Kodi Sprott, Principal Committee Coordinator

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13 January 2025

To: All Members of the Planning Sub Committee

Dear Member,

Planning Sub Committee - Monday, 13th January, 2025

I attach a copy of the following reports for the above-mentioned meeting which were not available at the time of collation of the agenda:

9. HGY/2024/2279 25-27 CLARENDON ROAD N8 0DD (PAGES 1 - 96)

Proposal: Demolition of existing buildings and delivery of a new co-living development and affordable workspace, alongside public realm improvements, soft and hard landscaping, cycle parking, servicing and delivery details and refuse and recycling provision.

Yours sincerely

Kodi Sprott, Principal Committee Coordinator
Principal Committee Co-Ordinator

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Appendix 3 - Consultation Responses - internal and external consultees

Stakeholder	Question/Comment	Response
INTERNAL		
Transport	**Transportation Planning Comments** **HGY/2024/2279, 25-27 Clarendon Road Off Hornsey Park Road, Wood Green, London, N8 0DD** **Date:** 23/12/2024 **Proposal:** Demolition of existing buildings and delivery of a new co-living development and affordable workspace, alongside public realm improvements, soft and hard landscaping, cycle parking, servicing and delivery details and refuse and recycling provision. **Description** An application has been received seeking planning permission to demolish the existing building and erect a new shared living development, with affordable workspaces, commercial floorspace. The proposal will also include public realm improvements, soft and hard landscaping, cycle parking. Residents will have access to on-site facilities such as a gym and dinning. The development site currently contains a vehicle access that leads to a car park which will not be retained for this scheme. The site is currently used as offices (Class B1) and for purposes of distribution (Class B8). The vehicles access allows for current servicing to be done on-site rather than utilising onstreet parking bays. The proposal would have cycle provision for 167 long-stay and no short-stay parking for the co-living accommodation, the commercial space will have 2 long-stay and 1 short-stay cycle space. The proposal includes a single disabled bay to be provided on the adopted highway, but off-street.	Observations have been taken into account. The Recommended legal agreement clauses and conditions will be included in line with the planning obligations SPD.

	The proposal site has a PTAL rating of 4 indicating that its access to public transport is excellent when compared to London as a whole suggesting that there are opportunities for trips to be made to and from the site by modes other than the private car. The site is located within the Wood green Inner CPZ which restricts parking to permit holders Monday to Sunday 08:00 – 22:00. The proposal site fronts onto Clarendon Road, which is an adopted highway with a speed limit of 20 mph and has a width of around 8m, the width decreases to c5.8m with on-street parking. The site is located on a bend in the road. The development is located near to Wood Green Town Centre providing future residents with convenient access to shops, services, and transport links. One of the nearest stations is Hornsey National Rail Station which is around a 9min walk and a c.5min bike ride. As part of Haringey Heartlands bus route extensions, the 91 and the N91 are meant to be extended to Wood Green to provide new residents of the heartlands better public transport connectivity. Nearby high frequency bus services can be reached from Turnpike Lane. **Unit mix** Proposed: 222 x co-living bedrooms Commercial floorspace: Proposed: 231 sqm **Trip generation** Trip information has been provided which utilises data from survey sites from the TRICS database, 4 surveyed sites were used to display the exiting trips for the current office and distribution uses. For the co-living space only one site existed which was a site called the Collective located in Old Oak Common compromising 544 units which did not provide any parking. Mode share data has been used to determine the usage levels for all modes of transport, though these have been manually adjusted to reflect the low car usage of the site. It should be highlighted that this data has been sourced from the 2011 Census data, which tends to be used given the 2021 Census was conducted during Covid 19 when lockdowns were still taking place, although the 2011 census data is still more than a decade and thus the difference in travel behaviour would have changed since. For purposes of simplicity the total proposed two-trips for the co-living space and commercial unit as follows based on highest first:	

	• 502 public transport trips • 84 walking trips • 25 cycle trips • 23 car trips The Transport Assessment predict over a 12-hour period that 578 two-way person trips will be created by this site. Given that the area/environment is currently lacking in road safety and accessibility for pedestrians LBH Transport Planning will require the developer to enter a s278 agreement to enable improvements to the public realm and to improve road safety for pedestrians at this location given the new high numbers of walking trips generated by the development proposal which will have to be accommodated onto the local highways network. **Car Parking** Planning policy requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan 2021 Policy T6.1 Residential Parking requires that development proposals must comply with the relevant parking standards. For a development of this type, 222 x single bedrooms with a PTAL rating of 4. Maximum parking standards apply which limits the number of car parking spaces that can be provided for a development of this nature which has a moderately good PTAL. Given the PTAL of the site and its proximity to public transport links the development will be designated as car free/car capped to be in accordance with Haringey's Development Management DPD, Policy DM32 which states the council will support proposals for new developments with limited or no on-site parking, where: • There are alternative and accessible means of transport available. • Public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index. • A Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development. • Parking is provided for wheelchair accessible units. The published London Plan 2021 T6.1 Residential Parking states that disabled person's parking should be provided for new residential developments delivering 10 or more units. As a minimum 3% of dwellings must have at least 1 designated disabled persons parking bay from the outset.	

	This Policy further requires that new developments be able to demonstrate as part of a Parking Design and Management Plan, how an additional 7% of dwellings could be provided with 1 designated disabled person's parking space per dwelling in future upon request as soon as the existing provision is insufficient. As part of our ongoing effort to ensure that this policy can be complied with and applied effectively throughout the borough LBH Transport Planning has had further discussion with the applicant/developer for the installation of an off-street layby similarly to the ones found further north of the site on Mary Neuner Road. The site would include workspace/commercial floorspace with an area of 231 sqm, though the number of potential employees is not known. To be in accordance with the published London Plan 2021 Policy T6.5 Non-residential disabled person parking, which states that *'all proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided'*. Consequently, given the relatively small size of the commercial unit and its possible uses it is felt in this instance it would not be enough to generate demand for a dedicated disabled bay. Although, anyone with a blue badge will be able to use the general disabled bay that would be provided on Clarendon Road as part of this scheme. LBH Transport Planning will require the developer/applicant to enter into a s278 agreement with the council for the provision of this on-street disabled bay. **Future parking demands** A parking stress survey was conducted, which utilised the Lambeth Methodology covering an area of 200m, given the commercial the use of the proposal a 500m survey area was recommended within pre—application discussion. Surveys were conducted over two nights utilizing car lengths of only 5m. However, LBH Transport Planning recommended for lengths of 5.5m – 6m given the abundance of larger vehicle types in use on residential streets. 4 residential streets were covered within the survey that demonstrated on-street parking stress was between 88% - 90%, this was above the threshold of 85%, this means that these streets would not have sufficient capacity to absorb any more demand generated by the development proposal. This would not be in Accordance with the published London Plan 2021 Policy T2 Healthy Streets states that '*development proposals should reduce the dominance of vehicles on London's streets whether stationary or moving* '.	

We will therefore be seeking a contribution towards parking management measures to ensure that those areas outside of the Wood Green Inner control parking zone do not suffer from any displacement in parking demand generated by the proposal.

Cycle Parking

The sites total proposed cycle parking for both elements of the site were assessed against the published London Plan 2021 Policy T5 Cycle parking standards for compliance. Policy T5 Cycle requires that developments 'provide the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located and be in accordance with the minimum standards. Further guidance has been created and published by the Graeter London Authority on Large-scale purpose-built shared living developments in 2024. It provides some recommendations on cycle parking with 0.75 per bedroom needing to be provided, though this is stated as being a bench marking in regard to the long stay. Notwithstanding there is no short-stay cycle parking recommendation to be found within the same document. The co-living space is proposed to have 167 long-stay spaces and no short-stay, the commercial will be provided with 2 long-stay and 1 short-stay. With regards to the commercial units the developer/applicant has used Use Class B1 Business offices which requires 1 space per 150 for long-stay and 1 space per 500 sqm. Given the sites proximity to Wood Green Town Centre and Haringey Heartlands the higher standards of cycle parking will be sort. The applicant will be required to provide 167 long-stay cycle parking spaces for residents and for the commercial unit 3 long-stay and 1 short-stay cycle spaces.

The location and some details on the design of the cycle parking has been given. All the cycle parking will be located within the same area for both the long and short stay. Cycle parking will utilise the following:

- 118 two-tier racks
- 26 Sheffield stands
- 7 enlarged adaptive spaces to mee the LCDS 5% requirement
- 18 Brompton bike lockers
- 1 Sheffield stand for the short-stay parking

	LBH Transport Planning has received detailed plans which can be compared against the LCDS, this will be secured via a planning condition. The short-stay cycle must be provided outside of the building but within the curtilage of the site as by definition the long-stay must be secure, and visitors should not be able to gain entry to the bike stores. The 18 Brompton bike lockers do not provide enough variety or flexibility of use given that they can only be used for the storage of Brompton bikes. Details relating to the bike store will be secured by a pre-commencement planning condition requiring the applicant to submit details and plans of cycle parking spaces in line with the London Plan 2021 Policy T5 Cycle and Transport for London's London Cycle Design Standards (LCDS) which must be submitted and approved before development commences on-site. **Highway Works** Some highway works have been proposed as the development as previously mentioned above a layby will need to be provided which will be off from the highway similarly to others that have been installed north of the site. This bay will be at a minimum 12m in length, it will provide a single disabled bay, and a general residential parking space supported with an electric vehicle charging point. The footway will be pushed back onto the applicant's land. Because the footway will need to be recessed with the applicants red line boundary, they have agreed with LBH Transport Planning for the new footway to be adopted by the Council under a S.38 agreement. LBH, Transport Planning would require a stage 1 and 2 Road Safety Audit to be completed during the design stage of any potential S.278 works. These works would be subject to further detailed design and approval and will have to be secured as part of a S.38 and S.278 agreement between the Council and applicant. **Car Clubs** The closest car club bay is located on Maru Neuner Road which is approximately a 3min walk from the development site. Given the scale of this proposal for 222 single bedrooms LBH Transport Planning will require that £100 in credit is provided to each resident. This is to ensure that the site is being sufficiently supported to maximise its potential to increase uses of sustainable transport and deter the use of the private car usage. Additionally, this will assist with reducing the rate of car ownership by residents of this development and help to offset any	

	potential future car parking demands on local residential streets when the CPZ is not in operation as demonstrated by the parking survey there is not sufficient on-street capacity to absorb any demand. The applicant will also be required to provide 2 years of car club membership for each residential unit, along with £100 driving credit for each resident this will be secured via S.106 obligation. Full details on the car club provision must be submitted to the local authority for approval at least 6 months before the development is occupied as part of the travel plan. **Access** An Active Travel Zone (ATZ) has been produced and submitted as part of the Transport Statement. 4 walking routes to key destinations were analysed and assessed against the Healthy Streets indicators. These routes were: • Route 1: Site to/from Hornsey Rail Station. • Route 2: Site to/from Turnpike Lane Underground Station/Bus Station • Route 3: Site to/from the Mall Wood Green. • Route 4: Site to/from Sainsburys A504 High Street. • Route 5: Site to/from Alexandra Park Cricket and Football Fields Some of the recommendations for improvements to these routes include the • Hornsey Rail Station - installation of tactile/materials changes to improve accessibility, and more dedicated cycle lanes • Turnpike lane Underground Station/Bus station – installation of a cycle route along turnpike lane. The Mall Wodd Gren – provision of wider footways around Hornsey Park Road • Sainsburys A504 High Street – widening of footways and the introduction of a pedestrian crossing on the High Street • Alexandra Park Cricket and Football Fields – better separation between pedestrians and cyclists in shared spaces LBH Transport Planning have examined collision data from Transport for London's (TfL) Road Danger dashboard. Data has been sourced for pedestrians and cyclists for a 5-year period from until May 2024. Within that period no major clusters emerge within the immediate vicinity of the	

	site. A small cluster of 3 slight collisions can be seen at the Turnpike Lane junction with Hornsey Park Road and Wightman Road. 1 slight collision has been reported further north from the site on Western Road. Mayes Road has a cluster which includes 2 serious and 2 slight. The developer has not provided any improvements to address any known road collisions. **Service and Delivery.** A draft service and delivery plan has been received as part of the application. All deliveries are proposed to take place on the highway, there are no current loading bays locate near to the site. overall, some information has been provided within submitted documents regarding trip information sourced from TRICS survey data. It has been demonstrated that existing daily two-trips are around 10 HGV a day. The proposal could generate around 12 trips associated with the co-living space; these deliveries would more than likely be undertaken via a transit van. The site could see a high number of deliveries undertaken by bike or moped to fulfil either takeaway or online deliveries. The commercial is only expected to generate 1 trip per day. Vehicles servicing the site are expected to utilise existing on-street parking bays located near to the site. Refuse collections are proposed to take place the same way that they are currently. A 10.2m refuse vehicles will pull alongside the kerb on Clarendon Road and the council operatives will collect the bins from the stores which can be accessed from the footway. It is currently envisaged that the council will make collection from the site rather than a private refuse company. Most of the bins will be 1,100 litre euro bins. The above issues can be addressed via the submission of a service and delivery plan to manage deliveries accessing the site and to limit the number of trips to the site to manage the impact on the highway network. **Travel Plan** A draft Travel Plan has been received which seems to solely cover the co-living segment of the proposal, with nothing included for the commercial floorspace. Some mode share data has been given which has been interpreted from the TRICS survey site to form the baseline year data for the site's residents. However, unfortunately this has not been applied to the single action to demonstrate how certain mode shared can be increased during years 3 and 5. Understandably this is a draft document, though this exercise would be easy to undertake for this submission. As the site will see a high number of residents due to its 222 single bedroom capacity and	

	commercial floorspace it has not been fully denoted how the site will support active travel and public transport modes. Overall, LBH Transport Planning finds the currently drafted travel plan to be lacking in effective measures and coverage of the proposal's entire uses. Therefore, a Travel Plan Monitoring Fee per year for the first 5 years will be sought separately for the commercial and co-living residents. Additionally separate travel plans will need to be submitted for each use. The above will be secured and covered as of a S.106 obligation. **Construction and logistics** A draft construction logistics plan has been developed and submitted as part of the application. It sets out the principles of how the development will be built including: programme of works, vehicle routing/access, trip generation, monitoring, and existing site conditions, and demolition works. Some vehicle types have been provided, the largest would be a 10.2m tipper lorry used for the purposes of delivering materials and the smallest vehicle would be a 5.3m transit van. A staff travel plan will be created, there will need to be effective monitoring to ensure that no worker is travelling by car to the site and parking locally. Some estimated trip information has been given which shows peak vehicle movements to/from the site will be as high as 10 per hour in worst case scenario, though it is difficult to understand the overall context of this given that no further trip information has been presented within a table for the entirety of the lifespan of the works. Information has been presented on possible uses of the highway for deliveries on Clarendon Road with 25m of the highway being proposed to be used for deliveries, this arrangement would woefully be unacceptable given the proposal for the 91-bus route extension, one side of the highway would be severely limited in width, and the fact that the site is located on a bend in the road. Barriers are also proposed to block access to the footway for pedestrians whilst deliveries are being made, this would create unsafe condition for pedestrians as there are no nearby safe crossing facilities for them. The above mentioned would increase road danger during construction as it could lead to a higher risk of collisions on Clarendon, this would not be in accordance with the London Plan 2021 Policy T7 Deliveries, servicing and construction states during '*the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times*.'	

	Any parking restrictions or closure of the footways required will need licenses that the developer/applicant will need to apply from the council and will need agreement on how these will be undertaken by council. Finally, before construction has begun a general highway survey will need to be carried at to ascertain the condition of the footway and highway and to determine if vehicle accesses will need to be reinforced. A fully detailed draft of a worked-up Construction Logistics Plan will be required for review and approval prior to commencement of any site works. The applicant will need to liaise and discuss intended means of access and servicing the site from the Highway with Haringey Council's Network Management and Transport Planning teams. The outcomes of these conversations will need to inform the finished CLP. A CLP should include the following: • High provision of cycle parking for workers for all phases of construction to promote uptake of cycling to/from the site. • Givens the sites excellent connectivity to public transport which is demonstrated through its close proximity to public transport, and local parking restrictions no on-site car parking should be provided for workers • The following times, 08:00-09:00, 15:00-16:00, and 17:00-18:00, will need to be avoided by delivery and construction vehicles as to prevent vehicles from related to the development travelling when the road network is at its busiest because of school dop-off/pick-up times and peak road congestion • Effort should be made to have a process in place to deal with delivery/construction vehicles that turn up late or announced, as to prevent vehicles waiting on the public highway causing an obstruction or waiting on nearby residential streets given the sites location. LBH Transport Planning would require that a Construction Logistics Plan (CLP) be submitted by the developer/applicant, this can be secured via a S.106 obligation. The developer/applicant will need to adhere to Transport for London's CLP guidance when compiling the document, construction activity should also be planned to avoid the critical school drop off and collection periods, the applicant will be required to pay a construction travel plan contribution of fifteen thousand pounds (£15,000) for the monitoring of the site's construction activities.	

Recommendation

There are no highway objections to this proposal subject to the following conditions, S.106 and S.278 obligations.

Conditions

1. Delivery and Servicing Plan and Waste Management

The owner shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The service and delivery plan must also include a waste management plan which includes details of how refuse is to be collected from the site, the plan should be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying distance of a refuse truck on a waste collection day. It should demonstrate how the development will include the consolidation of deliveries and enable last mile delivery using cargo bikes.

Details should be provided on how deliveries can take place without impacting on the public highway, the document should be produced in line with TfL guidance.

The final DSP must be submitted at least 6 months before the site is occupied and must be reviewed annually in line with the travel plan for a period of 3 years unless otherwise agreed by the highway's authority.

Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway and to comply with the TfL DSP guidance 2020

2. Cycle Parking

The applicant will be required to submit plans showing accessible; sheltered, and secure cycle parking for 167 long-stay cycle parking spaces for residents and commercial 3 long-stay and 1 short-stay spaces for the commercial unit for approval. The quantity must be in line with the London Plan 2021 T5 Cycle and the design must be in line with the London Cycle Design

	Standard. No Development (including demolition) shall take place on site until the details have been submitted and approved in writing by the Council. REASON: to be in accordance with the published London Plan 2021 Policy T5, and London Cycle Design Standards (LCDS). **S.106 obligations** 1. <u>Car-Free Agreement</u> The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as "car free" and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose. Reason: To ensure that the development proposal is car-free, and any residual car parking demand generated by the development will not impact on existing residential amenity. 2. <u>Construction Logistics and Management Plan</u> The applicant/developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £15,000 (fifteen thousand pounds) to cover officer time required to administer and oversee the arrangements and ensure highways impacts are managed to minimise nuisance for other highways users, residents, and businesses. The plan shall include the following maters, but not limited to, and the development shall be undertaken in accordance with the details as approved: a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway. b) The estimated number and type of vehicles per day/week c) Estimates for the number and type of parking suspensions that will be required	

	d) Details of measures to protect pedestrians and other highway users from construction activities on the highway e) The undertaking of a highways condition survey before and after completion f) The implementation and use of the Construction Logistics and Community Safety (CLOCS) standard. g) The applicant will be required to contact LBH Highways to agree condition on surveys. h) Site logistics layout plan, including parking suspensions, turning movements, and closure of footways. i) Swept path drawings. Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development in combination with other sites in the Wood Green area and to encourage modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect the amenity of neighbouring properties and to maintain traffic safety. 3. <u>Car Club Membership</u> The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, including the provision of adequate car club bays and associated costs, and must include the provision of five years' free membership for all residents and £100 (one hundred pounds in credit) per year/per unit for the first 2 years. Reason: To enable residential and student occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements. 4. <u>Commercial Travel Plan</u> A commercial travel plan must be secured by the S.106 agreement and submitted 6 months before occupation. As part of the travel plan, the following measures must be included to maximise the use of public transport. a) The applicant submits a Commercial Travel Plan for the commercial aspect of the Development and appoints a travel plan coordinator who must work in collaboration with	

	the Facility Management Team to monitor the travel plan initiatives annually for a period of 5 years and must include the following measures: b) Provision of commercial induction packs containing public transport and cycling/walking information, available bus/rail/tube services, showers. Lockers, map and timetables to all new staff, travel pack to be approved by the Councils transportation planning team. c) The applicant will be required to provide, showers lockers and changing room facility for the commercial element of the development. d) The developer is required to pay a sum of £3,000 (three thousand pounds) per year per travel plan for monitoring of the travel plan for a period of 5 years. This must be secured by S.106 agreement. e) The first surveys should be completed 6 months post occupation or on 50% occupation whichever is sooner. Reason: To promote travel by sustainable modes of transport in line with the London Plan 2021 and the Council's Local Plan SP7 and the Development Management DMPD Policy DM 32. Reason: To promote travel by sustainable modes of transport in line with the London Plan 2021 and the Council's Local Plan SP7 and the Development Management DMPD Policy DM 32. 5. <u>Residential Travel Plan</u> Within six (6) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses must be submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring, and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan to maximise the use of sustainable modes of transport. a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years. b) Provision of welcome induction packs containing public transport and cycling/walking information to every new resident, along with a £200 voucher for active travel related equipment purchases.	

c) The applicant is required to pay a sum of, £3,000 (three thousand pounds) per year for a period of five years. £15,000 (fifteen thousand pounds) in total for the monitoring of the travel plan initiatives.
d) Parking management plan which monitors the provision of disabled car parking spaces for the site and triggers any necessary provision on the local highways network.

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

6. Parking management contribution

We will require a contribution of £20,000 (twenty Thousand Pounds) from the applicant to undertake a review of the current parking management measures on Lawerence Road and the surrounding road for the implementation of parking and loading measures and potential changes to the CPZ operational hours.

Reason: To implement parking management measures to mitigate the impacts of the additional car parking demand that will be generated by the development proposal on the local transport network.

7. Highway Improvements

The applicant will be required to enter into agreement with the Highway Authority under Section: 38 and 278 of the Highways Act, to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements, improved pedestrian infrastructure. The developer will be required to provide details of any temporary highways including temporary TMO's required to enable the occupation of each phase of the development, which will have to be costed and implemented independently of the main S.278 works. The works include but are not limited to:

1. New inset car parking bays with the provision of a new wheelchair accessible car parking space with electric vehicle charging facility, type of EV charge to be agreed by the highway authority

<table>
<tr><td></td><td>2. New raised enter treatment of the junction of Clarendon Road to facilitate the increase in pedestrian traffic including tactile paving.
3. New street trees and repaving of the footways fronting the site in line with the agreed pallet of material approved for Mary Neuner Road and Clarendon Road.

The scheme should be design in line with the ‘Healthy Streets’ indicators perspective, full list of requirements to be agreed with the Highways Authority. The applicant will be required to submit detailed drawings and a Stage 1, and 2 road safety audit of the highways works for all elements of the scheme including the details of the footpath, these drawings should be submitted for approval before any development commences on site.

Reason: to improve accessibility to the site by foot and to ensure that the site is in accordance with the London Plan 2021 Policy T2 Healthy Streets a to implement highway works to facilitate future access to the development site.</td><td></td></tr>
<tr><td>Carbon Management Team</td><td>
<table>
<tr><td colspan="2"></td><td>Our ref: HGY/2024/2279
Contact: Valerie Okeiyi

Date: 20/11/2024</td></tr>
<tr><td colspan="3">Town and Country Act 1990 (As amended)</td></tr>
<tr><td>Location:</td><td colspan="2">25-27 Clarendon Road Off Hornsey Park Road, Wood Green, London, N8 0DD</td></tr>
<tr><td>Proposal:</td><td colspan="2">Demolition of existing buildings and delivery of a new co-living development and affordable workspace, alongside public realm improvements, soft and hard landscaping, cycle parking, servicing and delivery details and refuse and recycling provision.</td></tr>
</table>

Carbon Management Response 05/11/2024

In preparing this consultation response, we have reviewed:
• Energy & Sustainability Statement prepared by Integration (dated 26 July 2023)
• Overheating Analysis prepared by Integration (dated 26 July 2023)</td><td>Comments noted. Conditions and legal agreement Clauses included.</td></tr>
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	• Relevant supporting documents. **1. Summary** The development achieves a reduction of 56.1% carbon dioxide emissions on site with communal air source heat pump and 35kWp Solar Panel system, which is supported in principle. However, the energy assessment does not properly represent all the end use of the spaces within the co-living part of the development and the overheating assessments fails to access the overheating risks in the amenity spaces, lacks future weather modelling and its mitigation measures. Clarifications must be provided in relation to the Energy Strategy and Overheating Strategy as detailed below. This should be addressed prior to the determination of the application. **2. Energy Strategy** Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L 2021). The London Plan (2021) further confirms this in Policy SI2. The overall predicted reduction in CO2 emissions for the development shows an improvement of approximately 56.1% in carbon emissions with SAP10.2 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 66.8 tonnes of CO2 from a baseline of 119.20 tCO2/year. London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are: 64.3 tCO2.	

Site-wide (SAP10.2 emission factors)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2021 baseline	119.2		
Be Lean	101.5	17.7	14.8%
Be Clean	101.5	0.0	0.0%
Be Green	52.3	49.2	41.3%
Cumulative savings		66.8	56.1%
Carbon shortfall to offset (tCO_2)	52.3		
Carbon offset contribution	£95 x 30 years x 52.3tCO_2/year = £149,055		

10% management fee	£14,905.50

	Residential			**Non=residential**		
	Total regulated emissions (Tonnes CO2 / year)	**CO2 savings (Tonnes CO2 / year)**	**Percentage savings (%)**	**Total regulated emissions (Tonnes CO2 / year)**	**CO2 savings (Tonnes CO2 / year)**	**Percentage savings (%)**
Part L 2021 Baseline	112.3			6.85		
Be Lean	95.8	16.5	14.7%	5.68	1.17	17%
Be Clean	95.8	0.0	0.0%	5.68	0.0	0.0%
Be Green	50.1	45.7	40.7%	2.23	3.45	50.4%
Cumulative savings		62.2	55.4%		4.62	67.4%
Carbon shortfall to offset (tCO2)	50.1			2.23		

Actions:

- Please submit the GLA's Carbon Emission Reporting Spreadsheet in excel format.

- Please submit SAP and BRUKL sheets for a representative selection of the development for the Be Lean and Be Green scenarios including studious, types of amenity spaces, and commercial units.
- What is the calculated Primary Energy Factor?

Energy Use Intensity (EUI) / Space Heating Demand (SHD)
Applications are required to report on the total Energy Use Intensity (EUI) and Space Heating Demand (SHD), in line with the GLA Energy Assessment Guidance (June 2022). The Energy Strategy should follow the reporting template set out in Table 5 of the guidance, including what methodology has been used. EUI is a measure of the total energy consumed annually, but should exclude on-site renewable energy generation and energy use from electric vehicle charging.

	Proposed Development		GLA Benchmark
Building type	**Residential**	**Non-residential**	Residential and all other non-residential
EUI	95 kWh/m²/year	61.5 kWh/m²/year	Does not meet GLA benchmark of 35/65/55 kWh/m²/year
SHD	kWh/m²/year		Does not meet GLA benchmark of 15 kWh/m²/year
Methodology used	Bespoke calculation (provide details in column T) & CIBSE TM54		

Actions:
- The calculated Energy Use Intensity (excluding renewable energy) is very high than the GLA benchmark. Please explore measures to improve this.
- What is the calculated space heating demand? How does this perform against the GLA benchmark of 15 kWh/m2/year? Please submit the information in line with the GLA's reporting template.

Energy – Lean

The applicant has proposed a site-wide saving of 17.7 tCO2 in carbon emissions (14.8%) through improved energy efficiency standards in key elements of the build. This goes beyond the minimum 10% and 15% reduction for residential and non-residential respectively set in London Plan Policy SI2, so this is supported.

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

Floor u-value	0.11 W/m2 K
External wall u-value	0.15 W/m2 K
Roof u-value	0.12 W/m2 K
Door u-value	1.0 W/m2 K
Window u-value	0.90 W/m2 K
G-value	0.40
Air permeability rate	3 m3 /hm2 @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery e.g. Domus AQH200-B
Thermal bridging	Accredited Construction Details
Low energy lighting	95lm/W
Heating system (efficiency / emitter)	Be Lean: Central gas-fired boiler (SEDBUK 89.5% efficient) (Be Green: air source heat pump SCOP 2.79)

Actions:

Commercial

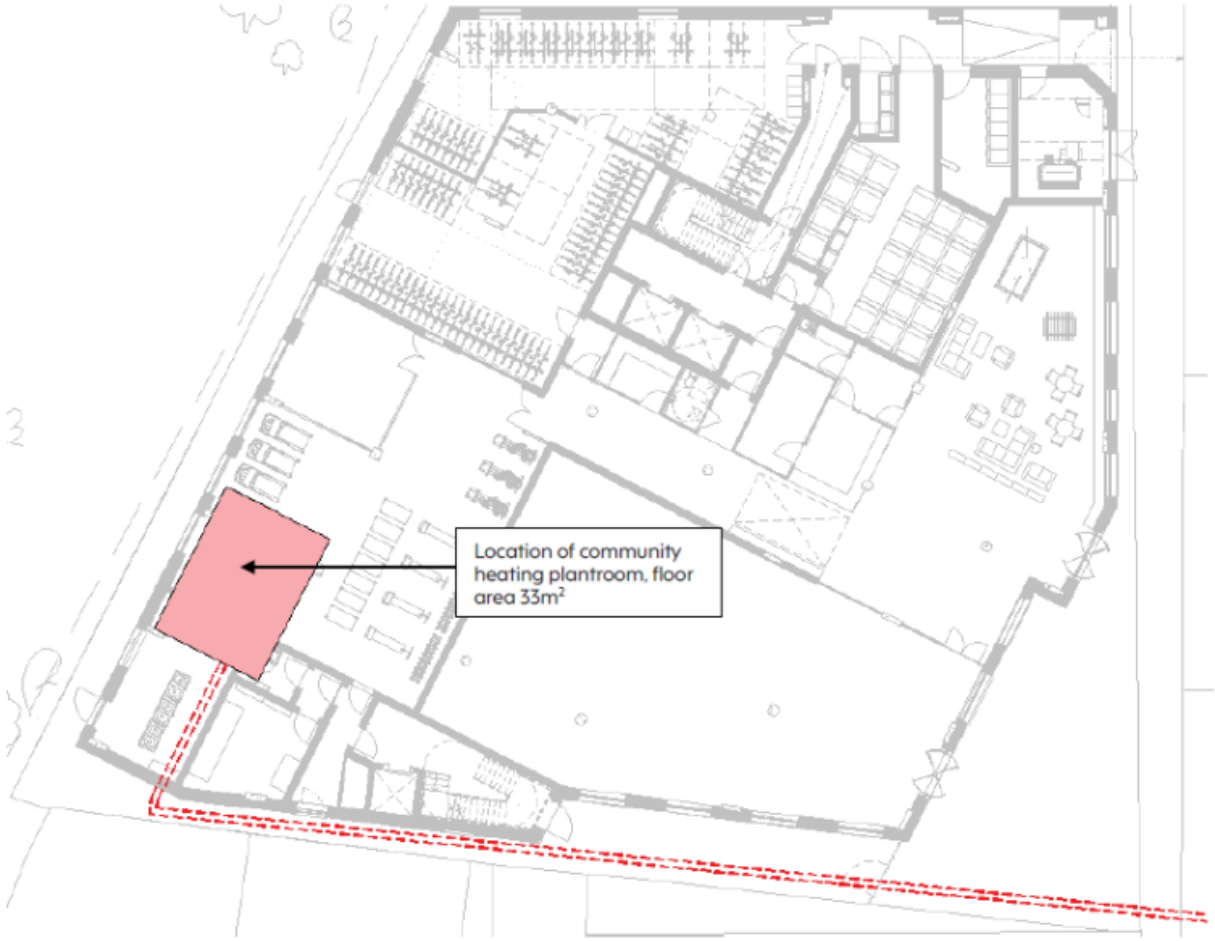
- Submit the individual end use BER for specific end users in line w CIBSE Guide F
- Justify the high cooling demand and explore measures to minimise this aiming to be within the notional cooling demand.

Overheating is dealt with in more detail below.

Energy – Clean

London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of

	the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs. The development is within 500 meters of a planned future DEN, so the development is expected to be future proofed to secure connection subject to demonstration of technical feasibility and financial viability. The Be Clean strategy to connect to the District Heat in Wood Green is generally acceptable. A 33m2 plantroom is proposed for the future district heating heat exchangers (twin transformer substation 2@66% peak heat demand). The applicant has submitted a site plan showing a single point connection at the edge of the site for future DEN connection as follows:	



Energy – Green
As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.

The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 49.2 tCO2 (41.3%) reduction of emissions are proposed under Be Green measures.

Solar photovoltaic (PV) panels	
Peak output	35 kWp
Renewable electricity produced per year	27,468 kWh/year (equivalent to a reduction of 3.7 tCO_2/year)
Orientation and angle	15 degrees
Battery storage capacity	N/A

Hot water and heating system	
Type	VRF heating and cooling system for commercial space. Centralised air source heat pump for hot water and domestic space heating.
Min. SCOP	2.79
SEER	4.68 (commercial)
Heat loss factor	5W/m

Actions:

- Please provide some commentary on how the available roof space has been maximised to install solar PV. Has your feasibility shown that other roofs area will not be viable / will they be used for other purposes?

Energy – Be Seen
London Plan Policy SI2 requests all developments to 'be seen', to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy

	use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies. The applicant should install metering equipment on site, with sub-metering by dwelling and non residential unit. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents/businesses. <u>Actions:</u> - What are the unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters, battery storage? - Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: (https://www.london.gov.uk/what-wedo/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoringguidance/be-seen-planning-stage-webform) **3. Carbon Offset Contribution** A carbon shortfall of 52.3 tCO2/year remains. The remaining carbon emissions will need to be offset at £95/tCO2 over 30 years **4. Overheating** London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy. In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 for residential units and CIBSE TM52 for commercial units, with TM49 weather files and the cooling hierarchy has been followed in the design. The report has modelled 29 studios from a representative sample of the worst-case units from the top two floors (7th and 8th floors) under the London Heathrow weather files. Due to the noise constraints of this site being adjacent to the railway line, the TM59 criteria for predominantly mechanically ventilated dwellings apply (assuming windows need to remain closed at night) on the facades facing the railway link.	

Results are listed in the table below.

Co-living: CIBSE TM59	Predominantly naturally ventilated		Predominantly mechanically ventilated	Number of corridors pass
	Criterion A (<3% hours)	Criterion B for bedrooms (less than 33 hours)	Number of habitable rooms pass (<3% hours)	
DSY1 2020s	29/29	29/29	11/11	0/0
DSY2 2020s	29/29	0/29		
DSY3 2020s	24/29	0/29		
DSY1 2050s				
DSY1 2080s				

Commercial: CIBSE TM52	Number of habitable spaces that pass at least 2 out of 3 criteria 1: hours of exceedance
	2: daily weighted exceedance 3: upper limit temperature
DSY1 2020s	14/14
DSY2 2020s	
DSY3 2020s	
DSY1 2050s	
DSY1 2080s	

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

- Natural ventilation, with three opening types
    - Type 1 – Ventilation panel – 0.96 m2
    - Type 2 – Openable Window – 1.63 m2 100% openable areas, side hung to 90o
    - Type 3 – Fixed Window – Fixed closed
- Glazing g-value of 0.40
- External horizontal and vertical shadings fins
- Large insulated openable panels –

	- MVHR with summer bypass (104l/s) for noise restricted units.
	- No active cooling
	
	No future mitigation measures proposed.
	
	In addition, the applicant confirms providing an overheating guidance documents to occupants to help manage overheating that includes:
	- Explaining daytime ventilation and use of blinds during the day e.g. when units are unoccupied.
	- Promoting the use of local fans to create air movement to cool the skin, as well as low energy evaporative cooling fans to cool the air,
	- The use of MVHR with summer bypass for additional background ventilation
	- Encouraging the use of low energy/heat generating equipment.
	
	<u>Actions:</u>
	- Redo the overheating modelling with the Central London weather file, which will more accurately represent the urban heat island effect. Please follow the Haringey Overheating Planning Guidance.
	- Specify the technical specification of the external horizontal and vertical fins, and submit images, elevations and sections showing where these measures are proposed.
	- Please confirm if the MVHR with summer bypass is proposed only for the units with noise restrictions? Submit the floorplans showing which habitable spaces will be predominantly naturally ventilated or mechanically ventilated.
	- Undertake further modelling:
	  o Model DSY1 for the 2050s and 20280s. Ensure the design has incorporated as many mitigation measures to pass these more extreme and future weather files as far as feasible. Any remaining overheating risk should inform the future retrofit plan.
	  o Communal spaces like amenity spaces, garden room, private dining etc.
	  o Communal corridors, where pipework runs through.
	- Specify the active cooling demand (space cooling, not energy used) on an areaweighted average in MJ/m2 and MY/year? Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point / any renewable sources.	

- Set out a retrofit plan for future and more extreme weather files, demonstrating how these measures can be installed, how they would reduce the overheating risk, what their lifecycle replacement will be, and who will be responsible for overheating risk.
- Demonstrate how the future mitigation measures will improve the overheating results.
- Identify communal spaces (indoor and outdoor) where residents can cool down if their flats are overheating.

5. Sustainability

Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design.

BREEAM Requirement

Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.

The applicant has also prepared a multi-residential BREEAM Pre-Assessment Report for the commercial units. Based on this report, a score of 73.6 % is expected to be achieved, equivalent to 'Excellent' rating. A potential score of 89.1% could be achieved.

Urban Greening / Biodiversity

All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff.

	The areas of different land use/habitats will consist of: (i) building (353m2); (ii) 564m2 of biodiverse 'intensive' green roof (minimum of 150mm depth of substrate); (iii) 42m2 of introduced shrub; (iv) 96m2 of urban trees; iv) 398m2 of permeable paving (Sustainable Urban Drainage). This results in a total net gain of 0.36 habitat units, which is supported. An urban greening factor of 0.40 is proposed which is supported. <u>Actions:</u> - Please submit the biodiversity net-gain spreadsheet ***Living roofs*** All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. The development is proposing living roofs in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. Living roofs are supported in principle, subject to detailed design. Details for living roofs and its relationship with Solar Panels will need to be submitted as part of a planning condition. **6. Planning Conditions** To be secured (with detailed wording TBC) - Energy strategy - Overheating - BREEAM Certificate for "Excellent" - Living roofs - Biodiversity Net Gain - Urban Greening Factor	

7. Planning Obligation Heads of Terms

- Be Seen commitment to uploading energy data
- Energy Plan
- Sustainability Review
- Estimated carbon offset contribution (and associated obligations) of £149,055 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages.
- - A single point Future DEN connection (and associated obligations)

Carbon Management Response 20/11/2024

In preparing this consultation response, we have reviewed:

- Energy & Sustainability Statement Rev 02 prepared by Integration (dated 13 November 2024)
- Overheating Analysis Rev 02 prepared by Integration (dated 13 November 2024)
- Relevant supporting documents.

1. Summary

The development achieves a reduction of 55% carbon dioxide emissions on site with communal air source heat pump and 40kWp Solar Panel system, which is supported in principle. The updated energy assessment now represents the end use within the co-living spaces, i.e. co-living studios as residential use and amenity space as non-residential use. However, the modelling of commercial and amenity spaces has not been represented appropriately based on its end uses. The principle of energy strategy is supported, while further clarification is required in regard to the end-use modelling of commercial and amenity spaces. Appropriate conditions have been recommended to secure the benefits of this scheme.

2. Energy Strategy

The updated energy assessment shows an improvement of approximately 56.1% reduction in emissions for the development with SAP10.2 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 66.3 tonnes of CO2 from a baseline of 119.80 tCO2/year. The calculated unregulated emissions are: 66 tCO2.

Site-wide (SAP10.2 emission factors)			
	Total regulated emissions (Tonnes CO_2 / year)	CO_2 savings (Tonnes CO_2 / year)	Percentage savings (%)
Part L 2021 baseline	119.8		
Be Lean	102.1	17.7	15%
Be Clean	102.1	0.0	0%
Be Green	53.5	48.6	41%
Cumulative savings		66.3	55%
Carbon shortfall to offset (tCO_2)	53.5		
Carbon offset contribution	£95 x 30 years x 53.5tCO_2/year = £ 152,475		
10% management fee	£ 15,247.50		

	Residential			**Non=residential**		
	Total regulated emissions (Tonnes CO2 / year)	**CO2 savings (Tonnes CO2 / year)**	**Percentage savings (%)**	**Total regulated emissions (Tonnes CO2 / year)**	**CO2 savings (Tonnes CO2 / year)**	**Percentage savings (%)**
Part L 2021 Baseline	112.3			7.5		
Be Lean	95.8	16.5	15%	6.3	1.2	16%
Be Clean	95.8	0.0	0%	6.3	0.0	0%
Be Green	50.1	45.7	41%	3.4	2.9	39%
Cumulative savings		62.2	55%		4.1	54%
Carbon shortfall to offset (tCO2)	50.1			3.4		

Actions:

- Please submit BRUKL sheets for a representative selection of the non-residential spaces of the development for the Be Lean and Be Green scenarios including different types of amenity spaces, and commercial units. This has been conditioned.

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

	Proposed Development		GLA Benchmark
Building type	**Co-living spaces**	**Non-residential**	Residential and all other non-residential
EUI	87.12 kWh/m²/year	60.53 kWh/m²/year	Does not meet the new UK Net Zero Carbon Building Standard value of 75 kWh/m²/year
SHD	7.80 kWh/m²/year	14.98 kWh/m²/year	Meets the GLA benchmark of 15 kWh/m²/year
Methodology used	Bespoke calculation (provide details in column T) & CIBSE TM54		

The updated energy assessment shows an improvement in the report EUI, which is still higher than the GLA and UK Net zero Carbon Building benchmarks. It is acknowledged that co-living spaces is different from residentials, therefore, the GLA target for residential shall not be appropriate to this scheme. The proposal still shows higher EUI than the new UK Net Zero Carbon Building Standard value of 75 kWh/m2 /year for student accommodation (similar to co-living spaces). According to the report, this is because co-living spaces have additional equipment resulting higher EUI, however, the report fails to mention this specific equipment.

Actions:

- Please explore measures to further reduce the Energy Use Intensity of the proposed co-living spaces. This has been conditioned.

Energy – Lean

The applicant has proposed a site-wide saving of 17.7 tCO2 in carbon emissions (14.8%) through improved energy efficiency standards in key elements of the build. This goes beyond the minimum 10% and 15% reduction for residential and non-residential respectively set in London Plan Policy SI2, so this is supported.

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

Floor u-value	0.11 W/m²K
External wall u-value	0.15 W/m²K
Roof u-value	0.12 W/m²K
Door u-value	1.0 W/m²K

Window u-value	0.90 W/m²K
G-value	0.40
Air permeability rate	3 m³/hm² @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery e.g. Domus AQH200-B
Thermal bridging	Accredited Construction Details
Low energy lighting	95lm/W
Heating system (efficiency / emitter)	Be Lean: Central gas-fired boiler (SEDBUK 89.5% efficient) (Be Green: air source heat pump SCOP 2.79)

Overheating is dealt with in more detail below.

Energy – Clean
No further comments.

Energy – Green
The applicant has added additional panels to the roof, resulting in an increase total output of 40kWp.

Energy – Be Seen
The scheme proposes the use of Demand Side Response to reduces peak energy demand by:

- The use of electrical equipment such as heat pumps which can be turned up/down.
- A large central energy store integrated into the centralised heat pumps system
- Additional energy storage capacity via exposed thermal mass.
- Limiting demand such as peak solar gains (refer to cooling and overheating section).

- The installation of smart meters and Be Seen Monitoring.
- The use of on-site generation, solar PV.

3. Carbon Offset Contribution

A carbon shortfall of 53.5 tCO2/year remains. The remaining carbon emissions will need to be offset at £95/tCO2 over 30 years

4. Overheating

The applicant has now updated the dynamic thermal modelling assessment with London Weather Centre files and have modelled future weather files (2050s & 2080s) as well.

The report has modelled three cases for co-living spaces:
Case 1: All spaces pass the CIBSE TM59 overheating standard with no opening restrictions. This shows that the scheme is well designed in line with the cooling hierarchy.
Case 2: Spaces with opening restrictions due to acoustic restrictions fail the CIBSE TM59 overheating standard due to restriction in openable area at night for natural ventilation.
Case 3: To overcome the reduced performance arising from acoustic restrictions, additional interventions in form of MVHR is introduced, with which, the noise restricted studios pass the TM59 overheating standard.

The final results are listed in the table below.

Co-living: CIBSE TM59	Predominantly naturally ventilated		Predominantly mechanically ventilated	Number of corridors pass
	Criterion A (<3% hours)	Criterion B for bedrooms (less than 33 hours)	Number of habitable rooms pass (<3% hours)	
DSY1 2020s	29/29	29/29	11/11	0/0
DSY2 2020s	29/29	0/29		
DSY3 2020s	24/29	0/29		
DSY1 2050s	27/29	0/29		
DSY1 2080s	22/29	0/29		

Commercial: CIBSE TM52	Number of habitable spaces that pass at least 2 out of 3 criteria 1: hours of exceedance 2: daily weighted exceedance 3: upper limit temperature
DSY1 2020s	14/14
DSY1 2050s	12/14
DSY1 2080s	1/14

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

Co-living spaces:

- Natural ventilation, with three opening types
  - Type 1 – Ventilation panel – 0.96 m2
  - Type 2 – Openable Window – 1.63 m2 100% openable areas, side hung to 90o
  - Type 3 – Fixed Window – Fixed closed
- Glazing g-value of 0.40
- Heavy weight thermally massive structure
- External horizontal and vertical shadings fins
- Large insulated openable panels
- MVHR with summer bypass (105l/s) for noise restricted units.
- Active cooling ONLY for commercial units.

The future overheating risk mitigation measures include:

- Use of highly reflective blinds coving the fixed glazing.
- Residents to be informed of suitable product (or to be provided) that reduces overheating such as pedestal fans, fans with evaporative cooling and ceiling mounted fans.
- Supplementary ventilations and cooling depending on the extent of the change to future climate.
-

In addition, the applicant confirms providing an overheating guidance documents to occupants to help manage overheating that includes:

- Explaining daytime ventilation and use of blinds during the day e.g. when units are unoccupied.

	- Promoting the use of local fans to create air movement to cool the skin, as well as low energy evaporative cooling fans to cool the air, - The use of MVHR with summer bypass for additional background ventilation - Encouraging the use of low energy/heat generating equipment. Action: - Provide more details on the working mechanism of the ventilation panels, does it also provide noise attenuation? **5. Sustainability** No further comments. **6. Planning Conditions** To be secured: **Energy strategy** (a) Prior to the commencement of development, a revised Energy Statement shall be submitted and approved by the Local Planning Authority. This shall be based on the submitted Energy & Sustainability Statement Rev 02 prepared by Integration (dated 13 November 2024), delivering a minimum site-wide carbon emission reduction of 55% from a Building Regulations 2021 Part L compliant building, with high fabric efficiencies, centralised air source heat pumps, a minimum of 40kWp solar photovoltaic (PV) array and a single point Future DEN connection. The revised strategy shall include the following: - Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy; 12 - A minimum site-wide carbon reduction of 15% under Be Lean; - Detailed BRUKL calculations for the individual end use (commercial, and types of amenity spaces) of non-residential element of the development; - Details to reduce the thermal bridging; - Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures; - Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;	

	- Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); inverter capacity; and how the energy will be used on-site before exporting to the grid; - Specification of any additional equipment installed to reduce carbon emissions, if relevant; - A metering strategy The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. (b) The solar PV arrays and air source heat pump must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter. (c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform. Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22. **Overheating** Prior to occupation of the development, details of external blinds, ventilation panels, to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, flow rates, specification of the blinds, shading coefficient, etc.	

	The following overheating measures must be installed prior to occupation and be retained for the lifetime of the development to reduce the risk of overheating in habitable rooms in line with the Overheating Analysis Rev 02 prepared by Integration (dated 13 November 2024):
	- Natural ventilation, with three opening types
	  o Type 1 – Ventilation panel – 0.96 m2
	  o Type 2 – Openable Window – 1.63 m2 100% openable areas, side hung to 90o
	  o Type 3 – Fixed Window – Fixed closed
	- Glazing g-value of 0.40
	- Heavy weight thermally massive structure - External horizontal and vertical shadings fins
	- Large insulated openable panels
	- MVHR with summer bypass (104l/s) for noise restricted units.
	- Active cooling ONLY commercial
	
	If the design of Blocks is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.
	
	Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.
	
	BREEAM Certificate for "Excellent"
	a) Prior to commencement on site for the relevant non-residential unit, a Design Stage Assessment and evidence that the relevant information has been submitted to the BRE for a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM "Excellent" outcome (or equivalent). This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.
	b) Within 6 months of commencement on site, the Design Stage Accreditation Certificate must be submitted. The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.
	c) Prior to occupation, the Post-Construction Stage Assessment and tool, and evidence that this has been submitted to BRE should be submitted for approval, confirming that the	

development has achieved a BREEAM “Excellent” outcome (or equivalent), aiming for “Excellent”, subject to certification by BRE.

d) Within 6 months of occupation, a Post-Construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming “Excellent” standard has been achieved.

In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority’s approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.

Living roofs

(a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:

i. A roof plan identifying where the living roofs will be located;

ii. A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);

iii. Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate

iv. Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m2 of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m2, rope coils, pebble mounds of water trays;

	v. Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m2) and density of plug plants planted (minimum 20/m2 with root ball of plugs 25cm3) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native); vi. Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and vii) Management and maintenance plan, including frequency of watering arrangements. vii. A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site (b) Prior to the occupation of 90% of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roof have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements. Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13. **Biodiversity Net Gain** (a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain of at least 0.36 habitat units, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats (b)Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection	

	measures is in accordance with the approved measures and in accordance with CIEEM standards. Development shall accord with the details as approved and retained for the lifetime of the development. Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13. **Urban Greening Factor** Prior to completion of the construction work, an Urban Greening Factor calculation should be submitted to and approved by the Local Planning Authority demonstrating a target factor of 0.40 has been met through greening measures. Reason: To ensure that the development provides the maximum provision towards the urban greening of the local environment, creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13. **7. Planning Obligations Heads of Terms** - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations) of £152,475 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages. - A single point Future DEN connection (and associated obligations)	
Design Comments	HGY/2024/2279 - 25-27 Clarendon Road, Wood Green, London, N8 0DD Demolition of existing buildings and delivery of a new co-living development and affordable workspace, alongside public realm improvements, soft and hard landscaping, cycle parking, servicing and delivery details and refuse and recycling provision.	Comments noted.

	Thank you for asking for my comments on the above application, with which I am very familiar, having been involved in pre-application meetings and Quality Review Panels (QRPs) on the site from the start of its journey through the planning system. **Site Location & Planning Policy Context** The site is located in the centre of the borough, in Wood Green. It is just west of the East Coast Main Line railway out of Kings Cross, which divides the western third of the borough from its eastern two thirds, and runs in an embankment immediately west of the site. It is just to the south east of the Wood Green Metropolitan Town Centre, which runs predominantly along the High Road, a major north-south arterial road, and forms the most important town centre in the borough and in the wider North London. It is just to the north of Turnpike Lane, one of the important east-west cross streets, connecting the east and west of the borough, with its important eponymous tube station, the site's closest, where it meets Wood Green High Road. The site is towards the southern edge of the Haringey Heartlands Growth Area, adopted in the London Plan and Haringey Local Plan, identifying the site as part of a major growth area. This covers a wide area of current and former industrial uses between Wood Green Town Centre and the railway line. Like much if the growth area, this site is also part of a Site Allocation in the borough's adopted Local Plan (2017) and more recent draft Wood Green AAP. Both site allocations cover the same group of industrial sites including this application site, its immediate neighbours to the north and south and those on the opposite, eastern side of Clarendon Road, the street onto which this site opens. The Site Allocation, titled SA23: Clarendon Rd South, is to "Realign Clarendon Rd and create employment led mixed use development to complement the Clarendon Road Square development site". The site is also within the adopted Wood Green Haringey Heartlands Growth Area. Clarendon Road, which forms the street frontage and provides access to this application site, runs north-south, but at its southern end, just over 50m from this site, terminates due to the relatively recent construction of Westpoint Apartments, a six storey residential block separating Clarendon Road from Turnpike Lane, just to its south. Instead, a relatively new link road turns off Clarendon Road directly opposite this application site, and via a couple of curves, joins parallel street Hornsey Park Road about 90m to the east, just before Hornsey Park Road meets Turnpike Lane at an elaborate crossroads, with Wightman Road forming its southern continuation, and Turnpike Lane forming a busy shopping street running east and crossing under the railway to the west.	

	The railway embankment immediately to the west of the site is about 15-30m high and densely wooded, forming an adopted Ecological Corridor. At the top of the embankment, the immediate neighbour is a rail depot, with the main line tracks beyond, some 40m from the nearest point on this application site. The railway creates a very real divide between communities to its east and west, on its raised embankment and with limited crossings; the nearest ones being the long tunnel of busy Turnpike Lane fairly close to the south and the pedestrian Penstock Tunnel about 500m to the north. Masterplan and Compatibility with Adjoining Sites and Developments Current immediate neighbours to either side are the Alevi Cultural Centre to the south and Civica Electoral Services to the north. Both are in active use for their respective community and business uses and have had recent investment in their building facilities. In accordance with the site allocation requirement for the applicant to engage in masterplanning consultations with neighbours, the applicants report that they both have every intention to continue their current use of their sites, with no current intention to redevelop their sites. Nevertheless, in accordance with policy requirements, the applicants have successfully demonstrated masterplan requirement compatibility by demonstrating their proposals to be compatible with either neighbour continuing in its current form and use, as well as a couple of possible redevelopment options similar to their proposals for their own site. Further sites on the opposite side of Clarendon Road form the rest of the site allocation. These include the Virgin Media site, occupying most of the part of the site allocation east of Clarendon Road and north of the link road, which has similarly indicated no current plans for redevelopment. South of the link road, there are three separate land holdings; the West Indian Cultural Centre (WICC) is furthest to the south, with Clarendon Recovery College (CRC) and then 30-36 Clarendon Road directly opposite this application site. There have been a number of proposals taken well into the pre-application process for all three sites, but various concerns have led to them not being progressed do far, except for 30-36, for which a residential and workspace development, rising to 12 storeys, was granted planning permission in June 2023 (HGY/2022/3846). It should be noted that in masterplanning discussions for this site alone and from when it was being considered as part of a development with its two southern neighbours, a strategy was agreed to rise up to a mini-landmark at the corner of Clarendon Square and the link road and a major	

	landmark at the crossroads of the link road, Hornsey Park Road, Wightman Road and Turnpike Lane. Adjoining the northern boundary of this Site Allocation, also the adjoining part of the Heartlands Growth Area, is the major development site known for the last fifteen years as Clarendon Square, but recently renamed as Alexandra Gate. This was granted planning permission, as a hybrid consent, in April 2018 (HGY/2017/3117) for around 2,800 homes as well as a large amount of workspace and other town centre and ancillary uses, in a stepped, college development of several blocks and plots. This innovative development has built out about half and is progressing apace, with pre-application discussions for what should be the final phase just commenced. Its completed southern quarters, closest to this application site, are characterised by stepped residential blocks of 4-12 storeys in interlocking L-shaped plans creating interlocking public pocket parks and build frontage along Clarendon Road (which changes name to Mary Neuner Way). A new public park between its southern and central quarters, completed before any of their blocks, means it makes a wider contribution to other neighbouring developments including this application, and its development pattern of pocket parks facing built frontages is particularly recognised as a successful feature that has been encouraged for subsequent developments including this application. Streetscape Character & Pattern of Development This proposal builds up to the street frontage over the northern half of their site, where it faces the opening of the link road, with a pocket park and recessed building line over their southern half, where it will face the closest part of the built form of the approved scheme for the opposite site at 30-36 Clarendon Road, emulating the pattern of development and strategy of how to address the street of Clarendon Square, considered a very successful model. The Clarendon Square development has also renewed the street surfacing, pedestrian paving and street landscaping, to “take” the landscape features “across” the street, and the applicants for this development propose to doo the same. Similarly, in the approved proposals for 30-36, significant streetscape landscaping along the link road are proposed. This is to be hugely welcomed, and represents a way to significantly improving the value to be gained from this applications mall pocket park, as well as integrating the development into its surroundings, especially into Clarendon Square. Nevertheless, the translation of the park across the street will need to be secured by condition. The pocket park contribution is in two parts; a small	

	street-level, public park; and a large, raised to 1st floor private communal amenity space, opening off the main communal internal amenity spaces of the development, yet with strong visual connections to the lower park. The balustrade will be low and visually permeable, to promote the visual connection, whilst the public park provision is realistic. The proposals' ground floor frontages to the street provide a very good, high level of vibrant active frontage, with the main entrance to the combined facilities, and an entrance lobby / "games area taking most of the ground floor frontage of the portion of the proposed building closest to the street, with the sub-station that also requires street frontage being the shortest possible frontage. The ground floor frontage to the back of the pocket park is to be wholly taken up by windows and doors onto the proposed pubic co-working space, so will provide vibrantly active frontage during the day, and in spill-out activity likely form co-working space further animate their proposed public pocket park. The ground floor will also have higher floor to ceiling heights. Fenestration to ground floor active frontage is proposed to be in large windows in deep reveals with low cills that act as window seats, further animating the street frontage, Form, Bulk, Height, and Massing The form of the proposal is split into two contrasting blocks; the block closest to the street, and the block set back behind the pocket park / raised amenity garden. The rear block aligns with the rear of the site, the embankment to the railway depot, and beyond that the tracks, so that it forms an angle to the street, and the side of the front block makes a right angle with this, opening up the depth and width of the raised amenity space deeper into the site. The front block has a facetted corner to avoid an acute angle and further highlight the entrance and its general prominence. The split into two blocks is modelled similarly but more simply to the rear, with a smaller raised podium garden forming a secluded "evening garden looking out at the wooded railway embankment and providing an appealing Both blocks are of the same overall height of nine storeys, but avoid the concern of an appearance of merging into each other by using contrasting elevational treatment. The proposed height is therefore above the formal definition of a tall building, which kicks in at six storeys / 18m, but is of modest height overall compared to approved schemes at 30-36 and Clarendon Square. However, Clarendon Square's block heights gradually step down from their tallest buildings completed so far, at 17 storeys, north of their public park, and higher still at 26 storeys in the most recently	

	permitted reserved matters at the northern end of the site, to four to seven storeys at their southern end closest to the development, so this proposed height can be seen as a moderate intermediate between the southern end of Clarendon Square and greater height at the southern end of Clarendon Road South. Medium and long views of this development have been considered, with views from Alexandra Palace Terrace, Hornsey Water Works, and several local viewpoints modelled. These find that the impact of the proposals will not be great, with it being barely noticeable except close too and in general considerably exceeded in height by taller neighbours, particularly 30-36 Clarendon. The proposals are not particularly “modelled”, especially when compared to the approved taller neighbours at 30-36 and Clarendon Square, which both have their mass broken down with several intermediate roof terraces providing a more pleasing, stepped form. This has been the subject of considerable discussion, but the simple, repetitive proposed form here reflects the simple, repetitive reality of co-housing, with every floor housing accommodation of similar small size, compared to the varied sizes of residential units proposed in those other developments. That this proposal is for a simpler, less modelled form can also be seen as reflecting its middle-of-the-block character, and that if as is eventually expected its other immediate neighbours come forwards, it will to a considerable extent slip into the background when the neighbourhood as a whole, its heights and overall bulk and form are visible. Not every building should strive to be a landmark, especially in a mid-street-frontage, mid-block location in the middle of a Growth Area. This site is one such, middling site, and as such, in design terms its fairly simple form, simplistic bulk and relatively modest height is considered appropriate in design terms. Elevational Treatment, Fenestration, Balconies, Accommodation, Materials & Detailing The architectural character and strategy for elevational treatment of the proposals are contemporary, but with elements of being a contemporary reinterpretation of mansion blocks and warehouses as has commonly and successfully been adopted in many growth areas such as this. Notwithstanding its simplicity, the elevations are carefully composed, with its regular grids of windows embellished and elaborated with deep reveals and projecting surrounds to avoid the appearance of small, repetitive windows, and these features along with the surrounding brickwork	

	are varied in layers of patterns to model the elevations to create variation and pleasing composition. To the front block, the ground and first floors are treated as a two storey base, with a darker brick and with surrounds of glazed red brick taken around ground and first floor openings, with light weight, bronze toned metal spandrel panels between them. The pattern of pairing windows with those above is repeated over the next six floors, forming a three-double-floor “middle”, and with the top floor a contrasting light-weight, profiled metal “top”. In contrast, the rear block “starts” a floor higher, over the single storey podium garden, so that its two storey base and paired middle floors are off-set in height form those on the front block, who’s elevational treatment nevertheless continues where it is side on to the raised podium, so that the front block’s base reduces to one storey for the majority of that side elevation. The off-set floors of the rear block culminate in the top floor parapet, nevertheless in brick, unlike the front block’s light-weight profiled metal, finishing a little higher than the front block, giving greater subtle contrast between the two blocks, especially when seen from close-too. The elevational treatment continues in simplified forms along the flank elevations, where windows are mostly, apart from windows to corridors and some secondary windows, replaced with recessed brick panels. This will avoid reliance on getting daylight and air from narrow gaps of only a metre or two to neighbouring buildings at lower floors, and allow future development of neighbouring sites. Fenestration manages really well to avoid small windows that are so often found on developments such as these. This includes the particularly generous near floor-to-ceiling glazing to communal amenity facilities, and tall broad windows to studio-bedrooms. It will be really important to ensure this design feature is retained in implementation of the proposals. However, there has also been considerable thought undertaken by the applicants’ architects of how to ensure solar shading and ventilation is achieved, which is encouraging. As is to be expected in co-housing and similar alternative forms of residential provision, individual balconies are not provided. Instead a generous amount of internal and external communal amenity provision is to be provided, including tow first floor podium gardens, a ground floor residents’ gym, a range of communal sitting, dining and kitchens off the front garden, a screening room off the rear garden and a top floor amenity room with views to the west over Alexandra Palace and Park.	

	The residential provision itself, the studio bedrooms, are simple and modestly sized, as is to be expected in accommodation of this new and rapidly emerging form, but is of a size, specification and quality far better than the early built schemes of this form, and fully in compliance with emerging GLA guidance. Corridors are inevitably long and somewhat repetitive, but are enlivened with glazing at the ends of most corridors, in many cases in a widened space with a window seat, although it is understandable the short corridors at the ends of the astern wing cannot achieve this. Furthermore, where circulation runs alongside communal accommodation, it will, as much as can be achieved, include windows onto the corridor from the communal amenity facilities, avoiding as much as can be expected the danger of anonymous, repetitive, soul-less corridors without natural light, animation and interest. The proposed material palette has been extensively described above as it is integrated deeply into the elevational composition, but as can be seen is brick based, with several contrasting tones of brick, as well as stone and metal elements. All will be subject to material samples and large scale detailed drawings of key junctions and edges being provided by condition, as is routinely to be expected in major developments. Conclusions The proposals are for a major development, and of a height that takes them over the surrounding low to medium high existing context, but in height and form are far from out of context of the rapidly emerging context that includes taller and more ostentatious, landmark-character buildings close by, to the north, immediately to the east and it is expected, eventually to the south of this development site. Therefore it can be seen as a normal, middle-of-the-block proposal, in the wider scheme of things. Its overall design is not elaborately modelled to be pleasing when viewed from a distance, but it is not likely to be viewed, or not much and not obviously in comparison with more dominant neighbours. Nevertheless, the proposals should look interesting from the street, enlivening the street frontage with excellent active frontage, and most impressive of all, a pocket park encompassing landscaping public realm improvements to and across the street itself. This provides a continuation of the very successful development pattern pioneered in the nearby Clarendon Square development, but with subtle modifications more appropriate to this more working focussed Clarendon South neighbourhood, itself reinforced with the co-working space proposed for this	

	development. The landscaping has been simplified and made more robust since the last QRP, and promises to be hugely beneficial, albeit details of this too will be subject to condition. The proposed co-living accommodation has been intensively interrogated by officers and the QRP, and has been demonstrated to be humane, meet real needs and to have been designed with thought, to provide pleasant accommodation and attractive whilst functional communal servicing and amenities. Overall the architectural treatment is refined and elegant, promising an attractive and yet robust detailing and palette of materials supporting a realistic expression of the internal accommodation and a pleasing external appearance. Regards	
Waste Management Team	The proposals for this development are for 222 co-living units with associated ancillary facilities at ground and first floor levels. It will also comprise 231 sqm of commercial space at ground floor level. The waste management plan clearly outlines the calculations used for the waste/ recycling storage capacity proposed which is based on BS5906- 2005. These are acceptable although L B Haringey only collects food waste in containers up to a maximum of 140 litres. Appendix A – the layout of the bins in the bin storage rooms looks cramped and not all containers are accessible. They would also be difficult for operatives to manoeuvre. Our guidance advise that bin storage areas ‘ have internal layouts that allow all containers to be accessed by users. Any one container must be able to be safely and easily removed from/put back to its original location within the bin store without the need to move other waste containers.’ It is proposed that the servicing of the waste and recycling bins would be undertaken on-street outside the site frontage within a shared use loading and disabled bay. The number and potential frequency of containers that need servicing at any one time may mean the bay is unavailable for some time or may already be occupied, preventing collection crews from stopping. The co-living model is something that we have not commented on before, so we are also seeking clarification on the classification of residential waste from this type of premises and whether or not it is chargeable.	Comments noted condition included.

	Comments dated 24 October 2024 Can we condition the proposal concerning role of the FM staff so that waste / recycling containers will always be made accessible to occupants and how they (bins) are managed prior and following collection? There have been occasions where what has been proposed doesn't take place once the building is occupied and managing agents aren't aware of what is agreed at the planning stage.	
Arboricultural Officer	From an arboricultural point of view, I hold no objections. An arboricultural survey, impact assessment and method has been submitted by Marcus Foster Arboricultural Design and Consultancy dated July 2024. The report has been carried out to British Standard 5837: 2012 Trees in relation to Design, demolition and construction-Recommendations. I concur with much of the report including the tree quality classification. There is encroachment into the root protection area (RPA) of T1 Sycamore. However, the incursion into the RPA is minimal (2%) and can be offset due to the current hard surface. An ecology, bat report and landscape plans have been submitted along with the biological net gain being met. Providing all the above is conditioned including all the whole tree report and tree protection plan as shown in drawing T002, I have no objections or major concerns.	Comments noted condition included.
Flood and Water Management Lead	13/11/2024 Thank you for re-consulting us on the above planning application reference number HGY/2022/2279 for Demolition of existing buildings and delivery of a new co-living development and affordable workspace, alongside public realm improvements, soft and hard landscaping,	Comments noted conditions included.

	cycle parking, servicing and delivery details and refuse and recycling provision at 25-27 Clarendon Road Off Hornsey Park Road, Wood Green, London, N8 0DD. Having reviewed the applicant's newly submitted : 1) "Drainage Strategy" drawing reference number 2401540 – ACE – P – DR - N – 0601 Revision A dated June 2024 and 2) Causeway calculations output reference number 215140 dated 25th September 2024 As prepared by Ardent Consulting Engineers, we find that the submission still does not fully address our previous requests and comments outlined in our email from 18th September 2024 (see highlighted points below). However, given the extended time taken and to facilitate a timely decision, we are prepared to recommend approval of this planning application, with the following planning conditions to be implemented: Surface Water Drainage condition No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate: a) Calculations including the Network Diagram cross referencing drainage elements confirming a full range of rainfall data for each return period for 7 days 24 hours provided by Micro drainage modelling or similar simulating storms through the drainage system, with results of critical storms, demonstrating that there is no surcharging of the system for the 1 in 1 year storm, no flooding of the site for 1 in 30 year storm and that any above ground flooding for 1 in 100 year storm is limited to areas designated and safe to flood, away from sensitive infrastructure or buildings. These storms should also include an allowance for climate change. b) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method.	

	c) An evidence from the Thames Water confirming that the site has an agreed rate and point of discharge. Reason : To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter. Management and Maintenance condition Prior to occupation of the development hereby approved, a detailed management maintenance plan for the lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained. Reason: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system. 19/09/2024 Having reviewed the applicant's submitted Flood Risk Assessment Report Reference number 2401540-R01 dated July 2024 as prepared by Ardent Consulting Engineers, we have following comments to make : 1) As a part of the Full planning application, we will require calculations including the Network Diagram confirming a full range of rainfall data for each return period for 7 days 24 hours provided by Micro drainage modelling or similar simulating storms through the drainage system, with results of critical storms, demonstrating that there is no surcharging of the system for the 1 in 1 year storm, no flooding of the site for 1 in 30 year storm and that any above ground flooding for 1 in 100 year storm is limited to areas designated and safe to flood, away from sensitive infrastructure or buildings. These storms should also include an allowance for climate change. 2) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method.	

	3) An evidence from the Thames Water confirming that the site has an agreed rate and point of discharge. 4) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development 5) Details of the Management and maintenance plan for the installed drainage system in perpetuity.	
Pollution Officer	Thank you for contacting the Carbon Management Team (Pollution) regarding the above application for the demolition of existing buildings and delivery of a new co-living development and affordable workspace, alongside public realm improvements, soft and hard landscaping, cycle parking, servicing and delivery details and refuse and recycling provision at 25-27 Clarendon Road Off Hornsey Park Road, Wood Green, London, N8 0DD and I would like to comment as it relates to this service as follows. Having considered the applicant submitted information including: Planning Statement prepared by QSquare, dated July 2024; Energy and Sustainability Statement prepared by Integration UK and taken note of the proposal to install Air Source Heat Pumps and Photovoltaic Modules; Outline Construction Logistics Plan with reference 2024/7756/CLP06 prepared by RGP Consulting Engineers Ltd., taking note of Section 3 (Construction Programme and Methodology), 4 (Vehicle Routing and Access), 5 (Strategies to Reduce Impact), 6 (Estimated Vehicle Movements), 7 (Implementing, Monitoring, and Updating); Preliminary Risk Assessment Report with P5956J3012/SEJ prepared by Jomas Associates Ltd., dated 18 June 2024 taking note of Section 2 (Site Setting), 3 (Geological & Environmental Setting), 5 (Qualitative Risk Assessment); Air Quality Assessment with reference AQ2414, prepared by GEM Air Quality Ltd., dated July 2024 taking note of Sections 4 (Assessment Methodology), 5 (Air Quality Assessment), 6 (Air Quality Neutral Assessment), 7 (Conclusions and Recommendations), please be advised that we have no objections to the proposed development in respect to air quality and land contamination but the following planning conditions and informative are recommended should planning permission be granted.	Comments noted conditions and informative Included.

	1. Land Contamination Before development commences other than for investigative work: a. Using the information already submitted in Preliminary Risk Assessment Report with P5956J3012/SEJ prepared by Jomas Associates Ltd., a site investigation shall be designed for the site using information obtained form the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model and the development of a Method Statement detailing the remediation requirements. b. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. c. 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. Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety. 2. Unexpected Contamination If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved. Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework. 3. NRMM a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the	

	commencement of any works on site. b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion. Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ 4. Demolition/Construction Environmental Management Plans a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The following applies to both Parts a and b above: a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP). b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include: i. A construction method statement which identifies the stages and details how works will be undertaken; ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding; viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance); ix. Details of external lighting; and, x. Details of any other standard environmental management and control measures to be implemented. c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on: i. Monitoring and joint working arrangements, where appropriate; ii. Site access and car parking arrangements; iii. Delivery booking systems; iv. Agreed routes to/from the Plot; v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel	

	to the Plot during the demolition/construction phase; and vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching. d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include: i. Mitigation measures to manage and minimise demolition/construction dust emissions during works; ii. Details confirming the Plot has been registered at http://nrmm.london; iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection); v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate. The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out. Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality." Informative: 1. Prior to refurbishment or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.	
Housing Policy and Strategy Officer	Thank you for asking for representations from the Council's strategic housing perspective. The proposals for co-living accommodation on this site are contrary to the Council's strategic position as set out in its 2024-2029 Housing Strategy. From a strategic housing perspective we therefore do not support this application. The Housing Strategy was adopted by full Council in March 2024. It says "There is no identified need for more… Co-Living Accommodation in Haringey and consequently we do not encourage	Comments noted and addressed at paragraph 6.2.51 of the officer report.

<table>
<tr><td></td><td>these schemes being brought forward where this would be at the expense of conventional housing for which there is a significant demonstrated need. We do not view co-living schemes as a substitute for affordable housing.” The Housing Strategy sets out the evidence for the borough’s significant need for housing, and for affordable housing in particular. The proposals for this site are therefore contrary to the Council’s formal position.

While the Housing Strategy is not a formal Planning document, it expresses the clear and considered strategic position of the Council on housing matters and should be a material consideration in the determination of planning applications. It is for the Local Planning Authority to determine how much weight should be attributed to it in the development management process.</td><td></td></tr>
<tr><td>EXTERNAL</td><td></td><td></td></tr>
<tr><td>TFL</td><td>The applicant’s comments below clarify matters, and re cycle parking and provision, subject to a condition of details of cycle parking and strategy for access to cycle parking (eg use of fobs / passes) in line with LCDS, no further comments from TfL.

RGP HIGHWAS RESPONSE- TFL (Cycle Parking)

RE: 25-27 CLARENDON ROAD, HARINGEY, LONDON - PLANNING REFERENCE HGY/2024/2279

This highways consultation response letter has been prepared by RGP in response to the additional consultation comments received from Transport for London (TfL) in relation to the above planning application.

It is notable that RGP prepared a previous response letter (dated 22nd October 2024) which addressed initial comments from TfL with respect to the cycle parking provision amongst other matters. The additional consultation comments from TfL on cycle parking are summarised below:

<table>
<tr><th>TfL Comments</th><th>RGP Response</th></tr>
<tr><td>For residential that isn’t general residential, for example students or co-living, our recommendation is for 5% wider spaces, 5%</td><td>Support and acceptance of cycle store design Option B noted.</td></tr>
</table>
</td><td>Comments noted conditions Included.</td></tr>
</table>

		Sheffield stands at normal spacing (instead of the 20% for general residential), and the 90% remainder two tier. The reasoning is that among students and co-living residents you don't get children or older people, two of the key groups for which we expect a much higher demand for "more accessible" spaces (but not for larger cycles). *We don't support the provision of folding bikes towards meeting London Plan standards. If an applicant wishes to provide folding bike lockers – which are to be owned by occupants, rather than available for hire or leasing – then that should be in addition to the provision.* *As such – option B – with 89% two-tier, 6% Sheffield stands and 5% larger adaptive cycles, and 0 folding bicycles in numerical terms would be acceptable to TfL.* *I also have further design comments which we have picked up from detailed review of the plans and options:* • *Relying on the access to the cycle store by going along an alley around the back of the building must be considered unacceptable, especially in this location with no overlooking or surveillance and there is the chance that people could easily be followed into the store.*	The cycle store wouldn't rely on access via the rear alley – this access route is necessary for fire safety purposes. Primary access to the cycle storerooms is provided via the northernmost entrance and	

	• *It will need to be clarified if bicycles can be taken through the main lobby and / or via the doors which connect to the bin store and plant / substation and stairs. If a rear door is retained by allowing access from both inside and directly out the back means that there's always going to be the chance that residents will be instructed, perhaps enforced in some way, not to bring their bikes through the main lobby*	through the undercroft area, adjacent to the substation/bin store. There is no requirement for bikes to be brought into the lobby.	
	Assuming access can be provided through the residential lobby, this could be made simpler or improved from the proposed design: • *Access from between the fitness studio and laundry to the first cycle store is via a fire-separation lobby which involves turning the cycle through 90 degrees – it may not be feasible for a standard cycle to do that with the owner alongside it, and you certainly wouldn't be able to get a larger cycle (eg tricycle, cargo cycle) through there* • *The cycle store is subdivided which prevents use of more sensible layouts – we do support providing smaller areas rather than one whole area.* • *There is not the necessary aisle width for the spaces for larger cycles (see LCDS figure 8.1). Assuming access*	There is no requirement for bikes to be brought into the lobby. There is no requirement for bikes to be brought into the lobby. Noted. The bike store has been carefully considered to afford the maximum aisle widths for the larger bike spaces, opposite a central aisle. The bike stores are a bespoke reflection of	

	through the lobby and the first cycle store, the wider spaces at the far end of the second cycle store would need the wider aisle width all the way to them.	the shape and size of this site and have been carefully designed in accordance with the best practice guidance of the LCDS as far as reasonably possible.	
	• *A review of the amount of doors required - getting from the cycle store to the lifts and stairs as designed internally would require going through four sets of internal doors*"	There is no requirement for bikes to be brought into the lobby.	

<table>
<tr>
<td>Health and Safety</td>
<td>
Advice to the local planning authority

Advice to the local planning authority (LPA) from the Health and Safety Executive (HSE) as a statutory consultee for developments that include a relevant building.

<table>
<tr><td>To LPA</td><td>Haringey</td></tr>
<tr><td>LPA planning ref no</td><td>HGY20242279</td></tr>
<tr><td>Our ref</td><td>pgo-5786</td></tr>
<tr><td>Site address</td><td>25-27 Clarendon Road Off Hornsey Park Road, Wood Green, London, N8 0DD</td></tr>
<tr><td>Proposal description</td><td>Demolition of existing buildings and delivery of a new co-living development and affordable workspace, alongside public realm improvements, soft and hard landscaping, cycle parking, servicing and delivery details and refuse and recycling provision.</td></tr>
<tr><td>Date on fire statement</td><td>23/07/2024</td></tr>
<tr><td>Date consultation received</td><td>28/08/2024</td></tr>
<tr><td>Date response sent</td><td>16/09/2024</td></tr>
</table>

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

<table>
<tr><td>Headline response from HSE</td></tr>
<tr><td>Headline Response from HSE ('content')</td></tr>
</table>
</td>
<td>Comments noted.</td>
</tr>
</table>

	Scope of consultation 1.1. The above application relates to the construction of a 9-storey building above ground providing workspace and 222 co-living studios. 1.2. The building contains 9-storeys (plus basement) with a height of 25.3m. 1.3. Co-living communal areas will be present at the Ground, First, and Eighth Floors. 1.4. Regarding the communal areas, paragraph 2.2.3 of the London Plan fire statement states: • 8th Floor lounge • 1st Floor overall Dining / Kitchen / Amenity Terrace area • 1st Floor Cinema and Evening Terrace area: total of no greater than 60 people at any one time. • Ground Floor Workspace 1.5. The fire statement dated 23/07/2024 states that the adopted fire safety design standards are BS 9991 and BS 9999. HSE has assessed this application on that basis. It is noted the fire statement was helpfully detailed and informative. **Consultation** 1.6. Section 7 of the fire statement states: “As the building features residential occupied floors at greater than 18 m above ground level, two common stairs are provided based on the revised ADB1 guidance issued in March 2024.” 1.7 HSE welcomes the provision of two stairs within the building. 1.8. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, HSE has identified some matters as supplementary information, set out below, that the applicant should try to address, in advance of later regulatory stages. **2. Supplementary information**	

	The following information does not contribute to HSE's substantive response and should not be used for the purposes of decision making by the local planning authority. **Fire service access and facilities** 2.1. Section 10 of the fire statement states: "The internal firefighting features are informed by the expectations of BS 9991, including a single firefighting shaft where the building has an area of less than 900 m2 at each floor level above 18m in height..", with paragraph 6.4.2 of the London Plan fire statement stating: "As no floor at greater than 18 m in height exceeds 900 m2, a single firefighting shaft will be provided…" 2.2. Whilst it is acknowledged that the building has a stated floor area of 'less than 900 m2 at each floor level above 18m in height', floor plans appear to indicate that is only slightly less than 900m2. 2.3. This is noted; however, the floor plans also show a travel distance from the firefighting stair to the furthest flat entrance door of approximately 36m. 2.4: For information, the 'Smoke Control Association. Guidance on Smoke Control to Common Escape Routes in Apartment Buildings Flats and Maisonettes' (SCA), states that single direction travel distances over 30m in length (measured from the firefighting staircase door to the furthest flat entrance door) in common escape routes are considered to present onerous conditions for firefighters 2.5. Additionally, the SCA Guidance states: • firefighting from long corridors can present exceptionally onerous conditions for firefighters. • the corridor itself can become the fire compartment once the flat front door is either breached by the fire, opened by escaping residents or by firefighters • charging that hose with water prior to entering the corridor • In our experience, corridor lengths over 30m may simply be too long for safe firefighting operations and we therefore advocate for this limit to be in place.	

	2.6 Furthermore, the same document states: 'Whilst 30m might seem like an arbitrary figure to some, firefighting from long corridors can present exceptionally onerous conditions for firefighters. Essentially, the corridor itself can become the fire compartment once the flat front door is either breached by the fire, opened by escaping residents or by firefighters.' 2.7. However, it is noted that a means of escape staircase (provided with evacuation lift but not designed as a firefighting shaft) is available at the southernmost part of the building. 2.8. In this instance, if the means of escape stair (provided with an evacuation lift) was amended to become a firefighting shaft (provided with a firefighting lift and fire main), this would be unlikely to affect land use planning considerations and would resolve the travel distance issue described above. This will be a matter for the applicant to decide and also to demonstrate compliance at later regulatory stages. **Fire service access / basement access** 2.9. Paragraph 3.5.2 of the London Plan fire statement states: "The plant area at basement level will feature a maximum occupancy of less than 10 people, and a single direction of escape is considered sufficient. The area will have infrequent maintenance access via an access hatch and ladder, meeting the guidance in Section 26 of BS 9991." 2.10. Paragraph 3.5.3 of the same document states: "The sprinkler room and basement plant rooms will be inner rooms to the plant area at Ground floor. This is considered suitable where access via the hatch would be restricted to building management staff, and where automatic detection and alarm would support early warning to the inner rooms. The access room is not considered to be a place of special fire hazard, where equipment in these areas will not featuring combustion processes or flammable fuels." 2.11. Additionally, paragraph 6.5.1 states: "The proposed basement has an area of less than 200 m2. As such and in accordance with Section 14.2.1.3.1 of BS 9991, no means of basement smoke clearance system are expected." 2.12. The above is noted, however, it would appear that the sprinkler room is an inner, inner room. Additionally, HSE advises that consideration is given to fire service access and smoke clearance for firefighting operations – this includes stop valves, which should be installed in	

	readily accessible positions in or near the zone they control. This matter will be for the applicant to decide and also demonstrate compliance at later regulatory stages. **Means of escape / evacuation alert system** 2.13. Paragraph 3.2.9 of the London Plan fire statement states: “An evacuation alert system to BS 8629 [9] is not expected, where full evacuation of the wider building may be initiated using the BS 5839-1 detection and alarm system.” 2.14. This is noted, however, BS 8629 (Introduction) states: “It is important that evacuation alert systems for use by the fire and rescue service are not confused with (or integrated with) fire detection and fire alarm systems. It is acknowledged that the technology exists to provide the evacuation alert systems to which this British Standard refers within a fire detection and alarm system which might be present to support other safety functions, such as smoke control. However, the reason for the avoidance of such an integrated arrangement within the recommendations of this British Standard is to avoid confusion between fire and rescue service evacuation alert systems and fire detection and alarm systems until the concept, use and management of the former systems is well established and understood. Such confusion could result in inappropriate use of fire detection systems in blocks of flats, so undermining a stay put strategy and resulting in incorrect programming of integrated systems. It is intended that, given that evacuation alert systems are a new form of system, not commonly used within the UK, this British Standard will be reviewed two years after its publication, at which time the recommendations for avoidance of any integration with other systems will be reviewed.” 2.15. Whilst, in this instance, this matter is unlikely to affect land use planning considerations, it will be for the applicant to demonstrate compliance at later regulatory stages. **Means of escape / Internal layout of flats** 2.16. Paragraph 3.3.2 of the London Plan fire statement states: “Cooking facilities are to be situated away from the flat entrance door(s) and internal escape routes. It is recommended that a distance of at least 1.8 m be provided between the cooking appliance at escape route, In the event that narrower escape routes should be present, these would be subject to discussions with the authorities having jurisdiction regarding suitable measures to mitigate fire risk during cooking. Risk mitigation measures that may be considered would include:	

	• Use of smaller (two ring) induction hobs with automatic timers. • Inclusion of automatic cut-offs linked to the fire detection system. • Provision of fire blankets. • Provision of hob suppression." 2.17. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages. **Means of escape/workspace** 2.18. The ground floor plan shows: "Note: Workspace fitout not shown, to be divided into compartments 2.19. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.	

London Healthy Urban Development Unit	**Dear Valerie HGY/2024/2279 – Clarendon Road** **Demolition of existing buildings and delivery of a new co-living development and affordable workspace, alongside public realm improvements, soft and hard landscaping, cycle parking, servicing and delivery details and refuse and recycling provision** **HUDU Response to Haringey Planning Application** Haringey GPs, primary care services are under substantial pressure with limited space and recruiting/retaining additional clinicians, e.g., pharmacists and physiotherapists, to provide enhanced services to local people. Additionally, more residents means greater pressure on acute and mental health services. To meet the health needs of the new residents of the proposed schemes, and to limit adverse impacts on existing residents, developments need to provide financial contributions via the relevant S106 agreement for the expansion of health infrastructure serving the locality. NCL acknowledges that additional healthcare provision is needed in the area, particularly GP primary care services. The NHS Long Term Plan (2019) and the Fuller Stocktake Report (2022) re-emphasise the importance of providing care close to the community and to provide services on a neighbourhood basis where possible. This means in addition to increasing and improving primary capacity NHS Trusts are seeking to provide increased facilities and services locally where appropriate. The HUDU Planning Contributions Model, as set out in the 2021 London Plan, is required to be used to calculate the cost of mitigation for health. (please note that the HUDU Model does not currently incorporate the impact on Accident and Emergency and outpatient infrastructure nor the impact on the London Ambulance Service and therefore underestimates the cost of mitigation to the NHS). The proposal is for 222 co-living apartments. This number of new units would have an impact on health provision. The HIA submitted with the application acknowledges that the GP surgeries surrounding the site are acting above capacity. However, no mitigation is proposed. It is noted that the Hornsey Wood Green GP practise on Turnpike Lane is in close proximity to the site. Currently this GP surgery has 10,400 patients being seen in very poor and inadequate	Comments noted/ addressed in section 6.15 of the officers report.

accommodation. There is no potential to expand or improve the space so it is an ICB priority is to facilitate an alternative premises for this practice. Any S106 secured from this development would primarily be directed towards this aim.

Also, in accordance with the aims of the ICB there is a need for a new integrated hub in the Wood Green Area and it is hoped that sufficient funding will become available in the future to provide this which could also accommodate the Hornsey Wood Green practise. The timescale of the planning application and build rate are not fixed and the needs of the NHS may change over time, in which case the contribution would be used for other means, therefore a flexibly worded s106 agreement would be needed to reflect this.

Whilst health and wellbeing facilities are included on the Strategic Community Infrastructure Levy Infrastructure List, the list is indicative and there is no guarantee that CIL receipts will be allocated towards health infrastructure in the Wood Green area to mitigate the direct impact of development. Therefore HUDU maintain that a s106 payment is required.

The HUDU Planning Contributions Model has been used the calculate the contribution. The requirement would meet the tests in CIL Regulation 122 as it is considered necessary, reasonable and directly related to the development.

We have run the HUDU model for this based on 222 additional units based on the unit sizes contained within the Planning Statement accompanied with the application.

Final Summary	
Total Capital Cost	£444,988
Total Revenue Cost	£408,126
Combined Cost	£853,114
Total Number of Housing Units	222
Capital Cost Requirement Per Unit	£2,004

	The HUDU Planning Contributions Model calculated a total healthcare requirement of £853,114 for this development. This shows an overall capital cost of £444,988 with a further revenue cost of £408,126 The capital cost can be further broken down into primary, acute mental health and intermediate services At this stage we are not asking developers to cover the additional revenue costs. However, they should be made aware that there are significant pressures and costs on the NHS of development. The capital cost can be further broken down. Primary care - £155,802 Acute - £208,670 Mental Health - £80,517 As stated above there is an urgent need to expand and improve primary care in the area and therefore the request is the Council to secure **£155,802.** within the S106 agreement to be paid on commencement and indexed linked to building costs. I trust that the above comments are useful in pursuing the application. However, please contact me if you require any clarification or if I can be of further assistance. We would request that we are consulted on any further amendments to the scheme which may effect primary and acute care provision and on any subsequent planning applications on the site and, as stated above, would welcome any involvement regarding the negotiation of the s106 contribution. Yours Sincerely	

Metropolitan Police Designing Out Crime Office	**Application Number:** HGY/2024/2279 **Location:** 25-27 Clarendon Road Off Hornsey Park Road, Wood Green, London, N8 0DD **Proposal:** Demolition of existing buildings and delivery of a new co-living development and affordable workspace, alongside public realm improvements, soft and hard landscaping, cycle parking, servicing and delivery details and refuse and recycling provision. Dear Haringey Planning, ***Section 1 - Introduction:*** Thank you for allowing us to comment on the above planning proposal. With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1). I can confirm we have met with the project design team to review Safety, Security or Crime Prevention. We have concerns around some aspects of the design and layout of the development. At this point it can be difficult to design out fully any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences. Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated	Comments noted, conditions and informative included.

	early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to. **Please provide my details to the applicant so we can discuss and address our concerns.** ***Section 2 - Secured by Design Conditions and Informative:*** Should planning consent be granted for this application, we would request the following conditions and informative: **Conditions:** A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable according to current and relevant Secured by Design guidelines at the time of above grade works of each building or phase of said development. The development shall only be carried out in accordance with the approved details. B. Prior to the first occupation of each building, or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained. Reason: In the interest of creating safer, sustainable communities. **Informative:** The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk.	

Section 3 - Conclusion:

We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.

Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.

Yours sincerely,

Ian Waylen 1973CO
Designing Out Crime Officer
Metropolitan Police Service

Appendix 1: Concerns and Comments

In summary we have overall site specific comments in relation to the following items. This list is not exhaustive and acts as initial observations based on the available plans from the architect and local authority planning portal.

Site specific advice may change depending on further information provided or site limitations as the project develops:

This list is not exhaustive and acts as concerns raised during consultation with the architects preapplication

Site specific advice may change depending on further information or site limitations as the project develops

To be utilised in further discussions with the appointed developer at a later stage.

	Boundary Treatment • Ideally side and rear boundary onto the public realm should be 2.4m (potentially 1.8m with 600mm trellis or 2.1m with a 300mm trellis). Any vertical transom (support) should be inward facing • Metal fabrication, should be robust, have an unfinished top rail (exposed tops), to deter loitering, sitting and climbing. We recommend 358 gauge weld mesh fence panels • If fencing is constructed of wood material, ensure panels are vertical with no support beams allowing climbing opportunities. Panels to be mechanically secured in place to prevent lift removal • All perimeter railings to have a maximum 50mm spacing centre to centre, be set flush to the front of any wall. If strengthened with mid rail must be designed to deter climbing and mid rail to be inward facing. Any perimeter boundary treatment (railings) should be between 1. 8m - ideally designed to provide visual permeability • Gates to be designed level to the front building line, any locking mechanism, hinges to be anti-climb and fitted with a dampened stop. Gating to be inclusive of a selfcloser and the same height as the perimeter treatment including any trellising • Where possible building lines should be flush to allow natural surveillance, any recesses should not exceed 600mm • If anti-climbing measures are introduced then signage should be used to comply with occupier's liability Act 1984 • Any boundary treatments should be UKAS certified as recommended by a DOCO • All low defensive wall/railings to be designed to deter sitting, loitering and climbing. **Access Control** • Doorset preferred locking mechanism is Magnetic locks (Communal areas) - 2 x 500kg (minimum) resistance (1200lbs/psi) placed a third from the top and a third from the bottom • Key fob access control with a data logging system is recommended as this is more efficient to deactivate/replace lost/stolen keys. It can also assist with identifying any misuse • Data to be stored for one calendar month before being over written • Access control panels to have audio/visual capability. Primary camera on panel to capture all visitors. They should achieve the Secured by Design required standard – UL293 (anti-vandal).	

	• No Trade Button on control panel.
	• Emergency Exit (push to release) primary egress routes that are required to have an emergency escape mechanism should be self-resetting, shrouded and in best practice to be alarmed
	• Plant/Service room door set/s accessible by public realm are required to be one of the following UKAS certified products:
	  ○ LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or
	  ○ STS202 Issue 3:2011 BR 2+ or
	  ○ LPS2081 SRB or Equivalent certification
	• Consideration required regarding the security/risk management to Internet Of Things (IOT)
	
	Note: Service/plant door/s should be self-closing, self-locking single doors.
	
	ACB (Access Control Box) / Fire Access
	• An external fire over ride switch (FOS) should be protected with the use of an accredited security product such as a Gerda Box. Consideration to other suppliers of this type of fire switch protection method should be given, check SbD web site. In addition to the use of an ACB see below re Premises Information Box (PIB). https://www.gerdasecurity.co.uk/access-control-protection-acb-gfs/
	• Premises information box (PIB) typically used to store site specific documentation such as communal access routes, fire risers etc. PIB is generally located behind the primary security layer and is intended for LFB use only (Refer to current Homes guidance)
	• If the cause and effect of a fire over ride switch (FOS) activation poses a crime risk consideration to a Drop Key Protection Box should be made
	• The project fire consultant should be made aware of any Part B Security v's Safety conflicts.
	
	Doors
	• External communal door set/s should be flush with the building line to prevent any recesses. Any recesses should not exceed 600mm. Doorset/s should be certified to:
	  ○ LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or
	  ○ STS202 Issue 3:2011 BR 2+ or
	  ○ LPS2081 SRB or Equivalent certification Fabricator 3rd party UKAS certification	

	• We recommend that customer / communal entrances have a secure lobby area to provide adequate security for staff / customers. The secondary lobby door set/s that are required to be dual certified to the following minimum standards:
	  o LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or
	  o STS202 Issue 3:2011 BR 2+
	  o or o LPS2081 SRB or Equivalent certification Fabricator 3rd party UKAS certification
	• Part B Fire resistance must be taken into Consideration for the door
	
	Note: Communal door/s should be self-closing, self-locking single doors
	
	Windows
	• All easily accessible windows (anything under 2m from another surface treatment) should be certificated to either:
	  o PAS24:2022 with BS EN356:2000 min.P4A glazing o STS204 Issue 6:2022, o STS202 Issue 7:2016 Burglary Rating 1
	  o LPS1175 Issue 7.2:2014 Security Rating 1 or
	  o LPS1175 Issue 8:2018 A1 Security Rating 1 or
	  o LPS 2081 Issue 1.1:2016 Security Rating A.
	
	Accessible windows includes any glass reached by climbing any number of floors via rain water pipes, balconies or via communal walkways (whether walkway accessed through secure door or not)
	• Any window within 2m of an accessible surface should have key operated locks
	• Where windows form an escape route, Part B (Fire) compliance should be adhered to
	• All ground floor, vulnerable and accessible windows must have a lockable window restrictor to prevent unauthorised access
	• Where curtain walling systems are proposed these should be certificated to either:
	  o LPS1175 SR2
	  o BS EN1627 RC3. (With minimum of BS EN356:2000 P4A Glazing)
	  o PAS24:2022 with BS EN356:2000 min. P2A glazing (consider P3A). Commercial windows to have a minimum of P4A glazing.
	
	Note: Curtain wall systems are non-structural cladding systems for the external walls of buildings. Typically curtain wall systems comprise a lightweight aluminium frame onto which	

	glazed or opaque infill panels can be fixed. These infill panels are often described as 'glazing' whether or not they are made of glass. **Refuse Storage** • Ideally should not allow access into the building from the refuse store • Street access doors to be single leaf and either o LPS1175 SR2 or o STS202 BR2/B3 • Doors to be single leaf (available up to 1500mm that facilitate 1100cc bins in LPS and STS), self-closing and self-locking with access control, ideally using magnetic locks to the previous documented standard. (2 x 500kg resistance (1200lbs/psi) positioned 1/3 from the top and 1/3 from bottom) • If louvre doors are used, these should be of robust construction (ideally steel) supported with a layer of steel mesh to the rear to prevent unauthorised access to the locking mechanism and prevent general misuse • A suitable level of lighting to be present within store, ideally low level at times of inactivity and full level illumination when in use. To compliment any CCTV. External lighting to be Dusk to Dawn covering door set • No external signage identifying the refuse store • CCTV should cover the refuse store and avoid positions that would restrict coverage. **Note**: Single leaf doors are available up to approx. 1500mm to and will facilitate 1100cc bins in LPS and STS. This will eliminate the weakness of the passive leaf manually operated locking system which leaves double doors more vulnerable. **Cycle storage** • Internal access doors to be ether: o LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or o STS202 Issue 3:2011 BR 2+ or o LPS2081 SRB or Equivalent certification Must be single leaf, self-closing and self-locking with access control ideally using magnetic locks • Cycle storage lighting is required in all stores. In areas of no natural light or hours of darkness, a constant level of lighting is required for illumination. Connected lighting to provide low level lighting during inactivity and higher light levels when motion is detected • No external signage	

	• CCTV must be installed in cycle stores. Should have unhindered views of the racking at all times and should be vandal resistant
	• There should be 3 locking points for cycles on the racks/stands provided. Cycle racking should be secured with anti-tamper fixings
	• Cycle store doors should allow light spill from with-in, either a small obscured viewing panel or robust louvre (as part of the door set)
	• Internal signage should ideally be placed inside the store to reinforce importance of securing cycles
	• If timber storage/sheds are to be used, then these must be of robust construction and designed to the SbD guidance (Sec 64). Requires at least 2 points of locking on the main door. If items of value are to be stored within the shed then a security anchor should be certificated to 'Sold Secure' Silver Standard LPS 1175 Issue 7.2:2014 Security Rating 1 or LPS 1175 Issue 8:2018 Security Rating A1
	• Any Sheffield stands should be low level and shaped like the letter 'm', to deter people from sitting on them. The stands must be located in an area with good natural surveillance and tamper proof fixings used, to mitigate against theft or criminal damage
	
	CCTV / Alarm
	• Any alarm installed should meet BS EN 50131 (as minimum)
	• CCTV systems should conform to BS EN 62676: 2014 - video surveillance systems.
	• CCTV should complement other security measures, not replace them. As a minimum police recommend coverage of the following areas:
	  ○ Entrance & exit points including secondary coverage of call points
	  ○ Foyer / Lobby areas Post boxes and Postal rooms
	  ○ Cycle stores
	  ○ Refuse stores
	  ○ Top of stair cores
	• Image quality should be able to provide facial recognition and colour HD quality during daylight and night time
	• CCTV housing to be anti-vandal and potentially shrouded. Signage highlighting use of CCTV should displayed throughout the development
	• Footage should be preserved for a minimum of 31 days	

	• The footage must be of evidential values and stored for a minimum of 31 days. All footage to be time and date stamped and recorded in a format that is accessible to the local authority and police • Any CCTV system that captures footage of public areas must comply with the regulations outlined by the Information Commissioner's Office • To be stored securely on a remote cloud system, or on a locked and secured hard drive i.e. within a secure area behind a PAS24:2022 door or SR1 lockable steel cabinet • Police access to footage must be within a minimum of 24 hours and a maximum of 48 hours for evidential purposes. **Postal Strategy** Due to crimes associated with letter plate apertures, such as Arson, Hate Crime, Lock Manipulation & fishing, Secured by Design strongly recommends where possible, mail delivery via a secured lobby, letter box TS009. It would be advised that all post is delivered into an airlock (preferred) or through the wall to reduce the likelihood of tailgating and postal theft. Through the wall letter plates should incorporate a sloping chute and anti-fishing attributes to mitigate against mail theft and meet TS008 standard. If post is to be delivered into an airlock then these should be securely surface mounted and meet TS009 standard. Mailboxes should be covered by CCTV and meet TS009 standards or MPS robust mailbox specification below: • A minimum of 1.5mm thick galvanized steel construction. Its depth and width must allow mail to fall below the fishing plate unrestricted • Fitted with a 3-point locking mechanism supported with a minimum five pin cam lock • BS EN 1303:2005 (Inc corrigendum Aug 2009) compliant five/six pin camlock must have anti-drill, anti-bump and anti-pick lock attributes • Gap restricting aperture (anti-fishing max 260mm x 40mm) The anti-fishing plate must be fabricated as part of the post box construction and extend into and across the full length of the letterbox opening to defend against the interference of mail, anti-leverage surrounding trim, welded claw on retrieval door to negate the ability to gain a leverage point and compromise the security of the mailbox • Unit to have a minimum of 13Ltrs storage. **Lighting**	

	• Public realm lighting whether adopted highways/footpaths/private estate roads or car parks should meet BS 5489:2020 standard
	• Declaration of conformity should be overseen by an independent and competent lighting engineer. They should be qualified to at least ILP Level 3 or 4 in line with the latest SBD guidance. https://theilp.org.uk/
	• Internal lighting Communal elements of any scheme, ideally should be a controlled by a photo electric sensor. This to ensure suitable levels of lighting at all times. Where no natural light is available two phased lighting can be used (low level for nonactivity, higher level once movement is detected)
	• Lux is the measurement of light reaching a surface (1 lux is the light emitted from one candle that is 1m away from a surface 1sqm). Examples of suitable Lux levels are listed below:
	  ○ Office interior (security) 05 Lux
	  ○ Private car parks 10 Lux
	  ○ Exterior Rural location 10 Lux
	  ○ Exterior Urban location 20 Lux
	  ○ Walkways 30 Lux
	  ○ Loading bays 50 Lux
	Further guidance is available in the “Lighting against crime” manual
	
	• The even distribution of light across the area being illuminated. A good lighting system is one designed to distribute an appropriate amount of light evenly with uniformity and should include the following:
	  ○ Values of between 0.25 and 0.40
	  ○ Using lamps with a rating of at least 60 (minimum) on the Colour Rendering Index.
	  ○ Good lighting will use energy efficient lamps in suitable luminaries
	• Dusk-Till-Dawn lighting where possible should consist of white light which is evenly distributed. In communal areas all entrances should have dusk till dawn lighting supported via a photo electric cell. Allowing lighting to controlled automatically
	• Bollard lighting shall be avoided due to its history of vandalism and ease of covering. Up lighters and decorative lighting can be used but only in unison with columns providing the required standards of light for good clear facial recognition illumination
	Climbing Aids	

	• It is recommended that any climbing aids such as balconies, canopies, protruding brickwork/cladding etc., should not be positioned near any windows/doors and fixed flush with the building/boundary. This will mitigate against burglaries and domestic violence perpetrators. • Canopies above entrances should be avoided to deter rough sleepers or the concealment of any perpetrators from misusing this area. If canopies are used then the depth must be below 600mm and they must be non-load bearing. If any canopy isrobust enough to withstand a person standing on top, all nearby windows will be classed as vulnerable and therefore will be required to be PAS24:2022 P2A. • Any drain/rain pipes should ideally be internally installed. External drain/rain pipes should be of square design and sit flush against the building to prevent them being used as a climbing aid. They should be located away from any windows or balconies. **Roof Access** AOV's should not be restricted from working, however can be reinforced potentially with fixed grille or railing (LPS 1175 SR1) to prevent unauthorised access • Easily accessible roof lights should be a one of the following standards: o PAS24:2022 or o STS 204 (issue 6: 2016) or o LPS1175 (issue 7: 2014) SR1 or o LPS1175 (issue 8: 2018) SR1 / A1 or o STS202 (issue 7: 2016) BR1 or o LPS2081 (issue 1.1: 2016) SR A • • If roof door access is required for “maintenance only” the door should be PAS24:2022 as a minimum. This door should be secured ideally with a key. However, access control can be used in conjunction with a recommended locking mechanism and must be restricted to maintenance staff only. **Note - There are further concerns that need to be discussed with the applicant.** **Lithium Ion Battery Devices and Vehicles Disclaimer** This development / application has cycle storage facilities and / or areas that may require the charging and storage of Lithium-ion powered vehicles or devices, within the building or the wider site footprint. The developer or developer’s agent must be aware that it is their responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of these	

	storage facilities and areas, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion products have been considered and specified. The LFB guidance on this matter can also be passed to partners who ask for additional guidance. https://www.london-fire.gov.uk/media/8064/gn_103-charging-and-storage-for-electricpowered-personal-vehicles.pdf **Appendix 2: Planning Policy** **London Plan 2021** **Policy D11: Safety, Security and Resilience to Emergency** This policy links design out crime, counter terrorism prevention measures and acknowledges fire safety issues. **Section B of policy D11** Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans. **Section C of policy D11** These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. The policy considers not just crime, but also a wide range of hazards, such as fire, flood, extreme weather and terrorism. New buildings should therefore be resilient to all of these threats. **Paragraph 3.11.3** Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the	

	principles contained in guidance such as the Secured by Design Scheme published by the Police…. This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one. **Paragraph 3.11.4** The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised. **Paragraph 3.12.10** Fire safety and security measures should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and means of escape or access of the fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues. **DMM4 (Policy DM2) Part A(d) "Have regard to the principles set out in 'Secured by Design'"** **DMM5: Para 2.14 -** "Proposals will be assessed against the principles of secured by design'. The latest published guidance in this respect should be referred." **An Independent Sustainability report by AECOM on Tottenham area action plan states:** *"Crime is high in Tottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly associated with Northumberland Park and Tottenham Hale".* *12.3 of same report states:* • Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduce levels of crime, fear of crime and anti-social behavior. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development. • There are no references to crime in the overarching policies, although it is recognised that housing and economic polices aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term	

through creating more high quality environments and more stable communities. AAP 06 includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places.

- There are no references to crime in the neighbourhood area sections; however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard. Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated.
- In conclusion, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest.

The Supplementary Planning Documents 'Designing Safer Places' and 'Landscaping' provide further additional guidance supporting the recommendations.

• **Section 17 of the Crime and Disorder Act 1988 states** "It shall be the duty of each Authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on and the need to do all it reasonably can to prevent Crime and Disorder in its area", as clarified by PINS953.

• **The National Planning Policy Framework (NPPF)**

"Planning policies and decisions should aim to ensure that developments create: Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion."

Appendix 3: Crime Figures

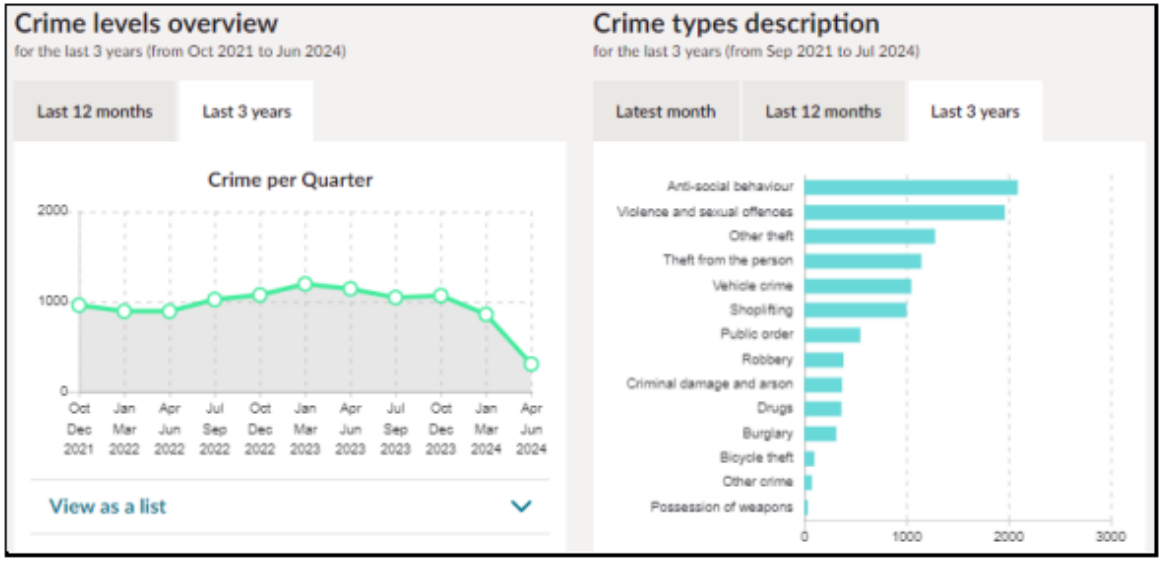
The crime figures provided below are publicly available on the Internet at http://www.met.police.uk/. The figures can at best be considered as indicative as they do not

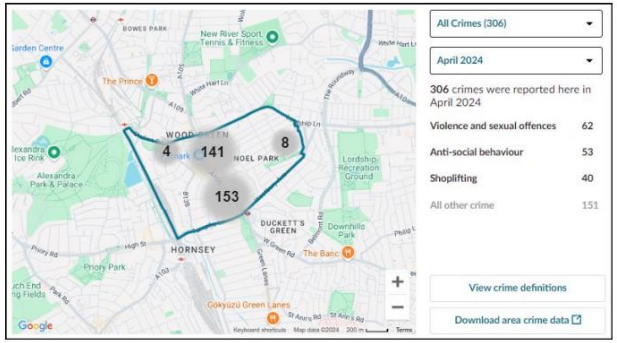
include the wide variety of calls for police assistance which do not result in a crime report. Many of these calls involve incidents of antisocial behaviour and disorder both of which have a negative impact on quality of life issues.

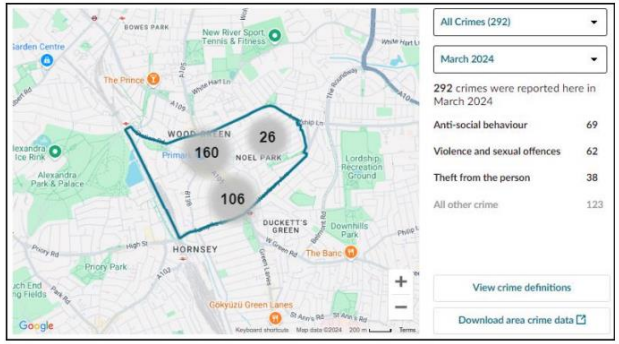
Haringey is one of 32 London Boroughs policed by the Metropolitan Police Service. It currently has crime figures above average for the London Boroughs and suffers from high levels of crime and disorder to its residents and business communities.

The following figures relate to recorded crime data from Police.uk for the below area:

Noel Park ward







The most commonly reported crimes on this ward during April 2024 are: Violence, Anti-Social behaviour and Shoplifting. The crime levels over the last few months have remained at a similar level. These crime types are also the most commonly reported crimes over the last 36 months.

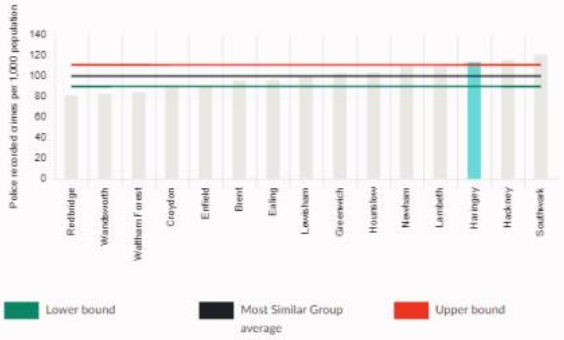
Crime in Haringey compared with crime in similar areas

In the year ending December 2023, the crime rate in Haringey was higher than the average crime rate across similar areas.

Edit crime type

All Crime

Update



The red and green lines show how far the crime rate would normally vary from the average. Haringey lies above the red line, so its crime rate is higher than normal for the group.

About this chart

This chart compares the crime rate in your local area to the average crime rate across similar areas. It shows the total number of crimes over a twelve month period per thousand residents, for the crime type selected.

Where your area lies in relation to the red and green lines is more important than its rank among similar areas. If your area lies between the red and green lines, its crime rate is normal for the group. If your area lies above the red line, its crime rate is higher than normal for the group, and similarly, if your area lies below the green line, its crime rate is lower than normal.

The areas shown in this chart are those that have been assessed to be most similar to your own. However, the circumstances within these areas do still vary and these variations can have an impact on the crime rates observed.

Source: ONS

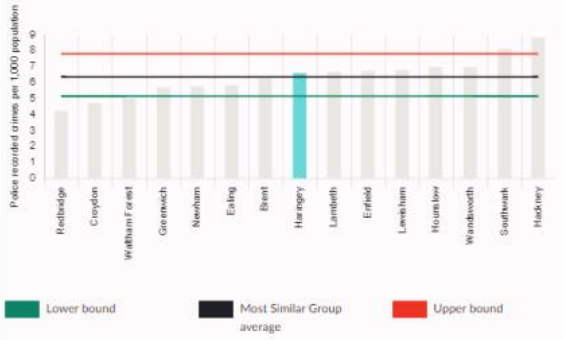
Crime in Haringey compared with crime in similar areas

In the year ending December 2023, the burglary rate in Haringey was about the same as the average burglary rate across similar areas.

Edit crime type

Burglary

Update



The red and green lines show how far the burglary rate would normally vary from the average. Haringey lies between the red and green lines, so its burglary rate is normal for the group.

About this chart

This chart compares the crime rate in your local area to the average crime rate across similar areas. It shows the total number of crimes over a twelve month period per thousand residents, for the crime type selected.

Where your area lies in relation to the red and green lines is more important than its rank among similar areas. If your area lies between the red and green lines, its crime rate is normal for the group. If your area lies above the red line, its crime rate is higher than normal for the group, and similarly, if your area lies below the green line, its crime rate is lower than normal.

The areas shown in this chart are those that have been assessed to be most similar to your own. However, the circumstances within these areas do still vary and these variations can have an impact on the crime rates observed.

Source: ONS

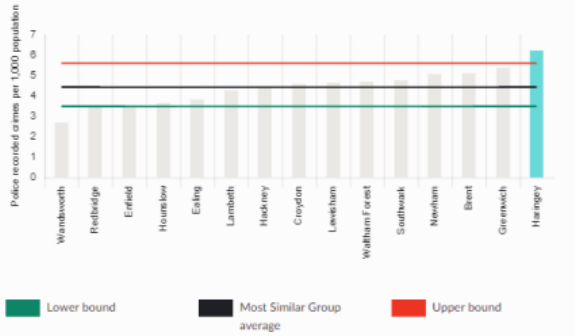
Crime in Haringey compared with crime in similar areas

In the year ending December 2023, the drug offence rate in Haringey was higher than the average drug offence rate across similar areas.

Edit crime type

Drugs

Update



The red and green lines show how far the drug offence rate would normally vary from the average. Haringey lies above the red line, so its drug offence rate is higher than normal for the group.

About this chart

This chart compares the crime rate in your local area to the average crime rate across similar areas. It shows the total number of crimes over a twelve month period per thousand residents, for the crime type selected.

Where your area lies in relation to the red and green lines is more important than its rank among similar areas. If your area lies between the red and green lines, its crime rate is normal for the group. If your area lies above the red line, its crime rate is higher than normal for the group, and similarly, if your area lies below the green line, its crime rate is lower than normal.

The areas shown in this chart are those that have been assessed to be most similar to your own. However, the circumstances within these areas do still vary and these variations can have an impact on the crime rates observed.

Source: ONS

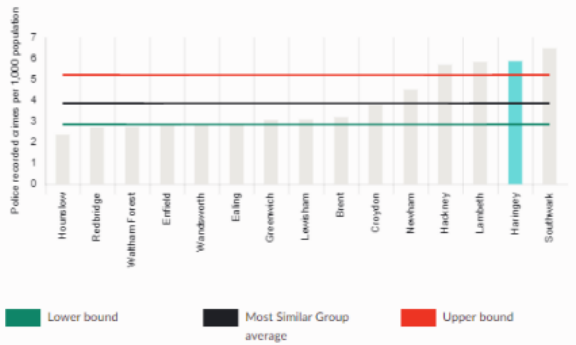
Crime in Haringey compared with crime in similar areas

In the year ending December 2023, the robbery rate in Haringey was higher than the average robbery rate across similar areas.

Edit crime type

Robbery

Update



The red and green lines show how far the robbery rate would normally vary from the average. Haringey lies above the red line, so its robbery rate is higher than normal for the group.

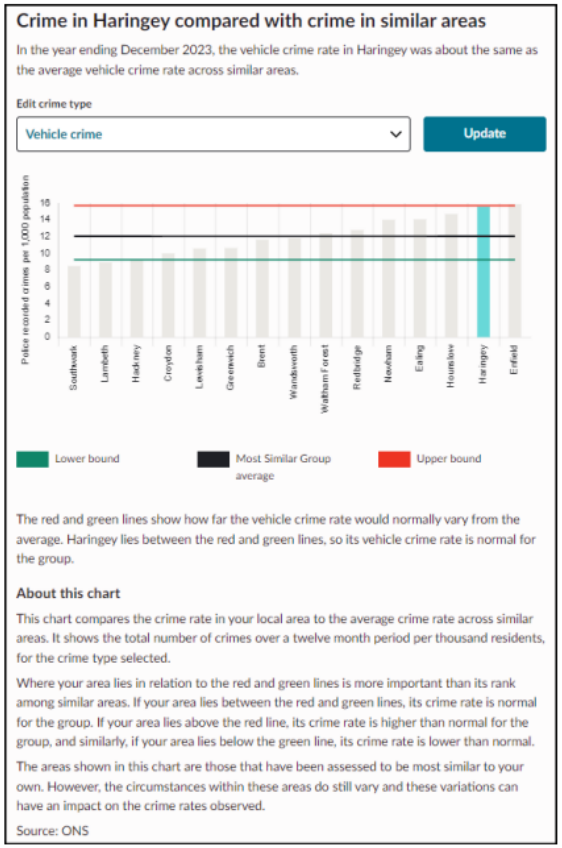
About this chart

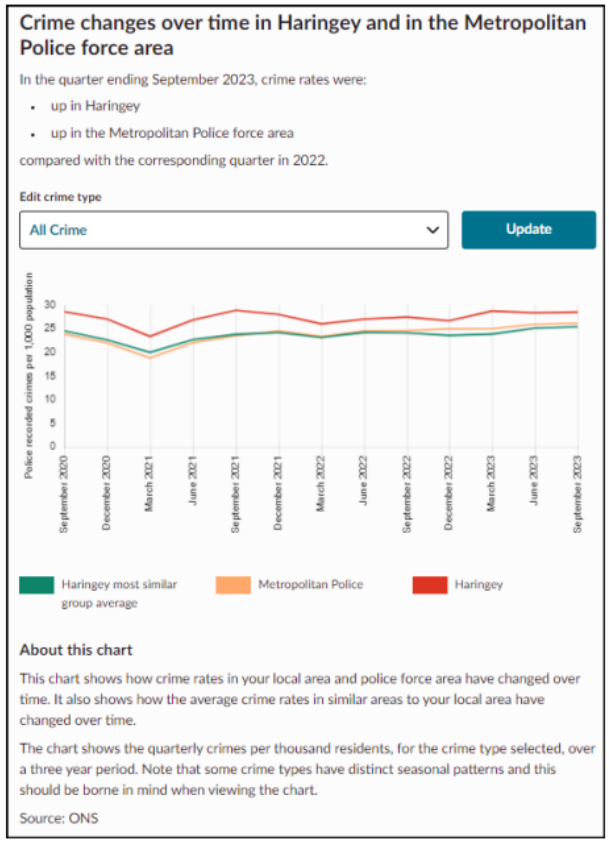
This chart compares the crime rate in your local area to the average crime rate across similar areas. It shows the total number of crimes over a twelve month period per thousand residents, for the crime type selected.

Where your area lies in relation to the red and green lines is more important than its rank among similar areas. If your area lies between the red and green lines, its crime rate is normal for the group. If your area lies above the red line, its crime rate is higher than normal for the group, and similarly, if your area lies below the green line, its crime rate is lower than normal.

The areas shown in this chart are those that have been assessed to be most similar to your own. However, the circumstances within these areas do still vary and these variations can have an impact on the crime rates observed.

Source: ONS





- **Police.Uk provides open source crime data, please see the Home Office crime classifications below as depicted on the Police.uk web site keeping in mind that not all crime takes place in the public realm.**

All crime: Total for all categories
Anti-social behaviour: Includes personal, environmental and nuisance anti-social behaviour.
Bicycle theft: Includes the taking without consent or theft of a pedal cycle.

	Burglary: Includes offences where a person enters a house or other building with the intention of stealing. **Criminal damage and arson:** Includes damage to buildings and vehicles and deliberate damage by fire. **Drugs:** Includes offences related to possession, supply and production. **Other crime:** Includes forgery, perjury and other miscellaneous crime. **Other theft:** Includes theft by an employee, blackmail and making off without payment. **Possession of weapons:** Includes possession of a weapon, such as a firearm or knife. **Public order:** Includes offences which cause fear, alarm or distress. **Robbery:** Includes offences where a person uses force or threat of force to steal. **Shoplifting:** Includes theft from shops or stalls. **Theft from the person:** Includes crimes that involve theft directly from the victim (including handbag, wallet, cash, mobile phones) but without the use or threat of physical force. **Vehicle crime:** Includes theft from or of a vehicle or interference with a vehicle. **Violence and sexual offences:** Includes offences against the person such as common assaults, Grievous Bodily Harm and sexual offences. *This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.* *We strongly advise that independent third party certification is obtained from a manufacturer to ensure the fire performance of any of their door sets in relation to your needs and to ensure compliance with both current Building Regulations and the advice issued by the Department for Communities and Local Government on 22nd June 2017 following the Grenfell Tower Fire*	

Thames Water	Waste Comments Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Water Comments Thames Water are currently working with the developer of application HGY/2024/2279 to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve 16 dwellings but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the 16 dwelling until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues." Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.	Comment noted and conditions included

	There are water mains crossing or close to your development. Thames 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://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes 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. The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at https://www.gov.uk/government/publications/groundwater-protection-position-statements) and may wish to discuss the implication for their development with a suitably qualified environmental consultant. The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground	

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

London Underground Infrastructure Protection	I can confirm that London Underground Infrastructure Protection has no comment to make on this planning application. This site is adjacent to Network Rail assets. Please contact them directly to query what affect, if any, the proposals will have on their railway. This response is made as TfL Railway Infrastructure Manager under the “Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.	Comments noted.

Stakeholder	Questions/Comments	Response
NEIGHBOURING PROPERTIES	Comments in objection: • Non compliance with the master plan • Lack of public engagement	The proposal is considered to align with the masterplan. The statement of community involvement summarises the applicant's public engagement regarding the proposal which is proportionate to the scheme. The consultation process was adequate consisting of a DM Forum where residents were invited ; the scheme was presented to members in a public forum at

		pre-application stage. Once the application was submitted, the Council consulted residents by letter, The application was able to be viewed on the council's website)
	• Impact on light and the efficiency of installing solar panels on neighbouring buildings	Whilst the proposal may reduce the efficiency of potential solar panel installations on neighbouring sites, the public benefits of the proposal is considered to outweigh the harm.
	• The proposal is contrary to Haringey's net zero ambitions	Officers are satisfied, subject to compliance with the

	• The scale of the development and its impact on right to light • Traffic disruption • Security concerns	recommended conditions, that the proposal accords with the sustainability policies in the development plan. Officers consider that the proposal would have acceptable amenity impacts as set out in section 6 of the officer report. Officers are satisfied that the proposal would not have a significant adverse highway impact as set out in the report. The design and layout of the development has sought to improve

	• Concerns about co-living policy Comments in support: • Economic benefits • Need for co-living in the borough	security. The Secure By Design Officer has not objected to the development subject to conditions to secure compliance with secured by design principles. Officers are satisfied that the proposed co-living units make a positive contribution to housing mix and choice in the locality. Officers note the economic benefits that the scheme would deliver and the need for co-living units.