Appendix 3 – Consultation Responses from Internal and External Agencies

Stakeholder (LBH)	***Comments***	***Response***
Design Officer	**<u>Introduction</u>** This major application is for a project that should be the centrepiece of a major improvement to one of the most important council housing estates in Haringey. Broadwater Farm was built in the 1970s on what was then the last remaining bit of agricultural land in Haringey, in low-lying, floodable land deep in the residential hinterland, roughly mid way between Tottenham and Wood Green's High Roads (though closer to Tottenham). It is not particularly accessible, being about 1km from the High Road at Bruce Grove station, and separated from Lordship Lane, one of the busiest and well-bus-served east-west streets in the borough, by about 200m of other, impermeably laid out estates, but provides a lot of affordable homes. Lordship Rec, a large public park, adjoins the estate to its west, containing an unculverted section of the River Moselle, which continues in a culvert under the estate. The park extends north to Lordship Lane and south to Down Lane Park. Streets of terraced housing from the 1980s to 1930s adjoin the estate to it's south and east, with small, lower-rise 1970's – 1990's estates and public services (including schools & a health centre) to the north. The 1970s estate was mostly built using the Large Panel "System Building" technique, using pre-fabricated, room-sized, reinforced-concrete wall panels, on "pilotti" (meaning most of the building is raised above ground on columns) allowing a mostly open ground plane, much in the form of dark and uninviting undercrofts, with streets and a large amount of surface parking extending between the columns beneath the buildings. Supposedly this was out of concern for flooding, but this is no longer considered a concern, whilst it allowed high parking provision as was the habit at the time, though much of the parking is now understood to be used by non-residents. As originally built, all the blocks were connected by "streets In The Sky" raised walkways.	Comments have been taken into account. Materials to be controlled by condition.

Stakeholder (LBH)	***Comments***	***Response***
	Social problems mostly in the early years since completion, and building problems mostly later, have lead to significant physical changes over the years, including removal of most of the raised walkways, insertion of prominent entrance halls with concierge offices to each block, replacement of the estate-wide district heating and artwork to prominent blank walls. New and improved community, retail and employment facilities were created in a mixture of repurposed and ad-hoc new structures in gaps in the estate. However, recent structural investigations revealed the need for strengthening of some blocks, and the need to demolish and replace two; Tangmere and Northolt. Meanwhile, three schools on the northern edge of the estate were redeveloped over 10 years into two schools and a childrens' centre in award winning new buildings, with the site of the last-vacated previous school, Moselle, forming a further site. This creates a diagonal swathe of development land running from the south-western to the north eastern corner of the estate. **<u>Masterplan</u>** In accordance with the Site Allocation SA 61, a masterplan, in the form of an Urban Design Framework, is included in this application. It covers integration of the proposals into the remainder of the estate, small scale improvements (mostly to the public realm) of the rest of the estate and better integrating the whole estate into its surroundings. The existing estate form, of large blocks standing on pilotti, with streets lacking clear definition and separation from areas of parking and open space, marks it out as sharply different from the traditional layout of narrow streets lined with small terraced houses, and while the estate has exemplary connections to neighbouring Lordship Rec and to the non residential facilities within the estate, its connections through the convoluted streets and paths to the south, east and north to surrounding areas and wider parts of London are poor, and the Framework seeks to improve these.	

Stakeholder (LBH)	***Comments***	***Response***
	The Framework epitomises key principles of this development, including embracing the Character and Scale of the existing estate, along with Ground Floor Activity, Sate, Healthy Streets and Welcoming and Inclusive Open Spaces. Therefore the Framework largely envisages the blocks on pilotti and courtyards of the retained parts of the existing estate are largely unchanged, apart from better landscaping through the Future Projects, with active street frontages focussed onto the two main east-west streets, Adams Road and Willan Road. The more streets-based form of the new blocks, therefore integrate into the estate by providing their active non-residential ground floor frontages on those streets. The new development also provides safe, public, north-south routes between those streets and across the whole estate from its main entry points in the south-west and north-east corners, liberating the otherwise undifferentiated open ground floor planes of the retained blocks and courtyards of the estate to be more private and more for the estate. A more residential, more green primary diagonal route follows the south-west to north-east line of development sites, crossing the two east-west streets at “Civic Squares, the focal point of activity and intensity in the new development and the focal meeting between old and new. Between those, the green diagonal route opens out into a large new green square, full of trees, landscape and play features, many referencing the River Moselle, culverted directly beneath this, and replacing the Memorial Garden at the southern edge of the existing estate. Whilst the existing Memorial Garden separates the estate from the older houses to the south and lacking in passive surveillance and overlooking homes, or on any desire line routes, is perceived as unsafe and under-cared-for, this new green space will be well overlooked and on a major desire-line route. The Framework also details the extensive public and residents’ consultation that has lead the proposals to embracing elements of the existing estate that are clearly well loved by its residents, including the typical block heights, the open courtyards that are democratic and for everyone, and the concrete based architecture with strong,	

Stakeholder (LBH)	*Comments*	*Response*
	architecturally distinctive gables. Extensive engagement has included imaginative techniques to embrace “hard to reach” sections of the community, and there has been strong community participation in all aspects of the design of this proposal. There have also been three Haringey Quality Review Panel (QRP) reviews of the proposals, which generally gave the proposals a warm review, albeit with various detailed concerns which have subsequently been addressed. **Development Pattern, Form, Massing and Height** Taking cues from the principles established in the Framework, the proposals for the specific development sites embrace the best of the architectural style, form and heights of the existing estate. Block heights match those of the existing estate, with just two points, marking the “civic squares” at the key junctions of the two east-west main streets with the new south-west to north-east diagonal route, rising above the general 8 storey datum. These semi-tall blocks nevertheless stay below the height of Kenly, the retained tower block, which retains it’s recognised primacy. A large number of local and wider views of the proposals have assessed to what extent the proposals would be visible from the surrounding areas, and demonstrate that whilst in some places there would be new glimpses of the new blocks generally this would not happen much more than the existing estate can be glimpsed. The form of development proposed is generally of more complete urban blocks than the existing estate, in line with best urban design practice, making a clear definition of streets and spaces, and defining more private central courtyards. But edges and corners of the courtyards are opened up to the public realm with gaps in the blocks, closed with storey height brick logia screens with gates that will be open during the day, giving the courtyards a semi public nature compatible with the existing estate whilst also providing a secure boundary and clear demarcation between public and private realm in accordance with best urban design practice today.	

Stakeholder (LBH)	*Comments*	*Response*
	At the southern end of the site, south and east of the replacement of Tangmere, new terraced townhouses will back onto the existing houses to the south that pre-date the Broadwater Farm estate, matching them in scale form and height, even though most of these proposed townhouses are of three storeys against the existing two storeys, as the slope is steep here, and ack gardens will be against back gardens, improving security and privacy for both, overall improving the way the estate meets and is tied into its surroundings on this side. Similarly at the northern end of the proposed development, the northern side of the new Moselle block is to be formed of a row of townhouses, matching the scale of the existing housing to its north. **<u>Elevational Composition, Materials and Detailing</u>** The proposals' elevational composition match the best elements of the existing estate with best practice and elegant design. For instance, whilst the regular, gridded facades of the upper floors of the proposed blocks echo the existing estate, the new blocks add a distinctive base, a characteristic of newer "mansion block" developments, rooting the proposed blocks in their street or space, adding clearly identifiable front doors to ground floor maisonettes, communal entrances and non-residential uses, accommodating plant, bin and bike stores and front gardens for ground floor flats and maisonettes. Communal entrances are particularly thoughtfully designed, with generous height and glazing giving airiness, space and durable materials designed to provide a sense of occasion and functionally accommodating residents, visitors and functions. Gables are also picked out with dramatic contrasting solid and void, such as in the gridded façade of balconies and logia where the west side of the civic square on Willan Road, echoing the gridded facades of drying rooms etc in the gable ends of some of the existing blocks. Non residential ground floor uses, focussed on the two main east-west streets and the two civic squares where the diagonal route crosses them, have shopfront designs as appropriate for their intended uses and character with clearly	

Stakeholder (LBH)	*Comments*	*Response*
	distinguished signage zones. Tops of the two taller buildings are further expressed as a crown, adding to their distinctiveness and aiding their elegance of composition. The proposed materials palette incorporates a significant amount of pre-cast concrete, echoing the distinctive qualities of the existing estate. Nevertheless brick features almost as strongly, so that the proposals reconcile the materials of the exiting estate and existing predominantly brick surrounding housing. This material palette should be durable and maintain an attractive appearance, provided quality of specification and detailing is maintained by condition and preferably by retaining the current architects. The warm palette will be complemented by deep colours for joinery and metalwork, with a subtly different, distinctive brick and colour used for each of the three blocks. **Residential Quality** Tremendous care has been put by the applicants architects into the design of the proposed new houses, maisonettes and flats, to ensure that they are spacious and suited to modern use patterns and the mix of sizes needed, whilst echoing the pattens and layouts of the existing estate, to help integrate the new residents with those existing. Therefor the palette of flat types include “scissor flats”; maisonettes entered off one side of a central corridor, with living rooms on that level facing one way, and a stair leading to an internal private corridor over the communal corridor to bedrooms on the opposite side, a rare flat type achieving dual aspect in a central corridor building. Other excellent quality interesting flats include large family sized flats on the ends of blocks with large balconies or roof terraces in the gable end, contributing to the distinctive gridded gable form mentioned above animating the more important public spaces and providing a way to integrate family sized units on the upper floors of flatted blocks without the disadvantage of lack of a private garden. Generally, flat layouts are	

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	exceptionally well thought through, often with circulation loops and second living room spaces in circulation to help larger families or sharers live together more comfortably. As is to be routinely expected, all room and flat sizes meet or exceed statutory minima, and are provided with plentiful private external amenity space. Day and sunlight levels, privacy from overlooking and being overlooked along with interesting outlook are all thought about carefully and achieve good results. It will be important, though, that the residential quality of the proposed flats, maisonettes, houses, spaces and streets are protected in implication, preferably by retaining the current architects. **<u>Conclusions</u>** From a design point of view, these proposals are an exemplary insertion into a large existing council estate, helping to resolve some of the urban design and public safety problems of large undercrofts and the ground frontage of pilotti [columns] with new more street focussed buildings set around a series of logical routes and exciting public civic squares, landscaped courts and the new central garden square. The proposals will also help bridge the boundaries between the existing estate and surrounding streets, in their architectural expression and in the network of pedestrian friendly streets containing what should be attractive non-residential activities. The residential qualities of the flat and house layouts and the design quality and ambition of the proposed detailing should be exemplary, provided the current architects are retained, or the planning authority give approval of any change of architect, along with the option of retaining the current architects in at least an advisory role, that their designs are broadly followed through, and that a suitably qualified architect continues to be engaged as the project coordinator & design champion, responsible for preparing, overseeing or approving all drawings of external details required for planning conditions, through the whole of the construction phase for the development.	

Stakeholder (LBH)	***Comments***	***Response***
Conservation Officer	This project does not impact any heritage asset as far as I am aware and therefore there is no comment from the conservation perspective.	Noted
Housing Officer	All of the homes delivered will be let at social rent, and the scheme delivers 81 additional council homes beyond the 213 that are being demolished. The scheme also delivers significantly more family-sized homes and real improvements in terms of quality. We therefore entirely support this scheme form a strategy and policy perspective.	Comments have been taken into account.
Transportation Officer	I have reviewed the above application, below are my comments. I have also set out a list of recommended planning conditions and obligations. **Transport Assessment** <u>Development Proposals</u> The Proposed Development would provide: • 294 dwellings (Land Use Class C3) – 35% will be 3 bed+ family homes • 635 sqm of Class E enterprise space • 266 sqm of Class F community floorspace (replacement health facility) • 381 sqm retail unit (Class E) within the Former Moselle School Site • New public realm activated by community and commercial uses and a bus stop The development proposals would deliver an increase of 52 dwellings (from 242 to 294). <u>Proposed Cycle Access</u>	Comments have been taken into account. The recommended conditions and planning obligations will be secured as appropriate.

Stakeholder (LBH)	***Comments***	***Response***
	The proposed development would create new internal streets. It is intended for cycle routes to be provided throughout the site, and it is expected that the principles set out in LTN 1/20 Cycle Infrastructure Design would be followed closely. It is noted that Cycleway 1 runs along Broadwater Road to the east and is accessed via Wimborne Road or the Avenue. <u>Proposed Vehicular Access</u> Two new internal link roads are proposed. Combined Stage 1/2 Road Safety Audits would be required to cover 4 junctions (1 with Gloucester Road, 2 with Willan Road and 2 with Adams Road) and be secured by planning condition. <u>Proposed Residential Cycle Parking</u> Cycle parking is proposed to be provided in line with the London Plan (2021) minimum cycle parking standards. A minimum of 5% of all long-stay cycle parking would be in the form of Sheffield stands for larger cycles, in accordance with the London Cycling Design Standards (LCDS), whereas 14% of all long-stay spaces would also be in the form of Sheffield stands, but for regular cycles. The remainder would consist of two-tier racks (44%) and spaces in dwellings (37%). The latter respond to feedback from residents and concerns about security. This was discussed during pre-application meetings and the principle of relocating a number of spaces into dwellings has been agreed as a way of satisfying residents' requests as well as freeing up space at ground floor level to activate frontages. At least one lift per core would be sized to fit a cycle. As far as non-residential cycle parking is concerned, the requirements for the proposed "enterprise space" classified under Class E have been based on Class B1 standards equating to 5 long-stay and 2 short-stay spaces, as the enterprise space is described as a training facility or business land use (former land use class B1). The proposed	

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	provisions exceed the minimum requirements, with 9 long-stay and 2 short-stay spaces. The adequacy of the long-stay and short-stay cycle parking and access arrangements would be secured by planning condition. This would involve the provision of full details showing the parking systems to be used, access to them, the layout and space around the cycle parking spaces with all dimensions marked up on plans. <u>Proposed Car Parking</u> The total number of existing spaces within the red line boundary is confirmed to be 225 spaces. Based on the existing car ownership levels derived from a telephone survey of residents undertaken in 2021, the estimated total demand of the proposed 294 dwellings would be 217 spaces. A parking stress survey was carried out in 2020 across the whole estate and identified that there existed spare capacity both on street (public and private roads alike) and in undercroft parking areas, with a total of 405 available spaces. The CPZ is not active on the adopted roads within the estate (Adams Road, Gloucester Road, Griffin Road and Willan Road), therefore there is potential for overspill parking from actually controlled roads in the CPZ onto the uncontrolled roads including the estate roads (off CPZ). The proposals are for 91 of the 217 spaces to be accommodated within the red line boundary whereas the remainder (126 spaces) would be accommodated in other parts of the estate where the results of the parking stress survey indicate that there is ample spare capacity.	

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	No formal assessment of the impact of the redistribution of parking has been undertaken in the Transport Assessment (but this is briefly discussed in the Parking Design and Management Plan), however: - It is estimated that the future total parking demand from residents in the estate would be approximately (1,059 + 52) x 0.73 = 811 spaces. That accounts for the total existing number of homes (1,059) and the increase in the number of dwellings as a result of the proposed development (52), as well as the existing average car parking ratio per dwelling. - The proposed development would result in the removal of 225 existing spaces from the existing parking stock, thereby leaving 782 spaces, to which 91 spaces within the application site would be added, taking the new proposed total to 873. - The overall parking occupancy across the estate would therefore amount to up to 811/873 = 93%, leaving 62 residual empty spaces. This is a worst-case assessment as the parking stress survey shows that the maximum occupancy was 602 / 1,007 = 60% and the Tangmere block which is part of the application site has 116 units but is vacant, hence less demand. Northholt which is also part of the site is part-occupied, part-vacant and has 126 units. Wheelchair-accessible car parking would be provided in line with the London Plan (2021) standards, namely for 3% of dwellings from the outset (9 spaces). Provision for up to an additional 7% of dwellings (21 spaces) would be provided as and when required based on demand, by converting regular spaces. Evidence shows that the conversion of regular spaces into wheelchair-accessible bays does reduce the overall provision due to the required dimensions of such spaces, however the post-redevelopment overall parking occupancy across the estate shows that there is more than sufficient capacity to afford a slight loss of parking spaces as a result of such conversions.	

Stakeholder (LBH)	***Comments***	***Response***
	In accordance with the London Plan (2021) standards, active electric vehicle charging infrastructure would be provided for 20% of spaces from the outset, whilst the remainder would be fitted with passive infrastructure. <u>Proposed Delivery and Servicing Arrangements</u> Delivery and servicing activity would continue to operate on street. However, 2 dedicated loading bays have been included, respectively on Willan Road and Adams Road. Swept path analysis shows that a 10m rigid vehicle, a waste collection vehicle and a fire tender vehicle could manoeuvre easily within the internal streets and benefit from sufficient visibility splays at junctions and at a bend. <u>Proposed Highway Stopping-Up and Adoption</u> Extents of the public highway are proposed to be stopped up for the development to be built, whilst sections of land would be adopted to straighten up the current highway layout. Should planning permission be granted, a s.247 agreement would have to be entered into by the applicant with the Council in order for the public highway to be stopped up in the locations identified within the Transport Assessment and accompanying drawings. Likewise, a highway dedication agreement would also have to be entered into (considering the nature of the adoption proposals, a s.72 agreement would likely be used). <u>Active Travel Zone Assessment</u> A total of 8 key routes from the site to a number of destinations have been analysed, the general findings are as follows: - Inconsistent pavement surfacing, occasional lack of fully dropped kerbs and tactile paving, or misaligned facilities in relation to pedestrian desire lines - Narrow footways in some very localised places	

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	- Lack of formal crossing facilities where a need has been identified - Reduced footway widths as a result of food stalls – bollards could be removed to increase widths - Traffic calming measures to reduce the average speed limit to under the existing 20mph speed limit - Need for segregated cycle lanes - Need to review barriers and bollards protecting footpaths when they hinder the movement of wheelchair users and pushchairs - Lack of lighting under a railway bridge Transport contributions towards the delivery of walking and cycling infrastructure as per the Council's Walking and Cycling Action Plan would be sought. A list is given further below. <u>Vision Zero/KSI Analysis</u> A Vision Zero/Killed and Seriously Injured (KSI) analysis has been undertaken in conjunction with the ATZ assessment. The findings and recommendations are set out below: - Lordship Lane/The Roundway/Downhills Way signalised junction: collisions in the last three years suggest that the informal crossings at the Lordship Lane (eastbound) approach *"could be upgraded to be signalised and more green time given to pedestrians."* - Lordship Lane/The Roundway mini-roundabout: collisions in the last three years suggest that the approach roads not having cycle lanes could be a cause of accidents for cyclists, alongside too high a speed limit (currently 30mph), which could benefit from a reduction to 20mph. It is understood that TfL is working with London boroughs to roll out a 10mph speed limit reduction on sections of the	

Stakeholder (LBH)	*Comments*	*Response*
	Transport for London Road Network (TLRN). A schedule by TfL suggests that the A10 Roundway and A10 Lordship Lane are not yet included in the roll-out. However it is noted that there is a plan to lower the speed limit along the A10 Bruce Grove east of the site and along the A10 Great Cambridge Road north of the site later in 2022. <u>Public Transport Accessibility Level (PTAL)</u> The site's PTAL score ranges from 1a to 2, denoting poor connectivity. <u>Trip Generation Assessment</u> The parameters of the trip generation assessment were agreed at pre-application stage. The existing, proposed and net residential trip generations have been reviewed and found to be acceptable. The non-residential land uses would have a local catchment and therefore generate local visits undertaken primarily by active travel modes – walking and cycling, with a substantial degree of internalisation of trips. The proposals would also result in a net decrease in employee numbers therefore employee trips have not been considered further. The delivery and servicing trip generation indicates that the peak hour would be 10:00-11:00, with up to 5 vehicles. Overall, the net impact would be an additional 10 delivery and servicing vehicles per day compared to the existing situation and it is agreed that the additional demand can be easily absorbed by the local highway network. <u>Safeguarding a Two-Way W4 Bus Service</u> In line with discussions had with TfL, Gloucester Road and Willan Road would be widened in order to accommodate two-way travel for the W4 bus service. It was previously agreed the loss of on-street parking as a result of this safeguarding would	

Stakeholder (LBH)	*Comments*	*Response*
	be acceptable owing to the spare capacity identified during the parking stress survey and the fact that accommodating enhanced bus services takes precedence over on-street parking in the hierarchy of road users. <u>Net Transport Impact</u> The net impact of the proposed development upon the local transport networks is predicted to be low. **Parking Design and Management Plan** The Parking Design and Management Plan was previously reviewed. The reinstatement of CPZ controls is key to the parking strategy. Monitoring would be undertaken at the same time as the Travel Plan monitoring surveys and seek to determine the effectiveness of the parking controls as well as the evolution of car ownership levels over time. The results should inform whether there is scope to reduce the overall parking provision across the estate over time by decommissioning unused spaces. **Outline Delivery and Servicing Plan** No further comment, the Outline Delivery and Servicing Plan is acceptable and a detailed document would be secured by planning condition. **Framework Travel Plan** No further comment, the Framework Travel Plan is acceptable. The Travel Plan would be secured through a s.106 planning obligation including the production of interim/pre-occupation, full/operational and individual Travel Plans as well as monitoring reports.	

Stakeholder (LBH)	*Comments*	*Response*
	Car parking occupancy data would be collected as part of the Travel Plan monitoring, and feed back into the Parking Design and Management Plan. **Outline Construction Management Plan** No further comment, the Outline Construction Management Plan is acceptable and a detailed document would be secured by planning condition. **Recommended Planning Conditions** - Cycle Parking Details - Delivery and Servicing Plan - Detailed Construction Logistics Plan - Public Highway Condition - Request to provide Stopping-up and Public Highway Dedication Drawings and Enter into appropriate legal agreements - Combined Stage 1/2 Road Safety Audits (4 locations: junctions of the new internal link roads with Adams Road, Willan Road and Gloucester Road) **Recommended Section 106 Heads of Terms / Planning Obligations** - Parking Design and Management Plan: o Provision of electric vehicle charging points – 20% active and 80% passive o Provision of 3% accessible parking from the outset and up to an additional 7% as and when required in future o Car parking stock management (commissioning and decommissioning) o Space allocation strategy and priority order (wheelchair-accessible users, family dwelling residents etc)	

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

	- Residential Travel Plan (including pre-occupation/interim and operational/full documents, monitoring reports and a £10k monitoring contribution) including:
	  o Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan)
	  o Baseline travel survey to be undertaken on Year 0 within 6 months of first occupation, or at 75% occupancy, whichever occurs first
	  o Follow-up surveys to be undertaken on every other anniversary of the baseline survey (Year 1, 3 and 5)
	  o Car parking occupancy data to be collected as part of the Travel Plan monitoring, and fed back into the Parking Design and Management Plan
	  o Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new household
	
	- Commercial Travel Plan Statement for the retail unit and enterprise space (including interim and full individual documents and monitoring reports) including:
	  o Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan)
	  o Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new tenant/organisation
	  o Cyclist facilities (lockers, changing rooms, showers, drying rooms for the non-residential uses)
	  o Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new employee
	
	- CPZ contribution to reinstate controls on roads throughout the estate as well as towards the ongoing review and expansion of existing Controlled Parking Zones – £30,000	

Stakeholder (LBH)	*Comments*	*Response*
	- Section 278 Highway Works – scope and extent of works to be defined after obtaining a detailed Section 278 drawing for costing purposes - TfL contribution towards bus service enhancements? Waiting for TfL's input - Transport Contributions towards the funding of Walking and Cycling Action Plan measures: Requested for this application o Contribution towards feasibility and design of the Lordship Lane protected cycle track and spur link to the site – total £450,000 in the WCAP £150k o Contribution towards feasibility and design of the Finsbury Park-Bruce Grove (via North Grove) protected cycle track and spur link to the site – total £250,000 in the WCAP £100k o Accident reduction strategy (covering clusters at the following locations: Lordship Lane/The Roundway/Downhills Way signalised junction, Philip Lane/Greyhound Road, High Road/Lordship Lane signalised junction and Lordship Lane/The Roundway mini-roundabout) - £150k	
Carbon Management Officer	**Carbon Management Response 25/08/2022** In preparing this consultation response, we have reviewed: • Circular Economy Statement prepared by XC02 (dated June 2022)	Comments have been taken into account. The recommended conditions and

Stakeholder (LBH)	*Comments*	*Response*
	• Energy Statement (including Overheating Assessment) prepared by XC02 (dated February 2022) • GLA Carbon Emission Reporting Spreadsheet (ASHP scenario) • Sustainability Statement (including BREEAM Communities Assessment) prepared by XC02 (dated February 2022) • Whole Lifecycle Carbon Assessment prepared by XCO2 (dated June 2022) • WLC Assessment Template prepared by Karakusevic Carson Architects, East, Elliot Wood, XCO2 (dated 11 February 2022) • Relevant supporting documents. **1. Summary** The development achieves a site-wide reduction of carbon dioxide emissions on site by 65.4% (66% residential and 44% non-residential), which is supported in principle. Clarifications and further information must be provided with regard to the Energy Strategy, Overheating Assessment and Sustainability Strategy. Currently the scheme is not compliant with Policy SI2 (Be Lean), or SP4 (BREEAM). Furthermore, revised carbon reduction calculations need to be undertaken which will change the on-site carbon reduction figures and shortfall to offset within the wider estate. Appropriate planning conditions and obligations 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) confirms this in Policy SI2. The overall predicted reduction in CO_2 emissions for the development shows a site-wide improvement of approximately 65.4% in carbon emissions with SAP10 carbon factors, from the Baseline development model (which is Part L 2013 compliant). This	planning obligations will be secured as appropriate.

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represents an annual saving of approximately 252 tonnes of CO_2 from a baseline of 386 tCO_2/year.

London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are 198.9 tCO_2 (residential) and 9.7 tCO_2 (non-residential).

<table>
<tr><th colspan="4">Residential (SAP10 emission factors)</th></tr>
<tr><th></th><th>Total regulated emissions (tCO_2 / year)</th><th>CO_2 savings (tCO_2 / year)</th><th>Percentage savings (%)</th></tr>
<tr><td>Part L 2013 baseline</td><td>367.7</td><td></td><td></td></tr>
<tr><td>Be Lean</td><td>320.5</td><td>47.1</td><td>12.8%</td></tr>
<tr><td>Be Clean</td><td>320.5</td><td>0</td><td>0%</td></tr>
<tr><td>Be Green</td><td>122.3</td><td>197.2</td><td>53.6%</td></tr>
<tr><td>Cumulative savings</td><td></td><td>244.3</td><td>66.5%</td></tr>
<tr><td>Carbon shortfall to offset (tCO_2)</td><td>123.3</td><td></td><td></td></tr>
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<tr><th colspan="4">Non-residential (SAP10 emission factors)</th></tr>
<tr><th></th><th>Total regulated emissions (tCO_2 / year)</th><th>CO_2 savings (tCO_2 / year)</th><th>Percentage savings (%)</th></tr>
<tr><td>Part L 2013 baseline</td><td>18.3</td><td></td><td></td></tr>
<tr><td>Be Lean</td><td>15</td><td>3.3</td><td>18.1%</td></tr>
<tr><td>Be Clean</td><td>15</td><td>0</td><td>0%</td></tr>
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Stakeholder (LBH)	Comments	Response

Be Green	10.2	4.8	26%
Cumulative savings		8.1	44.1%
Carbon shortfall to offset (tCO_2)	10.2		

Site Wide (SAP10 emission factors)			
	Total regulated emissions (tCO_2 / year)	**CO_2 savings (tCO_2 / year)**	**Percentage savings (%)**
Part L 2013 baseline	386		
Be Lean	335.5	50.4	13.1%
Be Clean	335.5	0	0%
Be Green	133.6	202.4	52.3%
Cumulative savings		49	65.4%
Carbon shortfall to offset (tCO_2)	133.6		

NB: Savings of the preferred heating solution (air source heat pumps) have been included under the Be Green stage, but are discussed under the Be Clean section of this response.

Actions:

- The DEN Scenario has been calculated with SAP2012 carbon factors, please re-submit this with SAP10 carbon factors and a bespoke carbon factor for the supplied heat (see the Be Clean section). The advice from the GLA was amended in light of the publication of Part L 2021, for applications submitted before the new Building Regulations were implemented.

Energy – Lean

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The applicant has proposed a saving of 5.8 tCO_2 in carbon emissions (residential; 8% reduction) and a 8.7 tCO_2 saving (non-residential; 25% reduction) with SAP2012 carbon factors. The residential element of the proposal does <u>not</u> meet the minimum 10% reduction, whereas the non-residential element goes beyond the 15% reduction respectively set in London Plan Policy SI2.

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">0.10 W/m^{2}K</td></tr>
<tr><td>External wall u-value</td><td colspan="2">0.15 W/m^{2}K</td></tr>
<tr><td>Roof u-value</td><td colspan="2">0.10 W/m^{2}K</td></tr>
<tr><td>Windows and doors u-value</td><td colspan="2">1.30 W/m^{2}K</td></tr>
<tr><td>G-value</td><td colspan="2">0.50</td></tr>
<tr><td>Air permeability rate</td><td>3 m^3/hm^2 @ 50Pa</td><td>4 m^3/hm^2 @ 50Pa</td></tr>
<tr><td>Ventilation strategy</td><td>Natural ventilation + mechanical ventilation with heat recovery (MVHR)</td><td>Natural ventilation + mechanical ventilation with heat recovery (MVHR; Specific Fan Power 0.8 W/l/s; 0.7 efficiency)</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>Occupant sensors for areas of infrequent use; daylight sensors for areas with daylight</td></tr>
</table>
</td><td></td></tr>
</table>

<table>
<tr><th>Stakeholder (LBH)</th><th>Comments</th><th>Response</th></tr>
<tr><td></td><td>
<table>
<tr><td>Heating system (efficiency / emitter)</td><td>94% efficient gas boilers (Be Lean), underfloor / radiators</td><td></td></tr>
<tr><td>Cooling system</td><td>N/A</td><td>Air source heat pumps with an active cooling demand of 60.2 MJ/m^2 and 75,900 MJ/year below the notional building</td></tr>
<tr><td>Improvement from the target fabric energy efficiency (TFEE)</td><td>Moselle: 6.5%, from 52 to 48.6 kWh/m^2/year
Tangmere: 4.9%, from 51.1 to 48.6 kWh/m^2/year
Northolt: 4%, from 44.6 to 42.8 kWh/m^2/year
Townhouses: 9.1%, from 67.8 to 61.6 kWh/m^2/year</td><td>N/A</td></tr>
</table>
<u>Actions:</u>
- The Be Lean reduction for residential areas should meet the minimum requirement of a 10% reduction in emissions. New dwellings should also aim to have a space heating demand close to the 15-20 kWh/m^2/year target. Please set out what measures will be incorporated to ensure that the development is policy compliant.
- The Be Lean heating solution should be the same as the baseline assumptions, i.e. communal gas boilers.
- What is the assumed thermal mass?
- How many air changes, what efficiency and specific fan power is assumed for the MVHR units?
- The heat losses through thermal bridging should be improved upon; what is the proposed strategy to address this at detailed design stage?
</td><td></td></tr>
</table>

Stakeholder (LBH)	*Comments*	*Response*
	- Provide the energy demand summary for the non-domestic spaces, delivered energy requirement at point of use in MWh/year and by use. Overheating is dealt with in more detail below. **Energy – Clean** London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs. The Be Clean strategy proposes two strategies: - <u>Preferred</u>: Hybrid electric and gas boiler strategy in a central energy centre, powered by air source heat pumps. - <u>Alternative</u>: Connection of the BWF energy centre to the Energy from Waste (EfW) plant in Edmonton. **Heat Mix** It is unclear what assumptions have been used in terms of the heat mix for the ASHP and DEN options. Specifically: 1) For the ASHP option: a. 2 heat sources are provided as expected – gas boilers and ASHP	

Stakeholder (LBH)	***Comments***	***Response***
	b. Details of the peak output from the boilers (5MW) and ASHPs (1.8MW) are provided as expected but the thermal store capacity is unclear (18m^3 on network side tbc) c. Details of SCOP (2.7) and boiler efficiency (94%) have been provided. However; i. The boiler efficiency is very high – how has this been calculated? Please confirm this is gross efficiency and not net. ii. There is no further detail on what supply temperatures the SCOP has been calculated at. The same SCOP has been used for GSHP (which wasn't proposed) as ASHP (proposed). iii. It is unclear what the supply strategy for the ASHP and gas boiler is. *E.g. Gas boiler constantly raises ASHP temperature from 60 to 70^oC or Boiler supplies peak heat during low external temperatures.* This operational strategy needs to be explained and the modelling of the heat mix needs to reflect this. d. Details of proportion of heat from the ASHP (80)/boilers (20) is provided but critically no justification for this. There is an estimate of the heat provided by the ASHP and this is circa 1GWh which is <10% of the existing network load and just 566hrs runtime? Justification should include a detailed consumption profile for the entire expanded network and an hourly model taking into account demand, storage, plant capacity and cost of energy. e. Please provide a full explanation of the proposed installed capacities of ASHP, boiler plant, or thermal storage. f. An assessment of the distribution losses for the extension of the existing network is also now needed [SAP2012 had default losses whereas the calcs will need to be redone using the SAP10 methodology where a custom calculation is expected].	

Stakeholder (LBH)	*Comments*	*Response*
	There is a concern that there is insufficient thermal storage to maximise the utilisation of the ASHPs, especially as the cost of heat from the ASHP will be high unless peak electricity periods are avoided. It is also unclear what, if any conversations have been had with the DNO regarding necessary electrical infrastructure to the site to enable ASHP supply. 2) For the DEN option: a. For the purpose of the carbon calculations, the heat source should be 100% 'waste heat from a power station' and a BRE technical note details that this includes an allowance for gas boiler fraction of 3%. A 75:25 split has been incorrectly used and should be corrected. b. For information purposes only, a detailed consumption profile and an hourly model taking into account demand, storage, availability and plant capacity to calculate the heat mix deliverable by the proposed system. This should take into account details of the assumed capacity of boiler plant (5MW tbc), ERF plate (1.5MW tbc) and thermal storage (18m^3 tbc) for the ERF option. There is an expectation that a boiler fraction <10% should be achieved. c. An assessment of the distribution losses which should combine for: i. The primary network from Enfield to BWF – this should be 1.05 ii. The extension of the existing network [SAP2012 had default losses of 1.05 whereas the calcs will need to be redone using the SAP10 methodology. A custom calculation of DLFs is expected (rather than the defaults allowed for in SAP10 of 1.5) and this could be in the order of 1.2]. 3) Indicative running costs have been included in the report. While the report acknowledges these are preliminary estimates and more work will be done, they	

Stakeholder (LBH)	***Comments***	***Response***
	should be factoring in 1) cost of plant replacement, overheads and maintenance to comply with GLA guidance 2) the cost per unit of energy from SAP/SBEM is out of date and needs to be refreshed 3) for electricity in particular, they need to consider time of use which should be consistent with the work we have asked them to do in terms of evidencing the heat mix via detailed hourly demand profile and plant size/thermal stores 4) their energy usage only seems to apply to the newbuild rather than the entire network. **<u>Carbon Calculation – Heat Mix and Offset</u>** The heat mix used in the above carbon calculations should calculate the delivered carbon factor of heat assuming an average heat mix across the expanded DEN. A comparison should be provided which examines the carbon savings in the existing section of the DEN which will equate to: *(Total heat delivered in existing DEN) x [(current average delivered carbon factor) minus (future DEN average delivered carbon factor)]* This carbon saving (from decarbonising the existing network over and above the new scheme) can be used as an 'in kind' saving to avoid having to pay a carbon offset. Note the carbon offset requirement calculated for the new development is currently either; ASHP option has 4,006.6 tCO_2 for 30 years (£380,000) and the heat network option 3,566.8 tCO_2 for 30 years (£338,800) (noting that these offset amounts need to be recalculated as above and that this will reduce the carbon offset from the heat network) Once the additional carbon saving in the existing homes is calculated, it can be used to reduce the offset due on the new homes.	

Stakeholder (LBH)	***Comments***	***Response***
	Note the required recalculation of the carbon performance of the scheme set out above can be secured through an obligation or pre-commencement of superstructure condition. **<u>Energy centre facility and space planning</u>** • More evidence is required to demonstrate the energy centre space planning and design provision is adequate. This includes; ○ The outputs of the energy modelling and carbon calculations are to be used to provide greater evidence of the required plant capacity and thermal stores. ○ Details of the flue riser and where it is proposed to terminate (not shown on drawings). ○ A detailed schematic for both the DEN and ASHP options indicating hydraulic arrangement of plant and thermal stores including the evaporators, condensers and ERF connection. There appear to be multiple headers and pumps (as per layouts) connected to the thermal stores which need to be shown on a schematic. ○ Additionally, the schematic should show how the existing buildings and new buildings are proposed to be served (e.g. off different circuits or the same) and the temperature regimes for each. ○ Schematics should also be provided to indicate the proposed distribution strategy (i.e. HIUs and Radiators) and the temperatures of each circuit. ○ Electrical rooms – not shown. Is a separate RMU and transformer required? (Depending on the ASHP size and connection capacity). ○ Indicate suitable laydown areas for Energy Centre deliveries and plant replacement. ○ Review potential requirement for a dedicated energy centre sprinkler system and provide adequate space provision if this may be required.	

Stakeholder (LBH)	***Comments***	***Response***
	• There is a concern about the utility of the energy centre – in particular the floor to ceiling height is low (less than 4m) and there is expected to be a need for permanent lifting beams to facilitate plant movements for maintenance, and potential structural beams which will reduce the useable height further. It is unclear how the proposed thermal storage capacity can be accommodated in this space. A more detailed plant layout is required before the scheme can be approved. • Below ground services are noted to be "ducted in smooth bore" – if the services are to be buried in the ground (rather than in a service tunnel or duct) this proposal is not in compliance with the Council's DEN specification and pipework must be pre-insulated buried to enable access for maintenance / replacement. • Note that the boiler capacity is considered low. With the ASHP option, presumably the ASHPs can act as resilience but with the DEN option >5MW gas boilers will almost certainly be required and it should be demonstrated how this will be accommodated. • The proposed DEN pipework route to/from the energy centre to the site boundary should be shown. • The information above should be secured via a pre-commencement of superstructure condition/obligation. **General Comments** • The current strategy is targeting compliance against GLA guidance pre-June 22 and Part L 2013. It's expected that updates will be needed to the fabric	

Stakeholder (LBH)	*Comments*	*Response*
	specification to align with Part L 2021 which will have an impact on the estimated thermal demands. • The energy statement does not include a section on flexibility and peak energy demands – this is required by the GLA Energy Assessment guidance (section 11), which includes a requirement to provide: peak heat and electrical demand; establish available capacity; review opportunities for flexibility. • The design and delivery of the project must be in compliance with the Haringey Technical Specification July 2021 (attached). Compliance with this specification should be secured through a planning obligation or similar. • In order to demonstrate compliance with this specification, it is expected that developers would provide greater detail of a number of areas e.g. details of plant set down areas for disaster recovery, detailed peak load assessments and distribution loss assessments, etc (see attached checklist). These should be conditioned to be provided prior to commencement. Actions: - Please respond to the clarification and further information requests as set out above in the Heat Mix, Carbon Calculation, Energy centre facility and space planning, and General Comments sections. **Energy – Green** As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.	

Stakeholder (LBH)	***Comments***	***Response***
	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. The ASHPs have been discussed under Be Clean. The solar array peak output would be 332.69 kWp, which is estimated to produce around 253,000 kWh/year of renewable electricity per year, equivalent to a reduction of 59 tCO_2/year. The array of panels (with 19% efficiency) would be mounted on a roof area of 1,751 m^2, horizontally, facing south. <u>Actions:</u> - Clarify whether the solar peak power is 330 kWp (table 5) or 332.69 kWp (main body text). - Will any living roofs be installed under the solar PV arrays? - How will the solar energy be used on site (before surplus is exported onto the grid)? - What level of overshadowing has been assumed per block? **Energy – Be Seen** London Plan Policy SI2 requests all developments to 'be seen', to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies. The applicant should install metering equipment on site, with sub-metering by dwelling/ non-residential unit. A public display of energy usage and generation should also be	

<table>
<tr><th>Stakeholder (LBH)</th><th>Comments</th><th>Response</th></tr>
<tr><td></td><td>provided in any main entrance areas to the community buildings to raise awareness of renewable energy generation.

3. Carbon Offset Contribution
A carbon shortfall of 133.6 tCO_2/year of regulated carbon emissions remains. This is equivalent to 4,008 tCO_2 over 30 years.

Remaining carbon emissions to reach the zero-carbon target will be offset by an ‘over-provision’ of new low carbon heating to serve existing dwellings served by the upgraded energy centre. Further detail on this is included within the Be Clean section.

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 153 habitable rooms (100 bedrooms, 53 living/kitchen/open plans), 36 dwellings (out of 294 dwellings) and 0 corridors under the London Weather Centre files.

Results are listed in the table below.

<table>
<tr><th></th><th>TM59 – criterion A</th><th>TM59 – criterion B bedrooms</th><th>Number of habitable rooms pass TM59</th></tr>
</table>
</td><td></td></tr>
</table>

<table>
<tr><th>Stakeholder (LBH)</th><th>Comments</th><th>Response</th></tr>
<tr><td></td><td>
<table>
<tr><td>DSY1 2020s
Baseline (GF windows closed at night; g-value 0.63)</td><td>45/53
100/100</td><td>77/100</td><td>122/153</td></tr>
<tr><td>DSY1 2020s
Iteration 1 (GF windows closed at night; g-value 0.50)</td><td>52/53
100/100</td><td>84/100</td><td>136/153</td></tr>
<tr><td>DSY1 2020s
Iteration 2 (GF windows open with restrictors at night; second pane openable; g-value 0.50)</td><td>52/53
100/100</td><td>100/100</td><td>152/153</td></tr>
<tr><td>DSY1 2020s
Iteration 3 (GF windows open with restrictors at night; second pane openable; g-value 0.50; external shading >0.8m depth)</td><td>53/53
100/100</td><td>100/100</td><td>153/153</td></tr>
<tr><td>DSY2 2020s
Variation 3</td><td>8/53
97/100</td><td>13/100</td><td>21/153</td></tr>
<tr><td>DSY3 2020s
Variation 3</td><td>7/53
73/100</td><td>20/100</td><td>27/153</td></tr>
</table>

All rooms pass the overheating requirements for 2020s DSY1 based on Iteration 3 to the baseline. In order to pass this, the following measures will be built:
- MVHR as the primary strategy
- Passive natural ventilation as the secondary strategy:
  ○ Ground floor windows 90° side open daytime, 10° (top) night-time with restrictors, and btm-hung 5° night-time for sliding doors
  ○ Upper floors 90° side hung all day; 30° top hung all day; with both panes openable
- Glazing g-value of 0.50
- External shading with >0.8m depth for GDT3-UF windows only, but not specified
</td><td></td></tr>
</table>

Stakeholder (LBH)	***Comments***	***Response***
	- No active cooling in the residential dwellings. Proposed future mitigation measures include: - Internal blinds, to be installed by residents - No further measures have been included. The submitted overheating strategy is considered acceptable in principle subject to further detail but further modelling at the detailed design stage is recommended to capture any design changes. <u>Overheating Actions:</u> - Model the non-residential spaces in line with CIBSE TM52, as the enterprise uses, wellbeing hub and retail unit will be occupied for a longer period of time and accommodate more vulnerable people (in the case of the wellbeing hub). - Model sample internal corridors within the scheme in line with CIBSE TM59. - Include floorplans indicating location, orientation and layout of sample dwellings. - What pipework heat losses have been assumed for HIU cupboards in dwellings and in corridors for the purposes of the overheating assessment? - How will the heat be purged in the night-time? How will this differ across the typologies? - What are the assumed air changes of the MVHR units per type of dwelling? Will it have a summer bypass? - What are the details of external shading measures, please include images/specification and show where these are applicable on floorplan/elevations. Please explain why type GDT3-UF windows will only have external shading.	

Stakeholder (LBH)	*Comments*	*Response*
	- What secure by design measures will be implemented to prevent the risk of crime to accessible habitable rooms (incl accessible balconies, terraces or open corridors)? Will these be sufficient to pass Building Regulations Part O for accessible habitable rooms relying on natural ventilation? - The applicant has not modelled the DSY1 2050s weather file for the development. Please also model this and ensure the current design has incorporated as many mitigation measures as feasible to ensure residents are more resilient during more extreme weather. Any remaining overheating risk should inform the future retrofit plan. - Please prepare a future retrofit plan (based on DSY2 and DSY3 2020s, DSY1 2050s). The retrofit plan should demonstrate what measures could be installed to mitigate future overheating risk, evidenced by further sample modelling. The future mitigation measures should be possible to retrofit when necessary. This should ensure, for example, that the structure can accommodate the fitting of additional shading or ventilation measures. These measures should be chosen in line with the Cooling Hierarchy, and it should therefore not focus on cooling but passive design measures. - Identify communal spaces (indoor and outdoor) where residents can cool down if their flats are overheating. **5. Sustainability** Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The Sustainability Report sets out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO_2 emissions and landscape design.	

Stakeholder (LBH)	*Comments*	*Response*
	Site-Wide BREEAM Communities Assessment The applicant has prepared a BREEAM Communities Pre-Assessment Report. This holistic approach to sustainability is supported and it will continue to help shape the development with a social and economic wellbeing community focus as part of the wider Broadwater Farm Estate proposals, master planning and improvements. A 'Very Good' rating should be achievable according to the Pre-Assessment, with an aspiration to achieve 'Excellent'. The tracker assessed that a score of 66.93% is achievable for all three stages of the BREEAM Communities Assessment. ***Non-Domestic BREEAM New Construction Requirement*** Policy SP4 requires all new non-residential spaces to achieve a BREEAM New Construction rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable. The applicant has <u>not</u> confirmed that BREEAM New Construction accreditations are being sought for individual commercial and community spaces in addition to the BREEAM Communities accreditation. ***Urban Greening / Biodiversity*** All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. All landscaping proposals and living roofs should stimulate a variety of planting species. Amongst other benefits, these will increase biodiversity and reduce surface water runoff.	

Stakeholder (LBH)	***Comments***	***Response***
	The development achieves an Urban Greening Factor of 0.4, which complies with the interim minimum target of 0.4 for predominantly residential developments in London Plan Policy G5. A potential biodiversity net gain of +128.87% would also be achieved through the introduction of shrubs, amenity grassland, neutral grassland, tree planting, extensive green roofs and rain gardens. ***Living roofs*** All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. 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. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The 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. ***Climate Change Adaptation*** Developments of this size should have a climate change adaptation strategy in place for residents and visitors 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. Only surface water flooding has been considered within the Sustainability Report as part of climate change adaptation. ***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	

<table>
<tr><th>Stakeholder (LBH)</th><th>Comments</th><th>Response</th></tr>
<tr><td></td><td>
emissions. The updated WLCA has been reviewed, following amendments to respond to GLA comments on the original report.

The total calculated emissions based on the GIA (with SAP10 carbon factors and without grid decarbonisation), based on the submitted spreadsheet, is estimated at:

<table>
<tr><th></th><th>Estimated carbon emissions</th><th>GLA benchmark</th><th>Embodied carbon rating (Industry-wide)</th></tr>
<tr><td>Product & Construction Stages Modules A1-A5 (excl. sequestration)</td><td>812 $kgCO_2e/m^2$</td><td>Meets the GLA benchmark (<850 $kgCO_2e/m^2$) and misses the aspirational target (<500 $kgCO_2e/m^2$).</td><td>Modules A1-A5 achieve a letter band rating of ‘D’, not meeting the LETI2020 Design Target.</td></tr>
<tr><td>Use and End-Of-Life Stages Modules B-C (excl. B6 and B7)</td><td>279 $kgCO_2e/m^2$</td><td>Meets GLA target (<350 $kgCO_2e/m^2$) and aspirational benchmark (<300 $kgCO_2e/m^2$).</td><td>N/A</td></tr>
<tr><td>Modules A-C (excl. B6, B7 and incl. sequestration)</td><td>1,039 $kgCO_2e/m^2$</td><td>Meets GLA target (<1200 $kgCO_2e/m^2$) but not the aspirational benchmark (<800 $kgCO_2e/m^2$).</td><td>Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of ‘E’, not meeting the LETI2020 Design Target.</td></tr>
<tr><td>Use and End-Of-Life Stages Modules B6 and B7</td><td>814 $kgCO_2e/m^2$</td><td colspan="2">N/A</td></tr>
</table>
</td><td></td></tr>
</table>

Stakeholder (LBH)	*Comments*	*Response*

Reuse, Recovery, Recycling Stages Module D	-16 $kgCO_2e/m^2$	N/A

The highest embodied carbon in Modules A1-A5 is attributed to Module A3 (product stage; 33%) due to the volume of reinforced concrete; B6 Operational Stage (16%); and Operational water use (16%). The highest building component emissions are services (MEP; 46%); superstructure (54%) under Modules A1-A5; and building finishes (40%) under Modules B1-B5 and C.

Several areas have been identified to calculate more accurately and to reduce the embodied carbon of the buildings. This includes a partial cement replacement with Ground Granulated Blast-furnace Slab (GGBS) by 50% and aluminium timber hybrid windows, reducing the WLC by 153 $kgCO_2/m^2$ and 20 $kgCO_2/m^2$ respectively. In addition, the potential for a lime-mortar mix has also been considered, with a potential to reduce the WLC by 9.78 $kgCO_2/m^2$.

WLC – Demolition emissions
The Pre-Construction demolition carbon-related emissions have broadly been calculated at 50 $kgCO_2e/m^2$ by GIA for the existing areas, bringing the total non-residential emissions to be 92,400 $kgCO_2e$ and 1,004,650 $kgCO_2e$ for the residential areas.

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.

Stakeholder (LBH)	***Comments***	***Response***
	The updated CES has been reviewed, following amendments to respond to GLA comments on the original report. The principles used for this development are: • Source materials responsibly • Design for longevity (>60 years lifespan), durability and resilience • Design for use over different life stages (residential) and • Design for adaptability and disassembly (commercial / community) • Implement measures to optimise material use • Reuse existing material(s) • Carry out a pre-demolition waste audit • Implement waste minimisation targets during demolition and construction • Ensure there is sufficient space for storage and segregation of operational waste • Design a flexible and adaptable building, particularly with regards to non-residential spaces The report sets out the Key Commitments (Table 2), Bill of materials (Appendix B) and Recycling and waste reporting form (Appendix B). This is a fairly high level of information, and the applicant expects this to become more detailed as the detailed design progresses following permission. The structural engineering team identified that the existing buildings were not suitable for repurposing and re-use due to loads and structural integrity, damp, surface water penetration, poor airflow. A pre-demolition audit is being undertaken currently for Northolt, with the aim to maximise recovery, reuse, and recycling of demolition waste. Any demolition waste would be used as fill material, within buildings or landscaping. The End-Of-Life Strategy includes durability, design for disassembly, material passports, layer independence and standardisation.	

Stakeholder (LBH)	***Comments***	***Response***
	Overall Sustainability Actions: - Submit a BREEAM Pre-Assessment for the commercial and health/community spaces. A table should be submitted to demonstrate which credits will and will not be met, and potentially met, with justification where targets are not met (where they are available under the Shell and Core assessment). - Identify what water collection and reuse points will be delivered on the site to reduce water use by residents and for maintaining the landscaping. The use of drought-resistant planting, rainwater harvesting (individual and shared), and water storage tanks can be proposed as complementary measures. Attenuation tanks are being proposed to reduce surface water flood risk, so the use of the stored water should be reconsidered. - Identify in what ways the development will increase the resilience of residents and businesses and adapt their buildings and public realm to the impacts of climate change. This should also include annotated plans showing what parts of the public realm can be used in what capacity for different types of weather (e.g. shaded seating and play areas, play areas and seating in the sun for shoulder months, mitigating against and taking advantage of the wind direction). - What work was done to assess the current areas where surface water pools on site during heavy rain events, and how has this been incorporated into the SUDS strategy? - The development should look to allocate a publicly accessible 'cool space', following the GLA's criteria for cool spaces and to form part of the wider cool spaces map. - The Community Park includes a re-provided park for residents; the image in the DAS (p. 108-109) shows water features, how will these water features be designed to create play opportunities for children both during hot weather and during rainy days? Will it make use of rainwater or be a closed system? - The opportunity for further hedge planting should be explored within the public realm areas as hedges provide significant biodiversity benefits.	

Stakeholder (LBH)	***Comments***	***Response***
	- Please submit an updated WLC spreadsheet; e.g. Modules A1-5 excl. sequestration (843 $kgCO_2e/m^2$) do not match the figure in the spreadsheet (812 $kgCO_2e/m^2$) for assessment 1. - Please justify why streets include on-street car parking in an estate that is already dominated by underground car parking. Who will the proposed parking spaces be allocated to? And, please justify why the school parking needs to be re-provided at a time when schools also need to be decarbonising. Furthermore, the location of the school car park means there will be car movements in and out of the car park which may reduce the success of the linear public realm created by this proposal. **Planning Conditions** To be secured (with detailed wording TBC): - Energy Plan, including the requirement to calculate the carbon offset mechanism - Sustainability Review - DEN Connection - Overheating (Residential and Non-Residential) - BREEAM Certificate (Communities and New Construction) - Living roofs - Circular Economy (Pre-Construction report, Post-Completion report) - Whole-Life Carbon Assessment - Be Seen - Biodiversity - Pre-demolition audit reuse opportunities **Planning Obligations Heads of Terms** - To be confirmed following submission of further information.	

Stakeholder (LBH)	*Comments*	*Response*
Tree Officer	• Tree planting to re place tree loss, with an overall future canopy net gain and further planting for the phased development • Arboriculturist to be kept on through the development and a period afterwards • Five-year aftercare programme for establishment and independence in the landscape for the tree planting and landscaping • Replacement for all tree losses • Species list and specification for re planting Further, the Tree Protection Plan within the Tree Survey report, will need to be conditioned along with Arboricultural Method Statements for any proposed works within the root protection area. The overall Tree survey report will need to be adhered to and conditioned. Consensus is a wildlife survey will need carried out again with regards to the spotted Peregrine Falcon/s. This will need to be done March- April prior to any potential nesting and before the demolition of Northolt Tower.	Comments have been taken into account. Appropriate conditions will be secured.
Flood and Water Management Officer	Having reviewed the applicant's submitted, Flood Risk Assessment Report reference number 2190497, Revision P3, dated March 2022 prepared by Elliotwood Engineer along with the Sustainable Urban Drainage Strategy, 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 the surface water generated by this	Comments have been taken into account. Appropriate conditions will be secured.

Stakeholder (LBH)	*Comments*	*Response*
	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. 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**	
Waste Management Officer	This is a large mixed use development that will deliver 290 homes. The transport planning consultant used to develop the waste management strategy for this application has a very good understanding of the sector and the council's specific requirements regards waste and recycling storage, containment and collection. The Operational Waste Management Strategy supporting this application is comprehensive and compliant.	Comments have been taken into account.

Stakeholder (LBH)	***Comments***	***Response***
	The four townhouses proposed on the Moselle site will/can be served by individual 240l wheeled bins for refuse and mixed dry recycling, and food waste caddies for the collection of this waste stream. Refuse will be collected fortnightly from these units with the other waste streams collected each week. It is positive to see provision of internal storage and separation proposed for these and indeed all units across this development. Bins will be stored on the frontage of these properties, collected and returned on the day of collection in operation as is acknowledged. The remaining 286 units across the 4 blocks and 10 cores will be served by communal bins for the three waste streams. Bin calculations for each waste stream for each of the cores, as set out on table 3-6 are accurate, with the 240l bins for food waste (rather that 360l bins that are no longer used) included. The location of the bin stores as indicated on the site plans in conjunction with the swept path analysis included in Appendix B show that these are both within accepted collect and return distances for crew and each to be accessible for the communal bin collection vehicle. For cores NH1 and NH2 the RCV will need to access the bins via a shared surface with access controlled by automated bollards. Some further detail on how this will work in operation would be welcome to ensure collections are made as scheduled, without issue. For example, will the crews be issued with fobs to control the bollards or will this be managed by the on site facilities management team? What contingency will be in place should the bollards fail or require repair for an extended period? Will the on site team support the collection crews by presenting the bins outside the bollards? If these questions could be addressed that would be helpful. Three bulky waste stores are indicated and this is again positive to ensure occupants can place out bulky waste off street at ground level for collection (booked via the council as is acknowledged). The on site estate facilities management is positive and will assist in managing both bulky waste and refuse stores.	

Stakeholder (LBH)	***Comments***	***Response***
	Regarding the commercial element of the development, the waste produced from these units will be commercial waste and will not be collected by the council or its contractors as part of our statutory collection duties. The is acknowledged and the onus for developing individual plans and managing the waste appears to be placed on the eventual tenants of the units through lease conditions. This is a positive approach as the waste generated will depend on the type of businesses that occupy the development/units in operation, the waste/recycling they generate, and the contracts put in place for the collection of this. Commercial waste collection companies can provide up to twice daily collections 7 days per week. We would however advise against sizing the bins stores based on minimum size and maximum collections. The stores should be sufficient to store waste generated from the units in operation for one week. This supports reduced vehicle movement and also provides some contingency for when collections are disrupted as we have seen regularly over the last 2 years - covid, HGV driver shortages, fuel issues, industrial action etc. These should also be completely separate from the domestic bin stores and this has been incorporated into the plans.	
Pollution Officer	Having considered all the submitted supportive information i.e. Design and Access Statement dated March 2022, Energy Statement prepared by XCO_2 Ltd dated February 2022 taken note of the proposed use of ASHP and gas fired boilers as energy source, Air Quality Assessment report prepared by XCO_2 Ltd dated 27th January 2022 taken note of the applicant submission on baseline air quality, potential impacts exposure assessment, air quality neutral assessment, mitigation, summary and conclusions as well as the Geotechnical & Geo-environmental Interpretative Report with reference CG/38532 prepared by Card Geotechnics Ltd dated August 2021 taken note of sections 4 (Preliminary Risk Assessment), 6 (Ground and Groundwater Conditions), 7 (Contamination Assessment), 8 (Geo-environmental Recommendations) and Table 20 (Quantitative Risk Assessment), **please be advise that we have no objection to the proposed development in relation to AQ and Land Contamination but the following**	Comments have been taken into account. Appropriate conditions will be secured.

Stakeholder (LBH)	*Comments*	*Response*
	planning conditions and informative are recommend should planning permission be granted. **1. <u>Land Contamination</u>** Using the information already provided in section 8 (Geo-environmental Recommendations) of the Geotechnical & Geo-environmental Interpretative Report with reference CG/38532 prepared by Card Geotechnics Ltd dated August 2021, the applicant shall undertake before the occupation of the development: a. All remediation work detailed in the report with a verification report that the required works have been carried out. This shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. **<u>Reason:</u>** To ensure the development can be implemented and occupied with adequate regard for environmental and public safety. **2. <u>Unexpected Contamination</u>** 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. **<u>Reasons:</u>** 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. <u>Updated Air Quality Assessment</u>**	

Stakeholder (LBH)	*Comments*	*Response*
	Whilst the submitted Air Quality Assessment report prepared by XCO2 Ltd dated 27th January 2022 is noted however, considering the distance of the proposed development to the monitoring sites which were used as baselines, likely operational effect of the development on the occupiers of Kenley building which we understand is 65m high and nineteen storeys which the applicant has refused to be explicit on its location in relation to the energy centre, identified risk of medium to high during the demolition, earthworks, construction and track out with the fact that, the development is not AQ neutral with respect to transport – related emissions 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 of the development beyond the current 7th floor as submitted for the purposes of reaching a conclusion on development significance effects in the actual site and overall local air quality. • 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 nor Defra mapped background concentrations. • Provision of Predicted NO_2 Concentrations beyond 2020 as currently submitted. This needs to be submitted for building operational commencement year and a couple of year following this completion. **Reason:** To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction. **4. <u>NRMM</u>**	

Stakeholder (LBH)	*Comments*	*Response*
	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: a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).	

Stakeholder (LBH)	***Comments***	***Response***
	b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include: i. A construction method statement which identifies the stages and details how works will be undertaken; ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding; viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance); ix. Details of external lighting; and, x. Details of any other standard environmental management and control measures to be implemented. c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on: i. 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	

Stakeholder (LBH)	*Comments*	*Response*
	vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching. d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include: i. Mitigation measures to manage and minimise demolition/construction dust emissions during works; ii. Details confirming the Plot has been registered at http://nrmm.london; iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection); v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate. **The development shall be carried out in accordance with the approved details as well as on the applicant submitted proposed mitigation in the Air Quality Report and operational impacts mitigation measure i.e. A Framework Travel Plan developed to encourage sustainable travel and minimise vehicle trips associated with the site following the failure of the Transport Emissions Benchmark (TEB) by the development.** **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.**	

Stakeholder (LBH)	*Comments*	*Response*
	Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality." **6. Combustion and Energy Plant** Prior to installation, details of the gas boilers to be provided for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 36 mg/kWh (0%). **Reason**: As required by The London Plan Policy 7.14. **7. Combined Heat and Power (CHP) Facility** Prior to the commencement of the development, details of the NOx Natural Gas – Fired Boilers (CHP) facility of the energy centre or centralised energy facility or other centralised combustion process and associated infrastructure shall be submitted in writing to and for approval by the Local Planning Authority. The details shall include: a) location of the energy centre; b) specification of equipment; c) flue arrangement; d) operation/management strategy; and e) the method of how the facility and infrastructure shall be designed to allow for the future connection to any neighbouring heating network (including the proposed connectivity location, punch points through structure and route of the link) f) details of CHP engine efficiency	

Stakeholder (LBH)	***Comments***	***Response***
	The Combined Heat and Power facility and infrastructure shall be constructed in accordance with the details approved, installed and operational prior to the first occupation of the development and shall be maintained as such thereafter. **Reason:** To ensure the facility and associated infrastructure are provided and so that it is designed in a manner which allows for the future connection to a district system. **Informative**: 1. Prior to 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. 2. With a number of exceedances said to be recorded in the groundwater though alluded not to pose a risk to controlled waters in section 7.4 (Risks to controlled waters) of the contaminated land report, we however suggest comment from Environment Agency be sought in this regard as well as that of water supply company to confirm their requirements for water supply pipes.	
Policy Officer	Principle of development Local Plan Policy SP2 identifies Broadwater Farm as a priority for the Council's programme of strategic improvements/ renewals. The site falls within the Broadwater Farm site allocation (reference: SA61) which is expected to deliver "improvements of the housing estate to improve stock, design of the site, and routes through the area". No capacity has been identified as part of the site allocation. The site requirements state that an SPD will be prepared in consultation in with existing residents to assess existing issues within the area and options to address them. No SPD has been	Comments have been taken into account.

Stakeholder (LBH)	***Comments***	***Response***
	produced; however, it is considered that the Urban Development Framework created with residents and key stakeholders such as the Canal & River Trust sufficiently addresses the objectives of an SPD as set out in the allocation, in conjunction with the more detailed information provided in the Design and Access Statement. The proposed residential led development, with accompanying infrastructure and public and open space provision, and improved connectivity generally accords with the Local Plan Strategic Policies Development Plan Document (DPD) and Site Allocations DPD. <u>Proposed Retail Floorspace</u> A small amount of retail space is proposed outside of existing centres. Given its small scale and purpose to contribute to a sense of place for the regenerated neighbourhood, it is considered that this is acceptable and would not result in any harm to nearby local centres. <u>Affordable housing</u> Local Plan Policy SP2 seeks to achieve an affordable housing tenure split of 60% affordable rent (including social rent) and 40% intermediate rent. The preferred affordable housing mix, in terms of unit size and type of dwellings on schemes is expected be determined through negotiation, scheme viability assessments and driven by up-to-date assessments of local housing need, as set out in the Haringey Housing Strategy. All units from the scheme will be Social Rented tenure (save for any returning leaseholders). While this does not achieve the mix set out in policy, it responds to the greatest identified housing need for Social Rented housing and is therefore supported. <u>Placemaking</u>	

Stakeholder (LBH)	***Comments***	***Response***
	We are supportive of efforts to safeguard the potential daylighting of the Moselle River and the references to the river in design (i.e. through the water feature and water grilles). <u>Transport & Access</u> We are supportive of the proposals to improve links to the Lordship Recreation Ground, tie into the Green Grid in line with SA 61 development guidance.	
Community Safety Officer	The Community Safety teams do not oppose the Broadwater Farm planning application ref. HGY/2022/0823 as there is no evidence to suggest that the redevelopment proposals would impact the community in a negative way. We draw attention to the comments made by 'Metropolitan Police Designing Out Crime Office and recommendations contained within the Environmental Visual Audit and for action against these to be considered as part of the redevelopment wider action towards crime prevention. We also note the need for continued attention towards formal and informal engagement and consultation with those aged under 18, considering the presented Equalities Impact Assessment, the impact of development is not fully expressed and will need to be subject to ongoing review.	Comments have been taken into account.
Noise Officer	I have reviewed the documents submitted in respect to the above development. No further information is required in respect of the potential impacts of plant on the nearest noise sensitive receptors. The applicant will need to confirm they will implement the noise mitigation measures as outlined in the assessment or, where this is not used, that other mitigation measures achieve the same, namely - thermal double glazed windows to achieve a minimum sound insulation of 27dB Rw + Ctr - mechanical ventilation with heat recovery suitably attenuated to control intrusive noise (not exceeding 25 dB LAeq)	Comments have been taken into account. Appropriate conditions will be secured.

Stakeholder (LBH)	***Comments***	***Response***
	We recommend that the premises shall not be brought into use until compliance with the above has been assessed and details submitted to and approved in writing by the Local Planning Authority.	
Public Health	We had some questions around the health centre relocation and capacity, particularly around meeting the needs of residents, but have spoken to colleagues from the NHS NCL ICB and Estates who have answered the concerns and have been involved throughout the development process. One comment would be ensuring the Community Park is easily navigable for visitors in a wheelchair or with mobility issues, there is limited detail to understand that this has been taken into consideration. We have no other comments or objections and are in support of the application. It is great to see the inclusion of a playable water feature inspired by the existing waterfall mural which we believe will have a positive impact on the health of local residents, particularly during hotter days.	Comments have been taken into account.
LBH Parks	No comments to make.	Noted.
LBH Street Lighting	No comments to make.	Noted.

Stakeholder (External)	*Comments*	*Response*
Greater London Authority	See full publication of their Stage 1 comments in the section below.	Noted. See below.
Health & Safety Executive	Latest set of comments: **HSE's outstanding concerns** 1.4 For ease of reference, following a review of the information provided by the applicant, HSE maintains the following concerns: • Means of escape, including single staircases made vulnerable by connection with ancillary accommodation including places of special fire hazard and similar fire risk. • Means of escape, including the provision of external staircases serving flats on upper floors. • Fire service access, including firefighter travel distances. 1.5 The above concerns have not been resolved to HSE's satisfaction. The resolution of these concerns is likely to affect land use planning considerations such as the design, layout, appearance and landscaping of the development. If the applicant is unable or unwilling to resolve these concerns, then an impasse will have been reached. In such circumstances it is likely that HSE's response to future consultations will be to suggest refusal of planning permission. **The applicant's response** 1.6 In relation to single staircases in the Northolt and Tangmere buildings serving ancillary accommodation, including places of special fire and similar fire risk (such as plant rooms, refuse stores and bike stores), the applicant's response states: '*The fire safety strategy addresses the proposed links between the ancillary accommodation spaces and the single escape stairs. To support the current design each ancillary space will be separated from the single stair by a high-level of compartmentation, and a protected and ventilated lobby.*	Comments have been taken into account. Discussions are ongoing to address comments as necessary. Fire safety conditions would be secured as appropriate.

	The protected lobby between each ancillary space and the single stair will be provided with mechanical smoke ventilation. The smoke ventilation system will be designed to maintain tenable conditions in the lobby and protect the stair against the ingress of smoke during both means of escape and firefighting phases. The current design will be supported (in the next design stage) by a quantitative fireengineered justification using CFD modelling to confirm that the proposed smoke ventilation system meets the functional requirements of the Building Regulations 2010. An independent fire load assessment will also be undertaken to ensure the various potential fire scenarios are considered as part of the CFD study and demonstrate that a fire load within the proposed amenity space will not result in great risk to other areas connecting to means of escape stair. *It is acknowledged that the smoke ventilation strategy varies depending on the floor level. Thus, it is proposed that CFD modelling will be carried out during the next design stage to demonstrate the performance of the smoke ventilation strategy on different floor levels. A Design Intent Note will be provided during the next design stage to outline the general proposals, methodology, and assumptions of the proposed fire-engineered analysis (i.e., CFD modelling) for the smoke ventilation systems in the lobbies/common corridors.* *The Design Intent Note will be presented to the Building Control body and other stakeholders with the objective of agreeing the principles of the fire-engineered approach prior to undertaking the modelling.* *The impact of different fires (residential, ancillary spaces, plant rooms etc.) on the smoke ventilation system protecting the single escape stairs will be considered as part of this study*.' 1.7 The applicant's comments are noted. However, as previously stated, the fire safety standard cited in the fire statement, *Approved Document B Volume 1* ('ADB'), states: *'Where a common stair **is not part of the only escape route from a flat**, it may also serve ancillary accommodation from which it is separated by a protected lobby or protected corridor.*	

	Where a stair serves an enclosed car park or place of special fire hazard, the lobby or corridor should have a minimum 0.4m2 of permanent ventilation or be protected from the ingress of smoke by a mechanical smoke control system.' 1.8 Accordingly, the connection of staircases and ancillary accommodation including plant rooms and bin stores, by way of smoke vented lobbies is only appropriate in multistaircase, not single staircase buildings. 1.9 The applicant's assertion that the connection of ancillary accommodation by way of smoke vented lobbies is to be a fire engineered solution is noted. Alternative solutions to the prescriptive guidance in ADB are possible. However, as stated in ADB, if alternative, fire engineered methods are adopted, the overall level of safety should not be lower than the approved document provides. Given that the connection of single staircases and ancillary accommodation by way of lobbies is not permitted in ADB, it is not considered that proposing such connections as an alternative engineered solution affords an equivalent level of safety to ADB. Design changes necessary to resolve this issue will affect land use planning considerations such as the layout and appearance of the development. 1.10 In relation to external spiral staircases as means of escape, the applicant's response states: '*Design alterations will be made to ensure the stair is enclosed with fire-resisting construction on three sides, with the fourth side remaining open to the outside. The figure below indicatively illustrates how the proposed design will be altered for the spiral staircase, with the red lines representing construction achieving the same level of fire resistance as the elements of structure.* *The semi enclosure to the stair will be expected to achieve the following:* *• Permanent smoke ventilation directly to outside.* *• Fire resisting protection from adjacent flats.* *• An alternative means of escape in the event of fire.*	

	Based on the above, the proposed design is expected to meet the functional requirements of the Building Regulations 2010 and will be discussed with the approving authorities in the next design stage.' 1.11 The design changes stated in the applicant's response are noted. However, a semienclosed spiral staircase will be open to the adverse weather conditions such as rain, ice and snow rendering this impractical as a means of escape form higher storeys. As previously stated the adopted fire safety standard, ADB, states at para 3.67: '*Where more than one escape route is available from a storey (or part of a building), then some of the escape routes from that storey or part of the building may be by way of an external stair provided all of the following conditions are met:…The stair serves a floor not more than 6m above…the ground level…'*. 1.12 Drawings show the external staircases serving floors 9m from ground level. Accordingly, external staircases are not considered suitable in this instance. Design changes necessary to resolve this issue will affect land use planning considerations such as the layout and appearance of the development. 1.13 In relation to excessive firefighter travel distances, the applicant's response states: '*The 37m travel distance is measured from the firefighting stair door to entrance door of furthest flat. This includes travel from within the lift lobby.* *In our view, the proposed lift lobby would be used as command post or control centre during firefighting operations. A door to external balcony can be opened manually by the fire fighters if they wish to allow additional ventilation. Therefore the overall travel distance for firefighters that impacts on the firefighter's physiology would only be expected as they travel along the corridor which is measured to be up to 28m. Typically travel distances will be measured as fire hose distance from the dry riser outlet to the furthest point in a flat. Standard guidance like ADB (or BS 9991 and BS 9999) would allow a maximum fire hose distance of 45m for unsprinklered; and 60m for sprinklered environments. Standard guidance does not specifically restrict maximum travel distance for firefighters.* *Please note that the proposed fire safety strategy for Broadwater Farm follows the guidance set out in ADB which does not refer to the guidance presented in PD 7974-5 to meet the functional requirements of Building Regulation B5.*	

	In paragraph 15.7, of the Approved Document B, Volume 1 (2019, with 2020 amendments)[ADB, Vol 1, 2019], it is recommended that in any building, the hose laying distance should meet a maximum of 60m from the fire main outlet in a firefighting shaft, or 45m where sprinklers have not been provided. This paragraph also refers to Diagram 15.3 (ADB, Vol 1, 2019) which illustrates the maximum hose laying distances from the fire main outlets in the firefighting shaft. This diagram considers single-direction travel up to 60m to be acceptable in a building provided with sprinkler protection. There is no suggestion that an additional firefighting shaft should be provided to further limit the firefighter's travel distances. *Based on the above, the proposed travel distances for firefighters in the event of fire are expected to meet the functional requirements of the Building Regulations 2010 and will be discussed with the Approving Authorities in the next design stage.*'. 1.14 The applicant's comments are noted. However, as previously stated the British Standard relating to fire service intervention (PD7974-5) states: '*Irrespective of the corridor smoke control solution…design should take into account the limitations necessarily imposed by firefighter physiology. Therefore, single direction travel distances within common corridors* ***should not exceed 30 m between the furthest flat entrance door and the stairwell door'***. 1.15 Likewise, guidance on smoke control in blocks of flats states: '*designers should be aware that single direction travel distances over 30m in length (measured from the staircase door to the furthest flat entrance door) in common escape routes are considered to present onerous conditions for fire fighters even if the flats are fitted with suppression systems. Therefore single direction corridor lengths over 30m are outside the scope of this guidance and it is recommended that they are not proposed*'. 1.16 In light of the above guidance on smoke control and firefighter safety it is not considered that the proposed layout and dimensions of the development provide reasonable fire service access and facilities. Design changes necessary to	

	resolve this issue will affect land use planning considerations such as layout and appearance of the development. **2. Supplementary information** *The following points do not contribute to HSE's overall headline response and are intended only as advice for the applicant.* 2.1 In relation to Northolt ground floor drawing showing a refuse store door immediately adjacent, and at a right angle, to the door leading to the staircase in the north tower, the applicant's response states: '*In accordance with the recommendations of ADB, where a protected stair projects beyond, is recessed from or is in an internal angle of the adjoining external wall of the building, a minimum distance between an unprotected area of the building enclosure and an unprotected area of the stair enclosure will be 1,800mm. The portion of the wall between the two unprotected areas will be constructed to achieve the same level of fire resistance as the elements of structure for that block, for integrity and insulation (from inside the building only). Please see the figure below, illustrating the proposed change to the design'*. 2.2 This is noted and will be subject to later regulatory consideration.	
London Fire Brigade	No comments to make.	Noted.
Transport for London	1 Rail and bus trip generation Thank you for the further analysis. No contributions to capacity of bus or rail network required. 2 Willan Road and future two-way bus operation • We understand the overall scheme design to support pedestrian movement and minimise the risk of higher vehicle speeds, although the presence of parking bays may detract from the intention to support a Healthy Street. • TfL cannot confirm at this stage whether a 5.8m wide carriageway would be suitable for two-way bus working, and if it would improve the existing	Comments have been taken into account and conditions and planning obligations will be secured as appropriate.

	situation, given the range of other servicing vehicles which would need to use this access. • The introduction of two-way bus operation would be for the benefit of occupiers of the site and reduce journey times. • Designs for new infrastructure should not build in potential bottlenecks, which may affect the performance and operation of the bus network. • It will need to be clarified where an eastbound stop could be located in future, and if to do if any parking bays will need to be relocated • TfL would support close collaboration with the applicant and Haringey Council to review with TfL Engineering in the further detailed design work when the highway network proposals are being developed, with particular reference to corners and westbound and eastbound bus stop locations to assess if this will meet bus operational needs and identify locations where any obstructions would be removed or designed out to enable two-way working to operate along this section of Willan Road. • TfL would ultimately need to undertake a bus test to assess if the highway on completion would be suitable for two-way working. • TfL would need to undertake other work to assess the benefits of two-way working, in particular for ease of use of the network by users and journey time savings. • Any works to Willan Road will need to be secured by a Section 278 agreement. TfL will be pleased to provide details of the specifications and scope of work to support a design to enable the ease of delivery of two-way working. 3 Active Travel Zone and public realm interventions We understand that Haringey Council are securing contributions to the local highway network, which TfL supports. 4 5 & 6 Car Parking	

	Welcome the confirmation of beat survey time Welcome the clarification that this is outside of an Opportunity Area. It is noted that the overall parking provision is being reduced, and in line with the other measures to improve active travel routes and Travel Plans no further comment from TfL 7 Travel Plan Welcome that this will be secured. Subject to suitable obligations and conditions for TfL to be engaged in the detailed design of Willan Road within the redline, TfL would not object to this application. Additional comments: We're pleased that this shows where sections of road can be widened to provide a 6.0m width, which includes the 90 degree junction at the junction of Gloucester Road and Willan Road. There is still a section of 5.8m width carriageway, and this would need to rely on forward visibility to allow vehicles to wait and give away accordingly, which is considered acceptable in this location. The detailed design stage as part of Section 278 agreement will need to confirm the location for the safeguarded eastbound stop and swept path analysis, to ensure that any other vehicles could pass if there were a bus parked within each bus stop. Any works to Willan Road will need to be secured by a Section 278 agreement. TfL will be pleased to provide details of the specifications and scope of work to support a design to enable the ease of delivery of two-way working. TfL would support close collaboration with the applicant and Haringey Council to	

	review with TfL Engineering in the further detailed design work when the highway network proposals are being developed, with particular reference to street furniture, corners and westbound and eastbound bus stop locations to assess if this will meet bus operational needs and identify locations where any obstructions would be removed or designed out to enable two-way working to operate along this section of Willan Road. TfL would ultimately need to undertake a bus test to assess if the highway on completion would be suitable for two-way working. TfL would need to undertake other work to assess the benefits of two-way working, in particular for ease of use of the network by users and journey time savings. Subject to the highway designs being updated and secured via appropriate planning mechanisms, TfL would not object to this application being approved. I'll be pleased to assist with reviewing any conditions or obligations for committee report, please feel free to contact me if you have any queries.	
Environment Agency	Based on a review of the submitted information,the proposed development will only be acceptable subject to the following conditions: 1) Culvert Condition Survey (pre-development) 2) Culvert Post-development Condition Survey These conditions are in line with Paragraph 163 of the NPPF which states that 'When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere' and Policy DM28 of the Haringey Development Management Development Plan Document (DPD) which requires proposals to include a condition survey of existing watercourse infrastructure to demonstrate that it will adequately function for the lifetime of the development, and if necessary, make provision for repairs or improvements.' Conditions: Condition 1 - Culvert Pre-Development Condition Survey No development approved by this planning permission shall commence until a strategy for	Comments have been taken into account, conditions will be secured as appropriate.

	maintaining and improving the culvert has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components: A scheme, based on the condition survey "BWF Moselle Culvert Study" - to undertake any required improvements or repairs to the culvert identified in the survey prior to the construction works. The scheme shall include a plan for any required long-term monitoring and maintenance and a program for the improvements or repairs completion. The scheme shall be fully implemented and subsequently maintained, in accordance with the scheme's timing/phasing arrangements, or within any other period as may subsequently be agreed, in writing, by the Local Planning Authority. Reasons To prevent flooding on site and elsewhere by ensuring that the Moselle Brook culvert is in satisfactory condition which is commensurate with the lifetime of the development which is in line with Paragraph 163 of the NPPF and Policy DM28 of the Haringey Development Management Development Plan Document (DPD). Condition 2 - Culvert Post-Development Condition Survey The applicant shall carry out a post-development CCTV/structural survey of the culvert to demonstrate that the defects highlighted in the pre-development survey have been rectified and the development has not caused any adverse impacts on the structural integrity of the culvert within 90 days of the completion of the works. A copy of the CCTV survey shall be submitted to the LPA within 30 days. Any defects identified shall be made good at the applicant’s expense and to the LPA’s satisfaction within a time agreed with the LPA, in conjunction with the Environment Agency. Reasons To prevent flooding on site and elsewhere by ensuring that the Moselle Brook culvert is in satisfactory condition which is commensurate with the lifetime of the development which is in line with Paragraph 163 of the NPPF and Policy DM28 of the Haringey Development Management Development Plan Document (DPD). Informative Flood Risk Activity Permit The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption 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 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environmentagency.gov.uk 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. Advice to LPA/Applicant Asset liability The Environment Agency would like to remind the applicant that, in the absence of an alternative agreement or special transference of liability or contract, the owner of the asset remains responsible for the asset. The risk remains with the asset owner and this rs does not remove any of this liability from the owner or contractually responsible party. Riparian responsibilities As the Moselle Brook runs within the red line boundary, it is likely that you own a stretch of watercourse. This means you have riparian responsibilities. Responsibilities include (but are not limited to) the maintenance of the river at this location including the riverbank. Further information on this can be found here: https://www.gov.uk/guidance/owning-awatercourse Water Resources Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments. All new residential development are required to achieve a water consumption limit of a maximum of	

	125 litres per person per day as set out within the Building Regulations &c. (Amendment) Regulations 2015. However, we recommend that in areas of serious water stress (as identified in our report Water stressed areas - final classification) a higher standard of a maximum of 110 litres per person per day is applied. This standard or higher may already be a requirement of the local planning authority. We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.	
Natural England	Natural England has no comment on this application with regards to statutory designated sites. However, we note that the site is within the recreational pressure Zone of Influence for Epping Forest SAC. While we are not objecting to this application, we would like to have further discussions with the London Borough of Haringey with regards to developments of this size coming forward, and the potential for in-combination impacts on Epping Forest SAC, and possible mitigation options. We are aware that the Haringey Local Plan is currently being drafted, and we would be happy to have these discussions either from a planning policy or development control perspective. Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.	Comments have been taken into account.
Thames Water	Waste Comments 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. 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,	Comments have been taken into account. The recommended conditions and

	based on the information provided. Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses. The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. “No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.” Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.https://developers.thameswater.co.uk/Developing-a-large-site/Planning-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 There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We’ll need to check that your development doesn’t limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes.	informative will be secured.

	Water Comments Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed	

	development is located within 15m of Thames Waters underground assets, 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/Planningyour-development/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk	
Historic England (GLAAS)	Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. The site is outside an APA. It is crossed by the course of the Moselle and there may be benefits in re-instating the historic watercourse in a new scheme. The original Broadwater Farm stood further north, fronting Lordship Lane, and would not be harmed by this proposal. No further assessment or conditions are therefore necessary.	Comments have been taken into account.
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 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	Comments have been taken into account. The recommended conditions and informatives will be secured.

	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. ***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. ***Section 3 - Conclusion:***	

	We would ask that our department's interest in this planning application is noted and that we are advised of the final **Decision Notice**, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.	
Canal and River Trust	The Canal & River Trust is a statutory consultee under the Town and Country Planning (Development Management Procedure) (England) Order 2015. The current notified area applicable to consultations with us, in our capacity as a Statutory Consultee was issued to Local Planning Authorities in 2011 under the organisation's former name, British Waterways. The 2011 issue introduced a notified area for household and minor scale development and a notified area for EIA and major scale development. This application falls outside the notified area for its application scale. We are therefore returning this application to you as there is no requirement for you to consult us in our capacity as a Statutory Consultee. We are happy to comment on particular applications that fall outside the notified areas if you would like the Canal & River Trust's comments in specific cases, but this would be outside the statutory consultation regime and must be made clear to us in any notification letter you send.	Comments have been taken into account.
Thames 21	No comments to make.	Noted.

Appendix 4 – Consultation Response from Greater London Authority (Stage 1)

GREATER**LONDON**AUTHORITY

Planning report GLA/2022/0249/S1/01

30 May 2022

Broadwater Farm Estate, London

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2022/0823

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of the existing buildings and structures involving the loss of 242 dwellings, and erection of seven new mixed-use buildings ranging from 1-9 storeys to provide 294 new dwellings, over 1200sq.m of commercial and community floorspace including a wellbeing hub, and an energy centre; together with landscaped public realm and amenity spaces; car-parking; cycle parking; refuse and recycling facilities; and other associated works.

The applicant

The applicant is **London Borough of Haringey**, the architect is **Karakusevic Carson Architects**

Strategic issues summary

Land Use Principles: The redevelopment of part of the estate for residential, community and employment floor space along with public realm improvements is supported. Overall, and subject to Council securing floorspace and suitable rent levels, the estate renewal meets with the requirements of the London Plan and the GPGER.

Housing: The proposal will increase the quantum of housing all of which (100%) will be social rent affordable units which is strongly supported. The unit mix provides a good range of housing type and sizes, however the Council should confirm that it meets housing need.

Urban Design and Heritage: The scheme raises no strategic concerns with regards to layout, scale, appearance and accessibility and the new improved public realm with substantial playspace is welcome. The scheme will not harm any nearby heritage assets. The fire strategy must meet with the London Plan requirements and be secured.

Transport: The number of car parking spaces on site should be reduced. A station and line impact analysis on the Underground system is required. Discussions between the Council and TfL are required regarding a contribution towards the Healthy Streets proposals. Further details of long stay cycle parking, travel plan and details affecting the safeguarding of the W4 bus route are required. Management Plans, details of blue badge and EVCP provision should be secured.

Sustainability and Environment: The scheme will meet with urban greening and biodiversity requirements. Further information on energy, WLC and circular economy is required, and mitigation measures on flood risk and air quality should be secured by condition.

Recommendation

That Haringey Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 104. Possible remedies set out in this report could address these deficiencies.

Context

1. On 31 March 2022 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2. The application is referable under the following Category/categories of the Schedule to the Order 2008:

   - *Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats". Strategic planning issues and relevant policies and guidance*

   - *Category 3A: "Development which is likely to result in the loss of more than 200 houses, flats, or houses and flats" (irrespective of whether the development would entail also the provision of new houses or flats)*

3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; or, allow the Council to determine it itself. In this case, the Council need not refer the application back to the Mayor if it resolves to refuse permission.

4. The Mayor of London's statement on this case will be made available on the GLA's public register: https://planning.london.gov.uk/pr/s/

Site description

5. The site forms part of the 18.73 hectare Broadwater Farm Estate and the former Moselle School. The Estate is comprised of 12 different blocks containing a total of 1,078 properties owned by Haringey Council and managed by Homes for Haringey, the Council's Management Organisation.

6. The two residential buildings (Northolt and Tangmere) along with four ancillary buildings that form part of the estate renewal are located centrally within the estate. The former Moselle school is located to the northwest of the estate.

7. The site forms part of the Council's Site Allocation SA61 which consists of all the Broadwater Farm Estate.

8. The sites form part of the Broadwater Farm Estate located adjacent to Adams Road and Willan Road. The nearest part of the Transport for London Road Network (TLRN) is Bruce Grove located 700m to the east. Cycleway 1 (CS1) is located along Broadwater Road approximately 400m east of the site which connects the site to Dalston and Tottenham (northbound) and Finsbury (southbound). There is one bus service which operates in one direction on

Willan Road through the site which provide access to the W4 route. There are a number of bus stops located on Lordship Lane. Bruce Grove station is within 900m of the eastern of the site and provides access to London Overground services. The Public Transport Accessibility Level (PTAL) is rated 1-2 across the site on scale of 0-6b.

Details of this proposal

9. The proposal is the first two phases of the Broadwater Farm Estate renewal project. The scheme is residential led development consisting of the demolition of six estate buildings (Tangmere, Northolt, Energy Centre, Enterprise Centre, Medical Practice and Stapleford North wing) and also the adjacent former Moselle School and the phased construction of new buildings comprising of 294 affordable homes and 1,282sq.m of non-residential floorspace in buildings up to 9 storeys in height.

10. Specifically, the works will consist of the following:

    - Demolition of Moselle school and Tangmere.
    - Redevelopment of the Moselle School site and the former Tangmere site
    - Demolition of the health and enterprise building.
    - Construction of new well-being hub and energy centre
    - Demolition of the Northolt building
    - Construction of the new Northolt buildings.

11. Overall, the former Moselle School site will consist of 40 new homes, new retail, school parking and new public realm. The former Tangmere & health centre site which will consist of 154 new homes, a new well-being hub and new public realm and the former Northolt site will consist of 100 new homes, new public realm including community park and affordable work spaces.

Case history

12. On 28 January 2022, a GLA pre-application advice was issued for the proposed development. The note concluded that whilst the principle of the proposed estate regeneration is supported, further detail was required to confirm that the application would ensure the like-for like replacement of the existing social rented housing in terms of units, habitable rooms and floorspace. In addition, the note also advised that although no market housing is proposed, the overall net increase in affordable housing must be maximised and may need to be supported by a Financial Viability Assessment (FVA) to ensure that the most suitable tenure mix is provided. The applicant was encouraged to undertake further discussion on the FVA with regard to this matter. In terms of layout and design, the initial concepts were supported. The note also provided

commentary regarding transport, sustainable development and the environment that needed to be addressed within any future application.

Strategic planning issues and relevant policies and guidance

13. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the 2013 Haringey's Local Plan: Strategic Policies (with subsequent alterations adopted on 24 July 2017) Development Management Policies, Site Allocations and the London Plan 2021.

14. The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- The Affordable Housing and Viability SPG
- The Good Practice Guide to Estate Regeneration

15. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

- Estate regeneration – London Plan; Good Practice Guide to Estate Regeneration;
- Good Growth - London Plan;
- Opportunity Area - London Plan;
- Playing fields - London Plan;
- Housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Good Quality Homes for All Londoners draft LPG;
- Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;
- Reprovision of housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Affordable Housing and Viability SPG;
- Health facilities - London Plan; Social Infrastructure SPG; the Mayor's Health Inequalities Strategy;
- Education facilities - London Plan; Social Infrastructure SPG;

- Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Housing SPG; Play and Informal Recreation SPG; Good Quality Homes for All Londoners draft LPG;
- Heritage - London Plan; World Heritage Sites SPG;
- Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG
- Sustainable development - London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance draft LPG; Mayor's Environment Strategy;
- Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG;
- Transport and parking - London Plan; the Mayor's Transport Strategy;
- Equality - London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;
- On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found *here*. (Link to practice note)

Land use principles

Estate regeneration

16. In line with Policy H8C of the London Plan and the Mayor's Good Practice Guide to Estate Regeneration (GPGER), before considering the demolition and replacement of affordable homes as part of an estate regeneration scheme, boroughs should first consider alternative options which are more cost effective and have a lesser impact on residents and the environment. In this regard, the applicant has provided details demonstrating that they undertook an in-depth study into the reuse/refurbishment of the existing buildings. With regards to the buildings subject to this scheme, it was determined that they were no longer fit for purpose and it was necessary to replace them in order to facilitate a scheme that delivers new and improved housing and public realm. It is noted that other phases of the estate renewal include the refurbishment of existing homes, albeit, these future phases do not form part of this application. .

17. In addition, the applicant has advised that following engagement with residents there is overwhelming support for the regeneration proposals. A ballot of local residents was taken (February and March 2022) with 85% of participants voting in favour of the redevelopment. The early engagement of residents is strongly

supported by GLA officers. The applicant has demonstrated that the comprehensive regeneration at this site, in this instance is the most appropriate approach and adequately address the requirements of Policy H8C of the London Plan and the GPGER.

18. Where the demolition and redevelopment of an estate is supported such as this, Policy H8 of the London Plan also requires the like-for-like re-provision of affordable housing floorspace, at equivalent rent levels and at equivalent of better standard. Estate regeneration plans should also aim to increase the net provision of affordable housing, particularly homes at social rent levels. The GPGER also includes this requirement, along with a number of others, which are discussed below in the context of this scheme.

19. As a whole, the Broadwater Farm Estate includes 1078 homes, and the portion of the estate that forms part of this phased proposal consists of 242 homes. The proposal includes the construction of 294 new homes, all of which are expected to the social rent units. Further details of new homes are outlined within the housing section of this report. With regards, to Policy H8D of the London Plan, the proposal will increase the amount of affordable housing floorspace and all units will be social rent in tenure.

Demolition and like for like replacement

20. In line with the GPGER, the existing affordable floorspace must be replaced at an equivalent or better quality, at the same or similar rent levels. For the avoidance of doubt, the existing affordable housing floorspace includes both occupied and vacant floorspace, regardless of the current condition of the stock.

21. The proposed estate regeneration would result in the loss of the 242 homes consisting of 213 social rent and 29 leaseholder properties. The proposed development would deliver 294 new homes. As such the proposed development will replace all existing social rent accommodation and result in a net increase in such accommodation (with up to 81 additional social rent homes), in accordance with policy requirements.

22. Notwithstanding this, the proposal must demonstrate that the 242 existing social rented homes are fully re-provided in terms of tenure, floorspace and affordability. In this regard, the applicant has stated that following approval of the Broadwater Farm (BWF) Rehousing and Payments Policy in November 2018, the Council has successfully re-housed all secure tenants from Tangmere and Northolt buildings. All secure tenants that have moved off the estate have a guaranteed Right to Return under the BWF Rehousing and Payments Policy. It is understood that the rent strategy means that where residents are moved and their home demolished, they are able to return to the Estate on similar terms to their previous tenancy, with rents capped at no more than 10% above the average for similar existing properties on the Estate. Further, the new homes will be prioritised for Broadwater Farm residents particularly to former residents of Tangmere and Northolt residents. Available homes will then be offered to eligible Broadwater Farm Estate secure tenants through the Neighbourhood Moves Scheme based on housing need with

priority given to those on the estate who are currently either under-occupying their current home or living in over-crowded homes. The approach appears to meet with the GPGER requirements with regards to the above requirements, however the Council should appropriately secure the quantum of floorspace and rent levels.

Maximising additional genuinely affordable housing

23. As set out in the GPGER, in addition to ensuring no net loss of affordable homes, estate regeneration schemes must provide as much additional affordable housing as possible. To achieve this, and as set out in London Plan Policies H5 and H8E and the Mayor's Affordable Housing and Viability SPG, the planning application will be required to follow the Viability Tested Route.

24. A Financial Viability Assessment (FVA) was submitted as part of the submission documents. However, as the scheme increases the number of homes within the estate, all of which will be affordable (social rent) homes, it will be delivering the maximum additional affordable homes. Further, the applicant has also demonstrated that the unit mix and floorspace will match that of the existing housing stock. As such, GLA officers have formed the view that the housing proposed will meet with the requirements of both the GPGER and Policy H8E of the London Plan. Based on this, in this instance, a review of the FVA by the GLA's viability team is not considered necessary subject to the quantum and mix of housing being appropriately secured by the Council.

25. Notwithstanding Council's commitment to providing homes to residents of the estate (as outlined above), the Council should note that the Mayor is committed to the delivery of genuinely affordable housing and Policy H6 of the Mayor's London Plan, the Mayor's Affordable Housing and Viability SPG and the Mayor's Affordable Homes Programme 2016-21 Funding Guidance set out the Mayor's preferred affordable housing products. In particular, affordable rented homes should be provided at social rent or London Affordable Rent levels. Intermediate units should be available to households on a range of incomes below the maximum income threshold of £90,000. Household costs including rent and service charges must not exceed 40% of household income. Rent levels and eligible income thresholds must be confirmed and appropriately secured. A draft agreement should be provided to GLA officers to review prior to any Stage 2 referral to allow officers to check that these requirements are met.

Full right of return for social tenants/fair deal for leaseholders and freeholders

26. The GPGER seeks to ensure that social tenants who have to move have full right to a property on the regenerated estate of a suitable size, at the same of similar level of rent and with the same security of tenure. Furthermore, the GPGER requires that leaseholders and freeholders affected by estate regeneration are treated fairly and fully compensated if their homes are to be demolished.

27. In accordance with the Mayor's principles of "A fair deal for leaseholders', up to 16 of the new units could be taken up by returning leaseholders on a shared

ownership basis under their right to return. With respect to this, it is understood that 13 of these leaseholders have already acquired leasehold properties elsewhere in Haringey and have expressed no desire to return to the estate. It is also understood that the remaining leaseholders have indicated they wish to move off the estate. Based on this, there is an assumption that all 294 units will be social rented homes, nevertheless, there remains a mechanism for residents to return if required which accords with the Mayor's fair deal principles.

Full and transparent consultation

28. The GPGER sets out the Mayor's aspirations for full and transparent consultation and meaningful ongoing involvement with estate residents throughout the regeneration process, to ensure resident support.

29. The applicant confirmed that there has been significant engagement with the existing residents over the last two years. Details of the community consultation process and ballot have been provided that demonstrate this.

Housing supply and opportunity area context

30. Policy H1 of the London Plan seeks to optimise potential housing delivery across London, particularly through higher density residential development on brownfield sites with good existing or planned access to public transport and within walking distance of stations and town centres, including through the sensitive intensification of existing residential areas. The site has a site allocation for residential development in the Local Plan.

31. The proposed scheme would provide 52 net additional homes which would make a contribution towards achieving the 10-year housing targets in the London Plan and development benchmarks for the opportunity area. As such, the proposed comprehensive redevelopment and housing intensification of the site is supported.

Community facilities

32. The proposal would result in the loss of an existing medical centre, and enterprise centre. In line with London Plan Policy S1, the proposed development includes the re-provision of community facilities in the form of a new 635sq.m Small Business and Enterprise centre (SBEC) and a 266sq.m wellbeing Hub. The proposed units have been specifically designed to meet with the requirements of the estate community. The SBEC will provide opportunities for entrepreneurship and employment for the community with units be dispersed throughout the estate for specific purposes. The wellbeing hub will reprovide community services including the GP services. The proposed replacement community facilities make the best use of land, are expected to provide high quality, inclusive social infrastructure that addresses a local need and are located in locations accessible to all. Overall, the proposed co-location of the residential and community use within the estate meet with the objectives of Policy S1 of the London Plan and is supported.

33. It is noted the scheme also includes the former Moselle school site. Policy S3 of the London Plan states that there should be no net loss of education facilities unless it can be demonstrated that there is no ongoing or future need. The Moselle school was closed in 2011 with students relocated to the adjacent Broadwater Farm Inclusive Learning Campus. The school building has been demolished and the educational floorspace has been incorporated into the adjacent educational facility. As such, GLA officers have formed the view that the proposal will not result in a loss of educational facilities and accords with the requirements of Policy S3 of the London Plan.

Retail units

34. The proposal includes 381sq.m of retail floorspace. This will consist of four small units centrally located on Willan Road and will cater for local retail needs such as a fishmonger, café, specialist food store and hair/nail salon. The proposed retail floorspace is minimal and is expected to meet the needs of the estate community. Overall, the retail floorspace is considered appropriate for the site and does not conflict with the objectives of the London Plan town centre / employment policies.

Housing

35. The development proposes to increase the number of housing from 242 (852 habitable rooms) to 294 homes (1,242 habitable rooms). This is an increase in bedspace from 687 to 1,164. The proposed mix is outlined below in Table 1.

PLOT	1 BED	2 BED	3 BED	4+ BED	TOTAL
Tangmere	37	60	30	27	154
Northolt	34	33	19	14	100
Moselle	13	13	10	4	40
TOTAL	**84**	**106**	**59**	**45**	**294**
mix	29%	36%	20%	15%	100%

Table 1: Unit mix

36. With regards to tenure, London Plan Policy H6 sets out the Mayor's preferred tenure split of at least 30% low cost rent, at least 30% intermediate products and the remaining 40% to be determined by the Council. The proposal is that all units within the development will be social rent. Then mono-tenure in favour of low cost rent housing is strongly supported as it will provide the most needed housing within the borough and is supported by the Council.

37. As outlined above, the low cost rent units must be provided to facilitate a right to return for existing residents in accordance with Policy H8 of the London Plan. This should be appropriately secured by reference to Social Target Rent levels. London Affordable Rent (LAR) units should be secured by reference to the Mayor's LAR benchmark rent levels.

Housing choice

38. London Plan Policy H10 encourages a full range of housing choice. It states that boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs. The proposal includes a mix of units ranging from one bed to five bedroom family units with 104 family-sized units (35%) which is particularly welcome given all units are social rent. It is acknowledged that the mix differs slightly from the Haringey's Housing Strategy with more one bed units and slightly less family size units, however it is understood this mix responds to the housing needs within the estate and local area. The mix raises no strategic concerns, but to meet with the Policy H10 of the London Plan, the Council should confirm that they support the mix proposed.

Playspace

39. London Plan Policy S4 seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child that is not segregated by tenure.

40. The proposed unit mix is expected to yield 310 children. To address this, the proposal includes a play strategy that provides 5,070sq.m of play space within the estate which exceeds London Plan requirements. This includes doorstep play space for 0-4 year olds within the communal courtyards and play provision for 5 to 11 year olds within public realm. Play space for 12+ will be off site within the nearby Lordship Recreation Ground. In addition to these spaces, the applicant states that across the landscape and public realm, incidental social spaces and flexible furniture in the public realm has been provided that can double up as seating/stages and form part of a play infrastructure, defining a site wide cross generational play strategy.

41. The Council should by way of condition ensure that playspace is suitable for all age groups and accords with the requirements of Policy S4 of the London Plan and is retained on the site for the benefit of all residents. If this cannot be achieved then a financial contribution towards off-site provision should be secured by way of legal obligation.

Urban design

42. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture,

sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

Optimising development capacity and residential density

43. Policy D3 of the London Plan states that developments must make the best use of land by following a design-led approach that optimises the capacity of sites. Incremental densification should be actively encouraged to achieve a change in densities in the most appropriate way. Notwithstanding this, the policy states that schemes must also enhance the local context by delivering buildings and spaces that positively respond to the locality, facilitate active travel, distinguish between public and private environments and allow for efficient serving of all land uses on site. In this regard, the proposed scheme has been designed to increase the number of homes within the estate in a way that will also improve passive movements through the site, provide high quality new public realm that is surrounded by land uses that will activate the space. The proposal will increase density within the estate thereby optimising the development capacity of the site in accordance with Policy D3 of the London Plan.

Design scrutiny

44. London Plan Policy D4 requires that all proposals that meet the local definition of a tall building or exceed 350 units per hectare, and that are referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made or demonstrate that they have undergone a local borough process of design scrutiny.

45. The proposal has been presented to the Council's Quality Review Panel twice as confirmed in the case history. The feedback has generally been positive and the applicant has worked proactively to address comments made. Therefore, the proposals comply with Policy D4 of the London Plan.

Development layout and internal quality

46. The new built form is expected to greatly improve the layout of the estate that will result in an enhanced living environment for all residents. The perimeter block layout and the different typologies employed across the scheme are logical and efficient. Retail and community facilities help activate street frontage and will be located in convenient and accessible locations within the estate which is supported.

47. With regards to internal layout, almost all units are dual aspect and limited to five dwellings per core which is supported. Internal layout of buildings is efficient with all units and houses meeting minimum internal and external floor area standards. The flexibility of floorplates also allows for units to adapt to changing requirements within the estate and the inclusion of large family size townhouses around the perimeter adds to variety to the housing stock which is supported. The communal and external amenity spaces areas are well thought out and are expected to deliver improved amenity for future residents. The internal layout of buildings raise no strategic concern.

Scale and massing

48. Overall, the proposed massing strategy is consistent with the character of the area and raises no strategic issue as the scheme is expected to sit well within the estate and wider context.

49. The removal of the 19 storey Northolt building within the estate is expected to improve the appearance of the area as a whole and the massing and lower built form of the new buildings is expected to enhance the streetscape within the estate.

50. In terms of height, the highest building will be nine storeys and falls below the height that the Local Plan considers to be a tall building which is 10 storeys. As outlined above, the overall height of the estate is being reduced and GLA offices are of the view that overall, the building heights are considered appropriate and in line with the current townscape and raises no strategic concern.

Public realm and communal spaces

51. The Courtyard blocks wrapped around private courtyard/shared amenity space are expected to provide a safe and activated amenity spaces at ground floor for the residents. The triangular sized park facing the residential block has potential to form a popular area of amenity and communal activity which will help activate the estate and enhance community interaction. The focus on high quality, innovative landscaping in the area and across the masterplan is strongly supported. The location of retail and community uses adjacent to the new public realm helps to define and activate the new route through the estate. Overall, the new street network/public realm along with well-designed communal areas is expected to deliver safe and comfortable routes through the estate that will improve connectivity within the wider area. The Council should ensure that the building layout and separation do not have an adverse impact upon the quality of the new public realm, particularly with regards to micro-climate and being overbearing.

Architectural quality

52. The architectural approach is taking into consideration the distinctive character of the original estate with the addition of brick work with a colour pallet that reflects the materiality of the wider neighbourhood which is supported and raises no strategic concern.

Heritage

53. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' and in relation to conservation areas, special attention must be paid to 'the desirability of preserving or enhancing the

character or appearance of that area'. If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm in order to comply with the statutory duties.

54. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and, the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. London Plan Policy HC1 states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.

55. The site is not located within a Conservation Area and does not include any heritage assets. The nearby heritage asset is the Tower Gardens Conservation Area (TGCA) which is located approximately 200 metres to the north of the site. The Bruce Castle and All Hallows Conservation Area (BCAHCA) lies approximately 450 metres to the east of the site. The closest listed buildings are located within the Bruce Grove Conservation Area (BCCA) which lies approximately 500 metres to the east of the site.

56. In terms of impact, the applicant has provided details of the current estates impact/visibility from the nearest heritage assets. At present, only the 19 storey Northolt tower is visible from the TGCA and none of the existing buildings fall within the backdrop of other heritage assets. As the proposal includes the demolition of the Northolt tower and will only have a maximum height of nine storeys, GLA officers have formed the view that as the proposed buildings will not be visible within the backdrop of any heritage assets, the proposal development will not result in harm of any nearby heritage assets and as such, the proposal meets with the requirements of Policy HC1 of the London Plan and the NPPF.

Fire safety

57. Both an outline fire strategy report and Fire Statement were submitted as part of the submission. The fire documents were prepared by an independent assessor and assesses the proposal against the objectives of Policy D12 of the London Plan.

58. The statement confirms that the fire strategy is being prepared in accordance with fire safety design codes and practices. The statement outlines the approach (for all buildings) to building construction to ensure the maximum protection against fire, means of escape from units and communal areas, access and servicing for fire equipment, the siting of fire appliances and water supply. Further detail are expected to be included within the documents as the design progresses. Particular details are needed with regards to evacuation strategy including the need for evacuation lifts. The Council must ensure that all the proposed measures, as detailed in any final statement are secured through appropriate planning conditions.

Inclusive access

59. London Plan Policy D5 seeks to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). Policy D7 requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

60. The submitted Design and Access Statement states that in excess of 10% of the units (30) within the development will meet with the Building Regulation requirements M4(3) and the remaining units will meet Building Regulation requirements M4(2) being 'accessible and adaptable dwellings'. Further, the applicant states that the communal areas including lifts have been designed to be step-free and will meet with M4(3) requirements. The applicant must confirmed that at least one lift per core should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building as required by London Plan Policy D5.

61. The LPA should confirm that they are satisfied with the proposed unit split, layout and design of the units and secure M4(2) and M4(3) requirements by condition or planning obligation to ensure compliance with Policy D7 of the London Plan.

Transport

Trip generation and public transport impacts

62. It is estimated that there will be a net impact of an extra 79 two-way trips in the AM peak hour and 44 two-way trips in the PM peak hour of the residential element. This would equate to 10 two-way rail trips in the AM peak and 8 two-way rail trips in the PM peak hour.

63. As Bruce Grove Station and Turnpike Lane Station are relatively remote to the site, buses are likely to be used to access the stations, therefore it is requested that a first mode assessment is conducted by the applicant.

64. The applicant has assumed an even distribution of trips by local bus route regardless of distance from certain areas within the site. As route W4 extends through the site and connects to rail and undergrounds stations as well as major town centres, a greater proportion of trips should be allocated to that route. Depending on any outcome, a contribution to mitigate additional trips on this route maybe requested. Any temporary or permanent works to the existing bus stop should be secured through an appropriate planning mechanism.

65. The proposals have responded to pre application advice to safeguard two-way W4 bus operations which are welcomed, but as a carriageway width of only 5.8m is proposed. This should be reconsidered with swept path information, areas where on-street parking could be removed, and where an eastbound stop would be safeguarded. Further discussion about this matter with Transport for London is suggested. Any highway improvements within the site will need to be secured through a Section 278 agreement.

Healthy streets

66. The Transport Assessment (TA) includes an Active Travel Zone (ATZ) assessment which is welcomed although it has not identified some necessary interventions. The Council should secure 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). As noted above, the TA should have identified interventions including the Adams Road / Martlesham junction to improve the public realm where the walking/cycling path extends northwards to Lordship Lane. Griffin Road would also benefit from enabling two-way cycling, noting that some communal cycle stores within the Northolt block are close to the Griffin Road access. The Council are therefore urged to secure these improvements as works through the section 278 agreement.

Car parking

67. The development proposes 91 car parking spaces within the red line boundary and the use of 126 spaces in other parts of the estate. The applicant has proposed disabled bays for three per cent dwellings within the site boundary from the outset and has set out that a further seven per cent could be converted in the future. Electric vehicle charging points will be provided in line with London Plan standards.

68. The application includes evidence of parking beat surveys and resident engagement, and justification for car parking, including the existing oversupply of parking spaces, the lack of parking controls within the estate compared to surrounding areas. The applicant must clarify whether the beat survey was conducted over night, if this is not the case, this must be conducted and provided to TfL to justify the high numbers of parking proposed.

69. The number of proposed car parking and disabled persons spaces represents a ratio of 0.74 spaces per dwellings. As this site is in an Outer London

Opportunity Area (OALA), this is not compliant with the maximum requirements set out in London Plan Policy T6.1, as a OLOA requires a maximum of 0.5 spaces per dwelling.

70. At present, the parking proposed is not accepted due to non-compliance with London Plan standards. The applicant is requested to reduce the number of parking spaces proposed to be in line with London Plan Policy T6.1.

71. There is also concerned that the provision of parking would support a mode share for car driver and passenger of 28 per cent which is in excess of the MTS target for 88% of trips in Haringey to be made by public transport, walking or cycling.

72. For the quantum of parking that is ultimately agreed, the adoption of a Parking Design and Management Plan (PDMP) is welcomed in terms of ensuring that spaces are efficiently managed.

73. Future residents of the redevelopment of this site should be prevented to obtaining car parking permits, secured by an appropriate planning mechanism. It is also requested that the parking spaces is to be occupier lifetime only

Cycle parking

74. A total of 549 long stay residential cycle parking spaces and 11 short stay spaces are proposed, and for the non-residential elements 14 long stay and 24 short stay cycle parking spaces. These meet the minimum standards required by table 10.2 of London Plan Policy T5.

75. Long stay cycle parking will be spread across communal stores on ground floors and inside dwellings themselves. The proposal of providing cycle parking space inside dwellings is strongly supported. The long stay cycle parking for the non-residential element is shown in the public realm and should be provided in safe and secure bike shelters, to further promote and maintain cycling as a travel method for staff.

76. Short stay cycle parking will be located around the public realm. It is strongly recommended that the applicant provides several cargo bike parking spaces in the public realm, to support sustainable freight. Details of short stay provision should also be secured by condition

77. The proposed mix of long stay cycle parking is welcome as the development does not rely on two-tier racked parking, which are not accessible for all. The five per cent of the long stay cycle parking are accessible spaces which can accommodate larger cycles, including cargo cycles and adapted cycles for disabled people.

78. All details of long stay cycle spaces should be secured by condition to ensure that cycle parking complies with TfL's London Cycling Design Standards (LCDS) guidance and in accordance with London Plan Policy T5.B.

Travel planning

79. A framework Travel Plan (TP) has been submitted in support as part of the Healthy Streets TA. The TP should be secured, implemented and monitored as part of any Section 106 agreement.

80. Although it is welcomed that the applicant has targets within the TP to increase active travel over a five year period, the targets for cycling are considered unambitious. The applicant should implement comprehensive measures to promote and maintain cycling, especially due to the proximity of Cycleway 1.

81. Further comprehensive measures are expected in the full TP which strive to reduce car vehicle usage and encourages active and sustainable travel. It is also expected that the applicant provides a staff travel plan for the construction of the development.

Deliveries and servicing

82. An outline Construction Management Plan (CMP), a Framework Delivery and Servicing Plan (DSP) is included in the TA. A full Construction Logistics Plan and DSP should be secured by condition all produced in accordance with TfL best practice guidance.

Transport summary

83. In order to comply with the transport policies of the London Plan further work or obligations are required in relation to the following:

- A station and line impact analysis on the Underground system
- A contribution to the Healthy Streets proposals– to be discussed and agreed with Haringey Council
- Further details of long stay cycle parking
- Travel Plan
- Details affecting the safeguarding of the W4 bus route

84. Conditions should be secured for:

- Parking and Design Management Plan, blue badge and EVCP provision
- Delivery and Servicing Management Plan
- Details of long stay and short stay cycle parking and facilities
- Full Construction Logistics Plan and Construction Management Plan

Sustainable development

Energy strategy

85. Policy SI2 of the London Plan relates to minimising greenhouse gas emissions and sets out energy strategy requirements for major development proposals, Policy SI3 sets out requirements for energy infrastructure and Policy SI4 sets out requirements to manage heat risk.

86. Once all opportunities for securing further feasible on-site savings have been exhausted, a carbon offset contribution should be secured to mitigate any residual shortfall.

87. The energy strategy has been reviewed by GLA officers who consider it not to be compliant with London Plan energy policies. Subsequently, additional information or consideration regarding the following is required:

    - GLA carbon emission reporting spreadsheet must be completed
    - Confirmation of mitigation measures for overheating
    - Priority to connect to the future Upper Lea Valley Network and/or Edmonton Energy Waste scheme, evidence of correspondence with network operator.
    - Details of site-wide heat network connections and ability to connect to district heat networks.
    - Roof layout and details of PV to be provided
    - Be Seen monitoring commitment to be secured

88. The proposal seeks to achieve a 66% reduction in regulated carbon dioxide emission for domestic and a 44% reduction for non-domestic which exceeds the 35% reduction required by the London Plan. The remaining carbon emissions will be offset to achieve net zero carbon. The proposal would result in the requirement of a carbon offset payment calculated using the GLA's recommended carbon offset price of £95 per tonne. This should be secured within a s106 agreement.

Whole Life Carbon (WLC)

89. The WLC strategy has been reviewed by GLA officers who consider it not to be compliant with London Plan WLC policies. Subsequently, additional information or consideration regarding the following is required:

    - Permissions to submit assessments to Built Environment Carbon Database
    - Information regarding the retention and reuse of existing buildings
    - details of pre-construction demolition carbon related emissions

- details of use of existing elements
- clarification of values within template

90. Detailed comments regarding Energy and WLC have been forwarded under separate cover and these will outline specific measures which should ensure compliance.

Circular Economy

91. London Plan Good Growth objective GG5 states that those involved in planning and development should recognise and promote the benefits of transition to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 further states that the principles of the circular economy should be taken into account in the design of development proposals in line with the circular economy hierarchy. London Plan Policy SI7 requires major applications to develop Circular Economy Statements.

92. The Applicant has provided a Circular Economy Statement for review which included a Operational Waste Management Plan. GLA officers are of the view that the approach outlined within the statement is generally consistent with that required of the London Plan, however additional detail relating to the proposed measures, operational waste management and existing buildings should be included within the statement. Once updated, the council should ensure that initiatives outlined within any final version fully accords with the requirements of Policies D3 and SI 7 of the London Plan and that the strategy be secured as part of any consent issued. A copy of the GLA's Circular Economy comments will be forwarded to Council separately.

Environmental issues

Urban greening and biodiversity

93. London Plan Policy G1 encourages development proposals to incorporate elements of green infrastructure, which should be planned, designed, and managed in an integrated way to achieve multiple benefits. London Plan Policy G5 states that developments should include urban greening as a fundamental element of site and building design. Policy G5 also sets out a new Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. Policy G6 of the London Plan states that developments should manage impacts on biodiversity and aim to secure net biodiversity gain.

94. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.4, which meets the target set by Policy G5 of the London Plan. The proposed development is therefore compliant with Policy G5 of the London Plan.

95. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered

positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. The applicant has provided a Biodiversity Net Gains (BNG) Assessment, which concluded that there will be a 128.87% increase in BNG.

96. GLA officers are of the view that the applicant has made every attempt to maximise urban greening on the site to meet with UGF targets. The proposed urban greening and biodiversity improvement is considered appropriate when assessed against the requirements of Policies G1, G5 and G6 of the London Plan.

Sustainable drainage and flood risk

97. A flood risk and surface drainage assessment accompanied the submission. The site is located within Flood Zone 1. In accordance with Policy SI 12 of the London Plan, a Flood Risk Assessment (FRA) was provided and confirmed that the site is at low risk of flooding from all sources with the exception of surface water. With regards to this, some parts of the site are at high risk, however that this area is contained within the roads. The FRA concludes that the development is acceptable with regards to flood risk and is in line with London Plan policy.

98. With regards to sustainable drainage, the applicant has stated that surface runoff will be reduced through the use of permeable paving, below ground attenuation tanks and green roofs. GLA officers have reviewed the submitted SuDS approach and concluded that the proposed development does not currently meet all the requirements of Policy SI5 of the London Plan as no information is provided regarding the water consumption targets of the non-residential uses of the site. As such, the applicant should also consider water harvesting and reuse to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide a dual benefit. The LPA should secure these requirements of way of condition.

Air quality

99. Policy SI 1 (Improving Air Quality) of the London Plan states that any development proposal should not lead to further deterioration of existing poor air quality and not be located or operated in a manner that would subject vulnerable people to poor air quality.

100. The submitted air-quality assessment has been assessed against the requirements of the London Plan. The proposed development is not located within an Air Quality Focus Area and will not introduce any new sensitive receptors to unacceptable air quality conditions which meets with the requirements of London Plan policy SI 1 (B) (2d). The proposed development will provide 91 car parking spaces for 294 dwellings (0.31 per dwelling), which is below the London Plan maximum level for Outer London (0.5 spaces per dwelling) which meets with the requirements of London Plan Policy T6/T6.1. Notwithstanding this, further justification is required to support the conclusion that construction traffic will not result in significant air quality impacts at existing

sensitive receptors. Further information on the impacts of emissions from any backup generators should also be provided. In conclusion, the LPA should agree additional mitigation or offsetting in response to the exceedance of the Transport Emission Benchmarks.

Local planning authority's position

101. Haringey Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

102. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

103. There are no financial considerations at this stage.

Conclusion

104. London Plan policies on housing, affordable housing, urban design, heritage, inclusive design, sustainable development, green infrastructure, and transport are relevant to this application. Whilst the proposal is supported in principle, the application does not currently fully comply with some of these policies, as summarised below:

- **Land Use Principles**: The redevelopment of part of the estate for residential, community and employment floor space along with public realm improvements is supported. Overall, and subject to Council securing floorspace and suitable rent levels, the estate renewal meets with the requirements of the London Plan and the GPGER.

- **Housing:** The proposal will increase the quantum of housing within the estate, all of which (100%) will be social rent affordable units which is

strongly supported. The unit mix provides a good range of housing type and sizes, however the Council should confirm that it meets housing need.

- **Urban Design and Heritage**: The scheme raises no strategic concerns with regards to layout, scale, appearance and accessibility and the new improved public realm with substantial playspace is welcome. The scheme will not harm any nearby heritage assets. The fire strategy must meet with the London Plan requirements and be secured.

- **Transport**: The number of car parking spaces on site should be reduced. A station and line impact analysis on the Underground system is required. Discussions between the Council and TfL are required regarding a contribution towards the Healthy Streets proposals. Further details of long stay cycle parking, travel plan and details affecting the safeguarding of the W4 bus route are required. Management Plans, details of blue badge and EVCP provision should be secured.

- **Sustainability and Environment**: The scheme will meet with urban greening and biodiversity requirements. Further information on energy, WLC and circular economy is required, and mitigation measures on flood risk and air quality should be secured by condition.

For further information, contact GLA Planning Unit (Development Management Team):
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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

Appendix 5 – Summary of Representations from Residents

	Summary of objection	Response
LOCAL REPRESENTATIONS: ***4 INDIVIDUAL RESPONSES*** ***1 IN OBJECTION*** ***1 IN COMMENT*** ***2 IN SUPPORT***	**Material planning considerations** • Development is not financially viable • Loss of health centre	• The development replaces all affordable housing (in terms of both units and floor area) that is to be demolished and maximises the affordable housing provision on site as part a development for 100% council rented housing that has been optimised through a rigorous design-led approach. As such, the GLA has confirmed that a financial viability review is not required for this proposal and no viability assessment has been made as part of the planning application assessment. • The utilisation of the existing medical centre is sub-optimal. The proposed Wellbeing Hub would re-provide existing GP facilities as part of a broader range of services within an improved environment. The Hub would reflect new forms of healthcare provision by enabling health staff and services to be co-located with other related services within local communities, which facilitates greater and more efficient service integration and improves health outcomes though increased early intervention. The new Hub

		would not result in a reduction in GP services. The Council's Heath in All Policies Officer is in support of this application.
	• Insufficient family-sized housing	• There would be a 62.5% increase in the number of family-sized homes on site (from 64 to 104) plus a significant increase in the number of larger family (4 bed) homes, from three to 44. 35% of all new homes would have three or more bedrooms which is a substantial proportion of the new homes proposed.
	• Excessive loss of day/sunlight	• Detailed analysis of the development's impact on day/sunlight conditions to existing homes on the estate is set out in the main body of the report. 92% of windows tested would retain acceptable levels of sunlight. 7% of windows tested would experience a significant noticeable change in daylight conditions, and these windows either already experience poor levels of daylight or would still have good levels of daylight for an urban area.
	• Inadequate parking provision	• 91 parking spaces would be available on site and any additional parking demand would be accommodated on other streets within the estate, where there is ample space capacity. Residents would be guided towards sustainable modes of transport

	• Inappropriate internal kitchen layouts	through measures including high-quality cycle infrastructure and travel plans. • A mix of open plan and separated kitchen/living spaces would be provided to ensure residents have a choice and are easily able to adapt their homes to their preference. In larger homes all kitchens and living spaces will be provided separately.
	Non-planning considerations • Individual request for a home in the new development	• This is not a matter for the Local Planning Authority to consider. All requests for new homes should directed to the Council's Housing section.