

## REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

### 1. APPLICATION DETAILS

**Reference No:** HGY/2020/2794

**Ward:** Seven Sisters

**Address:** Land to the North of Ermine Road N15

**Proposal:** Temporary planning permission for a period of 7 years to provide 38 modular residential homes for use as accommodation for people who have been street homeless, with associated cycle and refuse storage.

**Applicant:** Hill Residential

**Ownership:** Council

**Case Officer Contact:** Philip Elliott

**Site Visit Date:**

**Date received:** 06/11/2020 **Last amended date:** 21/12/2020

1.1 This application has been reported to Planning Sub Committee as it is a major application on Council owned land, and significant material planning objections have been received during the consultation process.

#### 1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- There is a significant need for homeless accommodation in Haringey, and this proposal provides 37 units of temporary accommodation specifically designed to meet the needs of people who have experienced homelessness. It would improve the life expectancy of residents and reduce the financial costs of temporary accommodation to the Council.
- The proposal would provide much needed temporary accommodation for 37 Haringey residents that have experienced homelessness;
- The modular construction enables the proposed homes to be built quickly so that interventions can be made as soon as possible to help those in need;
- The proposal would make a positive contribution to Ermine Road, improving the character of this vacant site.
- The proposed development would preserve the setting of the nearby Seven Sisters/Page Green Conservation Area and would have an acceptable appearance from within the Conservation Area and the locally listed Dutch House.

- There would be no material impact on parking in the area. Impacts on nearby properties would be suitably mitigated.

## 2. RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management is authorised to issue the planning permission and impose conditions and informatives

**Conditions** (the full text of recommended conditions is contained in Appendix 1 of this report)

- 1) Temporary Permission
- 2) Approved Plans
- 3) Materials as indicated on approved plans
- 4) No Parking Permits for New Residents
- 5) All Parking Delivered as Approved
- 6) Construction Management/Logistics Plan
- 7) Energy Strategy
- 8) Carbon Offset Contribution
- 9) Land Contamination
- 10) Unexpected Contamination
- 11) CEMP
- 12) Drainage / Flooding (FRA)
- 13) Provision & Retention of SuDS
- 14) No Light Spill into SINC (Bats)
- 15) Tree protection (SINC/Bats)
- 16) Waste storage delivered and made accessible
- 17) Secured by Design
- 18) Culvert Protection

### Informatives

- 1) Co-operation
- 2) CIL liable
- 3) Hours of construction
- 4) Party Wall Act
- 5) Street Numbering
- 6) LFB
- 7) Thames Water Surface drainage
- 8) Thames Water Pressure
- 9) Thames Water Groundwater Risk Management Permit
- 10) Thames Water Within 15m
- 11) Crossrail 2 Safeguarding
- 12) Designing Out Crime

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## **3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS**

### **3.1 Proposed development**

- 3.1.1. Planning permission is sought for three (3) two-storey modular buildings (Blocks A, B, & C) to provide 37 supported homes for people who have been street homeless and require a period of stabilisation and support; and one (1) ancillary office for a member of staff. There would be 9 homes in Block A and 1 office, 16 homes in Block B, and 12 homes in Block C.
- 3.1.2. The proposal would be delivered by Hill Residential Limited, a large housebuilder that builds around 2,000 homes a year, including more than 1,000 for clients and partners in the affordable housing sector. The proposal is part of a programme by the Hill Group Foundation to provide 200 modular homes for people who have been street homeless over the next five years, targeting smaller sites with easy access to a city centre where homes can be managed and monitored easily by their selected charity partners.
- 3.1.3. The proposal has been developed between the Council, a wide range of statutory and voluntary partners in the borough, and The Hill Group Foundation. The development would offer strengths-based support and trauma-informed care to enable people to move on with their lives after a period of homelessness.
- 3.1.4. The proposal seeks a temporary permission for 7 years until such time as there is greater clarity on the future of the site which is safeguarded for Crossrail 2.

### **3.2. Site and Surroundings**

- 3.2.1. The site is a parcel of land currently laid to hardstanding to the north side of Ermine Road and to the west of Tottenham High Road. The site sits within the Seven Sisters neighbourhood of Tottenham and is at the southern end of the Tottenham Area Action Plan area, set for long-term regeneration with thousands of new homes, better access to jobs and employment, and improved transport links.
- 3.2.2. To the south of the site is Ermine Road, characterised by two to three storey residential post war terraced houses. To the north east of the site on the east side of the High Road (approx. 35m) is the southern boundary of the Seven Sisters/Page Green Conservation Area. The nearest locally listed buildings are within this conservation area and include the locally listed Dutch House (on the corner of High Road / Crowland Road).
- 3.2.3. The site is bound to the north and west by green open space, designated as an Ecological Corridor (Seven Sisters east/west link) & a Site of Importance for Nature Conservation (SINC) Grade II [Tottenham Railsides] that surrounds nearby

railway lines. The site is designated as an Area of Surface Interest in the 2015 Crossrail 2 Safeguarding Direction to provide a worksite for the future delivery of the Crossrail 2 scheme.

- 3.2.4. To the east is a block with commercial on the ground floor and two storeys of residential above, beyond this is the High Road (A10) a principle A-road, providing north and south routes towards Central London and the North Circular (A406). The site sits between these commercial properties facing Tottenham High Road to the east, the Ermine Road estate (1970s council housing) to the south, and the Ermine Triangle green space to the north-west.
- 3.2.5. Ermine Road contains Cycle Superhighway 1 and although the road can be accessed by vehicles from the High Road, bollards prevent vehicles travelling beyond the western elevation of the building to the south of Ermine Road (which faces onto High Road to the east).
- 3.2.6. The site and the whole surrounding area falls within a critical drainage area (CDA). Historically the Stonebridge Brook could be found to the north/northeast of the site. This main river was historically culverted and is located at least 8m away from the northeast (rear) boundary of the site.
- 3.2.7. It is understood that the site is an area of leftover land originally intended, when the railways were built for a connecting rail loop between two crossing railways (both now parts of the London Overground passenger network); the Liverpool Street to Enfield Town line and the Gospel Oak to Barking line but this was never built and is no longer necessary

### **3.3 Relevant Planning and Enforcement history**

- There is no relevant planning or enforcement history.

## **4. CONSULTATION RESPONSE**

### **4.1. Application Consultation**

4.1.1. The following were consulted regarding the application:

- The following responses were received (Below is a summary of the received comments. Some responses have been received that are more comprehensive than what is shown below – these responses are shown in more detail in Appendix 3):

Internal:

#### **1) Design**

- *It provides an exemplary example of modular building design, in a form that is of gentle density and appearance – which is compatible with the varied but mostly residential context.*
- *There would be a secure, safe, and clearly defined boundary and definition of public, private communal, and private space, with active street frontage.*
- *Green landscaping proposed for the site will soften its appearance and be compatible with the neighbouring site of nature importance.*

## 2) Conservation

- *The proposed development would not have a negative impact on the significance of the conservation area and associated heritage assets, including the locally listed Dutch House.*

## 3) Transportation

- *The transport demands of this specialist form of housing is expected to be different from conventional housing. Flexibility could be exercised in provision for car parking and for servicing and deliveries.*
- *Conditions requiring a Construction Management/Logistics Plan (CMP/CLP); and a Delivery and Servicing Management Plan are recommended; as well as a s106 / s278 agreement for any highway works – to:*
  - *restrict occupiers from obtaining CPZ parking permits,*
  - *identify where the highway may be affected by proposals,*
  - *relocate / remove existing bollards,*
  - *allow for highway improvements / reinstatement of kerb over redundant crossovers, and*
  - *provide a public footway along the site frontage, in consultation with TfL.*

## 4) Carbon Management (Energy, offset, overheating, sustainability)

- *No objection subject to the development being constructed in strict accordance with the Carbon Reduction Statement, Technical Information Report, and Overheating Study; and subject to a carbon offset contribution of £7,454.65 being paid.*

## 5) Carbon Management (Pollution – Contamination & Air Quality)

- *No objection to the development in relation to Air Quality and Land Contamination but conditions relating to Land Contamination, Unexpected Contamination, & a Construction Environmental Management Plan (CEMP) are recommended should planning permission be granted.*

## 6) Nature Conservation / Ecology

- *The report and mitigating measures proposed are acceptable and should be conditioned into the development.*

## 7) Waste

- *This proposal will need 5 x 1100L waste receptacles for refuse and 3 x 1100L waste receptacles for dry recycling. Waste containers must be located no further than 10 metres from the point of collection.*

**8) Lead Local Flood Authority (LLFA) - Drainage / Flooding (SuDS)**

- *The LLFA are happy for the proposal to proceed at this stage subject to additional information about water network connection approval and delivery of SuDS solutions that are managed and maintained effectively for the lifetime for the development.*

**9) Noise ASB**

- *No response to date.*

**10) Building Control**

- *No response to date.*

External:

**11) Environment Agency (EA)**

- *The EA have reason to believe the site is within 3 metres of a culverted main river, the Stonebridge Brook, and have raised an objection given this close proximity. [Officer Note: a survey has been conducted which has not located the culvert. Further information will be provided in an addendum report. A condition is also recommended (no.18)].*

**12) London Fire Brigade (LFB)**

- *The Commissioner is not satisfied with the proposals for fire fighting access as the plans do not confirm if it would be possible to get to within 45 meters of fire hose length to the farthest room on the farthest block. [Officer Note: a further plan has been produced to seek to satisfy this concern. Further information will be provided in an addendum report].*

**13) Designing Out Crime Officer - Metropolitan Police Service**

- *The drawings take our concerns into consideration and provide a safer environment for the residents of the development to enjoy as well as the wider area. I cannot see any reason why the development cannot achieve accreditation according to SBD guidelines.*

**14) Transport for London (TfL)**

- *TfL have no objections to the proposal; they require further information on cycle parking and require a Construction Management/Logistics Plan (CMP/CLP) to be submitted.*

**15) Thames Water**

- *No objection regarding waste water network and sewage treatment works infrastructure capacity, based on the information provided; & No objection with regard to water network and water treatment infrastructure capacity.*

**16) GLAAS**

- *The proposal is unlikely to have a significant effect on heritage assets of archaeological interest. No further assessment or conditions are therefore necessary.*

**17) Natural England**

- *Natural England has no comment on this application with regards to designated sites.*

**18) Network Rail**

- *Network Rail have no objections to the proposals.*

**19) London Overground**

- *London Overground Infrastructure had no comments on the proposals.*

**20) Crossrail 2 (Safeguarding Direction)**

- *The site is an Area of Surface Interest in the 2015 Crossrail 2 Safeguarding Directions. In the event of a decision to progress the Crossrail 2 project the land may be subject to compulsory purchase to provide a worksite for the future delivery of the Crossrail 2 scheme.*

## **5. LOCAL REPRESENTATIONS**

5.1 The following were consulted:

- 206 Neighbouring properties
- Ermine Road Residents Association
- 3 site notices were erected close to the site

5.2 The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

- Number of individual responses:

- Objecting: 59
- Supporting: 1 (Summarised as - *Homeless people need somewhere to live*)
- Others: A petition against the proposal was received which indicates that residents from 54 local households wish to object to the proposals. It is understood that some of the signatories wish to remain anonymous, so their names and addresses were not displayed on the public register. Anonymous



objections are generally considered to have less weight than those where names and addresses are provided.

5.3 The following local groups/societies made representations:

- No representations received from local groups/societies

5.4 The following Councillor made representations:

- Councillor Barbara Blake:
  - Residents who live near this site are concerned that there could be an increase in anti-social behaviour.
  - There appears to be no specific plan in place to ensure this does not happen other than the existing structures which are overstretched.
  - There is little confidence that the site will be managed well in terms of general maintenance - landscaping, refuse collection, car parking but also managing the day to day needs of vulnerable people who live in these units.
  - Very vulnerable people will be housed here yet there seems to be very little in the way of facilities.
  - Residents are also concerned about the proximity of the units and that some of them will be overlooked.

5.5 The issues raised in representations that are material to the determination of the application are set out in Appendix 4 and summarised as follows:

- **Potential for an increase in crime** (antisocial behaviour)
- **Noise & disturbance**
- **Impact on neighbouring amenity & parking**
  - light pollution; overshadowing; overlooking; and privacy
  - waste management
- **Design**
  - The orange colouring would be obtrusive
- **Scale/no. of units and the size of the units**
  - Too many units/people
  - The units are too small

5.6 The following issues raised are not material planning considerations:

- Loss of a private view (This is a private matter and therefore not a material planning consideration)
- Impact on property values (This is a private matter and therefore not a material planning consideration)

## 6 MATERIAL PLANNING CONSIDERATIONS

**6.1** The main planning issues raised by the proposed development are:

1. Principle of the development
2. Impact on the amenity of adjoining occupiers
3. Character and appearance and setting of the nearby conservation area
4. Design & Secured by Design
5. Quality of Residential Accommodation
6. Parking and highway safety
7. Energy and Climate Change
8. Pollution – Air quality & contamination
9. Flood risk & Drainage
10. The impact on the adjacent ecological asset
11. Waste & recycling

## **6.2 Principle of the development**

### Policy Background

6.2.1 The National Planning Policy Framework NPPF was updated in July 2018 and minor clarifications to the revised version were published in February 2019. The NPPF establishes the overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process.

### The Development Plan

6.2.2 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 the Local Plan comprises the Strategic Policies Development Plan Document (DPD), Development Management Policies DPD and Tottenham Area Action Plan (AAP) and the London Plan (2016).

### The London Plan

6.2.3 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The consolidated London Plan (2016) sets several objectives for development through various policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) that provide further guidance.

6.2.4 In December 2019, the Mayor published an ‘Intend to Publish London Plan’. On 13 March 2020 & 10 December 2020, the Secretary of State issued Directions to change several proposed policies. In response to the latest direction the Mayor has formally approved a new London Plan, the ‘**Publication London Plan**’. The Publication London Plan has been sent to the Secretary of State for his consideration.

- 6.2.5 In line with paragraph 48 of the NPPF, the weight attached to this Plan should reflect the stage of its preparation; the extent to which there are unresolved objections to relevant policies; and the degree of consistency of the relevant policies in the emerging Plan to the NPPF.
- 6.2.6 Whilst the published London Plan (2016) remains part of Haringey's Development Plan, given the advanced stage that the Publication London Plan has reached, significant weight can be attached to it in the determination of planning applications (although there is greater uncertainty about those draft policies that are subject to the Secretary of State's Direction).

#### The Local Plan

- 6.2.7 The Strategic Policies DPD sets out the long-term vision of how Haringey, and the places within it, should develop by 2026 and sets out the Council's spatial strategy for achieving that vision. The Site Allocations development plan document (DPD) and Tottenham Area Action Plan (AAP) give effect to the spatial strategy by allocating sufficient sites to accommodate development needs.

#### Tottenham Area Action Plan (AAP)

- 6.2.8 The Tottenham AAP sets out a strategy for how growth will be managed to ensure the best quality of life for existing and future Tottenham residents, workers, and visitors. The plan sets area wide, neighbourhood and site-specific allocations.
- 6.2.9 The AAP indicates that development and regeneration within Tottenham will be targeted at four specific neighbourhood areas including Seven Sisters where this site is located.
- 6.2.10 Development proposals incorporating a housing element will be expected to provide the housing in accordance with the minimum capacities, set out in the Site Allocations in this AAP. Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing the other policies of this AAP and Haringey's Local Plan are not compromised. The application site meets the four listed criteria above.

#### Housing

- 6.2.11 To improve the diversity and choice of homes and to support sustainable communities in Tottenham, the Council will seek the delivery of 10,000 additional new homes across the Tottenham AAP area to meet housing needs, contribute to inclusive and mixed communities and to improve the quality of homes.

#### Assessment of the proposal

- 6.2.12 In Haringey, and across London, levels of homelessness and rough sleeping are unacceptably high. Emerging Policy H12 of the Publication London Plan notes that the delivery of supported and specialised housing for rough sleepers should be supported in principle.
- 6.2.13 The Council is committed to reducing homelessness and rough sleeping. There is not enough social housing to meet demand from homeless people, and the increasing reliance on the private rented sector to offer solutions is costly and often provides unsatisfactory and unsuitable housing.
- 6.2.14 The Haringey Local Plan (DMDPD) recognised that secured accommodation can provide suitable temporary accommodation subject to appropriate management and safeguards and can help integrate vulnerable people into the community.
- 6.2.15 Homelessness is the symptom of a complex interaction between a person's specific situation and a range of structural and social factors that are often beyond their control. To successfully tackle homelessness, the Council must increase the supply of accommodation available and meet the needs of those already in temporary accommodation.
- 6.2.16 This proposal would deliver an ongoing reduction in rough sleeping and address the multiple harms it brings to individuals and communities. The proposed modular construction would enable a rapid delivery to offer a route off the street/out of unsuitable and expensive accommodation for Haringey residents. It would improve health, wellbeing and resilience and tackle street activity associated with rough sleeping.
- 6.2.17 There is strong Policy support for purpose built affordable housing to meet specific needs. Strategic Policy SP2 (Housing) of Haringey's Local Plan aims to provide high quality new residential development in Haringey by maximising housing for people whose circumstances makes them vulnerable and/or people with specific needs.
- 6.2.18 The site is a brownfield site within a residential area so there is policy support for residential development on the site.
- 6.2.19 Policy H12 Supported and specialised accommodation of the Publication London Plan states that the delivery of supported and specialised housing which meets an identified need should be supported. It goes on to state that the form this takes will vary, and it should be designed to satisfy the requirements of the specific use or group it is intended for. It then goes on to list what Supported and specialised accommodation could include. The list includes:
- accommodation for people leaving hostels, refuges, and other supported housing to enable them to live independently
  - accommodation for rough sleepers.

6.2.20 Paragraph 4.12.2 of the Publication London Plan notes that Supported and specialised accommodation can include accommodation that incorporates support for a particular group, sometimes until they are ready to move on. The proposed development would seek to do this.

6.2.21 Policy DM15: Specialist Housing of the Development Management DPD (DMDPD) supports proposals for new special needs housing. It sets out the criteria for considering special needs housing, which must show that:

- a) *There is an established local need for the form of special needs housing sought having regard also to the aims and recommendations of Haringey's Housing Strategy and Older People Strategy;*
- b) *The standard of housing and facilities are suitable for the intended occupiers in terms of:*
  - i. *The provision of appropriate amenity space, parking, and servicing;*
  - ii. *The level of independence; and*
  - iii. *Level of supervision, management, and care/support;*
- c) *There is a good level of accessibility to public transport, shops, services, and community facilities appropriate to the needs of the intended occupiers; and*
- d) *The impact of the proposed development would not be detrimental to the amenity of the local area or to local services.*

6.2.22 Each of these requirements is considered below.

a) Established Local Need

6.2.23 Haringey's Homelessness strategy (2018) notes that homelessness is a problem that affects Haringey particularly severely; with the second highest level of homelessness in the country it advocates a radical new approach to reduce the multiple harms that homelessness causes. The strategy is a material consideration.

6.2.24 It notes that rough sleeping is the most visible form of homelessness and the most damaging. It causes significant harm to individual physical and mental health, and general wellbeing and reduced life expectancy. A female sleeping on the streets has a life expectancy of 43 years and a male 47 years, the UK national average is approximately 83 years for females and 79 years for males.

6.2.25 There is a significant need within Haringey for supported housing for people who have been street homeless and require a period of stabilisation and support to regain their confidence, health, and independence. Haringey's Housing Strategy

2017-2022 (HS) notes (pg18) that it will seek to provide suitable and affordable temporary accommodation, while overall reducing its cost.

6.2.26 Like many other boroughs, Haringey Council finds it increasingly difficult to secure good quality, sustainable, and affordable temporary accommodation. Competition for private rented homes has driven up prices while the council is dealing with rising levels of homelessness meaning households spend longer in temporary accommodation.

6.2.27 The proposed development has been designed using relationships and expertise developed between the Council and a wide range of statutory and voluntary partners within Haringey. The service proposes to offer strengths-based support and trauma-informed care to enable people to move on with their lives after a period of homelessness.

6.2.28 This is in line with the approach advocated in the HS under section 6.2 (Taking new approaches to temporary accommodation) which states that in order for the Council to secure good quality, sustainable and affordable temporary accommodation they will:

- Forge new partnerships with investors offering long term investment to provide affordable, good quality, secure homes to help homeless households as well as additional, cheaper temporary accommodation.
- Maximise the supply of affordable high quality temporary accommodation inside the borough.
- Use innovative solutions, for example Modern Methods of Construction, for rapid provision of homes on sites suited to this use.

6.2.29 The proposal meets the preference of the HS (pg20) to provide temporary accommodation within Haringey. It is very difficult to secure the volume of homes needed at a cost that is affordable for the resident and will not require additional subsidy by the council. The method of construction also allows this to be delivered at the earliest opportunity.

6.2.30 The proposal would enable the Council to address the damage rough sleeping has had on the physical and mental health, and general wellbeing of Haringey residents that have been street homeless. It would help to provide coordinated shelter and support to increase life expectancies and break the cycle of suffering that the people affected can experience.

b) Standard of Housing

6.2.31 The proposal has been devised by those that deliver this type of supported housing for people who have been street homeless, as well as by former and prospective service users themselves.

6.2.32 It has been designed to meet the specific needs of residents through homes that provide an appropriate level of independence, supervision, management, and care/support to enable a period of stabilisation in combination with strengths-based support and trauma-informed care to enable the residents to move on with their lives after a period of homelessness.

6.2.33 The proposal provides housing and support in one location, within Haringey, which engenders a solution that is likely to have better outcomes for the occupants at a lower cost than alternative temporary housing solutions that are available which is in line with the Council's Housing Strategy (2018) .

6.2.34 The proposed homes would be 24sqm which is smaller than the 37sqm recommended for a 1-bed flat with a shower room in the Technical housing standards produced by the Department for Communities and Local Government. They have been designed as specialist housing for temporary accommodation to support people who have been street homeless at a low cost.

6.2.35 The homes have been designed to be large enough to enable a good quality home for people that have experienced homelessness, while ensuring residents can manage the home and are not vulnerable to exploitation through 'cuckooing' (a practice where people take over a person's home and use the property to facilitate exploitation).

6.2.36 As such, the shortfall is considered acceptable in this instance, for it to provide specialist housing in a short time and at a low cost - to address a significant housing need. The residential quality is assessed in more detail in the residential amenity section below. This does not set a precedent for smaller self-contained flats in the borough as weight has been given to the very-specific circumstances of this case.

c) Accessibility to public transport, shops, services, and community facilities

6.2.37 The site has a high level of accessibility to public transport with a PTAL 6a one of the highest possible due to proximity to South Tottenham Station, Seven Sisters Underground Station, and numerous bus routes on the High Road. It is also close to Cycle Superhighway 1 which runs along Ermine Road. The site is in a location well served by shops, services, and community facilities – being on Tottenham High Road.

d) Impact on amenity of the local area or to services

6.2.38 The proposal would not be detrimental to the amenity of the area as set out in detail in the following sections of the report. It is on a vacant site within a residential area which has issues with fly tipping, illegal occupation, and antisocial behaviour. The proposal is relatively modest in scale so would not impact on neighbouring residents.

6.2.39 The proposal would not have a detrimental impact on local services – the residents would have access to on-site strengths-based support and trauma-informed care during the day and a concierge at night; residents would largely be supported within the site.

### Crossrail 2 Safeguarding

6.2.40 The London Plan (2016) Policy 6.4 states that the Mayor will work with strategic partners to improve the public transport system in London and increase public transport capacity by developing Crossrail 2. This commitment is carried into the Publication London Plan Policy T3 which states that in development decisions, particular priority should be given to securing and supporting the delivery of Crossrail 2. The site is designated as an Area of Surface Interest in the 2015 Crossrail 2 Safeguarding Direction to provide a worksite for construction. The proposal is for a period year permission for the buildings. Due to their modular construction they are demountable and can be moved to another site in future if the site is required for the delivery of Crossrail 2.

6.2.41 TFL raise no objections. The proposal would therefore not hinder the delivery of Crossrail 2 and makes use of the site for housing in the interim before Crossrail is delivered.

## 6.3 Impact on the amenity of adjoining occupiers

6.3.1 The London Plan (2016) Policy 7.6 Architecture states that development must not cause unacceptable harm to the amenity of surrounding land and buildings. Publication London Plan Policy D3 Optimising site capacity through the design-led approach states that the experience of development proposals should deliver appropriate outlook, privacy, and amenity; and achieve safe, secure and inclusive environments.

6.3.2 DMDPD Policy (2017) DM1 'Delivering High Quality Design' states that development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours.

### Fear of crime

6.3.3 Several concerns have been raised by local residents in relation to a potential increase in crime from the new residents. All occupants would be referred to the service using a robust referral process, led by the Haringey Street Outreach Team and the Council's Homelessness Pathway Team.

6.3.4 There would be no direct access to the service without a prior referral and assessment of suitability. This ensures that vulnerabilities and support needs are



explored with each person before they move in. This approach ensures the safety of the occupants as well as that of others.

6.3.5 The site design is intended to reduce opportunities for anti-social behaviour by creating a well-lit and visible environment with appropriate but not invasive CCTV. There would always be a member of staff on site. This would be a support worker in the daytime and a concierge at night. The staff office is positioned with good visibility across the site which would enable the management of visitors to the site at all times.

6.3.6 The scheme has also been reviewed by a Designing out Crime Officer at the Metropolitan Police who considers the development can achieve accreditation according to Secured by Design (SBD) guidelines. A number of the SBD Officer's recommendations have been discussed with the applicant. These include specific boundary / fencing requirements; removal of non-transparent panels on external stair landings (for natural surveillance); enclosure of space under stairwells (to prevent loitering); CCTV; lighting; and a postal strategy (to discourage unsolicited visits and postal theft).

#### Noise & disturbance

6.3.7 Objections have also been made relating to concerns that there would be an increase in noise and disturbance from the new occupants. As with the concerns relating to a potential increase in crime, there would always be a member of staff present who could deal with any issues in this regard.

#### Light spill

6.3.8 Concerns have been raised about light spillage and light pollution from the development. The site is opposite a residential area that is near to Tottenham High Road. There are several street lamps in the vicinity of the site and although there would be lighting in the scheme, this would be commensurate with what is in the locality and, as such, would not result in a material change that would result in harm to the amenity of nearby residents.

#### Impact on views from neighbouring buildings

6.3.9 Given the low height of the buildings and their siting and orientation away from neighbouring properties, there would be no overshadowing of adjacent properties. The closest block to properties on Ermine Road (Block A) would be largely face the highway and would appear as an obtrusive feature when viewed from nearby neighbouring properties.

6.3.10 The low height and siting of the buildings within the site would mean that they would not have an overbearing presence on nearby neighbouring properties and would not result in an undue sense of enclosure.

#### Privacy

6.3.11 The orientation of the buildings would limit overlooking from the site. Block C is orientated so that it faces west, and Block B is located at the back of the site behind Block A. Block A would be the closest block to the existing properties to the south of Ermine Road. However, the distance between these properties would be commensurate with the character of the locality.

6.3.12 Block A would comprise a total of 10 units with 5 at ground floor and 5 above. 1 of the units would be the site office. Block A would be set back from the site boundary and would be orientated towards the southeast – facing the T-junction in this part of Ermine Road.

6.3.13 Block A would not directly face the properties to the south of Ermine Road and given the distances between them (approx. 12m), the level of overlooking would be commensurate with the character of the locality. The proposed units also have relatively modest windows and given the siting and orientation; the privacy of existing residents would not be adversely affected to a material degree by the proposal.

#### **6.4 Character and appearance and setting of the nearby conservation area**

6.4.1 London Plan Policy 7.8 and Policy HC1 of the Publication London Plan requires development affecting heritage assets and their settings to conserve their significance by being sympathetic to their form, scale, and architectural detail.

6.4.2 Policy SP12 ‘Conservation’ states that the Council shall ensure the conservation of the historic significance of Haringey’s heritage assets, their setting, and the wider historic environment. The policy states that the Historic Environment should be used as the basis for heritage-led regeneration and as the basis for good design and positive change and, where possible, development should help increase accessibility to the historic environment.

6.4.3 DMDPD Policy DM9 ‘Management of the Historic Environment’ states that development which conserves or enhances the significance of a heritage asset and its setting will be supported. Proposals affecting a designated or non-designated heritage asset and its setting will be assessed against the significance of the asset and its setting, and the impact of the proposals on that significance.

6.4.4 The proposed development falls within the setting of the Seven Sisters/Page Green Conservation Area. A rendered image has been submitted which shows the proposed development from the corner of Crowland Road and the High Road, opposite (south) of the locally listed Dutch House and just outside the Conservation Area.

6.4.5 The proposed development would only be partially visible from the southernmost part of the Conservation Area, as it would be mostly screened by the terrace on

the western side of the High Road. Due to its modest mass and scale, it would be consistent with the surrounding townscape and would not detract from it.

- 6.4.6 Therefore, the proposed development would not result in material harm to the significance of the Conservation Area and associated heritage assets, including the locally listed Dutch House.
- 6.4.7 The Conservation Officer has noted that it would be desirable for the materials and colour palette of the development to reflect materials used in the local area, rather than contrast with them. However, this method of construction would not allow brick or a brick cladding panel to be used. Furthermore, the scale of the building would be modest and its siting (with the larger two blocks set back in the site) would mean that the building would have an acceptable appearance.

## **6.5 Design**

- 6.5.1 DMDPD Policy (2015) DM1 'Delivering High Quality Design' states that development proposals should relate positively to their locality, having regard to, building heights, form, scale & massing prevailing around the site, urban grain, sense of enclosure and, where appropriate, following existing building lines, rhythm of any neighbouring or local regular plot and building widths, active, lively frontages to the public realm, and distinctive local architectural styles, detailing and materials.
- 6.5.2 Local Plan (2017) Policy SP11 states that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe, and easy to use. Development shall be of the highest standard of design that respects its local context and character and historic significance, to contribute to the creation and enhancement of Haringey's sense of place and identity which is supported by London Plan (2016) Policies 7.4 and 7.6 and Publication Policy D3.
- 6.5.3 The Council's design officer has been consulted and notes that the development provides an exemplary example of modular building design, in a form that is of gentle density and appearance – which is compatible with the varied but mostly residential context. The 2 storey scale of development would be within and below the prevailing height and bulk of the surroundings.
- 6.5.4 The rhythm of windows and doors, panels, and colours, would provide an attractive elevational / fenestration pattern of a comparable scale and proportion to the ordinary domestic surroundings, whilst being clearly of contemporary appearance expressing its progressive modern construction.
- 6.5.5 In terms of the layout, they note that the development would make a significant contribution to improving animation and liveliness to the street. There would be a secure, safe, and clearly defined boundary and definition of public, private

communal, and private space, with active street frontage. Green landscaping proposed for the site will soften its appearance and be compatible with the neighbouring site of nature importance.

- 6.5.6 The rest of the site layout and enclosures would provide clear, secure boundaries, avoiding creating unobserved ambiguous corners and providing a clear pedestrian route from street to site entrance and site entrance to flat entrance, with stairs to access balconies to 1st floor flats all opening off and clearly visible from the central space.
- 6.5.7 In terms of residential quality, they note that the central space will provide a convivial communal meeting and amenity space, benefiting from grassed and paved areas to provide a variety of external amenity in addition to the private external amenity outside each flat's front door.
- 6.5.8 Overall, the proposal is considered a high quality design that is appropriate for the site.

### **Secured by Design**

- 6.5.9 Publication London Plan Policy D11 Safety, security and resilience to emergency states that Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers 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.
- 6.5.10 Local Plan Policy Sp11 'Design' states that all new development should incorporate solutions to reduce crime and the fear of crime, such as promoting social inclusion; creating well-connected and high quality public realm that is easy and safe to use; and by applying the principles set out in 'Secured by Design'.
- 6.5.11 The Designing Out Crime Office of the Metropolitan Police has been consulted on the application and involved in the design process. They have no objections to the proposals on the site subject to conditions and an informative offering recommendations to minimise crime and the fear of crime within the development and the local community.
- 6.5.12 A Condition is recommended that a 'Secured by Design' accreditation shall be obtained for the development prior to occupation and the features that are agreed to be necessary for security are retained for the lifetime of the development. This would ensure that the development is safe and secure and would reduce crime and the fear of crime.

## **6.6 Quality of Residential Accommodation**

- 6.6.1 London Plan (2016) policy 3.5 and Publication Policy D6 requires the design of all new housing developments to enhance the quality of local places and for the dwellings to be of sufficient size and quality. Local Plan (2017) Strategic Policy SP2 and Policy DM12 of the Development Management DPD 2017 reinforce this approach. The Mayor's Housing SPG sets out the space standards for new residential developments to ensure an acceptable level of living accommodation is offered.
- 6.6.2 The proposed homes would be smaller than the nationally described space standard for a 1-bed, 1-person self-contained home which has a shower room (37sqm). 37sqm is also the requirement within the London Plan (2016) and the Publication London Plan (2020). The proposed homes would be 24sqm.
- 6.6.3 The proposed housing has been specifically designed to enable people who have been street homeless to stabilise their situation for a temporary period whilst also being able to get access to support to regain their confidence, health, and independence. It is intended that the homes do not provide any additional or excess space over what is required to meet their needs.
- 6.6.4 This type of housing and the support services being offered are not being delivered within more traditional forms of housing given the high development costs. Essentially, the modular build type maximises the number of homes it can provide whilst still offering a good level of accommodation that would otherwise be delivered in a more spread out, unsuitable, and costly fashion through temporary accommodation rented from the private sector.
- 6.6.5 The modular building design would also enable the rapid provision of homes to enable support and accommodation to be provided for people who have experienced rough sleeping at the earliest opportunity. This could not be viably delivered in any other format given the capital expenditure involved.
- 6.6.6 As such, allowances should be made on the space standards as the public benefits in this regard outweigh any perceived harm.

## **6.7 Parking and highway safety**

- 6.7.1 Local Plan (2017) Policy SP7 Transport states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This is supported by DM Policy (2017) DM31 'Sustainable Transport'.
- 6.7.2 DM Policy (2017) DM32 'Parking' states that the Council will support proposals for new development 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 (PTAL), a Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development, parking is provided for disabled people; and parking is designated for occupiers of developments specified as 'car capped' which means that no parking other than the space on site is available to residents or staff.

- 6.7.3 The site is close to alternative and accessible means of transport, it has a high PTAL, and a Controlled Parking Zone (CPZ) exists near to the site. One parking space would be provided for disabled people in line with Publication London Plan standards. It is therefore acceptable for the scheme to be car capped.
- 6.7.4 Ordinarily a legal agreement would also be entered into which would restrict occupiers from obtaining CPZ parking permits. However, the temporary and specialist nature of the housing must be considered when assessing whether this is required by the development. These are homes would be steppingstones to help people transition from rough sleeping. The proposal would give residents time to adjust to living in their own place and to develop their independent living skills. Following this they will move on to their own permanent homes.
- 6.7.5 As such, it is highly unlikely given the above and the length of tenancy that residents would own a car. In any event, a condition is recommended which would ensure that the development would not be occupied other than through a lease/license that ensures that residents are obligated not to apply for a parking permit for any CPZ.

#### Deliveries & Servicing

- 6.7.6 This is a specialist form of supported housing that has been specifically designed to enable people who have been street homeless to stabilise their situation for a temporary period. It is intended that the homes do not provide any additional or excess space over what is required to meet their needs. Given the specialist nature of the housing, it is unlikely that the development would incur a similar level of delivery/servicing trips as a typical residential development with 37 homes.
- 6.7.7 In any event, the development has provided a parking space on site only for deliveries and emergency vehicles and a condition is recommended to ensure it is only used as such. Given the nature of the proposed use this level of provision would be appropriate to deal with the likely volume of deliveries and servicing. As such, a management plan to address these issues would be unnecessary.

#### Cycle Parking

- 6.7.8 The proposal would provide 38 cycle parking spaces that would all be secure, sheltered, & accessible. The total of 38 includes 36 Spaces for long stay which includes 4 spaces for larger cycles and 2 short stay spaces. This would result in a deficit of 1 space from the minimum required under Policy T5 of the Publication London Plan.

6.7.9 Another space could be accommodated within the site to meet the standard, but it would disrupt the layout and pedestrian movements within the site, and it would not be sheltered. Therefore, it would be less secure and, as a result, much less likely to be used. It is also highly unlikely that all residents would always require a cycle parking space. Given these circumstances, the provision of an additional space to meet the standard would be unnecessary.

#### Construction Management/Logistics

6.7.10 Whilst the period of construction for modular developments is generally rapid compared to typical forms of development, there will still be disruption from the traffic movements associated with the delivery and craning onto the site of the buildings. A condition has been recommended (as advised by the Council's Transportation Officers and TfL) which would require a Construction Management/Logistics Plan (CMP/CLP) to be submitted for approval prior to these works being carried out to ensure that disruption is minimised.

6.7.11 The proposed development does not propose any highway works. The existing crossovers and footways are maintained. In the absence of any works being made to the highway, a s278 agreement would not be required.

6.7.12 A request has also been made for the development to deliver highway improvements and provide a public footway along the site frontage, so that the northern side of Ermine Road has a continuous footway connecting to the High Road. Given the temporary nature of the development the improvements could be superseded after the 7 year period, so it is unreasonable and unnecessary for the development to provide this.

## **6.8 Energy and Climate Change**

6.8.1 The NPPF and London Plan Policies 5.1, 5.2, 5.3, 5.7, 5.8, 5.9, 5.10 and 5.11, and Local Plan Policy SP4 sets out the approach to climate change and requires developments to meet the highest standards of sustainable design, including the conservation of energy and water; ensuring designs make the most of natural systems and the conserving and enhancing the natural environment.

6.8.2 The London Plan requires all new homes to achieve a zero carbon target beyond Part L 2013 of the Building Regulations. The Publication London Plan further confirms this in Policy SI2. The London Plan also sets a target of 25% of the heat and power used in London to be generated using localised decentralised energy systems by 2025. Where an identified future decentralised energy network exists near a site it will be expected that the site is designed so that it can easily be connected to the future network when it is delivered.

- 6.8.3 The applicant is not proposing any Be Clean measures. The site is not within reasonable distance of a proposed Decentralised Energy Network (DEN) and a Combined Heat and Power (CHP) plant would not be appropriate for this site.

Carbon Offset Contribution

- 6.8.4 New development is expected to achieve the necessary energy and CO<sub>2</sub> requirements within the London Plan and Haringey Council's Local Plan or pay an offset payment at £95/tCO<sub>2</sub> over 7 years. The applicant has submitted a Carbon Reduction Statement which states that the Carbon shortfall to offset is 11.21 tCO<sub>2</sub> which requires a carbon offset contribution of £7,454.65. This will be required by Condition.

Adherence to submitted Energy Strategy

- 6.8.5 Conditions are attached to ensure that the development shall be constructed in strict accordance with the Carbon Reduction Statement, Technical Information Report, and Overheating Study. This shall ensure that the agreed carbon reduction of 59% beyond a Building Regulations 2013 compliant building (with SAP10 carbon factors) will be achieved. The condition would also ensure that the energy efficient materials and air source heat pumps are maintained for the lifetime of the development.

**6.9 Pollution – Air quality & contamination**

- 6.9.1 Policy 5.21 (Contaminated land) of the London Plan (2016) highlights the Mayor's support for the remediation of contaminated sites and commits him to work with strategic partners to ensure that development of brownfield land does not result in significant harm to human health or the environment and to bring contaminated land to beneficial use.
- 6.9.2 DMDPD Policy DM23: Environmental Protection notes that proposals for new development will only be permitted where it is demonstrated that any risks associated with land contamination, including to human health and the environment, can be adequately addressed in order to make the development safe.
- 6.9.3 It goes on to state that all proposals for new development on land which is known to be contaminated, or potentially contaminated, will be required to submit a preliminary assessment to identify the level and risk of contamination and, where appropriate, a risk management and remediation strategy.

Land Contamination

- 6.9.4 The applicant has submitted information in this regard which has been assessed by the Council's Lead Officer – Pollution. They have no objection to the development in relation to Land Contamination but recommend a condition which would require a site investigation to be designed for the site which would enable



a risk assessment to be undertaken and a Method Statement to be developed which details remediation requirements. The condition would then require these to be carried out should they be required.

- 6.9.5 A further condition is recommended which would require development works to stop should any contamination not previously identified be found to be present at the site. A remediation strategy detailing how this contamination would be dealt with would then need to be submitted and approved in writing by the Local Planning Authority and implemented as approved.

#### Air Quality

- 6.9.6 Policy SI 1 Improving air quality sets out several criteria to tackle poor air quality, protect health and meet legal obligations. Policy DM23: Environmental Protection of the DMDPD requires all development proposals to consider air quality and be designed to improve or mitigate the impact on air quality in the Borough; and improve or mitigate the impact on air quality for the occupiers of the building or users of the development.
- 6.9.7 The Council's Lead Officer – Pollution has no objection to the development in relation to air quality. However, to safeguard residential amenity, reduce congestion, and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality a condition is recommended which would require a Construction Environmental Management Plan (CEMP) to be submitted and approved in writing by the local planning authority.

### **6.10 Flood Risk and Drainage**

- 6.10.1 Publication London Plan Policies SI 12, SI 13 and Local Plan (2013) Policy SP5 (Water Management and Flooding) require developments to utilise Sustainable Urban Drainage Systems (SUDS) unless there are practical reasons for not doing so, and aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy.
- 6.10.2 Policy also requires drainage to be designed and implemented in ways that deliver other policy objectives, including water use efficiency and quality, biodiversity, amenity, and recreation. Further guidance on implementing Policy 5.13 is provided in the Mayor's Sustainable Design and Construction SPG (2014) including the design of a suitable SUDS scheme.
- 6.10.3 The site is located within Flood Zone 1 (low risk) but is within a Critical Drainage Area. The applicant has submitted a Drainage and Flood Risk Design Note and a Below Ground Drainage Layout drawing that includes an attenuation system and permeable paving throughout the site.

- 6.10.4 The Council's SuDS Officer has been consulted and has advised that the LLFA, accept the proposed SuDS solutions. They are satisfied with the proposal in terms of drainage subject to a condition to ensure a revised FRA is submitted that meets all of the requirements of the Haringey guidance as well as evidence that Thames Water have given consent to connect to their network and capacity exists to receive the surface water.
- 6.10.5 A comprehensive management maintenance schedule has been provided that will see the system function effectively for the duration of the site. Conditions are attached to ensure these drainage solutions are delivered and maintained accordingly
- 6.10.6 The Environment Agency have reason to believe the site is within 3 metres of a culverted main river, the Stonebridge Brook, and have raised an objection given this close proximity.
- 6.10.7 The applicant has employed consultants to survey the area who have only located a Thames Water surface water sewer network which is 23.9m away at its closest point. The survey information indicates that no other subterranean waterways have been located closer to the boundary. The applicant has contacted Thames Water to see if they can confirm that the sewer is the adopted watercourse – A response to this has not yet been received.
- 6.10.8 At the time of drafting the report the EA have not retracted their objection. However, the applicant has surveyed the area and cannot locate any waterways. Given the nature of the development – which requires little in the way of excavation and foundations; and given the lack of evidence to counter the applicant's position – there is no evidence to show that the units would be placed within 8m of a culvert. Further information will be provided in an addendum report.

## **6.11 The impact on the adjacent ecological asset**

- 6.11.1 Policy G5 of the Publication London Plan states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of building design. Policy G6 of the same document states that SINC's should be protected.
- 6.11.2 Policy SP13 of the Local Plan states that all development shall protect and enhance sites of biodiversity and nature conservation. Policy DM19 Part A of the DM DPD states that development proposals which are on or adjacent to a SINC or an ecological corridor should protect and enhance the nature conservation value of the site.
- 6.11.3 Part B of the same policy states that development that has a direct or indirect adverse impact upon important ecological assets will only be permitted where: (a)

the harm cannot be reasonably avoided, and; (b) it has been suitably demonstrated that appropriate mitigation can address the harm caused.

6.11.4 Policy DM21 of the DM DPD states that proposals should maximise opportunities to enhance biodiversity on site, including through appropriate landscaping, living roofs and green walls. Policy DM1 states that development proposals will be expected to respond to trees on or close to the site.

6.11.5 The Council's Nature Conservation Officer has been consulted and is satisfied with the proposal noting that an ecological review of the site has been carried out which has highlighted that there is negligible ecological interest on the site and no remaining scope for protected species to use the site in any significant way.

6.11.6 Adjacent to the site bats are known to be present foraging within the Tottenham Railsides SINC. As such, ensuring the risk of light spill onto the SINC is minimised by careful placement of any external lighting and directional shading would help to protect this European protected species. A condition is attached to ensure harmful light spill into/onto the SINC would not occur.

6.11.7 The Nature consideration officer also notes that the SINC is also directly adjacent and young and semi-mature trees are close to the site. Care must therefore be taken not to damage the root zones or the canopies of these trees (including through soil compaction and disturbance).

6.11.8 They recommend conditions that would ensure that tree root zones and canopies are protected. They note that a robust fence has been incorporated into the scheme which would ensure access to the SINC is restricted. This would help to preserve and safeguard the ecological asset.

6.11.9 The proposal would therefore protect the ecology of the area subject to the imposition of the conditions mentioned above.

## **6.12 Waste and Recycling**

6.12.1 London Plan Policy 5.16 indicates the Mayor is committed to reducing waste and facilitating a step change in the way in which waste is managed. Local Plan Policy SP6 Waste and Recycling and DPD Policy DM4 require development proposals to make adequate provision for waste and recycling storage and collection.

6.12.2 The proposal provides sufficient waste storage through the provision of a refuse store which holds 5 x 1100L waste receptacles for refuse & 3 x 1100L waste receptacles for dry recycling. The plans indicate that the waste containers would be located no further than 10 metres from the point of collection (which would be on Ermine Road).

6.12.3 The plans also show the route from the waste storage point to the collection point to be as straight as possible with no kerbs or steps. The gradient would also be close to 1:20 and surfaces would be smooth and sound, & concrete rather than flexible. A dropped kerb is already installed, in the location where they would be placed onto the street for collection.

6.12.4 Generally, major schemes with this many units would provide for waste collection vehicles to enter and exit the development using forward motion gears. The proposed development would have a modest floorspace and would be on a small site at the end of what is effectively a cul-de-sac. The specialist nature of the housing and the characteristics of the locality do not require this. Provision would be made for waste receptacles to be collected by a refuse vehicle in Ermine Road.

6.12.5 A condition is attached which would require the codes, keys, transponders or any other type of access equipment to be provided to the Council and for the access to the waste storage to remain unobstructed and within 10m from Ermine Road on collection day. This would ensure suitable provision is provided.

## **6.13 Conclusion**

6.13.1 The proposals would provide much needed housing for a section of the community where the need is amongst the greatest. The site is suitable for residential development, but this would be unlikely to come forward in another form due to it being safeguarded for Crossrail 2. The proposal would provide an exemplary modular building, in a form that is of gentle density and appearance that would be compatible with the varied but mostly residential context.

6.13.2 These homes would be steppingstones to help people transition from rough sleeping. The proposals would give prospective residents time to adjust to living in their own place and to develop their independent living skills. Following this they will move on to their own permanent homes. The units are thoughtfully designed through consultation with individuals who have slept rough or have had experiences of homelessness.

6.13.3 The GLA, through the Rough Sleeping Accommodation Programme (RSAP), has awarded Haringey Council funding for the scheme, based on the current size of the proposed units. The sizes not only aid delivery but prevent cuckooing and the renting out of bedrooms for other antisocial purposes.

6.13.4 The proposal and the recommended conditions ensure the proposal delivers much needed temporary housing in a way that complies with the development plan. The concerns of residents are noted but the submission outlines how these issues would be minimised and addressed to ensure the safety of new and existing residents.

6.13.5 All other relevant policies and considerations have been taken into account.

#### Equalities

6.13.6 In determining this planning application, the Council is required to have regard to its obligations under equalities legislation including obligations under the Equality Act 2010. In carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful discrimination, and secondly to the need to promote equality of opportunity and to foster good relations between persons who share a protected characteristic and persons who do not share it.

6.13.7 As discussed above, the development provides accommodation and access to support for people who are street-homeless. This will also likely provide other opportunities that street-homeless people may not currently have equal access to. It is also noted that street-homelessness is more likely to affect groups with a protected characteristic such as individuals with disabilities, those experiencing mental health issues, LGBTQ+ persons, and young men. The proposal would support equality of opportunity and may also benefit specific priority groups.

6.13.8 Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION

#### **6.14 CIL**

6.14.1 Based on the information given on the plans, the Mayoral CIL charge will be £54,720 (912sqm x £60.55) and the Haringey CIL charge will be £19,061 (912sqm x £20.90). This would be charged in accordance with the CIL Charging Schedule and any eligible relief and includes indexation in line with the RICS CIL Index.

### **7 RECOMMENDATIONS**

GRANT PERMISSION subject to conditions in Appendix 1

Applicant's drawing No.(s)

Location Plan 109-08-PS-001; Proposed Site Plan 109-08-PS-002 K; Proposed Ground Floor Plan 109-08-PS-010 K; Proposed First Floor Plan 109-08-PS-011; Block A Elevations / Street Section 109-08-PS-020 Rev: C; Block B Elevations / Site Section A 109-08-PS-021 Rev: C; Block C Elevations / Site Section B 109-08-PS-022 Rev: C; GA Elevations (Colour) 0000-HF-000-00-DR-BC-0002 REV C03; ROOF PLAN CHM-D-18 D04; GENERAL PLAN CHM-D-01 D05

## **Appendix 1**

Subject to the following condition(s)

### **Temporary Permission**

- 1) This permission shall be for a limited period expiring on 15/01/2028 when the building hereby approved shall be removed and the land reinstated.

Reason: The permanent retention of the building may prejudice the future development of the site thus preventing the optimal use of the site inconsistent with Policy 3.4 of the London Plan 2016.

### **Approved Plans**

- 2) The approved plans comprise drawing numbers (Location Plan 109-08-PS-001; Proposed Site Plan 109-08-PS-002 K; Proposed Ground Floor Plan 109-08-PS-010 K; Proposed First Floor Plan 109-08-PS-011; Block A Elevations / Street Section 109-08-PS-020 Rev: C; Block B Elevations / Site Section A 109-08-PS-021 Rev: C; Block C Elevations / Site Section B 109-08-PS-022 Rev: C; GA Elevations (Colour) 0000-HF-000-00-DR-BC-0002 REV C03; ROOF PLAN CHM-D-18 D04; GENERAL PLAN CHM-D-01 D05). The development shall be completed in accordance with the approved plans and retained as such thereafter for the lifetime of the development except where conditions attached to this planning permission indicate otherwise or where alternative details have been subsequently approved following an application for a non-material amendment.

Reason: In order to ensure the development is carried out in accordance with the approved details and in the interests of amenity and good planning.

### **Materials as indicated on approved plans**

- 3) The external materials to be used for the proposed development shall match the colour, size, shape, and texture of the materials indicated on the approved plans except where conditions attached to this planning permission indicate otherwise.

Reason: In order to ensure a satisfactory appearance for the proposed development, to safeguard the visual amenity of neighbouring properties and the appearance of the locality consistent with Policy 7.6 of the London Plan 2016, Policy SP11 of the Haringey Local Plan 2013 and Policy DM1 of The Development Management DPD 2017.

### **No Parking Permits for New Residents**

- 4) The development shall not be occupied other than through a lease/license/agreement between the operator and each resident that ensures that occupants of the development hereby approved are obligated not to apply for a parking permit for any Controlled Parking Zone (CPZ).

Reason: In order to ensure car parking is restricted in line with levels of existing and future public transport accessibility and connectivity and to comply with Policy T6 of the Publication London Plan (2020) & Policy DM32 of The Development Management DPD 2017.

#### **All Parking Delivered as Approved**

- 5) The vehicular and cycle parking spaces shown on the approved plans shall be laid out and installed as approved and retained for the lifetime of the development. The hatched parking space indicated on drawing '109-08-PS-010 K' shall only be used for deliveries & servicing; or in/for emergencies except where conditions attached to this planning permission indicate otherwise or where alternative details have been subsequently approved following an application for a non-material amendment.

Reason: In order to ensure sufficient space is given over within the development to facilitate safe, clean, and efficient deliveries and servicing and to comply with Policies T5, T6, T6.1, & T7 of the Publication London Plan (2020).

#### **Construction Management/Logistics Plan**

- 6) Prior to above ground works, a Construction Management/Logistics Plan shall be submitted to and approved in writing by the local planning authority. The CLP shall be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:
- i. Details of key phases of the construction programme, corresponding site layout, number of staff including modes of travel, parking provision (vehicles and cycles);
  - ii. Arrangements for management of construction material deliveries / removal, material storage, skip storage;
  - iii. Daily number and size of construction vehicles expected, vehicular swept paths (with 300mm error margins) to demonstrate largest construction vehicles arriving, parking in loading/unloading area, manoeuvring and departing in forward gear;
  - iv. Details of all temporary traffic management and parking restrictions required;
  - v. Details of any highway licences required due to the crane oversailing the public highway;
  - vi. Wheel washing facilities to keep highway clean of mud etc;
  - vii. Arrangements for management of Health and safety;
  - viii. Arrangements for dealing with complaints;
  - ix. Hours of operations;
  - x. Monitoring and joint working arrangements, where appropriate;
  - xi. Site access and car parking arrangements;
  - xii. Delivery booking systems (allocated delivery slots for site management);

- xiii. A swept path analysis for crane vehicles carrying the necessary equipment;
- xiv. Agreed routes to/from the site;
- xv. Confirmation that all vehicles are recognised in the Fleet Operators Recognition Scheme (FORS) or similar;
- xvi. Timing of deliveries to and removals from the site by construction vehicles (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and
- xvii. Travel plans for staff/personnel involved in construction works to detail the measures to encourage sustainable travel to the site during the construction phase; and
- xviii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking, and consolidation of facilities such as concrete batching; and
- xix. Temporary obstructions during the construction and delivery must be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians or obstruct the flow of traffic on the TLRN.

Reason: In order to ensure that the proposal is consistent with Publication London Plan Policy T7 and to safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality and to comply with DMDPD Policy DM23: Environmental Protection.

### **Energy Strategy**

- 7) The development shall be constructed in accordance with:
- the Carbon Reduction Statement – ModulHaus Ermine Road prepared by Volumetric Modular Ltd (dated December 2020);
  - Overheating, MVHR, ASHP Technical Information Report prepared by Hill (dated 5 October 2020); and
  - the TM59 Overheating Study prepared by The Richards Design Partnership (dated November 2020).

and

the energy efficient materials and air source heat pumps shall be maintained for the lifetime of the development except where conditions attached to this planning permission indicate otherwise or where alternative details have been subsequently approved following an application for a non-material amendment.

Reason: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2016 Policy 5.2, Publication London Plan Policy SI 2 and Local Plan Policy SP4.

### **Carbon Offset Contribution**



- 8) The development hereby approved shall not be occupied until a payment of £7,454.65 towards carbon reduction measures in Haringey has been paid to the Council's Carbon Management Team to bring the level of carbon reduction from the site in line with the London Plan Policies 5.1, 5.2, 5.3, 5.7, 5.8, 5.9, 5.10, and 5.11; The Publication London Plan (2020) Policy SI 2; and Local Plan Policy SP4.

Reason: To ensure the development can comply with Publication London Plan Policy SI2 and Local Plan Policy SP4.

### **Land Contamination**

- 9) Prior to any further work on site:
- a) Using the information already acquired from the submitted Phase I Geo-Environmental Assessment with reference DS-21906G-20-420 proposed by IDOM Merebrook Limited dated October 2020, a site investigation shall be designed for the site using information obtained from 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;
  - d) 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 and to comply with London Plan (2016) policy 5.21 (Contaminated land) and DMDPD Policy DM23.

### **Unexpected Contamination**

- 10) 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.

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

## **CEMP**

- 11) Prior to above ground works, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the local planning authority.

The following applies to above:

- a) The CEMP shall include an Air Quality and Dust Management Plan (AQDMP).
- b) The CEMP shall provide details of how 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 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> where applicable;
  - 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.

Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality and to comply with Policy 5.21 (Contaminated land) of the London Plan (2016) and DMDPD Policy DM23: Environmental Protection.

#### **Drainage / Flooding (FRA)**

- 12) Prior to above ground works, a revised FRA shall be submitted to and approved in writing by the local planning authority. The revised FRA shall provide new rainfall data using Flood Estimation Handbook (FEH) rainfall theory, in accordance with Haringey guidance.

The FRA shall include a completed London Sustainable Drainage pro-forma, as well as evidence that Thames Water have given consent to connect to their network and capacity exists to receive the surface water.

Reason: In order to comply with Policies DM24, 5, 6, & 9 of the Haringey Development Management DPD (2017), policy SP5 of the Local Plan.

#### **Provision & Retention of SuDS**

- 13) Prior to above ground works, Section 4 (Sustainable Drainage Maintenance Strategy) & Appendix B (Proposed Drainage Strategy Drawings) of 'Design Note – Ermine Rd Drainage & Flood Risk 16/12/2020' and the SuDS options it proposes (namely Below Ground Cellular Attenuation & Permeable Paving) shall be provided, maintained in accordance with the associated Maintenance Schedules, and retained for the lifetime of the development except where conditions attached to this planning permission indicate otherwise or where alternative details have been subsequently approved following an application for a non-material amendment.

For the avoidance of doubt, all hardstanding areas shall be permeable.

Reason: In order to ensure a satisfactory provision for drainage on site and ensure suitable drainage provision for the development and comply with Policies DM24, 5, & 6 of the Haringey Development Management DPD (2017), policy SP5 of the Local Plan.

#### **No Light Spill into SINC (Bats)**

- 14) Light from external lighting in the development shall not spill to a harmful extent into the adjacent ecological asset (Tottenham Railsides SINC). Any lighting located near the northwest boundary of the site shall have directional shading to ensure that light spillage into the SINC does not have an undue impact on foraging bats and their habitats.

Reason: In order to ensure bats and their habitats are suitably protected and comply with Policies DM19 (Nature Conservation) of the Haringey Development

Management DPD (2017), policy 7.19 of the London Plan, and Policy G6 of the Publication London Plan.

**Tree protection (SINC/Bats)**

- 15) The existing trees adjacent to the northwest boundary of the site shall not be lopped, felled or otherwise affected in any way (including raising and lowering soil levels under the crown spread of the trees) and no excavation shall be cut under the crown spread of the trees without the prior written permission of the Local Planning Authority.

Reason: In order to ensure bats and their habitats are suitably protected and to safeguard trees in the interest of visual amenity of the area consistent with Policy 7.21 of the London Plan 2016, Policy SP11 of the Haringey Local Plan 2017 and Policies DM1 and DM19 of The Development Management DPD (2017).

**Waste storage delivered and made accessible**

- 16) The waste storage shown on the approved plans shall be delivered and retained for the lifetime of the development except where conditions attached to this planning permission indicate otherwise or where alternative details have been subsequently approved following an application for a non-material amendment.

On occupation of the development - the codes, keys, transponders or any other type of access equipment to the waste store shall be provided to the Council and access to the waste store shall remain unobstructed and within 10m from Ermine Road on collection day.

Reason: In order to ensure waste storage is suitably accessible and to comply with Policy DM4 of The Development Management DPD (2017).

**Secured by Design**

- 17) Prior to occupation of the development, details of full Secured by Design' Accreditation shall be submitted to and approved in writing by the Local Planning Authority. The details shall demonstrate consultation with the Metropolitan Police Designing Out Crime Officers. The development shall be carried out in accordance with the approved details and maintained thereafter for the lifetime of the development.

Reason: To ensure safe and secure development and reduce crime and to comply with Publication London Plan Policy D11 and DMDPD Policy DM2.

**Culvert protection**

- 18) If, during development, a culverted main river previously not identified is found to be present under, or within 4m of, the site then no further development shall be carried out until a condition survey has been completed and a strategy put in

place to protect the culvert. The strategy will be submitted to and approved in writing by, the local planning authority (in consultation with the Environment Agency), and shall be implemented as approved. The strategy will include the following components;

- Details of the location, depth, and structural condition of the culvert.
- Plans to repair any damage the culvert to ensure structural stability for the lifetime of the development.
- Details of how work will be carried out on site without damaging the structure, or impeding the function of, the culvert (including loading calculations).

Reason: To reduce the risk of flooding to the proposed development and future occupants, ensure the structural integrity of the existing flood defences and reduce the risk of flooding from blockages to any existing culvert in accordance with Policy DM28: Protecting and Enhancing Watercourses and Flood Defences.

### **Informatives:**

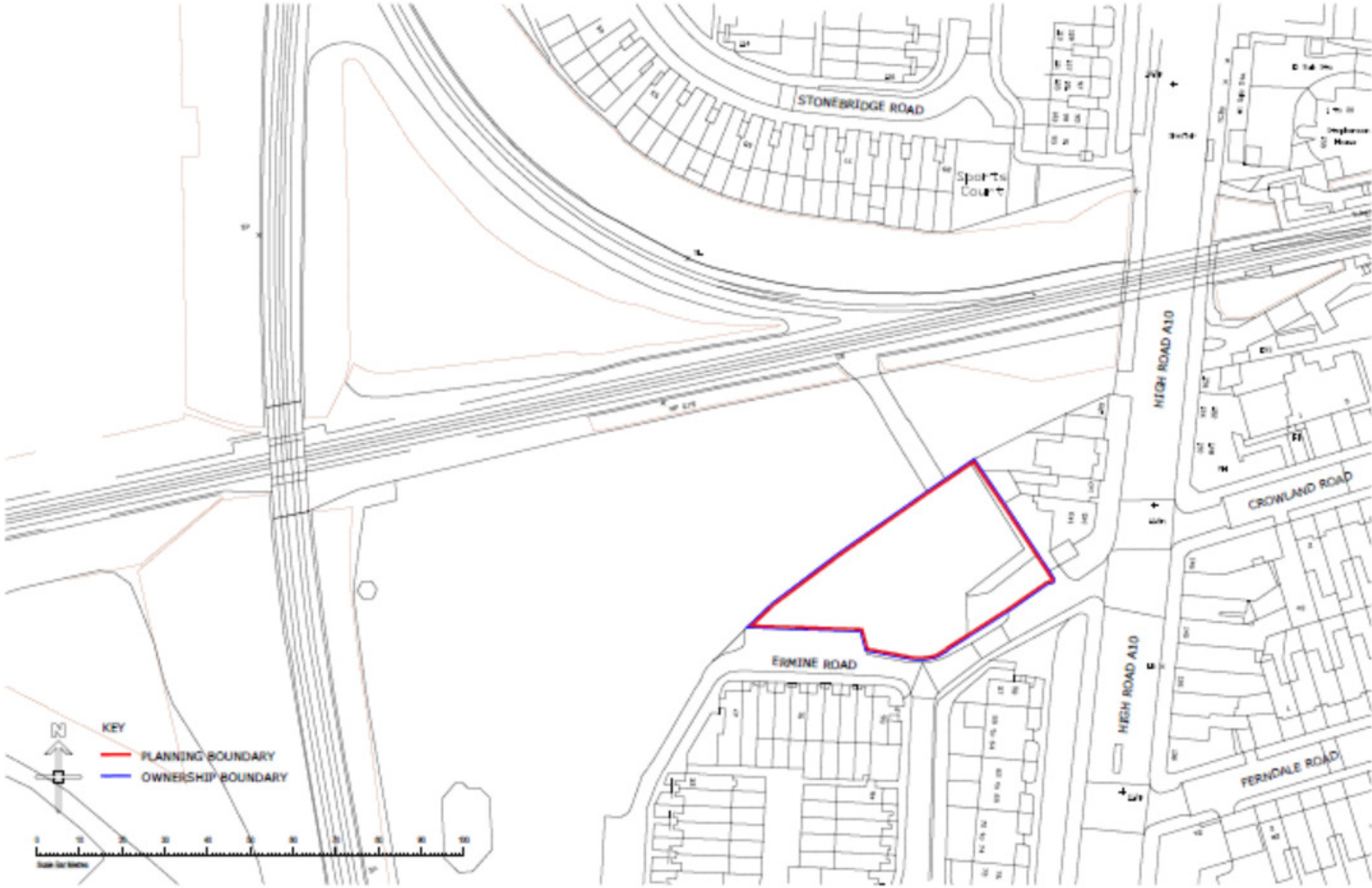
- 1) **INFORMATIVE :** In dealing with this application, Haringey Council has implemented the requirements of the National Planning Policy Framework and of the Town and Country Planning (Development Management Procedure) (England) (Amendment No.2) Order 2012 to foster the delivery of sustainable development in a positive and proactive manner.
- 2) **INFORMATIVE :** CIL  
Based on the information given on the plans, the Mayoral CIL charge will be £54,720 (912sqm x £60.55) and the Haringey CIL charge will be £19,061 (912sqm x £20.90). This would be charged in accordance with the CIL Charging Schedule and any eligible relief and includes indexation in line with the RICS CIL Index.
- 3) **INFORMATIVE :** Hours of Construction Work: The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours:-
  - 8.00am - 6.00pm Monday to Friday
  - 8.00am - 1.00pm Saturday
  - and not at all on Sundays and Bank Holidays.
- 4) **INFORMATIVE :** Party Wall Act: The applicant's attention is drawn to the Party Wall Act 1996 which sets out requirements for notice to be given to relevant adjoining owners of intended works on a shared wall, on a boundary or if excavations are to be carried out near a neighbouring building.
- 5) **INFORMATIVE :** The new development will require numbering. The applicant should contact the Local Land Charges at least six weeks before the development is occupied (tel. 020 8489 5573) to arrange for the allocation of a suitable address.
- 6) **INFORMATIVE :** The London Fire Brigade strongly recommends that sprinklers are considered for new developments. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers, and can reduce the risk to life. The Brigade opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupier.
- 7) **INFORMATIVE :** With regards to surface water drainage, it is the responsibility of a developer to make proper provision for drainage to ground, water course, or a suitable sewer. In respect of surface water, it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to

a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

- 8) **INFORMATIVE** : 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 Water pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 9) **INFORMATIVE** : A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk) . Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.
- 10) **INFORMATIVE** : The proposed development is located within 15 metres of Thames Water underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures (<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes>). Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto: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
- 11) **INFORMATIVE** : The applicant should be aware that the application site is identified as an Area of Surface Interest in the 2015 Crossrail 2 Safeguarding Directions. In the event of a decision to progress the Crossrail 2 project the land may be subject to compulsory purchase in order to provide a worksite for the future delivery of the Crossrail 2 scheme.
- 12) **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](mailto:docomailbox.ne@met.police.uk) or 0208 217 3813.

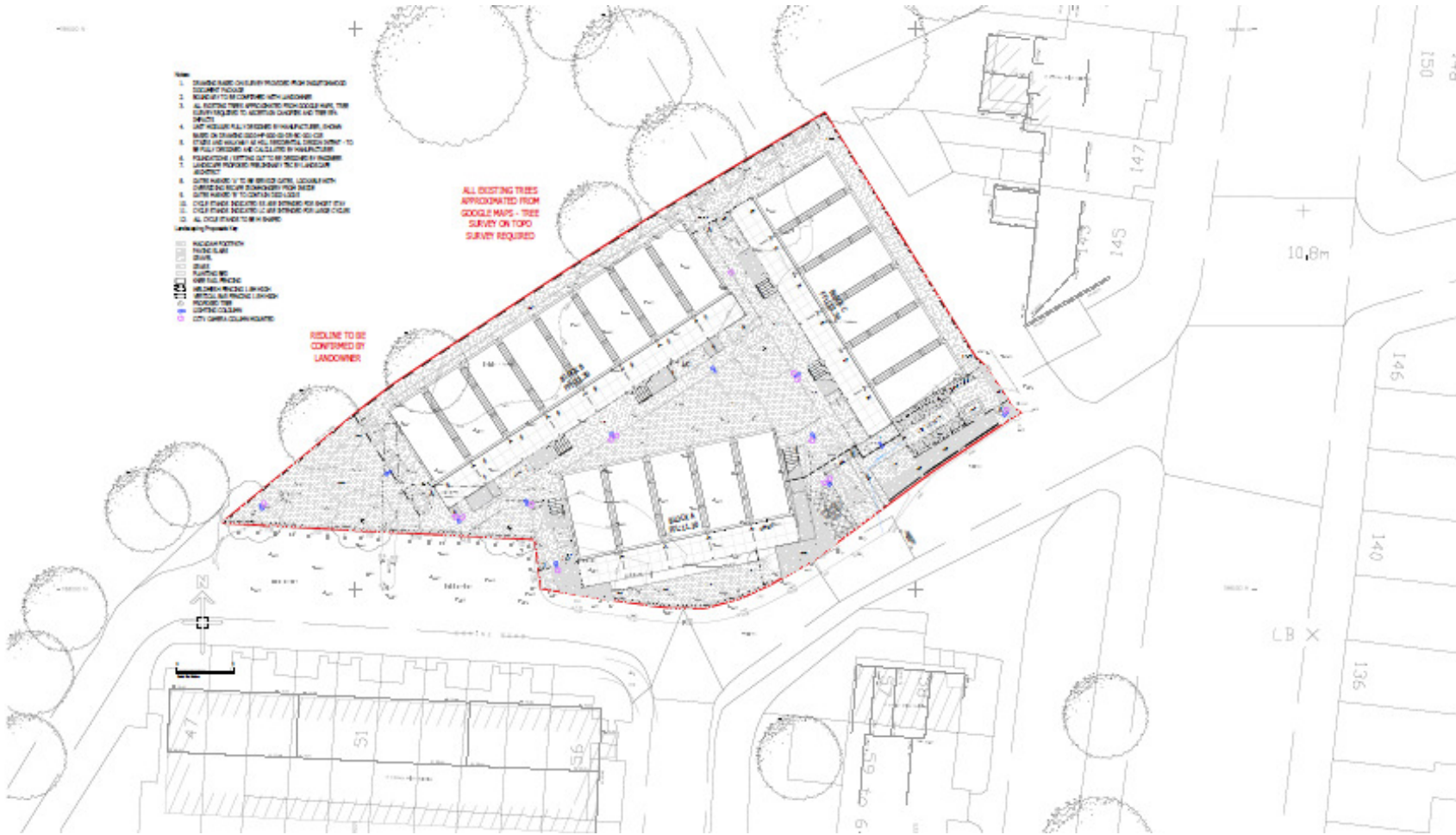
**Appendix 2 Plans and Images**

**Location Plan**

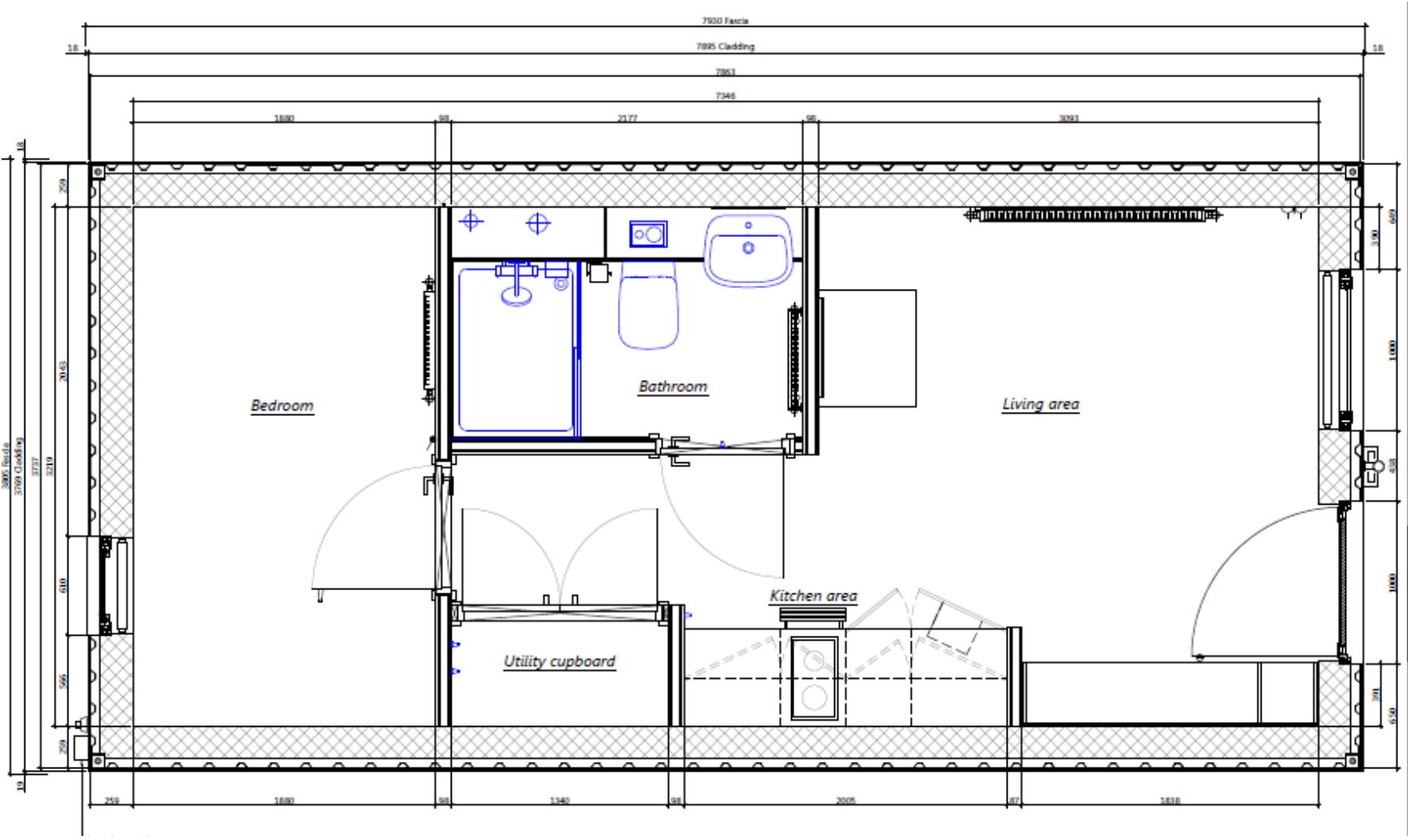




# Site Plan



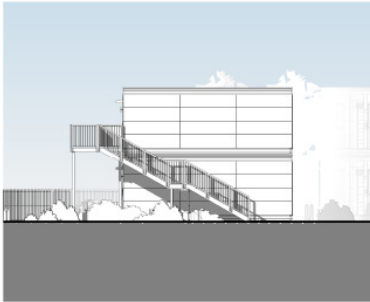
Indicative room layout



# Block A Elevation



① Block A Front Elvation / Ermine Rd Section  
1 : 100



② Block A Right Elevation  
1 : 100



③ Block A Rear Elevation  
1 : 100



④ Block A Left Elevation  
1 : 100



Client:  
148 Residential | 10/20/21

**Block B**



① **Block B Front Elevation / Site Section A**

1 : 100



② **Block B Right Elevation**

1 : 100



③ **Block B Rear Elevation**

1 : 100

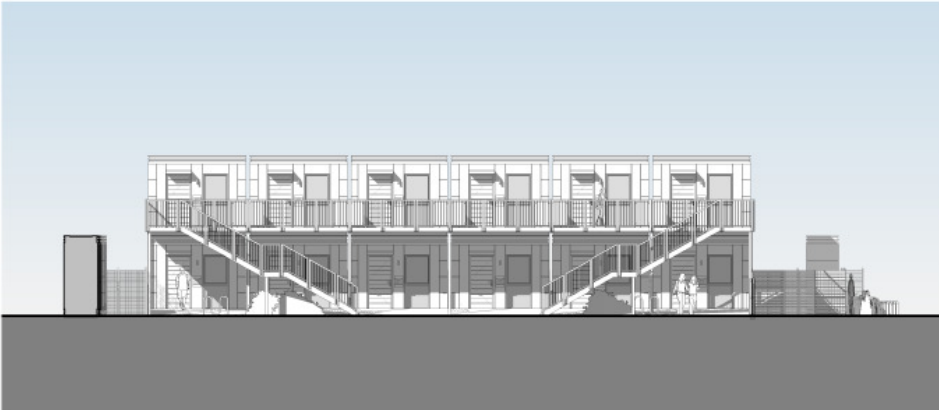


④ **Block B Left Elevation**

1 : 100



Block C



① Block C Front Elevation / Site Section B  
1 : 100



② Block C Right Elevation  
1 : 100



③ Block C Rear Elevation  
1 : 100



④ Block C Left Elevation  
1 : 100

Render of view from Crowland Road / High Road



View from Ermine Road looking East



View from Ermine Road looking North





View from High Road looking northwest



### Appendix 3 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Design	<p><u>HGY/2020/2794</u> - Land to the North of Ermine Road, London N15  <i>Temporary planning permission for a period of 7 years to provide 38 modular residential homes for use as accommodation for the homeless with associated cycle storage and refuse storage.</i></p> <p>Thank you for asking me for my comments on the above. I have been included in discussions on this proposal since the pre-app stage and am familiar with the site after discussing earlier proposals including the outline permission granted for residential development on the neighbouring green space.</p> <p>The site is an area of hardstanding located between commercial properties facing Tottenham High Road to the east, the Ermine Road estate, 1970s council housing, to the south, and the Ermine Triangle green space to the north-west. This is an area of leftover land originally intended, when the railways were built in the late nineteenth century, for a connecting rail loop between two crossing railways (both now parts of the London Overground passenger network); the Liverpool Street to Enfield Town line about 100m to the west and the Gospel Oak to Barking line about 40m to the north. No proposals have ever been made for constructing such a loop, nor are any likely, as such a link would not be necessary. There is already a link from the Barking line to the Enfield Town line, used for only occasional freight.</p> <p><b><u>Principle of Development</u></b></p> <p>The green space adjoining the application site to the north-west, along with the railway tracks an similar green triangles on the other sides of both tracks, have been designated for nature conservation in Haringey's Local Plan, as Ecological Corridor and Site of Importance for Nature Conservation (SINC) Grade II, but these designations do not apply to this application site, merely to the land adjoining its north-western boundary. There are also no</p>	<ul style="list-style-type: none"> <li>• Noted</li> </ul>

Stakeholder	Question/Comment	Response
	<p>other planning designations applicable to this site or any of its immediate surroundings, not is the site designated for development. It is, however, considered a potentially developable piece of brownfield land subject to normal planning policies applicable to any other developable plot. The neighbouring greenspace is privately owned and is in principle developable, provided the biodiversity value can be maintained, and outline planning permission has previously been granted (on appeal) for a modest residential development on the part of the site near this application site. There is also a small plot of land, currently in use as a vehicle mechanics, at the back of the nearest property on Tottenham High Road, immediately adjoining the north-eastern side of the application site, separating it from the shops, with flats above, in Victorian three storey sopping parade buildings facing the High Road.</p> <p>The proposals are for temporary housing using units manufactured off-site, in modular, self contained, single bedroom, single person units. The proposed housing will act as a first step for homeless people, with on site management, advice and assistance. The site is suitable for residential development in principle, adjoining existing housing to the south, and has the facilities and connections available on Tottenham High Road just to the east with Seven Sisters Station and the West Green Road town centre a short walk to the north, and South Tottenham Overground Station an even shorter walk just across the High Road, which make it particularly suited to specialist, supported housing of this sort. However, the site is only available for temporary development, being safeguarded for future use to construct Crossrail 2, and the modular, off-site manufactured design is suitable for dismantling and relocating to another site should Crossrail (or another proposal) go ahead requiring access to the development. Off-site manufactured buildings are probably the only sorts of technology that could be used to build on this site whilst allowing for its to be vacated in only a short number of years, with the investment in essential housing not being lost.</p> <p><b>Form &amp; Pattern of Development</b></p>	

Stakeholder	Question/Comment	Response
	<p>The form of the proposal is in many ways driven by the progressive construction concept of Off-Site Manufacture and Assembly, with the development designed to be largely manufactured as a series of “pods” in a factory, each the size of the individual one bedroom units. These will be delivered to site and joined together in three, two storey rows of five, six and eight units each, giving 37 one-bed flats and one office. Each has a balcony access to the upper floor flats; that also provide a sheltered outdoor threshold space to the ground floor flats beneath them. The rows are laid out around the edge of the site, creating a central communal amenity and outdoor meeting place, well overlooked by two storeys of flats on two sides; the rows on the north-east and north-west side (Blocks B and C respectively) back onto their boundaries with the private sides of these neighbours, whilst the front Block A faces the street, Ermine Road, with its’ back facing the central communal space.</p> <p>Paths, entrances and site enclosure reinforce this simple layout to create a clear and logical spatial hierarchy, from the public street frontage, with just four of the flats opening off this, as well as the site office, but with the five upper floor flats of Block A also looking onto this, with a clear single gate-controlled entrance, located between Blocks A ad B, beside the site office. Block A is modestly set back form the pavement edge along Ermine Road (which itself would be improved from the narrow, inconsistent present pavement), with a zone of defensible space between the flats and the street, but this will make a significant contribution to improving animation and liveliness to the street. The rest of the site layout and enclosure will provide clear, secure boundaries, avoiding creating unobserved ambiguous corners and providing a clear pedestrian route from street to site entrance and site entrance to flat entrance, with stairs to access balconies to 1<sup>st</sup> floor flats all opening off and clearly visible from the central space. Services, storage and refuse are located conveniently but unobtrusively to reinforce the clear, logical and secure site layout.</p> <p><b>Bulk, Massing &amp; Landscaping</b></p>	

Stakeholder	Question/Comment	Response
	<p>The proposals' height is limited to two storeys and the length of the three blocks limited to five, six and eight units, broken down by a clear rhythm into short units, make it clearly within and below the prevailing height and bulk of the surroundings. The central space will provide a convivial communal meeting and amenity space, benefiting from grassed and paved areas to provide a variety of external amenity in addition to the "stoop" private external amenity outside each flat's front door. The western edge of the site, where it narrows down to an acute angle, will in contrast be landscaped with trees and bushes to compliment and extend the more wild, natural landscaping of the green space of the railway triangle to the north-west.</p> <p><b><u>Elevational Treatment, Fenestration, including Balconies</u></b></p> <p>The three rows will have a strongly rhythmic appearance to their main long front and back elevations, formed by their repeating module of windows, and blocks of coloured panels representing each individual flat, contrasting with darker panels between and above flats, which are also used for the whole of the much shorter, blank, end elevations. The rhythm of windows and doors, panels and colours, will provide an attractive elevational / fenestration pattern of a comparable scale and proportion to the ordinary domestic surroundings, whilst being clearly of contemporary appearance expressing its progressive modern construction.</p> <p>Balconies providing access to the first floor flats, as well as their outdoor amenity space, will form an important part of the developments' appearance and add to the liveliness and animation of the scheme. The balconies are over 2m deep, providing space for both circulation and private outdoor amenity. On design officer advice, solid panels have been added to the balcony balustrading, in the same material as the side panelling, to break up the length of the balconies, provide some privacy to first floor residents and hide any clutter on those balconies.</p>	

Stakeholder	Question/Comment	Response
	<p><b><u>Conclusions</u></b></p> <p>The proposals will provide much needed housing for a section of the community where the need is amongst the greatest, in a site for which residential development is suitable, but that is otherwise in danger of being blighted by its Crossrail 2 Safeguarding. It also provides an exemplary example of Modern Methods of Construction, off site manufacture and pre-fabrication, in a form that is of gentle density and appearance, compatible with the varied but mostly residential context. The design will provide a secure, safe and clearly defined boundary and definition of public, private communal and private space, with active street frontage. Green landscaping proposed for the site will soften its appearance and be compatible with the neighbouring site of nature importance.</p>	
<p><b>Conservation</b></p>	<p><b><u>HGY/2020/2794 - Land north of Ermine Road, N15 6DD - Update</u></b></p> <p>The proposed development falls within the setting of the Seven Sisters/Page Green Conservation Area. The submitted image shows the proposed development from the corner of Crowland Road and the High Road, opposite (south) of the locally listed Dutch House and just outside the conservation area.</p> <p>The proposed development will only be partially visible from the southernmost part of the conservation area, as it will be mostly screened by the terrace on the western side of the High Road. Due to its mass and scale, it will be consistent with the surrounding townscape and will not detract from it. Therefore, it will not have a negative impact on the significance of the conservation area and associated heritage assets, including the locally listed Dutch House.</p> <p>There is no objection from a conservation perspective. However, it would be desirable the materials and colour palette of the development to reflect materials used in the local area, rather than contrast with them. In addition, there is an opportunity to create an</p>	<ul style="list-style-type: none"> <li>• No harm has been identified and the scheme is therefore acceptable in this regard.</li> <li>• The Conservation Officer has noted that it would be desirable for the materials and colour palette of the development to reflect materials used in the local area, rather than contrast with them. However, this method of construction would not allow brick or a brick cladding panel to be used. Furthermore, the scale of the building would be modest and its siting (with the larger two blocks set back in the site) would mean that the building would have an acceptable appearance.</li> </ul>

Stakeholder	Question/Comment	Response
	attractive and carefully designed frontage onto Ermine Road and that could be further explored.	
<b>Transportation</b>	<p>I would suggest condition for the following:</p> <ol style="list-style-type: none"> <li>a. Construction Management Plan (CMP) – this will help resolve issues raised in my comments regarding CLP in email below.</li> <li>b. Deliver and Servicing Management Plan – this will help formalise arrangement informed by appropriate vehicular swept paths, accurate location of bollards including arrangements for refuse collection as agreed by Martin Lester.</li> <li>c. S106 / s278 agreement for highway works – this would help resolve issues raised in my email dated 18/12/20 regarding: <ol style="list-style-type: none"> <li>i. Car free / car capped s106 agreement to restrict eligibility of all occupiers from obtaining CPZ parking permits and payment (£4000) for amending the CPZ TMO accordingly.</li> <li>ii. highway boundaries – to clearly identify where highway including CS1 may be affected by proposals,</li> </ol> </li> </ol>	<ul style="list-style-type: none"> <li>• A condition is recommended which would ensure that the development would not be occupied other than through a lease/license that ensures that residents are obligated not to apply for a parking permit for any CPZ.</li> <li>• A parking space is provided for deliveries and emergency vehicles and a condition is recommended to ensure it is only used as such.</li> <li>• There would be a deficit of 1 space from the minimum which is acceptable given the specialist nature of the housing and given any further provision would not be sheltered and usable.</li> </ul>

Stakeholder	Question/Comment	Response												
	<p>iii. status of road along site frontage (Red Route / Highway Authority),</p> <p>iv. relocation / removal of existing bollards (if necessary for parking spaces to operate),</p> <p>v. allowing for highway improvements / reinstatement of redundant crossovers and</p> <p>vi. provision of public footway along site frontage to be designed, funded and implemented, in consultation with TfL.</p> <p>Transport demands and provision for the proposed housing scheme for homeless people are expected to be different from those associated with conventional housing. I also appreciate that there are funding constraints that limit scope of highway works. Under these circumstance, some flexibility could be exercised in provision for car parking, and provision for servicing and deliveries, however, I consider that the proposed development warrants improved provision for footways along the site frontage and this should allow for reinstatement of existing redundant crossovers / dropped kerbs.</p>	<ul style="list-style-type: none"> <li>• Construction Management/Logistics Plan required by Condition</li> <li>• The proposed development does not propose any highway works. In the absence of any works being made to the highway, a s278 agreement would not be required.</li> <li>• A request has also been made for the development to deliver highway improvements and provide a public footway along the site frontage, so that the northern side of Ermine Road has a continuous footway connecting to the High Road. Given the temporary nature of the development the improvements could be superseded after the 7 year period, so it is unreasonable and unnecessary for the development to provide this.</li> </ul>												
<p><b>Carbon Management (Energy, offset, overheating, sustainability)</b></p>	<p><b>Carbon Management Response 16/12/2020</b></p> <p>On 15/12/2020, the applicant submitted a revised Carbon Reduction Statement – ModulHaus Ermine Road (dated December 2020).</p> <p>It confirms:</p> <ul style="list-style-type: none"> <li>- The use of SAP10 and SAP10.1 carbon factors; only SAP10 carbon factors will be used within the reporting.</li> <li>- Based on SAP10, the energy hierarchy is:</li> </ul> <table border="1" data-bbox="651 1267 1420 1393"> <thead> <tr> <th data-bbox="651 1267 1039 1299"></th> <th colspan="2" data-bbox="1039 1267 1420 1299">Residential</th> </tr> <tr> <th data-bbox="651 1299 1039 1331"></th> <th data-bbox="1039 1299 1182 1331">tCO<sub>2</sub></th> <th data-bbox="1182 1299 1420 1331">%</th> </tr> </thead> <tbody> <tr> <td data-bbox="651 1331 1039 1362"><b>Baseline emissions</b></td> <td data-bbox="1039 1331 1182 1362">27.43</td> <td data-bbox="1182 1331 1420 1362"></td> </tr> <tr> <td data-bbox="651 1362 1039 1393"><b>Be Lean savings</b></td> <td data-bbox="1039 1362 1182 1393">4.6</td> <td data-bbox="1182 1362 1420 1393">16.81%</td> </tr> </tbody> </table>		Residential			tCO <sub>2</sub>	%	<b>Baseline emissions</b>	27.43		<b>Be Lean savings</b>	4.6	16.81%	<ul style="list-style-type: none"> <li>• Conditions have been recommended which require this.</li> </ul>
	Residential													
	tCO <sub>2</sub>	%												
<b>Baseline emissions</b>	27.43													
<b>Be Lean savings</b>	4.6	16.81%												



Stakeholder	Question/Comment			Response
	<b>Be Clean savings</b>	0	0%	
<b>Be Green savings</b>	11.6	42.3%		
<b>Cumulative savings</b>	16.2	59.1%		
<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	11.21			
<b>Carbon offset contribution</b>	£95 x 7 years x 11.21 tCO <sub>2</sub> /year = £7,454.65			
<ul style="list-style-type: none"> <li>- A carbon offset contribution of <b>£7,454.65</b></li> <li>- Energy demand of the development at 22.26 MWh/year</li> <li>- MVHR efficiency of 81%</li> <li>- The ASHPs will not be used for active cooling</li> <li>- ASHP with a SCoP 2.6</li> </ul> <p><b>Proposed Planning Condition</b></p> <p><b>Energy Strategy</b> The development shall be constructed in strict accordance with the Carbon Reduction Statement – ModulHaus Ermine Road prepared by Volumetric Modular Ltd (dated December 2020), Overheating, MVHR, ASHP Technical Information Report prepared by Hill (dated 5 October 2020), and the TM59 Overheating Study prepared by The Richards Design Partnership (dated November 2020). This shall include the agreed carbon reduction of 59% beyond a Building Regulations 2013 compliant building (with SAP10 carbon factors). The energy efficient materials and air source heat pumps shall be maintained for the period of 7 years.</p> <p>Confirmation of this must be submitted to the local authority at least 6 months of completion on site for approval and the applicant must allow for site access if required to verify delivery.</p> <p>The Council should be notified if the applicant alters any of the measures and standards set out in the approved energy strategy. Any alterations should be presented with justification and new standards for approval by the Council. Should the agreed target not be able to be achieved on site through energy measures as set</p>				

Stakeholder	Question/Comment	Response
	<p>out in the aforementioned strategy, then any shortfall should be offset at the cost of £2,850 per tonne of carbon.</p> <p><b>Reason:</b> To ensure the development can comply with the Energy Hierarchy in line with London Plan 2016 Policy 5.2, draft New London Plan (Intend to Publish) Policy SI2 and Local Plan Policy SP4.</p>	
<p><b>Carbon Management (Pollution – Contamination &amp; Air Quality)</b></p>	<p><b><u>Re: Planning Application HGY/2020/2794 on Land to the North of Ermine Road N15</u></b></p> <p>Thanks for contacting the Carbon Management Team (Pollution) regarding the above planning application for temporary planning permission for a period of 7 years to provide 38 modular residential homes for use as accommodation for the homeless with associated cycle storage and refuse storage and I will like to comment as follows.</p> <p>Having considered all the submitted supportive information most especially, the planning statement prepared by Sphere 25 Planning Consultancy Ltd dated November 2020 taken note of the fact that (the site is bordered by a designated ecological corridor with plan for some landscaped amenity area in the centre overlooked by all units with grassed areas/soft landscaping including a new central grassed areas and the fact that the warranty of the modular buildings will not allow the provision of PV panels), Overheating, MVHR, ASHP Technical Information Report dated 5<sup>th</sup> October 2020 taken note of the (use of community heating) and Phase I Geo-Environmental Assessment with reference DS-21906G-20-420 prepared by IDOM Merebrook Limited dated October 2020 taken note of (Sections 2.2.3, 2.2.7, 2.2.10, 2.3.2, 2.3.3, 2.13.3 and 3 (Conclusions) as well as Table 2: Summary of the key features shown on historic maps and Table 4: Preliminary Conceptual Model), <b>please be advise that we have no objection to the development in relation to AQ and Land Contamination but the</b></p>	<ul style="list-style-type: none"> <li>• Conditions have been recommended which require this.</li> </ul>

Stakeholder	Question/Comment	Response
	<p>following planning conditions and informative are recommend should planning permission be granted.</p> <p><b>1. <u>Land Contamination</u></b>  Before development commences other than for investigative work:</p> <ol style="list-style-type: none"> <li>a. Using the information already acquired from the submitted Phase I Geo-Environmental Assessment with reference DS-21906G-20-420 proposed by IDOM Merebrook Limited dated October 2020, a site investigation shall be designed for the site using information obtained from 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.</li> <li>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.</li> <li>c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and;</li> <li>d. 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.</li> </ol> <p><b>Reason:</b> To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p><b>2. <u>Unexpected Contamination</u></b>  If, during development, contamination not previously identified is found to be present at the site then no further development (unless</p>	

Stakeholder	Question/Comment	Response
	<p>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.</p> <p><b>Reasons:</b> 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.</p> <p><b>3. <u>Construction Environmental Management Plans</u></b></p> <p><b>a.</b> Development shall not commence (other than demolition) where applicable until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.</p> <p>The following applies to above:</p> <p>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:</p> <p>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;</p>	

Stakeholder	Question/Comment	Response
	<p>vii. Details of any acoustic hoarding;</p> <p>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</p> <p>ix. Details of external lighting; and,</p> <p>x. Details of any other standard environmental management and control measures to be implemented.</p> <p>c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:</p> <p>i. Monitoring and joint working arrangements, where appropriate;</p> <p>ii. Site access and car parking arrangements;</p> <p>iii. Delivery booking systems;</p> <p>iv. Agreed routes to/from the Plot;</p> <p>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</p> <p>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</p> <p>vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.</p> <p>d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:</p> <p>i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;</p> <p>ii. Details confirming the Plot has been registered at <a href="http://nrmm.london">http://nrmm.london</a> where applicable;</p> <p>iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;</p> <p>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);</p> <p>v. A Dust Risk Assessment for the works; and</p> <p>vi. Lorry Parking, in joint arrangement where appropriate.</p>	

Stakeholder	Question/Comment	Response
	<p><b>Reason:</b> To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.”</p>	
<p><b>Nature Conservation / Ecology</b></p>	<p>Report has highlighted:</p> <ol style="list-style-type: none"> <li>1. There is negligible ecological interest on the site and no remaining scope for protected species to use the site in any significant way. However, bats are known to be present foraging within the Tottenham Railsides SINC and ensuring the risk of light spill onto the SINC is minimised by careful placement of any external lighting and ensuring directional shading. The SINC is though directly adjacent and young and semi-mature trees are close to the site. Care should be taken not the damage the root zones or the canopies of these trees.</li> <li>2. The report has already set out measures required to ensure protection of the existing adjacent trees safeguarding the Root Protection Zones from disturbance and compaction. The external lighting design along the northern boundary needs to minimise light spill into the adjacent SINC.</li> </ol> <p>Mitigating measures necessary to protect the adjacent SINC, namely:</p> <ul style="list-style-type: none"> <li>• Establish root protection zones and canopy protection for boundary trees within the SINC;</li> <li>• Ensure light spill onto the SINC is minimised by controlling light placement and design;</li> <li>• Provide a robust fence for the SINC to ensure access is restricted.</li> </ul>	<ul style="list-style-type: none"> <li>• Conditions have been recommended which require this.</li> </ul>

Stakeholder	Question/Comment	Response
	<p>I am happy with the report and mitigating measures proposed and would suggest these are conditioned into the development.</p>	
<p><b>Waste</b></p>	<p>RE: Planning Application HGY/2018/2794</p> <p>LOCATION: Land to the North of Ermine Road N15</p> <p>Further to your request concerning the above planning application I have the following comments to make:</p> <p style="padding-left: 40px;">Street-based households receiving kerbside collection services require space for the 'Standard kerbside collection full set' to be left for collection within the area of the property as close as possible to the access point to the property for collection teams. Details of the 'Standard kerbside collection full set' are given below.</p> <p><b>x</b> Wheelie bins or bulk waste containers must be provided for household collections.</p> <p style="padding-left: 40px;">Wheelie bins must be located no further than 25 metres from the point of collection.</p> <p><b>x</b> Bulk waste containers must be located no further than 10 metres from the point of collection.</p> <p><b>x</b> Route from waste storage points to collection point must be as straight as possible with no kerbs or steps. Gradients should be no greater than 1:20 and surfaces should be smooth and</p>	<ul style="list-style-type: none"> <li>• A condition is attached which would require the codes, keys, transponders or any other type of access equipment to be provided to the Council and for the access to the waste storage to remain unobstructed and within 10m from Ermine Road on collection day. This would ensure suitable provision is provided.</li> </ul>

Stakeholder	Question/Comment	Response
	<p>sound, concrete rather than flexible. Dropped kerbs should be installed as necessary.</p> <p><b>x</b> If waste containers are housed, housings must be big enough to fit as many containers as are necessary to facilitate once per week collection and be high enough for lids to be open and closed where lidded containers are installed. Internal housing layouts must allow all containers to be accessed by users. Applicants can seek further advice about housings from Waste Management if required.</p> <p><b>x</b> Waste container housings may need to be lit so as to be safe for residents and collectors to use and service during darkness hours.</p> <p><b>x</b> All doors and pathways need to be 200mm wider than any bins that are required to pass through or over them.</p> <p><b>x</b> If access through security gates/doors is required for household waste collection, codes, keys, transponders or any other type of access equipment must be provided to the council. No charges will be accepted by the council for equipment required to gain access.</p> <p>Waste collection vehicles require height clearance of at least 4.75 metres. Roads required for access by waste collection vehicles must be constructed to withstand load bearing of up to 26 tonnes.</p> <p><b>x</b> Adequate waste storage arrangements must be made so that waste does not need to be placed on the public highway other than immediately before it is due to be collected. Further detailed advice can be given on this where required.</p> <p><b>x</b> Other comments as follows:</p> <p>Proposal: Temporary planning permission for a period of 7 years to provide 38 modular residential homes for use as</p>	



Stakeholder	Question/Comment	Response
	<p>accommodation for the homeless with associated cycle storage and refuse storage.</p> <p>This application will need the following</p> <p>5 x 1100L waste receptacle for refuse 3 x 1100L waste receptacle for dry recycling</p> <p>This application does not confirm the following points.</p> <ul style="list-style-type: none"> <li>• Bulk waste containers must be located no further than 10 metres from the point of collection.</li> <li>• Route from waste storage points to collection point must be as straight as possible with no kerbs or steps. Gradients should be no greater than 1:20 and surfaces should be smooth and sound, concrete rather than flexible. Dropped kerbs should be installed, as necessary.</li> <li>• Waste collection vehicles must be able to enter and exit the development using forward motion gears.</li> <li>• Also check all comments provide above and below are followed.</li> </ul> <p>The above planning application has been given a RAG traffic light status of AMBER for waste storage and collection.</p>	
<p><b>Lead Local Flood Authority (LLFA) - Drainage / Flooding (SuDS)</b></p>	<p>We've now reviewed the drawing and the FRA, for this proposed site, the LLFA, have a couple of points to make. The rainfall data in the Micro-drainage report needs to be FEH, and not FSR, as this doesn't provide the most up to date data, this will need to be updated as per the Haringey, guidance and re-submitted.</p> <p>A completed pro-forma will need to be provided in due course, and evidence that Thames Water, have given consent to connect to their network and capacity exists to receive the surface water.</p> <p>Confirmation will need to be provided with regards to the units not being placed within 8m, of the culvert as per the advice given by the EA.</p>	<ul style="list-style-type: none"> <li>• Conditions have been recommended which require this.</li> </ul>

Stakeholder	Question/Comment	Response
	<p>The LLFA, accept in principal the proposed controlled discharge rate of 5 l/s, and the proposed SuDS, solutions that include an attenuation system and permeable paving throughout the site. A comprehensive management maintenance schedule has been provided that will see the system function effectively for the duration of the site.</p> <p>The LLFA, are happy for the proposal to proceed at this stage.</p>	
<b>EXTERNAL</b>		
<b>Environment Agency (EA)</b>	<p>Based on our review of the submitted documents we object to this application due to its proximity (within 3 metres) to a culverted main river, the Stonebridge Brook. As submitted, it is unlikely that we would grant a flood risk activity permit for this application.</p> <p><i>Since this initial objection discussions between the applicant and the EA have been ongoing. Condition 18 has been drafted to resolve the issue but at the time of drafting the report the EA have not yet confirmed if it meets their requirements.</i></p>	<ul style="list-style-type: none"> <li>• The applicant has employed consultants to survey the area who have only located a Thames Water surface water sewer network which is 23.9m away at its closest point. The survey information indicates that no other subterranean waterways have been located closer to the boundary. The applicant has contacted Thames Water to see if they can confirm that the sewer is the adopted watercourse – A response to this has not yet been received.</li> <li>• This has been provided to the EA who expect to withdraw their objection and impose a condition if necessary.</li> <li>• Condition 18 is recommended as a fallback.</li> <li>• An update on this matter will be provided as an addendum to this report.</li> </ul>

Stakeholder	Question/Comment	Response
<p><b>London Fire Brigade</b></p>	<p>The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.</p> <p>The Commissioner has been consulted with regard to the above-mentioned premises and makes the following observations: The Commissioner is not satisfied with the proposals for fire fighting access.as access does not meet the requirements of part B5 of the building regulations.</p> <p>---</p> <p>We need to get to within 45 meters of fire hose length to the farthest room on the farthest block and from the plans we can not or they may have to provide sprinklers throughout all blocks</p>	<ul style="list-style-type: none"> <li>• The applicant has provided a drawing which indicates that this would be possible, and this has been provided to the LFB for further comment</li> <li>• An update on this matter will be provided as an addendum to this report.</li> </ul>
<p><b>Designing out Crime Officer (Metropolitan Police)</b></p>	<p>With reference the above application we have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. 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.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>We have met with the project Architects and Haringey Team regarding the development to discuss Crime Prevention and Secured by Design (SBD) for the overall site and are satisfied that the development aims to achieve SbD accreditation ensuring the safety and security of the occupants of the development. At this</p>	<ul style="list-style-type: none"> <li>• A Condition is recommended that a 'Secured by Design' accreditation shall be obtained for the development prior to occupation and the features that are agreed to be necessary for security are retained for the lifetime of the development. This would ensure that the development is safe and secure and would reduce crime and the fear of crime.</li> </ul>

Stakeholder	Question/Comment	Response
	<p>point it can be difficult to design out any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.</p> <p>In principle we have no objections to the site as long as proportionate measures are placed to satisfy any concerns over the overall layout of the development and its effect on the local community and the residents of the development.</p> <p>We have recommended the attaching of suitably worded conditions and an informative offering recommendations to minimize crime and the fear of crime within the development and the local community.</p> <p>The comments made can be easily mitigated if the Architects or Managing Agency were to maintain and open dialogue regarding the project prior to completion, throughout its build and by following the advice given. 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.</p> <p>Section 2 - Secured by Design Conditions and Informative: In light of the information provided, we request the following Conditions and Informative:</p> <p>Conditions: Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained.</p> <p>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</p>	

Stakeholder	Question/Comment	Response
	<p>Charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p> <p>Section 3 - Conclusion:</p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p> <p>Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.</p> <p>Yours sincerely,</p> <p>Lee Warwick 463TP          Designing Out Crime Officer          Metropolitan Police Service</p>	

Stakeholder	Question/Comment	Response
<p><b>Transport for London</b></p>	<ul style="list-style-type: none"> <li>• TfL have no objections to the proposal; they require further information as set out below:</li> </ul> <p><u>Cycle Parking</u></p> <ul style="list-style-type: none"> <li>• 1 cycle parking space should be provided for each home (Total = 37). The applicant should provide at least 2 short-stay cycle parking spaces and at least 5% (2) will need to be provided for larger and adapted cycles.</li> </ul> <p><u>Construction Management/Logistics Plan (CMP/CLP)</u></p> <ul style="list-style-type: none"> <li>• TfL will require a construction logistics plan which highlights: <ul style="list-style-type: none"> <li>- the timeline of construction and</li> <li>- the highway safety strategy along the access roads. And includes:</li> <li>- the delivery times of the construction vehicles and a swept path analysis for crane vehicles carrying the necessary equipment.</li> <li>- construction deliveries outside peak times with allocated delivery slots for site management and vehicles which are recognised in the FORS or similar.</li> <li>- Temporary obstructions during the construction and delivery must be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians or obstruct the flow of traffic on the TLRN.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• There is a shortfall of 1 cycle parking space which is due to insufficient room being available to place another cycle stand beneath the covered walkways. An additional stand would affect accessibility and would not be covered so would not be useable. The shortfall is considered acceptable given the specialist nature of the use which should not require maximum provision and due to it being only a deficiency of 1.</li> <li>• A condition requiring a Construction Management/Logistics Plan (CMP/CLP) to be submitted and approved prior to the craning of the buildings on to the site is recommended.</li> </ul>

Stakeholder	Question/Comment	Response
<p><b>Thames Water</b></p>	<p>Re: LAND TO THE NORTH OF , ERMINE ROAD, LONDON, N15 6DQ</p> <p>Waste Comments  With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices">https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices</a></p> <p>We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing <a href="mailto:trade.effluent@thameswater.co.uk">trade.effluent@thameswater.co.uk</a> . Application forms should be completed on line via <a href="http://www.thameswater.co.uk">www.thameswater.co.uk</a>. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p>	<ul style="list-style-type: none"> <li>• Informatives Added</li> </ul>

Stakeholder	Question/Comment	Response
	<p>The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. “The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide ‘working near our assets’ to ensure your workings are in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.<a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/ Working-near-or-diverting-our-pipes</a>. Should you require further information please contact Thames Water. Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a> Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p>There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes</a>.</p> <p>Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.</p> <p>Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p>	



Stakeholder	Question/Comment	Response
	<p>Water Comments</p> <p>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.</p> <p><a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes</a></p> <p>If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at <a href="https://thameswater.co.uk/buildingwater">thameswater.co.uk/buildingwater</a>.</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application.</p> <p>Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>	

Stakeholder	Question/Comment	Response
<p><b>The Greater London Archaeological Advisory Service (GLAAS)</b></p>	<p><b>Land to the North of Ermine Road London N15</b>  Temporary planning permission for a period of 7 years to provide 38 modular residential homes for use as accommodation for the homeless with associated cycle storage and refuse storage.</p> <p><b>Recommend No Archaeological Requirement</b></p> <p>Thank you for your consultation dated 10 November 2020.</p> <p>The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.</p> <p>NPPF section 16 and the Draft London Plan (2017 Policy HC1) make the conservation of archaeological interest a material planning consideration.</p> <p>Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.</p> <p>In view of the limited groundworks connected with the modular scheme, I do not advise archaeological measures in this case. No further assessment or conditions are therefore necessary.</p> <p>This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.</p>	<ul style="list-style-type: none"> <li>• Noted</li> </ul>

Stakeholder	Question/Comment	Response
<p><b>Natural England</b></p>	<p>Thank you for getting in touch about the above consultation, please find Natural England’s response below.</p> <p>Natural England has no comment on this application with regards to designated sites. However, Natural England notes the importance of Sustainable Urban Drainage Systems (SuDS) and that there may be opportunities for green infrastructure and biodiversity enhancements on the development site.</p> <p>This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the NPPF.</p> <p>Natural England is supportive of the inclusion of living roofs where they are appropriate to developments. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife. We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area.</p> <p>We also highlight paragraphs 163 and 165 of the NPPF which relate to sustainable drainage systems. We encourage use of Sustainable urban Drainage Systems (SuDS) on site, and it may be possible for SuDS measures to provide multifunctional benefits such as biodiversity improvements.</p> <p>Natural England has not assessed this application for impacts on protected species. Natural England has published Standing</p>	<ul style="list-style-type: none"> <li>• Noted – Ecology conditions recommended</li> </ul>

Stakeholder	Question/Comment	Response
	<p>Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.</p> <p>It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.</p> <p>Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available here.</p> <p>Kind regards, Isabella Jack</p> <p>Isabella Jack – Sustainable Development Adviser Thames Solent Team   Natural England</p>	

Stakeholder	Question/Comment	Response
<p><i>[Rail]</i>  <b>Network Rail</b></p> <p><b>London Overground</b></p> <p><b>Crossrail 2 (Safeguarding Direction)</b></p>	<ul style="list-style-type: none"> <li>• Network Rail have no objections to the proposals.</li> <li>• London Overground Infrastructure had no comments on the proposals.</li> <li>• The site is an Area of Surface Interest in the 2015 Crossrail 2 Safeguarding Directions. In the event of a decision to progress the Crossrail 2 project the land may be subject to compulsory purchase to provide a worksite for the future delivery of the Crossrail 2 scheme.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted</li> <li>• Noted</li> <li>• London Plan (2016) Policy 6.4 requires the Mayor will work with strategic partners to improve the public transport system in London by developing Crossrail 2. Publication London Plan Policy T3 under para. D also requires development decisions to give priority to securing and supporting the delivery of Crossrail 2. As the site is safeguarded – only temporary solutions would be realistic on the site given the capital expenditure for any longer term installations. This limits the opportunity for optimising the site and delivering housing. The proposal responds to these constraints with a modular build that provides specialist housing for a specific need.</li> </ul>

#### **Appendix 4 Representations from Neighbours**

- 206 Neighbouring properties were notified of the application and 59 letters of objection have been received. The main objections are listed below with Officer responses listed in the right hand column.
- 1 letter of support has been received which stated the following:
  - *Despite the propaganda from neighbours which includes a note through the door urging all local residents to reject this application, I am pleased to support it. Homeless people need somewhere to live. As the Lord Jesus Himself said 'it is more blessed to give than receive'.*
- A petition against the proposal was also received which indicates that residents from 54 local households wish to object to the proposals. It is understood that some of the signatories wish to remain anonymous, so their names and addresses were not displayed on the public register. Anonymous objections are generally considered to have less weight than those where names and addresses are provided.

<b>Potential for an increase in crime (antisocial behaviour)</b>	
<b><u>Objection</u></b>	<b><u>Response</u></b>
<ul style="list-style-type: none"> <li>• Residents who live near this site are concerned that there could be an increase in anti-social behaviour.</li> <li>• There appears to be no specific plan in place to ensure this does not happen other than the existing structures which are overstretched.</li> </ul>	<ul style="list-style-type: none"> <li>• All occupants would be referred to the service using a robust referral process, led by the Haringey Street Outreach Team and the Council's Homelessness Pathway Team.</li> <li>• There would be no direct access to the service without a prior referral and assessment of suitability. This ensures that vulnerabilities and support needs are explored with each person before they move in. This approach ensures the safety of the occupants as well as that of others.</li> <li>• The site design is intended to reduce opportunities for anti-social behaviour by creating a well-lit and visible environment with appropriate but not invasive CCTV. There would always be a member of staff on site. This would be a support worker in the daytime and a concierge</li> </ul>

	<p>at night. The staff office is positioned with good visibility across the site which would enable the management of visitors to the site at all times.</p> <ul style="list-style-type: none"> <li>• The scheme has also been reviewed by a Designing out Crime Officer at the Metropolitan Police who has stated that they cannot see any reason why the development cannot achieve accreditation according to Secured by Design (SBD) guidelines.</li> <li>• Condition 17 has also been recommended which requires SBD accreditation to be achieved prior to occupation.</li> </ul>
<ul style="list-style-type: none"> <li>• There is little confidence that the site will be managed well in terms of general maintenance - landscaping, refuse collection, car parking but also managing the day to day needs of vulnerable people who live in these units.</li> <li>• Very vulnerable people will be housed here yet there seems to be very little in the way of facilities.</li> </ul>	<ul style="list-style-type: none"> <li>• The homes would be steppingstones to help people transition from rough sleeping. The proposal would give them time to adjust to living in their own place and to develop their independent living skills. Following this they will move on to their own permanent homes.</li> <li>• The service would operate year round and would be staffed 24 hours per day by a combination of specialist support workers and night concierge. The support workers would help to manage the day to day needs of residents whilst also be present to report any issues that may occur in relation to general maintenance.</li> <li>• The homes were designed by Hill architects who worked closely with several leading homeless charities including The Connection at St Martins in the Field on Trafalgar Square. Hill undertook several stakeholder and user group forums to discuss the design in depth.</li> <li>• The units are thoughtfully designed through consultation with individuals who have slept rough or have had experiences of homelessness. They would feel homely and the space would be well utilised.</li> </ul>

<b>Noise &amp; disturbance</b>	
<b><u>Objection</u></b>	<b><u>Response</u></b>
<ul style="list-style-type: none"> <li>• There would be undue noise from the new residents.</li> </ul>	<ul style="list-style-type: none"> <li>• There would always be a member of staff present who could deal with any issues in this regard.</li> </ul>
<ul style="list-style-type: none"> <li>• The build will undoubtedly cause disruption and inconvenience to residents if it commences.</li> </ul>	<ul style="list-style-type: none"> <li>• The construction method would be one of modular build which is significantly quicker than traditional construction and takes a few days.</li> <li>• Condition 6 requires a Construction Management Plan/Logistics Plan to be submitted which would ensure that disruption resulting from construction is minimised.</li> <li>• This will safeguard residential amenity, reduce congestion, and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.</li> </ul>
<b>Impact on neighbouring amenity &amp; parking</b>	
<b><u>Objection</u></b>	<b><u>Response</u></b>
<ul style="list-style-type: none"> <li>• I am concerned for the privacy of my property - said units are facing and directly overlook my house and bedroom windows.</li> </ul>	<p>The orientation of the buildings would minimise overlooking. Block A would be the closest block to the existing properties to the south of Ermine Road.</p> <ul style="list-style-type: none"> <li>• Block A would not directly face the properties to the south of Ermine Road and given the distances between them, the level of overlooking would be commensurate with the character of the locality. The proposed units also have relatively modest windows and given the siting and orientation; the privacy of existing residents would not be adversely affected to a material degree by the proposal.</li> </ul>



<ul style="list-style-type: none"> <li>• This area is too small for more properties and with the parking situation at present</li> </ul>	<ul style="list-style-type: none"> <li>• The site is close to alternative and accessible means of transport, it has a high PTAL, and a Controlled Parking Zone (CPZ) exists near to the site. One parking space would be provided for disabled people in line with Publication London Plan standards. It therefore provides a policy compliant level of parking.</li> <li>• It is highly unlikely given the above and the length of tenancy that residents would own a car. In any event, Condition 4 is recommended which would ensure that the development would not be occupied other than through a lease/license that ensures that residents are obligated not to apply for a parking permit for any CPZ.</li> </ul>
<ul style="list-style-type: none"> <li>• There are already problems with waste management and the proposal would make this worse.</li> </ul>	<ul style="list-style-type: none"> <li>• The proposal provides sufficient waste storage through the provision of a refuse store which holds 5 x 1100L waste receptacles for refuse &amp; 3 x 1100L waste receptacles for dry recycling. The plans indicate that the waste containers would be located no further than 10 metres from the point of collection (which would be on Ermine Road).</li> <li>• The site would also have staff on site 24 hours a day who can respond to any issues relating to missed waste collections or problems related to waste on the site.</li> </ul>
<ul style="list-style-type: none"> <li>• There will be issues with light pollution and overshadowing</li> </ul>	<ul style="list-style-type: none"> <li>• There would be lighting in the scheme, that would be commensurate with what is in the locality and, as such, would not result in a material change that would result in harm to the amenity of nearby residents.</li> </ul>

	<ul style="list-style-type: none"> <li>Given the low height of the buildings ( 2 storeys) and the distance to neighbours there would be no overshadowing of adjacent properties.</li> </ul>
<b>Design</b>	
<b><u>Objection</u></b>	<b><u>Response</u></b>
<ul style="list-style-type: none"> <li>The units are not in coordination with the properties on the estate and would stand out and be an eyesore.</li> <li>Modular Homes of a bright Orange appearance how do they fit into the character and appearance of the Estate.</li> </ul>	<ul style="list-style-type: none"> <li>The Council’s design officer has been consulted and notes that the development provides an exemplary example of modular building design, in a form that is of gentle density and appearance – which is compatible with the varied but mostly residential context. The 2 storey scale of development would be within and below the prevailing height and bulk of the surroundings.</li> <li>The rhythm of windows and doors, panels, and colours, would provide an attractive elevational / fenestration pattern of a comparable scale and proportion to the ordinary domestic surroundings, whilst being clearly of contemporary appearance expressing its progressive modern construction.</li> <li></li> </ul>
<b>Scale/no. of units &amp; the size of the units</b>	
<b><u>Objection</u></b>	<b><u>Response</u></b>
<ul style="list-style-type: none"> <li>There are too many units on a small site.</li> </ul>	<ul style="list-style-type: none"> <li>In line with Publication London Plan Policy D3 Optimising site capacity through the design-led approach – the development makes the best use of land by following a design led approach that optimises the capacity of the site.</li> </ul>

	<ul style="list-style-type: none"> <li>• This is specialist housing that meets the specific needs of the prospective residents.</li> <li>• The maximum number of homes are being delivered so that housing and support can be provided for as many people as possible.</li> <li>• The site layout and design has been carefully considered so that it meets planning requirements as well as the specific needs of prospective residents.</li> </ul>
<ul style="list-style-type: none"> <li>• It would be inhuman to cram up 38 modular houses in a small space, for people, who are already facing traumatic challenges in life.</li> </ul>	<ul style="list-style-type: none"> <li>• The proposed homes would be 24sqm which is smaller than the 37sqm recommended for a 1-bed flat with a shower room in the Technical housing standards produced by the Department for Communities and Local Government. They have been designed as specialist housing for temporary accommodation to support people who have been street homeless at a low cost.</li> <li>• The homes have been designed to be large enough to enable a good quality home for people that have experienced homelessness, while ensuring residents can manage the home and are not vulnerable to exploitation through 'cuckooing' (a practice where people take over a person's home and use the property to facilitate exploitation).</li> </ul>