Appendix 3 – Consultation Responses from Internal and External Agencies

Stakeholder (LBH)	***Comments***	***Response***
Design Officer	This application is for the bulk of the Site Allocations DPD (adopted July 2017) allocated site SA 63. It is a sensitive site, sandwiched between the Peabody Cottages and Bruce Castle Conservation Areas (with a small part of the site being within the latter) and in close proximity to statutory and locally listed buildings, including the Grade I Listed Bruce Castle. But it is a site in need of improvement, consisting largely of a number of derelict former car repair workshops and yards, and on a prominent corner at the junction of The Roundway with Lordship Lane. It also has frontage on the much narrower and quieter Church Lane, as well as adjoining a petrol station on The Roundway, another, still operating car repairers ("Spurz Autos") and a substation on Lordship Lane, and a nursery school, in a listed building, on Church Lane. The proposals are for a residential development in the form of modest "mansion blocks", with commercial uses on the ground floor, fronting The Roundway, including the site's corner and short frontage to Lordship Lane, in the ground floor of two blocks of five storeys (Blocks A & B), with residential above. A new public route will cut across the site east to west, aligned to the side entrance to Bruce Castle east of Church Lane, providing a glimpsed view of Bruce Castle from The Roundway and a route to the castle and its large surrounding park from the adjacent bus stop on The Roundway. The route, which would be gated at night, would lead into a central landscaped courtyard, with communal entrance doors to the upper floor flats of Blocks A & B to its west, and Block C, north of the route & courtyard, to the north, as well as to private front doors and short front gardens to ground floor flats in Block C, who's heigh will step down from 4 to 3 storeys where it gets closer to Church Lane. Block D, to the north & also of 3 and 4 storeys would face Church Lane behind a deep front garden, allowing the building line to step back to close to the listed nursery to its north. The proposed Form, Height, Bulk and Massing is considered to be excellent, modest and appropriate to the sensitive setting.	Comments have been taken into account. Materials and retention of architect to be controlled by condition.

Stakeholder (LBH)	***Comments***	***Response***
	Elevational treatment of the proposals is a restrained, polite, brick based architecture that will appear contemporary and yet compatible with and making reference to its surrounding context, particularly the Peabody Cottages conservation area of repetitive brick two storey terraced houses, the late nineteenth and early twentieth century larger houses, pub and mansion blocks on Lordship Lane and the Georgian sand Victorian listed and conservation area buildings of Church Lane. Window and recessed balcony proportions along The Roundway are more horizontal, referencing most the 1930s mansion blocks on Lordship Lane, offset by a strong vertical rhythm of bays defined by recessed slots for rainwater pipes, referencing the rhythm of Peabody Cottages, with larger windows and regularly spaced doors to the ground floor commercial units providing active frontage and a “base”, and recessed top floor in darker, metallic finish, providing a “top”. At the corner, deep overhangs and recessed brick panels provide a modest but distinct celebration of the corner, in what will overall be a sober but elegant, significant improvement on the existing site, appropriate development for this significant street frontage and corner. Through the courtyard and onto the Church Lane frontage the architecture subtly changes to more vertically proportioned, less orderly, more relaxed, but still elegant form as the height reduces through four floors to three floors. Balconies change to semi-recessed close to Church Lane and fully projecting onto the central courtyard and set-back Block D frontage, which is appropriate, bringing more animation to these amenity spaces. The entrance, stairs and lift to Block D, around the back, where it backs onto the back of the neighbouring petrol station, minimises the number of habitable rooms with that less salubrious outlook, but the seclusion of the entrance would be unacceptable if not for the access controlled gate, where their Entryphone bells and post boxes will be, being a sheltered gate at the front of the property, beside the nursery, although it is recommended details of this element are included in the details required to be subject to condition.	

Stakeholder (LBH)	***Comments***	***Response***
	The proposals fulfil the site allocation requirement to show in a masterplan how the Petrol Station and Spurz Autos sites could be developed in harmony with this proposal. This shows similar mansion blocks stepping down to 4 and 3 storeys along the Roundway frontage of the petrol station, with private amenity behind, appropriately dropping in height to the two storey terraced housing to its north, and it is to be hoped a development of this form comes forward on this site, although the proposals in this application are perfectly capable of being neighbours to the continuing petrol station. On Spurz Autos, the applicants suggest a similar but 4 storey mansion block across its whole frontage, with amenity space to its north opening onto the central courtyard, although these applicants show that their design would work just as well if no change happened on the neighbouring site. Officers would welcome a similar development and integration with the courtyard, but would note that a building of initially 5 storeys, matching this proposals' height, stepping down to 4 and then 3 storeys closest to the substation, would be more likely. The applicants report that the owners of the sub station, which is a handsome, if utilitarian, pitched roofed, 2 storey, brick building in poorly maintained grounds enclosed by ugly, utilitarian steel fencing, have no intention of making any changes to it, but officers would hope that at least some or all of the grounds around it could be opened up to public access, with attractive paving and landscaping, and if so, it would be important that these developers & owners put no impediment in that way and are willing to open up their courtyard and route to it, as this would lead to further significant improvements to the public realm. Residential quality is generally excellent, with exemplary day and sunlight performance and a high 80% dual aspect. Although officers disagree with the applicants' definition of flats in Block A with a second aspect onto access balconies against the boundary to Spurz Autos, noting that site being likely (and indeed masterplanned by this applicant) to be developed up to the boundary, but this would only reduce the dual aspect to 70%, or 72% if the top floor were not counted, which it need not be as it could be open above. Officers would also note in mitigation that these flats should still benefit from	

Stakeholder (LBH)	*Comments*	*Response*
	cross ventilation, even after a development next door. None of the single aspect flats are north facing. The range of different flat types across this proposal would all have private external amenity space as well as access to private communal roof terraces over Blocks C and D, with access to all residents either via a "bridge" link at 4th floor level between Blocks A & B or by fob access. The bridge at 4th floor over the "alleyway" between The Roundway and the central courtyard is considered a good design, providing incident and further passive surveillance to the passageway as well as useful integrated amenity space access, which it should be noted means residents of affordable and market housing equally share amenities. The lower floor, dead-end balconies over the through route are, to officers, of more doubtful purpose, but apparently arose out of a suggestion at the margins of one of the QRPs. The scheme was reviewed twice by Haringey's Quality Review Panel (QRP), as a full panel and subsequent chairs review, the latter of which "found much to admire in the proposed design" with just a small number of suggested refinements, which are all now considered to have been successfully resolved or explained. The QRP also noted the importance of careful detailing for this development to be successful, and for the polite, understated architectural expression to be translated into a high-quality finished building appropriate for this prominent, highly visible, sensitive, heritage-surrounded site, avoiding subsequent "value-engineering" and other cheapening of the design. Materials and key details of the proposals should be secured by conditions, including balconies and their balustrades and soffits and the distinctive expression of the corner, which the QRP and officers note could benefit from an injection of creative decoration. As a whole, the proposals represent a huge improvement on the current site and a more than acceptable residential-led development of the site, securing employment and a public route across the site, providing an appropriate neighbour to precious significant heritage assets, and good quality homes.	

Stakeholder (LBH)	*Comments*	*Response*
Conservation Officer	<u>The site</u> The development site forms part of a wider site identified in the Local Plan as SA63 Site Allocation, and is located in a pivotal position to the north of Lordship Lane, where, it is largely surrounded to the north and east by the Bruce Castle and All Harrows Conservation Area, and to the west by the Peabody Cottages Conservation Area. Several statutory and locally listed buildings are in the vicinity of the SA63 site, including the Grade I Bruce Castle and also Grade I Tudor Tower. The area around the application site is characterised by unique and irreplaceable historic landmarks. Apart from the highly significant and prominent Bruce Castle complex to the east, the locally listed Elmhurst Public House (no. 129 Lordship Lane), to the south-east of the site, is one of Tottenham's most architecturally impressive pubs, and also acts as a local landmark. To the west part of Church Lane and just north of the development site, sits the locally listed no.14 Church Lane, now a nursery, and the last survivor of a group of three late-Georgian villas. The Peabody Cottages Conservation Area, to the west, and the locally listed Risley Avenue Primary School, to the north-west, illustrate important early 20th century development in the area. The Peabody Cottages Conservation Area encompasses an important example of a charitably funded suburban development of the early 20th century, built to provide new and affordable housing for working-class people. The wider context of the application site is characterised by Tottenham Cemetery Conservation Area which extends to the north of the Bruce Castle and All Harrows Conservation Area, while Towers Garden Conservation Area extends to the west of the Peabody Cottages Conservation Area.	Comments have been taken into account.

Stakeholder (LBH)	***Comments***	***Response***
	The application site currently hosts a mix of uses in the form of a garage and light industrial buildings and adjoins a petrol station to the north-west and an electricity substation to the south-east. <u>Principle of development</u> Overall, the area around the development site has a varied character, of high historic and architectural interest and excellently illustrates the development of this part of the Borough from the medieval to modern times. Within this heritage context, the only few, limited examples of buildings which do not contribute to or detract from the surrounding townscape are mainly concentrated within the development site or immediately adjacent to it as part of the wider SA63 site. These light industrial buildings are typically neutral or detracting due to their utilitarian appearance and character, however, their single-to-two storeys height mitigates their presence in the area. The electricity substation buildings which adjoin the development site, are not considered to detract from the surrounding area, however, the stark metal mesh fence surrounding the substation and the proliferation of unsightly security signs clash with the largely landscaped and architecturally positive qualities of the surrounding area. There is no objection in principle to the redevelopment of the site, as its crowded and low-quality buildings provide an opportunity to enhance the setting of the surrounding heritage assets. It is proposed to improve the permeability of the development site and create routes through the site with potential to connect to the Bruce Castle Park. It is also proposed to frame a new view through the proposed development to Bruce Castle. These elements of the proposals which would enhance the setting of the conservation areas and associated assets are welcome and supported in principle from conservation grounds.	

Stakeholder (LBH)	***Comments***	***Response***
	<u>Height, mass and scale</u> The proposed development would introduce a considerable change to the setting of a number of heritage assets, including the Bruce Castle and All Harrows Conservation Area, the Grade I Bruce Castle and Tudor Tower, the Peabody Cottages Conservation Area and the locally listed buildings along Church Lane, Lordship Lane and The Roundway. In order to assist with the understanding of the impact of the proposals, a number of views of the proposed development were discussed and provided by the applicant. The views show the proposed development in the context of the surrounding heritage assets and provide an indication of how the proposed development would fit within its surroundings. The height of the proposed development was reduced during the pre-application stages, particularly, the height of the corner facing onto Lordship Lane and the height of the buildings facing onto Church Lane. However, the proposed buildings along Lordship Lane and at parts along the Roundway would still rise two to three storeys higher than the established surrounding townscape. This jump in height, combined with the continuous mass and scale of the development, the lack of harmonious distribution of mass and the lack of sufficient articulation, would result, in parts, at a visually intrusive and overbearing development that detracts from the prominence and experience of the surrounding heritage assets. This is particularly evident in Views 1, 4 and 11. View 4 shows how the proposed new buildings along the Roundway would rise above the small-scale, traditionally proportioned cottages of the Peabody Cottages Conservation Area and would appear prominent and detract from the special interest of the conservation area. Views from and of Bruce Castle Park would also be affected as the proposed buildings, at parts, would rise above Bruce Castle and its Tudor Tower. This would detract to an extent	

Stakeholder (LBH)	***Comments***	***Response***
	from these landmark buildings which are currently the most prominent buildings in the area. It is also likely that additional height might be added to the proposed development with the potential addition of plant machinery and equipment on the roof of the existing buildings. It is therefore considered that the proposed height, mass and scale of the new buildings would be uncharacteristic of the area and would detract from the surrounding, historically and architecturally important buildings and areas. <u>Architecture</u> Within this very sensitive, historically and architecturally rich heritage context, it is expected that any new development should be inspired by the surrounding heritage assets and reflect good examples of architecture while creating a contemporary development of the highest quality. The proposed development was designed to be polite and unobtrusive, however, it fails to, appropriately and sufficiently, address the surrounding heritage assets and protected townscape. The architectural language and detailing of the proposed development are not considered to appropriately address the heritage constraints of the site. It is not considered to be sufficiently site specific and misses the opportunity to enhance the area and to contribute to local distinctiveness. <u>Summary</u> Based on the reasons explained above, due to the height, mass and scale of the proposed development but also the proposed architectural language and detailing, it is considered that the proposal would detract from the surrounding built historic environment, particularly the Bruce Castle Conservation Area, the Bruce Castle and Tudor Tower and the Peabody Cottages Conservation Area. On balance, the harm that	

Stakeholder (LBH)	***Comments***	***Response***
	would be caused to the built historic environment is considered to be towards the moderate level of the less than substantial harm scale.	
Housing Officer	From the perspective of our existing housing strategy, we are broadly supportive of the fact that the low-cost rental homes are for London Affordable Rent – although the Council has an explicit preference for low cost rented homes to be let at Social Rent with rents at target rent levels, we accept London Affordable Rent. However, I would point out that London Affordable Rent is only available as a tenure if the scheme gets on site by March 2023. Otherwise these will need to be priced as Social Rent. Although we would prefer more two bedroom than one bedroom units, we are also supportive of the fact that by providing 50% of the LAR homes with three bedrooms, the scheme is broadly in line with our target dwelling mix for Social Rent/LAR. Our targets are that 10% of Social Rent/LAR homes have one bedroom, 45% two bedrooms, and 45% three bedroom or more homes (10% having four bed or more).	Comments have been taken into account.
Transportation Officer	I have reviewed the Transport Assessment and accompanying planning documents (Residential Travel Plan, Workplace Travel Plan Statement and Outline Delivery and Servicing Plan). As discussed previously, **I object to the proposed development on transport grounds** due to the applicant's on-street parking proposals and highway safety issues that they pose. I have set out my comprehensive comments below. As the scheme currently stands, I cannot recommend any planning conditions or s.106 planning obligations as they could not make the development proposals any more acceptable.	Comments have been taken into account. Objections are addressed in main body of the report. Conditions and planning obligations will be attached to the recommendation.

Stakeholder (LBH)	*Comments*	*Response*
	Transport Assessment <u>Development Proposals</u> The proposed development is for the demolition of the existing uses (various buildings and yards on a brownfield former employment site) and the construction of 76 residential dwellings as well as 608sqm GEA of flexible Class E uses with associated public realm improvements. Of the 608sqm, 330sqm would be dedicated to a convenience food store and 278sqm to workspace. The existing site contains a number of B2 general industrial units which are either occupied (12 Church Lane and 313 The Roundway) or vacant (315 The Roundway and Southern Workshops accessed from the Roundway and Church Lane). <u>Public Transport Accessibility Level (PTAL)</u> The site's PTAL ranges from 3 to 5, with the majority of the site having a PTAL of 5, denoting a very good connectivity.	

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	<u>Proposed Delivery and Servicing Vehicle Access</u> Delivery and servicing activity is proposed to be undertaken from 2 loading bays: - A 12m inset loading bay on the Roundway that would be 3.7m wide and capable of accommodating a waste collection vehicle or a 10m long rigid vehicle. - A 12m long loading bay on Church Lane that would be 2.7m wide, this is detailed as requiring 3m length of clear space at both ends of it, therefore requiring 18m total length. It is detailed that this will be capable of accommodating a waste collection vehicle and a 10m long rigid vehicle as well. The principle of the loading bay on the Roundway as shown in the drawings and described in the Transport Assessment is acceptable. Loading from Church Lane will be necessary, however given the low levels of delivery and servicing activity associated with the residential component of the development (5 arrivals/departures a day), it is required that the on street arrangements for loading be revisited within the context of all other considerations for Church Lane such as on street parking and the contraflow cycle arrangements.	

Stakeholder (LBH)	***Comments***	***Response***
	<u>Proposed Accessible Car Parking; Absence of Car-Capped Agreement</u> Although the site's PTAL ranges from 3 to 5, the highest PTAL has been considered when applying the relevant car parking standards, in line with Paragraph 10.6.4 of the London Plan (2021): *"When calculating general parking provision within the relevant standards, the starting point for discussions should be the highest existing or planned PTAL at the site (…)"* The site is also located within the Tottenham Event Day Controlled Parking Zone (CPZ) operating on event days only (Monday-Friday, 17:00-20:30 and Saturday, Sunday and public holidays, 12:00-20:00). The existing event day controls do not deter on-street parking the rest of the time. The proposed development will need to make provision for wheelchair-accessible car parking, in line with the relevant standards. In accordance with Policy DM32: Parking of the Development Management DPD, the proposed development would theoretically qualify for a car-capped status (the part of the site with lower connectivity is immediately adjacent to areas of PTAL 4; London Plan paragraph 10.6.4 also states that *"the starting point for discussions should be the highest existing or planned PTAL at the site"*). However, because of the infrequency of the local CPZ controls, we cannot recommend that the proposed development be made car-capped as placing	

Stakeholder (LBH)	***Comments***	***Response***
	restrictions on future occupiers would be totally ineffective and the restrictions themselves very easily circumvented. The applicant proposes to accommodate a total of 4 wheelchair-accessible car parking spaces, equating to a provision for 5% of the 76 proposed units having access to a parking space from the outset. These spaces would be partially inset along the western side of Church Lane (along the eastern boundary of the site) so that they could achieve the desired standard on-street accessible parking bay dimensions of 2.7m in width and 6.6m in length each. No other parking serving the site is proposed. As the transport consultant assumed that the proposed development would be made car-capped, no further assessment was undertaken to determine the likely impact of the car parking demand generated by the development proposals upon local streets. In order to estimate car ownership levels, Nomisweb table *LC4415EW – Accommodation type by car or van availability by number of usual residents aged 17 or over in household* has been extracted for both the 2011 Super Output Areas E01002095 Haringey 006D (Lower Layer) and E02000402 Haringey 006 (Middle Layer). Analysis shows that 76 units would likely generate parking demand for up to 32-33 cars. The impact upon local streets is assessed in the <u>On-Street Parking Stress Survey Analysis</u> section further below.	

Stakeholder (LBH)	***Comments***	***Response***
	It is therefore considered that the application under considers the likely on street parking demands that could materialise. The absence of daytime and night time restrictions on most days means that additional parking will materialise most likely on Church Lane from the residential units. A proportion of occupiers of the 76 units will be likely to require a car for their employment or family needs so it is fully expected that additional on street demands will arise. The applicant has not considered any new demands beyond those from the accessible units. Nor have they considered the provision of a car club facility to mitigate increased parking demands on street. <u>Acceptability of the Car Parking Proposals</u> Whilst this initial on street provision is in excess of the London Plan (2021) minimum accessible car parking standards (3%), the proposed location for the accessible bays is not acceptable. Despite pre-application consultations during which we, the Council's transport planning team, explained that relying on the public highway to deliver accessible parking spaces serving the site was not going to be supported, the applicant has chosen not to take account of our feedback and proceeded with an all on-street parking solution.	

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	Any on street bays are not able to be allocated to the occupiers of the wheelchair accessible units within the development as they are in the public highway and therefore available to any blue badge holder. Policy T6.1 of the London Plan requires that disabled parking provided by a development is only to be for use of the residents of that development. On street bays do not provide such a facility so as proposed the development does not meet the requirements of the London Plan. The reliance upon on-street parking to serve the proposed development is contrary to a number of National Planning Policy Framework (NPPF) and London Plan policies, due to its consequences on the local transport networks. The reasons are further explained below: - There is sufficient space on site to accommodate up to 5 accessible parking spaces, as the transport consultant has clearly illustrated in Appendix I of the Transport Assessment, despite labelling this design option ‘not feasible’. Swept path analysis has been undertaken and shows that vehicles would be able to access the site from Church Lane, and manoeuvre in and out of spaces before exiting onto Church Lane using the same crossover point. The obvious	

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	advantage of this solution is the possibility of accommodating up to one extra space and therefore increase the total initial provision from 5% to 7%. - Paragraphs 110 and 112 of the NPPF respectively state that *"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that (…) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree"* and *"applications for development should (…) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas".* - Paragraph 111 of the NPPF says that *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."* - London Plan Policy T3 Transport Capacity, Connectivity and Safeguarding states that *"Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's*	

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	needs, including by (…) safeguarding London's walking and cycling networks. (…) Those that do not, or which otherwise seek to remove vital transport functions or prevent necessary expansion of these, without suitable alternative provision being made to the satisfaction of transport authorities and service providers, should be refused." - London Plan Policy T4 Assessing and Mitigating Transport Impacts states that *"Development proposals should not increase road danger"*. - Cycleway 1 is a strategic cycle route which would be adversely affected by the proposals. Indeed, the existing layout with a few on-street parking bays and two long stretches of single yellow lines and several crossovers on the western side of the road offers multiple passing places for cyclists travelling northbound (totalling 30 linear metres of single yellow lines along the application site's eastern boundary) in what is effectively a contra-flow lane. - The proposed additional on-street parking would pose serious highway safety issues to cyclists travelling northbound, as it would remove most of the passing places and increase collision risks between cyclists travelling northbound and vehicles travelling in the opposite direction. As commented earlier in this	

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	response, the potential amounts of new on street parking would further compromise any spare space along Church Lane as parking demands are expected to be higher than the applicant proposes. - The applicant has provided a stage 1 safety audit of Church Lane, carried out, it is understood, for TfL. This comments that there are no safety concerns with regards the cycle facility, however, this is based on the levels of on street parking envisaged by the applicant which is considered by Haringey to be an under estimate. - As such, it is considered that the proposed development fails to meet the objectives of the NPPF in that respect, does not comply with London Plan policy and worsen the cycling conditions on Church Lane which it should strive to safeguard at the very least. Highway safety for cyclists would be deteriorated, which is all the more unacceptable as Cycleway 1 is of strategic importance. - As submitted, the application is also contrary to Haringey's Walking and Cycling Action plan which seeks improvements to walking and cycling facilities in the Borough. The Plan requires new development to deliver the aspirations of the	

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	plan, and support active travel modes. New development is expected to improve conditions for walking and cycling, not degrade them. - - Highway safety trumps any other considerations put forward by the transport consultant on behalf of the applicant. <u>On this basis, we can only recommend that the proposed development be refused on transport grounds</u>. The applicant uses the example of the Bernard Works scheme as an example where on-street accessible parking bays serving the proposed development were accepted by the Council. However, the circumstances under which on-street parking was accepted in that case were very different. The difference between both schemes is that the on-street accessible parking for Bernard Works is entirely new provision and an addition to the local CPZ (on new highway land), therefore not detrimental to the local on-street parking stock or existing highway safety. Under the applicant's current proposals for the Roundway, there would be a net loss of 3 permit-holder parking spaces, which would be replaced by accessible parking only benefitting future eligible residents and generally a much smaller group of people in the local community.	

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	The transport consultant states that accommodating all spaces on site would require the retention/reprovision of a crossover, resulting in the loss of 4 on-street parking spaces due to the required sight lines (at 20mph x = 2.4m, y = 25m). This may be correct based on a strict textbook approach based on Manual for Streets, but I would question this as the existing crossovers along Church Lane do not require such extensive sight lines (the visibility for vehicles coming out of the existing northernmost crossover is not impeded by the on-street parking bays situated on both sides). Paragraph 7.8.5 of Manual for Streets states that *"Parking in visibility splays in built-up areas is quite common, yet it does not appear to create significant problems in practice. Ideally, defined parking bays should be provided outside the visibility splay. However, in some circumstances, where speeds are low, some encroachment may be acceptable."* Therefore, retaining all parking to the north of the new crossover would not diminish the visibility of oncoming vehicles travelling southbound. No vehicles would travel northbound, only cyclists in the contraflow lane and travelling southbound, and the visibility of oncoming cyclists to the south would equally still be achieved without removing any further space (other than one space to give way to a time-limited loading bay. We are of the view that the on-site parking solution would cause the loss of one on-street space only along Church Lane, a minor inconvenience.	

Stakeholder (LBH)	***Comments***	***Response***
	It is stated the new vehicle crossover would interfere with pedestrian movement on the western footway on Church Lane, however two of the three existing crossovers would still be removed and reinstated as footway, therefore the future situation in that scenario would still be a significant improvement over the existing situation. As commented earlier, the proposed 18m length of loading bay proposed for within Church Lane is likely to result in unauthorised parking taking place, given its relative/expected lack of use for loading, and the pressures of new on street parking demands. The applicant needs to reconsider the most appropriate loading arrangements taking these issues into account. <u>Proposed Pedestrian Access</u> Pedestrian access would be gained from the Roundway and Church Lane. An east-west route through the site is proposed, which would improve local permeability. The width of the passage at the eastern end is not specified on the plans. This matter was raised at pre-application stage and we requested a minimum width of 2m in that location to ensure pedestrians could benefit from a minimum acceptable footpath width across the whole development, including in that pinch-point location.	

Stakeholder (LBH)	***Comments***	***Response***
	<u>Church Lane and proposed Wider Public Realm Improvements</u> Based on the earlier comments in this response, Transportation considers that the arrangement and environment along Church Lane needs to be reconsidered and revisited, to ensure that the cycling facility is improved/maintained and certainly not worsened as a result of the impacts and additional parking and loading demands generated by this development. to take into account a likely uplift in on street parking demands, provision of an appropriate/more efficient loading arrangement, and In addition to revised arrangements within Church Lane, any proposed enhancements and amendments to the public highway (namely footways and crossovers) would be covered by a s.278 agreement. We expect footway widths to be reprovided on a like-for-like basis, unless the current width is under 2m, in which case we would want to see that width increased to meet that minimum width of 2m. Overall, the applicant must acknowledge that signing and implementation of a S278 Agreement is dependent on the Highway Authority being satisfied and supportive of any changes to the on highway arrangements associated with the implementation of this development. <u>Proposed Cycle Parking and Access</u>	

Stakeholder (LBH)	***Comments***	***Response***
	Cycle parking is proposed in line with the London Plan (2021) minimum cycle parking standards, and the provision for the proposed flexible Class E use has been calculated on the basis of the most onerous standards in that class, namely B1 office standard for the long-stay cycle parking quantum and A2-A5 standard for the short-stay cycle parking provision. This approach is supported. It is noted that there would be a total of 3 residential long-stay cycle stores, and the proportion of such spaces to be in the form of two-tier racks would be 69%, with Sheffield stands representing 31%. This breakdown is in line with the advice given at pre-application stage which is that the total amount of long-stay spaces as Sheffield stands should be at least 25%, for accessibility issues. The required minimum provision of 5% of all long-stay cycle parking spaces for larger cycles is not explicitly shown in either the Transport Assessment or on the drawings. The proposed Class E floorspace would benefit from separate cycle stores within the units. Short-stay parking would be located within the site's public realm, with stands accessible from the Roundway and Church Lane. The ground-floor plan shows that three sets of doors would need to be passed through in order to get to the cycle store 02, which is contrary to the principle set out in the	

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	London Cycling Design Standards. This was flagged up as an issue during pre-application discussions but it appears that the issue has not been addressed. The adequacy of the long-stay and short-stay cycle parking and access arrangements would be normally 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. <u>On-Street Parking Stress Survey Analysis</u> A parking stress survey following the Lambeth methodology for residential and commercial developments was undertaken on neutral weekdays in December 2021. Both the 5m and 6m parking bay lengths were considered, in accordance with the methodology and also at the Council's transport planning officer's request (to reflect driver parking behaviour in the borough). The results indicate that: - On Church Lane, the overnight parking stress levels ranged from 17% to 26% with a 5m bay length, and from 20% to 30% with a 6m bay length.	

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	- On all surrounding streets within the surveyed area (200m walking radius of the site), the overnight parking stress levels ranged from 61% to 63% with a 5m bay length, and from 74% to 77% with a 6m bay length. Great variations in on-street parking occupancy were highlighted by the survey, with some streets experiencing extremely high stress (especially All Hallows Road, Broadwater Road and Mount Pleasant Road). However, overall, the average surveyed stress levels remained below 85% occupancy beyond which it becomes increasingly difficult for drivers to find a suitable space to park in. - The daytime parking stress surveys show that Church Lane experienced a maximum stress level of 73% at 9:00 (based on a 5m bay length). When considering all streets within 500m walking distance of the site, the daytime parking stress levels do not exceed 66% and 78%, based on 5m and 6m bay lengths respectively. It has been established that the proposed development would generate parking demand for 32-33 cars. With a 5m bay length, the average parking stress would increase to up to 72% overnight. With a 6m bay length, the average parking stress would therefore increase to up to 89% overnight. Considering an average bay length of 5.5m, the average parking stress would likely be in the region of 81%.	

Stakeholder (LBH)	***Comments***	***Response***
	In the daytime, with a 5m bay length, the maximum parking stress at 21:00 would go from 66% to 68%. With a 6m bay length, the maximum parking stress reached at 21:00 would be pushed from 78% to 81%. Considering an average bay length of 5.5m, the average parking stress would likely be in the region of 75%. In addition to resident parking, the proposed development would also likely generate parking demand arising from visitors to the site. Both overnight and daytime surveys show that any parking generated by the proposed development could be accommodated within its vicinity without exceeding the 85% occupancy threshold. However, when considering the proposed arrangements within Church Lane, the highest parking levels recorded were 27 vehicles parked out of 37 spaces. The development arrangement proposes provision of 4 blue badge bays, plus the 18m long loading bay, and in order to accommodate these, 3 standard on street CPZ bays would be lost.	

Stakeholder (LBH)	***Comments***	***Response***
	Taking current daytime parking levels at the busiest time, this would suggest 7 spaces would remain based on the parking survey. As commented earlier it is considered that the potential parking demands arising from the residential component of this development have been under considered and therefore given the absence of formal parking controls most of the time it is likely that additional parking will take place within Church Lane thus reducing considerably opportunity for cyclists to find refuse along the road when vehicles are passing along. <u>Proposed Waste Strategy</u> On the Roundway, ahead of waste collection times, the on-site facilities management team would take the bins from the residential waste stores to a temporary bin holding location. Waste operatives would then pull the bins to the rear of the waste collection vehicle, with a pull distance no greater than 10m (4.5m). Waste operatives would then return them to the holding location and the on-site team would subsequently take them back to the stores. This strategy has been agreed with the Council's waste officer and is therefore supported.	

Stakeholder (LBH)	*Comments*	*Response*
	On Church Lane, a small departure from the 10m pull distance has been agreed with the waste officer, with a 14m distance to the rear of the waste collection vehicle to be parked in the proposed on-street loading bay. Commercial waste would be collected by private operators. Non-residential bins would be stored in a dedicated store. <u>Active Travel Zone Assessment</u> An Active Travel Zone (ATZ) assessment was carried out in December 2021. Four routes were assessed, along which issues with the existing infrastructure were identified and are summarised below: • **Route 1 – Route to Lordship Recreation Ground** Footway cluttered with on-footway cycle lanes, bollards, street furniture and guardrails east of the junction of Lordship Lane with Bennington Road, which increases the chance of pedestrian and cyclist conflict. • **Route 2 – Route to Assunnah Islamic Centre** Narrow and cluttered footways at the Bruce Grove/High Road junction. The mini-roundabout (Lordship Lane/Bruce Grove) east of the site is difficult for	

Stakeholder (LBH)	*Comments*	*Response*
	pedestrians to navigate due to the lack of pedestrian crossing facilities and the lack of signals at the pedestrian central refuge crossing to the west of the mini-roundabout. • **Route 3 – Route to Haringey Sixth Form College / White Hart Lane Station** No issues identified. • **Route 4 – Route to Risley Avenue Primary School** The pedestrian crossing over All Hallows Road is on a bend and not signalised. <u>Multimodal Trip Generation Analysis</u> The existing trip generation assessment is based on the two occupied units (12 Church Lane vehicle servicing unit and 313 The Roundway tyre repair unit) whereas the vacant units have been dismissed, as they have not been in use for quite some time. Only vehicle trips have been estimated as they dominate any other modes due to the very nature of the existing land uses. The proposed residential trip generation assessment is accepted; as we disagree with the proposed accessible parking provision associated with the site, we believe the	

Stakeholder (LBH)	***Comments***	***Response***
	proposed car driver mode share largely underestimates the likely number of car trips generated by the proposed development. The proposed use class E trip generation assessment has been undertaken on the worst-case basis that the corresponding floorspace would be for office use, giving rise to more trips than any other Class E use such as retail, for example. This is considered robust and, in actuality, the proposed non-residential floorspace would probably attract linked and pass-by trips, thus generating very few additional trips. Whilst the methodology used to assess the proposed commercial multimodal trips is generally acceptable, the modal split could have been derived from Nomisweb table *WP7103EW - Workplace and usual residence by method of travel to work (2001 specification) (Workplace population)* to obtain more local data, as 2011 workplace zones are smaller than Middle-Layer Super Output Areas (MSOAs) and therefore provide more accurate mode shares. The modal split derived from Nomisweb table*WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)* is less accurate as it reflects data gathered for MSOA Haringey 006 which is a larger area than Workplace Zone E33034019. The net multimodal trip generation analysis shows that the proposed development would result in a decrease in vehicle trips, as expected, and an increase in all other	

Stakeholder (LBH)	***Comments***	***Response***
	modes. Due to the disagreement we have in relation to the proposed parking provision, we consider than the decrease would actually be less than predicted in the Transport Assessment, however the general conclusion would remain the same. The biggest impact on local transport networks is predicted to be on bus and London Underground and Overground services. <u>Delivery and Servicing Trip Generation Analysis</u> Whilst the usefulness of Steer's in-house delivery and servicing trip rate database is not questioned, it is difficult to approve trip rates (and surveys upon which they are based) which cannot be freely consulted. Therefore, the transport consultant should have undertaken a comparison with trip rates extracted from the TRICS database to justify the soundness and adequacy of the use of the in-house trip rates. A sensitivity test has been undertaken where all non-residential uses would be for food retail use, which would constitute a worst-case scenario. The minimum loading bay requirements as calculated from the proposed trip rates would be for 2 bays, taking account of the aforementioned worst-case scenario. Only the predicted AM and PM network peak-hour demands are set out; however, it is standard to present the delivery and servicing peak-hour demand (which usually differs	

Stakeholder (LBH)	***Comments***	***Response***
	from that of either the AM or PM peak hour) in order to calculate minimum loading bay requirements. Notwithstanding the above, it appears that the predicted delivery and servicing needs of the proposed development would be met by 2 on-street loading bays, respectively on the Roundway and Church Lane. <u>Impact on Highway network and junction capacities</u> As discussed earlier, the proposed development would generate a reduction in trips, therefore no further assessment of local junction capacity has been undertaken. <u>Impact on Local Public Transport Services</u> Likewise, the impact on local public transport services is not considered material and they would have sufficient capacity to accommodate the additional trips identified in the local assessment. <u>Borough Impact Assessment and Mitigation</u> It is explained that the introduction of the proposed inset loading bay on the Roundway would be subject to a combined Stage 1/2 Road Safety Audit (RSA) to be secured by planning condition. This is welcome. However, the proposed Roundway loading bay is	

Stakeholder (LBH)	*Comments*	*Response*
	less controversial than the proposed loading bay along with the proposed accessible parking provision on Church Lane, especially in relation to Cycleway 1; the proposed parking arrangements on Church Lane should have been accompanied with a Stage 1 RSA at planning stage. **Residential Travel Plan** The document is acceptable. The Residential Travel Plan in its interim/pre-occupation and full/occupation versions would be secured by s.106 planning obligation with monitoring contributions, were the scheme deemed acceptable. **Workplace Travel Plan Statement** The document is acceptable. The Workplace Travel Plan Statement would be further developed into interim/pre-occupation and full/occupation versions to be secured by s.106 planning obligation, if the scheme were deemed acceptable. **Outline Delivery and Servicing Plan** The document is acceptable. The Delivery and Servicing Plan in its interim/pre-occupation and detailed/full/occupation versions would be secured by planning	

Stakeholder (LBH)	***Comments***	***Response***
	conditions and its monitoring would be closely linked with that of the Residential Travel Plan, were the scheme deemed acceptable. **Outline Construction Logistics Plan** It is very disappointing that no Outline Construction Logistics Plan has been submitted as part of the planning application, which is part of the standard planning documentation expected from major applications referable to the Mayor of London. It is noted that the transport consultant has proposed that a Detailed Construction Logistics Plan be conditioned. **<u>Conclusion</u>** As submitted, transportation are unable to support this application. The potential highway safety impacts on the cycling facility along Church Lane have not been fully explored and assessed, the likelihood of potential additional on street parking has not been fully considered, nor have the optimum arrangements for loading and servicing been achieved. Any new development should look to improve walking and cycling facilities within the Borough not degrade them.	

Stakeholder (LBH)	***Comments***	***Response***
	In addition to the above, the applicant has not proposed satisfactory arrangements for blue badge parking for the accessible units, at present London Plan requirements are not met. Overall, it is considered the applicant has under considered the quantum of parking that will be generated by the residential component of the development, given formal parking restrictions are not in place most of the time. Provision of a car club facility could reduce these. The applicant needs to revisit the proposed arrangements with respect to these components of the development proposal and agree appropriate arrangements with Transportation and Highways officers to ensure a successful S278 Agreement and process. If Planning colleagues/planning committee are however minded to grant consent for this application, then taking the transportation objections to the application into account, the following pre commencement conditions should be imposed; • Blue badge/accessible unit parking – the applicant must meet the London Plan requirements for blue badge parking detailed within policy T6.1.	

<table>
<tr><th>Stakeholder (LBH)</th><th>Comments</th><th>Response</th></tr>
<tr><td></td><td>Reason - to provide appropriate designated disabled parking for resident’s use only.

• Church Lane Highway arrangements – the applicant must consult and liaise with transportation and highways officers to agree a design for the highway layout along Church Lane

Reason - to provide a safe highway environment for cyclists, other highway users and to accommodate loading activity, all to accord with Haringey’s Walking and Cycling Action Plan.</td><td></td></tr>
<tr><td>Carbon Management Officer</td><td>
<table>
<tr><td colspan="2"></td><td>Our ref: HGY/2022/0967
Contact: Christopher Smith

Date: 22/09/2022</td></tr>
<tr><td colspan="3">Town and Country Act 1990 (As amended)</td></tr>
<tr><td>Location:</td><td colspan="2">313 The Roundway and 8-12 Church Lane London N17 7AB</td></tr>
<tr><td>Proposal:</td><td colspan="2">Demolition of existing buildings and erection of a three to five storey building with new Class E floorspace at ground floor and residential C3 units with landscaping and associated works.</td></tr>
</table>
</td><td>Comments have been taken into account. The recommended conditions and planning obligations will be secured as appropriate.</td></tr>
</table>

Stakeholder (LBH)	*Comments*	*Response*
	Carbon Management Response 19/07/2022 In preparing this consultation response, we have reviewed: • Energy Strategy prepared by AJ Energy Consultants (dated 25 March 2022, Rev 2) • Overheating Assessment prepared by AJ Energy Consultants (dated 28 March 2022, Rev 2) • Preliminary BREEAM Report prepared by AJ Energy Consultants (dated 18 March 2022, Rev 1) • Relevant supporting documents. **1. Summary** The development achieves a reduction of 60% carbon dioxide emissions on site, which is supported in principle. The overheating strategy is not currently compliant and further work needs to be done to demonstrate it complies. Some clarifications and further detail must be provided with regard to the energy and sustainability strategies. Appropriate planning conditions will be recommended once this information has been provided. **2. Energy – Overall** 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. The overall predicted reduction in CO_2 emissions for the development shows an improvement of approximately 60% 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 48.8 tonnes of CO_2 from a baseline of 80.7 tCO_2/year.	

Stakeholder (LBH)	*Comments*	*Response*
	London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. No unregulated emissions have been noted.	

Residential (SAP10 emission factors)

	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2013 baseline	73.63		
Be Lean	53.64	19.99	27.2%
Be Clean	53.64	0	0%
Be Green	32.05	21.59	29.3%
Cumulative savings		41.58	56.5%
Carbon shortfall to offset (tCO_2)	32.05		

Non-Residential (SAP10 emission factors)

	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2013 baseline	7.11		
Be Lean	5.05	2.06	29%

Stakeholder (LBH)	Comments	Response

Be Clean	5.05	0	0%
Be Green	-0.06	6.11	71.8%
Cumulative savings		7.17	100.8%
Carbon shortfall to offset (tCO_2)	None		

Site-Wide (SAP10 emission factors)

	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2013 baseline	80.74		
Be Lean	58.69	22.05	27.3%
Be Clean	58.69	0	0%
Be Green	31.99	27.7	34.3%
Cumulative savings		48.75	60.4%
Carbon shortfall to offset (tCO_2)	31.99		
Carbon offset contribution	£95 x 30 years x 31.99 tCO_2/year = £91,171.50		
10% management fee	£9,117		

Actions:

- Please submit the content of the appendices included within the Energy Strategy (can be submitted as a separate document).

<table>
<tr><th>Stakeholder (LBH)</th><th>Comments</th><th>Response</th></tr>
<tr><td></td><td>
- What are the modelled unregulated emissions?

Energy – Lean
The applicant has proposed a saving of 22.05 tCO_2 in carbon emissions (21% resi / 27% non-resi) through improved energy efficiency standards in key elements of the build, with SAP2012 carbon factors. This goes beyond the minimum 10% and 15% reduction respectively set in London Plan Policy SI2, so this is supported.

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

<table>
<tr><th></th><th>Residential</th><th>Non-residential</th></tr>
<tr><td>Floor u-value</td><td colspan="2">0.12 W/m^{2}K</td></tr>
<tr><td>External wall u-value</td><td colspan="2">0.18 W/m^{2}K</td></tr>
<tr><td>Roof u-value</td><td colspan="2">0.14 W/m^{2}K</td></tr>
<tr><td>Door u-value</td><td>1.20 W/m^{2}K</td><td></td></tr>
<tr><td>Window u-value</td><td colspan="2">1.20 W/m^{2}K</td></tr>
<tr><td>G-value</td><td>0.35</td><td></td></tr>
<tr><td>Air permeability rate</td><td>3 m^3/hm^2 @ 50Pa</td><td>5 m^3/hm^2 @ 50Pa</td></tr>
<tr><td>Ventilation strategy</td><td>Mechanical ventilation with heat recovery (MVHR 76.5% efficiency; 0.50 W/l/s (one bathroom) – 0.53 W/l/s (two bathrooms Specific Fan Power)</td><td>MVHR with 0.75 W/l/s/ SPF and 0.85 ventilation heat recovery
Fan coil unit SPF 0.15 W/l/s</td></tr>
<tr><td>Thermal bridging</td><td>Accredited Construction Details</td><td></td></tr>
<tr><td>Low energy lighting</td><td>100%</td><td>100 lm/W</td></tr>
<tr><td>Heating system (efficiency / emitter)</td><td>Individual gas boilers (Baseline/Be Lean)</td><td>96% efficient gas boiler and air cooled chiller system</td></tr>
</table>
</td><td></td></tr>
</table>

Stakeholder (LBH)	*Comments*	*Response*

Cooling	Proposed for Blocks A and B for living rooms and bedrooms (connected to MVHR)	
Space heating requirement	18.4 kWh/m^2/year	

Actions:

- Are the residential gas boilers individual or communal in the baseline/Be Lean scenario?
- What is the summary TFEE/DFEE improvement?
- What is the construction of building – frame/insulation. Thermal mass?
- Set out how the scheme's thermal bridging will be reduced.
- Please identify on a plan where the MVHR units will be located within the dwellings. The units should be less than 2m away from external walls.
- How is lighting energy demand improved? Should consider daylight control and occupancy sensors for communal areas.
- What is the proportion of glazed area? If not already designed to LETI recommendations, consider bringing this down to 10-20% (north), 10-15% (east + west), 20-25% south.
- The u-values of the walls can be brought down further, these are not very ambitious u-values.
- To model the energy demand for the active cooling. Then include these energy demands into the carbon footprint of the development and update any offsetting requirements based on this.

Overheating is dealt with in more detail below.

Energy – Clean

London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from

Stakeholder (LBH)	*Comments*	*Response*
	a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs. The development is within 500 meters of a planned future DEN, so the development is expected to secure connection subject to demonstration of technical feasibility and financial viability. The applicant is not proposing any Be Clean measures. The has considered that 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. Allowance for a future DEN plant in the ground floor of Blocks A and B has been included within the floor plans to facilitate connection to a future system. This has been sized based on the GLA's District Heating Manual. Ducting has been indicated as a dotted red line from the plant rooms to the edge of the site at the Roundway. The future-proofing infrastructure to allow for a potential connection in the future will be conditioned. Action: - Submit further detail on the ducting that would be proposed between the future plant areas and the edge of the site – would this be installed under the finished floor levels as part of the base build? **Energy – Green**	

<table>
<tr><th>Stakeholder (LBH)</th><th>Comments</th><th>Response</th></tr>
<tr><td></td><td>
As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.

The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 27.7 tCO_2 (34.3%) reduction of emissions are proposed under Be Green measures.

The total solar array peak output would be 35.52 kWp, which is estimated to produce around 29,394 kWh/year of renewable electricity per year, equivalent to a reduction of 6.9 tCO_2/year. The layout is included in Appendix A.

<table>
<tr><td>Block A</td><td>13.32 kWp; split:
9.62 kWp GF commercial unit
3.70 kWp residential landlord system</td><td>South-facing, 15-30° inclination</td><td>36x 370Wp panels</td></tr>
<tr><td>Block B</td><td>22.2 kWp; split:
8.14 kWp GF commercial unit
14.06 kWp residential landlord system</td><td>South-facing, 15-30° inclination</td><td>60x 370W panels</td></tr>
</table>

Hot water cylinders with integrated individual air-to-water ASHP systems are proposed for the residential dwellings, with ducting to the external facades. A seasonal efficiency of 3.36 has been assumed.

For the commercial units, a Variable Refrigerant Flow (VRF) air-to-air heat pump system is proposed.

<u>Actions:</u>
</td><td></td></tr>
</table>

Stakeholder (LBH)	*Comments*	*Response*
	- What roof area would be covered by the PV arrays? - Why is a communal heating system not proposed within this development? What feasibility work has been undertaken to show the advantages and disadvantages of the options? - Please identify on the plans where the air source heat pumps will be located and how the units will be mitigated in terms of visual and noise impact. - How much of the heating/hot water demand will be met by the proposed types of heat pumps? If this cannot be met fully, how will this be supplemented? **Energy – Be Seen** London Plan Policy SI2 requests all developments to 'be seen', to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies. The applicant is only proposing monitoring systems to review system outputs for the solar PV arrays. <u>Action</u>: - Please confirm that sub-metering will be implemented for residential and commercial units. - What are the unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters, battery storage? **3. Carbon Offset Contribution** A carbon shortfall of 31.99 tCO_2/year remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years.	

<table>
<tr><th>Stakeholder (LBH)</th><th>Comments</th><th>Response</th></tr>
<tr><td></td><td>

4. Overheating

London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled 57 habitable rooms, and 2 office spaces.

Due to the noise constraints of this site being located along The Roundway, the TM59 criteria for predominantly mechanically ventilated dwellings apply for Blocks A and B, assuming windows need to remain closed. (Another simulation was done with the windows being open in these blocks, and it was demonstrated that these rooms would pass if they could rely on natural ventilation. Results below are for these blocks assuming closed windows.)

Results are listed in the table below.

<table>
<tr><th></th><th></th><th>Number of habitable rooms pass TM59</th><th>Number of spaces pass TM52 (office)</th><th>Number of corridors pass</th></tr>
<tr><td>All blocks - including habitable rooms in Blocks A and B based</td><td>DSY1 2020s</td><td>41/57</td><td>2/2</td><td>Not modelled</td></tr>
</table>

</td><td></td></tr>
</table>

Stakeholder (LBH)	Comments	Response

on closed windows and no active cooling				
Blocks C and D only – assuming Blocks A and B pass with active cooling	DSY2 2020s	12/25	Not modelled	
	DSY3 2020s	11/25		
	DSY1 2050s	11/25		
	DSY1 2080s	7/25		

Passing current weather files
All residential rooms are noted to pass the overheating requirements for 2020s DSY1 (although not demonstrated in the results). In order to pass this, the following measures will be built:

- Natural ventilation for Blocks C and D, with openable areas of 90° for non-accessible windows, and security measures for accessible bedrooms (300mm)
- Glazing g-value of 0.35
- Retractable external blinds along southern elevations for bedrooms in single aspect units only
- External shading through deeper window reveals
- Internal blinds where required
- MVHR with summer bypass
- Cooling modules attached to MVHR in Blocks A and B for living rooms and bedrooms
- Building user guides.

Both office spaces pass based on closed windows due to the air quality and noise concerns. An active cooling system is proposed to improve internal thermal comfort levels and flexibility. The annual cooling demand would be 142.5 MJ/m^2, which is higher than the notional demand of 116.4 MJ/m^2.

Passing future weather files
Proposed future mitigation measures include:

Stakeholder (LBH)	***Comments***	***Response***

	- To be built as part of the development now, to allow for the installation of future retrofit measures:
	  o Switched fuse spur on the ceiling in the living and bedrooms to allow for future ceiling-mounted fans to be installed
	  o Reinforcement above suspended ceilings in this position to allow for future ceiling-mounted fans to be installed
	  o Future ventilation grilles through external walls from each bedroom to allow for the installation of an additional ventilation unit.
	- To be installed by the occupants, in discussion with building management:
	  o Ceiling-mounted fans
	- To be installed in cooperation with building management:
	  o Future window replacement to reduce solar gains
	  o Supplementary supply fan (e.g. Nuaire Dave supply air fan to increase air rates up to 18 air changes per hour)
	  o Active cooling for Blocks C and D, with minor alterations to the MVHR (with sufficient space provided)
	  o If required, building-wide cooling packages could be considered
	
	<u>Overheating Actions:</u>
	
	- **Weather files** - Redo the overheating modelling with the Central London weather file, which will more accurately represent the urban heat island effect, as requested as part of the pre-application advice. Please also confirm that the CIBSE TM49 Design summer years for London were used.
	- **Modelled areas** - Please also model a residential corridor per block, as required by CIBSE TM59.
	- The report notes that external shading *and* retractable external blinds are proposed. **External shading** - What specifications have been assumed for these two elements? What will the retractable shading look like? Why	

Stakeholder (LBH)	*Comments*	*Response*
	were retractable external blinds not considered for the eastern and western facades? - **Internal shading** - Where are internal blinds deemed 'where required'? what specification has been assumed for these? Are these required to pass the 2020s DSY1 weather file? - **Floor layouts** - Please include floor plans that indicate which homes/spaces were modelled (the images currently used are not easy to follow and do not include the internal layouts). - **Ventilation** - Confirm that natural ventilation is only proposed for Blocks C and D. - **Ventilation/security** -What secure by design measures have been included in the design to prevent the risk of crime to ground floor dwellings? 300mm restrictors may not be sufficient to pass Building Regulations Part O for accessible habitable rooms relying on natural ventilation. - **Blocks A and B:** o Please demonstrate what further mitigation measures were considered and tested to bring down the need for active cooling and the demand for cooling. o Please demonstrate with the modelled results that the DSY1 requirements are passed with the active cooling proposed. o Would windows be openable in Blocks A and B in practice? - **Office space** – please confirm the modelling was done without active cooling. What external shading features are proposed to reduce the cooling demand for these spaces, particularly considering the high amount of glazing? Could the amount of glazing be reduced to reduce solar gains? - **Cooling demand** - Can the residential and office cooling demand be modelled through the dynamic overheating software to present a more accurate figure in relation to the modelled temperatures? Please also	

Stakeholder (LBH)	*Comments*	*Response*
	confirm the efficiency of the equipment, whether the air is sourced from the coolest point / any renewable sources. - **Future mitigation** – The detail behind future mitigation measures and what will be built out to enable these measures is very helpful. Can the applicant please demonstrate how, e.g. the ceiling fans will improve the overheating results? **5. Sustainability** Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The Sustainability section in the DAS very briefly sets out proposed measures to improve the sustainability of the scheme, including microclimate, daylight and sunlight, air quality, acoustics and vibration, flood, biodiversity and arboricultural, and embodied carbon. ***Non-Domestic BREEAM Requirement*** Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable. The applicant has prepared a BREEAM Pre-Assessment Report for the commercial units. Based on this report, a score of 60.96% is expected to be achieved for both the commercial units in Block A and B, equivalent to 'Very Good' rating. No potential score including additional targets has been included. The assessment assumed an office use would occupy both spaces. <u>Actions:</u> - The assessment should demonstrate which potential credits will be targeted to aim for an Excellent rating, in line with policy. - The report needs to include justification where targets are not met or 'potential' credits.	

Stakeholder (LBH)	***Comments***	***Response***
	Living roofs All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. The development is proposing amenity living roofs in the development on Blocks C and D. The roof plan (Figure 96 in DAS and Appendix A in the Energy Statement) indicates a green living roof under the solar PV on top of Blocks A and B. It is assumed that this would be an extensive living roof. Both intensive amenity and extensive living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition. <u>Action</u>: - Please confirm/ensure that the roofs of Blocks A and B include extensive living roofs under the solar PV arrays to maximise the benefits of the roof space. ***Urban Greening / Biodiversity Net Gain*** All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's	

Stakeholder (LBH)	*Comments*	*Response*
	biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff. The development achieves an Urban Greening Factor of 0.40, which complies with the interim minimum target of 0.4 for predominantly residential developments in London Plan Policy G5. The biodiversity net gain 86.8% in habitat units (+0.36 units). ***Whole Life Carbon*** 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. The applicant has set the challenge to meet the RIBA 2030 Climate Challenge target for 2025, or 2030. Estimates with a carbon tool have indicated that CO2 reduction can be achieved through decrease of column sizes, reduction of slab thickness, allowing for tolerances to adjust the structure in future design, specification of 50% GGBS to reduce cement, recycling existing materials on site. ***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 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. No reference has been made to consider and integrate circular economy principles within the proposed development. The applicant is strongly encouraged to consider implementing circular economy	

Stakeholder (LBH)	***Comments***	***Response***
	principles, such as designing for disassembly and reuse. The applicant was advised to undertake a Pre-Demolition Survey to re-use materials from existing buildings. ***Climate Change Adaptation*** The pre-application advice requested that the sustainability strategy should set out a climate change adaptation strategy for residents and employees to help the area become more resilient against the impacts of climate change. This should include adaptation to increased risk of flooding and wind-based impacts from more frequent and severe storm events, longer periods of drought (in relation to the soft landscaping and limiting occupant water use), more intense and longer heatwaves. <u>Actions:</u> - Demonstrate how the site will improve the sustainability of the development through: o Using low-impact and low-embodied carbon materials and what demolition materials will be reused on site when deconstructing. o How the circular economy is promoted. o Details on the biodiversity benefits that this scheme will bring (green infrastructure, bird boxes, bat boxes etc to connect to the green spaces around the site) o Details on the EV charging points that will be delivered in the car park. o How water demand will be reduced o How surface water runoff will be reduced, that it will be separated from wastewater and not discharged into the sewer. o How the risk of surface water flooding to ground floor bedrooms and habitable spaces is reduced. o Climate change adaptation for internal and external spaces (shading, etc) and the impact of the increase in severity and frequency of weather events on the building structures. This should include identifying	

Stakeholder (LBH)	*Comments*	*Response*
	communal spaces (indoor and outdoor) where residents can cool down if their flats are overheating. **Planning Conditions** To be secured (with detailed wording TBC): - Energy strategy - Future DEN connection - Overheating (Residential + Non-Residential) - Overheating building user guides - BREEAM Certificate for each commercial unit - Living roof(s) - Biodiversity **Planning Obligations Heads of Terms** - Be Seen commitment to uploading energy data - Energy Plan and Sustainability Review - Estimated carbon offset contribution (and associated obligations) of £91,171.50 (indicative), plus a 10% management fee (based on £2,850 per tonne of carbon emissions) **Carbon Management Response 22/09/2022** In preparing this consultation response, we have reviewed: • Responses to Planning Carbon Queries 170822 • Appendix B Baseline TER Worksheets • Appendix C Energy Efficiency Worksheets • Appendix D Renewable Energy Worksheets	

Stakeholder (LBH)	*Comments*	*Response*
	Summary of responses The applicant provided a table of responses to the above actions. Notable updates include: **Energy** • The baseline for the residential units uses individual gas boilers. That would be acceptable if individual heat pumps were a justified heating solution. • TFEE of 43.20 and DFEE of 34.65, giving a 20% improvement. • Thermal bridging: psi-values calculated from similar projects, to be developed at detailed design stage. • Energy demand for cooling is included within the calculations. • Ducting between the plant areas and edge of the site would be installed under the floor as part of the base build; this detail would need to be investigated further at detailed design stage to ensure this is coordinated with other services. • Total roof area of 178.4 m^2 is currently estimated to be required for solar PVs. • No further justification was given for not progressing a communal heating system. • The residential individual ASHP units are proposed to be internal (60% of demand required for hot water; remaining space heating demand would be supplemented by responsive and controllable electric heating systems). Supplementing ASHP with direct electric heating is not supported unless Passivhaus dwellings are proposed. **Overheating** • Modelling was done with the London Weather Centre file. • Single aspect south-facing flats would have motorised awnings to provide external shading.	

Stakeholder (LBH)	*Comments*	*Response*
	• Internal blinds are used to pass the mandatory weather file; the applicant should note that this strategy will need to be amended to pass Building Regulations Part O. alternative external shading should be explored for the east and west facing facades (e.g. external roller shades, or moveable shutters on balconies for example). • It was identified from the modelling that it was the lack of openable windows rather than the design that created the need for active cooling for Blocks A and B. It wasn't considered appropriate to reduce glazing areas in these units, according to the applicant. However, all aspects contribute to the heat gains within flats and the lower the heat gains, the lower the cooling demand during the summer. • Security measures to allow for natural ventilation will be confirmed at detailed design stage. • Air quality and noise are still being considered in terms of whether windows might be open in practice for residents to choose. • Residential cooling demand is expected to be <0.6% of annual energy demand. **Be Clean Strategy** The applicant is not proposing a communal heating system, contrary to the pre-application advice provided. Since the pre-application advice, the Decentralised Energy Network (DEN) design has progressed further and it is considered that the development would not located far from Linley Road, where the DEN pipework is currently planned to be installed to connect various sites across Haringey. The site forms part of a relatively attractive cluster with other uses which could make it viable to connect and allow adjacent/nearby existing buildings to take the opportunity to connect as well. In particular, the Grade I listed Bruce Castle building would benefit from low-carbon heat due to limited expected opportunities to improve the fabric.	

Stakeholder (LBH)	***Comments***	***Response***
	The applicant should therefore, as a priority, explore a communal heating system for the residential units over individual heating solutions. This means the development should: 1. Comply with Haringey's heat network specifications; 2. Submit an Energy strategy which covers two scenarios (not connecting to DEN and connecting to DEN), explaining the decision points and how the applicant will delay expenditure on ASHP as far as possible; 3. Pay a carbon offset contribution based on the DEN connection scenario (initial offset contribution), and if not connecting to the DEN, a deferred offset contribution would be due (based on the low-carbon heating scenario contribution minus the initial offset contribution); a. If connecting to the DEN, a connection charge would be paid based on the avoided offset contribution plus avoided spend on ASHP system depending on the timing of connection. **Conclusion** The development can be supported, subject to the proposed wording of planning conditions listed below. **Planning Conditions** <u>*Energy strategy*</u> *The development hereby approved shall be constructed in accordance with the Energy Strategy prepared by AJ Energy Consultants (dated 25 March 2022, Rev 2) delivering a minimum 60% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, and a minimum 35.5 kWp solar photovoltaic (PV) array.*	

Stakeholder (LBH)	***Comments***	***Response***
	(a) Prior to above ground construction, the Energy Strategy shall be resubmitted 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;* - *Redesign of the heating strategy, prioritising a communal system with the ability to connect to a Decentralised Energy Network in the future and an alternative low-carbon heating solution.* - *Confirmation of the necessary fabric efficiencies to achieve a minimum 27% reduction in carbon emissions under Be Lean, including details to reduce thermal bridging, and how the average heating demand will be limited to 18.4 kWh/m^2/year and the cooling demand for Blocks A and B to 15 kWh/m^2/year;* - *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 fully annotated 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).* *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, evidence that the solar PV and ASHPs installation have been installed correctly shall be submitted to and approved by the*	

Stakeholder (LBH)	***Comments***	***Response***
	Local Planning Authority, including photographs of the solar array, a six-month energy generation statement, and a Microgeneration Certification Scheme certificate. *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.* *<u>Future DEN connection</u>* *Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:* - *Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g., value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);* - *Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.* - *Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;* - *A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;* - *Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection*	

Stakeholder (LBH)	***Comments***	***Response***
	is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts; - *Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;* - *Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;* - *Details of a future pipework route from the temporary boiler location to the plant room.* *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 SI3, and Local Plan (2017) Policies SP4 and DM22.* *<u>Energy Monitoring</u>* *No development shall take place beyond the superstructure of the development until a detailed scheme for energy monitoring has been submitted to and approved in writing by the Local Planning Authority. The details shall include details of suitable automatic meter reading devices for the monitoring of energy use and renewable/ low carbon energy generation. The monitoring mechanisms approved in the monitoring strategy shall be made available for use prior to the first occupation of each building and the monitored data for each block shall be submitted to the Local Planning Authority, at daily intervals for a period of 5 years from final completion.* *Within six months of first occupation of any dwellings, evidence shall be submitted in writing to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.*	

Stakeholder (LBH)	***Comments***	***Response***
	REASON: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2021 Policy SI 2 and Local Plan Policy SP4 before construction works prohibit compliance. *<u>Overheating (Residential)</u>* *Prior to the commencement of development, an overheating report shall be submitted to and approved by the Local Planning Authority to confirm the mitigation strategy following the detailed design stage. The model will assess the overheating risk in line with CIBSE TM59 (using the London Weather Centre TM49 weather DSY1 file for the 2020s) and demonstrate how the overheating risks have been mitigated and removed through design solutions and in line with Building Regulations Part O. These mitigation measures shall be operational prior to the first occupation of the development hereby approved and retained thereafter for the lifetime of the development.* *This report will include:* - *Details of the design measures incorporated within the scheme in line with the Cooling Hierarchy as set out in the Overheating Assessment prepared by AJ Energy Consultants (dated 28 March 2022, Rev 2) (including details of the feasibility of prioritising passive cooling and ventilation measures over active cooling) to ensure adaptation to higher temperatures are addressed, the spaces do not overheat, and the use of active cooling is reduced as far as possible for Blocks A and B;* - *Specification of the external awnings, cooling modules and any additional mitigation measures found necessary;* - *Appropriate design responses to mitigate risk of crime, and reduce exposure to air pollution and noise pollution in line with the AVO Residential Design Guide;* - *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.*	

Stakeholder (LBH)	***Comments***	***Response***
	Reason: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21. *<u>Overheating (Non-Residential)</u>* *At least six months prior to the occupation of each non-residential area, an Overheating Report must be submitted to and approved by the Local Planning Authority if that space is to be occupied for an extended period of time or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.* *The report shall be based on the current weather files for 2020s for the CIBSE TM49 central London dataset, with and without active cooling. It shall set out:* - *How the active cooling demand is reduced below the notional cooling demand, aiming for a cooling demand of below 15 kWh/m^2/year, prioritising passive design measures.* - *The modelled mitigation measures which will be delivered to ensure the development complies with DSY1 for the 2020s weather file.* *The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.* *REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.*	

Stakeholder (LBH)	***Comments***	***Response***
	<u>Overheating building user guides</u> *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 any residential occupants before they move in.* *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.* *<u>BREEAM Certificate</u>* *(a) Prior to commencement on site, a design stage accreditation certificate per commercial unit must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM "Very Good" outcome (or equivalent), aiming for "Excellent". This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site. The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.* *(b) Prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.* *In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be*	

Stakeholder (LBH)	***Comments***	***Response***
	implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions. *Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.* *<u>Living roof(s)</u>* *(a) Prior to the commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:* *i) A roof plan identifying where the living roofs will be located;* *ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);* *iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate* *iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m^2 of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m^2, 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/m^2) and density of plug plants planted (minimum 20/m^2 with roof ball of plugs 25m^3) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);*	

Stakeholder (LBH)	***Comments***	***Response***
	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 90% of the dwellings, evidence must be submitted to and approved by the Local Planning Authority that the living roof have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.* *Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.* *<u>Biodiversity</u>* *(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*	

Stakeholder (LBH)	***Comments***	***Response***
	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.*	
Regeneration Officer	Just following up on this. We are speaking to colleagues this afternoon after which diane and I should be able to revert. Can you give me a sense of the maximum floor space we might be talking about that could be attributed affordable? I note on the plans it talks about one space or another, depending on what is most viable but it would be helpful to understand parameters such as square feet and perhaps ceiling heights/amenities etc	Comments have been taken into account.
Nature Conservation Officer	Ecology The site currently has a very low ecological value being almost entirely hard standing. The expected ecological net gain from the proposals is estimated to be Within the boundary of the Application Site, the proposal is predicted to deliver a 86.8% (+0.36 units) gain in biodiversity Habitat Units. The application site incorporates extensive brown and green roofs on the podiums. The amenity areas propose a range of native and non-native plants to provide nectar for insects. In accordance with the ecology report, the landscaping provides for the	Comments have been taken into account. Appropriate conditions will be secured.

Stakeholder (LBH)	*Comments*	*Response*
	planting of habitats which will be of value to wildlife, such as: ▪ native seed/fruit bearing species. ▪ nectar-rich species to attract bees and butterflies. ▪ species which attract night-flying insects which will be of value to foraging bats, for example: evening primrose Oenothera biennis, goldenrod Solidago virguarea, honeysuckle Lonicera periclymenum and fleabane Pulicaria dysenterica. ▪ Provision of nesting/ roosting habitat, such as installation of nest boxes for species such as house sparrow, dense scrub, or native thicket for species such as song thrush, and bat boxes for species such as the common pipistrelle. ▪ Inclusion of hedgehog passes under any fence lines to allow connectivity between the site and the wider area. ▪ Creation of deadwood habitat for invertebrate species (e.g. stag beetle). An ecologist has been instructed to ensure that the emerging landscape proposals provide significant ecological enhancement. The aim of the landscape design is to increase the extent and variation in habitats within the site relative to the current baseline situation. Page 28 Ecology and Green Infrastructure – The existing site has little ecological value and therefore there is an opportunity to provide a net gain in biodiversity. The landscape and ecology proposals for the site include a number of play areas, native hedging and planting and a range of boxes for birds, lacewings, mason bees and other insects. In addition, the scheme will include a significant area of green roof. http://www.planningservices.haringey.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=1645131 Soft Landscape - Fifth Floor (Planting plan) Bauder BioSolarGreen Roof System or Extensive Green Roof to GRO cod	

Stakeholder (LBH)	***Comments***	***Response***
	Post development) maintenance plan to sustain and monitor quality, plant and flora species in order to deliver the suggested Standard time to target condition/years and UGF requirement. Conclusion All document and reports have been prepared to current good practice guidance covering relevant legislation and policy. The opportunities for ecological enhancement including mitigation measures should be set out in a Construction Environmental Management Plan & Landscape and Ecological Management Plan. To sustain and monitor quality, plant and flora species in order to deliver the suggested standard time to target condition/years and UGF requirement. As such, a Construction Environmental Management Plan & Landscape and Ecological Management Plan should be secured by condition and approved prior to construction.	
Tree Officer	I hold no objections to the proposal. A tree survey has been carried out by Sharon Hosegood Associates dated March 2022. The survey has been carried out to British Standard 5837 Trees in relation to design, demolition and construction- Recommendations 2012. I concur with the findings within the report and the tree quality classifications. Providing all sections of the report are adhered to, with emphasis on further enhanced ground protection at the ingress and egress, arboricultural method statements for all operations within the root protection areas, I hold no objections.	Comments have been taken into account. Appropriate conditions will be secured.

Stakeholder (LBH)	***Comments***	***Response***
	Drawings SHA 1391, SHA 1391 TPP11, & SHA 1391 TPP2 show the tree protection plans to be install prior to any development. There is a net gain of 20 trees and a comprehensive landscape plan. We will require a full planting specification, and a five-year aftercare management plan for the landscaping.	
Flood and Water Management Officer	Having reviewed the applicant's submitted Flood Risk Assessment and Drainage Statement report, reference number 4756-ROUN-ICS-XX-RP-C-07.001 dated 18th March 2022 prepared by Infrastruct CS Limited, we are generally content with the overall methodology as mentioned within the above documents, subject to following planning conditions relates to the Surface water Drainage Strategy and it's management and maintenance plan, which will need to be attached as a part of any consent on this planning application. **Surface Water Drainage condition** No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate that : i) The surface water generated by this development (For all the rainfall durations **starting from 15 min to 10080 min** and intensities up to and including the climate change adjusted critical 100 yr storm) can be accommodated and disposed of without discharging onto the highway and without increasing flood risk on or off-site.	Comments have been taken into account. Appropriate conditions will be secured.

Stakeholder (LBH)	***Comments***	***Response***
	ii) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method iii) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development. iv) The development shall not be occupied until the Sustainable Drainage Scheme for the site has been completed in accordance with the approved details and thereafter retained. **Reason : To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter.** **<u>Management and Maintenance condition</u>** Prior to occupation of the development hereby approved, a detailed management maintenance plan for the lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained. **REASON: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system**	

Stakeholder (LBH)	*Comments*	*Response*
Waste Management Officer	I've reviewed documents and the number of bins and the proportion allocated for food waste and recycling follow Haringey's guidance and meet the requirements for a development of this size. There is however reference to 360l bins to be used for food waste but due to H&S concerns, this size container is no longer provided for this waste stream and we now provide 1 x 140l bin per 10 dwellings/flats. The frequency of collection is referenced as being a maximum of twice weekly for refuse and recycling, with food waste being collected weekly. It is noted that on collection day the facilities management will transfer residential bins to the temporary bin holding area. Also noted is that in para. 3.54 of The Roundway – Transport Assessment document, the residential refuse from the Block C and D bin store will be collected from the loading bay on Church Lane. The wheeling distance in this location is 14m (more than the 10m guidance) due to the need to set the building back to address LBH heritage comments and that LBH Waste Officers have confirmed that this distance is acceptable during pre-application scoping discussions. The bin stores should be secured and access given to residents only by preferably a fob/digilock rather than a key. This will help to reduce issues such as misuse of bins, fly tipping/other ASB. Fobs/codes will need to be shared with LBH prior to occupation. The commercial bin store in block C is separate from the residential bins as is required. Sizing/number of bins will very much depend on the type of businesses that occupy the space (108m2), the waste/recycling they generate and the contracts they put in place for the collection of this. Commercial waste collection companies will provide up to twice daily collections 7 days per week. I would however advise against sizing the bins store based on minimum size and maximum collections. The store should be sufficient to store waste for one week based on the following advised litres for different classes: Commercial waste provision has been calculated based on Westminster City Council (WCC) Recycling and Waste Storage Requirements (2021 which results in the waste	Comments have been taken into account.

Stakeholder (LBH)	*Comments*	*Response*
	provision requirements proposed and assume no compaction and two days storage. The rationale behind these calculations make sense and it is initially proposed that a private waste contractor will collect the waste every two days. However, it would be worth considering additional waste and recycling storage for the businesses to keep vehicle movements and emissions to a minimum.	
Pollution Officer	Having considered all the submitted supportive information i.e. Design and Access Statement dated March 2022, Energy Strategy prepared by AJ Energy Consultants Ltd dated March 2022 taken note of section 10 (Renewables Detailed Proposal) using heat pumps and photovoltaic panels, Desk Study Report with reference ASL Report no: 285-21-088-11 prepared by ASL Limited dated September 2021 taken note of sections 9 (Assessment of Contamination Risk), 11 (Further Work) and 12 (Summary & Recommendations) as well as the Air Quality Assessment Report with reference AQ2032 prepared by GEM Air Quality Ltd dated March 2022 taken note of sections 4 (Assessment Methodology), 5 (Air Quality Assessment), 6 (Air Quality Neutral Assessment) and 7 (Conclusions & Recommendations), please be advise that we have no objection to the proposed development in relation to AQ and Land Contamination but the following planning conditions and informative are recommend should planning permission be granted. 1. Land Contamination Before development commences other than for investigative work: a. Using the information already submitted in Desk Study Report with reference ASL Report no: 285-21-088-11 prepared by ASL Limited dated September 2021, an intrusive site investigation 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. b. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. c. Where	Comments have been taken into account. Appropriate conditions will be secured.

Stakeholder (LBH)	***Comments***	***Response***
	remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and; d. A report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety. 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. 2 Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework. 3. Updated Air Quality Assessment Whilst the submitted Air Quality Assessment report with reference AQ2032 prepared by GEM Air Quality Ltd dated March 2022 is noted however, considering the distance of the proposed development to the monitoring sites used as baselines not fully representative of the development site which is beside a major road (A10) and the likely operational effect of the road on the proposed development occupiers, an updated AQ assessment will need to be conducted so as to determine the actual existing baseline concentration in other to know the level of mitigation that will be required for the various floors of the development. We also take note of the use of heat pumps and photovoltaic panels as energy source as well as the earthworks/construction dust medium risk. Therefore, in other to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people), • Applicant will need to provide us an addendum AQ assessment of the proposed development taken into consideration the likely operational impact on the development by its proximity to a major busy road i.e.	

Stakeholder (LBH)	*Comments*	*Response*
	(A10) so as to be able to reach an inform decision on its significant effects on the proposed development site and the overall local air quality. • Actual baseline monitoring will need to be undertaking at or within the close proximity of the site itself rather than relying purely on baseline monitoring farther away from the site or Defra mapped background concentrations. • Applicant will need to provide a revised predicted NO2 Concentrations for the various building floors following such assessment. Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction. 4. NRMM a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site. b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion. Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ 5. Demolition/Construction Environmental Management Plans a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The following applies to both Parts a and b above: 3 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	

Stakeholder (LBH)	*Comments*	*Response*
	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. Dust Monitoring and joint working arrangements during the demolition and construction work; 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	

Stakeholder (LBH)	***Comments***	***Response***
	mitigation in the Air Quality Report i.e. in Figure 7.4.2 (Air Quality Neutrality) Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out. Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality." Informative: 1. Prior to the demolition of 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.	
Noise Officer	The Noise Impact Assessment (SLR Ref403.12561.00001), submitted March 2022 outlines mitigation measures for the control of noise from the existing car wash and petrol station. The mitigations measures they have proposed are sound and achievable. We have no noise complaints on record and so have assumed that the hours they have stated the garage operates at 52 Lordship are accurate and therefore accept the assessment they have undertaken and the conclusions drawn for this noise source. Further assessment of this source may be required in the event there is no restriction on their operating times. The applicant will be required to confirm specifically the measures they will implement based on those recommended in the report. The recommended condition for control of noise from mechanical plant associated with the site (see section 6.3.5) should be included in any permission granted. It would be helpful to include an informative that outlines they may be required to take additional corrective measures in the event the levels specified in the condition are exceeded. I have no objections to the development in principle on the proviso control of noise measures are undertaken as outlined in the report provided.	Comments have been taken into account. Appropriate conditions will be secured.
		Noted.

Stakeholder (LBH)	***Comments***	***Response***
LBH Building Control	Although Fire Service access needs to be clarified, in particular to Block D, there are no other issues noted at this stage regarding fire safety. It is noted that the fire strategy has been checked by Fire Engineers BB7, and will be subject to a detailed check when the application is formally submitted under the Building Regulations.	

Stakeholder (External)	*Comments*	*Response*
Historic England	Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.	Comments noted.
Historic England (GLAAS)	I have examined the submitted archaeological DBA and geotechnical logs. In view of extensive evidence of past disturbance, I recommend that archaeological investigation is not appropriate in this case.	Comments noted.
London Fire Brigade	No comments received.	Noted.
Transport for London	Thank you for consulting TfL. Regarding the above application, we have the following comments: 1) The development site is located off the A10 the Roundway, which bounds the site to the south and to the west. The A10 The Roundway forms part of the Transport for London Road Network (TLRN). The site is bound by Church Lane to the east and a petrol station to the north. Access into the site is achieved from The Roundway and Church Lane. TfL is the highway authority for the TLRN, and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN. 2) TfL welcomes that the development is proposed to be car free except for 4 blue badge spaces, in line with London Plan Policy T6 (Car Parking). Due to the low levels of parking proposed, TfL request that all 4 blue badge spaces are provided with active electrical vehicle charging points from the outset.	Comments have been taken into account and conditions and planning obligations will be secured as appropriate.

	3) The development proposes a total of 139 long stay spaces for both the residential and non-residential elements and a further 24 short stay spaces, this is in line with the minimum requirements set out in London Plan Policy T5 (Cycling). TfL request that the applicant provides five per cent of the long stay cycle parking to be accessible spaces which can accommodate larger cycles, including cargo cycles and adapted cycles for disabled people TfL strongly support that the applicant is not relying on two-tier cycle racks in the proposed cycle stores TfL request that the long stay and short stay cycle parking is secured by condition, clearly setting out the proposed design and layouts of the cycle stores, in line with the requirements set out in chapter 8 of the London Cycling Design Standards. 4) TfL support that the applicant is proposing to widen several footways around and in the development site and welcome the proposal of a new east-west pedestrian link. - It is welcomed that an ATZ assessment has been conducted and TfL would support Haringey Council securing a number of the improvements identified in the ATZ which would improve the connection and route for both cyclists and pedestrians from the development in accordance with London Plan Policies T2 (Healthy Streets), D7 (Public realm) and T1 (Strategic approach to transport). 5) TfL welcome the comprehensive measures set out in the Delivery and Servicing Plan, in line with our advice in pre-application discussions 6) TfL welcome that both a residential and workplace travel plan has been submitted for the development - TfL request that the applicant provides a bike repair kit for the residential cycle stores, as well as the workplace cycle stores 7) During pre-application discussion with the applicant, TfL requested that a Road Safety Audit (RSA) was undertaken and shared with TfL safety experts on the	

	proposed loading bay on the A10. An RSA is required alongside the application. The applicant will need to agree with TfL the RSA auditors are suitable qualified and we should agree the scope of RSA. In this case should include the relocated VMS, which also shows the drivers view as well as the plans 8) Regarding the relocating of the Variable Message Sign, any permission granted for this development will need to secure the cost of removal and reprovision of a replacement at a new, agreed location via an appropriately worded condition and/or planning obligation, to ensure TfL is not liable to unwanted cost. 9) In pre-application discussion, TfL recommended that the loading bay on Church Lane should be restricted during peak hours to minimise potential conflicts between delivery and servicing and cyclists at the busiest time. In the documents provided, there does not seem to be any mention of this, TfL request that the applicant clarifies if this safety measure can be implemented. The applicant must provide robust justification if they refuse to implement this. 10) The applicant must clarify the remaining proposed footway widths during construction periods on both The Roundway and Lordship Lane - 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 11) A detailed Construction Logistics plan must be secured by condition and produced in accordance with TfL best practice guidance. - Further discussions between TfL and the applicant may be required should the applicant require a pit lane on the A10 during construction, or on Church Street and Cycleway 1, to ensure the safety of pedestrians, cyclists and traffic on the	

	TLRN in line with policy T7 (Deliveries, servicing and construction) of the London Plan and policy 3 (Vision Zero) of the Mayors Transport Strategy (MTS). TfL request that the above is addressed by the applicant before we can fully support the proposal	
Environment Agency	Thank you for consulting us on this planning application. Having reviewed the submitted Flood Risk Assessment (FRA) we object to this planning application. The FRA titled 'FLOOD RISK ASSESSMENT AND DRAINAGE STATEMENT' (ref: 4756-ROUN-ICS-XX-RP-C-07.001, dated: March 2022) does not provide any information on the development's proximity to the Moselle Brook which is in close proximity to this site. Further information would be required to identify the exact location of this watercourse and we may need further information to show that the proposed development would not have an adverse impact on this culvert. Please see further detail in the objection below. Reason: This application may involve works within 8 metres of a culverted watercourse (The Moselle Brook). As submitted, it is unlikely that we would grant a flood risk activity permit (FRAP) for this application. In addition the proposal does not comply with the requirements for planning, as set out in paragraphs 149 to 157 of the Flood Risk and Coastal Change section of the planning practice guidance. This is because the applicant has not adequately assess the development's impact on proximity to the culvert. More specifically the applicant has failed to provide the following information: 1. The applicant has not provided a map showing the exact location of the culvert in relation to the development and the applicant has not assessed whether an 8m buffer zone will be provided between the outer edge of the culvert and the proposed development. 2. The applicant has not shown that access to the culvert will be maintained post construction. The applicant has not considered the space required (8m) for future culvert maintenance or replacement, including the use of vehicles and heavy duty machinery. 3. The applicant has not demonstrated that the current condition of the culvert is sufficient and will be maintained for the	Comments have been taken into account. Informative will be secured.

	lifetime of the development. . The applicant has not demonstrated that there will be no adverse effects on the structural integrity of the culvert. Overcoming our objection: The applicant will firstly need to provide the information outlined in point 1 above. More specifically the applicant must provide a map showing the exact location of the culvert in relation to the development. Our records indicate that the culvert is owned and maintained by Thames Water. Thames Water may have a culvert plan on record as it is their asset. We will need to know the exact distance between the outer edge of the culvert and the development. We would expect the applicant to demonstrate that an 8m buffer zone will be provided between the outer edge of the culvert and the proposed development. If an 8 metre buffer zone cannot be achieved the applicant must demonstrate that the proposed development will not increase the likelihood of structural failure due to additional loading which poses the risk of collapse and potential blockages, increasing flood risk. To do this the applicant would need to provide the missing information outlined in points 2 through to 4. The applicant will need to use the culvert survey to inform the depth of any foundations/piles. To reduce loading on the culvert, foundations/piles should be laid deeper than the culvert. Dependent on the extent of excavation / piling/ foundations, we will also require the applicant to submit a recent condition survey of the culvert which demonstrates that the culvert is in sufficient condition. If the culvert condition is insufficient, its condition must be improved before we can consider the proposal acceptable. This could be done through maintenance, upgrade or replacement as appropriate. The applicant should note that a FRAP may be required for certain survey works. Finally, if the applicant can demonstrate that the proposed development will be set back more than 8m from the outer edge of the culvert then the information outlined in points 2 through to 4 will not be required. Final comments: In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome. If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further	

	representations. Should our objection be removed, it is likely we will recommend the inclusion of conditions on any subsequent approval. Amended comments: We have reviewed the document titled Flood Risk Assessment and Drainage Statement (ref: 4756-ROUN-ICS-XX-RP-C-07.001, dated: May 2022) and consider that it satisfactorily addresses our earlier concerns. We therefore would like to withdraw our previous objection dated 12 May 2022. We ask that you include the below informative in any decision notice. Environmental permit - advice to applicant The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place: • on or within 8 metres of a main river (16 metres if tidal) • on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal) • on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission For further guidance please visit https://www.gov.uk/guidance/flood-risk-activitiesenvironmental-permits or contact our National Customer Contact Centre on 03708 506 506. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.	
Thames Water	Waste Comments Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. There are public sewers crossing or close to	Comments have been taken into account. The recommended conditions and

	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://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB Water Comments 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	informative will be secured.

	near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale- 2 developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk 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. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes 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.	
Metropolitan Police Designing Out Crime Officer	***Section 1 - Introduction:*** Thank you for allowing us to comment on the above planning proposal. With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and	Comments have been taken into account. The recommended conditions and

	recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1). We have met with the project Architects to discuss Crime Prevention and Secured by Design at both feasibility and pre-application stage and have discussed our concerns and recommendations 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 and have stated that they will be working in close collaboration with 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 be easily be mitigated early if the Architects/Developers ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.	informatives will be secured.

	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. The development shall only be carried out in accordance with the approved details. B. Prior to the first occupation of each building, or part of a building or its use, **'Secured by Design'** certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained. C. The Commercial aspects of the development must achieve the relevant **Secured by Design** certification at the final fitting stage, prior to the commencement of business and details shall be submitted to and approved, in writing, by the Local Planning Authority. **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. ***<u>Section 3 - Conclusion:</u>*** 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.	

Appendix 4 – Summary of Representations from Residents

	Summary of objection	Response
LOCAL REPRESENTATIONS: ***5 INDIVIDUAL RESPONSES*** ***3 IN OBJECTION/ COMMENT*** ***2 IN SUPPORT***	**Material planning considerations** • Excessive size and scale	• The development is not significantly greater in height than other buildings in the surrounding area. Its detailed design would minimise its apparent scale and massing. It would not dominate the plot or the locale and would not constitute overdevelopment of the site.
	• Inappropriate design • Out of keeping with local character	• The development would have a contemporary appearance and takes cues from the heritage characteristics in the surrounding area. The design has general support from the Quality Review Panel and the Council's Design Officer.
	• Negative impact on local heritage	• The potential heritage impact of the development has been considered from an early pre-application stage and the scale and massing of the development has been reduced to minimise the impact on local heritage whilst also ensuring the development is viable enough to meet other policy requirements. There would be some limited heritage impact but this would be at the moderate level of less than substantial harm and is outweighed by the benefits of the development.

	• Insufficient parking provision	• A parking survey has shown there is ample parking availability on-street to accommodate overspill parking. The provision of off-site parking spaces is supported in this case, on balance, given the other benefits of the proposal including the development of a vacant site and provision of affordable housing.
	Non-planning considerations • Alternative designs should be considered	• This application must be considered on the basis of the designs put forward by the applicant.