

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2022/0859

Ward: Noel Park

Address: Barbara Hucklesby Close N22 6PQ

Proposal: Demolition of existing eight bungalows and the construction of a part one, two and three-storey building to provide supported living accommodation (Use Class C2) comprising 14 one-bedroom homes, a support office and communal garden. Provision of two wheelchair accessible parking bays, refuse/recycling and cycle stores and landscaping.

Applicant: Haringey Council

Ownership: Council

Case Officer Contact: Gareth Prosser

Date received: 11/03/2022

1.1 The application has been referred to the Planning Sub-Committee for decision as it is a major application that is on Council land.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposal provides high quality specialist accommodation in the form of supported living (Use Class C2) comprising 14 one-bedroom homes, a support office and communal garden, appropriate support and management will be provided. These homes will be for council rent and meet an identified need for adults with mental health needs, who are ready for a more independent lifestyle.
- Planning policy recognises the important role and contribution that small sites such as this play in meeting an identified need for new housing in the borough. The site is within an established neighbourhood with good access to public transport and existing neighbourhood facilities, where planning policy expects additional housing at a greater density than existing. This is subject to a design-led approach to the development of the site, which was carried out here to capitalise on the opportunities and location of the site to bring forward new homes. In land-use terms, the proposal is strongly supported in principle.
- The development would be of a high-quality design which responds appropriately to the local context.
- The proposal provides a comprehensive hard and soft landscaping scheme. Nine new semi-mature trees will be planted across the site.
- The size, mix, tenure, and quality of accommodation are acceptable and either

meet or exceed relevant planning policy standards. All flats have external amenity space.

- The proposal has been designed to avoid any material harm to neighbouring amenity in terms of a loss of sunlight and daylight, outlook, or privacy, in terms of excessive noise, light or air pollution.
- The proposed development is car free (except for 2 wheelchair-accessible spaces) and high-quality storage for cycles is provided. The site's location is accessible in terms of public transport routes and the scheme is also supported by sustainable transport initiatives.
- High performance energy saving measures form part of the proposal, which would also include air source heat pumps and photo-voltaic panels.
- The proposal would have a negligible impact on the historic built environment, which is considered acceptable when it is weighted against the public benefits of the proposal.
- The proposed development will secure several planning obligations including financial contributions to mitigate the residual impacts of the development.

2. RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability is authorised to issue the planning permission and impose conditions and informatics subject to the signing of a legal agreement providing for the obligations set out in the Heads of Terms below.
- 2.2 That delegated authority be granted to the Head of Development Management or the Assistant Director Planning, Building Standards and Sustainability to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee.
- 2.3 That the agreement referred to in resolution (2.1) above is to be completed no later than 31st October 2022 within such extended time as the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability shall in her/his sole discretion allow; and
- 2.4 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission be granted in accordance with the Planning Application subject to the attachment of the conditions.
- 2.5 Planning obligations are usually secured through a S106 legal agreement. In this instance the Council is the landowner of the site and is also the local planning authority and so cannot legally provide enforceable planning obligations to itself.

- 2.6 Several obligations which would ordinarily be secured through a S106 legal agreement will instead be imposed as conditions on the planning permission for the proposed development.
- 2.7 It is recognised that the Council cannot commence to enforce against itself in respect of breaches of planning conditions and so prior to issuing any planning permission measures will be agreed between the Council's Housing service and the Planning service, including the resolution of non-compliances with planning conditions by the Chief Executive and the reporting of breaches to portfolio holders, to ensure compliance with any conditions imposed on the planning permission for the proposed development.
- 2.8 The Council cannot impose conditions on planning permission requiring the payment of monies and so the Director of Placemaking and Housing has confirmed in writing that the payment of contributions for the matters set out below will be made to the relevant departments before the proposed development is implemented.
- 2.9 Summary of the planning obligations for the development is provided below:
1. Carbon offset contribution
 - Carbon offset contribution if the zero-carbon policy requirement is not met, at £2,850 per tCO₂.
 - 'Be Seen' commitment to upload energy performance data.
 2. Car-Capped Agreement including a £4,000 contribution to amend the Traffic Management Order
 3. Car Club Membership Subsidies

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3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1 Proposed development

3.1.1. This is an application for:

- Demolition of existing eight bungalows
- Construction of a part one, two and three-storey building to provide supported living accommodation (Use Class C2) comprising 14 one-bedroom homes,
- Resident support office
- Communal garden
- Provision of two wheelchair accessible parking bays
- Provision of refuse/recycling and cycle stores and landscaping
- Plant room

3.1.2. The proposed accommodation is affordable, supported living housing for council rent, catering for adults with mental health needs who are ready to step-down from intensive/high-cost residential placements into a more independent lifestyle.

3.1.3. The proposed 14 homes are contained within a part one, two and three-storey building forming a linear block of development along The Sandlings with primary access, as existing, from Russell Avenue and service access from The Sandlings. A landscaped courtyard providing a communal amenity space features in the centre of the site serving the new dwellings.

3.1.4. The proposal includes cycle parking, mobility scooter and refuse/recycling storage facilities. Individual Air Source Heat Pumps are provided for each dwelling to cater for heating requirements. At roof level provision is made for photo-voltaic panels and green roofs.

3.1.5. New planting including trees, surfacing, seating, lighting and CCTV are part of a comprehensive landscaping scheme

3.1.6. The existing small parking area off Russell Avenue will be reconfigured as part of the redevelopment of the site and two off-street wheelchair accessible car parking spaces with electric charging points provided to serve two proposed wheelchair user homes. Except for these, the proposed development is intended to be car-free.

Site and Surroundings

3.1.7. Barbara Hucklesbury Close is a backland site accessed via Russell Avenue. The site currently consists of 8 one-storey bungalows, which are used as temporary accommodation for people awaiting permanent council housing which were built around 1975 for elderly residents. All tenants have been relocated and the bungalows are now empty. The site also hosts a UK Power Networks sub-station which is also accessed off Russell Avenue.

3.1.8. The irregular-shaped site sits in-between The Sandlings Estate and traditional two-storey houses on Meads Road and Russell Avenue. The Sandlings Estate is to the southwest

of Barbara Hucklesbury Close and consists of five-storey housing blocks built in the 1970s. The Sandlings has a number of mature trees lining the road.

- 3.1.9. Traditional terraced housing is located to the northeast of the site along Meads Road and Russell Avenue, which form part of the Noel Park Conservation Area. The entrance to the site just falls within the Noel Park Conservation Area but otherwise the site is not covered by any specific planning policy designations. The site does not affect the setting of any locally or statutorily listed buildings or any other planning designations.
- 3.1.10. The Public Transport Accessibility Level (PTAL) of the site is 5, regarded as being 'very good' access by Transport for London. It is within a 10-15-minute walking distance from Wood Green Underground Station to the north-east and Turnpike Lane Underground to the south and numerous bus-stops on Wood Green High Street and Westbury Avenue.
- 3.1.11. The local area offers a wide range of retail and commercial facilities centred along Wood Green High Street and Green Lanes to west and south, in addition to a wide range of community related uses including nurseries, schools, leisure facilities and parks and open spaces. In respect to the latter these include Wood Green Common, Russell Park, Ducketts Common and Belmont Recreation Ground.

3.4 Relevant Planning and Enforcement history

- 3.1.1. No relevant history.
- 3.1.2. Formal pre-application engagement has been undertaken with the Local Planning Authority (LPA).

4. CONSULTATION RESPONSE

3.2. Application Consultation

- 3.2.1. The following were consulted regarding the application:

- 1) LBH Adult and Health Services
- 2) LBH Carbon Management
- 3) LBH Cleansing
- 4) LBH Pollution Air Quality Contaminated Land
- 5) LBH Conservation Officer
- 6) LBH Drainage
- 8) LBH Building Control
- 9) LBH Design Officer
- 10) LBH Transport Planning
- 11) LBH Health in All Policies Officer
- 12) London Fire Brigade - Fire Safety Regulation
- 13) Designing Out Crime Officer
- 14) (R) Sandlings Residents Association
- 15) (R) Noel Park Residents Association
- 16) Transport For London
- 17) Noel Park CAAC
- 18) Thames Water Utilities
- 19) Environment Agency

20) Mayor's Office for Policing and Crime

The following responses were received:

Internal:

- 1) Carbon Management: No objection, subject to conditions.
- 2) Pollution: No objection, subject to conditions.
- 3) Trees: No objection, subject to conditions.
- 4) Transportation: No objections, subject to conditions.
- 5) LBH Design: Support.
- 6) LBH Waste: No objection, subject to further details (condition).
- 7) LBH Building Control: The proposed housing development fire strategy appears to comply with Requirement B of the Building Regulations.
- 8) LBH Drainage: No objections, subject to conditions.

External:

- 9) Thames Water: No objection, subject to conditions.
- 10) Interim Recycling Manager: No objection.
- 11) London Fire Brigade: No comments received.
- 12) Secure by Design/ Met Police: No objections, subject to condition.

5. LOCAL REPRESENTATIONS

5.1 The following were consulted:

- 299 Neighbouring properties
- Noel Park CAAC
- The Sandlings RA
- Noel Park RA
- 3 site notices were erected close to the site

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

No of individual responses: 6

Objecting: 6

5.3 The following local groups/societies made representations:

- None

5.4 The following Councillor made representations:

- None

5.5 The issues raised in representations that are material to the determination of the application are set out in Appendix 1 and summarised as follows:

- Safety concerns regarding proposed residents
- Impact on water pressure
- Loss of mature trees
- Loss of daylight/sunlight to nearby properties
- Increased noise
- Rehousing of existing residents
- Impact on local services
- Loss of privacy
- Impact of increased parking
- Impact on Noel Park/Loss of bungalows

5.6 The following issues raised are not material planning considerations:

- Disruption from construction works (Officer Comment: conditions are applied requesting a Construction Management Plan. Hours of operation are limited)
- Impact on property values (Officer Comment: This is a private matter and therefore not a material planning consideration)

6 MATERIAL PLANNING CONSIDERATIONS

Statutory Framework

6.1.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.

6.1.1 The main planning issues raised by the proposed development are:

1. Principle of the development
1. Design and impact on the character and appearance of the surrounding area
2. Character and appearance of the conservation area
3. The impact on the amenity of adjoining occupiers
4. Landscape and Biodiversity
5. Housing Mix, Tenure and Quality of Accommodation
6. Parking and highway safety/ waste recycling and servicing
7. Sustainability, Energy and Climate Change
8. Crime Prevention
9. Flood risk & Drainage
10. Air quality
11. Land contamination
12. Trees

6.2 Principle of the development

National Policy

- 6.2.1 The 2021 National Planning Policy Framework (NPPF) establishes the overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process. It advocates policy that seeks to significantly boost the supply of housing and requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing.
- 6.2.2 Paragraph 69 notes that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. To promote the development of a good mix of sites local planning authorities should support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.

Regional Policy – the London Plan

- 6.2.3 The London Plan (2021) Table 4.1 sets out housing targets for London over the coming decade, setting a 10-year housing target (2019/20 – 2028/29) for Haringey of 15,920, equating to 1,592 dwellings per annum.
- 6.2.4 Policy H1 ‘Increasing housing supply’ states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially sites with existing or planned public transport accessibility levels (PTALs) 3-6 or which are located within 800m of a station or town centre boundary.
- 6.2.5 Policy H8 ‘Loss of existing housing and estate redevelopment’ states that the loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. Loss of hostels, staff accommodation and shared and supported accommodation that meet an identified housing need should be satisfactorily re-provided to an equivalent or better standard
- 6.2.6 Policy H2A outlines a clear presumption in favour of development proposals for small sites such as this (below 0.25 hectares in size). It states that they should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on them to significantly increase the contribution of small sites to meeting London’s housing needs. It sets out (table 4.2) a minimum target to deliver 2,600 homes from small sites in Haringey over a 10-year period. It notes that local character evolves over time and will need to change in appropriate locations to accommodate more housing on small sites.
- 6.2.7 London Plan Policy H4 requires the provision of more genuinely affordable housing. The Mayor expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site.
- 6.2.8 London Plan Policy D6 seeks to optimise the potential of sites, having regard to local context, design principles, public transport accessibility and capacity of existing and future transport services. It emphasises the need for good housing quality which meets relevant standards of accommodation.

Local Policy

- 6.2.9 The Haringey Local Plan Strategic Policies DPD (hereafter referred to as Local Plan), 2017, sets out the long-term vision of the development of Haringey by 2026 and sets out the Council's spatial strategy for achieving that vision. While this is not an 'allocated site' for larger-scale housing growth, not all housing development will take place in allocated sites. The supporting text to Policy SP2 specifically acknowledges the role these 'small sites' play towards housing delivery.
- 6.2.10 Local Plan policy SP2 states that the Council will aim to provide homes to meet Haringey's housing needs and to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the minimum target including securing the provision of affordable housing.
- 6.2.11 The Development Management DPD (2017) (hereafter referred to as the DPD) is particularly relevant. Policy DM10 seeks to increase housing supply and seeks to optimise housing capacity on individual sites such as this. Policy DM13 makes clear that the Council will seek to maximise affordable housing delivery on sites.
- 6.2.12 Policy DM15 states that the Council will support proposals for new special needs housing where it can be shown there is an established local need for the form of special needs housing sought having regard also to the aims and recommendations of Haringey's Housing Strategy and Older People Strategy.
- 6.2.13 The Council at the present time is unable to fully evidence its five-year supply of housing land. The 'presumption in favour of sustainable development' and paragraph 11(d) of the NPPF should be treated as a material consideration when determining this application, which for decision-taking means granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusal or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole. Nevertheless, decisions must still be made in accordance with the development plan (relevant policies summarised in this report) unless material considerations indicate otherwise (of which the NPPF is a significant material consideration).

Assessment

- 6.2.14 This proposal seeks to provide 100% of the housing as supported accommodation at council rent which would satisfy the above planning policy requirements. Whilst the existing housing on site is to be lost, it will be replaced by new housing at a higher density, exceeding the floorspace of the existing. The proposal is also considered to provide a far superior standard of accommodation to that of the existing.
- 6.2.15 Officers note that the surrounding area is an established residential area which includes a range of tenures, including private rent, owner-occupation and council rent. The proposal would therefore contribute to a mixed and balanced community and make a significant contribution to delivery of the Borough wide affordable housing target.
- 6.2.16 The existing site is located in an established and accessible residential area and comprises eight bungalows used as temporary accommodation and a small parking area in the Council's ownership. A sub-station is also located within the boundary of the site. The bungalows are in poor condition with no architectural or historic value. Only one is

currently occupied. The applicant and the Council's Move-on Team have been liaising closely with residents to ensure that appropriate alternative accommodation is provided. As such, the proposed demolition is acceptable.

Supported Living at Council Rent

- 6.2.17 Paragraph 121 of the NPPF states that local planning authorities should take a positive approach to applications for alternative uses of land which are currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. The principle of "Supported living accommodation (C2) is therefore considered acceptable having regard to the current use and location of the site.
- 6.2.18 The majority of site is in an area with a PTAL of 5, regarded as being 'very good' access by Transport for London. In particular, the site is located within a 10-15-minute walking distance from Wood Green Underground Station to the north-east and Turnpike Lane Underground to the south and numerous bus-stops on Wood Green High Street and Westbury Avenue. There are also a significant range of shopping facilities and other local amenities including recreational open space close-by. According to London Plan Policy H1 referenced above, this type of brownfield location is a key source of housing capacity.
- 6.2.19 The redevelopment of this site for a greater number of homes will contribute to the Borough's housing target for the period from 2015-2026 in accordance with Strategic Policy 2. This also aligns with the thrust of the London Plan which identifies a pressing need for more homes including affordable homes. London Plan and Local Plan policies also support specialist accommodation to ensure that all housing needs are appropriately met in the Borough. The main aim of the housing provision proposed at Barbara Hucklesbury Close is to provide supported housing for adults with mental health needs, who are ready to step-down from intensive/high-cost residential placements into a more independent lifestyle.
- 6.2.20 Policy DM15 supports proposals for new special needs housing where it can be shown that there is an established local need for the form of special needs housing sought having regard also to the aims and recommendations of Haringey's Housing Strategy and Older People Strategy.
- 6.2.21 LBH Adult and Health Services states that the proposed development responds to the unmet need for specialist accommodation for people affected by poor mental health, who require medium-term support to live independently. As such, there is considered to be an established local need and the proposal will make a significant positive contribution to the lives of a variety of vulnerable groups in the borough.
- 6.2.22 The policy also required that standard of housing and facilities are suitable for intended occupiers in terms of the provision of appropriate amenity space, parking and servicing the level of independence; and level of supervision, management and care/support.
- 6.2.23 LBH Adult and Health Services have advised that prior to acceptance into this housing, an assessment will be undertaken with each potential resident, which will serve to inform the decision regarding their suitability for the accommodation. Each resident in the accommodation will receive a personalised package of care, designed specifically to meet their individual needs.

- 6.2.24 Each resident will be assigned their own support worker. There will be out-of-hours telephone support available to residents. In case of emergency and this is fortified with the inclusion of a Duty Manager on-call 24 hours for every day of the year, who our staff can contact in the event of an emergency at any one of our services. Neighbours will be offered a contact sheet when the service opens, detailing the names and contact details of staff and managers they can contact should any questions or concerns arise.
- 6.2.25 The proposal is therefore considered to provide appropriate levels of independence, supervision, management and support. The quality of accommodation is assessed below in detail under quality of accommodation below.
- 6.2.26 The site has a good level of accessibility to public transport, shops, services and community facilities as required by Policy DM15. And given the on-site support the impact of the proposed development would not be detrimental to the amenity of the local area or to local services.
- 6.2.27 The proposed development has been designed to optimise the delivery of high-quality affordable supported homes and spaces and to enhance the local environment having regard to neighbouring residential amenity and the character and appearance of the surrounding area.
- 6.2.28 As such, the principle of new supported living accommodation at council rent levels is considered acceptable subject to all other material considerations. The land at Barbara Hucklesbury Close is a brownfield location, close to sustainable transport connections in an established residential area and the principle of residential use in this location is supported by national, regional and local policy, which identify housing as a strategic need.

6.3 Design and Impact on The Character and Appearance of The Surrounding Area

National Policy

- 6.3.1 Chapter 12 of the NPPF (2021) states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.3.2 It states that, amongst other things, planning decisions should ensure that developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development and be visually attractive due to good architecture, layouts, and appropriate and effective landscaping.

Regional Policy – London Plan

- 6.3.3 The London Plan (2021) policies emphasise the importance of high-quality design and seek to optimise site capacity through a design-led approach. Policy D4 notes the importance of scrutiny of good design by borough planning, urban design, and conservation officers (where relevant). It emphasises the use of the design review process to assess and inform design options early in the planning process (as taken place here).

- 6.3.4 Policy D6 concerns housing quality and standards and notes the need for greater scrutiny of the physical internal and external building spaces and surroundings as the density of schemes increases due the increased pressures that arise. It includes qualitative measures such as minimum housing standards.

Local Policy

Policy SP11 of the Haringey Local Plan requires that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use.

Policy DM1 of the DM DPD requires development proposals to meet a range of criteria having regard to several considerations including building heights; forms, the scale and massing prevailing around the site; the urban grain; and a sense of enclosure. It requires all new development to achieve a high standard of design and contribute to the distinctive character and amenity of the local area.

Assessment

- 6.3.5 The proposed development is designed to respect the character and appearance of the surrounding area whilst optimising the use of the site for affordable housing having regard to its location close to the Wood Green District Centre; a designated Primary Shopping Centre. In particular, the scale and form of the buildings reflect the shape of the site and the nature of the local built environment.
- 6.3.6 The Council's design officer has been consulted and notes that the proposal seeks to reflect the predominant terraced pattern of development in the area and varies in height from one to three storeys, to respond to the adjoining scale of the existing neighbouring properties. This variation in height breaks down the overall scale and massing of the proposal, softening its presence in the wider townscape and respecting the more modest dwellings of Noel Park to the north whilst also acknowledging the larger, urban form of The Sandlings Estate to the south.
- 6.3.7 The siting of the structure creates a stronger edge to the north side of The Sandlings, creating a traditional street layout with structures either side. The design officer considers this to be a substantial improvement to The Sandlings, which suffers from poor urban form with ill-defined edges and poor natural surveillance. The proposed massing sits comfortably between the 4.5 storey Sandlings Estate and the 2 storey terraces facing Russell Avenue and Meads Road, transitioning down in scale and bridging between the two typologies. The design officer notes that the generous fenestration increases overlooking and natural surveillance of the Sandlings, improving the sense of safety and overall attractiveness of this quiet street.
- 6.3.8 The proposal will be constructed using high-quality masonry and incorporates well-proportioned and recessed windows with vertical piers and carefully placed framed and open balconies/terraces. The simple articulation of the elevations seeks to complement the proportions of the building and provide a structured and robust architectural language. The design officer notes that this approach, whilst providing a contemporary structure, has a softer 'human scale' with modest massing, further broken-down with recesses and projections and generous fenestration and balconies, providing strong

interaction between the proposed building, its interiors and activities with the ground floor spaces below.

- 6.3.9 The design officer notes that the warm toned materials including a red brick, pick-up on the general materiality within the local area whilst also adding to the domestic appearance of the proposal. Additional brickwork detailing, stone and metalwork provide contrast and further visual interest to the building facades.
- 6.3.10 The proposal is considered to be an attractive and contemporary building which responds to the form and function of the proposed accommodation whilst having regard to the varied architecture within the surrounding townscape. As such the proposal is considered in accordance with the above policies.

6.4 Character and Appearance of the Conservation Area

- 6.4.1 London Plan (2021) Policy HC1 seeks to ensure that development proposals affecting heritage assets and their settings, should conserve their significance. This policy applies to designated and non-designated heritage assets. Local Plan Policy SP12 and DPD Policy DM9 set out the Council's approach to the management, conservation and enhancement of the Borough's historic environment.
- 6.4.2 DPD Policy DM9 states that proposals affecting a designated or non-designated heritage asset will be assessed against the significance of the asset and its setting, and the impact of the proposals on that significance; setting out a range of issues which will be taken into account. In relation to extensions or alterations to residential buildings, including roof extensions, Policy DM9 requires proposals to be of a high, site specific, and sensitive design quality, which respect and/ or complement the form, setting, period, architectural characteristics, detailing of the original buildings, including external features such as chimneys, and porches. The policy also requires the use of high-quality matching or complementary materials, in order to be sensitive to context.
- 6.4.3 The setting of a heritage asset is defined in the glossary to the NPPF as: "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral". There is also the statutory requirement to ensure that proposals 'preserve or enhance' the conservation area.
- 6.4.4 Noel Park CA covers a substantial area to the north of the application site. The main visibility from the Conservation Area is from the existing Russell Avenue access which will become the main access point to the proposed development. Most of the proposed building is obscured by the existing housing along Russell Avenue which lies just within the Conservation Area. The most significant view of the structure outside of the conservation area is from the Sandlings. Where the proposed development is visible, the impact is limited and it not considered to result in significant harm to the character and appearance of the Conservation Area.
- 6.4.5 In summary, the proposal would have a negligible impact on the surrounding heritage assets. In line with paragraph 202 of the NPPF this must be treated as less than substantial harm, when weighed against the public benefits of the proposal, which includes car-free supported living accommodation designed to a high standard and

increased greenery and biodiversity. The proposal is considered acceptable and sufficient to satisfy planning policy. The proposal is considered to preserve the character and appearance of the conservation areas.

6.5 Impact on the amenity of adjoining occupiers

- 6.5.1 London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, and states that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing. London Plan Policy D14 requires development proposals to reduce, manage and mitigate noise impacts.
- 6.5.2 Policy DM1 of the DM DPD states that development proposals must ensure a high standard of privacy and amenity for a development's users and neighbours. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land, and to provide an appropriate amount of privacy to neighbouring properties to avoid material levels of overlooking and loss of privacy and detriment to amenity of neighbouring resident
- 6.5.3 The position and scale of the proposed development in relation to neighbouring buildings ensures that the outlook, privacy and level of sunlight/daylight enjoyed by existing residents will not be adversely affected.
- 6.5.4 The proposed building is sited and designed with regard to its impact on neighbouring residential amenity. The building is set away from the adjoining boundaries and the heights of the proposed building limited to between one and three storeys, to reflect the modest scale of the surrounding existing buildings. This also ensures levels of sunlight/daylight, outlook and privacy received by existing neighbours is not detrimentally affected.

The Sandlings

- 6.5.5 The siting of the proposed housing creates a stronger edge to the north side of The Sandlings, where the impact to the existing estate to the south would resemble that of most streets with structures either side. The proposed structure would be situated approximately 17-18m away from the Sandlings Estate. This is considered acceptable, improving the urban nature of the street when viewed from the Sandlings and would not have a significant, overhearing impact on the existing estate, which remains the more dominant of the two structures. The impact of the proposal is further softened by the significant group of trees that line the north side of The Sandlings providing natural screening between the properties. These species are to be retained as part of this development proposal.

Noel Park

- 6.5.6 The proposed linear block is located at the furthest distance possible away from the backs of the residential properties that face Russell Avenue (to the north west) and Meads Road (to the north east). The proposal encloses a central garden, effectively creating a perimeter block. With its modest heights of between one and three storeys (the central, three storey section located furthest away from the aforementioned properties) and with distances of at least 21m between the taller sections of the proposal

and the existing homes, the level of overlooking is not considered significant. Officers acknowledge a level of inter-visibility between the existing and proposed properties, however this is considered typical within an urban setting and characteristic of the surrounding townscape of perimeter blocks and structured street pattern.

- 6.5.7 A sunlight/daylight assessment has been carried out which demonstrates that adjoining properties bounding the site will not be unduly affected by the proposed development in this regard.
- 6.5.8 As such the proposal is not considered to have a significant, detrimental impact on the amenity of the existing properties in accordance with the above policies.

6.6 Landscaping & Biodiversity

- 6.6.1 In addition to the general design-led policies in the previous section, London Plan (2021) Policy G4 seeks to “promote the creation of new areas of publicly accessible open space” as well as “enhance open spaces to provide a wider range of benefits for Londoners”. London Plan Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design.
- 6.6.2 London Plan Policy G6 seeks to manage impacts on biodiversity and aims to secure biodiversity net gain. London Plan Policy S4 states the need to provide new play facilities as part of development proposals, with at least 10m² of play space per child provided which meets several criteria.
- 6.6.3 Local Plan Policy SP11 promotes high quality landscaping on and off-site and Policy SP13 seeks to protect and improve open space and providing opportunities for biodiversity and nature conservation, including provision of formal play space to standards set out in the Mayor’s SPG Providing for Children’s and Young People’s Play and Informal Recreation.
- 6.6.4 DPD Policy DM1 requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to respond to trees on or close to a site. Policy DM21 expects proposals to maximise opportunities to enhance biodiversity on-site.
- 6.6.5 The application proposes full redevelopment of the site providing new high-quality supported affordable housing. This offers the opportunity to significantly improve the site with high-quality landscaping as well as enhancing the visual and residential amenity of the immediate area.
- 6.6.6 The existing site, whilst bordered by mature and semi-mature trees (mainly lining The Sandlings) has poor quality green space around the existing dwellings formed of unused and poorly maintained spaces which have no clear sense of ownership.
- 6.6.7 A number of key objectives have guided the landscaping strategy including:
- Creating safe and attractive spaces and routes.
 - Providing spaces for relaxation
 - Substantial new planting including new trees.

- Mitigate surface water accumulation through Sustainable Drainage Systems (SuDS)
- Enhance biodiversity.
- Encouraging a more active street scape by creating a safe and attractive building line to The Sandlings
- Provide a sense of place through the layout of the communal areas, surface and boundary treatments.
- Provide convenient and secure refuse/recycling and cycling storage facilities.

6.6.8 The landscaped areas comprise the entrance court, the boundary to The Sandlings, a communal amenity space and private terraces. All places are designed to make use of hard-wearing, sustainable surfaces which will complement the materiality of the proposed building, and will weather attractively. Soft landscape materials have been chosen to enhance the landscape setting and provide softness and colour throughout the seasons. Officers consider the proposed landscaping a high quality and sensitive design that compliments the proposed supported living units, recognising the positive impact of the green space of the future occupiers of the site.

6.6.9 There are a number of trees adjacent to the site, particularly along The Sandlings. It is proposed that two existing trees (T5 and T12) within the site be removed (refer to Trees section 6.14). An additional nine trees will be planted to mitigate this loss; a substantial improvement to the existing given the limited value of the existing species. The mature trees lining The Sandlings and just outside the site will be retained with some of the tree branches trimmed back. This is considered acceptable.

6.6.10 As discussed in the section 6.14, the submitted Arboricultural Assessment gives consideration to the tree root protection zones for these trees as part of the construction of the proposed development to ensure their long term protection. It is proposed to construct the foundations on piles with the ground beams located above the level of the highest roots, so the proposed development is unlikely to impact on the retained trees.

6.6.11 In terms of ecology, a walk-over survey was conducted on 5th May 2021, in addition to a desktop study being undertaken to determine the presence of any important habitats or species which might be impacted by the proposed development. The survey concluded that the existing site is of negligible value to wildlife. The habitat surveys undertaken recorded no evidence of any protected species of any significance, nor did they highlight any biodiversity feature of significance.

6.6.12 The landscape proposals are considered to significantly increase biodiversity through planting (including green roofs) and species to the site, such as bats and birds, by providing suitable nesting solutions.

The Urban Greening Factor (UGF)

6.6.13 An assessment of the Urban Greening Factor (UGF) has been undertaken, based on the surface cover types and areas within the application boundary. The proposal has an Urban Greening Factor of 0.45, which exceeds the London Plan target score of 0.4 for predominantly residential developments.

6.6.14 The proposed development presents a comprehensive landscaping scheme to cater for the specific needs of the resident group, ensuring the setting of the new homes is attractive, green, and safe and complements and enhances the character and

appearance of the surrounding area. New planting including trees, raised planters, permeable surfacing, seating and lighting feature as part of the treatment of the site.

- 6.6.15 The proposal represents marked improvements to the hard and soft landscaping on-site and in its immediate environs and would result in a greener open space provision which is considered acceptable for this location, housing size/population, and typology. The proposal satisfies the above planning policies in this regard

6.7 Housing Mix, Tenure and Quality of Accommodation

- 6.7.1 London Plan (2021) Policy H10 states that schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, it advises that regard is made to several factors. These include robust evidence of local need, the requirement to deliver mixed and inclusive neighbourhoods, the nature and location of the site (with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity), and the aim to optimise housing potential on sites.
- 6.7.2 The 2021 London Plan states that boroughs may wish to prioritise meeting the most urgent needs earlier in the Plan period, which may mean prioritising low cost rented units of particular sizes.
- 6.7.3 The Local Plan Policy SP2 and DPD Policy DM11 of the Council's Development Management DPD adopt a similar approach.
- 6.7.4 DPD Policy DM11 states that the Council will not support proposals which result in an over concentration of 1 or 2 bed units overall unless they are part of larger developments or located within neighbourhoods where such provision would deliver a better mix of unit sizes.
- 6.7.5 The proposed development will provide 14 one-bedroom (incl. 2 wheelchair accessible homes) for supported living accommodation with associated facilities including a support office and amenities. The new homes will cater for adults with mental health needs, who are ready to step-down from intensive/high-cost residential placements into a more independent lifestyle.
- 6.7.6 The proposed development forms part of the Council's Housing Delivery Programme which seeks to optimise the provision of affordable accommodation for Council rent to meet local need. The Programme is part funded by the GLA and is informed by the Local Plan and the Council's Housing Strategy. It aims to address the Council's housing waiting list and specialist housing need through the provision of a wide range of housing typologies across all the sites identified, manage issues relating to the over and under occupation of the existing housing stock and ensure the effective use of public assets and funding.
- 6.7.7 The site has been chosen for this specific type of accommodation having regard to its size, accessible and established residential location and the nature and condition of the existing property. The quiet, backland nature of the site and its single point of access provides an appropriate location for adults adjusting to living directly in the community. It

also provides good access to public transport and local shopping and recreational facilities. As such, given the nature of the proposal being high-quality 'supported living', the inclusion of one-bed units is considered acceptable in this instance as it meets the identified need, the mix of units is therefore considered acceptable.

Quality of Accommodation

- 6.7.8 The Nationally Described Space Standards set out the minimum space requirements for new housing. The London Plan (2021) standards are consistent with these. London Plan Policy D6 requires housing developments to be of high quality design, providing comfortable and functional layouts, benefiting from sufficient daylight and sunlight, maximising the provision of dual aspect units and providing adequate and easily accessible storage space as well as outdoor amenity space. It provides qualitative design aspects that should be addressed in housing developments.
- 6.7.9 The Mayor of London's Housing SPG seeks to ensure that the layout and design of residential and mixed-use development should ensure a coherent, legible, inclusive and secure environment is achieved. Indoor and outdoor space/accommodation standards.

Indoor and outdoor space/accommodation standards

- 6.7.10 All dwellings achieve or exceed minimum space standards including bedroom sizes, gross internal area, and outside amenity space standards (balconies and terraces). All dwellings have a minimum floor to ceiling height of 2.5m. In addition, all dwellings are well laid out to provide useable living spaces and sufficient internal storage space.
- 6.7.11 Daylight and sunlight studies have been undertaken. The study is based on the numerical tests laid down in the relevant Building Research Establishment (BRE) guidance. It concludes that all dwellings, (which are all at least dual aspect) including external space receive good levels of sunlight/daylight. The proposal would result in an acceptable standard of accommodation for future occupiers in this regard.

All dwellings are considered to be well laid out with sufficient space for storage to provide useable living spaces to meet modern living arrangements.

Accessible Housing

- 6.7.12 London Plan Policy D5 seeks to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children. To achieve this, it requires that 10% of new housing is wheelchair accessible and that the remaining 90% is easily adaptable for residents who are wheelchair users. Local Plan Policy SP2 is consistent with this as is DPD Policy DM2 which requires new developments to be designed so that they can be used safely, easily and with dignity by all.
- 6.7.13 All dwellings achieve compliance with Building Regulations M4 (2) and over 10% of units achieve M4 (3) compliance. Two accessible car parking spaces are provided. The proposal is therefore acceptable in this regard.

Noise – future occupiers

- 6.7.14 The NPPF states, in paragraph 180, that new development should mitigate and reduce to minimum potential adverse impacts resulting from noise and avoid noise giving rise to significant adverse impacts on health and the quality of life. London Plan Policy D14 specifically concerns noise and requires development proposals to reduce, manage and mitigate noise impacts. Local Plan Policy DM23 states that the Council will seek to ensure that new noise sensitive development is located away from existing or planned sources of noise pollution. Proposals for potentially noisy development must suitably demonstrate that measures will be implemented to mitigate its impact.
- 6.7.15 The application is accompanied by an External Noise Assessment, which concludes that appropriate internal and external noise levels can be achieved and that the site is therefore suitable for residential development.
- 6.7.16 The main noise generator in respect to the site is road traffic noise on surrounding roads. The proposed courtyard and amenity space will be acoustically screened on all sides by the development building envelope, and the neighbouring houses, with no direct line of sight to any road. This is expected to further reduce external noise levels in these areas, and it is therefore considered that the external noise level guidelines will be achieved in all external amenity areas.
- 6.7.17 In accordance with the recommendations of the Noise Assessment, the development incorporates double glazing and background ventilation options.
- 6.7.18 In summary, the standards of accommodation and living conditions proposed are very high and while some parts of the building are more noise sensitive than others, the acoustic performance would be good. For a scheme in this location with its site constraints, the proposal represents very good quality units and living conditions which satisfy the above policies.

6.8 Parking and highway safety/ waste recycling and servicing

- 6.8.1 Paragraph 110 of the NPPF (2021) states that in assessing development proposals, decision makers should ensure that appropriate opportunities to promote sustainable transport modes have been taken up, given the type of development and its location. It prioritises pedestrian and cycle movements, followed by access to public transport, including facilities to encourage this.
- 6.8.2 The London Plan (2021) Policy T1 sets out the Mayor's strategic target for 80% of all trips in London to be made by foot, cycle or public transport by 2041. This policy also promotes development that makes the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport. Policy T6 sets out cycle parking requirements for developments, including minimum standards. T7 concerns car parking and sets out that 'car-free' development should be the starting point for all development proposals in places that are well-connected by public transport. Policy T6.1 sets out requirements for car parking spaces that are proposed.
- 6.8.3 Local Plan Policy SP7 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip

generating developments in locations with good access to public transport. This approach is continued in DM DPD Policies DM31, DM32 and DM33.

- 6.8.4 DM32 is particularly relevant and states that the Council will support proposals for new development with limited or no on-site parking where there are alternative and accessible means of transport available, public transport accessibility is 3-4 as defined in the Public Transport Accessibility Index, a Controlled Parking Zone (CPZ) exists or will be extended prior to the occupation of the development, parking is provided for disabled people; and parking is designated for occupiers of developments specified as car capped.

Car Parking

- 6.8.5 The proposed development demolishes eight 2-bedroom bungalows with their accompanying 9 parking spaces and replaces them with 14 one-bedroom units, including 2 fully wheelchair accessible homes. A site office is proposed and will have 4 to 6 people present on a daily basis. The development proposals would be accompanied by the provision of 2 wheelchair-accessible parking spaces.
- 6.8.6 The existing 9 car parking spaces would be reduced to only 2 wheelchair-accessible spaces. LBH Transport Planning has reviewed the proposal and notes that the existing spaces serving the existing development would not need to be re-provided, either on site or displaced to local on-street locations. Swept path analysis demonstrates that both accessible spaces can be accessed and egressed easily within the site.

Car Free

- 6.8.7 A 'car-free' development is proposed meaning only wheelchair accessible parking is provided on site and permits would not be allocated to the new properties for on street parking. Due to the site's high PTAL (5 - denoting very good connectivity), the site's location within a CPZ and the on-site provision of accessible parking in line with London Plan (2021) standards, the proposed development would qualify for a car-free status, in accordance with Policy DM32: Parking of the Development Management DPD.
- 6.8.8 Accordingly, the LPA would restrict future occupiers from receiving on-street resident parking permits. The Council would use legal agreements (or equivalent) to secure this and require the applicant to advise all occupiers of the car-capped status of the proposed development.

Staff Parking

- 6.8.9 Staff driving to and from the site would be able to park within the Sandlings Estate, where the roads are controlled by Homes for Haringey and CPZ permits do not apply. The parking stress survey results show that the average overnight stress within the local CPZ was around 73%. The existing stress level within the local CPZ is below the typical threshold of 85% beyond which parking starts becoming problematic. As such, no significant, additional parking stress is forecast, despite the loss of on-site parking space.

Trips Forecast

- 6.8.10 Transportation officers have advised that as there would be far less parking on site than existing, the predicted uplift in car trips is likely to be less than predicted (+6 car trips, +10 vehicle occupant trips). Irrespective of a revised car mode share to take account of the future lower provision, the impact of car trips is forecast to be low.

Access Arrangements

- 6.8.11 Vehicle and pedestrian access would be retained from Russell Avenue with delivery and servicing activity undertaken from both Russell Avenue and the Sandlings, and waste collection from the Sandlings only. There will be additional pedestrian access points from the Sandlings.

Cycle Parking (residential)

- 6.8.12 It is proposed to provide a total of 21 long-stay and 2 short-stay residential cycle parking spaces, which is in line with the London Plan (2021) minimum residential cycle parking standards.

Cycle Parking (Office)

- 6.8.13 With a floor area of 51.5sqm, a minimum of 2 long-stay and 2 short-stay spaces have been provided, in line with London Plan Policy T5.A Cycling which states that 'Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.'
- 6.8.14 LBH Transport Planning has requested that a condition be added securing provision of full details showing the cycling parking systems to be used, access to them, the layout and space around the cycle parking spaces with all dimensions marked up on plans. This has been added accordingly.

Waste and recycling

- 6.8.15 London Plan Policy D6 requires suitable waste and recycling storage facilities in all new developments, Local Plan Policy SP6 Waste and Recycling and DPD Policy DM4 require development proposals to make adequate provision for waste and recycling storage and collection.
- 6.8.16 Servicing of the waste and recycling will be provided via the Sandlings road, which is accessible for service vehicles. LBH's Interim Recycling Manager has reviewed the proposal and confirmed this meets the requirements expected for this scale of development.
- 6.8.17 The applicant has clarified that Fobs and digi-locks will be provided to residents to secure the proposed bin stores and 2x600 litre compost bins have been added to the landscape plan for the communal garden to allow for management of green waste via recycling and/or composting.
- 6.8.18 As such, the proposal is considered acceptable, in accordance with the above policies.

6.9 Sustainable Energy and Climate Change

- 6.9.1 The proposed development has sought to adopt a progressive approach in relation to sustainability and energy to ensure that the most viable and effective solution is delivered to reduce carbon emissions. The NPPF requires development to contribute to the transition to a low carbon future, reduce energy consumption and contribute to and conserve the natural environment.
- 6.9.2 London Plan Policy SI 2 - Minimising greenhouse gas emissions, states that major developments should be zero carbon, and in meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Local Plan Policy SP4 requires all new developments to introduce measures that reduce energy use and carbon emissions. Residential development is required to achieve a reduction in CO2 emissions. Local Plan Policy SP11 requires all development to adopt sustainable design and construction techniques to minimise impacts on climate change and natural resources.
- 6.9.3 DPD Policy DM1 states that the Council will support design-led proposals that incorporate sustainable design and construction principles and Policy DM21 expects new development to consider and implement sustainable design, layout and construction techniques.
- 6.9.4 An energy statement was submitted with the application, which demonstrates that consideration has been given to sustainable design principles throughout the design of the proposed scheme. The building is designed to minimise its environmental impact through various means and minimise carbon dioxide emissions in line with the prescribed energy hierarchy. The scheme achieves a total carbon emissions saving of 101% compared to the Part L: 2013 of the Building Regulations. This meets the Mayor of London's definition of a zero carbon building through on-site means alone. The use of cross laminated timber frame will reduce the embodied carbon compared to a traditional concrete frame. The development employs an efficient building fabric, including well insulated walls and highly efficient glazing and incorporates air source heat pumps and PV Panels to maximise carbon savings.
- 6.9.5 Green roofs and sustainable drainage (SUDS) further contribute to the sustainable nature and biodiversity of the site, while low-energy appliances and water conserving sanitary ware contribute to energy efficiency in the new homes.
- 6.9.6 An Overheating Assessment has been undertaken to minimise the risk of overheating within the proposed development and to reduce reliance on air conditioning. In line with the Cooling Hierarchy outlined within the London Plan, a number of measures to minimise the risk of heating have been employed within the proposed development.
- 6.9.7 These measures include the provision of fenestration that minimises solar heat gain whilst optimising daylight penetration and the specification of energy efficient and low-temperature systems. The assessment shows that overheating risk has been mitigated for the current (2020s) time frame and baseline DSY1 weather file and can be mitigated to a certain extent for warmer weather in the future through the use of internal blinds.
- 6.9.8 Mechanical cooling will be required for ground floor bedrooms, as the ground floor windows cannot be modelled open at night due to the restrictions imposed by the

forthcoming Building Regulations Part O. The use of mechanical cooling in the 5 ground floor bedrooms has been found to provide sufficient mitigation to meet CIBSE criteria for all weather scenarios tested without excessively increasing carbon dioxide emissions.

6.9.9 The Council's Carbon Management Team has been consulted on the application. In summary, it supports the scheme based on its 101% carbon reductions on site. It has requested further information which can be dealt with by conditions. No carbon shortfall of regulated operational emissions remains, therefore no carbon offset contribution is required. In the event that the construction on site does not achieve this, a carbon offset contribution of £2,850 per tCO₂ would be required.

6.9.10 Subject to these, the proposal represents a zero carbon scheme which significantly exceeds the Local Plan Policy requirements of a 35% reduction and therefore represents an exemplar scheme which not only satisfies, but exceeds, the requirements of relevant planning policy in this regard.

6.10 Crime Prevention

6.10.1 London Plan Policy D3 states that development proposals should achieve safe, secure and inclusive environments. Local Plan Policy requires all development to incorporate solutions to reduce crime and the fear of crime by promoting social inclusion, creating well-connected and high-quality public realm that is easy and safe to use and apply 'Secured by Design' and Safer Places principles. DPD Policy DM2 seeks to ensure that new developments have regard to the principles set out in 'Secured by Design'.

6.10.2 The design has been influenced by the 'Secure by Design' (SBD) principles and in doing so seeks to design out crime. SBD principles have been considered and incorporated following early engagement with the Metropolitan Police.

6.10.3 The scheme is designed to achieve a minimum standard Secured by Design Silver Award accreditation. With additional detail provided at the technical stage, it is anticipated that a Gold Award accreditation could be achieved

6.10.4 The Metropolitan Police Designing Out Crime Officer (DOCO) was consulted on this final design. They recommend planning condition(s) to secure accreditation prior to commencement. Subject to SBD measures by condition, Officers consider the proposal would create a safe secure environment, satisfy the planning policies requirements and would be acceptable in this regard.

6.11 Flood Risk and Drainage

6.11.1 Local Plan Policy SP5 and DPD Policy DM24 seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage.

6.11.2 The applicant has submitted a Flood Risk Assessment and Sustainable Drainage Statement. These have been reviewed by LBH Flood & Water Management who has requested that additional information be submitted. As condition requiring this prior to above ground works has been added accordingly.

6.12 Air Quality

- 6.12.1 DPD Policy DM23 requires all development to consider air quality and improve or mitigate the impact on air quality in the borough and users of the development. An Air Quality Assessment ('AQA') was prepared to support the planning application and concluded that the site is suitable for residential use and that the proposed development would not expose existing residents or future occupants to unacceptable air quality. It also highlighted that the air quality impacts from the proposed development during its construction phase would not be significant and that in air quality terms it would not conflict with national or local planning policies.
- 6.12.2 Officers have reviewed this assessment. The proposed development is considered to be air quality neutral. In-built mitigation measures including green infrastructure, solar panels, ASHP and cycle storage boost the green credentials of the proposed development. It can therefore be concluded that the proposed development is not considered to conflict with national, regional and local planning guidance.
- 6.12.3 Officers acknowledge that while concerns raised about construction works are noted, these are temporary and can be mitigated through the requirements of the construction logistics plan to include air quality control measures such as dust suppression. The proposal is not considered an air quality risk or harm to nearby residents, or future occupiers. The proposal is acceptable in this regard.

6.13 Land Contamination

- 6.13.1 DPD Policy DM23 (Part G) requires proposals to demonstrate that any risks associated with land contamination can be adequately addressed to make the development safe.
- 6.13.2 A Phase 1 Land Contamination Assessment has been carried out and accompanies the application submission. The Assessment concludes from a review of the relevant findings, that the proposed site is likely to be suitable for a residential development, subject to further detailed investigation and any subsequent recommended remedial works that may be required for the proposed end use.
- 6.13.3 Officers consulted the Council's Environmental Health/ Pollution service on this proposal. Their Officers reviewed the scheme in detail and agree that the proposal is acceptable subject to conditions.
- 6.13.5 Subject to appropriate conditions to deal with land-contamination risk, the proposal would satisfy the above planning policy requirements and is acceptable in this regard.

6.14 Trees

- 6.14.1 DM Policy (2017) DM1 'Delivering High Quality Design' states that the Council will expect development proposals to respond to trees on and close to the site.
- 6.14.2 There are 17 early/semi mature and mature trees located around the boundary of the site, with a small number located within the boundary. Most trees are category C (low quality) with three trees identified as category B (moderate quality). There are no category A (High Quality) trees in or around the site.
- 6.14.3 The submitted Arboriculture Assessment identifies two trees for removal; Tree T5 (Italian Alder), and T12 (Sycamore). Both trees are within the boundary of Barbara Hucklesbury

Close. T5 will require removal to facilitate the development and is the sole tree required to facilitate the proposal. The report recommends that tree T12, is removed on the basis of its poor form. Both trees are identified as a category C (low or limited impact) of average condition, therefore their removal is considered acceptable.

- 6.14.4 The higher proportion of low category trees reflects the small size and restricted amenity value of the trees surveyed. The category C trees make some contribution to the canopy cover and screening around the site, but as individuals they are of restricted amenity value and considered to be of medium term potential.

The Sandlings

- 6.14.5 The mature trees within the line along the boundary with The Sandlings Estate form a significant group of trees providing screening between properties and a sense of scale. These trees have been categorised as category B. These are to be retained.
- 6.14.6 The footprint of the proposed new building encroaches into the circular representation of the RPAs of trees 2 and 3, and 6 to 10 that form a line within the boundary of The Sandlings Estate. It is proposed to construct the foundations on piles with the ground beams located above the level of the highest roots, so the proposed development is unlikely to impact significantly on the retained trees. Trees 14 to 17 are within the neighbouring rear gardens and will be retained.
- 6.14.7 All retained trees will be protected in accordance with BS 5837:2012 specifications throughout the development. This report includes guidance on tree protection measures and providing these are adhered to, there will be no adverse impact on the long-term potential on the retained trees.
- 6.14.8 Notwithstanding the above assurances, the report sets out a series of recommendations prior and during construction that will ensure impacts to trees are minimised. Tree protection methods are secured via condition. Nine new semi-mature trees new trees will be planted across the site.
- 6.14.9 The Arboricultural Officer has been consulted and raises no objections, subject to conditions. In conclusion, the proposal (with conditions) ensures the protection of existing species, with a low or limited impact on the existing trees and is considered acceptable.

6.15 Conclusion

- The proposal provides high quality specialist accommodation in the form of supported living (Use Class C2) comprising 14 one-bedroom homes, a support office and communal garden, appropriate support and management will be provided. These homes will be for council rent and meet an identified need for adults with mental health needs, who are ready for a more independent lifestyle.
- Planning policy recognises the important role and contribution that small sites such as this play in meeting an identified need for new housing in the borough. The site is within an established neighbourhood with good access to public transport and existing neighbourhood facilities, where planning policy expects additional housing at a greater density than existing. This is subject to a design-led approach to the development of the

site, which was carried out here to capitalise on the opportunities and location of the site to bring forward new homes. In land-use terms, the proposal is strongly supported in principle.

- The development would be of a high-quality design which responds appropriately to the local context, particularly the neighbouring conservation area.
- The proposal provides a comprehensive hard and soft landscaping scheme.
- Nine new semi-mature trees new trees will be planted across the site.
- The size, mix, tenure, and quality of accommodation are acceptable and either meet or exceed relevant planning policy standards. All flats have external amenity space.
- The proposal has been designed to avoid any material harm to neighbouring amenity in terms of a loss of sunlight and daylight, outlook, or privacy, in terms of excessive noise, light or air pollution.
- The proposed development is car free (except for 2 wheelchair-accessible spaces) and high-quality storage for cycles is provided. The site's location is accessible in terms of public transport routes and the scheme is also supported by sustainable transport initiatives.
- High performance energy saving measures form part of the proposal, which would also include insulation measures that would safeguard the amenity of future occupiers from excessive noise levels.
- The proposal would have a negligible impact on the historic built environment, which is considered acceptable when it is weighted against the public benefits of the proposal.

All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION.

7.0 COMMUNITY INFRASTRUCTURE LEVY (CIL)

Based on the information given on the plans, the Mayoral CIL charge will be £34,121.50 (565.3 sqm x £60.36) and the Haringey CIL charge will be £129,7722.40 (565.3 sqm x £229.21). This will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the RICS CIL Index. An informative will be attached advising the applicant of this charge. It is expected that the applicant will be eligible to claim social housing relief.

8.0 RECOMMENDATION

GRANT PERMISSION subject to conditions in Appendix 1.

APPENDIX 1.

Subject to the following condition(s)

1. The development hereby authorised must be begun not later than the expiration of 3 years from the date of this permission, failing which the permission shall be of no effect.

Reason: This condition is imposed by virtue of the provisions of the Planning & Compulsory Purchase Act 2004 and to prevent the accumulation of unimplemented planning permissions.

2. The development hereby authorised shall be carried out in accordance with the following approved plans and specifications:

Design and Access Statement 1 of 2 P2, Design and Access Statement 2 of 2 P2, Daylight and Sunlight Report (Within Development) rev 2, Daylight and Sunlight Report (Neighbouring Properties) (Jan 2022), Energy Sustainability and Overheating Statement rev 3, Air Quality Assessment (November 2021), Arboricultural Impact Assessment Rev Feb 2022, Biodiversity Assessment Report May 2021, Detailed Fire Strategy (February 2022), External Noise Assessment (November 2021), Flood Risk Assessment (February 2021), GLA Carbon Emission Reporting Spreadsheet, Landscape Statement (Feb 2022), Outline Construction Logistics Plan CLP (Feb 2022), Phase 1 Land Contamination Assessment (February 2022), SUDs Strategy Rev V4, Transport Assessment (Jan 2022), Urban Greening Factor, Computer visuals, Planning statement (March 2022), Statement of Community Involvement (March 2022), 181-004-EX-LOC Existing location plan P1, 181-005-EX-SIT Existing site plan P1, 181-006-EX-ELE Existing building elevations AA and BB P1, 181-007-EX-SEC Existing section CC P1, 181-008-GA-LOC Proposed location plan P1, 181-009-GA-SIT Proposed site plan P2, 181-010-GA-PLN Proposed ground floor plan P2, 181-011-GA-PLN Proposed first floor plan P1, 181-012-GA-PLN Proposed second floor plan P1, 181-013-GA-PLN Proposed indicative roof plan P2, 181-014-GA-ELE Proposed elevations AA and BB P2, 181-015-GA-ELE Proposed elevations CC and DD P2, 181-016-GA-SEC Proposed section EE P1, 181-017-GA-ELE Proposed ground floor elevations FF, GG and typical frontages P2, 511-LP-GF-GA-001 REV P2, 511-LP-GF-GA-002 REV P2, 511-LP-GF-GA-005 REV P3, 511-LP-GF-GA-010 REV P1, 511-LP-GF-GA-020 REV P2, 511-LP-GF-GA-030 REV P2, 511-LP-GF-SEC-101 REV P1, 511-LP-GF-SEC-102 REV P1

Reason: In order to avoid doubt and in the interests of good planning.

Materials and design detail

3. Prior to the commencement of above ground works detailed drawings (including sections) to a scale of 1:20 to confirm the detailed design and materials of the:
 - a) Detailed elevational treatment;
 - b) Detailing of roof and parapet treatment;
 - c) Windows and doors (including plan, elevation and section drawings indicating jamb, head, cill, reveal and surrounds of all external windows and doors at a scale of 1:10), which shall include a recess of at least 115mm;
 - d) Details of entrances and porches which shall include a recess of at least 115mm;

- e) Details and locations of down pipes, rainwater pipes or foul pipes and all external vents;
- f) Details of balustrading;
- g) Facing brickwork: sample panels of proposed brickwork to be used showing the colour, texture, pointing, bond, mortar, and brickwork detailing shall be provided;
- h) Details of cycle, refuse enclosures and plant room; and
- i) Any other external materials to be used;

together with a full schedule of the exact product references for all materials shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out solely in accordance with the approved details.

Reason: To safeguard and enhance the visual amenities of the locality in compliance with Policies DM1, DM8 and DM9 of the Development Management Development Plan Document 2017.

Energy Strategy

4. The development hereby approved shall be constructed in accordance with the Energy, Sustainability & Overheating Statement prepared by Savills Earth (dated June 2022, Rev 03) delivering a minimum 101% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, air source heat pumps (ASHPs), a minimum 43.2 kWp solar photovoltaic (PV) array, and approved overheating mitigation measures.

(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:

- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy, and if it doesn't, to calculate the carbon offset contribution at £2,850 per tCO₂;
- Confirmation of the necessary fabric efficiencies to achieve a minimum 10% (residential) and 15% (non-residential) reduction in SAP2012 carbon factors, including details to reduce thermal bridging;
- A revised Overheating Strategy where the design has been altered;
- Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;
- Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the units;
- 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);
- A metering strategy.

The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.

(b) Within six months of first occupation, as-built SAP and BRUKL calculations, air tightness testing certificates, evidence that the solar PV and ASHPs installations 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.

(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.

(d) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the approved Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant involvement to evidence this training and engagement.

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.

Overheating Building User Guide

5. Prior to occupation, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems. The Building User Guide will be issued to residential occupants upon first occupation.

Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.

Living roofs and walls

6. (a) Prior to the commencement of development, details of the living roofs and living wall must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:
 - i) A roof plan identifying where the living roofs will be located and a ground floor plan identifying where the living walls will be rooted in the ground, if any;
 - ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);

- iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate
 - iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays;
 - v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with roof ball of plugs 25m³) 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);
 - vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and
 - vii) Management and maintenance plan, including frequency of watering arrangements.
- (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 roofs has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

Biodiversity

7. (a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.
- (b) Prior to the occupation of development, photographic evidence and a post development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.

Development shall accord with the details as approved and retained for the lifetime of the development.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change.

In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

Cycle Parking

8. No development shall take place until further details of the type and location of secure and covered cycle parking facilities have been submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied until a minimum of 27 cycle parking spaces for users of the development, have been installed in accordance with the approved details. Such spaces shall be retained thereafter for this use only.

Reason: To promote sustainable modes of transport in accordance with policy T5 of the London Plan 2021 and Policy SP7 of the Haringey Local Plan 2017.

Travel Plan

9. No development shall take place until details of a travel plan showing how patrons will access the site by more sustainable transport modes has been submitted to and approved in writing by the local planning authority. The plan must show measures that will be used to promote more sustainable modes of transport and how such measures will be managed once the development has been first implemented. The approved travel plan shall be implemented prior to first occupation of the development hereby permitted.

Reason: To promote sustainable transport and to reduce the potential for additional on street parking stress as a result of the development, consistent with Policies SP0, SP4 and SP7 of the Haringey Local Plan 2017.

Construction Management Plan

10. No development shall take place, including any works of demolition, until a Method of Construction Statement, to include details of:
 - a) parking and management of vehicles of site personnel, operatives and visitors
 - b) loading and unloading of plant and materials
 - c) storage of plant and materials
 - d) programme of works (including measures for traffic management)
 - e) provision of boundary hoarding behind any visibility zones
 - f) wheel washing facilities:

have been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented and retained during the demolition and construction period.

Reasons: To ensure there are no adverse impacts on the free flow of traffic on local roads and to safeguard the amenities of the area consistent with Policies T4, T7 and D14 of the London Plan 2021, Policies SP0 of the Haringey Local Plan 2017 and with Policy DM1 of The Development Management DPD 2017.

Thames Water

11. No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.

Land Contamination

12. Before development commences other than for investigative work:
- Using the information already submitted in Phase I Land Contamination Assessment report with reference EES 21. 239.1 prepared by Ecologia Environmental Solutions Ltd dated February 2022, an intrusive/ground investigation, assessment and modelling of identified contaminants set in the context of the proposed development shall be conducted 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.
 - 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.
 - Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and;
 - A report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

Unexpected Contamination

13. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved

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

Demolition/Construction Environmental Management Plans (Pollution)

14. a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst
b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.

The following applies to both Parts a and b above:

- a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).
- b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:
 - i. A construction method statement which identifies the stages and details how works will be undertaken;
 - ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;
 - iii. Details of plant and machinery to be used during demolition/construction works;
 - iv. Details of an Unexploded Ordnance Survey;
 - v. Details of the waste management strategy;
 - vi. Details of community engagement arrangements;
 - vii. Details of any acoustic hoarding;
 - viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution

Prevention Plan (in accordance with Environment Agency guidance);

- ix. Details of external lighting; and,
- x. Details of any other standard environmental management and control measures to be implemented.

c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:

- i. Monitoring and joint working arrangements, where appropriate;
 - ii. Site access and car parking arrangements;
 - iii. Delivery booking systems;
 - iv. Agreed routes to/from the Plot;
 - v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and
 - vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and
 - vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.
- d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:

- i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;
- ii. Details confirming the Plot has been registered at <http://nrmm.london>;
- iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;
- iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);
- v. A Dust Risk Assessment for the works; and
- vi. Lorry Parking, in joint arrangement where appropriate.

The development shall be carried out in accordance with the approved details as well as on the applicant submitted proposed mitigation in the Air Quality Report Appendix C whilst we look forward to agreeing real monitoring locations with the applicant for the demolition phase.

Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.

Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality."

Waste

- 15. No development shall take place until a detailed scheme for the provision of refuse and waste storage and recycling facilities has been submitted to and approved in writing by the Local Planning Authority. Such a scheme as approved shall be implemented and permanently retained thereafter.

Reason: In order to protect the amenities of the locality and to comply with Policy DM4 of The Development Management DPD 2017 and Policy D6 of the London Plan 2021.

Secured by Design

- 16. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development. The development shall only be carried out in accordance with the approved details.

Reason: To ensure safe and secure development and reduce crime

- 17. Prior to the first occupation of each building or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.

Reason: To ensure safe and secure development and reduce crime

Trees

18. No development shall start until all those trees to be retained, as indicated on the approved drawings, have been protected by secure, stout, exclusion fencing erected at a minimum distance equivalent to the branch spread of the trees and in accordance with BS 3998:2010 and to a suitable height. Any works connected with the approved scheme within the branch spread of the trees shall be by hand only. No storage of materials, supplies or plant machinery shall be stored, parked, or allowed access beneath the branch spread of the trees or within the exclusion fencing.

Reason: In order to ensure the safety and wellbeing of the trees on the site during constructional works that are to remain after building works are completed.

Landscaping

19. Prior to the first occupation of the development hereby approved full details of both hard and soft landscape works shall be submitted to and approved in writing by the Local Planning Authority, and these works shall thereafter be carried out as approved. Details shall include information regarding, as appropriate:
- a) Proposed finished levels or contours;
 - b) Means of enclosure;
 - c) Hard surfacing materials including details of tonal contrasts between pedestrian, cycle and vehicle priority areas;
 - d) Minor artefacts and structures (e.g. Furniture, play equipment, refuse or other storage units, wayfinding measures, signs, lighting etc.); and

Soft landscape works shall be supported by:

- e) Planting plans including a CAVAT assessment of existing and proposed trees;
- f) Written specifications (including details of cultivation and other operations associated with plant and/or grass establishment);
- g) Schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; and
- h) Implementation and long-term management programmes (including a five-year irrigation plan for all new trees).

The soft landscaping scheme shall include detailed drawings of:

- i) Existing trees to be retained;
- j) Existing trees which will require thinning, pruning, pollarding or lopping as a result of this consent; and
- k) Any new trees and shrubs, including street trees, to be planted together with a schedule of species which must include no less than nine new semi-mature trees
- l) Annotated plans and details on what measures will be delivered to the external amenity areas that will help adapt the development and its occupants to the impacts of climate change through more frequent and extreme weather events and more prolonged droughts;
- m) detailed final urban greening factor plan showing that a factor of greater than 0.4 has been achieved.

The approved scheme of planting, seeding or turfing comprised in the approved details of landscaping shall be carried out and implemented in strict accordance with the approved details in the first planting and seeding season following the occupation of the

building or the completion of development (whichever is sooner). Any trees or plants, either existing or proposed, which, within a period of five years from the completion of the development die, are removed, become damaged or diseased shall be replaced in the next planting season with a similar size and species. The landscaping scheme, once implemented, is to be retained thereafter.

Reason: In order for the Local Planning Authority to assess the acceptability of any landscaping scheme, thereby ensuring a satisfactory setting for the proposed development in the interests of the visual amenity of the area consistent with Policy DM1 of the Development Management DPD 2017 and Policy SP11 of the Local Plan 2017

Drainage

20. No above ground works shall take place until details for drainage measures incorporating sustainable urban drainage systems (SuDS) methods have been submitted to and approved in writing by the Local Planning Authority. The details shall include management maintenance schedules, including details of who is responsible for maintenance, for each SuDS element of the development, and shall be implemented in full prior to occupation of the approved development.

Reason: To manage and mitigate flood risk impacts in accordance with Policy SI13 of the London Plan 2021, Policies SP0 and SP5 of the Haringey Local Plan 2017 and Policy DM24 of The Development Management DPD 2017.

Adults Social Care and NHS services Management Plan

21. A Management Plan that shall be submitted to and approved in writing by the Local Planning Authority prior to occupation. The Management Plan must include the following: - Procedures for addressing complaints and concerns from neighbouring residents; - Details of the establishment of a Community Steering Group for the Barbara Hucklesbury Close Area; - A Locality & Community Management Plan to support service users and other local residents to feel welcome, safe, and connected; - Measures to minimise any noise and disturbance from the development; - Further details of the roles, responsibilities and scheduling of on-site staffing - Details of the referral process and the assessment of suitability for occupants; and - Details of the support services available to residents.

Reason: In order to ensure the public benefits of the proposal are realised for the lifetime of the development and to prevent the accommodation being used as other forms of housing or causing undue harm to the amenity of neighbouring occupiers.

Part M

23. All residential units on site shall be built to Part M4(2) 'accessible and adaptable dwellings' of the Building Regulations 2013 (as amended), and at least 10% (eight dwellings) shall be wheelchair accessible or easily adaptable for wheelchair use in accordance with Part M4(3) of the same Regulations, unless otherwise agreed in writing in advance with the Local Planning Authority.

Reason: To ensure that the proposed development meets the Council's standards for the provision of wheelchair accessible dwellings in accordance with Local Plan 2017 Policy SP2 and London Plan Policy D7.

C2 Use Class

24. Notwithstanding any provisions to the contrary, the 14 residential units within the development hereby approved shall be provided for rent at Council social-rent levels within the C2 use class, and for no other tenure or use unless otherwise agreed in writing in advance by the Local Planning Authority.

Reason: To define the scope of this permission in relation to the provision of supported living accommodation.

Energy

25. The approved development shall not be implemented unless and until verified estimates of the 'Be Seen' energy performance indicators have been submitted to the GLA via their online portal and evidence of this, plus a metering strategy, has been submitted to the Local Planning Authority for its written approval.

Reason: To contribute towards sustainable development, energy reduction measures and climate change mitigation.

Residents Survey

26. No later than 12 months after the first occupation of the development hereby approved a Resident Satisfaction Survey shall be undertaken and the results reported to the Council's Housing Engagement Manager for review.

Reason: To ensure the quality of the housing design and layout in accordance with Policy DM12 of the Development Management DPD 2017.

Informatives:

INFORMATIVE : In dealing with this application, Haringey Council has implemented the requirements of the National Planning Policy Framework and of the Town and Country Planning (Development Management Procedure) (England) (Amendment No.2) Order 2012 to foster the delivery of sustainable development in a positive and proactive manner.

INFORMATIVE : CIL

Based on the information given on the plans, the Mayoral CIL charge will be £34,121.50 (565.3 sqm x £60.36) and the Haringey CIL charge will be £129,772.40 (565.3 sqm x £229.21). This will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index.

INFORMATIVE :

Hours of Construction Work

Hours of Construction Work: The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours:-

- 8.00am - 6.00pm Monday to Friday
- 8.00am - 1.00pm Saturday
- and not at all on Sundays and Bank Holidays.

INFORMATIVE : Party Wall Act: The applicant's attention is drawn to the Party Wall Act 1996 which sets out requirements for notice to be given to relevant adjoining owners of intended works on a shared wall, on a boundary or if excavations are to be carried out near a neighbouring building.

Street numbering

INFORMATIVE : The new development will require numbering. The applicant should contact the Local Land Charges at least six weeks before the development is occupied (tel. 020 8489 5573) to arrange for the allocation of a suitable address.

The London Fire Brigade

INFORMATIVE : The London Fire Brigade strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers, and can reduce the risk to life. The Brigade opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupier. .

INFORMATIVE :

Thames Water

With regards to surface water drainage, it is the responsibility of a developer to make proper provision for drainage to ground, water course, or a suitable sewer. In respect of

surface water, it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

Thames Water

INFORMATIVE: Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Water's pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Thames Water

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

Thames Water

INFORMATIVE: Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses

Pollution

INFORMATIVE: 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.

Secured by Design

INFORMATIVE: The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.

Appendix 2 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Adult and Health Services	<p>This development will respond to the unmet need for specialist accommodation for people affected by poor mental health, who require medium-term support to live independently. At the moment, upwards of 60% of people rough sleeping experience mental health difficulties, we also know that housing and the risk of homelessness are key factors in poor mental health, in delayed discharges from inpatient mental health wards and in recovery from traumatic experiences such as domestic abuse, war and conflict and modern slavery. As such, if approved, this housing development will make a significant positive contribution to the lives of a variety of vulnerable groups in the borough by providing specialist and tailored accommodation with support.</p>	Noted.
Transportation	<p>Transport Assessment</p> <p><u>Development Proposals</u></p> <p>The proposed development is for the demolition of 8 existing 2-bedroom bungalows with 9 parking spaces and for the construction of 14 one-bedroom units, of which 2 would be fully wheelchair-accessible. A site office would also be accommodated and have 4 to 6 people on a daily basis. The development proposals would be accompanied by the provision of 2 wheelchair-accessible parking spaces.</p> <p><u>Proposed Access Arrangements</u></p> <p>Vehicle and pedestrian access would be retained from Russell Avenue with delivery and servicing activity undertaken from both Russell Avenue and the Sandlings, and waste collection from the Sandlings only. There will be additional pedestrian access points from the Sandlings.</p> <p><u>Active Travel Zone Assessment</u></p> <p>A total of 3 routes, south to Turnpike Lane station, north to Wood Green station and east to Westbury Avenue and Lordship Lane, have been assessed as part of the Active Travel Zone (ATZ) assessment. Although the assessment has identified the need for additional dropped kerbs and tactile paving slabs at a number of locations, it is considered that the level of footway</p>	Noted conditions/ Planning Obligations attached.

Stakeholder	Question/Comment	Response
	<p>activity predicted to be generated by the proposed development does not warrant seeking a specific contribution to tackle the specific issues identified within the ATZ analysis.</p> <p><u>Parking Stress Survey</u></p> <p>The site is located with the Wood Green Outer Controlled Parking Zone (CPZ) operating Monday-Saturday 08:00-18:30, but is immediately bound to the south by the Wood Green Inner CPZ operating Monday-Saturday 08:00-22:00.</p> <p>A parking stress survey following the Lambeth methodology within a 200m walking radius of the site was carried out in November 2021. In the Wood Green Outer CPZ operating Monday-Saturday 08:00-18:30, a total of 166 CPZ permit-holder spaces were identified, based on a 6m bay length. A number of other 'shared-use' (permit-holder and Pay-by-Phone) were also identified but appeared to be part of the adjacent Wood Green Inner CPZ. The parking stress survey results show that the average overnight stress within the local CPZ was around 73%. The existing stress level within the local CPZ is below the typical threshold of 85% beyond which parking starts becoming problematic.</p> <p><u>Proposed Car Parking</u></p> <p>As stated above, the existing site has 9 car parking spaces, and the redevelopment proposals would reduce this provision to 2 wheelchair-accessible spaces. The existing spaces serving the existing development would not need to be reprovided, either on site or displaced to local on-street locations. Swept path analysis demonstrates that both accessible spaces can be accessed and egressed easily within the site.</p> <p>Due to the site's high PTAL (5 – denoting very good connectivity), the site's location within a CPZ and the on-site provision of accessible parking in line with London Plan (2021) standards, the proposed development would qualify for a car-free status, in accordance with Policy DM32: Parking of the Development Management DPD.</p> <p>The Council would not issue any occupiers with on-street resident parking permits due to its car-free nature. The Council would use legal agreements (or equivalent) to require the landowners to advise all occupiers of the car-capped status of the proposed development.</p>	

Stakeholder	Question/Comment	Response
	<p>Staff driving to and from the site would be able to park within the Sandlings Estate, where the roads are controlled by Homes for Haringey and CPZ permits do not apply.</p> <p>Irrespective of its car-capped status, the proposed development would still likely generate a number of vehicles that would park in the local CPZ, namely visitors to the properties benefitting from visitor permits. The Transport Assessment examines local car ownership data from the 2011 Census, and concludes that the 14 units could generate parking demand for up to 7 vehicles. Adding 7 vehicles to the spare parking capacity in the local CPZ would increase the average overnight stress from 73% to 78%, which is still below the 85% occupancy threshold. Therefore, in the worst-case scenario where the proposed development would generate parking demand for up to 7 visitor vehicles, local streets would have sufficient capacity to accommodate any extra parking demand.</p> <p>Car club membership subsidies would also be sought by means of a planning obligation (or equivalent).</p> <p><u>Proposed Cycle Parking</u></p> <p>It is proposed to provide a total of 21 long-stay and 2 short-stay residential cycle parking spaces, which is in line with the London Plan (2021) minimum residential cycle parking standards.</p> <p>As far as the office element is concerned, with a floor area of 51.5sqm, a minimum of 2 long-stay and 2 short-stay spaces have been provided, in line with London Plan Policy T5.A Cycling which states that: <i>“Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.”</i></p> <p>In total, there would therefore be 23 long-stay and 4 short-stay spaces. It is proposed to provide 19 long-stay spaces in the form of economy two-tier racks, 3 long-stay spaces in the form of 2 Sheffield stands and 1 oversized cycle parking space for larger cycles (as a single-sided Sheffield stand) within an internal secure room, which will also accommodate space for 3 mobility scooters.</p>	

Stakeholder	Question/Comment	Response
	<p>It is noted that there would be a single store for both residents and office employees. Due to security concerns, this unusual configuration would have to be managed closely by the on-site facilities management company to avoid breaches and unauthorised access through access control measures (fob, key entry pad, key etc).</p> <p>The proposed aisle width in front of the economy two-tier racks appears sufficient; the minimum 1.8m width quoted in the Design and Access Statement only relates to Sheffield stands. However, the clear aisle width of 2,270mm would be in excess and therefore satisfy operational requirements to manoeuvre cycles in and out.</p> <p>The short-stay spaces are proposed to be provided as M-profile stands outside the primary entrance.</p> <p>At TfL's request, the applicant has confirmed that a bike repair kit would be provided in the cycle/mobility scooter store.</p> <p>The adequacy of the long-stay and short-stay cycle parking and access arrangements would be secured by planning condition. This would involve the provision of full details showing the parking systems to be used, access to them, the layout and space around the cycle parking spaces with all dimensions marked up on plans.</p> <p><u>Trip Generation Assessment</u></p> <p>Existing and proposed multi-modal trip generation assessments have been undertaken, based on TRICS surveys and a 2011 Census journey-to-work modal split. The net multi-modal trip generation shows an additional 25 pedestrian trips, an additional 11 public transport trips and, overall, an extra 46 extra person trips per day. The impact on local public transport networks is therefore considered minimal and could be easily accommodated without creating capacity issues.</p> <p>The net number of cars as a result of the proposed development has been estimated based on the raw car mode share directly derived from the 2011 Census. As there would be far less parking on site than currently, the predicted lift in car trips is likely to be less than predicted (+6 car trips, +10 vehicle occupant trips). Irrespective of a revised car mode share to take account of the future lower provision, the impact of car trips is forecast to be low.</p>	

Stakeholder	Question/Comment	Response
	<p><u>Travel Plan Statement</u></p> <p>A chapter of the Transport Assessment sets out a Travel Plan Statement promoting sustainable and active travel measures. It is noted that this has been provided despite the proposed development being below TfL's thresholds for a Travel Plan or a Travel Plan Statement.</p> <p>As this is a Council scheme, the Travel Plan would be secured by planning condition as opposed to a S.106 planning obligation.</p> <p><u>Proposed Delivery and Servicing Arrangements</u></p> <p>Residents would not have to carry refuse sacks more than 30m from their dwelling to the waste store. There would be 2 refuse stores on site. Bins would be collected from the Sandlings as part of the existing waste collection arrangements, with a maximum pull distance of 10m from the waste stores to the rear of the waste collection vehicles.</p> <p>It is understood that the existing electricity substation on site would be retained, with access from the Sandlings and a dedicated parking space for maintenance vehicles provided just off the Sandlings (not public highway).</p> <p>Deliveries would continue to operate from the kerbside along Russell Avenue. Delivery vehicles can usually load and unload along single-yellow and double-yellow lines for a maximum of 40 minutes, unless a loading bay operates during controlled hours. There do not appear to exist any such bans along Russell Avenue. Delivery vehicles can also park in residents' bays for up to 20 minutes during controlled hours.</p> <p>Outline Construction Logistics Plan</p> <p>The proposed delivery hours should consider excluding school pick-up times between 15:00 and 16:00.</p> <p>The document is clear that <i>"all contractors will be encouraged to use public transport"</i>, which is supported. It does however state that <i>"a small amount of on-site parking will be available or alternative local parking and nearby car parks will be used."</i></p>	

Stakeholder	Question/Comment	Response
	<p>The use of the private car for commuting should be an absolute last resort if sustainable modes of transport are not a realistic option. If this is inevitable, then car sharing should be favoured over single-occupancy car trips. It is acknowledged that the transportation of tools and heavy equipment may require the use of vans by specific sub-contractors, and it is noted that <i>“there will be a designated secure storage area within the site for contractors’ tools to avoid them having to be brought to the site”</i>, which is welcome. If needed, site operatives will have to be made aware that they cannot park lawfully in the vicinity unless they use Pay & Display bays or permission-to-park permits (formerly known as traders’ permits). The latter are only valid for one specific street for a given time, for resident or resident shared-use bays.</p> <p>To support active travel modes further, the demolition and construction site should have temporary cycle racks (such as toast racks) so that any operatives wishing to cycle to and from the site can do so.</p> <p>A Detailed Construction Logistics Plan would be secured by planning condition and should address the aforementioned comments.</p> <p>Recommended Planning Conditions:</p> <ul style="list-style-type: none"> - Cycle Parking Details - Travel Plan Statement (Interim/Pre-occupational and Full/Occupational versions, monitoring reports) including a £3,000 contribution - Detailed Construction Logistics Plan <p>Recommended Planning Obligations (or equivalent in the absence of a s.106 agreement):</p> <ul style="list-style-type: none"> - Car-Capped Agreement including a £4,000 contribution to amend the Traffic Management Order - Car Club Membership Subsidies 	
Carbon Management/	Carbon Management Response 10/06/2022	Noted conditions/

Stakeholder	Question/Comment	Response																																																								
Energy & Sustainability	<p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none">• Energy, Sustainability & Overheating Statement prepared by Savills Earth (dated February 2022, Rev 02)• Relevant supporting documents. <p>1. Summary</p> <p>The development achieves a reduction of 101% carbon dioxide emissions on site, which is supported. Some clarifications must be provided with regard to the overheating strategy. Appropriate planning conditions will be recommended once this information has been provided.</p> <p>2. Energy – Overall</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 CO₂ emissions for the development shows an improvement of approximately 101% 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 13.8 tonnes of CO₂ from a baseline of 13.7 tCO₂/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 5.85 tCO₂.</p> <table><tr><th></th><th colspan="2">Residential</th><th colspan="2">Non-residential</th><th colspan="2">Site-wide</th></tr><tr><th>(SAP10 emission factors)</th><th>tCO₂</th><th>%</th><th>tCO₂</th><th>%</th><th>tCO₂</th><th>%</th></tr><tr><td>Baseline emissions</td><td>13.2</td><td></td><td>0.5</td><td></td><td>13.7</td><td></td></tr><tr><td>Be Lean savings</td><td>1.3</td><td>10%</td><td>0.1</td><td>13%</td><td>1.3</td><td>10%</td></tr><tr><td>Be Clean savings</td><td>0</td><td>0%</td><td>0</td><td>0%</td><td>0</td><td>0%</td></tr><tr><td>Be Green savings</td><td>11.9</td><td>91%</td><td>0.5</td><td>93%</td><td>12.5</td><td>91%</td></tr><tr><td>Cumulative savings</td><td>13.2</td><td>100%</td><td>0.6</td><td>108%</td><td>13.8</td><td>101%</td></tr><tr><td>Carbon shortfall to offset (tCO₂)</td><td>0</td><td></td><td>0</td><td></td><td>-0.1 (no offset due)</td><td></td></tr></table>		Residential		Non-residential		Site-wide		(SAP10 emission factors)	tCO ₂	%	tCO ₂	%	tCO ₂	%	Baseline emissions	13.2		0.5		13.7		Be Lean savings	1.3	10%	0.1	13%	1.3	10%	Be Clean savings	0	0%	0	0%	0	0%	Be Green savings	11.9	91%	0.5	93%	12.5	91%	Cumulative savings	13.2	100%	0.6	108%	13.8	101%	Carbon shortfall to offset (tCO ₂)	0		0		-0.1 (no offset due)		Planning Obligations attached.
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Stakeholder	Question/Comment	Response																								
	<p>Energy – Lean</p> <p>The applicant has proposed a site-wide saving of 1.3 tCO₂ in carbon emissions (10% for residential; 15% for non-residential) through improved energy efficiency standards in key elements of the build, based on SAP2012 carbon factors. It meets the minimum 10% and 15% reduction respectively set in London Plan Policy SI2 for residential and non-residential spaces, so this is supported.</p> <p>The following u-values, g-values and air tightness are proposed:</p> <table><tr><td>Floor u-value</td><td>0.10 W/m²K</td></tr><tr><td>External wall u-value</td><td>0.14 W/m²K (wall to unheated spaces 0.13 W/m²K)</td></tr><tr><td>Roof u-value</td><td>0.10 W/m²K</td></tr><tr><td>Door u-value</td><td>1.00 W/m²K</td></tr><tr><td>Window u-value</td><td>1.40 W/m²K</td></tr><tr><td>G-value</td><td>0.55</td></tr><tr><td>Air permeability rate</td><td>3 m³/hm² @ 50Pa</td></tr><tr><td>Ventilation strategy</td><td>Natural ventilation with mechanical ventilation (through combined exhaust heat pump; 1.66 ach) with summer bypass</td></tr><tr><td>Thermal bridging</td><td>Y = 0.05</td></tr><tr><td>Low energy lighting</td><td>100% plus daylight control in office</td></tr><tr><td>Space heating requirement (calculated in SAP)</td><td>28.6 kWh/m²/year (site-wide average)</td></tr><tr><td>Improvement from the target fabric energy efficiency (TFEE)</td><td>18% improvement, from 50.13 to 41 kWh/m²/year</td></tr></table> <p>Overheating is dealt with in more detail below.</p> <p>Energy – Clean</p> <p>The applicant is not proposing any Be Clean measures. 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>	Floor u-value	0.10 W/m ² K	External wall u-value	0.14 W/m ² K (wall to unheated spaces 0.13 W/m ² K)	Roof u-value	0.10 W/m ² K	Door u-value	1.00 W/m ² K	Window u-value	1.40 W/m ² K	G-value	0.55	Air permeability rate	3 m ³ /hm ² @ 50Pa	Ventilation strategy	Natural ventilation with mechanical ventilation (through combined exhaust heat pump; 1.66 ach) with summer bypass	Thermal bridging	Y = 0.05	Low energy lighting	100% plus daylight control in office	Space heating requirement (calculated in SAP)	28.6 kWh/m ² /year (site-wide average)	Improvement from the target fabric energy efficiency (TFEE)	18% improvement, from 50.13 to 41 kWh/m ² /year	
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Stakeholder	Question/Comment	Response
	<p>Energy – Green</p> <p>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 exhaust air source heat pumps (EASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 12.4 tCO₂ (91%) reduction of emissions are proposed under Be Green measures.</p> <p>The solar array peak output would be 43.2 kWp, which is estimated to produce around 38,880 kWh/year of renewable electricity per year. The array of 106 panels would be mounted on a roof area of 170 m², at a 15° angle, facing south-west. The electricity generated from the PV array will be directly connected to the dwellings.</p> <p>The individual air-to-water exhaust air heat pumps (min. SCOP of 3.4) will provide hot water and heating to the dwellings through underfloor heating. The system will also provide ventilation, heat recovery and hot water using an in-built hot water tank, immersion heater, circulation pump, fans and control system.</p> <p>The cooling to ground floor dwellings would be provided by individual wall-mounted cooling units (SEER 6.3).</p> <p>1. Carbon Offset Contribution</p> <p>No carbon shortfall of regulated operational emissions remains, therefore not carbon offset contribution is required.</p> <p>2. Overheating</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 in line with CIBSE TM59, and the cooling hierarchy has been followed in the design. The report has modelled all 14 dwellings (14 bedrooms; 14</p>	

Stakeholder	Question/Comment	Response														
	<p>living/kitchens), the office space, and top floor corridor using the TM49 London Weather Centre files.</p> <p><i>Residential</i></p> <p>Results are listed in the table below. Based on the baseline case (no internal blinds, closed windows at ground floor), none of the rooms pass the more extreme weather files (2020s DSY2 or 3, 2050s or 2080s). When adding ground floor cooling, the six bedrooms pass all extreme weather files. When adding internal blinds, further bedrooms and l/k/d rooms pass more extreme weather files.</p> <p>The table shows results for the baseline and mitigation (GF cooling and internal blinds).</p> <table><tr><th></th><th>Number of habitable rooms pass TM59 (residential)</th></tr><tr><td>DSY1 2020s baseline</td><td>14/14 kitchen/living/dining rooms 8/14 bedrooms</td></tr><tr><td>DSY1 2020s with mitigation (incl cooling GF)</td><td>14/14 kitchen/living/dining rooms 14/14 bedrooms</td></tr><tr><td>DSY2 2020s with mitigation (cooling GF + internal blinds)</td><td>8/14 kitchen/living/dining rooms 10/14 bedrooms</td></tr><tr><td>DSY3 2020s with mitigation (cooling GF + internal blinds)</td><td>9/14 kitchen/living/dining rooms 7/14 bedrooms</td></tr><tr><td>DSY1 2050s with mitigation (cooling GF + internal blinds)</td><td>14/14 kitchen/living/dining rooms 6/14 bedrooms</td></tr><tr><td>DSY1 2080s with mitigation (cooling GF + internal blinds)</td><td>0/14 kitchen/living/dining rooms 6/14 bedrooms</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">- Natural ventilation, with openable areas of 50% (except ground floor windows for which the assessment assumes they will remain closed)- Glazing g-value of 0.36 (including internal blinds with a solar transmittance of 11%)		Number of habitable rooms pass TM59 (residential)	DSY1 2020s baseline	14/14 kitchen/living/dining rooms 8/14 bedrooms	DSY1 2020s with mitigation (incl cooling GF)	14/14 kitchen/living/dining rooms 14/14 bedrooms	DSY2 2020s with mitigation (cooling GF + internal blinds)	8/14 kitchen/living/dining rooms 10/14 bedrooms	DSY3 2020s with mitigation (cooling GF + internal blinds)	9/14 kitchen/living/dining rooms 7/14 bedrooms	DSY1 2050s with mitigation (cooling GF + internal blinds)	14/14 kitchen/living/dining rooms 6/14 bedrooms	DSY1 2080s with mitigation (cooling GF + internal blinds)	0/14 kitchen/living/dining rooms 6/14 bedrooms	
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Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> - 300mm window recesses - MVHR with summer bypass (1.66 ach) - Active cooling only for the ground floor dwellings where openable windows are a security risk <p>The top floor corridor was modelled, showing no hours above the target temperature of 28°C.</p> <p><i>Office space</i></p> <p>The office space was modelled under CIBSE TM52 and passed the DSY1 2020s weather file.</p> <p><u>Overheating actions:</u></p> <ul style="list-style-type: none"> - The active cooling should only be added as a last mitigation measure, after all other measures have been exhausted in line with the Cooling Hierarchy. This is to reduce any overheating risk and cooling demand before a system is sized (where this is deemed necessary and justified). The report indicates that modelling had taken place using other mitigation measures, please provide results under the DSY 1 2020s weather file only to demonstrate the mitigation measures higher up the Cooling Hierarchy have been maximised before incorporating any active cooling measures. - Furthermore, what other options have been considered to overcome the security risks at ground floor to allow for some natural ventilation through secure openings (that would comply with the new Building Regulations Part O)? - If the response to the above points shows that active cooling is justified and reasonable, please confirm what the modelled cooling demand for the ground floor dwellings is (in kWh/m²/year). <p>3. Sustainability</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><i>Non-Domestic BREEAM Requirement</i></p> <p>Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very</p>	

Stakeholder	Question/Comment	Response
	<p>Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.</p> <p>The applicant has prepared an indicative BREEAM Pre-Assessment Report for the office space. Based on this report, a score of 63% is expected to be achieved, equivalent to 'Very Good' rating.</p> <p><i>Living roofs/walls</i></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.</p> <p>A living wall is proposed along the western flank wall. Living walls should be rooted in the ground with sufficient substrate depth.</p> <p>Living roofs and walls are supported in principle, subject to detailed design. Details will need to be submitted as part of a planning condition.</p> <p><i>Biodiversity</i></p> <p>The development achieves an Urban Greening Factor of 0.45, which exceeds the interim minimum target of 0.4 for predominantly residential developments in London Plan Policy G5.</p> <p>This will also result in a biodiversity net gain through soft landscaping, green roofs, management of non-native invasive species on site (although this has not been quantified within the report).</p> <p><i>Whole Life Carbon</i></p> <p>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 an assessment has been undertaken in support of this scheme.</p>	

Stakeholder	Question/Comment	Response									
	<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>895 kgCO₂e/m²</td><td>Does not meet GLA target (800 kgCO₂e/m²) or LETI aspirational target (500 kgCO₂e/m²)</td></tr> <tr> <td>Modules B-C (excl. B6 and B7)</td><td>762 kgCO₂e/m²</td><td>Does not meet GLA target (400 kgCO₂e/m²) or LETI aspirational target (240 kgCO₂e/m²)</td></tr> </tbody> </table> <p>The highest embodied carbon was calculated in Modules A1-A3 (materials, 36.3%), B6b (unregulated energy, 27.5%) and B4 (replacement, 24.5%). The development now includes a cross-laminate timber frame, an all-electric strategy with lower GWP refrigerants to reduce the embodied emissions.</p> <p>It is noted that this development does not need to meet any whole-life carbon targets as it is not a development referable to the GLA. However, a number of areas have been identified to calculate more accurately and to reduce the embodied carbon of the buildings:</p> <ul style="list-style-type: none"> • Minimisation of the quantities of materials required • Specification of materials responsibly and sustainably, including a refrigerant with low Global Warming Potential • Designing for longevity, adaptability and reusability • Designing out construction, demolition, excavation and municipal waste through the use of prefabrication methods where appropriate <p>Circular Economy 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</p>		Estimated carbon emissions	Meets benchmark?	Modules A1-A5	895 kgCO ₂ e/m ²	Does not meet GLA target (800 kgCO ₂ e/m ²) or LETI aspirational target (500 kgCO ₂ e/m ²)	Modules B-C (excl. B6 and B7)	762 kgCO ₂ e/m ²	Does not meet GLA target (400 kgCO ₂ e/m ²) or LETI aspirational target (240 kgCO ₂ e/m ²)	
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Stakeholder	Question/Comment	Response				
	<p>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. This application is not required to submit a full statement.</p> <p>Planning Conditions To be secured (with detailed wording TBC):</p> <ul style="list-style-type: none">- Energy strategy- Overheating- Living roofs and living wall- Biodiversity <p>Planning Obligations Heads of Terms</p> <ul style="list-style-type: none">- Be Seen commitment to uploading energy data- Energy Plan and Sustainability Review <p>Carbon Management Response 01/08/2022</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none">• Energy, Sustainability & Overheating Statement prepared by Savills Earth (dated June 2022, Rev 03)• SJA Responses, dated 7th July 2022• Relevant supporting documents. <p>Overheating All active cooling measures on the ground floor have been removed. Natural ventilation is now proposed through secure screens in front of ground floor bedroom windows.</p> <p>Results are listed in the table below. The baseline with natural ventilation passes the mandatory weather file, but the bedrooms do not pass more extreme files. Four living/kitchens pass DSY1 2050s under the baseline scenario.</p> <table><tr><th></th><th>Number of habitable rooms pass TM59 (residential)</th></tr><tr><td>DSY1 2020s baseline</td><td>14/14 kitchen/living/dining rooms</td></tr></table>		Number of habitable rooms pass TM59 (residential)	DSY1 2020s baseline	14/14 kitchen/living/dining rooms	
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Stakeholder	Question/Comment			Response
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	DSY1	2050s (internal blinds)	10/14 kitchen/living/dining rooms 0/14 bedrooms	
	DSY1	2080s (internal blinds)	0/14 kitchen/living/dining rooms 0/14 bedrooms	
	<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">- Natural ventilation, with secure screens at ground floor to allow for night-time ventilation- Glazing g-value of 0.36- 300mm window recesses- MVHR with summer bypass (1.66 ach)- Internal blinds (solar transmittance of 11%) <p>The overheating strategy is acceptable.</p> <p>Planning Conditions To be secured:</p> <p><u>Energy Strategy</u> The development hereby approved shall be constructed in accordance with the Energy, Sustainability & Overheating Statement prepared by Savills Earth (dated June 2022, Rev 03) delivering a minimum 101% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, air source heat pumps (ASHPs), a minimum 43.2 kWp solar photovoltaic (PV) array, and approved overheating mitigation measures.</p> <p>(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:</p>			

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> - Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy, and if it doesn't, to calculate the carbon offset contribution at £2,850 per tCO₂; - Confirmation of the necessary fabric efficiencies to achieve a minimum 10% (residential) and 15% (non-residential) reduction in SAP2012 carbon factors, including details to reduce thermal bridging; - A revised Overheating Strategy where the design has been altered; - Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures; - Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the units; - 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); - A metering strategy. <p>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.</p> <p>(b) Within six months of first occupation, as-built SAP and BRUKL calculations, air tightness testing certificates, evidence that the solar PV and ASHPs installations 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.</p> <p>(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.</p> <p>(d) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the</p>	

Stakeholder	Question/Comment	Response
	<p>approved Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant involvement to evidence this training and engagement.</p> <p>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.</p> <p><u>Overheating Building User Guide</u></p> <p>Prior to occupation, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems. The Building User Guide will be issued to residential occupants upon first occupation.</p> <p>Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.</p> <p><u>Living roofs and walls</u></p> <p>(a) Prior to the commencement of development, details of the living roofs and living wall 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:</p> <ul style="list-style-type: none"> i) A roof plan identifying where the living roofs will be located and a ground floor plan identifying where the living walls will be rooted in the ground, if any; ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces); iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate iv) Details of the proposed type of invertebrate habitat structures with a minimum of one 	

Stakeholder	Question/Comment	Response
	<p>feature per 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays;</p> <p>v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with roof ball of plugs 25m³) 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);</p> <p>vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</p> <p>vii) Management and maintenance plan, including frequency of watering arrangements.</p> <p>(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 roofs has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.</p> <p>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, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</p> <p><u>Biodiversity</u></p> <p>(a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.</p> <p>(b) Prior to the occupation of development, photographic evidence and a post-development</p>	

Stakeholder	Question/Comment	Response
	<p>ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.</p> <p>Development shall accord with the details as approved and retained for the lifetime of the development.</p> <p>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</p> <p>Planning Obligations Heads of Terms</p> <ul style="list-style-type: none"> - Carbon offset contribution where the zero-carbon policy requirement has not been met, at £2,850 per tCO2. - Be Seen commitment to upload data 	
Interim Recycling Manager	<p>I've looked at the planning application and associated documents and the space and containers allocated for waste and recycling as outlined in the design and access statement, meet the requirements we'd expect for this scale of development. Servicing of the waste and recycling will be provided via the Sandlings and there are no obvious issues with this proposal as the road is already accessible for service vehicles. I couldn't find any information about how the bin stores would be secured and we would advise that access is given to residents only by preferably a fob/digilock rather than a key. Fobs/codes will need to be shared with LBH prior to occupation.</p> <p>There is a communal garden as part of the new development but no reference as to how the 'green waste' from this area would be managed. It would be good to check that arrangements are in place for this waste stream to ensure it will be recycled or composted.</p>	Noted, requested amendments provided.
Waste	<p>- Food waste - requirement for 14 flats 280L and max bin size is now 140L (due to weight), therefore 2x 140L (one in each store) should be sufficient.</p>	Noted.

Stakeholder	Question/Comment	Response
	<p>- Waste from the office (commercial waste) must be kept separate (in separate bins) from residential waste</p>	
<p>LBH Pollution</p>	<p>Having considered all the supportive information especially the Air Quality Assessment Report Revision A prepared by Aeolus Air Quality Consulting Ltd dated November 2021 taken note of sections 3 (Methodology), 4 (Baseline Conditions), 5 (Potential Impacts), 6 (Mitigations Measures) and 7 (Conclusion) with the report submission in subsection 3.3.2 that no gas fired plant with associated flue stacks will be installed whilst heating and hot water will be provided by Air Source Heat Pumps (ASHP) & Solar Panel as well as the Phase I Land Contamination Assessment report with reference EES 21. 239.1 prepared by Ecologia Environmental Solutions Ltd dated February 2022 taken note of sections 5 (Outline Conceptual Site Model), 6 (Conclusions and Recommendations) and Table 5.4 (Outline Conceptual Site Model & Preliminary Risk Assessment), please be advise that we have no objection to the proposed development but the following planning conditions are recommend should planning permission be granted.</p> <p><u>1. Land Contamination</u></p> <p>Before development commences other than for investigative work:</p> <ol style="list-style-type: none"> Using the information already submitted in Phase I Land Contamination Assessment report with reference EES 21. 239.1 prepared by Ecologia Environmental Solutions Ltd dated February 2022, an intrusive/ground investigation, assessment and modelling of identified contaminants set in the context of the proposed development shall be conducted 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. 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. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and; 	<p>Noted. Conditions and informative added</p>

Stakeholder	Question/Comment	Response
	<p>d. A report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.</p> <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>2. Unexpected Contamination If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <p>Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.</p> <p>3. NRMM</p> <p>a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.</p> <p>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>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the</p>	

Stakeholder	Question/Comment	Response
	<p>GLA NRMM LEZ</p> <p>4. <u>Demolition/Construction Environmental Management Plans</u></p> <p>a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst</p> <p>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> <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>	

Stakeholder	Question/Comment	Response
	<p>iii. Delivery booking systems; iv. Agreed routes to/from the Plot; v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching. d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include: i. Mitigation measures to manage and minimise demolition/construction dust emissions during works; ii. Details confirming the Plot has been registered at http://nrmm.london; iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection); v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate.</p> <p>The development shall be carried out in accordance with the approved details as well as on the applicant submitted proposed mitigation in the Air Quality Report Appendix C whilst we look forward to agreeing real monitoring locations with the applicant for the demolition phase.</p> <p>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.</p> <p><u>Reason:</u> 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><u>Informative:</u></p>	

Stakeholder	Question/Comment	Response
	<p>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.</p>	
Flood and Water Management	<p>Having reviewed the applicant's submitted Flood Risk Assessment Report reference number 5781035 Revision V5 dated 14th February 2021 and Sustainable Drainage Statement reference number 5781035 Revision 4 dated 14th February 2022 , please see below some of our observations:</p> <p>1) The submitted Flood Risk Assessment and Sustainable Drainage Statement confirm that the propose discharge rate will from the above site will be 2 l/s for 1 in 100 yr + 40% Climate change event and the site will be providing an attenuation storage for the same event to 107cum.</p> <p>However, as a part of Full application, we would like to see a full range of rainfall data for each return period provided by Micro drainage modelling or similar simulating storms through the drainage system, with results of critical storms, demonstrating that there is no surcharging of the system for the 1 in 1 year storm, no flooding of the site for 1 in 30 year storm and that any above ground flooding for 1 in 100 year storm is limited to areas designated and safe to flood, away from sensitive infrastructure or buildings. These storms should also include an allowance for climate change.</p> <p>2) Micro Drainage "Source Control" output will not be considered as a proper assessment. Please also note that for the calculations, we request that the applicant utilises more up to date FEH rainfall datasets.</p>	Noted. Condition added.
LBH Building Control	<p>The proposed housing development fire strategy appears to comply with Requirement B of the Building Regulations. Fire fighting access, in particular using The Sandlings as access and the dry riser inlet not being by the main entrance, will need to be agreed with the London Fire Brigade, as part of the Building Control consultation process. The proposed development will be subject to a detailed check when the application is formally submitted to Building Control.</p>	Noted.
LBH Arboriculture	<p>I hold, from an arboricultural point of view, no initial objections to the proposal.</p>	Noted.

Stakeholder	Question/Comment	Response
	<p>The proposal has been submitted with an Arboricultural Impact Assessment (AIA) carried out by Arboricultural Solutions revised dated February 2022. The survey has been carried out to British Standard 5837: 2012 Trees in relation to design, demolition and construction-Recommendations.</p> <p>I concur with much of the report including the tree quality classification.</p> <p>The removal of the low-grade trees T5 Alder (with poor morphology), and T12 self-set Sycamore is compensated by the Landscape Plan and the proposed planting (net gain).</p> <p>It is recognised that there is encroachment into the root protection areas (RPAs) of T2, T3 and T6- T10. This amounts to 10% encroachment and 20% encroachment into T10. These are minimum encroachments and acceptable providing the specialised micro piles, and high beams as set out within the report, are used within the RPAs.</p> <p>Providing all the sections within the AIA are conditioned including the addition of Arboricultural Method Statements for all works including, ground protection, landscaping, surfacing, utilities within the RPAs, I see no reason for any objections.</p> <p>Drawing title Tree Protection Plan existing will need to be adhered to and put in place prior to any works on site.</p> <p>We would also require a specification and species list for the re planting, a five-year aftercare programme for the establishment and re placement planting of the site, and the that the Arboricultural Consultant is kept on to the fulfilment and delivery of the project.</p>	<p>Conditions added.</p>
EXTERNAL		
Thames Water	<p>Waste Comments</p> <p>With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.</p>	<p>Noted. Informatives attached.</p>

Stakeholder	Question/Comment	Response
	<p data-bbox="541 232 1587 289">https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services.</p> <p data-bbox="541 329 1791 898">The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p data-bbox="541 938 1791 1393">We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business</p>	

Stakeholder	Question/Comment	Response
	<p>customers; Groundwater discharges section.</p> <p>There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes.</p> <p>Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.</p> <p>Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Water Comments</p> <p>There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes</p> <p>If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.</p> <p>The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment</p>	

Stakeholder	Question/Comment	Response
	<p>Agency's approach to groundwater protection (available at https://www.gov.uk/government/publications/groundwater-protection-position-statements) and may wish to discuss the implication for their development with a suitably qualified environmental consultant.</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p> <p>The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk</p>	
Metropolitan Police Designing Out Crime	<p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations.</p>	<p>Noted, Conditions attached.</p>

Stakeholder	Question/Comment	Response
	<p>These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</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 and agent to discuss Crime Prevention and Secured by Design. We have concerns around the design and layout of the development. The Architects have made mention in the Design and Access Statement referencing design out crime or crime prevention. DOCOs to ensure that the development is designed to reduce crime at detailed design stage. At this point it can be difficult to design out fully any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences. Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity.</p> <p>The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p>Section 2 - Secured by Design Conditions and Informative: In light of the information provided, we request the following Conditions and Informative: Conditions: A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development.</p> <p>The development shall only be carried out in accordance with the approved details.</p>	

Stakeholder	Question/Comment	Response
	<p>B. Prior to the first occupation of each building or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.</p> <p>Informative: The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p> <p>Section 3 - Conclusion:</p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p> <p>Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.</p>	
<p>Transport for London</p>	<p>Thank you for consulting TfL. Regarding the above application, we have the following comments</p> <p>1) The site of the proposed development is located approximately 250m west of the A105 High Road and thA1080 Westbury Avenue which both form part of the Strategic Road Network (SRN). TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on thSRN.</p> <p>- The footway and carriageway on the A105 and A1080 should not be blocked during erection of the advertiseme Temporary obstructions during the development should be kept to a minimum and should not encroach on the clspace needed to provide safe passage for pedestrians or obstruct the flow of traffic. All vehicles should only pastop at permitted locations and within the time periods permitted by existing on-street restrictions.</p> <p>2) The applicant has proposed to remove 9 car parking spaces, which is welcomed by TfL, in line with London Plan Policy T6.1. The planning statement states the development will be car</p>	<p>Noted. The applicant is not providing any new car parking spaces along The Sandlings.</p> <p>Noted. The spaces have been reconfigured but the number of spaces remains the same.</p>

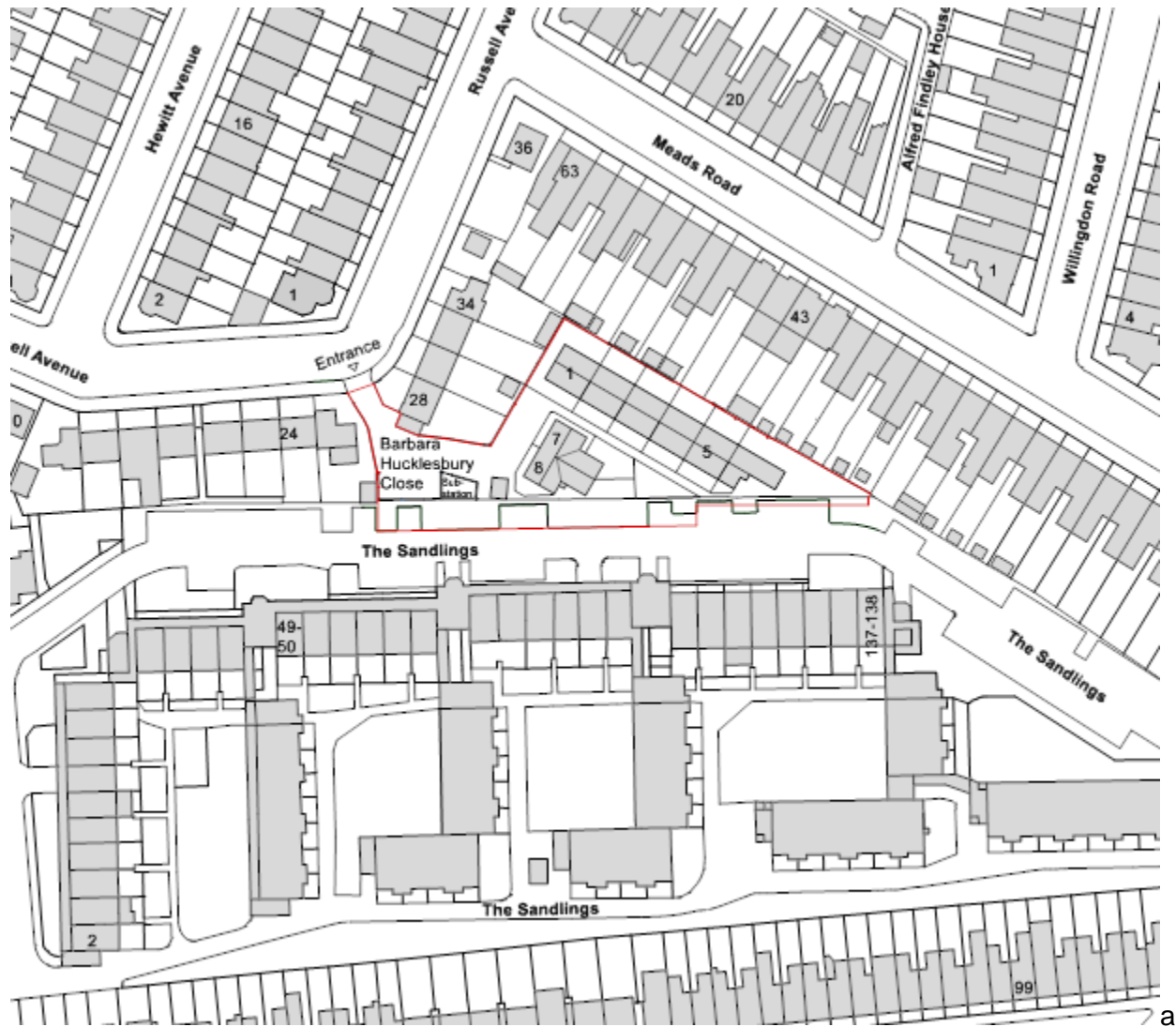
Stakeholder	Question/Comment	Response
	<p>free apart from two accessible bays. However, in the proposed ground floor plans provided, there seems to be more than 9 existing spaces within the development red line boundary. From the plans provided, there is 8 further car parking spaces on-street on the Sandlings within the red line boundary. Due to the site having a PTAL of 5, TfL request that these parking spaces also removed, in line with London Plan Policy T6.1 and car free aspiration of the applicant.</p> <p>3) The applicant proposed a total of 26 cycle parking spaces, this is in line with the minimum requirements set out in London Plan Policy T5 (Cycling). TfL welcomes the accessible mix proposed by the applicant in the cycle store.</p> <p>4) TfL request that that this development does not impact in any way the journey times, reliability or the manner which bus stops are served</p> <p>5) TfL welcomes that an ATZ assessment was conducted and support London Borough of Haringey securing a number of improvements identified in the ATZ. This would be in accordance with London Plan Policies T2 (HealthyStreets), D7 (Public Realm) and T1 (Strategic approach to transport)</p> <p>6) TfL request that the applicant provides and funds a bike repair kit within the proposed cycle store.</p> <p>7) TfL welcome the proposed compliance with both FORS and CLOCS</p> <p>- Regarding the proposed hoarding during the construction stage, TfL request that the applicant uses a soft light pastel colour, in order in order to reduce security risks and concerns to pedestrians. We also request that the applicant proposes a maintenance plan for the hoarding, in order to reduce impact of potential graffiti</p> <p>TfL request that the existing on-street car parking spaces are removed before we can support this proposal</p>	
NEIGHBOURING PROPERTIES	<p><u>Safety concerns regarding proposed residents</u></p> <p>Officer Comment: The accommodation shall only be occupied by people who are known to and</p>	Condition added.

Stakeholder	Question/Comment	Response
<p>No of individual responses: 6</p> <p>Objecting: 6</p>	<p>receiving services from Haringey Adults Social Care and NHS services in accordance with a Management Plan that shall be submitted to and approved in writing by the Local Planning Authority prior to occupation.</p> <p>Prior to acceptance into this housing, an assessment will be undertaken with each potential resident, which will serve to inform the decision regarding their suitability for the accommodation. Each resident in the accommodation will receive a personalised package of care, designed specifically to meet their individual needs.</p> <p>Each resident will be assigned their own support worker. There will be out-of-hours telephone support available to residents. In case of emergency and this is fortified with the inclusion of a Duty Manager on-call 24 hours for every day of the year, who our staff can contact in the event of an emergency at any one of our services. Neighbours will be offered a contact sheet when the service opens, detailing the names and contact details of staff and managers they can contact should any questions or concerns arise</p> <p><u>Loss of mature trees</u></p> <p>Officer Comment: The submitted Arboriculture Assessment identifies two trees for removal; Tree T5 (Italian Alder), and T12 (Sycamore). Both trees are within the boundary of Barbara Hucklesbury Close. T5 will require removal to facilitate the development and is the sole tree required to facilitate the proposal. The report recommends that tree T12, is removed on the basis of its poor form. Both trees are identified as a category C (low or limited impact) of average condition, therefore their removal is considered acceptable. Nine new semi-mature trees new trees will be planted across the site.</p> <p>The remaining trees will be retained and subject to protection measures during construction.</p> <p><u>Impact of increased parking</u></p> <p>Officer Comment: A 'car-free' development is proposed meaning only wheelchair accessible parking is provided on site and permits would not be allocated to the new properties for on-street parking. The Council would use legal agreements (or equivalent) to achieve this.</p> <p><u>Rehousing of existing residents/Loss of Bungalows</u></p>	<p>Conditions Added.</p> <p>Conditions Added.</p> <p>Noted.</p>

Stakeholder	Question/Comment	Response
	<p>Officer Comment: The site is used as temporary accommodation and is now, largely vacant. The structures are in a poor state of repair, offering a sub-standard form accommodation and are at end of their usability.</p> <p><u>Loss of Water pressure</u></p> <p>Officer Comment: Thames water have been consulted and raise no such concerns</p> <p><u>Impact of neighbouring properties</u></p> <p>Officer comment: The position and scale of the proposed development in relation to neighbouring buildings ensures that the outlook, privacy and level of sunlight/daylight enjoyed by existing residents will not be adversely affected.</p>	<p>Noted.</p> <p>Noted.</p>

Appendix 3 Plans and Images

Location Plan



Aerial View from Noel Park.



Heights of proposal in relation to surroundings





View From Communal Garden



View From The Sandlings

Soft Landscaping Plan.

