are not anticipated to generate a greater demand for and frequency of deliveries when compared with the consented B1 use. The PTP Technical Note 21354/01 previously submitted outlined how suitable and robust management measures are already in place via the approved Delivery and Service Plan to ensure that the timing of deliveries can be effectively managed and controlled to spread the demand throughout the day and avoid any congestion within the service area / turning head at Cross Lane. In relation to the potential conflicts with the Nursery application, this will be a car free development as required by LB Haringey with parents and staff encouraged by the nursery to travel on foot any by public transport. As outlined within the PTP Transport Statement submitted with the Nursery application, it is anticipated that any parents dropping off by car will use the nearby Sainsbury's car park which has far greater ease of access than Cross Lane, which will limit any potential for conflicts in relation to the Class E application deliveries and the nursery. The nursery will also have limited deliveries with one weekly supermarket shop and occasional daily deliveries using small vans. The potential conflicts between delivery vehicles and parents dropping of children on foot has been addressed by the provision of a specific turning head and service bay available for the Class E use which can accommodate the largest vehicles anticipated. Wide footways are also provided

	on both sides of Cross Lane at the nursery site that safely segregate pedestrians from traffic. For these reasons it is not considered necessary to restrict delivery and servicing.	
<i>Cumulative Impacts: Please clarify what assessment of the cumulative trip generation, mode shares and parking assessment has been undertaken for the permitted uses (worst case) within Class E.</i>	It was clearly agreed by the LB Haringey Officers at our meeting with Valerie Okeiyi and Shreekant Patel on the 27 th June 2023 that the funding of a car club contract for each of the three units subject to the change of use application would be sufficient mitigation to address the issue of cumulative impact. This being the case it was also agreed that an assessment of the cumulative impacts would therefore not be required. Could officers please confirm that this remains the case and if not then why that agreed position has changed?	No further action required, to be monitored as part of the travel.
<i>Travel Plan: Please confirm how the different operational characteristics of uses / occupiers permitted within Class E will be reflected within the travel plan aims, objectives, action plan, monitoring and targets.</i>	As outlined within the PTP Technical Note previously submitted the Class B1 units subject to the proposed change of use form part of a mixed-use development with a residential element. The approved Travel Plan for the development as a whole includes separate bespoke objectives and targets for the residential and commercial elements. As LB Haringey officers will be aware it is not TfL guidance or best practice to require separate aims, objectives, action plan or monitoring / targets for separate occupiers within an overall commercial use. This would be impractical to implement or enforce in any event. An extract from the approved site Travel Plan is attached which sets out the commercial use aims and	Agreed this can be addressed by way of the S106 obligation for the site in relation to the Travel Plan monitoring, which will need to reflect the occupation and uses of the units. Point addressed not further action required. Double check the S.106 agreement.

	targets which are considered to remain appropriate for a Class E use.	
<i>The reference to discussion and agreement regarding 'car sharing' to mitigate the cumulative impacts of the commercial units requires further clarification. It was not clear how the cumulative impact was assessed and what scenarios were considered</i>	As discussed at item d) above it was clearly agreed with LB Haringey officers that a cumulative impact assessment was not necessary with the funding of car club contracts providing sufficient mitigation. Could officers please confirm that this remains the case?	