

## **Appendix 1 Consultation Responses - internal and external consultees and Neighbour Representations**

<b>Stakeholder</b>	<b>Question/Comment</b>	<b>Response</b>
<b>INTERNAL</b>		
<b>Design</b>	<p>Thank you for asking for my comments on this application. I have been involved in extensive pre-application discussions on these proposals, in addition to two Haringey Quality Review Panel (QRP) reviews, and am confident it is an excellent design of the highest quality, eminently suitable for the sensitive location and proposed use.</p> <p>Specifically, the proposals would replace an ad-hoc series of modified and outdated purpose built buildings that make little contribution or act as detractors from the Conservation Area, with contemporary specialist care accommodation designed to accommodate sensitive users to the highest modern standards, in a building of architecture that adapts to the different contexts of the different sides of the development. The North Hill frontage takes the form of a contemporary reinterpretation of the prevailing Georgian architecture, particularly as found in the Statutory Listed adjacent terrace immediately to the north of the site, whilst the View Road frontage takes the form of a contemporary reinterpretation of the Arts &amp; Crafts architecture of many of the original grand detached houses in that street, including the immediate neighbour to the west.</p> <p><b><u>Massing and Roofscape</u></b></p> <p>All the specific concerns raised by officers and the QRP have been satisfactorily addressed. The roof line and roof profile has been improved by reducing the ridge level of the two side wings facing View Road, with the proportion hipped made more comfortable, a gabled bay introduced on the garden side, and roof top plant has been relocated from the flat roofed area between the north Hill block and the main block to a secluded area within the pitched roofed volume, making it virtually invisible and any sound well dampened from any neighbours. Overall, the pitched roof form will appear from View Road and surrounding properties to be in a comfortable proportion in relation to the building. The panel welcomed the footprint and North Hill massing and officers agree that the proposed footprint, massing and roofscape are all appropriate.</p> <p><b><u>Landscape Design</u></b></p>	Comments noted

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	<p>As the QRP notes, the proposal involves some modest reduction on overall area devoted to landscaping compared to the lavishly landscaped existing former care home, but following modifications is pulled well away from boundaries to neighbours' gardens and is in any case well screened by trees on all those boundaries. The concepts and details proposed for landscape design have been welcomed by the panel and officers, and will be further controlled in conditions.</p> <p><b><u>Scheme layout and quality of accommodation</u></b>  A major change since the last QRP was to, as requested by the panel, relocate the restaurant to the ground floor facing the main garden area, with various medical treatment suites moved to the lower ground. Communal spaces and terraces to the upper floors have also been refined so that the main garden elevation will be animated by those main social, communal rooms and terraces. Circulation and layout of the treatment suites in the North Hill block have also been refined, including improving natural light to circulation, with servicing and refuse storage better defined and disguised. Overall the panel and officers agree that the quality and layout of proposed accommodation is now excellent.</p> <p><b><u>Architectural Expression</u></b>  Since the last QRP there have been further refinements to the architectural expression, materials and architectural detailing, in consultation with officers, local ward members and Historic England, to all their satisfaction. This has included simplification of the northern elevation, replacing the proposed green wall with fenestration to circulation and brick recesses, and enriching detailing to both entrances, window surrounds, gables to View Road and walls to landscaping, especially in front of lightwells. All the above agreed that these changes were preferable and more successful to excessive use of use of different coloured bricks, resulting in a calm, well proportioned and well detailed proposal that responds well to different contexts.</p> <p>Other ideas discussed by the QRP included memory of Mary Fielding in the architecture, and the applicants have stated this will be done through artwork. The panel also suggested retention of the existing 1960s "brutalist" North Hill block on grounds of embodied carbon, but officers have always been supportive of its replacement, on grounds of its rather ugly architecture currently being a detractor from the conservation area, in the immediate context of a listed Georgian terrace, to which the proposed North Hill block, a contemporary reinterpretation of Georgian architecture. Overall, the applicants have produced detail on their low carbon design and environmental sustainability to the satisfaction of specialist officers.</p> <p><b><u>Conclusions</u></b>  The proposals would replace existing buildings of varied quality in consistent high quality designs in contemporary reinterpretations of the local context Georgian and Arts &amp; Crafts architecture, of a compatible and appropriate scale to the context, elegantly proportioned, in attractive, appropriate materials and detailing, set in lush, high quality landscaping. Screening vegetation and distances will</p>	

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	<p>protect neighbours privacy, daylight and sunlight, and the quality of accommodation provided by the proposal will be spacious, comfortable, well laid out, well day lit and well connected to its landscaped setting.</p>	
<p><b>Conservation</b></p>	<p>This generous development site sits within Highgate Conservation Area and spans across North Hill and View Road, two throughfares with a different yet complementary historic townscape and character.</p> <p>On North Hill the existing care home building is flanked by a listed terrace, whereas it is adjoined on View Road by a locally listed house.</p> <p>The townscape along North Hill is characterised by the varied and down-sloping topography of The Bank, by the spacious road section, three to four storey buildings of various age well set-back from the pavement behind their front gardens.</p> <p>The main elevation of the existing office building of the Mary Feilding Guild Care Home fronts North Hill and forms part of this townscape.</p> <p>The existing office building on North Hill is linked through a series of utilitarian extension buildings to the original 1920's care home building fronting View Road; despite various side and rear alterations this historic building is deemed to be a positive contributor to the character of the CA.</p> <p>View Road is a quiet residential street where several listed and locally listed large houses comfortably set in large sites are complemented by leafy front gardens and generous, deep rear gardens and contribute to a more suburban character than the busy North Hill.</p> <p>The proposed redevelopment of the Mary Feilding Guild Care Home rests on a thorough assessment of the architectural proportions, quality, heritage significance and conditions of the existing buildings and their site, a careful analysis of the existing topography and gardens forming part of a well-rounded and comprehensive site analysis.</p> <p>Both contextual analysis and the assessment of susceptibility to change and reuse of the original care home have demonstrated the need for and the benefits descending from the replacement and coherent redesign of both existing buildings, poorly proportioned and difficultly accessible interiors, dull office building fronting North Hill and scarcely accessible gardens. The loss of the much-altered original 1920s care home which provides a modest contribution to the character of the area along View Road would have a negligible negative impact on the character of the area and would lead to a low level of less than substantial harm that would be outweighed by the improved care home services and design quality that the proposed scheme provides.</p>	<p>Comments noted</p>

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	<p>This contextual awareness and a solid experience in the design of specialist care homes have been the basis for a sound and successful design exploration aimed at maximising the site potential and providing an optimal level of accommodation with related amenities and a sensitive response to the historic townscape and urban context of the Conservation Area. The extensive pre-application discussion with council officers, review and local groups has informed a very specific design proposal that extends across the site replacing and optimising the footprint, plan form, amasses and heights of the existing building, with a carefully proportioned new care home building that would benefit from a fully reconfigured and accessible soft and hard landscaped garden space that will pleasantly complement the architectural design of the new buildings. The whole project has been sensitively shaped, both externally and internally by the need to complement the historic townscape of the conservation area respectively on its North Hill and View Road frontages while expressing the genuinely contemporary character of the new care home.</p> <p>The proposed office building along North Hill retains the proportions of the existing one, which is bland and monolithic and offers a straightforward opportunity for improvement. The proposed design seizes this opportunity to enhance forms, functions, and setting of the listed terrace and introduces an interesting articulation of heights and masses and a facade design inspired by the adjacent Georgian terrace and softened by the elegantly multifaceted brickwork façade. The proposal has been carefully shaped and assessed in views across the conservation area along North Hill and by virtue of its sensitive design approach, it fully respects the architectural primacy and legibility of the listed terrace in its urban context and is supported from conservation grounds.</p> <p>The care home building fronting View Road respects the height of neighbouring houses and has been designed as contemporary reinterpretation of a suburban villa with symmetric façade, generous fenestration and an interesting roof articulation that draws inspiration from the traditional roofs, dormers, and prominent gables of the adjacent buildings. The subtly elaborated brick façade would be complemented by the soft landscaped garden hidden behind the retained boundary wall located on a raised street level along View Road where the proposed building will positively complement its varied context while retaining a number of established features of this part of the conservation area such as the enclosed nature of the View Road building, the suburban, residential, verdant character of View Road as well as featuring the established architectural forms and materials reinterpreted in a more contemporary key. The building fronting View Road is supported from the conservation perspective with encouragement to further refine the façade treatment, dormers, and porch.</p> <p>The proposed development has been rooted in deep understanding of the site potential and full awareness of the value of its heritage setting. It is a design proposal that creatively seizes the opportunities offered by this challenging and multifaceted heritage site through a conservation-led, context-responsive, well-articulated design concept that provides a specialist development response to</p>	

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	<p>this part of the conservation area, a well- founded design response that can be certainly refined and honed at detailed design stage.</p> <p>The submitted scheme will lead to a very low, less than substantial harm to the significance of the Conservation area and its assets while optimising the use of the site and its garden and while enhancing the townscape along North Hill and is therefore fully supported.</p>	
<b>Transportation</b>	<p><u>Application Proposal</u></p> <p>This application seeks to demolish the existing Mary Feilding Guild Care Home which closed during 2021, and construct a new 70 bedroom care home with wellbeing and physiotherapy centre. Basement parking with 17 spaces is also proposed, created by extending the existing basement at the site.</p> <p>The existing home accommodated 43 rooms and was closed as considered unviable by the current owners.</p> <p>The new home will operate over 4 floors plus the basement, with reception on the ground floor, elderly care bedrooms on the first floor, dementia care on the second floor and the wellbeing centre on the third floor. Of the 70 rooms proposed, 43 will be for long stay patients and 27 short stay for post operative recuperation.</p> <p>The well being centre will include a hydrotherapy pool, steam room, sauna, gym, treatment/medical rooms, hairdressing and beauty salon. There will be a mix of inpatient and outpatient/public use for these facilities.</p> <p><u>Location and access</u></p> <p>The site is located to the western side of North Hill, at the junction of North Hill with View Road (to the northern side of the junction). The site has frontages to both North Hill and View Road.</p> <p>The site has a PTAL value of 3, considered 'moderate' access to public transport services. 5 different bus services are accessible within 2 to 8 minutes walk of the site, and Highgate Underground Station is a 9 minute walk away.</p> <p>It is also located within the Highgate Outer CPZ, which has operating hours of 10.00 to 12.00 Monday to Friday.</p> <p>At present there are two vehicle crossovers/accesses off view Road and one off North Hill. There are 3 parking spaces at the North Hill entrance and additional car parking is available within the site accessed from the crossovers off View Road.</p>	<p>Observations have been taken into account. The Recommended legal agreement clauses and conditions will be included with any grant of planning permission as appropriate</p>

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	<p>It is intended to retain the two crossovers off View Road to facilitate access to a drop off facility and also the basement parking. These appear to be retained as existing, there is no reference in the application to any physical changes to these highway accesses.</p> <p>The existing access on North Hill is no longer required, so the applicant will need to enter into the appropriate Highways Act Agreement to meet the physical and administrative costs of reinstating the crossover to full height kerb and footway. This can be covered by the S106 for the development.</p> <p>Pedestrian access will be primarily from the View Road side of the care home however it will also be possible from North Hill side of the site.</p> <p><u>Transportation Assessment</u></p> <p>A Transportation Assessment accompanied the application, a number of queries arising from this have been examined and discussed with the applicant, and a subsequent Transport Statement Addendum has been drafted and submitted by the applicant during March 2022 to update the proposals to reflect these discussions. Overall there will be an uplift in transportation demands and activity at the site given the expansion in room numbers and other services that will be available as proposed.</p> <p><u>Trip generation.</u></p> <p>The existing facility was a 43 bed care home, and with this larger proposal, and associated other facilities (wellbeing and physiotherapy centre), an uplift in trips to and from the site will occur.</p> <p>It is detailed that there will be 82 members of staff overall, with a maximum 38 employees at the care home during the 0900 – 1400 period, and up to 67 daily attendees for outpatient physiotherapy sessions at the wellbeing facility (operating 0700 – 1900). The Gym will be able to accommodate up to 13 users at any time.</p> <p>The application TA originally detailed the following with respect to predicted trips;</p> <ul style="list-style-type: none"> <li>• 218 two way trips daily, by all modes, 15 in the AM peak and 13 in the PM Peak hours.</li> <li>• 26 two way trips are predicted for the busiest hourly period during the day (1400 – 1500)</li> <li>• Staff car mode share predicted to be 15% based on census journey to work records (9%) and TRICS survey information (10%), however this has been increased for robustness</li> <li>• A 10% turnover of patients is expected by day (7 arrivals/departures) with patient transport by ambulance</li> <li>• Visiting hours are to be 0900 – 1400 and 1800 – 1900, with 30% of patients having visitors per day. The TA assumes all patient visitors will drive to the care home.</li> </ul>	

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	<ul style="list-style-type: none"> <li><i>The well being centre mode share is predicted to be 25% by car, based on a mix of gym users (expected to not use cars on the whole) and a proportion of rehab visitors using cars due to their medical difficulties.</i></li> </ul> <p>Following review of the trip generation predictions, Transportation have queried a number of aspects of it, which have been discussed with the applicant, and revised trip generation assumptions have now been provided within the transport addendum. These are as follows;</p> <ul style="list-style-type: none"> <li>Transportation consider that the 15% mode share proposed for staff is an underestimate, particularly with respect to staff that work shifts and travel in from outside of the Borough. The applicant has subsequently revisited this within the addendum taking into account journey to work census data from adjoining Boroughs and revised the mode share upwards to 41% for car journeys to work.</li> <li>Evidence relating to visitor trips was requested to underpin the trip generation assumptions.</li> <li>The gym was originally expected to be open for wider public use, however the applicant has now revised their proposals to no longer include 'walk in' use by the general public.</li> </ul> <p><u>Car parking arrangements</u> At present, the site has 5 off street parking spaces accessed off North Hill.</p> <p>Basement car parking (17 spaces) is proposed at the site. 2 blue badge spaces are included along with two larger bays able to be converted to blue badge if required. An ambulance drop off bay is proposed at ground level accessed via the two crossovers off View Road. This bay can also be used for informal drop off and pick ups. 2 electric vehicle charging spaces are shown, there are no specific requirements in the London Plan or charging point provision for care homes.</p> <p>The ramp appears to start within the site several metres from the View Road crossover, and it is not expected that the proposed arrangement will create any highway or safety issues. The ramp appears to be able to accommodate two way vehicle movements and it is expected cyclists will access the basement long stay cycle parking via the ramp or alternatively use one of the lifts. There is Institution of Structural Engineers Guidance for the design and detailing of ramps and underground car parks and the applicant will need to adhere to this.</p> <p><u>Car trips predicted to and from the site</u></p>	

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	<p>Based on the revised 41% mode share for employees, the peak arrival numbers by staff driving is 13 vehicles during the period 0730 to 0800, and 12 vehicles during the period 1330 to 1430. The applicant considers these demands can be met by the parking available within the site.</p> <p>With respect to car trips made by visitors, the TA proposed similar to other surveyed sites, a rate of 30% visitors per day which would result in 22 car arrivals during visiting hours. The accumulation shows the peak numbers of cars attending in any hour to be 7 during the period between 12.00 and 14.00</p> <p>In addition to the above, there will also be car trips made by physiotherapy outpatients, during the period 0800 – 1830, and with 10 practitioners able to see 10 patients per hours/appointment, there will be additional car trips requiring parking during these periods.</p> <p>Taking the above components of car trips to and from the site into account, a revised vehicular trip generation has been derived within the transport addendum and this now predicts a peak car parking demand from the site for 39 vehicles during the 1300 – 1400 period, creating on street parking demands for 22 parking spaces.</p> <p><u>Local parking conditions and parking stress survey</u>  The TA includes a parking stress survey, carried out for different daytime periods to match the AM/PM Peaks and expected shift changeovers. Recorded local parking levels are quite variable with some streets during the daytime appearing to be relatively low, with stresses off 28% to 38% recorded on View Road, 38 spaces available out of 61 on the road at the busiest time. It is also noted that very high stresses are recorded on North Hill Avenue, Church Road and Toyne Way, with stresses recorded upwards of 80% and up to 97% on these roads (based on a 5m car length).</p> <p><u>Car Parking impacts and mitigation required</u>  With the revised trip generation applied and predicted numbers of cars that will attend either as employees, visitors or therapy/physio outpatients, there will be additional parking demands generated on street.</p> <p>There are very high parking stresses recorded on some streets within the stress survey and the predicted impacts arising from this proposal will need to be mitigated and managed. Therefore, it will be appropriate for the following conditions and S106 contribution to be required should this be granted consent;</p> <ul style="list-style-type: none"> <li>• The Gym can only be used by residents of the proposed care home facility or patrons of day the treatment centre.</li> </ul>	



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	<ul style="list-style-type: none"> <li>• The outpatients facility should only be opened to patients between the hours of 08:00 to 18:30 hours, and should have no more than 7 treatment rooms and no more than 67 appointments per day.</li> <li>• The applicant will be required to contribute £20,000 towards parking management measures in the local area to deal with any potential overspill or parking outside the CPZ operational hours on Storey Road, North Hill, Church Road, Talbot Road and other roads within the local area.</li> </ul> <p><u>Cycle parking</u>  London Plan standards for care homes require 1 long stay space per 5 FTE staff and 1 visitor space per 20 bedrooms. The proposed provision numerically meets that. 8 long stay spaces are proposed for location in the basement, accessed via the ramp or alternatively from one of the available lifts to the basement.</p> <p>There is also the gym to be provided with this development, which will be able to be used by external individuals who book (no 'walk ups'). The London Plan requires 1 space per 8 staff, the staff numbers for the centre include gym staff so the long stay cycle parking for them is included. Short stay for the gym requires two spaces.</p> <p>Short stay spaces are to be provided at ground floor level and these appear to be located adjacent to the bin stores. 5 are referred to in the TA, however the waste arrangements drawing indicates ten spaces, it would seem that 4 are required for the care home and two for the gym, this does need to be clarified.</p> <p>The usage of cycle parking will be monitored under the travel plan and if demand requires Additional cycle parking will be able to be provided within the site.</p> <p>Full details of the proposed cycle parking arrangements will be required for review and approval prior to commencement of the development construction works and this can be covered by a pre commencement condition. Dimensioned drawings showing centres, spacing, manoeuvring space and the like are required along with details of the system intended for use. All cycle parking will need to be designed to meet the requirements of the London Cycles Design Standards as produced by TfL.</p> <p><u>Deliveries and servicing</u>  4 delivery and servicing trips are predicted per day. A delivery bay is included within the basement for visiting service vehicles, and the ground level drop off bay can also be used. Servicing activity takes place from both North Hill and View Road at present, however with this proposal is it intended to take place from View Road Only, accommodated off of the highway.</p>	

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	<p><u>Refuse and recycling storage and collections</u> A private contractor will be used to make refuse and recycling collections, using a smaller vehicle than those used by the Council, and collections will be made from within the site utilising the internal drop off bay accessed off View Road.</p> <p><u>Travel plan</u> A full Travel Plan is appropriate for this development proposal, to ensure that the development proposal encourages travel by sustainable modes of transport to and from the development and is in line with the Councils Local Plan Policies SP1, SP4 and SP7. Provision of a Travel Plan is referenced within the TA, including a mechanism to monitor cycle parking and provide more if demands require. This can be covered by the S106 and a Travel Plan monitoring fee will be required.</p> <p><u>Construction phase</u> A comprehensive Construction Logistics Plan will be required for this development, and a condition requiring a detailed draft for submission and approval 3 months prior to proposed commencement of the works will be required.</p> <p>The applicant will need to detail how impacts on the public highway and adjacent neighbours will be minimised and managed, and it is strongly recommended the applicant engages with Haringey's Network Management officers to discuss and agree any temporary measures, routing to and from the site, and especially with regards to Highgate Primary school which is close by to the site.</p> <p><u>Conclusion</u> This application is for redevelopment of the Mary Feilding Guild Care Home site in Highgate, to provide a larger care home with accompanying wellbeing centre. A basement car park with 17 spaces is also included in the proposal.</p> <p>From the transportation perspective, this will increase trips compared to the previous establishment, but not to any extent that will be problematical for the capacity or functioning of local highway and public transport networks. The onsite car parking should meet almost all of the potential demands from employees, however external parking demands will be generated by the combination of visitors and those attending the therapy and wellbeing services. These external demands will raise parking stresses in the locality of the site and will require mitigation as referenced earlier in this response, including restrictions on aspects of the services running at the site, and a financial contribution to investigate, design and implement parking management measures to manage these impacts.</p> <p>Long stay cycle parking is provided to meet London Plan standards, there is some ambiguity about the short stay provision however and this needs to be clarified. The details can be covered by a pre</p>	

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	<p>commencement cycle parking condition. All delivery and servicing, and refuse/recycling collections appear to be able to be accommodated off of the highway as well which is welcomed.</p> <p>Transportation has no objection to this application subject to the following;</p> <p><u>Conditions</u></p> <ol style="list-style-type: none"> <li>1. Cycle parking must be provided in line with the London Plan and the design and implementation must be in line with the London Cycle Design Standards as produced by TfL.</li> </ol> <p>Reason – to ensure high quality long and short stay cycle parking for employees and visitors and contribute towards the uptake of active travel modes</p> <ol style="list-style-type: none"> <li>2. A Construction Logistics Plan will be required, to be submitted three months before commencement of the works on site. The Construction Logistics Plan shall include: <ul style="list-style-type: none"> <li>• a survey of the existing conditions of adjacent public highways;</li> <li>• an assessment of the cumulative impacts of demolition and construction traffic;</li> <li>• details of the likely volume of demolition and construction trips and any mitigation measures;</li> <li>• site access and exit arrangements including wheel washing facilities and swept paths where required;</li> <li>• vehicular routes, booking systems and an assessment for the scope of consolidating loads to reduce generated road trips;</li> <li>• proposed temporary access and parking suspensions and any temporary access and parking solutions required;</li> <li>• Site compound arrangements including arrival of vehicles, parking, loading, storage and waste arrangements;</li> <li>• methods for of protection of adjacent highway infrastructure; and,</li> <li>• an assessment of all matters as are likely to cause nuisance to adjoining occupiers (including but not limited to; noise, dust, smoke, road cleaning, odour control) accompanied by mitigation measures addressing all matters relevant to this particular site.</li> </ul> <p>Works shall only be carried out in accordance with the approved Construction Logistics Plan. Reason: To safeguard the amenities of the area, the local highway and manage the impacts of the development.</p> </li> <li>3. The Gym can only be used by residents of the proposed care home facility or patrons of day the treatment centre. Reason- To reduce the number of trips generated by the development and the resulting car parking demand on local roads.</li> </ol>	

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	<p>4. The outpatients facility should only be opened to patients between the hour of 08:00 to 18:30 hours, and should have no more than 7 treatment rooms and no more than 67 appointments per day. Reason - To reduce the number of trips generated by the development and the resulting car parking demand on local roads.</p> <p><u>S106 Obligations</u></p> <ol style="list-style-type: none"> <li>1. The applicant will be required to submit a travel plan no less than 3 months before the development is occupied and will be required to pay a travel plan contribution of £2k per year for a period of 5 years.</li> <li>2. The applicant will be required to enter into a Section 278 Agreement with the Highway Authority Reinstatement of redundant crossover in North Hill at the former access, and meet all of the Council's costs.</li> <li>3. The applicant will be required to contribute £20,000 towards parking management measures in the local area to deal with any potential overspill or parking outside the CPZ operational hours on Storey Road, North Hill, Church Road, Talbot Road and other roads within the local area.</li> <li>4. The development will need to be formally designated as 'permit free' with respect to the issue of Business Permits for the CPZ, with the applicant meeting the Council's costs of £4,000 to administer.</li> </ol>	
<b>Lead Pollution</b>	<p>Having considered all the relevant supportive information on pollution especially the Air Quality Assessment Report with reference J10/13064/10/1/F2 prepared by Air Quality Consultants Ltd dated 26<sup>th</sup> November 2021 taken note of sections 4 (Assessment Approach), 5 (Baseline Conditions), 8 (Air Quality Neutral), 9 (Mitigation) and 10 (Conclusions), Energy Statement Report dated November 2021 with the proposed use of Air Source Heat Pumps and Gas Boilers as the main source of energy as well as considering the nature of the proposed development end use, landscapes and garden plan, <b>please be advise that we have no objection to the proposed development in respect to air quality and land contamination but the following planning conditions and informative are recommend should planning permission be granted.</b></p> <p><b>1. <u>Land Contamination</u></b> Before development commences other than for investigative work:</p>	<p>Comments noted. Conditions/informative included</p>

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	<p>a. A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information.</p> <p>b. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority.</p> <p>c. If the desktop study and Conceptual Model indicate any risk of harm, 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.</p> <p>d. 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.</p> <p>e. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.</p> <p><b><u>Reason:</u></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></p> <p>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.</p> <p><b><u>Reasons:</u></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>	

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	<p><b>3. <u>NRMM</u></b></p> <p><b>a.</b> No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <a href="http://nrmm.london/">http://nrmm.london/</a>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.</p> <p><b>b.</b> An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p><b>Reason:</b> To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ</p> <p><b>4. <u>Demolition/Construction Environmental Management Plans</u></b></p> <p><b>a.</b> Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst</p> <p><b>b.</b> Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.</p> <p>The following applies to both Parts a and b above:</p> <p>a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).</p> <p>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;</p> <p>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;</p> <p>iii. Details of plant and machinery to be used during demolition/construction works;</p> <p>iv. Details of an Unexploded Ordnance Survey;</p> <p>v. Details of the waste management strategy;</p> <p>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>;</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> <p><b>The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.</b></p> <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>5. Combustion and Energy Plant</b></p>	

Stakeholder	Question/Comment	Response
	<p>Prior to installation, details of the gas boilers to be provided for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh (0%).</p> <p><b>Reason:</b> As required by The London Plan Policy 7.14.</p> <p><b>6. Combined Heat and Power (CHP) Facility</b></p> <p>Prior to the commencement of the development, details of the Combined Heat and Power (CHP) facility of the energy centre or centralised energy facility or other centralised combustion process and associated infrastructure shall be submitted in writing to and for approval by the Local Planning Authority.</p> <p>The details shall include:</p> <ul style="list-style-type: none"> <li>a) location of the energy centre;</li> <li>b) specification of equipment;</li> <li>c) flue arrangement;</li> <li>d) operation/management strategy; and</li> <li>e) the method of how the facility and infrastructure shall be designed to allow for the future connection to any neighbouring heating network (including the proposed connectivity location, punch points through structure and route of the link)</li> <li>f) details of CHP engine efficiency</li> </ul> <p>The Combined Heat and Power facility and infrastructure shall be constructed in accordance with the details approved, installed and operational prior to the first occupation of the development and shall be maintained as such thereafter.</p> <p><b>Reason:</b> To ensure the facility and associated infrastructure are provided and so that it is designed in a manner which allows for the future connection to a district system.</p> <p><b>Informative:</b></p> <ol style="list-style-type: none"> <li>1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</li> </ol>	



Stakeholder	Question/Comment	Response									
	I hope the above clarify our position on the application? Otherwise, feel free to revert back to us should you have any further query in respect of the application quoting M3 reference number WK/521800.										
Carbon Team	<p><b>Carbon Management Response 10/02/2022</b></p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> <li>• Energy Statement prepared by Hodkinson (dated November 2021)</li> <li>• Dynamic Overheating Report prepared by Hodkinson (dated November 2021)</li> <li>• Sustainability Statement prepared by Hodkinson (dated November 2021)</li> <li>• Circular Economy Statement prepared by Hodkinson (dated November 2021)</li> <li>• Whole Life Carbon Assessment prepared by Hodkinson (dated November 2021)</li> <li>• Relevant supporting documents.</li> </ul> <p><b>1. Summary</b></p> <p>The development achieves a reduction of <b>62%</b> carbon dioxide emissions on site, which is supported in principle after clarifications are provided. Clarifications must also be provided in regard to the Overheating Strategy and there are concerns over the resiliency of this development in more extreme weather events,</p> <p>Appropriate planning conditions will be recommended once this information has been provided.</p> <p><b>2. Energy – Overall</b></p> <p>Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013)). The London Plan (2021) further confirms this in Policy SI2.</p> <p>The overall predicted reduction in CO<sub>2</sub> emissions for the development shows an improvement of approximately 62.2% in carbon emissions with SAP10 carbon factors, from the Baseline development model (which is Part L 2013 compliant). This represents an annual saving of approximately 233.5 tonnes of CO<sub>2</sub> from a baseline of 375.5 tCO<sub>2</sub>/year.</p> <p>London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are: 69 tCO<sub>2</sub>.</p> <table border="1"> <thead> <tr> <th>(SAP10 emission factors)</th><th>tCO<sub>2</sub></th><th>%</th></tr> </thead> <tbody> <tr> <td><b>Baseline emissions</b></td><td>375.5</td><td></td></tr> <tr> <td><b>Be Lean savings</b></td><td>110.2</td><td>29.3%</td></tr> </tbody> </table>	(SAP10 emission factors)	tCO <sub>2</sub>	%	<b>Baseline emissions</b>	375.5		<b>Be Lean savings</b>	110.2	29.3%	Comments noted. Conditions and legal agreement Clauses included
(SAP10 emission factors)	tCO <sub>2</sub>	%									
<b>Baseline emissions</b>	375.5										
<b>Be Lean savings</b>	110.2	29.3%									

Stakeholder	Question/Comment			Response
	Be Clean savings	121	32.2%	
	Be Green savings	2.3	0.6%	
	Cumulative savings	233.5	62.2%	
	Carbon shortfall to offset (tCO <sub>2</sub> )	142		
	Carbon offset contribution	£95 x 30 years x 142 tCO <sub>2</sub> /year = £404,700 + 10% management fee		
	<b>Energy – Lean</b>			
	The applicant has proposed a saving of 125.2 tCO <sub>2</sub> in carbon emissions (28.5%) through improved energy efficiency standards in key elements of the build (unclear which carbon factors). This potentially goes beyond the minimum 15% reduction respectively set in London Plan Policy SI2.			
	The following u-values, g-values and air tightness are proposed:			
	Floor u-value	0.10 W/m²K (above car park 0.15 W/m²K)		
	External wall u-value	0.18 W/m²K (wall to car park 0.25 W/m²K)		
	Roof u-value	0.15 W/m²K		
	Door u-value	1.80 W/m²K		
	Window u-value	1.30 W/m²K		
	G-value	0.30		
	Air permeability rate	5 m³/hm² @ 50Pa		
	Ventilation strategy	Mechanical ventilation with heat recovery (MVHR >85% efficiency)		
	Low energy lighting	100 lum/Watt		
	Heating system (efficiency / emitter)	Gas boiler (96% efficiency)		
	Cooling strategy	For specialist rooms that require controlled indoor temperatures. Air source heat pump (EER 4.0 and SEER of 6.5) 12 MJ/m² and 69,936 MJ/year area-weighted cooling demand		
	Wastewater	Wastewater heat recovery system (54% efficiency, 8l/min flow rate)		
	<u>Actions:</u>			
	<ul style="list-style-type: none"><li>- Please identify on a plan where the MVHR units will be located within the spaces. The units should be less than 2m away from external walls if possible.</li><li>- How is lighting energy demand improved? Should consider daylight control and occupancy sensors for communal areas.</li></ul>			

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- Provide the average space heating requirement in kWh/m<sup>2</sup>/year.</li> <li>- Specify the individual end use BER for specific end users in line with CIBSE Guide F.</li> <li>- Active cooling is not acceptable unless the dynamic thermal simulation has demonstrated that this is required, after all other mitigation measures have been exhausted. The overheating assessment currently states that active cooling is not required.</li> </ul> <p>Overheating and the demand for cooling is dealt with in more detail below.</p> <p><b>Energy – Clean</b>  The site is not within reasonable distance of a proposed Decentralised Energy Network (DEN). A Combined Heat and Power (CHP) plant would not be appropriate for this site.</p> <p>Instead, the applicant has proposed a low-carbon heat network for this development, based on air source heat pumps (ASHPs):</p> <ul style="list-style-type: none"> <li>- 70% primary source, baseload supply by 204 kW ASHPs (SCOP 3.15)</li> <li>- 30% backup supply of peak energy by 102 kW gas boilers (efficiency 96%)</li> <li>- Operating temperatures of 55/47°C</li> <li>- Thermal stores and other ancillary plants in 102 m<sup>2</sup> plant room.</li> </ul> <p><u>Actions:</u></p> <ul style="list-style-type: none"> <li>- How will the system be managed to prioritise the use of ASHPs over gas boilers?</li> <li>- Please see where the pipes will run. How will heat losses from the pipework be minimised?</li> <li>- How large will the thermal store be?</li> </ul> <p><b>Energy – Green</b>  As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.</p> <p>The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (included under Be Clean) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 2.3 tCO<sub>2</sub> (0.6%) reduction of emissions are proposed under Be Green measures.</p> <p>The solar array peak output would be 14 kWp. The array of panels would be mounted the third-floor roof at a 15° angle, facing south-west/south-east.</p> <p><b>3. Carbon Offset Contribution</b></p>	

Stakeholder	Question/Comment	Response														
	<p>A carbon shortfall of 142 tCO<sub>2</sub>/year remains. The remaining carbon emissions will need to be offset at £95/tCO<sub>2</sub> over 30 years: £404,700 + 10% management fee.</p> <p><b>4. Overheating</b></p> <p>London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.</p> <p>In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment, and the cooling hierarchy has been followed in the design. The report has modelled:</p> <ul style="list-style-type: none"><li>- 11 bedrooms under CIBSE TM59</li><li>- 3 communal areas (ground floor central hub, 2<sup>nd</sup> floor dining room, 2<sup>nd</sup> floor lounge) under CIBSE TM52</li><li>- Using the TM49 London Heathrow files, high emissions, 50% percentile scenario</li><li>- Assessed against Category I criteria of the adaptive method (vulnerable occupants).</li></ul> <p>Results are listed in the table below.</p> <table><tr><th></th><th>Number of habitable rooms pass TM59 (bedrooms)</th><th>Number of spaces pass TM52 (communal areas)</th><th>Number of corridors pass</th></tr><tr><td>DSY1 2020s</td><td>11/11</td><td>3/3</td><td rowspan="3">Not modelled</td></tr><tr><td>DSY2 2020s</td><td>1/11</td><td>0/3</td></tr><tr><td>DSY3 2020s</td><td>0/11</td><td>0/3</td></tr></table> <p>All rooms pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:</p> <ul style="list-style-type: none"><li>- Natural ventilation</li><li>- MVHR – stated in Energy Strategy</li><li>- Glazing g-value of 0.30</li><li>- External shading: balconies and some pergola structures (on internal courtyard only)</li><li>- No active cooling</li></ul> <p>Proposed future mitigation measures include:</p> <ul style="list-style-type: none"><li>- Replacement windows with higher thermal performance (such as triple glazing and/or panes with a lower g-value);</li><li>- Installing solar reflective internal blinds</li></ul>		Number of habitable rooms pass TM59 (bedrooms)	Number of spaces pass TM52 (communal areas)	Number of corridors pass	DSY1 2020s	11/11	3/3	Not modelled	DSY2 2020s	1/11	0/3	DSY3 2020s	0/11	0/3	
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Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- Allow for installation of active cooling in ceiling voids</li> <li>- Planting additional trees and green areas</li> </ul> <p><u>Overheating Actions:</u></p> <p>Modelling inputs</p> <ul style="list-style-type: none"> <li>- The overheating report does not mention anything about mechanical ventilation with heat recovery, has this been included? Does it have a summer bypass?</li> <li>- What are the openable areas of the windows?</li> <li>- What heat losses have been assumed from the communal heating pipework?</li> <li>- What secure by design measures have been included in the design to prevent the risk of crime to ground floor dwellings? Will these windows be openable at night?</li> </ul> <p>Additional modelling</p> <ul style="list-style-type: none"> <li>- Please model the top floor corridor.</li> <li>- The applicant should also model the ground floor café (south and westerly aspects).</li> <li>- The DSY1 2050s weather file has not been modelled and this should help inform what mitigation measures may be appropriate to implement now, and in the future (see the point below about resiliency in more extreme weather events).</li> </ul> <p>Modelling results/mitigation measures</p> <ul style="list-style-type: none"> <li>- The Energy Strategy notes that cooling is required for specialised rooms without specifying what that means and which rooms this would concern. This has not been cross-referenced in this report. The overheating assessment should first model the baseline without active cooling, and after all mitigation measures following the Cooling Hierarchy have been exhausted, can active cooling be proposed.</li> <li>- Although the spaces pass the minimum requirement with 2020s DSY1 weather file, future modelling shows a lack of resiliency against more extreme and different types of heatwaves. The applicant is strongly advised to improve the resiliency of this development as it concerns vulnerable residents.</li> <li>- In addition, the future mitigation measures are helpful, but can the applicant please demonstrate how this will improve the overheating results in the future?</li> <li>- Please demonstrate that sufficient space been left within the ceiling voids to install any necessary additional ventilation/cooling equipment.</li> <li>- Identify communal spaces (indoor and outdoor) where residents can cool down if their flats are overheating.</li> <li>- Confirm who will own the overheating risk when the building is occupied (not the residents).</li> </ul>	

Stakeholder	Question/Comment	Response
	<p><b>5. Sustainability</b></p> <p>Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The Sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design.</p> <p><u>Action:</u></p> <ul style="list-style-type: none"> <li>- Will bicycle users have the opportunity to safely park and charge e-bikes if they have one? Some users may prefer e-bikes due to the hilly nature of Highgate.</li> <li>- It is noted that more car parking will be provided than cycle parking, please include justification for this difference in approach.</li> <li>- Climate change mitigation should also be considered for the external spaces (shading, etc) and the impact of the increase in severity and frequency of weather events on the building structures.</li> </ul> <p><b><i>Non-Domestic BREEAM Requirement</i></b></p> <p>Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.</p> <p>The applicant has also prepared a BREEAM Pre-Assessment Report for the care home. Based on this report, a score of 66.94% is expected to be achieved, equivalent to 'Very Good' rating.</p> <p><b><i>Living roofs</i></b></p> <p>All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. The development is proposing living roofs in the development.</p> <p>All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth.</p> <p>Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition.</p> <p><b><i>Biodiversity</i></b></p>	

Stakeholder	Question/Comment	Response									
	<p>The development achieves an Urban Greening Factor of 0.42, which complies with the interim minimum target of 0.4 for predominantly residential developments in London Plan Policy G5.</p> <p><b>Whole Life Carbon</b> Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions. This application is not required to submit a full statement, however a report was submitted nevertheless.</p> <p>The total calculated emissions based on the GIA (without grid decarbonisation) is estimated at:</p> <table border="1"> <thead> <tr> <th></th><th>Estimated carbon emissions</th><th>Meets benchmark?</th></tr> </thead> <tbody> <tr> <td>Modules A1-A5</td><td>445 kgCO<sub>2</sub>e/m<sup>2</sup></td><td>Meets GLA target (800 kgCO<sub>2</sub>e/m<sup>2</sup>) and aspirational benchmark (450-500 kgCO<sub>2</sub>e/m<sup>2</sup>) Meets LETI aspirational target (500 kgCO<sub>2</sub>e/m<sup>2</sup>)</td></tr> <tr> <td>Modules B-C (excl. B6 and B7)</td><td>331 kgCO<sub>2</sub>e/m<sup>2</sup></td><td>Meets GLA target (400 kgCO<sub>2</sub>e/m<sup>2</sup>) Misses LETI aspirational target (240 kgCO<sub>2</sub>e/m<sup>2</sup>)</td></tr> </tbody> </table> <p>Potential savings could amount to savings of 172 or 181 kgCO<sub>2</sub>/m<sup>2</sup>GIA (two figures cited):</p> <ul style="list-style-type: none"> <li>- Reduced material use: concrete as finish, future dismantling, durable materials, maintenance and repair schedule</li> <li>- Recycled materials: innovative cement mixed, end-of-life concrete recycling, steel with high recycled content</li> <li>- Re-use of materials</li> <li>- Sustainable procurement</li> </ul> <p><b>Circular Economy</b> Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.</p> <p>This application is not required to submit a full statement. The principles used for this development are:</p> <ul style="list-style-type: none"> <li>- Material efficiency and lean design principles</li> <li>- Design adaptability and flexibility</li> <li>- Structural and fabric robustness and resilience</li> <li>- Material circularity, material procurement via leasing frameworks and enabling ease for</li> </ul>		Estimated carbon emissions	Meets benchmark?	Modules A1-A5	445 kgCO <sub>2</sub> e/m <sup>2</sup>	Meets GLA target (800 kgCO <sub>2</sub> e/m <sup>2</sup> ) and aspirational benchmark (450-500 kgCO <sub>2</sub> e/m <sup>2</sup> ) Meets LETI aspirational target (500 kgCO <sub>2</sub> e/m <sup>2</sup> )	Modules B-C (excl. B6 and B7)	331 kgCO <sub>2</sub> e/m <sup>2</sup>	Meets GLA target (400 kgCO <sub>2</sub> e/m <sup>2</sup> ) Misses LETI aspirational target (240 kgCO <sub>2</sub> e/m <sup>2</sup> )	
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Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- disassembly and maintenance</li> <li>- Whole Life Cycle Carbon Assessments</li> <li>- Tenant and community engagement</li> </ul> <p>The report sets out the Key Commitments and the draft Bill of materials (Table 4-2).</p> <p><b>Planning Conditions</b> To be secured (with detailed wording TBC):</p> <ul style="list-style-type: none"> <li>- Energy strategy</li> <li>- Overheating</li> <li>- BREEAM Certificate</li> <li>- Living roofs</li> <li>- Biodiversity</li> </ul> <p><b>Planning Obligations Heads of Terms</b></p> <ul style="list-style-type: none"> <li>- Be Seen commitment to uploading energy data</li> <li>- Energy Plan and Sustainability Review</li> <li>- Estimated carbon offset contribution (and associated obligations) of £404,700 (indicative), plus a 10% management fee (based on £2,850 per tonne of carbon emissions)</li> </ul> <p><b>Carbon Management Response 15/03/2022</b></p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> <li>• Comments on the CM response issued 10<sup>th</sup> February (dated 18 February 2022)</li> <li>• Relevant supporting documents.</li> </ul> <p><b>Energy Strategy</b></p> <p><b>Be Lean</b> The applicant has clarified the following:</p> <ul style="list-style-type: none"> <li>- MVHR to serve office areas consult, gym, studios, barbers, hair and beauty, reception, shop, admin, café, manager, restaurant, servery, treatment/medical room, lounge, staff room and juice bar</li> <li>- Space heating demand at 8.87 kWh/m<sup>2</sup>/year seems low, how has this been calculated?</li> <li>- Cooling is only proposed for a few specialist rooms (not defined where), and not for bedrooms, transitory spaces or generally unoccupied spaces.</li> </ul>	



Stakeholder	Question/Comment	Response
	<p><b>Be Clean</b> The applicant has clarified the following:</p> <ul style="list-style-type: none"> <li>- The ASHP will provide 100% of space heating requirement and 70% of the hot water provision. Gas boilers will supply the remaining demand at peak times (weekday mornings and evenings).</li> </ul> <p><b>Overheating</b> The applicant has clarified the following:</p> <ul style="list-style-type: none"> <li>- MVHR and MEV has been included in the model.</li> <li>- Windows are assumed to be fully openable to a minimum 60 degrees. Secure by Design principles have been followed according to the applicant. Ground floor openable windows will be restricted to 100mm to ensure resident safety.</li> <li>- Heat loss calculations have not yet been undertaken. This will be conditioned.</li> <li>- Sufficient space is included in the ceiling voids for necessary ventilation/cooling equipment. It assumes an internal floor-to-ceiling height of 2.6m (basement and ground floor) or 2.4m (upper floors) with voids of c. 688mm and 588mm respectively. However, the London Design Guide advocates for minimum internal floor-to-ceiling heights of 2.5m, so the space would not be sufficient on upper floors.</li> </ul> <p>The applicant states that modelling of the top floor corridor is not required, which goes against requirements in the GLA Energy Assessment Guidance and CIBSE TM59. Only one of the corridors is required for testing, this will be conditioned.</p> <p>The applicant has not modelled DSY1 2050s weather file, which was requested at pre-application stage. The proposed mitigation measures for the future have also not been modelled. This will be conditioned.</p> <p><b>Conditions</b> <u>Energy Strategy</u> <i>The development hereby approved shall be constructed in accordance with the Energy Statement prepared by Hodkinson (dated November 2021) delivering a minimum 62% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, air source heat pumps (ASHPs) for 100% space heating and minimum 70% hot water demand, and a minimum 14 kWp solar photovoltaic (PV) array.</i></p> <p><i>(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:</i></p>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;</li> <li>- Confirmation of the necessary fabric efficiencies to achieve a minimum 29% reduction in carbon emissions, including details to reduce thermal bridging;</li> <li>- Confirmation of the modelled heat losses from the heating pipework in corridors and bedrooms;</li> <li>- Location, specification and efficiency of the proposed ASHPs (Seasonal Coefficient of Performance, Seasonal Performance Factor, Seasonal Energy Efficiency Rating), with plans showing the ASHP pipework and mitigation measures (noise, exhaust, visual);</li> <li>- Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the units;</li> <li>- Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp);</li> <li>- A metering strategy.</li> </ul> <p><i>The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.</i></p> <p><i>(b) Within six months of first occupation, evidence that the solar PV and ASHPs installation has/have been installed correctly shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, a six-month energy generation statement, and a Microgeneration Certification Scheme certificate.</i></p> <p><i>(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.</i></p> <p><i>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.</i></p> <p><u>Gas boiler(s)</u>  <i>All gas boilers that are to be installed throughout the development shall achieve a minimum seasonal space heating energy efficiency rating of 92% as defined under the Energy-related Performance Directive (ErP), without relying on additional technologies to control the operation of the boiler. The applicant shall demonstrate compliance by supplying installation specification within three months</i></p>	

Stakeholder	Question/Comment	Response
	<p><i>post-completion of the development. Once installed these boilers shall be operated and maintained as such thereafter.</i></p> <p><i>The use of the gas boilers shall be restricted to 30% of hot water demand only during the operation of the development, if and when the capacity cannot solely be met by the air source heat pump system.</i></p> <p><i>Reason: In the interest of reducing the impacts of climate change, in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><u>Overheating</u></p> <p><i>(a) Prior to above ground works, an updated Overheating Report modelling future weather files shall be submitted to and approved by the Local Planning Authority. The submission shall assess the future overheating risk and propose a retrofit plan. This assessment shall be based on the Dynamic Overheating Report prepared by Hodkinson (dated November 2021).</i></p> <p><i>This report shall include:</i></p> <ul style="list-style-type: none"> <li><i>- Further modelling of units modelled based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for: DSY1 2050s, high emissions, 50% percentile;</i></li> <li><i>- Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;</i></li> <li><i>- Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy.</i></li> </ul> <p><i>(b) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:</i></p> <ul style="list-style-type: none"> <li><i>- Natural ventilation</i></li> <li><i>- MVHR with summer bypass</i></li> <li><i>- Glazing g-value of 0.30</i></li> <li><i>- External shading including pergola structures on internal courtyard</i></li> <li><i>- No active cooling (except for specialist dayrooms, foyer and restaurant).</i></li> </ul> <p><i>REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><u>Living roofs</u></p>	

Stakeholder	Question/Comment	Response
	<p><i>(a) Prior to the commencement of development, details of the living roof(s) must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:</i></p> <ul style="list-style-type: none"> <li><i>i) A roof plan identifying where the living roof(s) will be located;</i></li> <li><i>ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm);</i></li> <li><i>ii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate</i></li> <li><i>iii) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m<sup>2</sup> of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m<sup>2</sup>, rope coils, pebble mounds of water trays;</i></li> <li><i>iv) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m<sup>2</sup>) and density of plug plants planted (minimum 20/m<sup>2</sup> with roof ball of plugs 25m<sup>3</sup>) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);</i></li> <li><i>v) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</i></li> <li><i>vi) Management and maintenance plan, including frequency of watering arrangements.</i></li> </ul> <p><i>(b) Prior to the occupation of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roof(s) have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof(s) shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.</i></p> <p><i>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i></p> <p><u><i>BREEAM Certification</i></u></p> <p><i>(a) Prior to commencement of development, a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”. The development shall then be constructed in strict</i></p>	

Stakeholder	Question/Comment	Response
	<p><i>accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.</i></p> <p><i>(b) Within three months prior to occupation of development, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.</i></p> <p><i>In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</i></p> <p><i>Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.</i></p>	
<b>Flood and Water Management</b>	<p>Thank you for re-consulting us on the above planning application following a receipt of revised submission from the applicant.</p> <p>Having reviewed the submitted information via applicant's letter dated 11th February 2022, we are content with the information and we have no further comments to make on the above planning application.</p>	Comments noted
<b>Nature Conservation</b>	<p>Documents</p> <p>A Preliminary Ecological Appraisal for the Proposed Development (Tyler Grange Ecological Impact Assessment Report No. 13786_R01a_AP_CW), comprising a desk study search for baseline information on designated sites, habitats and protected species, and a Preliminary Bat Roost Assessment (PBRA) within the Site has been prepared to current good practice guidance covering relevant legislation and policy.</p> <p>Conclusion</p> <p>The development seeks to enhance ecological features and the proposed mitigation and enhancement measures can be secured by appropriately worded planning conditions;</p> <ul style="list-style-type: none"> <li>Approximately half the total area of scattered trees within the site will be retained and protected from works. Trees outside the boundaries of the site will be protected from development works. Those habitats of up to local ecological importance that are proposed to be subject to habitat loss (namely, scattered trees) will be more than mitigated through the proposed habitat creation. These</li> </ul>	Comments noted. Conditions included

Stakeholder	Question/Comment	Response
	<p>enhancements will achieve a biodiversity net gain of +5.71% and are likely to offer nesting, foraging and commuting opportunities for species such as bats, birds, reptiles, amphibians and west European hedgehogs</p> <ul style="list-style-type: none"> <li>• The bat roost present within building B1 should be protected from disturbance and development activities until it can be carefully removed under a licence (such as a BLICL). An alternative roost location determined by the licenced ecologist should be provided as close to the previous roost location as possible, ideally integrated within building design.</li> <li>• Any vegetation removal should be undertaken outside of the core nesting bird season (March-August, inclusive), otherwise, a pre-works check by an Ecological Clerk of Works (ECoW) should be undertaken to determine whether active birds' nests are present. If nest(s) are present, no nests, eggs or young should be destroyed and an appropriate buffer must be instated until the chicks have been confirmed as fledged by an ECoW.</li> <li>• The mitigation and enhancement recommendations, such as the provision of bird and bat boxes, sensitive construction methods, a sensitive lighting strategy in relation to bats and a long-term management plan to secure the ecological enhancements that are proposed as part of the development <b>should</b> be controlled by appropriately worded planning conditions. <ul style="list-style-type: none"> <li>a) produced within the Construction Ecological Management Plan. Incorporating the mitigation and enhancements options from Bat survey report.</li> <li>b) To ensure the safeguarding of the proposed net gain. Include the creation of a Landscape Ecological Management and Maintenance Plan.</li> </ul> </li> </ul>	
<b>Trees</b>	<p>I hold no objection to the proposal providing the following conditions below are applied. The case has been supplied with arboricultural reports. The latest Arboricultural Impact Assessment is dated 22 March 2022 and has been carried out by Tyler Grange. The survey has been carried out to British Standard 5837 Trees in relation to design, demolition and construction- Recommendations. I concur with findings within the report, including section 3 sub section 3.4, the conclusions, and most of the tree quality classifications.</p> <p>The following conditions should be implemented and adhered to:</p> <ul style="list-style-type: none"> <li>• Plan 2 the Tree Protection Plan</li> <li>• Arboricultural Method Statements will be required for any works within the root protection areas</li> <li>• A Landscape Plan and aftercare programme</li> </ul>	Comments noted. Conditions included
<b>Waste Management</b>	<p>This is for a 70 bedroom residential care home with supporting facilities and infrastructure. The waste generated from this location will be considered commercial and as such the collection and disposal of waste here would not fall to the council to deliver. This is acknowledged within the D&amp;A statement (attached) on pg. 70 '<i>Waste collection will be undertaken by a private company who will serve the site using small vehicles, rather than lorries</i>'. Collections will be made via View Road with space within the</p>	Comments noted.

Stakeholder	Question/Comment	Response
	<p>curtilage of the development for collection vehicles to wait off road. From a traffic management perspective this is positive.</p> <p>Sizing of the bin store and the number of bins needed will very much depend on the businesses/services that occupy the space in operation, the waste/recycling they generate and the contract that is put in place for the collection of this. Commercial waste collection companies can provide up to twice daily collections 7 days per week. The drawings contained within the D&amp;A statement show bin store size to be 18m<sup>2</sup>. This is likely to be adequate however we would however advise against sizing the bins store based on minimum size and maximum collections. The store should be sufficient to store waste for one week.</p> <p>Comments dated 06/05/2022</p> <p>Looking at this one and the reason for the resubmission/consultation I do not believe that the amendments have any impact on the waste management requirements for this development and therefore my comments previously provided (see mail attached) remain valid.</p>	
<b>Building Control</b>	<p>I have now been able to review the BiA for this scheme and can advise that it meets your policy requirements subject to the following points that could be pre commencement conditions:</p> <ol style="list-style-type: none"> <li>1. Further details regarding the movement monitoring that will be undertaken at the adjacent properties. This should also include conditions of them before any works commence;</li> <li>2. Construction Management Plan to be provided;</li> </ol> <p>Full structural design will be provided at the Building Control stage.</p>	<p>Comments noted. Conditions included</p>
<b>Building Control</b>	<p>Further to the response to my initial comments, I agree that a more detailed fire strategy/fire engineered design will be required in order to satisfy Part B of the Building Regulations – Fire Safety. As noted in my previous response, this will be subject to a more detailed check by Building Control and the Fire Authority will be consulted.</p>	<p>Comments noted. Condition included</p>
<b>Public Health</b>	<p>Comments and applicants response dated 25/01/2022</p> <ol style="list-style-type: none"> <li>1. Do the room sizes take into account personal belongings space? <b>Yes. Circa 10 years ago, the minimum bedroom size to be registered by CQC was 12m<sup>2</sup>. The proposed rooms are generally 20m<sup>2</sup> + so are generously sized.</b></li> <li>2. Which units are accommodated for long stays and outpatient? <b>Long stay beds will be on the first floor which will provide residential care, and second floor, which will provide dementia care. Of the 70 beds proposed, circa 24 beds will provide short stay and circa 46 will provide long stay.</b></li> </ol>	<p>Comments noted. Applicant has provided a response</p>

Stakeholder	Question/Comment	Response
	<p>3. If second floor residents need to access bathroom, how easy is it for residents to travel to other floors for access? <b>The second floor has a designated spa bathroom. It should be noted that all en-suites are sized to fit a bath or walk-in shower. It is likely that a mix will be provided. We note generally that lifts and circulation stairs are sited either end of the building and one centrally, to aid circulation.</b></p> <p>4. Further possible improvements – garden planting space, raise bed where residents can take part in planting for foods and flowers. <b>This provision was intended and can, therefore, be incorporated in the proposals.</b></p> <p>5. We would like to see where the windows are on the floor plan. <b>These are shown at all levels.</b></p> <p>6. The Entrance door to the hydro pool is missing in the plans. <b>This is shown on the floor plans.</b></p> <p>7. Recommend a staff room in one of the upper floors <b>This is shown at the first floor level. See the North Hill end of the building.</b></p> <p>8. Residents living in care homes are at greater risk of oral health problems due to many reasons such as long-term conditions causing mobility issues and medication may affect oral health. Dental Health access for residents in care homes remains a challenge. We recommend a flexible space (i.e. possibly private room within hairdressers) which can be provided for health promotion work with clinicians i.e. oral health. More information: Oral health for adults in care homes NICE guideline 5 no. consultant rooms are provided at basement level and were intended to be used flexibly. Therefore, the consultant rooms can be used for this purpose or the treatment/medical spaces on the first floor, North Hill end. <a href="https://www.nice.org.uk/guidance/ng48/chapter/recommendations#general-dental-practices-and-community-dental-services">https://www.nice.org.uk/guidance/ng48/chapter/recommendations#general-dental-practices-and-community-dental-services</a></p> <p>Comments dated 02/02/2022</p> <p>Many thanks for your email. This is fine</p>	



Stakeholder	Question/Comment	Response
Supported Accommodation	<ol style="list-style-type: none"> <li>1. There is an extensive basement on this site and whilst there are some areas that may benefit from lightwells there are other areas that do not benefit from natural light. Whilst most of the areas in the basement are used for short visits such as to have a haircut or to watch a film there is also the main kitchen facility which means that kitchen staff will spend most of their day below ground with no access to natural light. <b>This is a model used in many new build facilities and with modern lighting, regular breaks and being out and about servicing the homes will not be any issue. This is also not a building regulations requirement.</b></li> <li>2.</li> <li>3. Circulation (corridors) <ol style="list-style-type: none"> <li>a. It is not clear what width the corridors are across the provision but for Good accessibility 1.8m min seems to be a guide to use. It would be useful to consider if it is possible to easily accommodate an ambulance trolley into each of the rooms to ensure that leaving the building can be done with ease should the resident become clinically unwell, this would include the size of lifts. <b>We provide a minimum 2m wide corridors which will therefore be easily accessible for emergency services.</b></li> <li>b. In terms of circulation the long length of corridors across the provision with no resting points would not promote people with limited mobility to be independent increasing the likelihood of dependence on wheelchairs. <b>In our experience, Building Control / Fire Officers are usually not keen on destination seating so this will require their approval in due course, prior to illustrating.</b></li> <li>c. Many of the corridors across the building come have dead ends which from a dementia friendly design <b>As mentioned earlier, only the second floor is to provide dementia care</b> perspective are not preferable suggestion for consideration of the ends of corridors being made into destination spaces. <b>As per above. Windows are provided in anticipation of this.</b> Equally personal rooms at the ends of corridors may encourage someone with cognitive impairment to enter these rooms.</li> </ol> </li> <li>3. Communal spaces <ol style="list-style-type: none"> <li>a. The lounge and dining spaces across the home seem to accommodate large numbers of residents which is not in line with dementia friendly design <b>Only the second floor provides dementia care</b> principles (smaller more intimate dining rooms are easier to manage and allow staff to monitor residents more effectively. <b>Second floor provides 20 no. dementia beds where the units are split into 2 no. 10 bed units. It has not yet been determined whether the lounges will become combined dining spaces. If this is the operational preference, this can be accommodated.</b></li> <li>b. There is a lack of activity spaces throughout the home for residents to undertake a variety of social, physical and cognitively stimulating activities such as Art, Writing, Games etc the lounge spaces only have arm chair/sofa seating no tables etc for these activities to take place. <b>The definition of 'cognitively stimulating activities' can be conducted anywhere including the resident's own bedrooms. 'Activities' start from the moment a resident wakes</b></li> </ol> </li> </ol>	Comments and applicants response noted

Stakeholder	Question/Comment	Response
	<p>and is, therefore, is conducted where that person wants to be, not necessarily grouping residents in a dedicated room. For this reason, the first floor will provide elderly care and includes large lounge, dining room and quiet lounge spaces. The quiet lounge will be a multi-function space that could be used for activity. The second floor provides dementia care and also has a quiet lounge which will also be a multi-function space. Ground floor provides short stay care so is a different purpose group.</p> <p>c. Residents on the third floor have no direct access to communal spaces, a communal terrace is included in the centre of the plan which will be staffed 24 hours per day there are also no staff spaces on that floor therefore would be interested on how these beds would be monitored and staffed to ensure that the residents are safeguarded. A dedicated nurse station is included centrally. The home will provide state of the art monitoring linked to nurse call systems. It is not the role of staff to put everyone into day rooms. It maybe that some residents enjoy being in their own room and staff would spend time with them in there accordingly.</p> <p>4. Garden Space</p> <p>5. The garden space appears to have been carefully thought out However, there is very limited direct access to the garden spaces for the residents. For a resident population that is likely to be frail/potentially with limited mobility this Garden space is key to ensuring that residents have access to the outdoors. I do not feel that the current design allows for easy access to the essential outdoor space. Any home with more than one floor can have the same issues but with obtaining a good assessment for each resident staff will be able to meet their needs and help them get to the most relevant area to meet their needs. There will be some residents who are fully able to access the gardens from floors 2 and 3 independently and will be encouraged to do so. At ground floor, main garden access is provided by the foyer, restaurant and corridor. All GF beds will have access to outdoor space. The first floor includes a number of balconies and guests will be encouraged down stair 1 and stair 2 to the nearest garden access point. Similar comment re garden access at second floor - we also note that this floor benefits from a dedicated terrace for use by dementia residents only.</p> <p>5. General Dementia Friendly Design Principles</p> <p>As this is a provision that is being specifically designed for older people it is advisable that the building is designed in line with Dementia Design Principles, although this provision isn't being specifically designed for dementia care there is a high probability that there will be residents living/staying within the home that will either have dementia or a cognitive impairment. I have picked up a few comments earlier around key requirements that immediately spring to mind but I would recommend that the provider consider undertaking the dementia design audit which is published by Stirling University <a href="https://dementia.stir.ac.uk/design/training-dementia-design-and-riba-cpd">https://dementia.stir.ac.uk/design/training-dementia-design-and-riba-cpd</a> as they are leaders in dementia friendly design. We are very aware of Stirling dementia principles and have incorporated what we can at this stage into the design. Example</p>	

Stakeholder	Question/Comment	Response
	unit sizes, destination points, bedroom doors not directly opposite, window proportions etc. The majority of design principles are linked to fit out and interior design yet to be appointed.	
<b>EXTERNAL</b>		
<b>London Fire Brigade</b>	<p>The Commissioner is satisfied with the proposal</p> <p>The Commissioner strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposal relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to business and housing providers and can reduce the risk to life. The Commissioner's opinion is that there are opportunities for developers and building owners to install sprinkler systems to save money, save property and protect the lives of occupiers. Please note that it is our policy to regularly advise our elected Members about how many cases there have been where we have recommended sprinklers and what the outcomes of these recommendations were. These quarterly reports to our Members are public documents which are available on our website.</p>	Comments noted. Informative included
<b>Environment Agency</b>	<p>We do not have any detail comments to make on this planning application apart from the FRSA comments below.</p> <p>The proposed development falls within Flood Zone 2, which is land defined in the planning practice guidance as being at risk of flooding.</p> <p>We have produced a series of standard comments for local planning authorities and planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. This proposal falls within this category.</p> <p>These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at <a href="https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice">https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice</a></p> <p>We recommend that you view our standing advice in full before making a decision on this application. We do not need to be consulted.</p>	Comments noted.
<b>The Greater London Archaeological</b>	<p><b>Recommend No Archaeological Requirement</b></p> <p>Thank you for your consultation dated 31 January 2022.</p>	Comments noted.

Stakeholder	Question/Comment	Response
<b>Advisory Service (GLAAS)</b>	<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 London Plan (2021 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>The site lies outside the new tier 3 Archaeological Priority Area for the mediaeval Bishop's Park. However key features of the park such as the park pale are unlikely to occupy this site. A watching brief next door at 101 North Hill in 2001 found no remains earlier than Victorian cellars. Although it is a bigger site than 57 North Hill, where this office advised no archaeological requirement in 2019, I do not advise that there is a significant enough archaeological issue at this site to merit a planning condition.</p> <p>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>	
<b>Historic England</b>	<p>Thank you for your letter of 31 January 2022 regarding the above application for planning permission. We refer you to the following published advice which you may find helpful in determining the application.</p> <p>In our view, the recent amendments to the elevational design of the proposed building has done much to reduce the visual impact on the significance and setting of the neighbouring Grade II listed Georgian terrace and the surrounding Highgate Conservation Area.</p> <p>We also suggest that you seek the views of your specialist conservation advisors, as relevant.</p> <p>This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.</p> <p>The full GLAAS consultation criteria are on our webpage at the following link:</p> <p><a href="https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-">https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-</a></p>	Comments noted.

Stakeholder	Question/Comment	Response
	<p><a href="#">advisory-service/our-advice/</a></p> <p>It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. If you would like detailed advice from us, please contact us to explain your request.</p>	
<p><b>Designing Out Crime Officer</b></p>	<p>Section 1 - Introduction:</p> <p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference to 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 not met with the project Architects to discuss Crime Prevention and Secured by Design (SBD) for the overall site.</p> <p>Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can be easily mitigated early if the Architects and or Developers maintain an ongoing dialogue to discuss this 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:</p> <p>In light of the information provided, we request the following Conditions and Informative:</p> <p>Conditions:</p> <p>(1) Prior to the commencement of above ground works to each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design'</p>	<p>Comments noted. Conditions/Informative included</p>

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	<p>Accreditation. The development shall only be carried out in accordance with the approved details.</p> <p>(2) Prior to the first occupation of each building or part of a building or use, 'Secured by Design' certification shall be obtained for such building or part of such building or use.</p> <p>Informative: The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p> <p>Section 3 - Conclusion: 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>	
Thames Water	<p><b>Waste Comments</b> Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</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-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>.</p> <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</p>	Comments noted. Informative included

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	<p>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-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>. 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>This site is affected by wayleaves and easements within the boundary of or close to your site. Thames Water will seek assurances that these will not be affected by the proposed development. The applicant should contact Thames Water Property Searches for information relating to the wayleave or easement if they have not already done this -<a href="https://www.thameswater-propertysearches.co.uk/">https://www.thameswater-propertysearches.co.uk/</a> To discuss the proposed development in more detail, the applicant should contact Developer Services - <a href="https://www.thameswater.co.uk/developers">https://www.thameswater.co.uk/developers</a></p> <p><b>Water Comments</b></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. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-ourpipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-ourpipes</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. 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>	

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<b>NEIGHBOURING PROPERTIES</b>	<p><b>Land use and housing</b></p> <ul style="list-style-type: none"> <li>- The new care home should not be used for any commercial interest</li> <li>- Concerns with the financial viability of the development</li> <li>- Concerns some of the proposed facilities will be for public use</li> <li>- Loss of care home facility</li> <li>- Concerns the proposed facility is more like a sports injury treatment and rehabilitation facility rather than a care home</li> <li>- Some of the uses are inconsistent with the existing use class</li> <li>- The internal and external environment is more like a hospital and inappropriate as a care home for residents</li> <li>- The proposed facilities are unlikely to be used by residents, however the rents would be very high</li> <li>- The applicant has failed to show the need for the various services</li> </ul>	<p><u>Land use and housing</u></p> <p>The proposed development would replace the existing care home (Use Class C2) with a new long term traditional care home with a smaller component operating as a well-being and physiotherapy centre;</p> <p>The other uses proposed are ancillary to the predominate use of the building as a care facility.</p> <p>The provision of traditional, long term senior care and well-being and physiotherapy centre is considered to meet an established local need and would provide adequate replacement accommodation</p>
	<p><b>Impact on Heritage assets</b></p> <ul style="list-style-type: none"> <li>- The height is not in keeping with the Conservation Area</li> <li>- The scale is a concern given its close proximity to the listed building</li> <li>- The preservation of the character of the conservation area needs to be properly assessed, the development would fail to preserve or enhance the character and appearance of the Conservation Area</li> <li>- The development will harm the settings of the listed buildings</li> <li>- The heritage assessment is incorrect</li> <li>- Substantial harm to the Conservation Area</li> </ul>	<p><u><b>Impact on Heritage assets</b></u></p> <p>The officers assessment on Heritage issues have been comprehensively explained in the main body of the report and addresses the objections raised by residents. Officers consider the</p>



Stakeholder	Question/Comment	Response
	<p data-bbox="499 932 785 959"><b>Size, Scale and Design</b></p> <ul data-bbox="541 997 1541 1360" style="list-style-type: none"> <li>- The design is not in keeping with surrounding properties</li> <li>- Overbearing in relation to neighbouring buildings</li> <li>- Excessive height, bulk, massing and scale</li> <li>- The development is significantly larger in scale than the existing buildings on site</li> <li>- Overdevelopment of site</li> <li>- Poor quality design</li> <li>- The development should be significantly reduced in scale</li> <li>- The scheme should be redesigned</li> <li>- Excessive footprint</li> <li>- The development is contrary to local plan policies and the NPPF</li> <li>- The Quality Review Panel comments have not been adequately addressed</li> <li>- The Councils pre-application advice has not been adequately addressed</li> </ul>	<p data-bbox="1730 233 2045 412">heights and massing of the proposed care home building fronting North Hill would fully respect the setting of the listed terrace in its urban context.</p> <p data-bbox="1730 477 2045 867">Officers consider the proposed scheme is acceptable from a conservation perspective, as it will lead to a very low, less than substantial harm to the significance of the conservation area and its assets while optimising the use of the site and its garden and while enhancing the townscape along North Hill</p> <p data-bbox="1730 899 2024 932"><b><u>Size, Scale and Design</u></b></p> <p data-bbox="1730 964 2024 1414">The conservation and design officers have assessed and considered these aspects of the proposed development comprehensively and which are covered in the main body of the report. Officers consider the proposal to be of a compatible and appropriate scale to the context, elegantly proportioned, finished in attractive, appropriate</p>

Stakeholder	Question/Comment	Response
	<p data-bbox="499 688 919 716"><b>Parking, Transport and Highways</b></p> <ul style="list-style-type: none"> <li data-bbox="548 753 831 781">- Pressure on parking</li> <li data-bbox="548 786 1703 841">- The wellbeing and physiotherapy centre will be open to none residents with implications for traffic and parking</li> <li data-bbox="548 846 909 873">- Increased traffic generated</li> <li data-bbox="548 1305 558 1317">-</li> <li data-bbox="548 1360 1419 1388">- Concerns the access road would not be sufficient for this development</li> <li data-bbox="548 1393 1146 1421">- The slip-road is designed for residential access</li> </ul>	<p data-bbox="1732 233 1997 321">materials and detailing and set in lush, high quality landscaping.</p> <p data-bbox="1732 386 2032 597">Officers consider all the specific concerns raised by officers and the QRP have been satisfactorily addressed and are contained within the main body of the report.</p> <p data-bbox="1732 688 2047 748"><b><u>Parking, Transport and Highways</u></b></p> <p data-bbox="1732 781 2047 1263">The Transportation Officer has assessed these points and which have been covered in the main body of the report; Officers raise no objections to the proposals subject to conditions being imposed in respect of gym restrictions and the outpatients facility to reduce the number of trips generated by the development and the resulting car parking demand on local roads.</p> <p data-bbox="1732 1333 2018 1393">The Council's Transportation team are</p>











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	<ul style="list-style-type: none"> <li>- There is no mention of green roofs</li> <li>- More details of the permeable paving is required</li> </ul> <p><b>Basement development</b></p> <ul style="list-style-type: none"> <li>- The potential impact of the basement development has not been adequately addressed</li> <li>- Risk of ground movement</li> <li>- Impact of basement development on the listed terrace</li> </ul>	<p>development including to the frontages along View Road and North Hill</p> <p>The urban greening factor which is a fundamental element of site and building design would also be an improvement to the existing</p> <p>A green roof is proposed on the flat roof to replace the roof plant that has been relocated. Further details of the living roof will be required prior to commencement of the development</p> <p>Details of the permeable paving proposed will be secured by way of a condition prior to the commencement of the development above slab level</p> <p><b><u>Basement development</u></b></p> <p>Officers consider that the submitted Basement Impact Assessment meets the local plan policy requirement. The councils Building Control Officer has advised that it will be the responsibility of the</p>



Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- Impact on ground and underground water courses</li> <li>- The basement is excessive in scale</li> <li>- Concerns of flooding</li> <li>- Impact on local drainage services</li> <li>- Subsidence</li> <li>- Where will attenuation tanks be located</li> <li>- Impact on hydrology</li> <li>- Proper monitoring arrangements should take place by the Council</li> <li>- Further data is required for phase 2 of the site investigation</li> <li>- The ground and groundwater conditions should be fully at adequately addressed at the planning stage</li> <li>- Incomplete basement assessment</li> <li>- Building Control have not taken into account Alan Baxter's submission</li> <li>- The Councils basement policy is poor</li> </ul> <p><b>Archaeology</b></p> <ul style="list-style-type: none"> <li>- An archaeology impact assessment is required as the site is located within the Highgate Archaeological Priority Area</li> </ul>	<p>structural engineer and the applicant to ensure that the basement construction is sound.</p> <p>The basement development is considered acceptable subject to a detailed construction management plan condition to ensure there would be no increased flood risk resulting from the development and no impact and a detailed movement monitoring condition that will need to be undertaken of the adjacent properties prior to the commencement of works on site</p> <p>The Greater London Archaeological Advisory Service (GLAAS) is satisfied that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest</p>

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	<p><b>Sustainability</b></p> <ul style="list-style-type: none"> <li>- The air source heat pump and other handling plant should be dealt with in detail as part of this application</li> <li>- Concerns with the potential impact of the plant</li> <li>- The plant will be highly visible from the public realm</li> <li>- Details of gas boiler flues, basement parking ventilation, kitchen extract and other plant are missing</li> </ul> <ul style="list-style-type: none"> <li>- A zero carbon building should be achieved</li> </ul> <p><b>Other</b></p> <p>-The proposed part M Building Regulations which provides information on access to and use of buildings needs to be stated</p>	<p>The roof plant has been relocated from the flat roof to a secluded area within the pitched roof volume. Further details of the air source heat pump and other handling plant will be secured by way of a condition prior to above ground construction. The plant will not be highly visible from the public areas.</p> <p>The Council's Carbon Management Team supports the scheme based on its carbon reductions. The shortfall of the care home will need to be offset to achieve a zero-carbon target, in line with Policy. This figure would be secured by legal agreement.</p> <p>Paragraph 5.2.11 of the report provides information on access A formal detailed assessment will be undertaken at the building control stage</p>

Stakeholder	Question/Comment	Response
	<p data-bbox="499 233 1619 261"><b><u>Issues raised that are not material planning considerations including Officers comments</u></b></p> <ul style="list-style-type: none"> <li data-bbox="548 297 1661 354">- No site notice placed outside the development (Officer comments: A site notice was placed outside the development);</li> <li data-bbox="548 358 1604 415">- Consultation period was not long enough (Officer Comments: Consultation period was extended at least twice and further notification carried out on the amended plans);</li> <li data-bbox="548 420 1640 477">- Developer's drawings are misleading (Officer comments: Drawings have been updated to address specific points);</li> <li data-bbox="548 482 1688 539">- The consultation was not wide enough (Officers comments: The consultation was undertaken in accordance with The Council's Statement of Community Involvement);</li> <li data-bbox="548 544 1703 719">- Consultation process not adequate (Officers comments: The consultation process was adequate consisting of a DM Forum where residents were invited and which was well attended before submission of the planning application; the scheme was presented to members in a public forum at pre-application stage. Once the application was submitted, the Council consulted residents twice by letter, extended the consultation period at least twice. The application was able to be viewed on the councils website);</li> <li data-bbox="548 724 1703 873">- Feedback from Statement of Community engagement is not correct (Officers comments: The Statement of Community involvement (SCI) is the applicant's reporting of the feedback as they understand it to be. Officers have assessed the SCI alongside the comments from objectors and then made a balanced assessment of how the feedback has been summarised in the document)</li> <li data-bbox="548 878 1654 935">- Inaccurate and misleading CGIs and graphic (Officers comments: CGIs and graphics have been updated so to remove any inaccuracies or misunderstanding of the plans)</li> <li data-bbox="548 940 1451 967">- The comparative drawings are misleading (Officers comments: as above)</li> <li data-bbox="548 972 1682 1029">- Inaccurate, missing and conflicting submission (Officers comments: As above. The Applicant submitted a number of further drawings when requested following consultation feedback)</li> <li data-bbox="548 1034 1661 1083">- Existing plans should be submitted (Officers comments: existing plans and elevations have been submitted)</li> </ul>	<p data-bbox="1732 233 1997 321">ALL RESPONSES IN BRACKETS NEXT TO THE OBJECTION.</p>

